Exhibit A

This page intentionally left blank.

EXHIBIT A
DISCUSSION

Background and Site Conditions

The Project site and adjoining properties were undeveloped land from at least 1919 through 1949. In 1949, the County of Monterey Planning Commission approved a Use Permit (Resolution No. 631) to allow the Jergins Oil Company to explore, drill and remove oil and gas on various tracts of land near San Ardo (approximately 22,000 acres). By the 1950s, the site area was gradually developed into what is now known as the San Ardo Oil Fields. During the 1950s into the early 2010s, the site, and immediate vicinity contained approximately 60 oil-gas wells, pits/sumps, pipelines, access roads, and related infrastructure. The configuration of the oil gas facilities continuously changed during this timeframe. By at least 1973, a cogenerating station was operating to the immediate northeast of the site, and parts of this facility appeared to extend onto the northeast portion of the site from 1981 through 2012. This included three bulk storage tanks present from 1994 through 2009.

In 2013, oil-gas facilities (and the portion of the generating station within the footprint of the site) were removed and closure of the Ferrini Flats area was completed by Aera Energy's remedial contractor to the standards of the regulatory agency at the time, State of California Division of Oil, Gas and Geothermal Resources. The closure included bulk removal of oil-impacted soils and re-grading of the Project site. Within the Project site's subsurface conditions remain the 7- to 8-inch-diameter steel well bores from the 2013 remediation. Over 100 well bores and 20 idle wells occur within the subject, APN: 423-081-019-000. During the abandonment process in 2013, these well bores were cut at least 5 feet below grade (no more than 10 feet) per California Department of Conservation, Geologic Energy Management Division (CalGEM) requirements. In addition, the wells were filled with concrete to the top of the cut well, capped, and backfilled with remediated soil. CalGEM monitored these well abandonments and signed off on the proper permits. Since 2013 the Project site has been used by Aera Energy for storage and other minor activities.

General Development Plan

A Draft General Development Plan (GDP) has been prepared for the Proposed Project in compliance with Title 21 section 21.28.030. The four major components to the GDP include: Project Details (Solar Arrays and Inverter Blocks, Construction, Applicant Proposed Environmental Measures and Design Features, Operation and Maintenance, and Decommissioning.

The purpose of the Proposed Project is to support renewable energy initiatives established by the State of California; specifically, to reduce the need for imported power. The 23,348 solar PV panels would convert solar energy into direct current electricity. The generated power would be routed from the proposed PV facility to an existing point of interconnection (power line) using an underground medium voltage collection system. The point of interconnection would consist of a series of poles with pole-mounted metering and safety devices before connecting to the existing Aera Energy overhead power line, located just east of the Project site. The existing Aera Energy power line connects to the existing Aera Energy-owned and operated substation. Further, the energy generated from the Project's solar panels would be routed to three central inverters to

be converted from DC to AC power. Three medium voltage transformers would increase the AC voltage from 600 volts to 12.47 kilovolts. The generated solar power would be used solely at the Aera Energy oil field, and would fully offset Aera Energy's energy demand, which is currently supplied by the Pacific Gas and Electric Company (PG&E). All energy generated from the project would be consumed on-site.

1. Construction

   Project construction would consist of two major stages. The first stage would include site preparation, grading, and preparing staging areas and on-site access routes. The second stage would involve assembling the racking system and constructing electrical interconnection facilities. Grubbing and grading would occur on the site to achieve the required surface conditions. Grading would consist of localized smoothing. Cuts and fills within 15-ft of abandoned oil well locations would be limited to a maximum depth of 3 feet to provide a safe buffer above the abandoned depth of the well heads (8-10 feet below the surface). Typical equipment during construction would include a pile foundation driver, skid steers, forklifts, bulldozers, backhoes, tractors, excavators, graders, front-end loaders, and semi-trucks. Construction would be completed in approximately 5 months and start in the first quarter of 2025.

   Hazardous wastes are not anticipated to be on-site. If hazardous wastes do occur on-site, they would be removed and disposed of in accordance with local, state, and federal laws. At the footing of the power conversion system pads, the existing soil would be scarified and recompacted as recommended by the geotechnical engineer. Racking for the PV arrays would be supported by a combination of ballast foundations (concrete foundations set on grade), and driven piles. At locations where there is an abandoned oil well, only ballasted foundations would be installed, and no driven piles would be installed within a 15 foot radius of the oil well. This design approach would ensure no driven piles come in contact with an abandoned oil well (see below *Hazards and Hazardous Materials* discussion).

   Hours

   Construction would occur primarily during daylight hours, Monday through Friday between 7:00 a.m. to 7:00 p.m., and, if necessary, between 8:00 a.m. to 8:00 p.m. on Saturdays and Sundays, in compliance with the County of Monterey General Plan Safety Element and Monterey County Code. If the schedule has been delayed due to weather or other event, construction may require some nighttime activity for material and equipment delivery. Nighttime activities would be performed with temporary lighting, which would be directed downward to minimize impacts to neighboring properties and wildlife in the project vicinity.

   Workforce and Construction Traffic

   Approximately 20 construction workers would be present on site daily, with an expected peak of approximately 80 workers during the first month of construction. Approximately 4 daily truck trips and 60 maximum daily worker vehicle trips (assuming 33% of trips are carpooled) are anticipated during the peak of construction. Carpooling would be encouraged. Portable toilet facilities would be installed for use by construction workers.

Temporary Construction Staging Areas

Temporary construction staging areas within the project site would be graded with a gravel surface and temporarily fenced to provide space for trailers and storage for supplies, vehicles, and equipment during construction.

Stormwater and Dust Control

The project would not substantially modify the natural drainage pattern of the project site and no on-site stormwater detention facilities would be constructed. County of Monterey conditions of approval require the applicant/owner to submit a Stormwater Pollution Prevention Plan (SWPPP) prior to issuance of any construction permits. All site preparation and construction activities would be performed in accordance with the SWPPP, which may include use of water trucks to manage dust; silt fencing, straw bales and temporary catch basins, and inlet filters to control stormwater; and truck tire muck shakers, or similar devices, to prevent mud and debris from being carried onto roadways. During construction, approximately 150,000 to 250,000 gallons of non-potable water (approximately 0.8 acre-feet) is anticipated to be required for dust suppression and other purposes. Water would be pumped from an existing well, located approximately 0.2-mile northeast of the project site.

Water and Wastewater

As discussed above, approximately 0.8 acre-feet of water is anticipated for dust suppression and other purposes. This water would be pumped from two existing on-site non-potable wells. The project does not include, or require the need for, potable water.

Portable restroom facilities would be provided for workers during construction; no permanent sanitary facilities would be installed for project operation. Water use during operation would be less than 1.0 acre-foot per year for panel washing and general maintenance. The need for panel washing would be infrequent (e.g., months to years between washings) and determined based on the actual condition of the solar panels and any expected benefit from cleaning.

Solid Waste

Most waste generated during construction would be non-hazardous and consist primarily of cardboard, wood pallets, copper wire, scrap metal, common trash, and wood wire spools. Construction waste materials, such as metal and wood, would be handled in accordance with the California Green Building Standards Code, separated from the waste stream, and recycled whenever feasible. Non-recyclable construction waste would be placed into commercial trash dumpsters located on site. Dumpsters would be collected as needed by Waste Management and delivered to the San Ardo #2 Transfer Station. Construction would generate approximately 100 cubic yards of solid waste over the entire construction period, with approximately five cubic yards of solid waste generated per week.

2. Applicant Proposed Environmental Measures and Design Features

Biological Resources:

- Work Timing. All work activities shall be completed during daylight hours (between sunrise and sunset) and outside of rain events, to the greatest extent feasible. Although not anticipated, should construction activities occur during the night, the project site shall have adequate lighting and the project biological shall be on-site to determine the presence of sensitive species.
- Work Limits. The Project impact area shall be clearly marked or delineated with stakes, flagging, tape, or signage prior to work. Areas outside of work limits shall be considered environmentally sensitive and shall not be disturbed.
- Environmental Awareness Training. A qualified biologist shall provide a Biological Awareness Training to Project personnel, detailing potentially occurring special status wildlife species and impact avoidance measures.
- Vehicles and Equipment. All equipment and vehicles shall be checked and maintained daily to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established for vehicle/equipment parking and storage of fuel, lubricants, and solvents. All fueling and maintenance activities shall take place in the staging area.
- Pre-activity Biological Surveys. A qualified biologist shall conduct biological surveys of the disturbance area no more than seven days prior to ground disturbing activities. Surveys shall include, installation of motion activated cameras at all burrows with potential to support American badger and/or San Joaquin kit fox. Cameras will be in place for a minimum of three consecutive nights to determine occupancy. Appropriate buffers around active burrows will be established in consultation with the Project biologist and relevant resource agencies.
- Biological Monitoring. Biological monitoring shall be completed by a qualified biologist for all initial ground disturbance (e.g., grading/excavation activities). For this task, the biologist shall survey/clear undisturbed work areas prior to start of work and then monitor the area while initial grading activities are completed. Any wildlife observed during monitoring shall be allowed to move out of work limits of their own volition or shall be captured and relocated to nearby suitable habitat by the biologist, as necessary and in compliance with state and federal Endangered Species Act regulations.
- Nesting Bird Surveys. If vegetation removal (i.e., tree trimming/removal activities) is scheduled between February 1 and August 31 (general nesting bird season), nesting bird surveys shall be completed by a qualified biologist within 48 hours prior to start of work. If any active nests are discovered within or adjacent to work limits, an appropriate buffer (i.e., 500 feet for raptors and 250 feet for other birds, or at the discretion of a qualified biologist based on biological or ecological reasons) shall be established to protect the nest until a qualified biologist has determined that the nest is no longer active and/or the young have fledged.
- Wildlife Friendly Fencing. Security fence design and materials shall be incorporated to increase the fence's visibility to wildlife and reduce the chance of entanglement. Project fencing shall also include gaps to enable non-flying wildlife to pass through.

- Erosion Control. A Storm Water Pollution Prevention Plan (SWPPP) for all activities conducted within the Project limits shall be implemented and maintained during construction. Where needed, erosion and sediment controls (e.g., silt fences, straw wattles) shall be installed properly to increase effectiveness and shall be maintained regularly. Other Best Management Practices (BMPs) shall also be implemented as necessary and/or as required by Project permits, such as avoid washing, refueling, and maintenance of equipment within 50 feet (unless otherwise noted in Project-specific permits) from stream channels, regardless if water is present or absent in the channel.

Air Quality:

- Construction Emissions: All diesel-powered construction equipment used during Project construction shall use a minimum of Tier 3 construction equipment; Tier 4 Final construction equipment will be used when reasonably and locally available.
- Water shall be applied to disturbed soils after demolition is completed or at the end of each day of cleanup.
- All trucks hauling dirt, sand, soil, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of 12 inches.

Valley Fever:

- A site-specific Valley Fever Management Plan (VFMP) will be developed for review and approval by the County of Monterey Health Department prior to soil-disrupting activities. The VFMP will include procedures for worker hazard awareness training, dust management, and safety measures to minimize worker and public exposure to dust that may contain the Coccidioides fungus spore known to cause Valley Fever. Documentation of Valley Fever training for workers on the site will be provided to County of Monterey HCD – Planning Department and the County of Monterey Health Department. Implementation of and adherence to the plan will be monitored by project team safety managers in alignment with the County of Monterey Health Department.

The above Applicant proposed environmental measures and design features are incorporated into the draft Conditions of Approval and Mitigation Measures, which are addressed in the Environmental Impact discussion below.

3. Operation and Maintenance

Once constructed, the project would operate 7 days per week, 365 days per year. The facility would be operated by Aera Energy, Solar Star Light Park LLC, or an affiliated company. Only minimal, infrequent on-site maintenance activities would be required for panel washing (up to twice per year), equipment repair, replacement, and vegetation control. The expected maintenance would generate minimal traffic during operations. Heavy equipment would not be utilized during normal operation. Large or heavy equipment may be brought to the facility infrequently for equipment repair or replacement or vegetation control. The operation would not require any additional workers beyond those already employed by Aera Energy or Solar Star Light Park LLC.

4. Decommissioning

At the end of the project's useful life (anticipated to be 20 to 35 years), the project would be decommissioned and restored. The proposed solar array is expected to be operational in 2025 and to remain in operation through 2045-2060.

Pre-dismantling activities include de-energizing and isolating the project from external electrical lines and delineated staging areas. As reclamation and equipment removal can take a year or more, access roads, fencing, sanitary facilities, and electrical power may temporarily remain in place for use by reclamation and restoration workers until no longer needed. Environmental protection measures installed during construction activities would be implemented during project reclamation and restoration. Consistent with current standard decommissioning practices, the PV solar modules and rack supports would be removed in their entirety from the site using cranes, dump trucks, and flat-bed and rear-loader garbage trucks. Some or all of the components (i.e., aluminum and steel components) would be salvaged and/or recycled, as feasible. Components that cannot be salvaged would be removed and disposed of in accordance with applicable laws and regulations. The PV modules are not considered hazardous waste and would be disposed of in an approved landfill near the project site or recycled by an approved module recycler. Electrical equipment including inverters, transformers, cables, overhead lines, and substation infrastructure would be reclaimed in accordance with local, state, and federal laws. Hazardous wastes are not anticipated to be on-site. If hazardous wastes do occur on-site, they would be removed and disposed of in accordance with local, state, and federal laws. Roads that will not be reused for future uses would be restored to preconstruction conditions.

Restoration

Once the Proposed Project is decommissioned, the site would be restored to current conditions. This would include removal of roads, parking areas, and the substation, de-compaction of soils using disking, and reseeding of disturbed areas. Reseeding would be accomplished with manually operated cyclone-type bucket spreaders, mechanical seed spreaders, blowers, hydroseeders, rubber-tired all-terrain vehicles equipped with mechanical spreaders, or other similar or more effective measures. If site restoration through reseeding is not feasible due to lack of water or other environmental factors, the Applicant/Owner would work with County of Monterey to identify and implement an alternate solution.