

# Exhibit B

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## DISCUSSION

### PROPERTY BACKGROUND:

The Moss Landing Power Plant (MLPP) was constructed in 1949 and began generating electricity in 1950. At complete buildout, the MLPP consisted of electric generating power Units 1 through 7 with the supporting infrastructures and 19 fuel oil storage tanks, which produced a net capacity of 2,060 megawatts (see **Figure 1**). Since 1950, there has been multiple significant upgrades and improvements. In 2002, MLPP developed a “Modernization Plan” that included replacement of Units 1 through 5 and upgrading Units 6 and 7. During this time the original Units 1 and 5 were not being utilized. In 2002, new electric generating Units 1 and 2 were constructed. In 2005, the original Units 1 through 5 consisting of the eight 225 foot smokestacks, including the original Units 1 and 2 that were operating since 1950, were demolished and removed along with the 19 fuel oil storage tanks. The footprint of where original Units 1 through 5 existed were replaced with asphalt by 2005 (see **Figure 2**).

Since the construction of MLPP in 1949, the subject property has not only changed in its physical use, but intensity of use as well. To date, MLPP does not operate at the prior capacity of 2,060 megawatts as mentioned above. Since the completion of the Modernization plan, the number of permanent employees and temporary/construction contractors have varied based upon the need of the MLPP, whether it was an installation period or general maintenance. During the Modernization Plan, construction and maintenance workers reached levels of 700 employees per day, 7 days a week, for a period of two months. In 2016, there were up to 420 employees were needed for on-site maintenance.

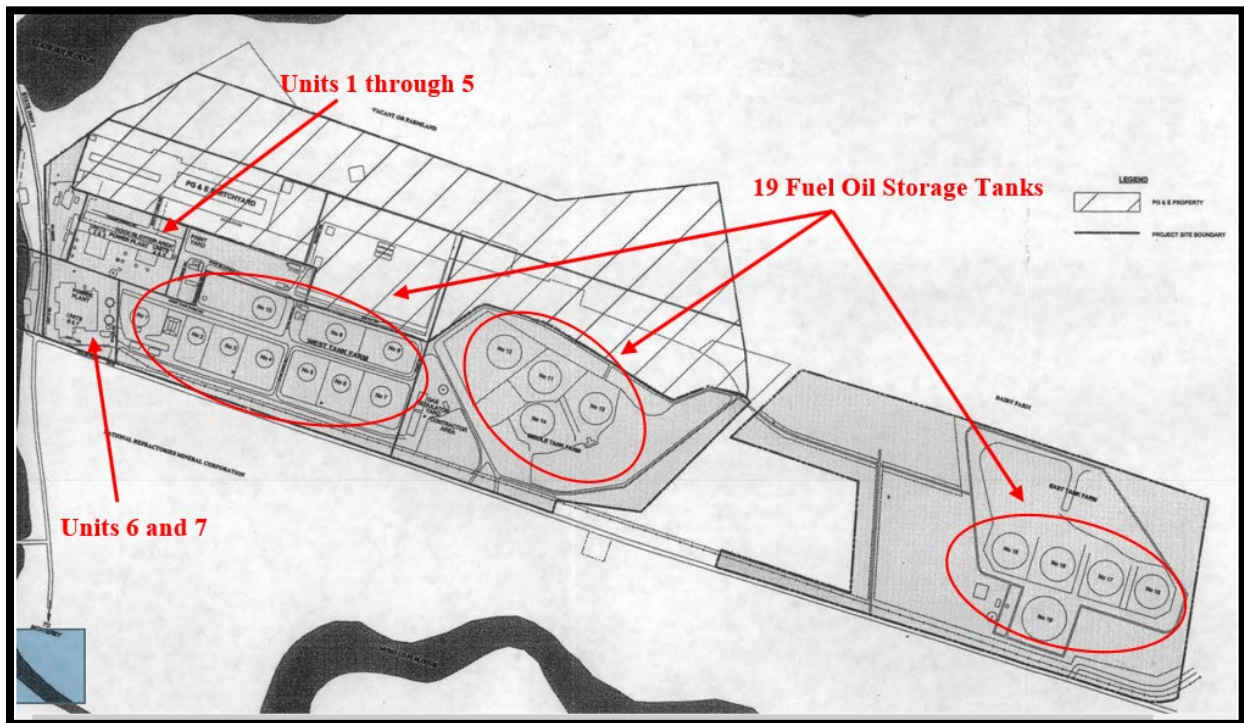
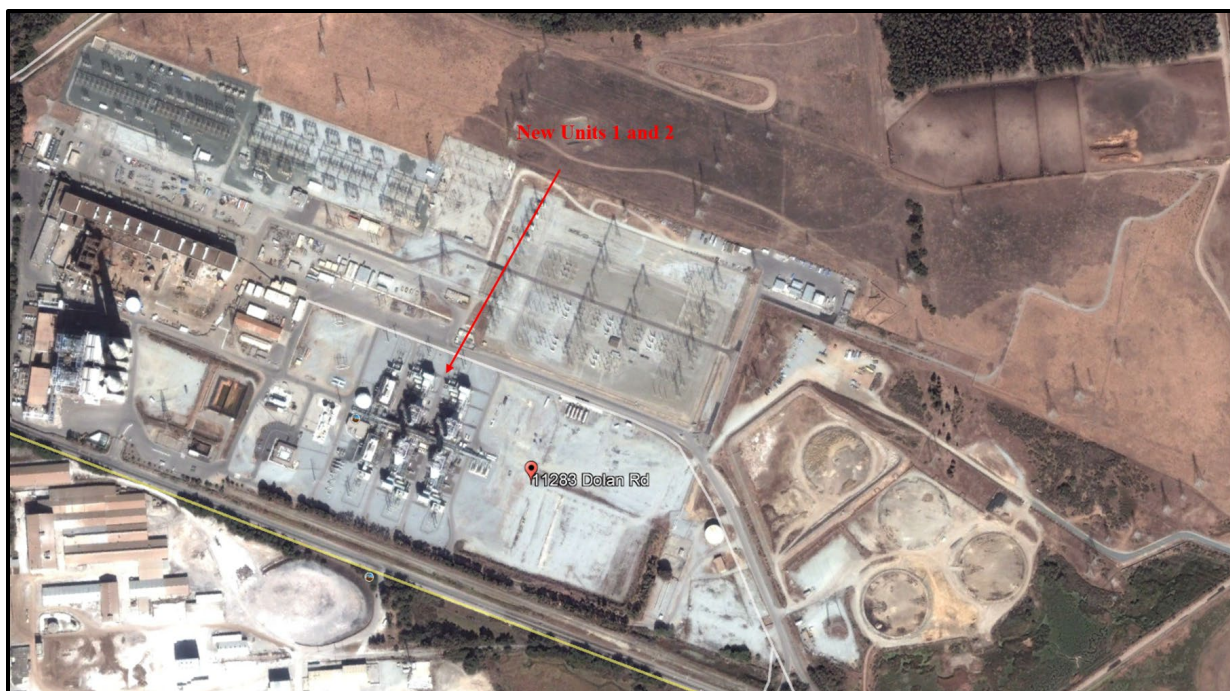


Figure 1. Project History 1949-2002



**Figure 2. Project Site Circa 2005**

#### EXISTING SITE CONDITIONS:

Since the Modernization Plan, three warehouse storage buildings and a 742 square foot non-occupied modular equipment enclosure that supports various frequency drive controls for new Units 1 and 2 have been constructed. Information from the applicant indicates that through construction of various infrastructure at the site, excavation to a depth of approximately 20 feet occurred. These facilities and the supporting electric power infrastructures are on a 90 acre portion of the 137.5 acre parcel (see **Table 1** below). The remaining 47.5 acres, east of the active portions, is the former fuel oil tank farm site. The demolition/cleanup of the fuel tanks and associated equipment has been completed under a previous planning approval (PLN990233<sup>1</sup>) and the area is now unpaved and vacant. Reuse of this area is not proposed with this application.

Facility	Existing Function	Facility
Power (turbine) building for former Units 1-5	Approved BESS facility	Power (turbine) building for former Units 1-5
Administration	Still in use	Administration
Warehouse	Still in use	Warehouse
Maintenance buildings	Still in use	Maintenance buildings
Two cooling water intake structures	One intake in service	Two cooling water intake structures

<sup>1</sup> Combined Development Permit consisting of a Coastal Development Permit for demolition of 19 above ground oil tanks and 150,000 cubic yards of grading and an Amendment to the Moss Landing Power Plant Master Plan to allow the proposed demolition and grading.

Two 500-foot chimneys for retired Units 6 and 7	Units not in use Distilled water tank in base still in use	Two 500-foot chimneys for retired Units 6 and 7
Four 145-foot chimneys for operating new Units 1 and 2	Tank in use	Four 145-foot chimneys for operating new Units 1 and 2
Oil/Water separator system located west of Unit 1 and north of the Energy Management Center	Still in use	Oil/Water separator system located west of Unit 1 and north of the Energy Management Center
Boiler make-up system (evaporator and demineralizers)	Still in use	Boiler make-up system (evaporator and demineralizers)
Energy Management Center building	Still in use	Energy Management Center building
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	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
Battery Energy Storage System Project in existing building	In construction (pending)	Battery Energy Storage System Project in existing building

**Table 1. Existing Electric Power Facilities**

### **Previous BESS Project**

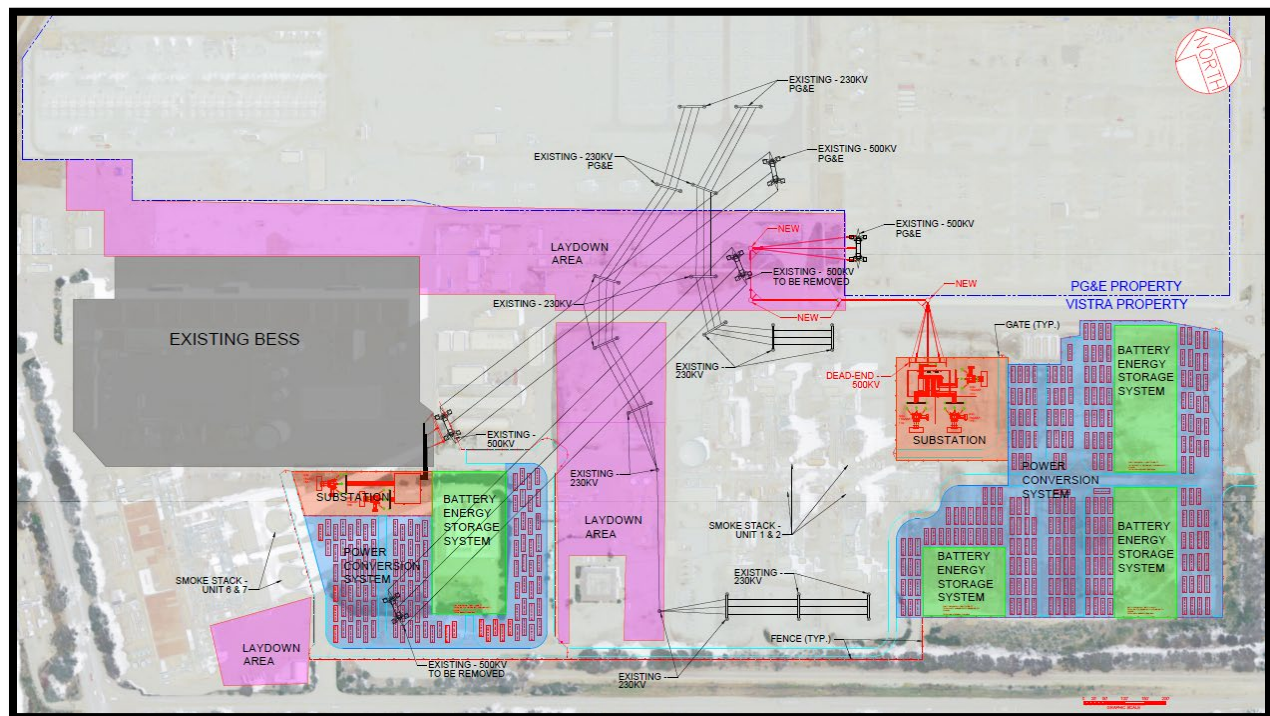
In 2019, Monterey County prepared an Initial Study-Mitigated Negative Declaration (IS-MND) for the Duke Energy Moss Landing LLC (Vistra Energy) project (Monterey County Planning File No. PLN180394). The project included the following components, all at the existing MLPP: approximately 200,000 battery 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



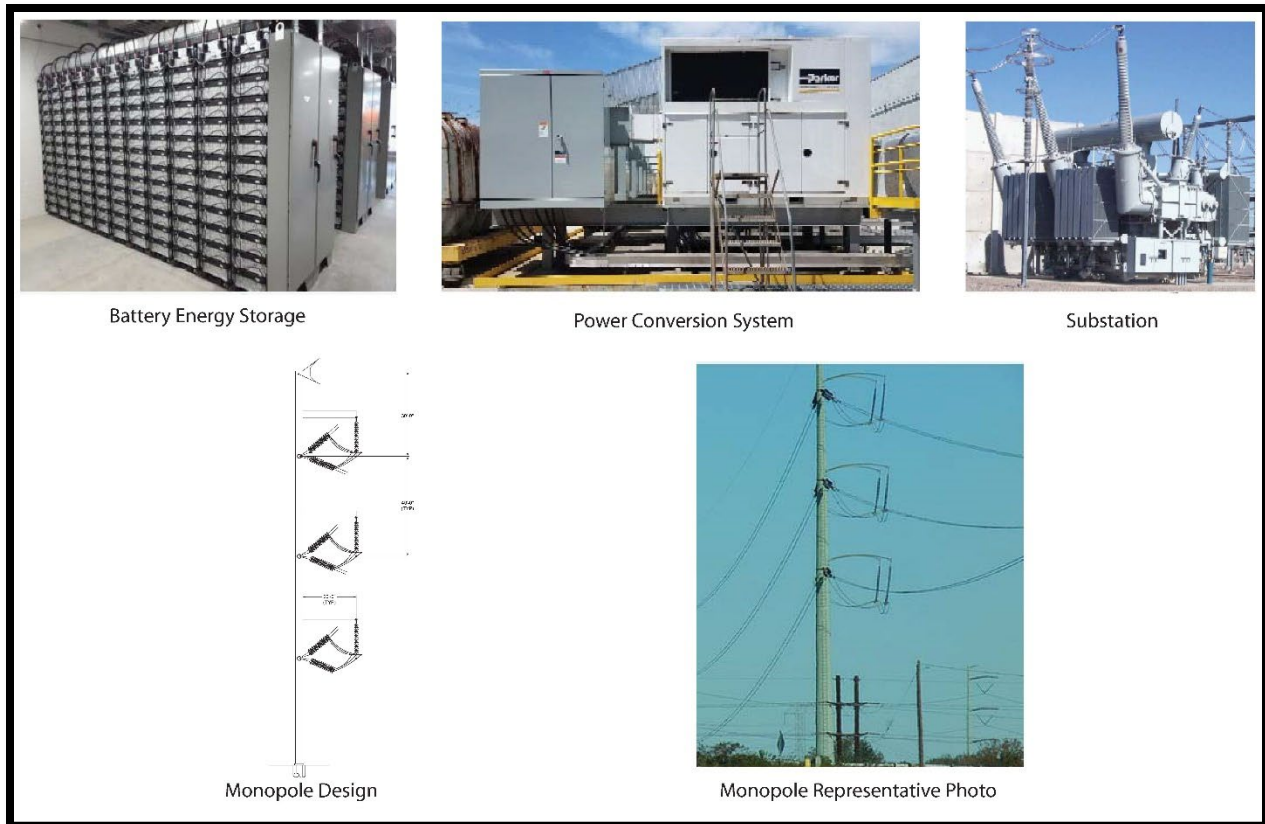
recirculated IS-MND was approved in May 2019. Construction began in October 2019 and is scheduled to be completed by the end of 2020.

#### PROJECT DESCRIPTION:

The proposed project consists of four 300 megawatt (MW) transmission-connected, standalone lithium ion Battery Energy Storage System (BESS) with four hours of storage and a 20-year life span, on the southwest portion of a 137.5 acre parcel (see **Figure 3**). The BESS contains three components: a battery energy storage; a power conversion system; and a substation (**Figure 4**). Further, transmission improvements that the substation would connect include the remove of two existing 500 kilovolts (kV) transmission towers as illustrated on **Figure 3**. The project includes the construction of up four (4) 150-foot monopoles. The substation receives energy from the electrical grid, the energy current is converted through the power conversion system and the energy is stored within the battery energy storage until utilized. When needed, storage energy gets routed out from the batteries through the power conversion system and substation, and into the electrical transmission grid.



**Figure 3. Site Plan**



**Figure 4. Project Components**

### **Battery Energy Storage**

The project proposes to install up to 500,000 total battery modules, up to approximately 125,000 battery modules in each (Building 1 – 106,500 sf, Building 2 – 94,500, Building 3 – 66,000 sf, Building 4 – 124,200 sf). The battery modules will be stored in approximately 9 to 24 feet tall racks that house 17-24 battery modules. Each building will be at height of 30 feet. The building floor plan will be reconfigured to store the batteries in separate rooms with independent access throughout the third and possibly first floor. Cables from each battery rack would be routed through the building, exiting to connect to the inverters and transformers within the power conversion system outside of the building.

### **Power Conversion System**

PG&E's electrical transmission grid operates in alternating current (AC) but the battery energy is stored utilizing direct current (DC); therefore, the power conversion system would receive the energy from the transmission grid in AC and convert it to DC to enable battery storage.

Conversely, energy is converted from DC to AC prior to dispersing it from the batteries back to the grid. The power conversion system would contain up 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. These components would be installed on top of the existing asphalt and would be connected to the batteries and substation by cables.

## **Substation**

PG&E transmission lines carry electricity throughout the State of California as part of the electrical transmission grid at high voltages. The transmission line located on the subject property runs at 500 kilovolts (kV). In order for the power to be converted from AC to DC at the power conversion system discussed above, voltage would need to be reduced to 34.5 kV at the substation. 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. Grading soils would either be retained onsite for reuse, hauled offsite for reuse, or hauled offsite for disposal.

## **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. 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. Up to four (4) 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. The proposed monopoles would be a height of 150 feet above ground and 50 feet in depth below ground. Appendages to the monopole 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.

## **Construction and Maintenance**

A preliminary Construction Management Plan (CMP) was provided by the applicant outlining the logistical planning of the proposed site improvements. 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 BESS, 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. These impacts have been determined to be a less than significant level or less than significant level with mitigation measures as described below.



### ENVIRONMENTAL REVIEW:

An Initial Study/Mitigated Negative Declaration or “IS/MND” (SCH No. 2020050309) for the project was prepared and circulated from May 15, 2020 through June 15, 2020. Comments from California Department of Transportation (Caltrans) and Molly Erickson with Stamp Erickson were received during the public review comment period (**Exhibit H**).

During environmental review of the project, potential impacts to cultural resources, energy, geology/soils, greenhouse gas emissions, hazard/hazardous materials, hydrology and water quality and land use/planning were identified. Conditions of Approval have been incorporated into the proposed project to assure compliance with County requirements to the extent that they mitigate the identified potential impacts. Therefore, mitigations were not necessary for the proposed project to have a less than significant impact on these resources.

### Less Than Significant Level with Mitigation Measures

Potential impacts to air quality, biological resources, tribal cultural resources and transportation caused by temporary construction activities and site excavation resulting from project implementation have been identified and mitigation measures have been recommended to reduce these impacts to a less than significant level.

### **Air Quality**

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).

During the construction of the project, the 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<sub>10</sub> emissions that exceed the air district thresholds. For projects where construction-related emissions exceed the air district thresholds PM<sub>10</sub>, 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 Condition No. 11 – Mitigation Measure No.1, would reduce this impact to less than significant.

## Biological Resources

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). As stated within the Biological Resources Assessment written by WRA Environmental Consultants (Finding 2, Evidence “c”), 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 (CFGF), 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 [Page 4 of the Biological Resources Assessment by WRA Environmental Consultants (LIB190262)].

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 (CNDDDB), USFWS Information for Planning and Conservation Species Lists, CNPS Inventory records, and other Biological Studies conducted on or adjacent to the project site.

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 as identified within the Biological Resources Assessment prepared by WRA biologists (Applicant’s Biologist). No critical habitat for federally listed species is present in the project site. Although Monterey County GIS did not identify any ESHA within the site, CDFW has identified findings of special status species such as peregrine falcon, California Tiger Salamander (CTS) and Santa Cruz Long-Toed Salamander (SCLTS) within the project vicinity. Therefore, regulatory conditions and a mitigation measure was incorporated into the project to ensure a bird nesting survey is completed, and training is conducted if any CTS and/or SCLTS is encountered.

The CDFW expressed concerns about the potential presence of Santa Cruz Long Toed Salamander (SCLTS), California Tiger Salamander (CTS), and peregrine falcon (*Falco peregrinus anatum*) 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, though unlikely, suitable aquatic or upland habitat for SCLTS and CTS may be present. The County has reviewed this information and with previous discussions with CDFW, the County concurs with the findings of the biologists based on its own independent judgement. A mitigation measure (Condition No. 12 – Mitigation Measure No.2) has been incorporated as a part of the project to ensure impacts are reduced to a less than significant level.

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 (Act), a regulatory 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. If any nesting birds are found, the applicant shall contact a County approved biologist to develop a buffer plan. This standard condition of approval is a regulatory condition required by state regulations. The Act requires the protection of migratory bird species such as peregrine falcon.

### **Tribal Cultural Resources**

Monterey County Geographic Information System (GIS) indicates that the development area is within an area of high archaeological sensitivity and in accordance with CIP Section 20.144.110.B.1.a, an archaeological assessment was prepared and submitted for the project. This assessment relied on previous studies prepared for MLPP as well as site specific reconnaissance and identified that the proposed excavation area for the substation has been previously disturbed from previous infrastructure installation to a depth of 20 feet.

The site is in the aboriginal territory of the Ohlone/Coastanoan-Esselen Nation (OCEN) and in accordance with Public Resource Code Section 21080.3.1, tribal consultation between OCEN and County Staff occurred on March 10, 2020. During consultation, OCEN requested the mitigation measure provided below (**Mitigation Measure No. 3 in Exhibit C**) 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.

### **Transportation**

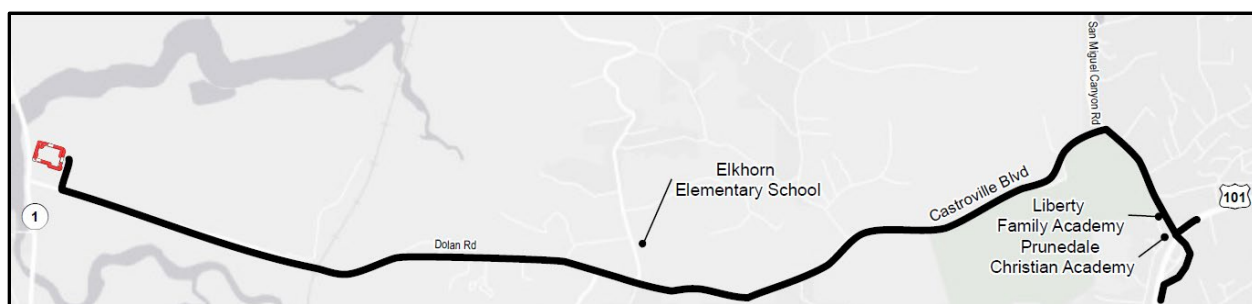
MLCP Section 5.2.2 states that the primary transportation emphasis of the Coastal Act is to preserve highway capacity for coastal access and coastal dependent land uses and recommends a reduction in the number access points from the Highway 1 to minimize hazardous and congested conditions. The power plant is a coastal dependent land use because it has historically used seawater intake pipes in the energy generation use at the site. The North County Coastal Implementation Plan (CIP) Section 20.144.120.A.1 requires a traffic study for all development proposals with potential to significantly impact the service level or safety along Highway 1. In accordance with the provisions of the CIP, a traffic assessment was submitted with the project application. Historical vehicular access on and off the MLPP, is provided along Highway 1 and Dolan Road. Primary access is through a driveway entrance off Dolan Road, approximately ¾ of a 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.

The Traffic Assessment prepared by Keith Higgins (LIB200114) indicated that compared to the existing site conditions, the project would not create a new impact. The operational component of the project would utilize the current employees on the site and would therefore not generate any new vehicle trips. The existing operational site conditions consists of between 30 to 60 employees during a typical workday. However, during routine repair and maintenance operations, which occur periodically throughout the year, there may be up to 420 employees at the MLPP as stated with the Traffic Assessment. This is the baseline which was utilized in the Traffic Assessment. During the installation component of the project, there will be increased employees during your typical workday. This would only be temporary and would not increase the baseline of 420 employees that would be present during routine repair and maintenance operations.

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 BESS, 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 Traffic Assessment outlines a Construction Management Plan (CMP) that identifies strategic initiatives to ensure that the numbers do not exceed this amount.

The CMP illustrates a vehicle trip route (**Figure 5**) that would be utilized from subject property, to Dolan Road, to Castroville Boulevard, to San Miguel Canyon Road, to Highway 101 and vice versa.



**Figure 5. Haul Routes**

The CMP has been developed to address the temporary traffic impacts within the intention of reducing any potential impact to a less than significant level. In addition to the traffic route that avoids traveling on Highway 1, the CMP outlines the following traffic management actions:

- Encourage carpooling
- Schedule shift changes for construction worker during off-peak hours.

- Enforce a policy of one site entrance per day per vehicle.
- Schedule deliveries of construction materials during off-peak hours.
- Limit total combined daily employees for construction of the BESS Project and ongoing maintenance of existing MLPP operations to the existing total of 420 per day.
- Prohibit the use of Highway 1 for construction personnel and deliveries
- Monterey County Public Works Department will have the discretion to require the use of California Highway Patrol during Battery Project shift changes.

The strategies contained in the CMP would reduce or eliminate peak hour construction impacts and limit the amount of construction employees on the site to a maximum of 420, which is the established existing baseline condition. The project has been conditioned for the applicant to submit a final CMP that outlines these initiatives and monitors them to ensure their compliance (Condition No. 10). Construction trips are temporary and will be controlled to avoid peak hour trips and Highway 1. Therefore, the proposed project mitigates potential impacts relative to traffic to a less than significant level. No additional mitigation measures are required. RMA-Public Works and Facilities have recommended a standard Condition of Approval requiring the applicant to submit a Final Construction Management Plan prior to issuance of construction permits. This would ensure proper implementation of the CMP.

#### COMMENTS RECEIVED DURING IS/MND CIRCULATION:

Two comments were received for the IS/MND (SCH. No. 2020050309). Comments from the California Department of Transportation (Caltrans) and Molly Erickson representing Friends, Artists, and Neighbors of the Elkhorn Slough (FANS) and The Open Monterey Project (TOMP) were received. These comments are discussed below.

#### **California Department of Transportation (Caltrans)**

“Caltrans appreciates the CMP initiatives and requests that a form of monitoring plan or report be incorporated for the duration of the project to evaluate the strategy and ensure compliance.” Further if any work were to be done in the State-right-of-way (Highway 1), an encroachment permit from Caltrans would be required. The project has been conditioned (Condition No. 10) for the CMP to include a monitoring report to ensure compliance and prior to the final of a construction permit, a final report shall be submitted to RMA-Planning that documents the mitigation measures implemented and their success. This Condition of Approval addresses Caltrans comments and no issues remain.

#### **Molly Erickson Representing FANS and TOMP**

FANS and TOMP, represented by Ms. Erickson had a phone call with RMA staff during the IS comment period in which she requested clarification about information in the IS/proposed MND and had questions concerning coastal-dependency, transmission towers, monopoles, exterior lighting, landfill location and a birds flying analysis.. Responses to issues raised are summarized as follows:



*Coastal-Dependency – a question was raised as to whether the project is a coastal dependent use*

Page 16 of the Initial Study, Section III for Project Consistency and Section IV. Environmental Factors, Evidence VI.11 Land Use/Planning discusses how the project is consistent with the heavy industrial coastal dependent zoning designation.

Further, Moss Landing Community Plan (MLCP) Figure 2 identifies the land use designation for the subject property as a Heavy Industrial – Coastal Dependent. MLCP Section 5.2.1.A – Coastal Dependent Industry, describes existing industries in Moss Landing and states that they “are generally dependent for their existence upon a location near the coastline, and as such are considered ‘coastal dependent’. These industries include commercial fishing, aquaculture, energy facilities and manufacturing facilities.” This section recognizes that coastal dependent facilities shall be encouraged to expand within existing sites, and shall be allowed for growth consistent with the protection of the area’s natural resources. MLCP Section 5.2.1.A.2 identifies full buildout of the Moss Landing Power Plant and refers to policies contained in MLCP Section 5.5 for upgrading energy facilities. CIP Section 20.144.160.C.1.a states that coastal dependent industrial facilities should be encouraged to expand within existing sites before off-site expansion shall be considered. The project proposes to establish a Battery Energy Storage System (BESS) within an existing industrial site that has an approved BESS in construction. Since the MLCP identifies energy facility as coastal dependent and the project is to expand within the existing site; the project, as proposed, is consistent with land use requirements for energy facilities and industrial development within the MLCP.

*Transmission Towers – Questions were raised regarding what was considered a “tower”, which ones were existing and what the details and use of the towers on PG&E’s site were.*

The transmission towers or “towers” are the two-legged structures that transmit energy to and from the site. The property has two types of transmission towers, 500 kV and 230 kV. As illustrated in **Figure 3** above, there are three (3) 100-foot existing 500 kV transmission towers and about 12 100-foot 230 kV transmission towers along with connected transmission lines. The 230 kV transmission towers will not be modified as a part of this application. However, two (2) of the three (3) existing transmission towers and transmission lines as identified on the plans will be removed. Up to four (4) 150-foot monopoles will be installed as identified on the plans with appendages exceeding 20 feet from the pole, connecting transmission lines from substation infrastructure the PG&E site, adjacent to this property.

PG&E has two existing 500kV transmission towers that connects to this project and may need to be replaced with similar or less intrusive towers in the same general location as illustrated in **Figure 3**. The transmission towers are utilized to transmit the energy to and/or from the electrically grid. Although, the IS/MND identifies this, the replacement, if required, would need a separate planning entitlement from the County and is not a part of this application.

*Monopoles – Questions were raised regarding the dimensions, detail and locations of the proposed monopoles.*

There are currently no monopoles on the existing site. There are up to four (4) monopoles included as a part of this application. As illustrated in **Figure 3** above and the plans in **Exhibit C**, the monopoles would be 150 feet in height above ground and 50 feet in depth below ground. The diameter of each pole will be approximately 7 feet, and would taper to 3 feet as you reach the top of the pole. Appendages for each pole will be about 20 feet. These are not considered towers and discussed above. The monopoles will be located within the area of where one of the proposed transmission towers are to be removed, and would be utilized to connect energy from one of the substations to the PG&E transmission towers. The monopoles are not considered towers.

*Exterior Lighting – A question was raised as to whether the transmission towers and/or monopoles would have lighting.*

The project does not propose exterior lighting for the existing transmission towers and proposed monopoles. Motion sensor exterior lighting is proposed for the each of the four buildings and each substation area for egress and ingress. The lighting would be consistent compared to the existing industrial site. A standard condition of approval has been applied to the project to ensure the lighting chosen is downlit and in compliance with County requirements.

*Landfill Location – The questions was raised as to what landfill the waste will be hauled off to.*

The project proposes to utilized the Monterey Peninsula Landfill to dispose of any waste.

*Birds-Flying Analysis – The question was raised as to whether a bird-flying analysis was completed for the area of the proposed monopoles.*

The project site is an existing active industrial site with infrastructures such as a 75-foot three-story building, two 500-foot smokestacks, four 145-foot smokestacks, 100-foot transmission towers and connected transmission lines. The existing two 500 kV transmission towers proposed to be removed have transmission lines that connect to one another that crosses the property as illustrated in **Figure 3**. Further, the existing transmission tower that is to remain has transmission lines that run across the property connecting to the PG&E site. The monopoles would be located towards the location of one of the proposed towers to be removed. Within this area, adjacent to the monopoles are 230 kV transmission towers that are 100-feet in height and have connected transmission lines. A biological report was prepared and submitted for the project; however, it did not include bird-flying analysis. Compared to existing site conditions, staff found that the proposed project was consistent with what already exists on the site and the need for a birds flying analysis was not warranted. The area of the proposed monopoles will be located where one of the proposed transmission towers are to be removed. The transmission tower has existing transmission lines that run across the property, connected to the other transmission tower proposed to be removed. There is existing infrastructure adjacent to the proposed monopoles. On the property adjacent to the monopoles, are existing 230 kV transmission towers with connect transmission lines. On the other side of the monopoles is the PG&E property that has existing transmission

towers with transmission lines. Compared to the existing surroundings, staff found the proposed monopoles would not create a new impact.

#### AMPLIFICATION/CLARIFICATION

An Initial Study/Mitigated Negative Declaration or “IS/MND” (SCH No. 2020050309) for the project was prepared and circulated from May 15, 2020 through June 15, 2020. Comments from California Department of Transportation (Caltrans) and Molly Erickson representing FANS and TOMP were received during the public review comment period (**Exhibit H**). Revisions to the IS/MND were made to clarify and amplify information, and pursuant to CEQA Guideline Section 15073.5 (c)(4), recirculation is not required for such revision. The revisions include: new figures to clearly illustrate what is existing and what is proposed, location of all monopoles and language to clarify the dimensions and details of the monopoles, the existing transmission towers and that no exterior lighting was proposed for the monopoles and transmission towers. The revisions did not result in the addition of any conditions or mitigation measures that were not already identified. A redline version of the revisions are provided in **Exhibit E**.