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Draft Mitigated Negative Declaration 19NGD-00000-00017

Orni 34 LLC Local Grid Resiliency Project Battery Energy Storage System

19CUP-00000-00008, 19DVP-00000-00013, and 19CDP-00000-00009

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1.0 REQUEST/PROJECT DESCRIPTION

The project is a request of Orni 34 LLC for a Conditional Use Permit, Development Plan, and Coastal Development Permit to allow construction of a 10 megawatt (MW) Battery Energy Storage System (BESS) on approximately one acre within a 13.03-acre agricultural parcel in the unincorporated area near the City of Carpinteria (see Appendix 1 for vicinity map). The Project would provide additional capacity to the electrical grid during periods when traditional sources of electrical generation are not producing power. The Project also would increase the electrical reliability and stability of the local grid by storing electricity from the grid-based electrical generation systems and then releasing the power to the grid during periods when electricity is needed (peak demand and potentially power outages), thereby reducing the need to operate fossil-fuel powered systems and reducing the consumption of fossil fuels and emissions of greenhouse gases.

As proposed, the BESS development would bring the total area of development on the parcel to 34,720 square feet, not including access road and driveway. Access to the pad would be provided from the existing paved private road portion of Foothill Road and a proposed new 16-foot wide driveway with a chain link gate to be located at the pad entrance. Total grading, including the new access driveway, would be about 2,100 cubic yards of cut and 150 cubic yards of fill.

The BESS would be installed on a 15,120 square foot concrete pad and consist of 15 self-contained energy storage and management cabinets ("Megapacks"), four transformers, and controls and switchgear. Each Megapack unit would be approximately 8.75 feet in height and would hold 17 battery modules; each module would hold approximately 12,636 battery cells. Inverters to convert the direct current (DC) electricity of the battery systems to the alternating current (AC) used by the electrical grid would be located within each Megapack. In addition, there would be a liquid thermal cooling system integrated into the cabinets to provide the necessary cooling to the batteries and power electronics. As an added safety feature, the cabinets are also designed to limit or eliminate the spread of fire from one cabinet to another.

The 15,120 square foot concrete pad would be enclosed on three sides (west, south and east) by an 8-foot tall wood fence. The north side of the pad would have a chain link fence. Vehicle impact bollards would be installed to reduce the potential for vehicle impacts to the batteries during operation. Stormwater from the pad would be directed into a new bioretention basin of approximately 8,000 square feet and 2.5 feet in depth to be located to the west of the proposed pad. Approximately five light poles would be located on the pad. The mounting height would be 12 feet and lights would be directed downward, dimmed at night, and on motion sensors.

During installation of the Megapacks and major maintenance on batteries, the battery and nearby potentially affected batteries would be maintained below a 30% state of charge to reduce the potential for accidental damage to the batteries. The facility would be equipped with monitoring equipment to detect fires and off-gassed materials and would alarm to an offsite, staffed location via a Supervisory Control and Data Acquisition (SCADA) system, and would initiate an audible and visual signal. Detection equipment would be placed between the Megapacks and the closest sensitive receptor and would include the use of a fire/flame detector, such as a Det-Tronics x3302 and a gas detector, such as a Det-Tronics CGS gas detector, or equivalents. The infrared (IR) detector and gas detector would be mounted on a 12-foot pole located on the pad west of the Megapacks.

The BESS would connect to the grid via an underground power line to one new 45-foot-tall Class 1 composite or wood power pole which would be installed approximately 15 feet north of the existing power pole by the mailboxes at the southeast corner of the project site. From there, an overhead line would branch down the east side of the property and connect to the existing overhead 16 kV SCE powerlines along the southern property boundary in the Foothill Road right-of-way, replacing approximately 90 feet of existing 16 kV conductor with covered conductor.

Water for dust control during construction would be provided by the contractor and trucked from an offsite source, with an estimated 20 to 40 water truck trips needed for construction. Water for fire

suppression purposes would be provided via existing fire hydrants on Foothill Road and Seacoast Way. The proposed project is an unstaffed electrical utility facility and no walk-in or habitable structures are proposed; therefore, no water or sewer connections are required or proposed.

After initial construction, occasional inspection and maintenance would occur by a small number of employees. On average, the site would be inspected or maintained 18 times per year. Personnel would typically consist of one or two people, with a larger team of three to five people onsite twice per year.

The Project parcel is currently used for agricultural purposes, with an approximately 19,500-square foot warehouse building and an associated parking/loading and driveway area. The existing warehouse is approximately 500 feet north of the proposed Project site. The subject parcel is identified as Assessor's Parcel Number 004-004-037, zoned AG-1-10 totaling 13.03 acres, and located at 5134 Foothill Road in Carpinteria, CA, First Supervisorial District.

2.0 PROJECT SITE INFORMATION

Table 2-1. Project Site Information	
APN; Address	004-004-037; 5134 Foothill Road, Carpinteria, CA
Comprehensive Plan Designation	A-I, Agriculture
Zoning District, Ordinance	A-I-10, Agriculture, Minimum Lot Size 10 acres, Carpinteria Agricultural Overlay, Flood Recovery Map High Hazard Area
Site Size	Parcel Gross: 13.03 acres. Project Site Net: One acre.
Present Use & Development	Agriculture, agricultural warehouse, utility
Surrounding Uses/Zoning	North: Agriculture warehouse, Orchards, Greenhouses South: Residential (City of Carpinteria); South Coast Conduit East: Agriculture West: Church, Nursery, Greenhouses, Rural Residential, South Coast Conduit
Access	Private driveway, Foothill Road between Casitas Pass Road and Linden Ave.
Public Services	Water: Water not required for Project operations; construction water trucked to site. Sewage: Carpinteria Sanitary District; sewer not required for Project Fire: Carpinteria/Summerland Fire District, Station 1, 911 Walnut Ave. Police: SB County Sheriff, Carpinteria Station, 4180 Via Real

3.0 ENVIRONMENTAL SETTING

3.1 PHYSICAL SETTING

The proposed Project site is located in an unincorporated area of the County in the coastal zone within a 13.03-acre, relatively flat agricultural parcel at approximately 40 feet above sea level. Parcels within the City of Carpinteria and in the unincorporated area are located near the site. Surrounding uses are agriculture, including greenhouses to the north, northwest, and east, an agricultural warehouse on the same parcel to the north, residences to the south and a church to the west. A private portion of Foothill Road runs north-south along the eastern parcel boundary. Foothill Road/Hwy Highway 192 runs east-west along the parcel's southern boundary. The South Coast Conduit corridor also runs east-west along Foothill Road/Hwy 192 immediately south of the Project site. The site currently is developed with an aggregate total of 19,600 square feet of agricultural structures and is located approximately 600 feet east of the existing SCE Carpinteria substation.

Flora and Fauna. The following information is summarized from the April 2019 Biological Report and June 2019 Preliminary Jurisdictional Wetlands Report prepared by the applicant. These reports are

provided in Appendix 2 to this Mitigated Negative Declaration. The Project site is currently fallow and is disked regularly for weed control purposes. Vegetation observed during the Project biological field survey (September 2018) was mostly non-native common plant species characteristic of disturbed areas in the coastal ranges and valleys of southern California. Based on the lack of vegetation and absence of native plant communities, habitat conditions within the Project site are of generally poor quality. A well-established monoculture of non-native tree species dominates the existing tree canopy along portions of the southwest perimeter of the parcel, and lower strata generally comprise non-native grasses and non-native herbaceous plants.

Suitable habitat for most special-status species does not occur on the site and the likelihood for most special status invertebrates, amphibians, and fish to occur within the site is low to moderate. It is possible that species such as Pacific treefrog (chorus frog, *Pseudacris regilla*) and western toad (*Anaxyrus boreas*) may be present in a nearby tributary to Franklin Creek during periods of higher flow during the rainy season, generally from November through March, and therefore may transit the site. No special-status wildlife species were observed onsite during the survey; however, there is a high potential for one bat species, *Corynorthinus townsendii*, to occur on the site when foraging.

Common mammals would be expected to occur within the Project site, given the habitat conditions and species that are known to occur in the region. These could include: California ground squirrel (S*permophilus beecheyi*), Audubon's cottontail rabbit (*Sylvilagus audubonii*), Virginia opossum (*Didelphis virginiana*), coyote (*Canis latrans*), raccoon (*Procyon lotor*) and striped skunk (*Mephitis mephitis*).

Bird species observed included black phoebe (*Sayornis nigricans*), Amerian crow (*Corvus brachyrynchos*), common raven (*Corvus corax*), Anna's hummingbird (*Calypte anna*), and house finch (*Haemorhous mexicanus*). Suitable habitat conditions for a number of common birds including mourning dove (*Zenaida macroura*), bushtit (*Psaltriparus minimus*), lesser goldfinch (*Spinus psaltria*), and Bewick's wren (*Thryomanes bewickii*) exist at and near the site and it is possible that many other birds use the site, either as wintering habitat, seasonal breeding, or as occasional migrants.

Archaeological Sites. The Project site itself has been used for growing and packaging flowers since the mid-to-late 1960s. The site was investigated in 1999 (Stone and Haslouer) for the existing agricultural building to the north and in 2018 for the proposed Project (Stantec). No cultural resources or archaeological sites have been recorded within the Project parcel.

Soils. A single soil type has been mapped within the Project site: Camarillo, variant, fine sandy loam. This poorly drained soil is characteristic of floodplains and consists of alluvium derived from calcareous sedimentary rock.

Surface Water Bodies. Franklin Creek flows into the Carpinteria Salt Marsh, which is tidally influenced from the Pacific Ocean, approximately one mile southwest of the site. An unnamed tributary to Franklin Creek, which collects runoff from agricultural operations in the area, runs parallel to the southern boundary of the Project parcel but is outside of it. Based on the Preliminary Jurisdictional Wetlands Report provided by the applicant (see Appendix 2), three potential jurisdictional features occur within the biological study area for the Project: (1) USACE/RWQCB[1] non-wetland waters of the U.S. (0.30 acre), (2) CDFW[2] jurisdictional waters (0.34 acre), and (3) CCC[3] wetlands (0.26 acre). Jurisdictional features include two shallow agricultural ditches along the eastern and western boundaries of the Project parcel and the concrete-lined drainage canal to the south, which is mapped by the National Wetlands Inventory as Riverine (R4SBCx).

Existing Structures. There are no existing structures within the Project site. An agricultural building is located on the same parcel, about 500 feet north of the proposed battery storage pad.

[1] U.S. Army Corps of Engineers/Regional Water Quality Control Board
[2] California Department of Fish and Wildlife
[3] California Coastal Commission

3.2 ENVIRONMENTAL BASELINE

The environmental baseline from which the Project's impacts are measured consists of the physical environmental conditions in the vicinity of the Project, as described above.

4.0 POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST

The following checklist (Sections 4.1 through 4.15 below) indicates the potential levels of Project-related impacts which, are defined as follows:

Potentially Significant Impact: A fair argument can be made, based on the substantial evidence in the file, that an effect may be significant.

Less Than Significant Impact with Mitigation: Incorporation of mitigation measures has reduced an effect from a Potentially Significant Impact to a Less Than Significant Impact.

Less Than Significant Impact: An impact is considered adverse but does not trigger a significance threshold.

No Impact: There is adequate support that the referenced information sources show that the impact simply does not apply to the subject Project.

Reviewed Under Previous Document: The analysis contained in a previously adopted/certified environmental document addresses this issue adequately for use in the current case and is summarized in the discussion below. The discussion should include reference to the previous documents, a citation of the page(s) where the information is found, and identification of mitigation measures incorporated from the previous documents.

4.1 AESTHETICS/VISUAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. The obstruction of any scenic vista or view open to the public or the creation of an aesthetically offensive site open to public view?				**X**	
b. Change to the visual character of an area?				**X**	
c. Glare or night lighting which may affect adjoining areas?		**X**			
d. Visually incompatible structures?		**X**			

Existing Setting: The Project site is located on flat ground at 5134 Foothill Road, just north and east of the City of Carpinteria boundary. Public views in this area are dominated by multiple urban and rural structures such as residences, a church and agricultural buildings in the near view and agricultural uses on steeper slopes in the background to the north. Public views of the site are limited to the immediate neighboring properties to the west and south and roadways fronting the property. Views from Foothill Road/Hwy 192 are partially screened by vegetation. Figures 1 through 5 show views toward the site from public areas.

Figure 1. Looking northwest from the southeast corner of the site.

Figure 2. Looking west along Foothill Road/Hwy 192 from southeast site boundary. Flood Control concrete-lined channel occurs between the site (at right) and the north edge of Foothill Road (at left). Existing hedgerow (upper right) would remain in place.

Figure 3. Looking west from the Project site entrance at southern site boundary. Project would ultimately tie-in to the overhead power line along Foothill Road/Hwy 192.

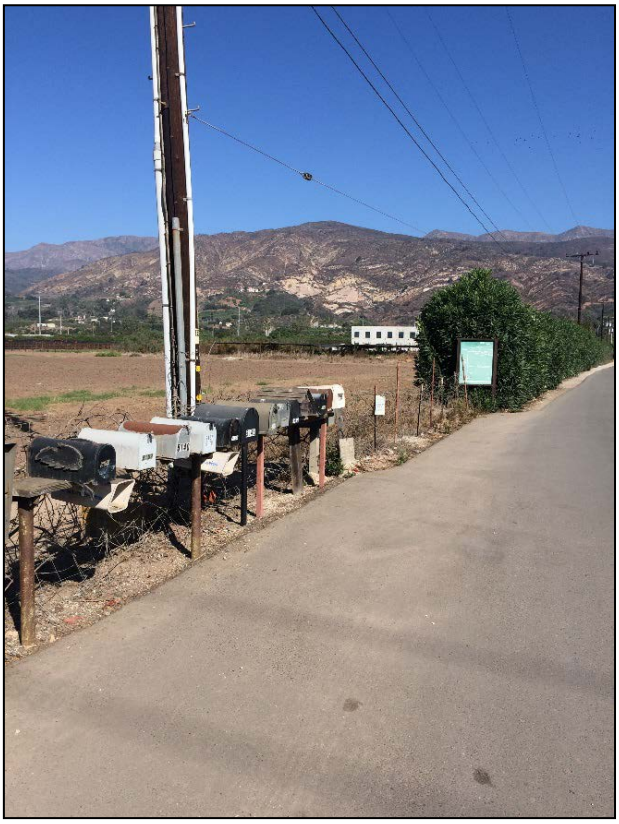


Figure 4. Looking northwest onto the site from the existing entrance roadway.

Figure 5. Looking north along the entrance roadway just east of the site. The existing hedgerow (at left) would remain in place.

Environmental Thresholds. The County's Visual Aesthetics Impact Guidelines classify coastal and mountainous areas, the urban fringe, and travel corridors as "especially important" visual resources. A project may have the potential to create a significantly adverse aesthetic impact if (among other potential effects) it would impact important visual resources, obstruct public views, remove significant amounts of vegetation, substantially alter the natural character of the landscape, or involve extensive grading visible from public areas. The guidelines address public, not private, views.

Impact Discussion *(a through d)*: Components of the proposed Project to be installed on the concrete pad are (1) fifteen, 8.75-ft high, self-contained energy storage and management cabinets (Megapacks) holding the battery modules, (2) four transformers, and (3) controls and electrical switchgear. An 8-ft high fence would be installed around the concrete pad for security purposes and to screen views from public viewing areas along Foothill Road/Hwy 192. The fence would be wood along the east, south, and west sides of the pad and chain link along the north side. A new underground power line on the site would connect to the existing SCE power lines along the eastern parcel boundary and from there via overhead lines to the power lines running along Foothill Road /Hwy 192 adjacent to the southern Project parcel boundary. Minimal night lighting would be installed for security purposes. Lighting fixtures would be directed downward and equipped with motion sensor and dimmer. These components are shown in Figure 6 (Plot Plan) and Figure 7 (Site Elevations) and an example of the proposed lighting fixture is provided in Figure 8 (Site Lighting). The South Board of Architectural Review (SBAR) has conceptually reviewed the Project and will review and approve final fencing and exterior lighting design if the Project is approved. Due to the low profile of Project components, screening of the components with fencing and existing vegetation, no significant visual resource impacts are expected to occur. The interconnection to the existing SCE power lines would not result in a substantial long-term change to the visual landscape

nor would it be a visually incompatible structure in the context of the existing power lines and nearby SCE Carpinteria Substation.

Cumulative Impacts: The implementation of the Project is not anticipated to result in any substantial change in the aesthetic character of the area due to its low profile and limited visibility from public areas. Thus, the Project would not have a cumulatively considerable effect on aesthetics.

Mitigation and Residual Impacts: The following measures would ensure that the Project's aesthetic impacts would not be significant:

MM VIS-1. **BAR Required**. The Owner/Applicant shall obtain Board of Architectural Review (BAR) approval for project design. All project elements (e.g., design, scale, character, colors, materials and screening) shall be compatible with other development in the vicinity and shall conform in all respects to conceptual BAR approval (19BAR-00000-00130). **TIMING**: The Owner/Applicant shall submit architectural drawings of the project for review and shall obtain final BAR approval prior to issuance of the Coastal Development Permit. Grading plans shall be submitted to P&D concurrent with or prior to BAR plan filing. **MONITORING**: The Owner/Applicant shall demonstrate to P&D compliance monitoring staff that the project has been built consistent with approved BAR design and screening plans prior to issuance of the Coastal Development Permit.

MM VIS-2. **Lighting.** The Owner/Applicant shall ensure any exterior night lighting installed on the project site is of low intensity, low glare design, minimum height, and shall be hooded to direct light downward onto the subject lot and prevent spillover onto adjacent lots. The Owner/Applicant shall install timers or otherwise ensure lights are dimmed after 10 p.m. **PLAN REQUIREMENTS**: The Owner/Applicant shall develop a Lighting Plan for BAR approval incorporating these requirements and showing locations and height of all exterior lighting fixtures with arrows showing the direction of light being cast by each fixture. **TIMING**: Lighting shall be installed in compliance with this measure prior to issuance of the Coastal Development Permit. **MONITORING:** P&D and BAR shall review the lighting plan for compliance with this measure prior to approval of the Coastal Development Permit. P&D Permit Compliance staff shall inspect structures upon completion to ensure that exterior lighting fixtures have been installed consistent with their depiction on the final plans.

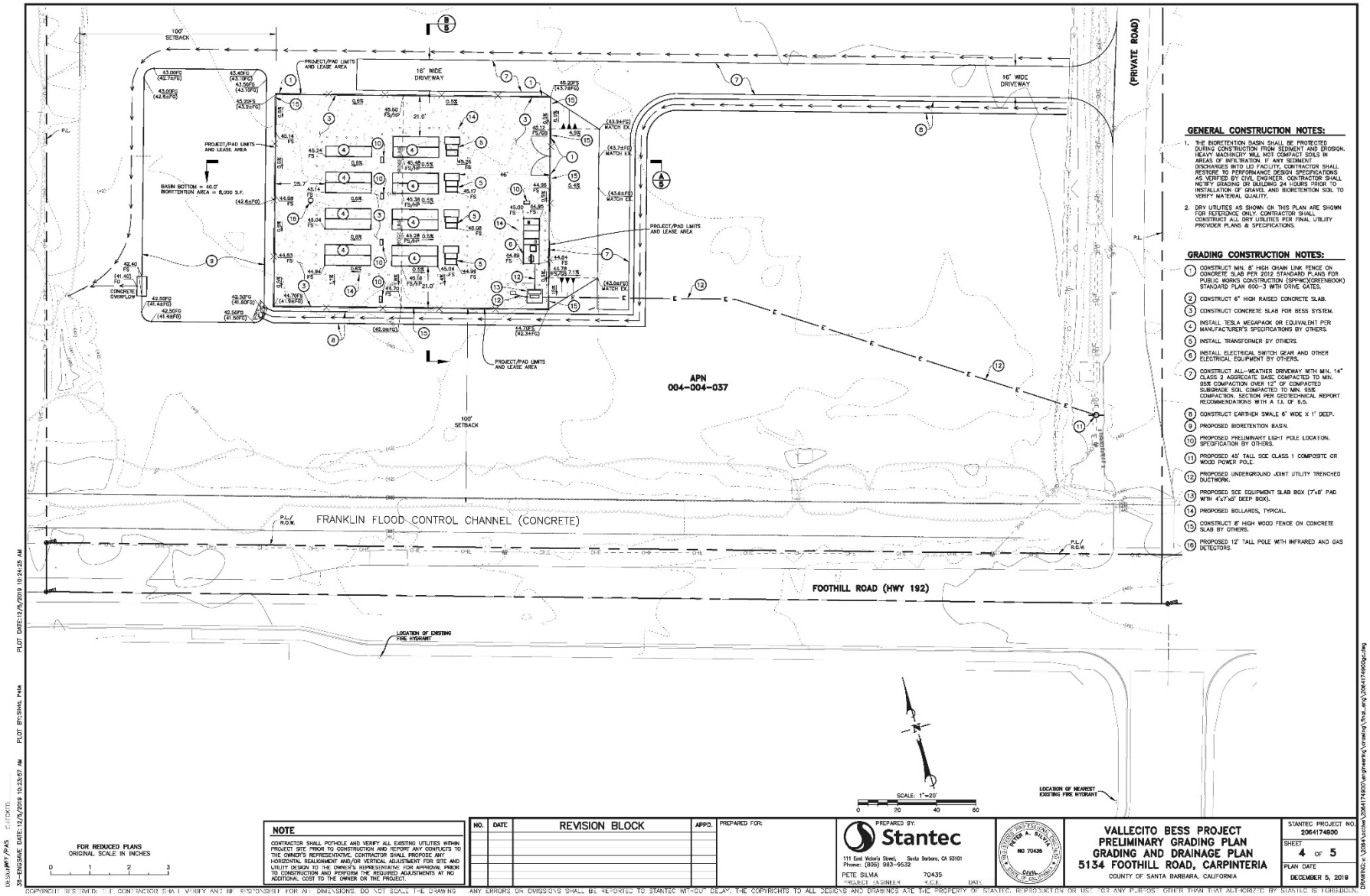
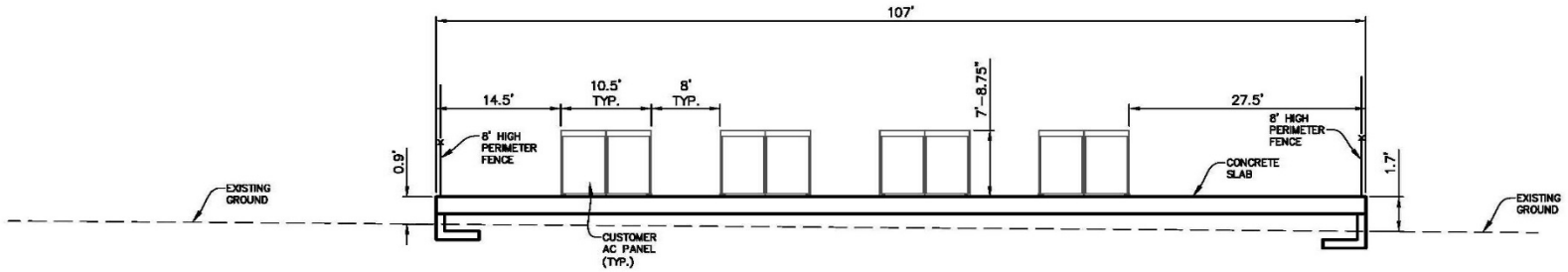
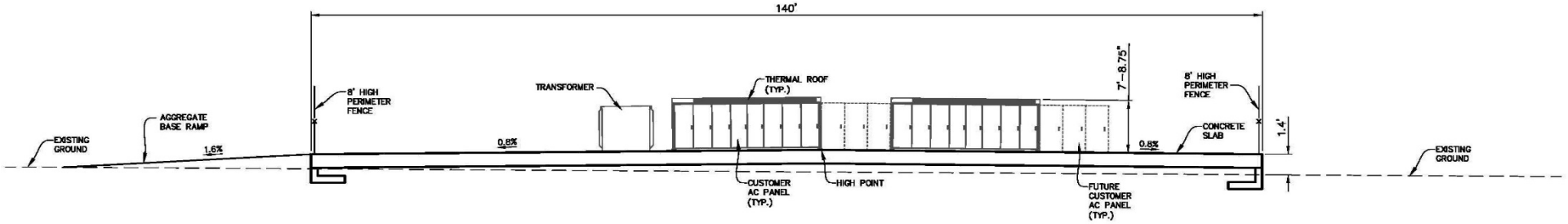


Figure 6. Plot Plan



BESS SYSTEM SITE ELEVATION (LOOKING EAST) B/5
NOT TO SCALE



BESS SYSTEM SITE ELEVATION (LOOKING SOUTH) A/5
NOT TO SCALE

Figure 7 Orni 34 BESS System Site Elevations

Figure 8. Orni 34 BESS System Site Lighting Example

4.2 AGRICULTURAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Convert prime agricultural land to non-agricultural use, impair agricultural land productivity (whether prime or non-prime) or conflict with agricultural preserve programs?				**X**	
b. An effect upon any unique or other farmland of State or Local Importance?				**X**	

Existing Setting: Agricultural lands play a critical economic and environmental role in Santa Barbara County. Agriculture continues to be Santa Barbara County's major producing industry with a gross production value of over $1.5 billion (Santa Barbara County Agricultural Production Report, 2018[4]). In addition to the creation of food, jobs, and economic value, farmland provides valuable open space and maintains the County's rural character. Agricultural operations on the parcel include a warehouse and

[4] https://countyofsb.org/uploadedFiles/agcomm/Content/Other/crops/2018.pdf

some non-row crop plantings. The parcel has historically been used for growing flowers and was once in an Agricultural Preserve. The parcel came out of the Williamson Act (Ag Preserve) contract effective January 1, 2018. No crops or agricultural buildings are currently located on the approximately one acre where the BESS would be installed. The Project parcel is not designated as Important Farmland and the Project site does not contain a combination of acreage and/or soils that would render the site an important agricultural resource.

Impact Discussion *(a, b)*: The Project would not convert prime agricultural land to non-agricultural use, nor would it affect neighboring agricultural operations and portions of the parcel not occupied by the BESS could continue in agricultural use.

Mitigation and Residual Impact: No impacts are identified. No mitigations are necessary.

4.3a AIR QUALITY

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. The violation of any ambient air quality standard, a substantial contribution to an existing or projected air quality violation, or exposure of sensitive receptors to substantial pollutant concentrations (emissions from direct, indirect, mobile and stationary sources)?				**X**	
b. The creation of objectionable smoke, ash or odors?				**X**	
c. Extensive dust generation?		**X**			

Existing Setting: The project site is located within the South Central Coast Air Basin, which includes Ventura County, Santa Barbara County, and San Luis Obispo County, and is within the jurisdictional boundaries of the Santa Barbara County Air Pollution Control District (SBCAPCD). Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants that are evaluated include reactive organic compounds (ROCs; also referred to as volatile organic compounds (VOCs)), oxides of nitrogen (NOx), carbon monoxide (CO), sulfur oxides (SOx), particulate matter with an aerodynamic diameter less than or equal to 10 microns in size (PM10), and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns in size (PM2.5). ROCs and NOx are important because they are precursors to ozone (O3).

Environmental Threshold: Chapter 5 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (published March 2018) addresses the subject of air quality. The thresholds provide that a proposed project will not have a significant impact on air quality if operation of the project will:

- emit (from all project sources, mobile and stationary) less than the daily trigger for offsets for any pollutant (currently 55 pounds per day for NOx and ROC, and 80 pounds per day for PM_{10});
- emit less than 25 pounds per day of oxides of nitrogen (NOx) or reactive organic compounds (ROC) from motor vehicle trips only;
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone);
- not exceed the APCD health risk public notification thresholds adopted by the APCD Board; and
- be consistent with the adopted federal and state Air Quality Plans.

No thresholds have been established for short-term impacts associated with construction activities. However, the County's Grading Ordinance requires standard dust control conditions for all projects involving grading

activities. Long-term/operational emissions thresholds have been established to address mobile emissions (i.e., motor vehicle emissions) and stationary source emissions (i.e., stationary boilers, engines, and chemical or industrial processing operations that release pollutants).

Impact Discussion *(a-c)*: Short-Term Construction Impacts. Project grading would require approximately 2,100 cubic yards of cut and 150 cubic yards of fill. Earth-moving operations at the Project site would not have the potential to result in significant Project-specific short-term emissions of fugitive dust and $PM_{10,}$ with the implementation of standard dust control measures that are required for all new development in the County. These measures are incorporated in mitigation measure AQ-1, below.

Emissions of ozone precursors (NO_x and ROC) during Project construction would result primarily from the on-site use of heavy earthmoving equipment. State law requires use of construction equipment with engines greater than 50 brake horsepower to be registered with the state's portable equipment registration program (PERP) or to be specifically permitted through the APCD. Commercial off-road and on-road diesel vehicles are also subject to limits on engine idling time, generally five minutes or less. Due to the limited period of time that grading activities would occur on the Project site, construction-related emissions of NO_x and ROC would not be significant on a project-specific or cumulative basis. However, due to the non-attainment status of the air basin for ozone, the Project would implement measures recommended by the APCD to reduce construction-related emissions of ozone precursors to the extent feasible. Compliance with these measures is routinely required for all new development in the County. The measures are referenced in mitigation measure AQ-2, below and listed in Attachment B to the March 14, 2019 APCD letter, which is provided in Appendix 3 to this Mitigated Negative Declaration.

Long-Term Operational Emissions. The proposed equipment does not include stationary sources of emissions and there would be no pollutant emissions from the battery systems during normal operations. The BESS facility would not be staffed and mobile emissions during operations would be limited to those associated with up to about 18 site visits per year by personnel for maintenance and monitoring. Emissions of criteria pollutants would be negligible. Thus, long-term emissions that would result from Project-generated vehicle trips and stationary sources would be minimal under normal operating conditions.

Upset Condition Emissions: A battery storage facility has the potential to emit hazardous air pollutants if the batteries are exposed to damage or fire. The potential for the proposed Project to be damaged and emit hazardous pollutants is low and is discussed in more detail in Section 4.9 (Hazardous Materials / Risk of Upset), below.

Mitigation and Residual Impact: Implementation of standard conditions noted on the grading plan as implemented through Chapter 14 (Grading Ordinance) of the County Code, standard APCD conditions for dust control and diesel particulate and NOx emission reduction measures described in the APCD letter dated March 14, 2019 and mitigation measures AQ-1 and AQ-2 (below) would reduce potential short-term dust impacts to a less than significant level. The Project would not result in significant project-specific long-term air quality impacts and no additional mitigation measures are required.

MM AQ-1. Fugitive Dust Control. The Owner/Applicant shall comply with the following dust control measures included in the *Fugitive Dust Control Measures* attachment to the March 14, 2019 APCD letter (MND Appendix 3). These measures are intended to keep dust generated by the development activities to a minimum with a goal of retaining dust on the site and include the following:

a. During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, use water trucks or sprinkler systems to prevent dust from leaving the site and to create a crust after each day's activities cease.
b. During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
c. Wet down the construction area after work is completed for the day and whenever wind exceeds 15 mph.

d. When wind exceeds 15 mph, have site watered at least once each day including weekends and holidays.
e. Order increased watering as necessary to prevent transport of dust off-site.
f. Cover soil stockpiled for more than two days or treat with soil binders to prevent dust generation. Reapply as needed.
g. If the site is graded and left undeveloped for over four weeks, the Owner/Applicant shall immediately: (i) Seed and water to re-vegetate graded areas; and/or (ii) Spread soil binders; and/or; (iii) Employ any other method(s) deemed appropriate by P&D or APCD.
h. The Owner/Applicant, contractor or builder shall provide P&D monitoring staff and APCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to:
    1. Assure all dust control requirements are complied with including those covering weekends and holidays.
    2. Order increased watering as necessary to prevent transport of dust offsite.
    3. Attend the pre-construction meeting (if applicable).

PLAN REQUIREMENTS: These dust control requirements shall be noted on all grading and building plans. **TIMING**: The dust monitor shall be designated prior to issuance of the Coastal Development Permit and measures shall be printed on grading plan. The dust control components apply from the beginning of any grading or construction throughout all development activities until issuance of the Coastal Development Permit. **MONITORING**: P&D staff will ensure measures are on grading plans. P&D grading and building inspectors shall spot check; Grading and Building will ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

MM AQ-2. **Diesel Particulate and NOx Emission Reduction Measures**. The Owner/Applicant shall comply with the applicable recommended diesel exhaust and NOx control measures included in the *Diesel Particulate and NOx Emission Reduction Measures* attachment to the March 14, 2019 APCD letter (MND Appendix 3). **PLAN REQUIREMENTS and TIMING**: Applicant shall identify and print appropriate recommended measures on final grading and building plans for review and approval by P&D prior to issuance of the Coastal Development Permit. **MONITORING**: P&D staff will ensure measures are on grading plans and spot check during construction. APCD inspectors will respond to nuisance complaints.

4.3b AIR QUALITY - Greenhouse Gas Emissions

Greenhouse Gas Emissions - Will the project:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			**X**		
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				**X**	

Existing Setting: Greenhouse gases (GHG) include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3) (California Health and Safety Code, § 38505(g)). These gases create a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as "the greenhouse effect," human activities have accelerated

the generation of GHG emissions above pre-industrial levels (U.S. Global Change Research Program 2018). The global mean surface temperature increased by approximately 1.8°F (1°C) in the past 80 years, and is likely to reach a 2.7°F (1.5°C) increase between 2030 and 2050 at current global emission rates (IPCC 2018).

The largest source of GHG emissions from human activities in the United States is from fossil fuel combustion for electricity, heat, and transportation. Specifically, the *Inventory of U.S. Greenhouse Gasses and Sinks: 1990-2017* (U.S. Environmental Protection Agency 2019) states that the primary sources of GHG emissions from fossil fuel combustion in 2017 included electricity production (35%), transportation (36.5%), industry (27%), and commercial and residential end users (17-19%, respectively). Factoring in all sources of GHG emissions, the energy sector accounts for 84% of total emissions in addition to agricultural (8%), industrial processes (5.5%), and waste management (2%) sources.

The County of Santa Barbara's Final Environmental Impact Report for the Energy and Climate Action Plan (EIR) (PMC, 2015) and the *2016 Greenhouse Gas Emissions Inventory Update and Forecast* (County of Santa Barbara Long Range Planning Division, 2018) describe the proposed Project's existing regional setting as it pertains to GHG emissions. Regarding non-stationary sources of GHG emissions within Santa Barbara County specifically, the transportation sector produces 38% of the total emissions, followed by the building energy (28%), agriculture (14%), off-road equipment (11%), and solid waste (9%) sectors (County of Santa Barbara Long Range Planning Division 2018).

The overabundance of GHG in the atmosphere has led to a warming of the earth which has the potential to substantially change the earth's climate system. More frequent and intense weather and climate-related events are expected to damage infrastructure, ecosystems, and social systems across the United States (U.S. Global Change Research Program 2018). California's Central Coast, including Santa Barbara County, will be affected by changes in precipitation patterns, reduced foggy days, increased extreme heat days, exacerbated drought and wildfire conditions, and acceleration of sea level rise leading to increased coastal flooding and erosion (Langridge, Ruth 2018).

Global mean surface warming results from GHG emissions generated from many sources over time, rather than emissions generated by any one project (IPCC 2014). As defined in CEQA Guidelines Section 15355, and discussed in Section 15130, " 'Cumulative impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Therefore, by definition, climate change under CEQA is a cumulative impact.

CEQA Guidelines Section 15064.4(b) states that a lead agency "should focus its analysis on the reasonably foreseeable incremental contribution of the project's [GHG] emissions to the effects of climate change." A project's individual contribution may appear small but may still be cumulatively considerable. Therefore, it is not appropriate to determine the significance of an individual project's GHG emissions by comparing against state, local, or global emission rates. Instead, the Governor's Office of Planning and Research recommends using an established or recommended threshold as one method of determining significance during CEQA analysis (OPR 2008, 2018). A lead agency may determine that a project's incremental contribution to an existing cumulatively significant issue, such as climate change, is not significant based on supporting facts and analysis [CEQA Guidelines Section 15130(a)(2)].

Environmental Threshold: Santa Barbara County's Energy and Climate Action Plan (ECAP), adopted in 2015, is a GHG emission reduction plan. The County has been implementing the plan's emission reduction measures since 2016. However, the County is not projected to meet the 2020 GHG emission reduction goal contained within the plan, and the plan is going to be updated beginning in fiscal year 2019-2020. Therefore, at this time, a significance threshold is more appropriate for project-level GHG emission analysis, rather than tiering off the ECAP's Environmental Impact Report.

CEQA Guidelines Section 15064.4(a) states "A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project." CEQA Guidelines Section 15064.4(b) further states,

> A lead agency should consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:
>
> (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
>
> (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project…

The County of Santa Barbara does not have an adopted GHG emission significance threshold for sources other than industrial stationary sources. Therefore, significance thresholds from other California jurisdictions or agencies can be appropriately applied to land use projects within Santa Barbara County, as long as substantial evidence is provided to describe why the selected threshold is appropriate (CEQA Guidelines, §15064.7(d)).

In 2012, the San Luis Obispo County Air Pollution Control District (APCD) established an annual significance threshold of 1,150 metric tons of carbon dioxide equivalent (MTCOe/yr). This significance threshold is approximately equivalent to the operational GHG emissions associated with a 70-unit residential subdivision in an urban setting (49-unit rural development) or a 40,000 sq. ft. strip mall in an urban setting (San Luis Obispo County APCD 2012). Santa Barbara County selected the San Luis Obispo County APCD threshold of 1,150 $MTCO_2e$/yr as the most appropriate threshold to determine significance of cumulative impacts from GHG emissions for this proposed project. The rationale for applying the San Luis Obispo County APCD GHG emissions significance threshold is discussed below.

Threshold Applicability

- The threshold applies to GHG emissions that are not industrial stationary sources, but that are subject to discretionary approvals by the County, where the County is the CEQA lead agency.
- The threshold was developed to be consistent with Assembly Bill 32 (the California Global Warming Solutions Act of 2006), which established the State of California's 2020 GHG emissions reduction goal.
- The selected threshold considers GHG emissions comprehensively by measuring in annual metric tons of carbon dioxide equivalent.
- The threshold assessed historical and potential future land use development trends in San Luis Obispo County to establish the significance threshold. San Luis Obispo and Santa Barbara Counties have similar historical and potential future land use development trends.
- The threshold applies to GHG emissions from residential and commercial land use projects.
- The threshold assumes that construction emissions will be amortized over the life of a project and added to the operational emissions.
- The threshold does not apply to GHG that are emitted throughout the life cycle of products that a project may produce or consume.

Impact Discussion *(a, b)*: Greenhouse gas emissions associated with the Project would be limited to those emitted from construction equipment during grading and installation activities and from mobile sources associated with routine site inspections and monitoring activities during operation. Up to about 18 vehicle trips per year to the site are anticipated during operation of the Project. These trips are expected to be primarily local (within 100 miles of the site) because the Owner/Operator would contract with a regional firm for site inspections.

The greenhouse gas emissions for a battery storage project located in Goleta[5] with similar mobile sources during operations were calculated to be on the order of 2 $MTCO_2e$/yr. This is well below the San Luis Obispo County APCD threshold of 1,150 MTCO2e/yr. In addition, use of the proposed BESS during a power outage could displace some local use of diesel or natural gas-fueled generators, reducing GHG emissions during the outage. The California Air Resources Board notes that emergency backup power

[5] City of Goleta, NRG Ellwood Battery Storage Project Mitigated Negative Declaration, Case #15-145-CUP, Table 8. https://www.cityofgoleta.org/home/showdocument?id=14059

from batteries supplied by solar energy has zero air pollutant emission exposure.[6] To the extent the electricity supplied to the BESS from the grid is produced from renewable sources (solar and wind), the power provided by the BESS back to the grid would reduce reliance on diesel or gas generators for backup power. The proposed Project would not result in significant greenhouse gas emissions, either directly or indirectly, as compared to the existing environmental setting. No adverse impacts related to greenhouse gas emissions are anticipated.

Cumulative Impacts: Since the Project would not generate significant greenhouse gas emissions, it would not have a cumulatively considerable effect on greenhouse gas emissions.

Mitigation and Residual Impact: No significant impacts are identified. Therefore, no mitigation is necessary.

4.4 BIOLOGICAL RESOURCES

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
Flora					
a. A loss or disturbance to a unique, rare or threatened plant community?				**X**	
b. A reduction in the numbers or restriction in the range of any unique, rare or threatened species of plants?				**X**	
c. A reduction in the extent, diversity, or quality of native vegetation (including brush removal for fire prevention and flood control improvements)?				**X**	
d. An impact on non-native vegetation whether naturalized or horticultural if of habitat value?				**X**	
e. The loss of healthy native specimen trees?				**X**	
f. Introduction of herbicides, pesticides, animal life, human habitation, non-native plants or other factors that would change or hamper the existing habitat?				**X**	
Fauna					
g. A reduction in the numbers, a restriction in the range, or an impact to the critical habitat of any unique, rare, threatened or endangered species of animals?				**X**	
h. A reduction in the diversity or numbers of animals onsite (including mammals, birds, reptiles, amphibians, fish or invertebrates)?				**X**	
i. A deterioration of existing fish or wildlife habitat (for foraging, breeding, roosting, nesting, etc.)?				**X**	
j. Introduction of barriers to movement of any resident or migratory fish or wildlife species?				**X**	
k. Introduction of any factors (light, fencing, noise, human presence and/or domestic animals) which could hinder the normal activities of wildlife?			**X**		

[6] https://ww2.arb.ca.gov/our-work/programs/public-safety-power-shutoff-psps-events/emergency-backup-power-options

Existing Plant and Animal Communities/Conditions: Santa Barbara County has a wide diversity of habitat types, including chaparral, oak woodlands, wetlands and beach dunes. These are complex ecosystems and many factors are involved in assessing the value of the resources and the significance of project impacts. For this project, a site visit was conducted on December 3, 2019. The existing biological conditions are described above in Section 3.1.

Environmental Thresholds: Santa Barbara County's Environmental Thresholds and Guidelines Manual (2018) includes guidelines for the assessment of biological resource impacts. The following threshold is applicable to this project:

> *Wetlands*: Projects which result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or would threaten the continuity of wetland-dependant animal or plant species are considered to have a potentially significant effect on the environment. Projects which substantially interrupt wildlife access, use and dispersal in wetland areas would typically be considered to have a potentially significant impact. Projects which disrupt the hydrology of wetlands systems would be considered to have a potentially significant impact.

Impact Discussion *(a through j)*: The biological report and preliminary jurisdiction wetlands report submitted as part of the Project application provide additional detail about the Project area and are included in Appendix 2. The following analysis is based on this information.

No natural plant communities, habitats, native or specimen trees are located in the area of Project disturbance. Some sensitive wildlife species may transit the site for migration or foraging. The site contains does not contain natural plant communities considered rare by the CDFW. The Preliminary Jurisdictional Wetlands report prepared for the Project notes that based on the presence of water, three types of jurisdictional features may occur within the study area:

> 0.3 acre of USACE/RWQCB non-wetland waters of the U.S.
> 0.34 acre of CDFW jurisdictional waters
> 0.26 acre of California Coastal Commission (CCC) wetlands

These features are two shallow agricultural ditches along the eastern and western boundaries of the Project parcel (USACE/RWQCB non-wetland waters of the U.S. and CDFW jurisdictional waters), and the concrete-lined Flood Control drainage channel along the parcel's southern boundary (CCC wetlands). All three features occur outside of the Project site, except that the new access driveway off of the private portion of Foothill Road would cross over the agricultural ditch along the eastern side of the parcel. The concrete pad for the battery storage units would be located at least 100 feet from the three potential jurisdictional features.

***(k)*:** An eight-foot wood fence would be constructed around the battery storage pad and existing hedges would remain along the western, southern, and eastern property boundaries. New night lighting, directed downward and with motion sensors, would be installed near the battery energy storage units on the new concrete pad, as approved by the County SBAR. Personnel would not be onsite except for maintenance and inspection. Given the low biological sensitivity of the Project site and transient use by wildlife, the introduction of night-lighting and additional fencing at the site would not be expected to hinder normal activities of wildlife at or near the Project site.

Based on the foregoing, no significant impacts to biological resources and/or jurisdictional features are anticipated. It is the applicant's responsibility to comply with any authorizations or permits that may be required from other federal and/or state agencies (e.g., CDFW, USACOE) with jurisdiction.

Mitigation and Residual Impact[7]: No significant impacts are identified. No mitigation is necessary.

Cumulative Impacts: Since the Project would not significantly impact biological resources on or near the site, it would not have a cumulatively considerable effect on biological resources within the County.

[7] May require payment of fees to the CDFW.

4.5 CULTURAL RESOURCES

Will the proposal:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Cause a substantial adverse change in the significance of any object, building, structure, area, place, record, or manuscript that qualifies as a historical resource as defined in CEQA Section 15064.5?				**X**	
b. Cause a substantial adverse change in the significance of a prehistoric or historic archaeological resource pursuant to CEQA Section 15064.5?		**X**			
c. Disturb any human remains, including those located outside of formal cemeteries?				**X**	
d. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resources Code Section 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: 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 the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				**X**	

Existing Setting: For at least the past 10,000 years, the area that is now Santa Barbara County has been inhabited by Chumash Indians and their ancestors. Based on a Cultural Resources Inventory and Extended Phase I Investigation conducted on the Project site for the applicant by Stantec (2019), review of previous studies conducted in the vicinity, and a records search at the CCIC (Central Coast Information Center of the University of California, Santa Barbara), significant cultural resources are not located in the vicinity of the proposed Project. Stantec also requested a search from the Native American Heritage Commission (NAHC) of the sacred lands file and a list of Native American individuals/tribes that may have information on sacred or special sites in the vicinity of the Project parcel. The sacred lands search did not identify any known resources that are sensitive to or of concern to the Native American community. Stantec contacted the Native American tribes and individuals on the contact list provided by the NAHC: the Santa Ynez Band of Chumash Indians and the Santa Ynez Tribal Elders Council. No comments were received from these contacts. Pursuant to CEQA Section 21080.3.1, a formal AB 52 notification of the complete Project application from the County Planning & Development Dept. was delivered to Ms. Julie Tumamait-Stenslie, Chair of the Barbareño/Ventureño Band of Mission Indians on September 5, 2019. No request for consultation or other response was received as of December 2, 2019.

Environmental Thresholds: Chapter 8 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (March 2018) contains guidelines for the identification, significance evaluation, and

mitigation of impacts to cultural resources, including archaeological, historic, and tribal cultural resources. In accordance with the requirements of CEQA, these guidelines specify that if a resource cannot be avoided, it must be evaluated for importance under specific CEQA criteria. CEQA Guidelines Section 15064.5(a)(3)A-D contains criteria for evaluating the importance of archaeological and historic resources. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets these significance criteria for listing in the California Register of Historical Resources: (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (B) Is associated with the lives of persons important in our past; (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (D) Has yielded, or may be likely to yield, information important in prehistory or history. The resource also must possess integrity of at least some of the following: location, design, setting, materials, workmanship, feeling, and association. For archaeological resources, the criterion usually applied is (D). CEQA Guidelines Section 15064.5(b) states that "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." As defined in CEQA Guidelines Section 15064.5(b), substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Impact Discussion: ***(a, b, c, d)*** As discussed above, no cultural or historic resources were identified within or adjacent to the Project area. As a result, the proposed Project would not cause a substantial adverse change in the significance of any historical resource, cause a substantial adverse change in the significance of a prehistoric or historic archaeological resource, disturb any human remains, or cause a substantial adverse change in the significance of a tribal cultural resource. In order to comply with county cultural resource protection policies, the Project would be conditioned with a standard archaeological discovery clause (MM CULT-1, below) which requires that any previously unidentified cultural resources discovered during site development are treated in accordance with the County's Cultural Resources Guidelines [Chapter 8 of the County's Environmental Thresholds and Guidelines Manual (2018)]. Impacts would be less than significant.

Cumulative Impacts: Since the Project would not significantly impact cultural resources, it would not have a cumulatively considerable effect on the County's cultural resources with implementation of the mitigation measure described below.

Mitigation and Residual Impact: Impacts to cultural resources would be less than significant with implementation of mitigation measure CULT-1. This measure would also ensure the Project's compliance with County cultural resource policies.

MM CULT-1. **Stop Work at Encounter.** The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological or cultural remains are encountered during grading, construction, landscaping or other construction-related activity. The Owner/Applicant shall immediately contact P&D staff, and retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of the County Archaeological Guidelines and conduct appropriate mitigation funded by the Owner/Applicant. **PLAN REQUIREMENTS:** This condition shall be printed on all building and grading plans. **MONITORING:** P&D staff shall check plans prior to approval of the Coastal Development Permit and P&D compliance monitoring staff shall spot check in the field throughout grading and construction.

4.6 ENERGY

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Substantial increase in demand, especially during peak periods, upon existing sources of energy?				**X**	
b. Requirement for the development or extension of new sources of energy?				**X**	

Impact Discussion: The Project would store electricity for distribution back to the grid when needed. During construction and operation, the Project would require minimal amounts of electricity from the grid and would not create a substantial increase in demand or extensions of services of new sources of energy. In summary, the Project would have minimal long-term energy requirements. No adverse impacts would result.

Cumulative Impacts: The Project's contribution to the regionally significant demand for energy would not be considerable, and is therefore less than significant.

Mitigation and Residual Impact:

No mitigation is required. Residual impacts would be less than significant.

4.7 FIRE PROTECTION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Introduction of development into an existing high fire hazard area?			**X**		
b. Project-caused high fire hazard?			**X**		
c. Introduction of development into an area without adequate water pressure, fire hydrants or adequate access for fire-fighting?				**X**	
d. Introduction of development that will hamper fire prevention techniques such as controlled burns or backfiring in high fire hazard areas?				**X**	
e. Development of structures beyond safe Fire Dept. response time?				**X**	

Existing Setting: The Project site is located within the Carpinteria-Summerland Fire Protection District at the southern boundary of the wildland-urban interface in the Carpinteria area, in a high fire hazard area.

Impact Discussion *(a through e)*: Predictions about the long-term effects of global climate change in California include increased incidence of wildfires and a longer fire season, due to drier conditions and warmer temperatures. Any increase in the number or severity of wildfires has the potential to impact resources to fight fires when they occur, particularly when the state experiences several wildfires simultaneously. Such circumstances place greater risk on development in high fire hazard areas. The project has been designed to meet applicable Carpinteria-Summerland Fire District standards for access and fire hydrants. The Project would not significantly increase fire hazards under normal operating conditions.

Please refer to Section 4.9, below for an assessment of risks associated with the Project that could result from fire-related impacts. In summary, adverse impacts could occur if the BESS facility experienced elevated temperatures from a system malfunction or external fire event that could result in impacts. The

probability of such events occurring is low, and the project safety features and mitigation measures identified in the Project description and Section 4.9 would ensure that the impacts would not extend offsite.

Cumulative Impacts: Since the Project would not create significant fire hazards, it would not have a cumulatively considerable effect on fire safety within the County.

Mitigation and Residual Impact: No mitigation is required. Residual impacts would be less than significant.

4.8 GEOLOGIC PROCESSES

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Exposure to or production of unstable earth conditions such as landslides, earthquakes, liquefaction, soil creep, mudslides, ground failure (including expansive, compressible, collapsible soils), or similar hazards?		**X**			
b. Disruption, displacement, compaction or overcovering of the soil by cuts, fills or extensive grading?				**X**	
c. Exposure to or production of permanent changes in topography, such as bluff retreat or sea level rise?				**X**	
d. The destruction, covering or modification of any unique geologic, paleontologic or physical features?				**X**	
e. Any increase in wind or water erosion of soils, either on or off the site?				**X**	
f. Changes in deposition or erosion of beach sands or dunes, or changes in siltation, deposition or erosion which may modify the channel of a river, or stream, or the bed of the ocean, or any bay, inlet or lake?				**X**	
g. The placement of septic disposal systems in impermeable soils with severe constraints to disposal of liquid effluent?				**X**	
h. Extraction of mineral or ore?				**X**	
i. Excessive grading on slopes of over 20%?				**X**	
j. Sand or gravel removal or loss of topsoil?				**X**	
k. Vibrations, from short-term construction or long-term operation, which may affect adjoining areas?				**X**	
l. Excessive spoils, tailings or over-burden?				**X**	

Impact Discussion *(a through l)*: The proposed Project site does not have substantial geological hazards, constraints or slopes exceeding 20%. The Project site is not underlain by any known active or potentially active fault. The proposed Project would not result in excessive grading, mineral ore extraction, loss of topsoil, or excessive overburden. Although the soil type at the Project site is Camarillo fine sandy loam soil with a high potential for liquefaction, implementation of mitigation measure GEO-1 would ensure that the proposed Project would not result in impacts related to geological resources. A site-specific soils report prepared for the applicant concluded that the site is suitable for development of the proposed Project from a geotechnical engineering standpoint with implementation of several recommendations addressing compressibility of near-surface spoils, potential for settlement related to liquefaction, and potential for lateral spreading.

Cumulative Impacts: Since the Project would not result in significant geologic impacts, it would not have a cumulatively considerable effect on geologic hazards within the County.

Mitigation and Residual Impact: Implementation of the measure would reduce the Project's potential geologic impacts. With incorporation of this measure, residual impacts would be less than significant.

MM GEO-1 **Soils Engineering Report**. The Owner/Applicant shall implement the recommendations identified in the Earth Systems Pacific geotechnical engineering report dated April 29, 2019 prepared for the Project, including structural design criteria and measures specifically addressing the potential for liquefaction. **PLAN REQUIREMENTS**: The Owner/Applicant shall demonstrate that the submitted plans conform to required report components. Recommendations from the report shall be reflected on grading and building plans as required. **TIMING:** The Owner/Applicant shall submit the report to P&D for review prior to issuance of the Coastal Development Permit. **MONITORING**: P&D permit processing planner will review the report. Grading and building inspectors will ensure compliance in the field.

4.9 HAZARDOUS MATERIALS/RISK OF UPSET

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. In the known history of this property, have there been any past uses, storage or discharge of hazardous materials (e.g., fuel or oil stored in underground tanks, pesticides, solvents or other chemicals)?			**X**		
b. The use, storage or distribution of hazardous or toxic materials?			**X**		
c. A risk of an explosion or the release of hazardous substances (e.g., oil, gas, biocides, bacteria, pesticides, chemicals or radiation) in the event of an accident or upset conditions?		**X**			
d. Possible interference with an emergency response plan or an emergency evacuation plan?		**X**			
e. The creation of a potential public health hazard?		**X**			
f. Public safety hazards (e.g., due to development near chemical or industrial activity, producing oil wells, toxic disposal sites, etc.)?				**X**	
g. Exposure to hazards from oil or gas pipelines or oil well facilities?				**X**	
h. The contamination of a public water supply?				**X**	

Existing Setting: The Project parcel has been used for agricultural purposes for many years and pesticides may have been used in the past. The Project site itself is not currently in production and has been leveled with imported soil in the past.

A number of codes and standards are relevant to the proposed battery storage system. These include the following (see Appendix 4, Hazard Assessment Report, for more detail):

UL9540A (Underwriters Laboratory). Evaluation of fire characteristics of a BESS that undergoes thermal runaway.

UL1973 Evaluations of battery systems' ability to withstand simulated abuse situations; requires energy storage system not be an explosion hazard and that a single cell failure will not result in cascading thermal runaway of cells.

IEEE C2 (Institute of Electronic Engineers). Basic provisions for safeguarding people from hazards during installation, operation or maintenance of electrical supply stations and electrical supply and communication lines.

NFPA 550 (National Fire Protection Association). Addresses battery management systems and compatible equipment, ventilation, fire-resistive separation and array spacing, and signage.

NFPA 855 Criteria for minimizing hazards associated with energy storage systems (draft version published).

CA Fire 608 California Fire Code 608 addresses limits on battery system sizes, seismic and structural design, spacing, vehicle impact protection, testing, maintenance and repairs, battery management systems, shutdown and notification requirements, smoke detection, fire suppression and ventilation for stationary storage battery systems.

OEHHA Existing regulations relevant to the proposed Project includes the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (Health and Safety Code §44344.4(c)) implemented by the state's Office of Environmental Health Hazard Assessment (OEHHA). This requires the assessment of potential acute, chronic, and cancer health risks associated with facilities.

CPUC The California Public Utilities Commission developed a set of guidelines for documentation and safe practices at energy storage systems co-located at electric utility substations, power plants or other facilities. These guidelines require a safety plan and inspection procedures.

Safety Thresholds: The County's public safety threshold addresses involuntary public exposure from projects involving significant quantities of hazardous materials from operation of hazardous facilities or transportation of hazardous materials. The threshold addresses the likelihood and severity of potential accidents to determine whether the safety risks of a project exceed significant levels. A quantitative risk assessment is required for certain types of projects to make this determination.

The County has not established an environmental threshold for electromagnetic field (EMF) emissions. The Environmental Thresholds and Guidelines Manual directs that the potential for exposure to extremely low frequency (ELF) EMF emissions, such as those from electrical transmission and distribution lines, household wiring and appliances, and communications devices, be addressed on a case-by-case basis. The Guidelines also note that EMF emissions do not propagate over long distances from the source.

Impact Discussion *(a, b, f, g, h)*: Other than the batteries within the modules, no common household materials (cleaners, garden and automotive products, etc.) or other hazardous materials would be used or stored onsite. Normal operations would not result in leaks or spills of hazardous materials or waste disposal impacts. Project-related traffic would be minimal and would not interfere with emergency response capabilities to the Project site or to other properties in the Project area. The Project site would not be exposed to hazards from other chemical or industrial activity, producing oil wells, oil or gas pipelines, toxic disposal sites, or other similar hazardous facility. There is no potential for the proposed BESS to contaminate a public water supply.

***(c, d, e)*:** A quantitative risk assessment is not required for the Project. The Project would not use or store regulated substances or materials that could vaporize or evaporate quickly upon release and cause risk to the public. However, a number of toxic or flammable substances could be emitted if the batteries were to experience a malfunction. These substances include hydrogen chlorine, hydrogen fluoride, phosphine, and sulfur dioxide. A Hazards Assessment was prepared by the County's consultant to analyze the potential for public safety impacts in the event of an accident or upset condition (see Appendix 4). This Assessment identified a control system failure or a puncture of a battery module as reasonable worst-case events that could occur for the Project. The Project includes several design features and control systems to avoid the occurrence of such events or to limit the scope of impacts if they do occur. For example, a Battery Management System incorporated into the cabinets would monitor cell voltages, currents and temperatures and would have the capability to shut down equipment if unsafe conditions are detected. In addition, the

applicant has agreed to install fire and gas emission detectors at the site as required in mitigation measure HAZ-1 below. All safety systems would be monitored full time at a remote location via a Supervisory Control and Data Acquisition (SCADA) system. Alerts would trigger implementation of response protocols identified in the Project Safety Plan, including notification of the Carpinteria-Summerland Fire District as needed.

To evaluate the risks and impacts of a reasonable worst-case event, the Hazard Assessment assumes the built-in, automatic controls fail and uses both a screening and modeling approach to estimate the impacts of off-gassing of flammable and toxic emissions that could result from battery malfunction or damage. Both events are considered unlikely to occur.

Toxic emissions: The Hazard Assessment found that, if off-gassing were to occur, the toxic material plume would rise rapidly because of the elevated temperature of the materials. Because the plume would be elevated (at about 15 feet above ground), higher concentrations of toxic materials would not be realized near ground-level where there is potential to affect people. The maximum offsite concentration of toxic material would remain below levels of concern at receptor heights. The closest receptor to the proposed battery cabinets is the church located at the corner of Foothill Road and Linden Avenue. The church's play structure and buildings would be outside the impact distance of a toxic material plume. Therefore, the public health impacts from toxic pollutants associated with the reasonable worst-case battery cell malfunction would not be significant.

Flammable Vapor Cloud: Off-gassed material could create a flammable vapor cloud. The Hazard Assessment modeling found that if the vapor cloud ignited (vapor cloud explosion), impacts would occur within 15 feet of the battery cabinets and would not reach potential off-site receptors, such as the church. Thermal impacts of a fire and thermal radiation levels would not extend beyond the Project site and thus would not result in significant public safety impacts or health hazards.

EMF emissions. Two components of the proposed Project have the potential to emit electromagnetic frequency (EMF) emissions, the batteries within the containers on the pad and the power line connecting the Megapacks to the SCE grid. The components must have nationally accredited certifications for electromagnetic compatibility (EMC), among other safety-related standards. EMC testing relevant to the system proposed to be installed certifies that the battery storage equipment would not produce any significant electromagnetic fields (EMF) that could disturb other electrical systems or within the modules themselves. The Project would be connected to the SCE grid at medium voltage (16 kV), the same voltage as SCE's distribution system throughout Carpinteria and Santa Barbara County, including the multiple 16 kV and 66 kV SCE circuits along the north side of Foothill Road. EMF from the Project would occur in the relatively short 16kV connecting line that would be located north of the existing SCE 16 kV lines on the eastern edge of the site for a short distance before its connection to the underground lines from the Megapacks. The Project's connecting power line would not include higher voltage circuits (more than 35 kV) than currently exist in the Project vicinity. The low-level EMF emissions associated with the overhead connecting line to SCE would be less than EMF emissions from the existing SCE lines and would not reach potential receptors beyond the Project site.

Given the low levels of EMF from the battery storage system's electronic components and the absence of new incremental EMF to the existing offsite electrical grid, no impacts from EMF would occur.

Cumulative Impacts: Since the Project would not create significant impacts with respect to hazardous materials and/or risk of upset, it would not have a cumulatively considerable effect on public safety.

Mitigation and Residual Impact: Along with built-in Project safety features, implementation of the following mitigation measures would ensure that the Project's effects regarding hazardous materials and/or risk of upset would be less than significant. With the incorporation of these measures, residual impacts would be less than significant.

MM HAZ-1 **Risk Reduction Measures.** The following measures shall be implemented to reduce risks related to siting and installation of the proposed battery modules:

1. All batteries shall be discharged to below 30% state of charge (SOC) during the construction and installation phases.
2. Any replacement or maintenance of batteries requiring the use of heavy construction equipment, such as cranes or forklifts, shall be conducted only on batteries discharged to below 30% SOC and nearby batteries that could be affected shall also be discharged to below 30% SOC while maintenance/replacement activities are occurring.
3. Vehicle impact bollards (or equivalent) shall be installed to reduce the potential for vehicle impacts to the battery cabinets (as per NFPA 855 section 4.3.7).
4. Monitoring equipment shall be installed and operated at the BESS facility to detect fires and off gassed materials. The monitors shall alarm to a central, staffed location and initiate an audible and visual signal. Detection equipment shall be placed between the battery cabinets and the closest sensitive receptor (First Baptist Church of Carpinteria) and shall include the use of a fire/flame detector (Det-Tronics x3302 or equivalent) and a gas detector (Det-Tronics CGS or equivalent).

PLAN REQUIREMENTS and TIMING: Locations of bollards and detection equipment shall be noted on all grading and building plans. Prior to issuance of the Coastal Development Permit, the Owner/Applicant shall submit to P&D: (1) a description of the monitors required herein (type, operating parameters) to be installed; (2) provisions for notification to the Carpinteria-Summerland Fire District when specific alarms that may require local response are registered at the central facility; and (3) an outline for a monthly summary report to P&D of alarms, incidents, and maintenance activities throughout operations. The monthly reporting frequency may be reduced at the County's discretion if less frequent reporting is warranted, based on the facility's safety record. **MONITORING**: P&D staff will ensure measures are on grading and building plans and P&D inspectors will ensure compliance onsite. P&D permit compliance staff will review the summary reports during operations.

MM HAZ-2 **Site Safety Plan.** The Owner/Applicant shall prepare a Site Safety Plan that includes, but is not limited to, identification of:

- Fire prevention, detection, and suppression features;
- emergency response procedures, including notification of local responders;
- personnel safety training;
- fire suppression and other safety features/equipment located at the site;
- type and placement of warning signs;
- emergency ingress and egress routes;
- special safety measures to be implemented for battery installation and replacement, including disposal of replaced (discarded) equipment; and
- provisions and timing for updating the Plan to incorporate new or changed requirements.

PLAN REQUIREMENTS AND TIMING: The Plan shall be submitted to P&D and Carpinteria-Summerland Fire District for review and approval prior to issuance of the Coastal Development Permit. Updates to the Plan shall be submitted to P&D and Carpinteria-Summerland Fire District as they are completed. **MONITORING**: P&D will verify implementation of the approved Safety Plan, including updates to it, through records review and site inspections as needed during operations.

4.10 LAND USE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Structures and/or land use incompatible with existing land use?				**X**	
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				**X**	
c. The induction of substantial growth or concentration of population?				**X**	
d. The extension of sewer trunk lines or access roads with capacity to serve new development beyond this proposed project?				**X**	
e. Loss of existing affordable dwellings through demolition, conversion or removal?				**X**	
f. Displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				**X**	
g. Displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere?				**X**	
h. The loss of a substantial amount of open space?				**X**	
i. An economic or social effect that would result in a physical change? (i.e. Closure of a freeway ramp results in isolation of an area, businesses located in the vicinity close, neighborhood degenerates, and buildings deteriorate. Or, if construction of new freeway divides an existing community, the construction would be the physical change, but the economic/social effect on the community would be the basis for determining that the physical change would be significant.)				**X**	
j. Conflicts with adopted airport safety zones?				**X**	

Existing Setting: The Project site is located within the Carpinteria Valley planning area. The Valley is a long, narrow coastal plain paralleling the shoreline and the Santa Ynez Mountains and is an important agricultural resource in the County. The Project site is situated within the South Coast Rural Region at the urban-rural boundary, just north of Foothill Road. The South Coast Conduit runs along Foothill Road south of the site. The primary land use to the south is residential, within the City of Carpinteria, and agriculture in the unincorporated area dominates to the north and east. A mix of agricultural and urban land uses occur to the west, including Carpinteria High School to the northwest. The Project parcel is zoned AG-1-10 and designated Agriculture I.

Impact Discussion *(a through j)*: The proposed Project would not cause a physical change that would conflict with adopted environmental policies or regulations. The Project is not growth inducing, and would not result in the loss of affordable housing, loss of open space, or displacement of people. The Project would

not involve the extension of a sewer trunk line, and would not conflict with any airport safety zones and none of the Project components would cross the South Coast Conduit easement. The Project is compatible with existing land uses in the vicinity, including existing agricultural activities on the parcel. Project development would require a total of about one acre, leaving at least 12 acres of the parcel available for agricultural operations.

Mitigation and Residual Impact: No impacts are identified. No mitigation is necessary.

4.11 NOISE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Long-term exposure of people to noise levels exceeding County thresholds (e.g. locating noise sensitive uses next to an airport)?			**X**		
b. Short-term exposure of people to noise levels exceeding County thresholds?		**X**			
c. Project-generated substantial increase in the ambient noise levels for adjoining areas (either day or night)?			**X**		

Existing Setting: The Project site is surrounded by agricultural activity. Common agricultural operation noise and traffic noise along Foothill Road can be heard at the site. The First Baptist Church of Carpinteria is the only sensitive receptor located within 1,600 feet of the Project site.

Noise Thresholds: The County's basic noise threshold is 65 dBA at a property line. Based on an average construction noise level of 95 dBA, sensitive receptors within 1,600 feet of the construction site could be affected by levels over 65 dBA. Where grading and construction noise would result in levels in excess of 65 dBA at a sensitive receptor, noise-generating activities are limited to weekdays between the hours of 8 AM to 5 PM.

Impact Discussion *(a, c)*: Primary operational noise sources for the project would be the Megapacks (battery cabinets). According to the Megapack specification sheet, the audible noise measured at 1 meter (3.28 feet) from the cabinet enclosure would be less than 75 dBA at full performance. The nearest receptor to the Project (church to the southwest at Foothill Road/Hwy 192 and Linden Ave.) would be located more than 100 feet from the Megapacks. Sound generated from a stationary source typically diminishes at a rate of 7.5 dBA for each doubling of distance over acoustically "soft" sites, such as the dirt field between the Project and the nearest receptor. Noise from the Megapacks would dissipate to less than the County's threshold within about 10-13 feet from the Project site and thus would not exceed the threshold at the property line. Therefore, routine noise levels emanating from the BESS system would be low and would not result in: a) the generation of any noise exceeding County thresholds; b) substantially increased ambient noise levels in adjoining areas; or c) exposure of noise sensitive uses on the Project site to off-site noise levels exceeding County thresholds. No noise-related impacts would result.

(b) Construction levels would likely exceed the 65dBA threshold when large equipment is operating onsite, for example, during concrete work and to place the Megapacks on the pad. Mitigation measure NOISE-1 below is required to mitigate this short-term impact.

Cumulative Impacts: Implementation of the Project is not anticipated to result in any substantial noise impacts. Therefore, the Project's contribution to cumulative noise impact would not be considerable.

Mitigation and Residual Impact: The following mitigation measure is required to limit potential exposure to sensitive receptors of noise levels exceeding the basic County threshold of 65 dBA during construction. Residual impacts would be less than significant.

MM NOISE-1 Construction Hours. The Owner /Applicant, including all contractors and subcontractors shall limit construction activity, including equipment maintenance and site preparation, to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday. No

construction shall occur on weekends or State holidays. Non-noise generating construction activities such as plumbing, electrical, drywall and painting (which does not include the use of compressors, tile saws, or other noise-generating equipment) are not subject to these restrictions. **PLAN REQUIREMENTS:** The Owner/Applicant shall provide and post a sign stating these restrictions at all construction site entries. **TIMING**: Signs shall be posted prior to commencement of construction and maintained throughout construction. **MONITORING**: The Owner/Applicant shall demonstrate that required signs are posted prior to grading/building permit issuance and pre-construction meeting. Building inspectors and permit compliance staff shall spot check and respond to complaints.

4.12 PUBLIC FACILITIES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. A need for new or altered police protection and/or health care services?				**X**	
b. Student generation exceeding school capacity?				**X**	
c. Significant amounts of solid waste or breach any national, state, or local standards or thresholds relating to solid waste disposal and generation (including recycling facilities and existing landfill capacity)?				**X**	
d. A need for new or altered sewer system facilities (sewer lines, lift-stations, etc.)?				**X**	
e. The construction of new storm water drainage or water quality control facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				**X**	

Impact Discussion *(a through e)*: The proposed Project would not result in an increase of new homes or other uses within the area that would have a significant impact on existing police protection or health care services. Existing service levels would be sufficient to serve the proposed Project. The proposed Project would not generate solid waste in excess of County thresholds and would not require extension of sewer services. The proposed Project would create new impervious surfaces that could result in greater surface runoff from the site since there would be less open ground capable of absorbing rainwater. This increased surface runoff would be accommodated within the site in a new 8,000 sq. ft. retention basin. No additional drainages or water quality control facilities would be necessary to serve the Project. Therefore, the Project would have no impact to public facilities.

Mitigation and Residual Impact: No impacts are identified. No mitigation is necessary.

Cumulative Impacts: Implementation of the Project would not result in adverse effects on public facilities and thus would not contribute in a cumulatively considerable manner to such impacts.

4.13 RECREATION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Conflict with established recreational uses of the area?				**X**	
b. Conflict with biking, equestrian and hiking trails?				**X**	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
c. Substantial impact on the quality or quantity of existing recreational opportunities (e.g., overuse of an area with constraints on numbers of people, vehicles, animals, etc. which might safely use the area)?				**X**	

Impact Discussion *(a, b, c)*: The proposed Project site is not located on or near any established recreational uses, including biking, equestrian or hiking trails. The proposed Project would not result in any population increase and would have no adverse impacts on the quality or quantity of existing recreational opportunities, either in the Project vicinity or County-wide. No adverse impacts to recreational uses would result from the Project.

Mitigation and Residual Impact: No mitigation is required and no residual impacts would occur.

Cumulative Impacts: Implementation of the Project would not result in impacts to recreational uses and so would not contribute in a cumulatively considerable manner to such impacts.

4.14 TRANSPORTATION/CIRCULATION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Generation of substantial additional vehicular movement (daily, peak-hour, etc.) in relation to existing traffic load and capacity of the street system?				**X**	
b. A need for private or public road maintenance, or need for new road(s)?				**X**	
c. Effects on existing parking facilities, or demand for new parking?				**X**	
d. Substantial impact upon existing transit systems (e.g. bus service) or alteration of present patterns of circulation or movement of people and/or goods?				**X**	
e. Alteration to waterborne, rail or air traffic?				**X**	
f. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians (including short-term construction and long-term operational)?				**X**	
g. Inadequate sight distance?				**X**	
ingress/egress?				**X**	
general road capacity?				**X**	
emergency access?				**X**	
h. Impacts to Congestion Management Plan system?				**X**	

Impact Discussion *(a through h)*: The proposed Project is limited to operation of a normally unstaffed battery energy storage facility and, as such, would not increase vehicular traffic to or from the site nor would it affect roadways; parking facilities; pedestrian, bicycle, or transit access; or any other type of transportation facility. Minimal vehicle trips (up to about 18 per year) would be generated a few times per year for maintenance, which could include battery replacements requiring short-term operation of heavy equipment on the site. The Project's effect on transportation modes and circulation would therefore be less than significant.

Mitigation and Residual Impact: No mitigation is required. Residual impacts would not be significant.

Cumulative Impacts: Implementation of the Project would not result in long-term effects on transportation infrastructure or circulation and thus would not contribute in a cumulatively considerable manner to such impacts.

4.15 WATER RESOURCES/FLOODING

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters?				**X**	
b. Changes in percolation rates, drainage patterns or the rate and amount of surface water runoff?		**X**			
c. Change in the amount of surface water in any water body?				**X**	
d. Discharge, directly or through a storm drain system, into surface waters (including but not limited to wetlands, riparian areas, ponds, springs, creeks, streams, rivers, lakes, estuaries, tidal areas, bays, ocean, etc) or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, or thermal water pollution?				**X**	
e. Alterations to the course or flow of flood water or need for private or public flood control projects?				**X**	
f. Exposure of people or property to water related hazards such as flooding (placement of project in 100-year flood plain), accelerated runoff or tsunamis, sea level rise, or seawater intrusion?				**X**	
g. Alteration of the direction or rate of flow of groundwater?				**X**	
h. Change in the quantity of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or recharge interference?				**X**	
i. Overdraft or over-commitment of any groundwater basin? Or, a significant increase in the existing overdraft or over-commitment of any groundwater basin?				**X**	
j. The substantial degradation of groundwater quality including saltwater intrusion?				**X**	
k. Substantial reduction in the amount of water otherwise available for public water supplies?				**X**	
l. Introduction of storm water pollutants (e.g., oil, grease, pesticides, nutrients, sediments, pathogens, etc.) into groundwater or surface water?				**X**	

Impact Discussion *(a, c through l)*: During construction the Project would require an estimated 20 to 40 truckloads of water from offsite sources primarily for dust suppression and concrete work. The amount of water delivered per truck trip could range from 500 gallons to 4,000 gallons. Water is not required for Project operations. The Project would not result in impacts on the direction or course of surface or groundwater. The Project site is not located within a floodway or designated flood hazard area and is located within the

County's Flood Recovery High Hazard Area. The Flood Recovery maps were developed after winter storms following the December 2017 Thomas Fire and ensuing mud and debris flows changed ground conditions in parts of eastern Santa Barbara County. The maps are intended to inform rebuilding decisions and create awareness of risk where ground conditions may have changed.[8]

(b) Runoff from the Project site would be controlled through use of earthen swale(s) and an 8,000 sq. ft. bioretention area to filter stormwater and reduce peak flows. The Project would result in an additional 25,616 square feet of impervious surface area on the parcel, including the new compacted gravel driveway and concrete slab for the battery storage area. The site has been designed so that stormwater would run off of impervious surfaces (concrete slab, driveway) into earthen swales that would in turn run into the bioretention area. The applicant has submitted a preliminary Stormwater Control Plan prepared pursuant to the County's Post-Construction Stormwater Requirements for treating storm water quality to the County Public Works Dept. Water Resources Division. The Water Resources Division would review and approve the final Stormwater Control Plan before construction could begin.

Cumulative Impacts: The Project would not result in impacts to surface or groundwater resources, or contribute to regional cumulative impacts to water supplies and water quality.

Mitigation and Residual Impact: With the incorporation of this measure, impacts to water resources and flooding would not be significant and no residual impacts would occur.

MM WATER-1 **Stormwater Control Plan.** Stormwater control measures shall be implemented as part of the Project. A final Stormwater Control Plan (Plan) shall be submitted to the County Public Works Dept., Water Resources Division (Project Clean Water) and shall describe the site design and runoff control measures that will ensure compliance with the County's Post-Construction Stormwater Requirements and Standard Conditions for Project Plan Approval – Water Quality BMPs, as described in the Water Resources Division letter dated April 1, 2019. **PLAN REQUIREMENTS**: The Stormwater Control Plan shall include, but is not limited to the following components:

a. Relevant details on the location and function of treatment facilities, including a separate plan sheet showing locations of impervious surfaces and their delineated drainage management area;

b. Demonstration of how the treatment area(s) comply with the standard conditions by managing runoff from the design storm;

c. Long-term maintenance plan appropriate for the proposed facilities.

TIMING: The final Stormwater Control Plan shall be reviewed and approved by Public Works Project Clean Water and P&D prior to issuance of the Coastal Development Permit. The required components of the Plan and BMPs shall be described in detail on the grading and drainage plans and locations depicted graphically. **MONITORING**: P&D compliance monitoring staff shall site inspect for installation prior to issuance of final Building Inspection Clearance. The Owner/Applicant shall submit annual maintenance records to P&D for review upon request.

5.0 INFORMATION SOURCES

5.1 County Departments Consulted

County Fire, Public Works (Project Clean Water and Flood Control), Parks, Environmental Health;

[8] http://countyofsb.org/pwd/development.sbc (see Montecito Recovery Mapping - Interactive Map).

Other: Carpinteria-Summerland Fire District.

5.2 Comprehensive Plan

X	Seismic Safety/Safety Element		Conservation Element
	Open Space Element	X	Noise Element
X	Coastal Plan and Maps		Circulation Element
	ERME		Other

5.3 Other Sources

X	Field work	X	Ag Preserve maps
	Calculations	X	Flood Control maps
X	Project plans	X	Biological resources reports, surveys
	Traffic studies	X	Archaeological maps and reports
X	Parcel Records	X	Planning files, maps, reports
X	Grading plans	X	Zoning maps
X	Elevation, architectural renderings	X	Soils maps/reports
X	Topographical maps	X	Other: City of Goleta MND for NRG Ellwood Battery Energy Storage Project City Case No. 15-145-CUP
X	Published geological map/reports		

6.0 PROJECT SPECIFIC *(short- and long-term)* AND CUMULATIVE IMPACT SUMMARY

The proposed Project would not result in any short- or long-term adverse impacts that cannot be mitigated to less than significant levels with implementation of project design features and mitigation measures identified herein. The Project's contribution to adverse impacts would not be cumulatively considerable. As part of a growing network of electrical energy storage throughout the State, the Project would contribute to improved electrical grid reliability and reduction of greenhouse gas emissions.

7.0 MANDATORY FINDINGS OF SIGNIFICANCE

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
1. Does the project 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, contribute significantly to greenhouse gas emissions or significantly increase energy consumption, or eliminate important examples of the major periods of California history or prehistory?			**X**		
2. Does the project have the potential to achieve short-term to the disadvantage of long-term environmental goals?				**X**	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
3. Does the project 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.)				**X**	
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		**X**			
5. Is there disagreement supported by facts, reasonable assumptions predicated upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR?				**X**	

1. The project does not have the potential to substantially affect individuals or populations of sensitive plant and wildlife species, contribute to greenhouse gas emissions, increase energy consumption, or affect important archaeological, cultural, or historic resources.

2. The Project would contribute to long-term goals of improved energy supply resiliency and reduced greenhouse gas emissions.

3. The Project would not result in adverse cumulative impacts. This Initial Study determines that the potential environmental impacts of the Project would not be significant or would be less than significant with mitigation. In connection with the effects of past projects, exiting projects and foreseeable future projects, Project-related impacts would not be cumulatively considerable.

4. Impacts to human beings are associated with air quality, hazards, and noise. Air quality and noise impacts would not be significant for the proposed Project and impacts related to health and safety would be less than significant with implementation of mitigation measures and Project design safety features.

5. There is no known supportable disagreement or expert opinion that would warrant preparation of an EIR.

9.0 INITIAL REVIEW OF PROJECT CONSISTENCY WITH APPLICABLE SUBDIVISION, ZONING AND COMPREHENSIVE PLAN REQUIREMENTS

CEQA requires that proposed projects be analyzed to determine potential conflicts with adopted environmental plans and goals of the community where it is located (CEQA Guidelines §15125(b)). The following is a preliminary list of Coastal Land Use Plan and Coastal Act policies that would apply to the Project. A detailed analysis of the Project's consistency with applicable County policies and zoning requirements will be provided to the public and the decisionmakers prior to consideration of the Project at a public hearing.

Coastal Land Use Plan: Policy 2-6, Policy 3-8, Policy 3-11, Policy 3-12, Policy 3-13, Policy 3-14, Policy 3-16, Policy 3-17, Policy 3-18, Policy 3-19, Policy 4-2, Policy 4-3, Policy 8-2, Policy 8-3, Policy 8-4, Policy 9-36. California Coastal Act Policies: 30241, 30242, and 30243.

10.0 RECOMMENDATION BY P&D STAFF

On the basis of the Initial Study, the staff of Planning and Development:

____ Finds that the proposed project WILL NOT have a significant effect on the environment and, therefore, recommends that a Negative Declaration (ND) be prepared.

__X__ Finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures incorporated into the REVISED PROJECT DESCRIPTION would successfully mitigate the potentially significant impacts. Staff recommends the preparation of an ND. The ND finding is based on the assumption that mitigation measures will be acceptable to the applicant; if not acceptable, a revised Initial Study finding for the preparation of an EIR may result.

____ Finds that the proposed project MAY have a significant effect on the environment, and recommends that an EIR be prepared.

____ Finds that from existing documents (previous EIRs, etc.) that a subsequent document (containing updated and site-specific information, etc.) pursuant to CEQA Sections 15162/15163/15164 should be prepared.

Potentially significant unavoidable adverse impact areas: **None**

_____ With Public Hearing __X__ Without Public Hearing

PREVIOUS DOCUMENT: **None**

PROJECT EVALUATOR: Nancy Minick **DATE:** December 16, 2019

11.0 DETERMINATION BY ENVIRONMENTAL HEARING OFFICER

__X__ I agree with staff conclusions. Preparation of the appropriate document may proceed.

____ I DO NOT agree with staff conclusions. The following actions will be taken:

____ I require consultation and further information prior to making my determination.

SIGNATURE: _____ **INITIAL STUDY DATE:** December 10, 2019

SIGNATURE: _____ **NEGATIVE DECLARATION DATE:** December 16, 2019

SIGNATURE: _____ **REVISION DATE:** _____

SIGNATURE: _____ **FINAL NEGATIVE DECLARATION DATE:** _____

12.0 APPENDICES

1. Project Vicinity and Assessor's Parcel Maps
2. Biological and Preliminary Jurisdictional Wetlands Reports
3. APCD March 14, 2019 Letter
4. Hazards Assessment Final Report