Final Addendum to Goleta Energy Storage Project Final Mitigated Negative Declaration Case Nos. 24-0008-DP(AM), 24-0003-CUP(AM)

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SECTION 1
Introduction

1.1 Overview

The City of Goleta ("City") has prepared this Addendum to the Initial Study and Mitigated Negative Declaration (IS/MND) for the Goleta Energy Storage Project. The Final IS/MND, included in this Addendum as Appendix A, evaluated the potential environmental effects of the Goleta Energy Project and was adopted by the Planning Commission in October 2021. This document is prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations Title 14, §§ 15000 et seq.). The Goleta Energy Storage Project Final IS/MND (2021 Project IS/MND) is available for review at the City of Goleta's CEQA webpage at:https://www.cityofgoleta.org/your-city/planning-and-environmental-review/ceqa-review

1.2 Background – Goleta Energy Storage Project

On October 25, 2021, the Goleta Planning Commission approved the Goleta Energy Storage Project (Case No. 19-0201-DP; 19-0202-DPAM; 19-0202-CUP; 19-0001-SUB; TM 32,061) for the construction of a 60-megawatt (MW) lithium-ion battery energy storage facility that included energy storage megapacks manufactured by Tesla and other project-related equipment. The approved Energy Storage Project is located at 6864 Cortona Drive on Assessor's Parcel Number (APN) 073-140-031. The approved Project also included the construction of an underground tie-in line and associated electrical and telecommunication infrastructure that connected the Project to the existing Southern California Edison (SCE) Isla Vista electrical substation located west of and adjacent to Storke Road. The Final MND for the Goleta Energy Storage Project addressed the associated environmental impacts and mitigation measures. Project construction finished in 2023, and the Goleta Energy Storage Facility has been in operation since December 2023. The 60 MW/ 160 megawatt-hour (MWh) lithium-ion energy facility can power the equivalent of 30,000 households, enough to supply electricity to all of Goleta's residential customer base every day through the hours of greatest demand on the electric system, and is the largest power resource in Santa Barbara County. The Final IS/MND analyzed a larger scale project than is currently being proposed through the augmentation units, as technological advancement enabled smaller battery systems that have the same MW capacity. That is, the Project as analyzed under the Final IS/MND included a larger overall footprint, as more augmentation units were anticipated to meet the needs of the MW capacity of the Project. This larger Project footprint analyzed more construction efforts (i.e. power to install, truck trips, etc.). With the amended Project, there would be fewer Megapacks than evaluated under the IS/MND, leading to a lesser scale of overall impacts, including those associated with construction.

1.3 CEQA Authority for the Addendum Analysis

The CEQA Guidelines (Sections 15162 and 15164) require that a lead agency prepare an addendum to a negative declaration if some changes or additions to the environmental evaluation of a project are necessary but none of the following occurs:

1. There are no substantial changes in the project which require major revisions to the mitigated negative declaration or a substantial increase in the severity of previously identified significant effects;
2. There are no substantial changes with respect to the circumstances under which the project is undertaken which require major revisions to the negative declaration; or
3. No new information of substantial importance, which could not have been known with the exercise of reasonable diligence at the time of negative declaration adoption, shows any of the following:
    i. The project will have one or more significant effects not discussed in the negative declaration,
    ii. The project will result in impacts substantially more severe than those disclosed in the negative declaration,
    iii. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt it, or
    iv. Mitigation measures or alternatives that are considerably different from those analyzed in the negative declaration would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt it.

As demonstrated in Section 3, *Environmental Analysis*, the Project does not meet the criteria for preparing a subsequent Environmental Impact Report or negative declaration as established under CEQA Guidelines Section 15162. Thus, this Addendum has been prepared.

1.4 Scope of Addendum

The purpose of this document is to (1) evaluate proposed changes from conditions first presented under the Goleta Energy Storage Project IS/MND; and (2) to provide documentation to support that the proposed changes would not result in effects that meet the criteria described in CEQA Guidelines Sections 15162 and 15164 and, therefore, an Addendum is appropriate.

1.5 Adoption and Availability of Addendum

This Addendum to the Goleta Energy Storage Project Final IS/MND will be considered by the Planning and Environmental Review Director as part of the amended Project consideration. In accordance with CEQA Guidelines Section 15164(c), an Addendum need not be circulated for public review but can be included in or attached to the Final MND. The decision-making body considers the Addendum with the Final MND before making a decision on the Project.

The Addendum will be available on the City's website for general public reference and at the following locations:

City of Goleta
Planning & Environmental Review Department
130 Cremona Drive, Suite B
Goleta, California 93117

Goleta Library (GVL Express)
6500 Hollister Ave Suite 105
Goleta, California 93117

Goleta Community Center
5679 Hollister Ave
Goleta, California 93117

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SECTION 2
Description of Project Changes

2.1 Project Location

The amended Project site is the same location as the existing Goleta Energy Storage Project site (approved Project), located at 6864 Cortona Drive in the City of Goleta. The Project site is 5.88 gross acres and is southeast of the intersection of the Storke Road/U.S. Highway 101 southbound on-ramp. The Project site's APN is 073-140-031. **Figure 2-1**, *Project Location*, shows the Project site's location and surrounding areas, including the SCE substation on APN 073-140-012.

2.2 Proposed Project Changes

The amended Project would install Powerpack 3 augmentation units to the existing self-contained energy storage and management cabinets (Megapack 2XL) containing battery modules designed and manufactured by Tesla. The Powerpack 3 augmentation units would be installed on existing concrete pads immediately adjacent to the existing Megapacks. The augmentation units would be necessary to maintain the energy goals of the Project for the long-term and meet the power supply contract requirements for the approved 60 MW facility.

The amended Project involves only the placement of up to 132 Powerpack augmentation units on the existing concrete pads.[1] The augmentation units would measure 3.5 feet (43 inches) wide by 5.9 feet (71 inches) deep by 8.25 feet (99 inches) tall and would match the existing Tesla Megapack color[2]. One Powerpack includes three independent battery modules. See **Figure 2-2**, *Amended Project Components*, below for an overview of where the augmentation units would be installed. As stated above, the proposed augmentation units (up to 132 units) would support and maintain the permitted, existing Goleta Energy Storage Project's power supply for long-term use. The augmentation units are required as part of the Capacity Maintenance Agreement (CMA) between Tesla (Project Applicant) and Goleta Energy Storage, LLC (Property Owner). The installation of the augmentation units was previously contemplated for the approved Project and the location for each of the future augmentation units was identified on City-approved Site Plans, but the units were not included nor analyzed in the Energy Storage Project's CEQA review. The concrete pads required to support the augmentation units were part of the approved Project and have been installed. As part of the application, the Applicant provided a Hazards Analysis and Risk Assessment,

1 Concrete pads would be required to support and install the augmentation units, but were previously identified on the City Planning Commission-approved Site Plans and the issued Zoning Clearance and Building Permit Plans for the project, and were installed at the time of Energy Storage Project construction in 2023. Therefore, this current request involves City review and approval for placement of the augmentation units on the existing concrete pads located at the Energy Storage Project.

2 It should also be noted that the Site Plans approved for the Energy Storage Project identified setbacks measured from either the Tesla Megapacks and related approved equipment, or from the augmentation unit concrete pads, whichever was nearer to the property lines, so the current request would not result in a change to the approved Energy Storage Project setbacks.

included as **Appendix B** to this Addendum, as well as Noise and Acoustics Technical Study and Peer Review, included as **Appendix C**.

The amended Project would involve the installation of these Powerpack augmentation units immediately adjacent to the existing Megapacks and connect low-voltage electrical systems between the power supply cabinets, the augmentation units, and the existing equipment. The proposed battery cell type for the Powerpack would be Lithium-Iron Phosphate (LFP) designed and manufactured by Tesla. Each Powerpack cabinet would hold 24 modules of batteries, with each module holding approximately 336 battery cells. The Powerpack units hold 3 modules of batteries each, with up to 3 augmentation units per Megapack (an additional 9 modules total). Each Powerpack measures approximately 3.5 feet in width, 6 feet in depth, and 8.25 feet in height.

Each Powerpack comes with pre-installed components housed in a steel cabinet enclosure. Each Megapack houses several different system components, which are briefly described below:

- **Battery Modules.** Lithium-iron phosphate battery cells are used to store electrical energy. Each battery cell is individually fused, sealed, liquid-cooled, and monitored.
- **Customer Interface Bay.** A user-accessible bay inside the Megapack is designed for unit operation and servicing.
- **Inverters.** SCE's electrical transmission grid operates in alternating current (AC). However, energy stored in the battery modules uses direct current (DC). Therefore, the Megapack includes inverter modules that convert the AC power received from the grid to DC power for storage into the batteries.
- **Thermal Management System.** The Megapack is designed to operate at temperatures between 22 to 122 degrees Fahrenheit. An active liquid thermal management system is incorporated into each Megapack for heating and cooling of the battery cells. The thermal system includes pumps, compressors, condensers, fans, and radiators.

Each new augmentation unit would have a nearly identical design as the approved Megapack, leveraging the same core components:[3]

- **Seamless Integration.** All of the same features and safety certifications of Megapack transfer over to Powerpack.
- **Utility Integration.** Adding additional energy capacity via Powerpack 3 would not alter the plant operation and only provides additional energy to the site to account for battery degradation. The overall site contractual nameplate would not increase or change in any way.
- **Scalable.** Up to 3 Powerpack 3 enclosures can be added to each Megapack to add capacity over the life of the amended Project. Energy augmentation is added to a site as batteries naturally degrade or to benefit site operation.

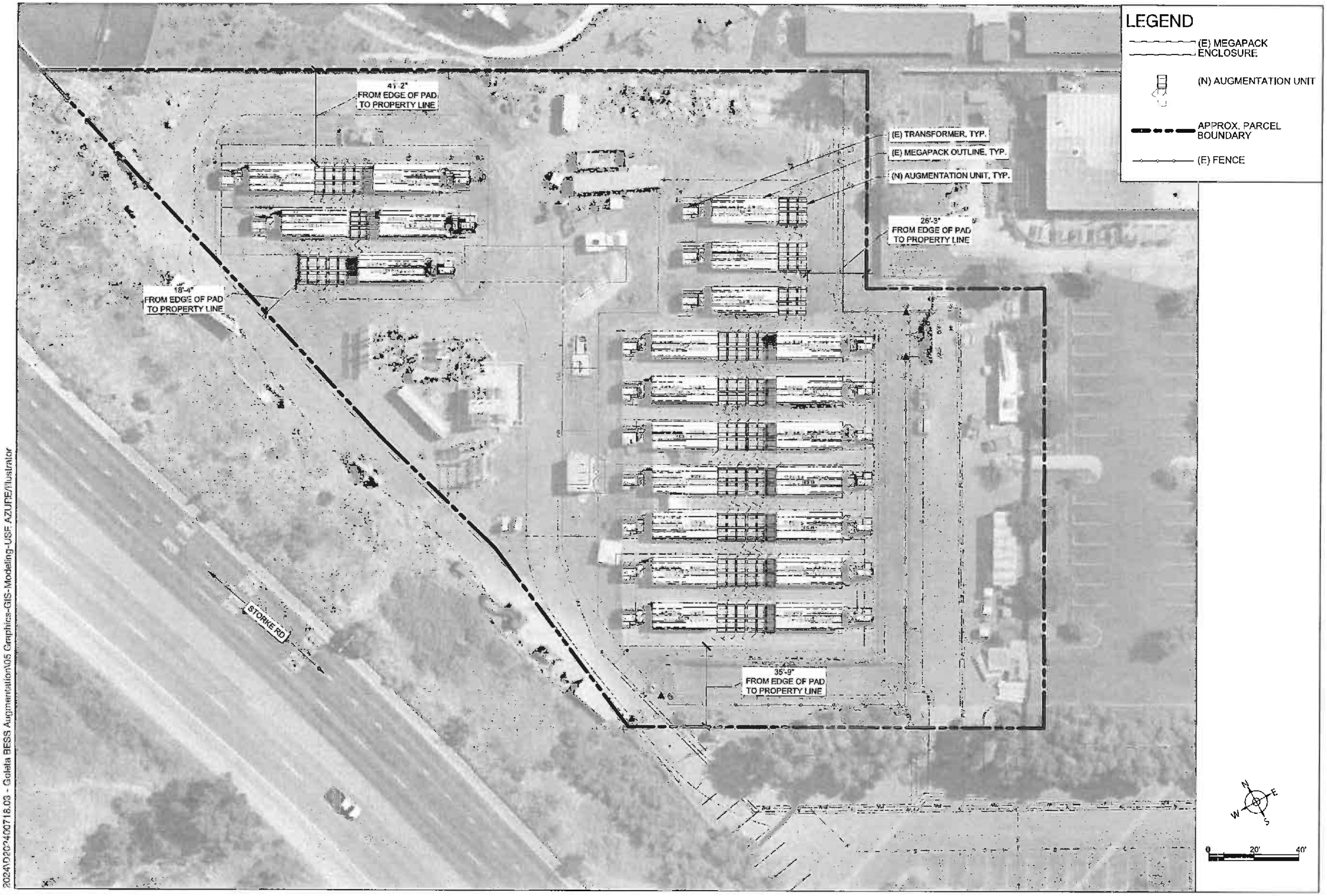
[3] Core components include LFP cell, battery module, inverter, and thermal management.

SOURCE: ESA, 2025; NearMap, 2024

Goleta Energy Storage Augmentation Project

Figure 2-1
Project Location

ESA



SOURCE: Tesla, 2025

Addendum to Goleta Energy Storage Project

Figure 2-2
Amended Project Components

ESA

Megapacks naturally degrade over time, thus augmentation units would be added to maintain the overall site contractual rating with SCE. As such, the installation of Powerpack units under the amended Project would include:

- Anchoring of augmentation units on existing foundations
- Anchoring of power supply cabinets on existing foundations
- Connecting low-voltage electrical cables between power supply cabinets, augmentation units, and existing equipment

The cabinets would be placed at the site outdoors. There would be no walk-in or inhabitable facilities in the amended Project design. As such, fire prevention systems include proposed cabinets designed to limit or eliminate the spread of fire from one cabinet to another, infrared camera monitoring at the site for external fire detection, and onsite fire hydrants. The Battery Management System would monitor all cell voltages, currents, and temperatures and would shut down equipment if unsafe conditions are detected. The Powerpacks would be equipped with ventilation systems to allow for the removal and combustion of off-gassed materials, as are the augmentation units. The Megapack design includes pressure-sensitive vents and a sparker system. These work in combination to mitigate the risks of deflagration and overpressure events by combusting flammable off-gases before they reach the enclosure's lower flammability limit. Refer to Appendix B, the Hazards Analysis and Risk Assessment, for additional details on these features of the Powerpack design.

The augmentation units would operate 24 hours a day, 7 days a week, the same as the approved Project. The existing facility is an unmanned facility, and similarly, the amended Project would not require daily personnel for operation. However, occasional personnel may be needed for maintenance activities as necessary. The proposed augmentation units would be installed on the existing concrete pads, which were originally designed and permitted to support the now proposed augmentation units. No grading or ground disturbance would be required to install the augmentation units, and no new impervious surfaces are proposed. No changes are proposed to the existing landscape screening surrounding the approved Project site.

Access to the site would be from Cortona Drive, a 45-foot-wide, paved two-way city street. The delivery route for the proposed augmentation units would use Los Carneros Road to avoid traffic impacts to the Storke Road/Hollister Avenue intersection. It is anticipated that a maximum of eight workers would be required for the placement of the augmentation unit. Equipment for placement would include a crane to install all Powerpack equipment, and a smaller telehandler/forklift to move smaller materials around the site as needed. Drilling into the foundations using a basic handheld drill would be required to install the wedge anchors used to secure the equipment to the foundations. The construction period would last a maximum of 120 days, with 8 of the days dedicated to crane work and the remainder being preparation, wiring, and commissioning of the units. The installation of the 132 Powerpack units would occur in installments of up to 40 Powerpack units placed at a time. Each installment would take place over a maximum of 30 days. Thus, the construction period for the amended Project would occur in three (3) to four (4) phases, lasting up to 30 days each. Once operational, no personnel or equipment would be required on a day-to-day basis during the Project's estimated 20-year lifetime.

Decommissioning of the Project would require the same activities and types of equipment as the Goleta Energy Storage Project, which would include the removal of Megapacks/Powerpacks from the foundations, disconnection of wiring, and transport of the Megapacks/Powerpacks to an approved recycling facility. It is conservatively assumed that amended Project decommissioning would occur in 2040 and a decommissioning plan would be required prior to the start of construction.

SECTION 3
CEQA Environmental Analysis

This section of the Addendum provides analysis and cites substantial evidence that supports the conclusion that the battery energy storage system (BESS) facility augmentation does not meet the criteria that would require preparation of a subsequent Environmental Impact Report or a negative declaration. The Project, as revised, would not cause a new significant impact or a substantial increase in the severity of a significant impact previously identified and evaluated in the 2021 Goleta Energy Storage Project IS/MND (2021 Project IS/MND).

The focus of the analysis in this Addendum is the proposed placement of up to 132 Powerpack augmentation units installed in phases, with the first phase consisting of 40 units. The installation would occur within the existing Project footprint.

Project operation activities would be consistent with operations of the Goleta Energy Storage Project (monthly and bi-monthly inspection and maintenance). No new staff would be required for proposed Project operations. Therefore, impacts related to augmentation unit operations are not discussed further in this Addendum.

In addition, since decommissioning activities for the augmentation units would be the same as or substantially similar to the Goleta Energy Storage Project decommissioning, the amended Project would remove the augmentation units from the foundations and transport them to an approved recycling facility for proper disposal, the same as what was analyzed in the Project IS/MND. Thus, there would be no new or different impacts than those already analyzed as part of the 2021 Project IS/MND. Thus, impacts related to augmentation unit decommissioning are not discussed further in this Addendum.

3.1 Aesthetics

Section 15-A of the 2021 Project IS/MND analyzed impacts to the aesthetics of the Project area and found that development of the approved Project would not adversely affect scenic vistas, damage scenic resources within a state scenic highway, degrade the existing visual character or quality of public views, or create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. The analysis concluded that the approved Project would result in less-than-significant impacts related to changes in existing conditions at the Project site or public viewpoints, as well as potential conflicts with scenic protection policies. No mitigation measures were proposed. However, the 2021 Project IS/MND assumed two standard conditions of approval (Project Conditions) regarding architectural review and lighting specifications. The Applicant was required to receive Design Review Board approval of the site plan, and to install exterior lighting of a kind that would prevent spill-over onto adjacent parcels. These two standard conditions ensured the approved Project's compliance with City's aesthetic and design standards.

The amended Project would include the installation of Powerpacks and associated electrical infrastructure adjacent to the existing Megapacks. Each Powerpack measures approximately 3.5 feet in width, 6 feet in depth, and 8.25 feet in height. The proposed Powerpacks would be consistent with the existing Megapacks, which are 9 feet in height, and with other related equipment with a height of less than 10 feet. Thus, the amended Project would include the installation of energy storage equipment of similar height and visual characteristics, including materials and color, as the existing energy storage equipment. As determined in the Design Review Findings as part of the 2021 Project IS/MND, the proposed BESS development would be compatible with the neighborhood and its size, bulk and scale and remains appropriate to the site and neighborhood. In addition, the two approved Project Conditions related to light/glare and design review would continue to apply to the amended Project (Resolution No. 21-09, Exhibit 2, Permit Conditions no. 33, 34, and 52).

On February 20, 2025, the chair of the Design Review Board reviewed the proposed augmentation units design plans and confirmed that the augmentation units would look very similar to what exists on the site, and would be smaller than the approved Tesla Megapacks. Additionally, the Applicant previously speculated and identified the potential need for future augmentation units in their original plans. For these reasons, further Design Review Board approval would not be needed. The Lighting Specifications Project Condition would ensure exterior lighting fixtures would be kept to the minimum lighting level and intensity needed to ensure public safety, thus minimizing impacts with regard to light and glare. Therefore, installation of the Powerpacks would not result in new impacts or a substantial increase in impacts to aesthetics and visual resources over those identified and evaluated in the 2021 Project IS/MND.

3.2 Agriculture and Forestry Resources

Section 15-B of the 2021 Project IS/MND analyzed impacts to agricultural and forestry resources and found that development of the approved Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The approved Project would also not conflict with existing zoning or Williamson Act contracts, zoning for forest lands, result in the loss of forest land, or involve changes in the existing environment that could result in the conversion of farmland. The 2021 Project IS/MND concluded that the approved Project would result in no impacts pertaining to agricultural and forest resources. Relating to agriculture and forestry resources, the MND did not include mitigation measures or conditions of approval, and the approved Development Plan did not include Permit Conditions.

Since the proposed changes would occur on the existing concrete pads within the approved Project site and not on agricultural or forested land, there would be no conversion of farmland or forest resources and there would be no conflict with existing agricultural zoning. There would be no impact to agriculture and forestry resources from construction because the proposed changes would occur on the approved Project's site, which does not contain any agricultural or forested land. Installation of the Powerpack units would use urban roads that would not require improvements and do not pass through agricultural or forested lands. Therefore, the installation of the amended Project would not result in new impacts or a substantial increase in impacts over those identified and evaluated in the 2021 Project IS/MND related to agricultural and forestry resources.

3.3 Air Quality

Section 15-C of the 2021 Project IS/MND analyzed impacts to air quality and concluded that development of the approved Project would cause less-than-significant impacts due to construction activities, and would not result in regional or local emissions of criteria air pollutants or precursors that exceed applicable thresholds of significance of the Santa Barbara County Air Pollution Control District (SBCAPCD). The MND did not include mitigation measures or conditions of approval related to air quality; however, the approved Development Plan did include Permit Conditions relating to compliance with SBCAPCD dust control requirements (Resolution No. 21-09, Exhibit 2, Permit Condition no. 41)

The amended Project would necessitate the use of a crane for a maximum of 2 days and a telehandler/forklift during the 30-day construction period. There would be no grading or ground-disturbing activities, as the augmentation units would be placed on the already existing concrete pads. The use of the crane and telehandler/forklift would generate construction emissions in addition to those already generated by the approved Project. However, the amended Project's new annual construction emissions would be less than those disclosed in the IS/MND for the approved Project, as the IS/MND analyzed a larger project in terms of number of units necessary for the same MW capacity, with a longer construction period requiring more earthwork, construction equipment, and personnel. Thus, emissions would remain below the SBCAPCD construction significance thresholds. Since the installation of the augmentation units would require no ground-disturbing activity and fewer pieces and types of construction equipment than the approved Project, impacts to air quality from construction activities would be similar to those disclosed for the approved Project. Therefore, the installation of the amended Project would not result in new impacts or a substantial increase in impacts over those identified and evaluated in the 2021 Project IS/MND with respect to air quality.

3.4 Biological Resources

Section 15-D of the 2021 Project IS/MND analyzed impacts on biological resources and found that, with proposed mitigation, development of the approved Project would not have a substantial adverse effect on any candidate, sensitive, or special status species. The approved Project would not have a substantial adverse effect on riparian habitat or wetland habitat. It would also not interfere with the movement of migratory species, conflict with local policy regarding biological resources, or conflict with provisions of an adopted Habitat Conservation Plan. The analysis concluded that the approved Project would result in a less-than-significant impact with mitigation related to changes in existing conditions at the Project site and impacts to biological resources.

Under 2021 Project IS/MND Mitigation Measure BIO-1, the approved Project would avoid disturbance of nesting and special status birds, including raptor species protected by the Migratory Bird Treaty Act and California Fish and Game Code, by performing construction outside of the bird nesting season (February 1 through August 31), if feasible. However, if the approved Project needed to perform construction activities during the breeding season of nesting and special-status birds, including raptor species, Mitigation Measure BIO-1 required the applicant to pay for a pre-construction nesting bird survey that would occur no more than 7 days prior to construction. The nesting bird survey would be conducted inside the project footprint, plus a 500-foot buffer for raptors and special-status species, and a 300-foot buffer for all other birds. Additionally, inaccessible parts of the survey area would be scanned using binoculars to ensure 100 percent visual coverage. Mitigation Measure BIO-1 required that the survey be conducted by a biologist familiar with the identification of bird species known to occur in southern California communities. If active nests (those containing eggs, nestlings, or associated with dependent fledglings) were found on site, an avoidance buffer would have been implemented around each nest and demarcated with fencing or flagging at a size determined by the biologist based upon the species. No Project activity would occur inside a nest buffer until the biologist determines that the nest is no longer active. However, if no nesting birds were observed during pre-construction surveys, no further actions would be necessary.

The amended Project would be required to implement Mitigation Measure BIO-1 described above and in the 2021 Project IS/MND. This mitigation measure would ensure that the impacts to nesting birds and special status birds, including raptor species protected by the Migratory Bird Treaty Act and California Fish and Game Code, would be reduced to less-than-significant by avoiding potential disturbances. All pre-construction survey requirements would apply to the augmentation units if construction occurs during the applicable nesting timeframe outlined in the 2021 Project IS/MND. Accordingly, impacts to nesting birds would remain unchanged from those outlined in the 2021 Project IS/MND by completing preconstruction surveys, avoiding nesting birds, and establishing buffer zones as warranted; the buffer zone may vary depending on species- and site-specific conditions as approved by California Department of Fish and Wildlife.

The 2021 Project IS/MND found that there were no sensitive natural communities present on the Project site, nor were there wildlife corridors present. This would remain true for the amended Project, as the amended Project would occur on the same existing Goleta Energy Storage facility site. Therefore, there would be no additional impact on these habitats.

The 2021 Project IS/MND determined that there would be potential impairment of downstream receiving waters (such as the Goleta Slough) due to discharges of sediment and other construction-related materials, such as solid waste and other debris, concrete and asphalt, paint, metals, fuel, and other automotive products. Implementation of construction site regulatory requirements (including the preparation of a Storm Water Pollution Prevention Plan), which are described in Section J of the 2021 Project IS/MND (Hydrology and Water Quality), would result in a less-than-significant potential for release of construction-related pollutants at the construction site that could adversely affect downstream waters and habitats. The amended Project would be required to implement the same construction site regulatory requirements (including adherence to the previously required Storm Water Pollution Prevention Plan), which would lower the impacts to downstream waters and habitats to a less-than-significant impact.

The 2021 Project IS/MND also stated that the approved Project would have a less-than-significant impact related to conflicts with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The approved Project included the removal of ornamental parking lot trees, which conflicted with Conservation Element Policy CE 9 of the City of Goleta General Plan/Coastal Land Use Plan. However, the amended Project would not involve the removal of any trees and would therefore be consistent with local policy. Since the amended Project would only involve construction within the already disturbed and paved existing Goleta Energy Storage facility site, the amended Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and would therefore have no impact.

Finally, the 2021 Project IS/MND found that the approved Project would not be subject to a Habitat Conservation Plan, Natural Conservation Community plan, or other local, regional, or state habitat conservation plan and there would therefore be no impact. No applicable plans have been adopted for the approved Project site since 2021, so there would also be no impact.

With implementation of Mitigation Measure BIO-1 and implementation of the necessary construction site regulatory requirements (including the implementation of a Storm Water Pollution Prevention Plan), the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND.

3.5 Cultural Resources

Section 15-E of the 2021 Project IS/MND analyzed impacts to cultural resources and noted that potentially significant impacts would occur within portions of significant archaeological resources during ground disturbances associated with the Project. The IS/MND concluded that there would be no impact to the change in the significance of a historical architectural resource pursuant to CEQA Guidelines Section 15064.5. The IS/MND concluded that with implementation of Mitigation Measures CR-1, CR-2, CR-3, CR-4, and CR-5 there would be a less-than-significant impact on archaeological resources pursuant to CEQA Guidelines Section 15064.5. These measures require construction monitoring (CR-1); the placement of fill material over portions of the Project site to protect cultural resources (CR-2); conducting a data recovery program at the Project site (CR-3); conducting a pre-construction workshop for construction personnel (CR-4); and the preparation and implementation of a Construction Monitoring and Treatment Plan (CR-5). Additionally, the approved Development Plan did include Permit Conditions relating to cultural resources.

Rincon Consultants Inc. implemented CR-2 and CR-3 prior to ground-disturbing activities. The results are reported in the Goleta Energy Storage Project Cultural Resources Limited Phase 3 Data Recovery Program Report . Rincon Consultants Inc. also completed CR-1, CR-4, and CR-5 during ground disturbing activities associated with the Project. The results are reported in the Goleta Energy Storage Project Archaeological and Native American Monitoring Report .[4] The conditions of these mitigation measures required by the IS/MND have been met.

The Powerpack 3 augmentation units would be installed on existing concrete pads immediately adjacent to the existing Megapacks. Because the amended Project would not include any ground disturbance, there is no potential to impact archaeological resources. Therefore, the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND.

4 The Goleta Energy Storage Project Cultural Resources Limited Phase 3 Data Recovery Program Report is a report that contains sensitive cultural information. The report is date December 2023.

3.6 Energy

Section 15-F of the 2021 Project IS/MND analyzed potential impacts to energy demand and wasteful uses of energy, and potential conflicts with a renewable energy or energy efficiency plan and concluded that the approved Project would have less-than-significant impacts. The City of Goleta's General Plan Conservation Element Implementation Action 5 (CE-IA-5); 2014 Climate Action Plan; and 2012 Energy Efficiency Action Plan identify measures to effectively meet State of California established greenhouse gas (GHG) reduction targets and energy efficiency goals, as consistent with Assembly Bill 32 and the California Public Utilities Commission's Long-Term Energy Efficiency Strategic Plan. Similar to the approved Project, implementation of the amended Project would be consistent with the energy- related goals and objectives outlined in these plans, as the amended Project would facilitate the use of renewable solar power by storing energy generated during daytime hours for subsequent use during peak energy use periods and when solar power cannot be produced. The 2021 Project IS/MND did not include mitigation measures or conditions of approval related to energy.

During construction, the energy use of the amended Project would be primarily in the form of fuel consumption to operate light-duty vehicles and machinery. However, energy use during construction would be temporary, with each of the construction phases lasting approximately 30 days in duration. Construction equipment used would consist of a crane and a smaller telehandler/forklift. Compared to the heavy-duty machinery and equipment analyzed under the approved Project, the construction of the augmentation units would not result in new impacts or a substantial increase in impacts over those identified and evaluated in the 2021 Project IS/MND.

Substantially similar to the approved Project, operation of the amended Project would require the use of energy for equipment such as cooling fans, remote monitoring, on-site lighting, and vehicles used by employees for periodic inspections of the facility. However, when considering this energy use with the energy provided by the Powerpacks, there would be a net benefit in energy supplied to the region. Therefore, the amended Project would not use energy in a wasteful, inefficient, or unnecessary manner. Like the approved Project, the amended Project would expand SCE's access to energy storage systems, which would increase the stability and reliability of the existing electrical grid, thereby reducing the need for additional electricity to be generated by fossil fuel power plants during peak energy demand hours. The energy storage capacity of the amended Project would also facilitate the use of renewable energy sources (such as solar energy). Overall, the amended Project would yield a net benefit to energy resources in the region. In conclusion, the installation of the augmentation units would not result in new impacts or a substantial increase in impacts over those identified and evaluated in the 2021 Project IS/MND with respect to energy.

3.7 Geology/Soils

Section 15-G of the 2021 Project IS/MND analyzed potential impacts to geology and soils and concluded that installation of the BESS facility would not result in rupture of a known earthquake fault, seismic shaking, liquefaction, or landslides. The approved Project would also have a less-than-significant impact to soil erosion and loss of topsoil during construction. It would not be located on expansive soil that creates a risk to life or property, and there would be no impact of wastewater disposal on soil. The approved Project would have a less-than-significant impact on a unique paleontological resource or site or unique geologic feature. The MND did not include mitigation measures or conditions of approval related to geology;

however, the approved Development Plan did include Permit Conditions relating to geotechnical review (Resolution No. 21-09, Exhibit 2, Permit Conditions no. 35).

Unlike the approved Project, the amended Project would not require any earthmoving activities, and access to the site already exists through a 45-foot-wide, paved two-way city street. The augmentation units would be placed on already existing concrete pads, so no ground disturbance would occur. The amended Project would occur in the exact same location as the approved Project, thus the soil profile would be the same. Similarly, there are no designated Alquist-Priolo fault zones in the City of Goleta[5]. Thus, the installation of the augmentation units would not result in new geologic impacts or a substantial increase in geologic impacts over those identified and evaluated in the 2021 Project IS/MND.

3.8 Greenhouse Gas Emissions

Section 15-H of the 2021 Project IS/MND analyzed GHG emissions and concluded that there would be less-than-significant impacts due to GHG emissions or on a plan or policy that regulates GHG emissions. The approved Project was found to not result in significant project-specific or cumulative GHG emission impacts. The MND did not include mitigation measures or conditions of approval related to GHG emissions.

Similarly, the amended Project would generate new construction-related emissions from the equipment (crane and smaller telehandler/forklift) as well as worker trips of up to 8 workers to and from the site, during each phase of augmentation unit installation. These new construction-related emissions would be temporary and less than the thresholds analyzed under the 2021 Project IS/MND. While there would be no associated daily emissions once operational, operational emissions could be generated from monthly on-road vehicular traffic for maintenance trips, but these would be infrequent and would not be greater than trips to the site under the approved Project. Therefore, installation of the augmentation units would not result in new significant impacts or a substantial increase in the severity of impacts over those identified and evaluated in the 2021 Project IS/MND.

3.9 Hazards and Hazardous Materials

Section 15-I of the 2021 Project IS/MND analyzed impacts on hazards and hazardous materials and found that development of the approved Project would not create a significant hazard to the public from the routine transport, use, or disposal of hazardous materials through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. It would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. It would not be located on a site that is included on a list of hazardous materials sites, result in a safety hazard or excessive noise for people residing or working in the Project area within 2 miles of a public airport, impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, or expose people or structure to a significant risk of loss, injury or death involving wildland fires. The analysis concluded that the approved Project would result in no impacts pertaining to hazards and hazardous materials. The MND did not include mitigation measures or conditions of approval related to hazardous materials; however, the approved Development Plan did include Permit Conditions relating to Megapack installation, operation and safety planning, and fire risk

[5] Source: California Geologic Survey. 2025. Earthquake Zones of Required Investigation. Map search term: Goleta. Accessed June 26, 2025. https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/.

(Resolution No. 21-09, Exhibit 2, Permit Conditions no. 36, 37, and 40). The 2021 Project IS/MND determined that there would be a less-than-significant impact related to potential safety risks related to the release of asbestos and risks associated with battery failure.

According to the risk assessment performed in the *Hazards Analysis and Risk Assessment Final Report* (Appendix B) battery failures at the amended Project site that produce out-gassing[6] would likely be addressed with the application of water by the County Fire Department. However, these would be rare occurrences, as they are estimated to have a probability of occurring once every 10,989 years (Appendix B). Like the approved Project, the amended Project would use a Battery Management System to monitor all cell voltages, currents, and temperatures and would shut down equipment if unsafe conditions are detected. As stated in Section 2.2, *Proposed Project Changes*, the Powerpacks would be equipped with ventilation systems to allow for the removal and combustion of out-gassed materials. The Megapack/Powerpack design includes pressure-sensitive vents and a sparker system. These work in combination to mitigate the risks of deflagration and overpressure events by combusting flammable gases before they reach the enclosure's lower flammability limit. Refer to Appendix B for the Hazards and Risk Assessment for these features of the Powerpack design.

The approved Project was not located within 0.25 miles of a school, and the amended Project would be on the same Project site. Therefore, the amended Project would not result in hazardous emissions that could affect nearby schools, and the amended Project would have no impact related to hazardous material emissions near a school.

While the southern portion of the approved Project site was impacted by the historic release of chlorinated volatile organic compounds due to past industrial operations, the approved Project did not include development in the southern portion of the site and did not interfere with the operation of any existing or future remediation activities. Similarly, the amended Project would not interfere with any existing or future remediation activities, because construction would occur on the already developed concrete pads on the Project site away from the contaminated site. Potential impacts associated with the previous hazardous material release on the Project site would continue to be less than significant.

As stated in the 2021 Project IS/MND, the approved Project is located north of the Santa Barbara Municipal Airport Approach Zone. The amended Project would be located at the same site as the approved Project site and would therefore also be located north of the Santa Barbara Municipal Airport Approach Zone. The Project changes would include the construction of Powerpacks that reach 9 feet in height, which is lower than the approved Project-related equipment, which reach up to 30 feet in height, so would not introduce a new safety hazard to approaching aircraft. As described in Section 3.1, *Aesthetics*, the amended Project would not create a new source of substantial light or glare, so there would not be any potential to interference with aircraft operations. Therefore, there would be no new impact on airport compatibility.

6 Out-gassing refers to the process by which toxic and flammable materials are produced and then released during an upset condition.

Similar to the approved Project, the amended Project would not generate a substantial amount of construction-based traffic or operation-related traffic. Therefore, the amended Project would not interfere with access for emergency personnel, and there would continue to be a less-than-significant impact regarding implementation of adopted emergency response plans or emergency evacuation plans.

Since the Project site remains the same, the nearest designated Very High Fire Hazard Severity Zone is 0.5 miles north of the amended Project site, as mapped by the California Department of Forestry and Fire Protection. The proposed Project would not include structures that would accommodate permanent occupants such as residents or full-time employees. Furthermore, as stated above, fire prevention systems for the amended Project include proposed cabinets designed to limit or eliminate the spread of fire from one cabinet to another, infrared camera monitoring at the site for external fire detection, and onsite fire hydrants. These fire prevention systems would ensure that the Project would result in less-than-significant impacts related to wildland fires.

For these reasons, installation of the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND.

3.10 Hydrology/Water Quality

Section 15-J of the 2021 Project IS/MND analyzed impacts on hydrology and water quality and concluded that the approved Project would cause less-than-significant impacts to groundwater. Additionally, the 2021 Project IS/MND determined that it would not exceed National Pollutant Discharge Elimination System (NPDES) discharge standards, alter existing drainage patterns, or create runoff since the approved Project resulted in a net loss of impervious surfaces. The approved Project site is not located in a designated 100-year floodplain or tsunami runup zone, nor are there any bodies of water near the Project site. Finally, the approved Project would not result in water supply or quality impacts that would conflict with applicable groundwater basin management plans or requirements. The MND did not include mitigation measures or conditions of approval related to hydrology; however, the approved Development Plan did include Permit Conditions relating to groundwater, drainage and stormwater, and pollutant discharge (Resolution No. 21-09, Exhibit 2, Permit Conditions no. 42, 44, 45, 47, and 48).

The installation of the Powerpacks for the amended Project would be on an existing concrete pad in the approved Project site. During construction, workers would also be required to comply with the conditions of the NPDES General Construction Permit, which would ensure that potential water quality impacts would be minimized. Furthermore, as described in Section 3.9, *Hazards and Hazardous Materials*, a spill prevention plan would be implemented to mitigate potential hazardous material spills. The spill prevention plan would prevent hazardous materials from entering local waterways. The amended Project would not require in-water work, or be located in a designated 100-year floodplain, tsunami runup zone, or near any bodies of water. Thus, construction and operation and maintenance of the amended Project would not violate any water quality standards. Therefore, installation of the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND.

3.11 Land Use/Planning

Section 15-K of the 2021 Project IS/MND analyzed impacts related to land use planning and concluded that the approved Project would not divide an established community and would have a less-than-significant impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The MND did not include mitigation measures or conditions of approval related to land use; however, the approved Development Plan did include Permit Conditions relating to additional permit review (Resolution No. 21-09, Exhibit 2, Permit Conditions no. 1, 3, 4, 5, and 19).

The approved Project is a "major utility" project that is allowed in the Business Park zone with the approval of a Conditional Use Permit. As such the amended Project would be allowed in that same zone with the approval of a Conditional Use Permit. The amended Project would not divide an established community or conflict with any new land use plans, policies, or regulations specific to avoiding or mitigating an environmental effect. Therefore, the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND.

3.12 Mineral Resources

Section 15-L of the 2021 Project IS/MND analyzed potential impacts to mineral resources and concluded that installation of the BESS facility would have no impact on the loss or availability of known mineral resources in the region. As identified in the 2021 Project IS/MND, no known mineral resources have been identified on or near the approved Project site. The MND did not include mitigation measures or conditions of approval, and the approved Development Plan did not include Permit Conditions relating to mineral resources.

Similarly, since the amended Project would also exist in the same location as identified in the 2021 Project IS/MND, no known mineral resources would occur on or near the amended Project site. Thus, the installation of the augmentation units would not result in new impacts or a substantial increase in the severity of impacts over those identified and evaluated in the 2021 Project IS/MND related to mineral resources.

3.13 Noise

Section 15-M of the 2021 Project IS/MND analyzed noise impacts and concluded that the approved Project would result in a less-than-significant impact based on modeled noise levels and compliance with the City of Goleta's Noise Element and Municipal Code thresholds. The MND did not include mitigation measures or conditions of approval related to noise; however, the approved Development Plan did include Permit Conditions relating to construction timing and noise complaints (Resolution No. 21-09, Exhibit 2, Permit Conditions no. 38 and 39).

The amended Project involves a short construction period of approximately four phases, each phase lasting approximately 30 days. No grading or ground disturbance would be required. Construction equipment during each phase would be limited to a crane for approximately two days, a telehandler or forklift for on-site material movement, and handheld drills to install wedge anchors into existing foundations. Given the similar types of construction equipment and duration of construction activities that would occur under the amended Project relative to the approved Project, amended Project construction noise impacts would be the same as those described for the approved Project as disclosed in the 2021 Project IS/MND. Construction noise could temporarily affect nearby sensitive receptors, including a three-story apartment adjacent to the northern boundary, a hotel approximately 350 feet south, and a residential neighborhood approximately 240 feet west of the Project site across Storke Road. However, the minimal construction activities would involve the limited use of heavy equipment that would occur during daytime hours (8:00 a.m. to 5:00 p.m.) and construction-related noise would be temporary. Additionally, construction activities would continue to be subject to the City's conditions of approval, which require compliance with time and day restrictions on construction operations. Construction noise impacts would remain less than significant.

A Noise Study was prepared by Dudek entitled *Goleta Energy Storage Systems Facility Operational Noise Prediction Update*, for the Applicant to address the augmentation to the approved Project. 45dB Acoustics LLC conducted a peer review of the Noise Study. Appendix C contains the Noise Study, peer review, and Dudek's response to the peer review. The noise analysis evaluated the amended Project design and assessed any changes in environmental effects. The peer review confirmed that the amended Project, as modeled, would remain compliant with the applicable noise standards for overall noise exposure relative to the Community Noise Equivalent Level (CNEL) at nearby sensitive receptors, consistent with the findings of the approved Project. The reviewer noted that the 2021 Project IS/MND and the study to support this addendum evaluate operational noise exposure levels consistent with the City's General Plan Noise element and municipal code that incorporates the CNEL, which is a noise metric that considers differences in the intrusiveness of noise between daytime hours and nighttime hours.

The peer-review memo also noted model uncertainties associated with the original Noise Technical Memo prepared to support the conclusions of the IS/MND, such as Tesla's noise emission data, which could have resulted in under-estimated approved Project noise levels. However, in its response to the 45dB acoustics peer review, Dudek referenced operational noise level data from a survey conducted at the Goleta Energy Storage Systems Facility conducted at the site on January 17 and 18, 2024, to show that the approved Project noise levels identified in the IS/MND are supported by actual noise measurement data of approved Project operations (see Appendix C).

The reviewer recommended that, if noise complaints are received, the City will follow the procedures outlined in the approved Project's recommended conditions of approval that address noise complaints. The reviewer also recommended specific acoustic measurement techniques. These recommendations are addressed through a minor modification to Permit Condition No. 39, an existing condition of the approved Project. As revised, Condition No. 39 clarifies that if a post-installation noise survey determined the amended Project exceeds the City's allowable CNEL threshold at nearby sensitive receptors, appropriate noise reduction measures must be implemented to bring the amended Project into compliance. Although there appears to have been no noise complaints received by the owner and operator of the approved Project during the nearly two years of its operation (see Appendix C), the methodology and technical specifications of any noise survey conducted pursuant to Permit Condition No. 39 will be determined by the City in coordination with its qualified acoustical consultant.

While the peer review provided considerations for future monitoring and potential noise reduction suggestions, it does not present substantial evidence that the amended Project would result in new or more severe significant noise impacts than the ones analyzed in the approved Project. Furthermore, the Dudek response to the peer review includes data from a noise survey conducted with adequate sound-measuring instrumentation that empirically substantiates the findings of IS/MND and this addendum. No additional noise-generating equipment or major operational changes are being introduced. Therefore, the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND to noise and noise impacts would remain less than significant.

3.14 Population and Housing

Section 15-N of the 2021 Project IS/MND analyzed impacts on population and housing and concluded that there would be a less-than-significant impact with respect to substantial unplanned population growth in the area, and no impact with respect to the displacement of substantial numbers of existing people. The MND did not include mitigation measures or conditions of approval, and the approved Development Plan did not include Permit Conditions relating to population and housing.

The amended Project would not result in the development of housing or businesses that would generate population growth. The amended Project would provide additional energy storage capacity but not change the amount of energy currently being provided to the area. The augmentation units would continue to support the BESS facilities' ability to store provide power for Goleta's electric customer base through the hours of greatest demand on the electric system, The amended Project would not facilitate the development of land that was previously undeveloped, as the amended Project would occur within the existing footprint of the approved Project. In addition, it would not result in the removal of any housing, and would not displace any people. Therefore, the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND to population and housing.

3.15 Public Services

Section 15-N of the 2021 Project IS/MND analyzed impacts to public services and concluded that there would be no generation of new population growth, increase of staff to maintain facilities, or increase in the demand for public services in the region. With a four-month construction period for the approved Project, the 2021 Project IS/MND concluded there would be a minimal demand for fire and police services on a daily basis and would not result in the need for new or physically altered fire or police facilities to maintain acceptable service ratios, response times, or other performance objectives. It would not result in the need for new or physically altered schools, parks, or other public facilities. Relating to public services, the MND did not include mitigation measures or conditions of approval, and the approved Development Plan did not include Permit Conditions.

Similarly, the amended Project would not increase the demand for public services such as schools, parks, police, and/or other public facilities. The amended Project would have a maximum of four 30-day construction phases, as well as have security fencing around the site perimeter to minimize potential trespassing. With the short construction duration and security fencing, the amended Project would have a minimal or negligible demand for fire and police services on a daily basis. In addition, the amended Project would not directly or indirectly result in additional population growth in the City, and as a result, would not cause an increased demand for services provided by existing schools, parks, or other public facilities.

Therefore, the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND to public services.

3.16 Recreation

Section 15-O of the 2021 Project IS/MND analyzed impacts to recreation and concluded that there would be no impacts associated with the approved Project. The approved Project would not result in population growth, so no new recreational facilities would be needed to accommodate additional recreation facility use. The approved Project would not cause an increased demand for the use of existing parks or other recreational facilities, nor require the construction or expansion of such facilities. The MND did not include mitigation measures or conditions of approval, and the approved Development Plan did not include Permit Conditions relating to recreational resources.

Similarly, the amended Project would not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND to recreation facilities.

3.17 Transportation

Section 15-P of the 2021 Project IS/MND analyzed impacts to transportation and concluded that the approved Project would result in less-than-significant impacts, primarily due to a temporary increase in vehicle traffic during construction. The MND did not include mitigation measures or conditions of approval related to transportation; however, the approved Development Plan did include Permit Conditions relating to public right-of-way improvements and encroachments (Resolution No. 21-09, Exhibit 2, Permit Conditions no. 37 and 46).

Impacts would be limited to the construction phase of the amended Project, given that the facility is unmanned once operational. Construction is expected to occur in up to four phases, lasting approximately 30 days for placement of up to 40 augmentation units at a time, with each phase having only 2 days involving crane operations and a maximum of eight workers on site for the installation of the augmentation units. Additionally, delivery routes for the augmentation units would use Los Carneros Road to reach Cortona Drive, avoiding the Storke Road and Hollister Avenue intersection that was originally used for deliveries under the approved Project. Los Carneros Road experiences lower daily traffic volumes than Storke Road and Hollister Avenue, and the amended Project's short construction period and minimal number of vehicle trips would not increase traffic substantially enough to cause a significant impact. Therefore, the amended Project would not result in new or significant transportation impacts or a substantial increase in the severity of previously identified impacts as evaluated in the 2021 Project IS/MND.

3.18 Tribal Cultural Resources

Section 15-Q of the 2021 Project IS/MND analyzed impacts to tribal cultural resources and noted that potentially significant impacts would occur within portions of significant tribal cultural resources during ground disturbances associated with the Project. The IS/MND concluded that with implementation of Mitigation Measures CR-1, CR-2, CR-3, CR-4, and CR-5, there would be a less-than-significant impact on tribal cultural resources pursuant to CEQA Guidelines Section 15064.5. These measures require construction monitoring (CR-1); the placement of fill material over portions of the Project site to protect cultural resources (CR-2); conducting a data recovery program at the Project site (CR-3); conducting a pre-construction workshop for construction personnel (CR-4); and the preparation and implementation of a Construction Monitoring and Treatment Plan (CR-5).

The Powerpack 3 augmentation units would be installed on existing concrete pads immediately adjacent to the existing Megapacks. Because the amended Project would not include any ground disturbance, there is no potential to impact tribal cultural resources. Therefore, the amended Project would not result in new significant impacts or a substantial increase in severity of impacts over those identified and evaluated in the 2021 Project IS/MND.

3.19 Utilities/Service Systems

Section 15-R of the 2021 Project IS/MND analyzed impacts to utilities and service systems and concluded that there would be less-than-significant impacts to all issue areas considered. The BESS installation construction would not include or require the relocation or construction of new or expanded wastewater treatment or stormwater drainage, natural gas, or telecommunications facilities. BESS facility construction activities would generate minimal waste during temporary construction activities, which would be properly disposed of at the Tajiguas Landfill or the South Coast Recycling and Transfer Station as appropriate. Both facilities had the capacity to accept the minimal amount of waste generated by the approved Project. The MND did not include mitigation measures or conditions of approval related to utilities or service systems; however, the approved Development Plan did include Permit Conditions relating to water and sanitary service connections, solid waste and recycling, and stormwater management (Resolution No. 21-09, Exhibit 2, Permit Conditions no. 42, 43, 45, 47, and 48).

Installation of the augmentation units would not generate wastewater, cause additional stormwater runoff, require new water entitlements, or impact any wastewater providers' ability to serve existing and projected commitments. Any waste generated during amended Project construction would be disposed of in an approved dump site, however, this would not affect local landfill capacities. As presented in the 2021 Project IS/MND, the Tajiguas Landfill is permitted to accept up to 1,500 tons of municipal solid waste and yard waste per day. It is reasonable to assume that the installation of the augmentation units would generate a negligible amount of waste; an amount which the landfill has ample capacity to handle. Impacts relating to the installation of the augmentation units would be similar to and less than the components analyzed in the 2021 Project IS/MND. Therefore, installation of the augmentation units would not result in new impacts or a substantial increase in the severity of impacts over those identified and evaluated in the 2021 Project IS/MND related to utilities and service systems.

3.20 Wildfire

Section 15-S of the 2021 Project IS/MND analyzed impacts to wildfire and concluded that there would be a less-than-significant impact to an adopted emergency response plan, exacerbation of wildfire spread, increase in fire risk, or impact to people or structures. The MND did not include mitigation measures or conditions of approval related to wildfire; however, the approved Development Plan did include Permit Conditions relating to coordination with the County Fire Department, Megapack installation and design, operation and safety planning, and stormwater drainage (Resolution No. 21-09, Exhibit 2, Permit Conditions no. 36, 37, 40, and 44).

The amended Project would be located in the same location as the approved Project, thus the amended Project would not located on moderate or steep slopes, in an area with highly flammable vegetation, in an area without adequate water supplies, or an area with difficult or constrained access. In addition, the amended Project would not result in the installation of, or require increased maintenance of, roads, fuel breaks, or power lines in an area that has an existing high wildfire risk. The installation of augmentation units would also not exacerbate risks that would expose on-site employees to pollutants or uncontrolled wildfires more than what was analyzed in the 2021 Project IS/MND. Therefore, the amended Project would not result in new significant impacts or a substantial increase in the severity of impacts over those identified and evaluated in the 2021 Project IS/MND related to wildfire.

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SECTION 4
Conclusion

On the basis of the evaluation presented in Section 3, the amended Project would not trigger any of the conditions listed in Section 1.3 of this Addendum requiring preparation of a subsequent or supplemental MND. All applicable mitigation measures and permit conditions from the 2021 Project IS/MND would apply to the installation of the augmentation units under the amended Project, as described previously throughout Section 3, *Analysis of Potential Environmental Effects*. This Addendum satisfies the requirements of CEQA Guidelines Sections 15162 and 15164. Under CEQA, modifications that are not substantial, but represent minor changes or additions may be presented in an addendum, which does not require circulation. This document will be made part of the administrative record and will be transmitted to the lead agency decision-making body along with the certified 2021 Project IS/MND, as amended to provide clarification regarding proposed augmentation units outlined above and to comply with CEQA Guidelines Section 15164.

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SECTION 5
List of Preparers

5.1 Lead Agency

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Savannah Battista, M.S.	Deputy Project Manager; Introduction, Project Description, Intro to Environmental Analysis, Aesthetics, Air Quality, Energy, Geology and Soils, Greenhouse Gas Emissions, Mineral Resources, Utilities and Service Systems, Wildfire, Conclusion, Appendices; Senior Reviewer: Agriculture and Forestry Resources, Land Use and Planning, Population and Housing, Public Services, Recreation
Matthew Fagundes	Senior Reviewer: Air Quality, Energy, Greenhouse Gas Emissions, Noise
Ryan Carew	Agriculture and Forestry Resources, Biological Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Population and Housing, Public Services, Recreation
Heidi Koenig, RPA	Cultural Resources and Tribal Cultural Resources
Michael Burns, C.H.G, C.E.G, P.G.	Senior Reviewer: Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Wildfire
Marisol Guzman	Noise and Vibration, Transportation

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