

1. MITIGATED NEGATIVE DECLARATION

1.1. Project Information

Project:	Greenbark 30 Battery Energy Storage Project
Project Location	Within a 2.1-acre undeveloped site at the northern terminus of Viajero Drive, adjacent to the existing Ellwood Generating Station in the western portion of the City of Goleta, Santa Barbara County, California.
Project Sponsor:	Scale Microgrids Solutions Operating, LLC (Scale Microgrids, LLC) 51-53 S Broad Street Ridgewood, NJ 07450
General Plan:	The Project site currently has a General Plan Land Use Designation as General Commercial (C-G). The Applicant is requesting a General Plan Amendment to Office and Institutional (I-OI).
Zoning:	The Project site is currently zoned as General Commercial (CG). The Applicant is requesting a rezone of the parcel to Office Institutional (OI).

1.2. Introduction

Pursuant to the California Environmental Quality Act (CEQA), the City of Goleta (City) must prepare an Initial Study (IS) for the proposed Project to determine if any significant adverse effects on the environment would result from project implementation. The IS utilizes the significance criteria outlined in Appendix G of the CEQA *Guidelines*. If the IS for the project indicates that a significant adverse impact could occur, the City would be required to prepare an Environmental Impact Report.

According to Article 6 (Negative Declaration Process) and Section 15070 (Decision to Prepare a Negative Declaration or Mitigated Negative Declaration) of the CEQA Guidelines, a public agency shall pre-prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

- (a) *The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or*
- (b) *The initial study identifies potentially significant effects, but:*
 - (1) *Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*
 - (2) *There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.*

Based on the analysis in the Initial Study, it has been determined that all project-related environmental impacts could be reduced to a less than significant level with the incorporation of feasible mitigation measures. Therefore, adoption of a Mitigated Negative Declaration (MND) will satisfy the requirements of CEQA. The mitigation measures included in this MND are designed to reduce or eliminate the potentially significant environmental impacts described in the Initial Study. Where a measure described in this document has been previously incorporated into the project, either as a specific project design feature or as an Applicant-Proposed Measure, this is noted in the discussion. Mitigation measures are structured in accordance with the criteria in Section 15370 of the CEQA *Guidelines*.

1.3. Project Description

The proposed Greenbark 30 Battery Energy Storage Project, proposed by Scale Microgrids, LLC (Applicant), would be a battery energy storage system (BESS) with an output power of 30-megawatts (MW) and a storage capacity of 120-megawatt hours (MWh). The development footprint would be within the central portion of the 2.1-acre Project site parcel, within an interior perimeter road. The BESS operational area would consist of the interior perimeter road, BESS equipment, and a perimeter fence.

The Greenbark 30 Battery Energy Storage Project would be located within a 2.1-acre vacant undeveloped site located at the northern terminus of Viajero Drive in western Goleta, California in Santa Barbara County. The property is adjacent to the existing Ellwood Generating Station (EGS) and is accessed from the northern terminus of Viajero Drive, approximately one-quarter mile north of Hollister Avenue.

Battery energy storage units would be charged from the electrical grid and would discharge as a California Independent System Operator (CAISO) market participant. An interconnection application was approved by Southern California Edison (SCE) and BESS interconnection studies are underway. It is anticipated that the BESS would interconnect to the existing SCE 66-kilovolt electrical transmission line along Las Armas Road.

1.4. Environmental Determination

The Initial Study was prepared to identify the potential environmental effects resulting from proposed Project implementation, and to evaluate the level of significance of these effects. The Initial Study relies on information from Scale Microgrids, LLC, their consultant, ERM, and associated submittals, site visits, and additional research.

1.5. Mitigation Measures

Implementation of the following mitigation measures would avoid potentially significant impacts identified in the Initial Study or reduce them to less than significant levels.

Mitigation Measures for Special-Status Animal Species

MM BIO-1 **Worker Environmental Awareness Training.** Prior to the initiation of BESS construction, a Worker's Environmental Awareness Program will be prepared and implemented. For this training, a qualified biologist will:

- Provide environmental training materials that include all relevant permit conditions, avoidance and minimization measures, identification of sensitive biological resources, and legal repercussions of environmental damage.
- Conduct a pre-construction meeting with work crews to review environmental training materials. Personnel will review the protective measures from the relevant permits. New crew members brought on during the Project will receive the same level of training.
- Copies of the permits and educational information will be distributed to personnel to be available at the work site.

MM BIO-2 **Invasive Species Control.** The Environmental Awareness training will include identification of common invasive species known to the local area, inspection procedures, and removal methodologies. Invasive species inspections and maintenance will be incorporated into Operation and Maintenance documentation for the Project.

MM BIO-3 Special Status Wildlife Avoidance.

- Within 3 days prior to initial clearing and grubbing of vegetation, a qualified biologist will conduct a pre-construction survey for special-status wildlife species, including the Western red bat. Should special-status species be observed, they will be monitored as grading and clearing progresses to confirm that they safely move out of the area.
- To protect potential red bat roosting habitat, pre-construction surveys will be conducted by a qualified biologist to identify suitable roost trees, particularly large mature trees with exfoliating bark or dense foliage. If active roosts are identified, a no-disturbance buffer of at least 100 feet will be established around the roost site, and work within this buffer will be postponed until the bats have naturally vacated the area. Vegetation removal will be scheduled outside of the bat maternity season (typically April 1 to August 31) to avoid disturbing maternal colonies.
- Trenches will be covered overnight, or a ramp will be provided at one end for wildlife to escape.

MM BIO-4 Crotch's Bumble Bee. Consistent with CDFW's 2023 guidance (Survey Considerations for CESA Candidate Bumble Bee Species), three visual survey passes for foraging and nesting Crotch bumble bee will be conducted by a qualified biologist during the Colony Active Period (April to August) preceding the initiation of construction. The survey passes will be separated by no less than 2 weeks and no more than 4 weeks. Survey passes will take place during the day (at least 1 hour after sunrise and 2 hours before sunset) on warm (65-90 degrees Fahrenheit), sunny days with low wind (less than 8 miles per hour). Survey results, including negative findings, will be submitted to the City. If survey results are negative, no further actions are required. Should Crotch bumblebee nests/colonies be detected within the Parcel during surveys, an avoidance plan will be developed, if feasible, in consultation with the City and in coordination with CDFW. No construction permits will be issued until the plan has been approved by the City and no further actions are required. If avoidance is infeasible, the Project proponent will initiate consultation with CDFW. No construction permits will be issued until a 2081 Incidental Take Permit is issued or CDFW provides written concurrence that a 2081 Incidental Take Permit is unnecessary.

Mitigation Measure for State or Federally Protected Wetlands

MM BIO-5 Fugitive Dust Control and Stormwater Protection. To minimize fugitive dust emissions and protect stormwater quality during construction, a combination of targeted design elements and operational practices will be implemented. Stabilized construction entrances using gravel pads will be installed at all access points to reduce sediment track-out, which can lower offsite dust transport by up to 80%. A water application system, including water trucks will be used to maintain soil moisture on disturbed surfaces, reducing airborne dust by up to 90% during active grading. Wind breaks such as temporary fencing or vegetative buffers will be placed strategically to reduce wind velocity and dust dispersion by 30–50%. Soil stockpiles will be covered with tarps and surrounded by silt fencing to prevent erosion and reduce dust emissions by over 95%. To maintain stormwater quality and hydraulic function, erosion and sediment control BMPs—including fiber rolls, check dams, and inlet protection—will be installed to prevent sediment-laden runoff while preserving flow conveyance. Daily inspections and adaptive management will ensure the effectiveness of these measures and compliance with regulatory requirements

Mitigation Measure for Nesting Birds

MM BIO-7 Nesting Bird Avoidance. Removal of vegetation between 1 March and 15 September will be avoided to the extent feasible. Should vegetation removal be required on the Project site between 1 March and 15 September, a qualified biologist will conduct nesting bird surveys no more than 7 days prior to vegetation removal. If pre-construction surveys detect an active nest, no vegetation clearing, grading, construction, or other development activity will be permitted within 100 feet of the nest site (300 feet for raptors) during the nesting and fledging season to the extent feasible.

Mitigation Measures for impacts to unknown Cultural Resources

MM C-1 Cultural Resources Awareness Training. Prior to the initiation of construction, all construction personnel shall be trained by an archaeologist qualified under 36 Code of Federal Regulations⁶¹ regarding the recognition of possible buried cultural resources (i.e., Native American and/or historical artifacts, objects, or features) and protection of all archaeological resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural materials. All personnel shall be instructed that unauthorized removal or collection of artifacts is a violation of state law. Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Workers' Environmental Awareness Program, so they are aware of the potential for inadvertently exposing buried archaeological deposits.

MM C-2 Inadvertent Discovery of Historical Resources, Unique Archaeological Resources, or Tribal Cultural Resources. If previously unidentified cultural resources are uncovered during construction activities, construction work within 50 feet of the find shall be halted and directed away from the discovery until an archaeologist qualified by the Secretary of the Interior assesses the significance of the resource, in consultation with consulting Tribe(s), and makes a recommendation to the City of Goleta.

The archaeologist, in consultation with the City of Goleta, consulting Tribe(s), and any other responsible public agency, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts if the find(s) is found to be eligible to the California Register, local register or qualify as a unique archaeological resource or a TCR under CEQA (PRC §21083.2).

MM C-3 Treatment of Human Remains. Any human remains discovered in the Project site are to be treated with respect and dignity. Per Public Resources Code Section 5097.98(b), upon discovery of human remains, the following must occur: all work within 50 feet of the discovery area must cease immediately, nothing in the Project site is to be disturbed, and the area must be secured.

Per Health and Safety Code section 7050.5, the County Coroner's Office must be called in the event of an inadvertent discovery of human remains. The Coroner has two working days to examine the remains after notification. The appropriate land manager/owner of the site is to be called and informed of the discovery. It is very important that the suspected remains, and the area around them, are undisturbed and the proper authorities called to the scene as soon as possible, because it could be a crime scene. The Coroner would determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions. After the Coroner has determined that the remains are archaeological/historic-era, the Coroner would make recommendations concerning the treatment and disposition of the remains to the person responsible for

the excavation, or to his or her authorized representative. If the Coroner believes the remains to be those of a Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) by telephone within 24 hours.

Per Public Resources Code section 5097.98, the NAHC would immediately notify the person it believes to be the most likely descendant (MLD) of the remains. The MLD has 48 hours from the time given to access the site to make recommendations to the landowner for treatment or disposition of the human remains. If the descendant does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the descendant's recommendations, the owner or the descendant may request mediation by NAHC.

According to the California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and willful disturbance of human remains is a felony (Section 7052).

Mitigation Measure for Geology and Soils

MM GEO-1 Inadvertent Discovery of Unique Paleontological Resources or Geologic Features. If previously unidentified paleontological resources or geologic features are uncovered during construction activities, construction work within 50 feet of the find shall be halted and directed away from the discovery until a qualified paleontologist or geologist assesses the significance of the resource. The paleontologist or geologist, in consultation with the City of Goleta, and any other responsible public agency, shall make the necessary plans for treatment of the find(s) and for the evaluation and mitigation of impacts.

Mitigation Measure for Hazards and Hazardous Materials

MM HM-1 Hazardous Substance Control and Emergency Response. Scale Microgrids, LLC shall implement its Emergency Response Plan and Site Safety Plan procedures as needed. These procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of Project construction, operation, and decommissioning. They address worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on site. If it is necessary to store chemicals on site, they shall be managed in accordance with all applicable regulations. Material safety data sheets shall be maintained and kept available on site, as applicable.

No known soil contamination was identified within the Project site. However, historic groundwater contamination has occurred at upgradient sites (SWRCB, 2025). In the event that soils, or groundwater suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed/encountered during site grading or excavation activities or dewatering activities, the excavated soil and/or extracted groundwater shall be tested and, if contaminated above hazardous waste levels, shall be contained and either treated or disposed of at a licensed waste facility. The presence of known or suspected contaminated soil or groundwater shall require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.

All hazardous materials and hazardous wastes shall be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous

materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following:

- Proper disposal of potentially contaminated soils.
- Stopping work at that location and contacting the Santa Barbara Fire Department Hazardous Materials Response Team immediately if visual contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the Hazardous Materials Division.
- Develop an Emergency Operations Plan with emergency response and reporting procedures to address hazardous material spills. The Emergency Operations Plan shall also be developed in compliance with sections of NFPA 855, including:
 - procedures for safe shutdown, de-energizing and isolation of equipment under emergency situations;
 - procedures for inspection and testing of alarms, interlocks, detection systems and controls including recordkeeping;
 - procedures to be followed in response to notification from the storage systems that could signify dangerous situations, including shutting down equipment and notification to the local fire department; and procedures and schedules for conducting drills of the procedures.
- Develop a Site Safety Plan prior to commencement of construction that identifies and summarizes the design safety features and equipment onsite, including the following:
 - Fire prevention, detection, and suppression features, including:
 - (i) a description of the Battery Management System (BMS) and the monitoring of alarms and battery cell conditions and thresholds for alarms. Monitoring and detection systems shall alarm locally and both visually and audibly, shall be monitored by a 24-hour system and shall notify the local fire department. Indication shall be provided to responders indicating which Megapack is experiencing issues;
 - (ii) flame and gas detection systems, including the location of detection, type of detection and the monitoring of alarms (NFPA 855 Section 4.8);
 - (iii) availability of water for firefighting and compliance with fire department requirements for flow and availability (NFPA 855 Section 4.9).
 - Special safety measures to be implemented for battery installation and replacement, including:
 - (i) all batteries shall be discharged to below 30 percent state of charge (SOC) during the construction/installation phases.
 - (ii) 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 percent SOC and nearby batteries that could be affected shall also be discharged to below 30 percent SOC;
 - (iii) disposal of replaced (discarded) equipment.

- Provide a copy of an NFPA 855 compliance audit report to verify that the system is designed and built to comply with the NFPA 855 requirements prior to system startup;
- Provide documentation indicating that batteries are listed in accordance with UL 1973 and listed in accordance with UL 9540;
- Ensure that Megapack batteries are located at least 10 feet from lot lines as per NFPA 855;
- Vehicle impact protections or equivalent that meets the standard outlined in NFPA 855 section 4.7.5.3 shall be installed to reduce the potential for vehicle impacts (as per NFPA 855 section 4.7.5.2);
- Emergency response procedures, including notification of local responders;
- Personnel safety training;
- Fire suppression and other safety features/equipment located at the site;
- Site-specific buffers for construction vehicles and equipment located near sensitive resources;
- Type and placement of warning signs;
- Emergency ingress and egress routes;
- Provisions and timing for updating the Plan to incorporate new or changed requirements;
- Control of vegetation;
- Security of installations;
- Access roads design;
- Signage; and
- Remediation measures including authorized service personnel and fire mitigation personnel.

Mitigation Measures for Construction Traffic

MM T-1 Construction Traffic Control Plan. Prior to the start of construction, Scale Microgrids, LLC shall prepare and submit a Construction Traffic Control Plan for review and approval to the City of Goleta (City) Planning Department for public roads and transportation facilities that would be directly affected by the construction activities and/or would require permits and approvals. Scale Microgrids, LLC shall submit the Construction Traffic Control Plan to the City prior to construction. The Construction Traffic Control Plan shall include, but not be limited to:

- Identification of any routes that would require lane closures or detours to accommodate material and equipment deliveries and methods to ensure safety.
- Avoidance of peak travel hours (8:00-10:00 a.m. and 4:00-6:00 p.m.) to the maximum extent feasible.
- Plans to coordinate in advance with emergency service providers to avoid restricting the movements of emergency vehicles. Police departments and fire departments shall

be notified in advance by Scale Microgrids, LLC of the proposed locations, nature, timing, and duration of any roadway disruptions, and shall be advised of any access restrictions that could impact their effectiveness. At locations where roads will be blocked, provisions shall be ready at all times to accommodate emergency vehicles.

- Plans to coordinate in advance with property owners, if any, that may have limited access to properties.

Mitigation Measure for Cumulative Noise Impacts

MM NOI-CUM-1 Concurrent Construction Coordination Plan. Prior to any ground-disturbing activities, the Project Applicant shall coordinate with the adjacent project proponent(s) to identify overlapping construction periods. If concurrent activities are scheduled within 500 feet of a shared property line, the applicants shall develop a construction noise reduction plan in consultation with the City. The plan may include but is not limited to: staggered work schedules, use of quieter equipment, temporary sound barriers, and notification to nearby sensitive receptors.

1.5.1. Conditions of Approval

The following conditions of approval are recommended to ensure compliance with various rules and regulations, and to reduce impacts to a less than significant level.

AES1. Recommended Condition of Approval: Design Review. Prior to the issuance of building permits, the Applicant/Permittee must secure Design Review Board (DRB) final approval of the site plan, architectural style, colors and materials of the project that ensure compatibility of massing, heights, landscaping, lighting, and architectural consistency with the existing neighborhood character.

Timing: Before applying for building permits, the Applicant/Permittee must apply for design approval from the DRB and submit plans wherein the massing, height, landscaping, lighting, and architectural style of all proposed energy storage project equipment is consistent with neighborhood land uses and buildings and do not detract from existing neighborhood character.

Monitoring/Reporting Party(ies): The Planning and Environmental Review Director, or designee, must conduct a final review of the final plans before the City issues a grading permit. If the final plans are not in substantial conformance with the approved plans, the Planning and Environmental Review Director may refer the matter back to the full DRB for a final determination. The Applicant/Permittee shall also demonstrate to PER compliance monitoring staff that the project has been built consistent with approved DRB design and landscape plans prior to Final Building Inspection Clearance.

AES2. Recommended Condition of Approval: Lighting Specifications. Any exterior lighting installed on the project site must be consistent with the City of Goleta's outdoor lighting standards (consistent with General Plan Policy VH 4.12, and City of Goleta Code of Ordinances Chapter 17.35, as listed below:

- (a) low intensity;
- (b) low glare design;
- (c) be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels;
- (d) otherwise meet dark sky requirements.

Exterior lighting fixtures must be kept to the minimum lighting level and intensity needed to ensure public safety. These lights must be dimmed after 11 PM to the maximum extent practical without compromising public safety as determined by the Planning and Environmental Review Director. Lighting fixtures must be appropriate for the architectural style of the structure and surrounding area. The final lighting plan must

be amended to include identification of all types, sizes, and intensities of wall mounted building lights and landscape accent lighting and a photometric map must be provided. "Moonlighting" type fixtures that illuminate entire tree canopies should also be avoided.

GEO1. Recommended Condition of Approval: Geotechnical Recommendations. All grading and earth-work recommendations from the project's geotechnical engineering report, including any updates, shall be incorporated into the final project design, including the final grading, foundation, utility, and infrastructure plans. All grading activities shall be supervised by a registered civil engineer or certified engineering geologist.

Plan Requirements and Timing: Final grading, foundation, utility, and infrastructure plans shall be reviewed and approved by City staff prior to approval of a grading permit.

Monitoring: The Planning and Environmental Review Director, or designee, shall verify compliance prior to any grading permit approval. Public Works staff shall periodically spot check in the field.

GEO2. Recommended Condition of Approval: Stormwater Pollution Prevention Plan (SWPPP) Development and Implementation. Following Project approval, the applicant will prepare and implement a SWPPP to minimize construction impacts on surface water and groundwater quality. Implementation of the SWPPP will help stabilize graded or disturbed areas and reduce erosion and sedimentation. The plan will designate BMPs that will be adhered to during construction activities. Erosion and sediment control measures, such as straw wattles, covers, and silt fences, may be installed before the onset of winter rains or any anticipated storm events if soils are not stabilized. Suitable stabilization measures will be used to protect exposed areas during construction activities, as necessary. During construction activities measures will be in place to prevent contaminant discharge.

The Project SWPPP will include erosion control and sediment transport BMPs to be used during construction. BMPs, where applicable, will be designed by using specific criteria from recognized BMP design guidance manuals. Erosion-minimizing efforts may include measures such as properly containing stockpiled soils.

Erosion control measures identified will be installed in an area before construction begins during the wet season and before the onset of winter rains or any anticipated storm events. Temporary measures such as silt fences or wattles, intended to minimize sediment transport from temporarily disturbed areas, will remain in place until disturbed areas have stabilized. The plan will be updated during construction as required by the SWRCB.

A worker education program shall be established for all field personnel prior to initiating fieldwork to provide training in the appropriate application and construction of erosion and sediment control measures contained in the SWPPP. This education program will also discuss appropriate hazardous materials management and spill response. Compliance with these requirements will be ensured by the on-site construction contractor.

N1. Recommended Condition of Approval: Construction Timing. Construction activity and equipment maintenance is limited to the hours between 8 AM and 5 PM Monday through Friday. Exceptions to these restrictions may be made for onsite work for good cause at the sole discretion of the Planning and Environmental Review Director. Exceptions to these restrictions for work in the City Right-of-Way may be made for good cause at the sole discretion of the Public Works Director or designee. Any subsequent amendment to the General Plan noise standard upon which these construction hours are based shall supersede the hours stated herein. No construction can occur on State holidays (e.g., Thanksgiving, Labor Day). Non-noise generating construction activities such as interior plumbing, electrical, drywall and painting (depending on compressor noise levels), are not subject to these restrictions.

Timing: At least one sign near each project site entrance stating these restrictions must be posted on the site. Signs must be a minimum size of 24" x 48." Signs must be in place before the beginning of and throughout grading and construction activities. Violations may result in suspension of permits.

Monitoring/Reporting Party(ies): The Planning and Environmental Review Director must monitor compliance with restrictions on construction hours and must promptly investigate and respond to all complaints.

N2. Recommended Condition of Approval: Noise Complaints. Upon receipt of a verified noise complaint regarding nuisance noise from the project site, the City will require the following:

- (a) The project operator shall conduct a noise survey of the project site conducted by a City-approved noise consultant.
- (b) The project operator shall have a report prepared by a City-approved noise consultant that describes the primary noise sources identified during the survey.
- (c) The noise report shall evaluate the broadband noise level and octave band data obtained by the survey; and determine if there is an audible tone or set of tones or an exceedance of the noise requirements of Zoning Ordinance Section 17.39.070.
- (d) If an exceedance or audible tones are identified, additional noise measurements shall be required to identify the noise source of concern and develop measures to reduce noise levels generated by the fans.
- (e) Noise reduction measures may include, but are not limited to: the use of alternate fan settings, fan speeds, fan blade angle, or even passive barriers. Barriers can be located at ground level and surround the site, or be located along a property line. If specific equipment is the primary source, then the barriers can be located adjacent to the equipment, or placed on the equipment, such as on top of the MegaPack. At minimum, the noise attenuation barriers must have a weight of two pounds per square foot or greater. This can include, but is not limited to 18-gauge steel sheet, 5/32 glass panels, and 5/8-inch-thick plywood. In addition, the barrier must be solid with no holes, gaps, or perforations and well-sealed to the surface to which it is attached.

Monitoring/Reporting Party(ies): The Planning and Environmental Review Director must promptly respond to all project-related nuisance noise complaints, require the project operator to implement the required noise surveys described above, and monitor compliance with noise complaint resolution measures.

1.5.2. Mitigation Monitoring Plan

A Mitigation Monitoring Plan (see Section 6) has been prepared to ensure that the mitigation measures presented above are properly implemented. The plan describes specific actions required to implement each measure, including information on timing of implementation and monitoring requirements.

Based on the analysis and conclusions of the Initial Study, the impacts of the Project as proposed by Scale Microgrids, LLC, would be mitigated to less than significant levels with the implementation of the mitigation measures presented herein, which have been incorporated into the proposed Project.