

6. MITIGATION MONITORING PLAN

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the City of Goleta and the Applicant to ensure that the mitigation measures adopted as a condition of project approval are implemented. The MMRP is consistent with CEQA Guidelines (Sections 15074(d), 15091(d), and 15097) for the implementation of mitigation.

The City of Goleta is the CEQA Lead Agency. In that role, if the proposed Project is approved, the City is responsible for ensuring that monitoring and reporting on required mitigation occurs. As the Applicant and Project proponent, Scale Microgrids, LLC would be responsible for implementing all applicable measures, including adopted mitigation measures and conditions of project approval, as well as conditions imposed in any permits or regulations administered by other responsible agencies. Additionally, the City will be responsible for ensuring that construction personnel understand their responsibility to adhere to the MMRP requirements and other contractual requirements related to the implementation of mitigation.

Table 6-1. Mitigation Monitoring Plan

Impact Category	Mitigation Measure	Monitoring Requirement	Timing of Action
Biological Resources			
Impacts to Special-Status Species	<p>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:</p> <ul style="list-style-type: none"> ■ 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. 	Applicant to implement training program.	Prior to and during construction.
	<p>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.</p>	Applicant to implement training program.	Prior to, during construction, and after construction.
	<p>MM BIO-3 Special Status Wildlife Avoidance.</p> <ul style="list-style-type: none"> ■ 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. 	Conduct clearance surveys.	Prior to any vegetation removal or ground disturbing activities during construction.
Impacts to Crotch’s Bumble Bee	<p>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</p>	Conduct clearance surveys.	Prior to any vegetation removal or ground disturbing activities during construction.

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	<p>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.</p>		
<p>Impacts to State or Federally Protected Wetlands</p>	<p>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.</p>	<p>Applicant to implement best management practices to avoid fugitive dust and maintain water quality.</p>	<p>Prior to construction.</p>
<p>Impacts to Nesting Birds</p>	<p>MM BIO-6 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.</p>	<p>Applicant to conduct pre-construction surveys and avoid removal of vegetation during nesting bird season.</p>	<p>Prior to and during construction.</p>
Cultural Resources			
<p>Impacts to unknown buried Cultural Resources</p>	<p>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.</p>	<p>Applicant to implement training program.</p>	<p>Prior to and during construction.</p>
	<p>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</p>	<p>Applicant to report discovery to qualified archaeologist and City, and</p>	<p>During construction.</p>

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	<p>Interior assesses the significance of the resource, in consultation with consulting Tribe(s), and makes a recommendation to the City of Goleta.</p> <p>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).</p>	<p>consulting Tribe(s) as needed.</p>	
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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).</p>	<p>Applicant to report discovery to County Coroner’s Office.</p>	<p>During construction.</p>
Geology and Soils			
<p>Impacts to geology and soils</p>	<p>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</p>	<p>Applicant to report unidentified paleontological resources or geologic features to qualified paleontologist and City.</p>	<p>During construction.</p>

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	<p>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.</p>		
Hazards and Hazardous Materials			
<p>Accidental Release of Hazardous Materials</p>	<p>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.</p> <p>No known soil contamination was identified within the Project site. However, historic ground-water 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:</p> <ul style="list-style-type: none"> ■ 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: <ul style="list-style-type: none"> ● 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. 	<p>Applicant to develop and implement its Emergency Response Plan and Site Safety Plan.</p>	<p>Prior to and during construction.</p>

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	<ul style="list-style-type: none"> ■ Develop a Site Safety Plan prior to commencement of construction that identifies and summarizes the design safety features and equipment onsite, including the following: <ul style="list-style-type: none"> ● Fire prevention, detection, and suppression features, including: <ol style="list-style-type: none"> i. a description of the 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: <ol style="list-style-type: none"> 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. 		

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Transportation and Traffic			
Construction Traffic	<p>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:</p> <ul style="list-style-type: none"> ■ 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. 	Applicant to prepare Construction Traffic Control Plan for review and approval by the City.	Prior to and during construction.
Mandatory Findings of Significance (Cumulative Impacts)			
Construction Noise	<p>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.</p>	Applicant to implement noise reduction plan, which includes use of quieter equipment and sound barriers, and provide advanced notification.	Prior to and during construction.