Attachment 15

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July 8, 2021
Project No: 19-08526

Goleta Energy Storage, LLC
c/o: Peter Ledig
8614 Westwood Center Drive, Suite 1800
Vienna, Virginia 22182

Subject: **Biological Technical Report Addendum for the Goleta Energy Storage Project, Goleta, California**

Dear Mr. Ledig,

Rincon Consultants, Inc. (Rincon) prepared this addendum to the Biological Resources Assessment (BRA) dated March 30, 2020 (Rincon 2020) for the Goleta Energy Storage Project (Project) in Goleta, California. The Project includes construction and operation of a battery energy storage system (BESS). The purpose of this report is to address the additional project components proposed for the Project and the potential for sensitive biological resources to occur or be affected by construction in these areas. The "project area" referenced herein comprises the additional areas that were not included in the BRA. Project impacts, relevant regulations, and proposed mitigation measures are discussed in the context of the Environmental Checklist Form in Appendix G of the State CEQA Guidelines.

Project Description

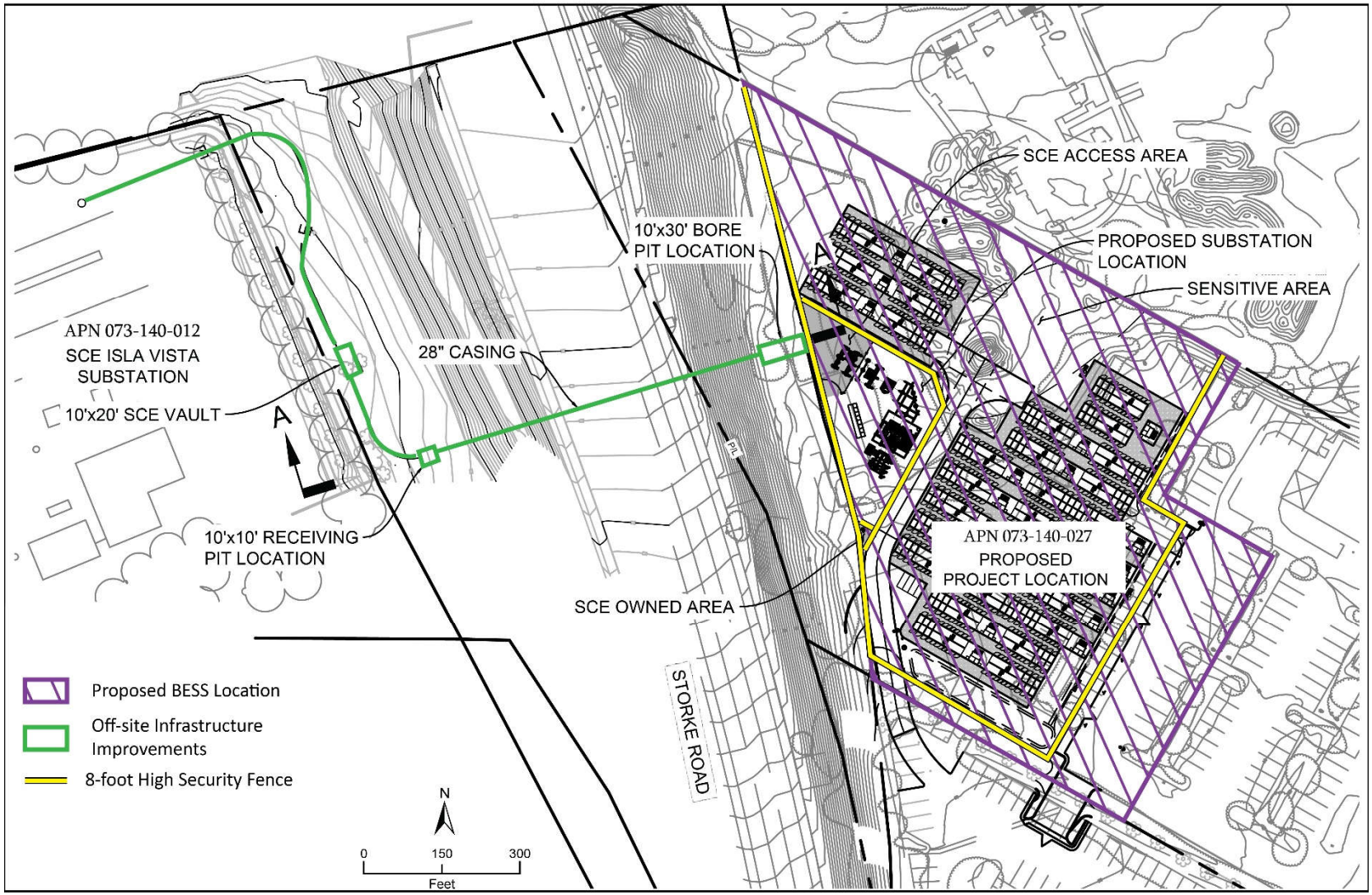
The project area is located west of Storke Road and south of U.S. Highway 101, adjacent to the Southern California Edison (SCE) Isla Vista Substation (IV Substation). The additional project components include:

- An underground electrical line in 28-inch casing beneath Storke road connecting the proposed BESS to the existing IV Substation, a bore pit, a receiving pit, and a 10x20-foot vault (Figure 1);
- A graded permanent hammerhead turnaround (approximately 2,400 square feet), crushed rock-covered dirt ramp, asphalt access road, riser, swing gate, and pipe culvert located within the "Project Boundary" shown in Figure 2 and detailed in Attachment A – SCE Substation Improvements Site Plan; and
- Two diverse underground telecom paths with one 4x4-foot pull box each located inside the IV Substation between the 10x20-foot vault and an existing mechanical electrical equipment room (MEER).

Methodology

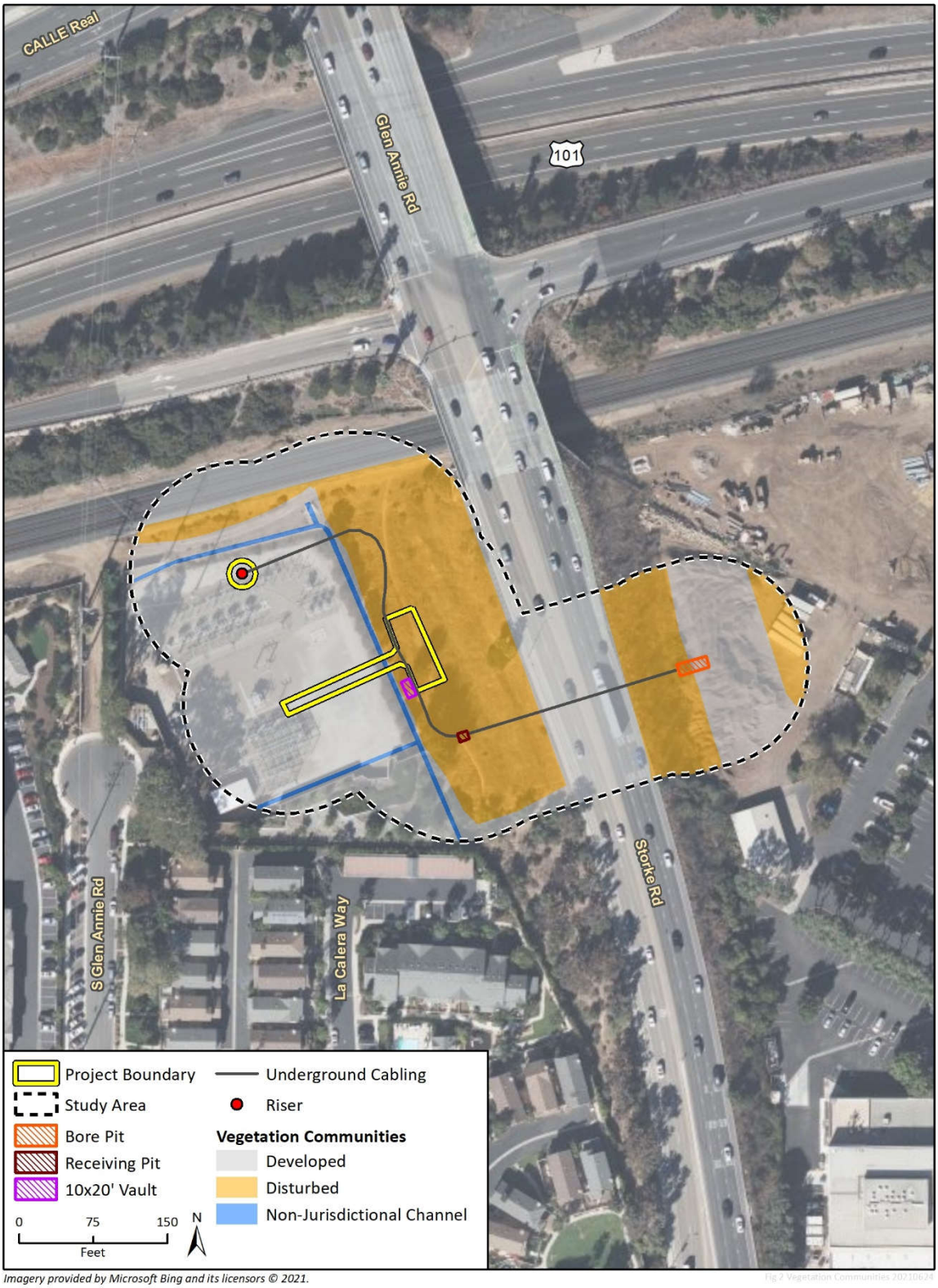
A Rincon biologist reviewed the BRA, project plans (provided by the project proponent), aerial photographs, and previous historical land use of the biological study area as well as the USFWS National Wetland Inventory (NWI) Mapper (USFWS 2021) and the National Hydrography Dataset (NHD) via the Stream Classification Finder (State Water Resources Control Board; SWRCB 2021) to obtain information regarding the potential for sensitive biological resources to occur within the project area.

Figure 1 Off-Site SCE Improvements



Source: Flowers & Associates, Inc., 2021.

Figure 2 SCE IV Substation Improvements, Vegetation/Land Cover, and Non-Jurisdictional Drainage



Imagery provided by Microsoft Bing and its licensors © 2021.

A field reconnaissance survey was conducted by Rincon biologist Kendra Bonsall on June 18, 2021 to document the existing site conditions and to evaluate the potential presence of sensitive biological resources within the project area, including special-status plant and animal species, sensitive plant communities, potentially jurisdictional wetlands and waters of the U.S. and State, and habitat for federally and state protected species. The "study area" for this assessment included the project area plus a 100-foot buffer in all directions (Figure 2).

Weather conditions during the survey included an average temperature of approximately 63 degrees Fahrenheit, calm winds up to 5 miles per hour, and overcast skies with good visibility. Accessible portions of the biological study area were surveyed on foot and inaccessible areas were observed remotely with 10x30 binoculars. Most of the biological study area overlaps with the study area assessed in the BRA (Rincon 2020).

An aquatic resources delineation was conducted for potential wetland and non-wetland aquatic resources. Current methods, guidelines, and policies were used to identify and delineate potential federal, state, and local-jurisdictional features that may be under the jurisdiction of the USACE CDFW, Central Coast Regional Water Quality Control Board (CCRWQCB) within the biological study area. The biological study area was surveyed for any streams and other hydrologic features that might constitute Waters of the U.S. or Waters of the State, including those having a defined channel, bed, banks, and any associated riparian habitat that could be subject to CDFW jurisdiction.

Existing Conditions

Soils

The biological study area contains four mapped soil types: Goleta fine sandy loam, Xerorthents (cut and fill areas), Milpitas-Positas fine sandy loams, and Milpitas-Positas fine sandy loams (eroded) (NRCS 2020). These soil types are not listed as hydric soils (NRCS 2020b). Milpitas-Positas fine sandy loams (eroded) and Xerorthents (cut and fill areas) are the only soil types present in the project site. Portions of the biological study area mapped as Milpitas-Positas fine sandy loams (eroded) and Xerorthents are entirely developed or paved with asphalt.

Vegetation

The vegetation classification used for this analysis is based on Sawyer et al. (2009) but was modified as needed to accurately describe the existing vegetation communities based on species dominance. The conditions within the biological study area consist of developed and disturbed areas (Figure 2). A total of nine plant species were identified in the biological study area during the survey (Table 1), of which seven were weedy and/or non-native species.

Developed land includes areas that have been developed by permanent or semi-permanent structures, pavement or hardscape, and ornamental landscaping. The IV Substation is entirely developed with a gravel base and bordered by Storke Road, a railroad, U.S. Highway 101, and developed residential neighborhoods.

Disturbed habitats have been physically impacted by previous human activities (e.g., grading). Disturbed habitats are not recognizable as a native or naturalized vegetation association but continue to retain a soil substrate. Vegetation in disturbed areas, if present, is typically composed of ruderal exotic species that take advantage of disturbance and can impede the growth of native plants. Disturbed vegetation is

present between the IV Substation and Storke Road in the study area and on the adjacent slope west of Storke Road. The plants observed in the study area were primarily weedy/non-native species, including black mustard (*Brassica nigra*), annual grasses (*Bromus* sp.), and gum (*Eucalyptus* sp.) trees, with sporadic individual coyote brush (*Baccharis pilularis*) shrubs.

Table 1 Plant Species Observed During June 18, 2021 Field Reconnaissance Survey

Scientific Name	Common Name	Native or Non-Native?
Avena sp.	wild oat	Non-Native
Baccharis pilularis	coyote brush	Native
Brassica nigra	black mustard	Non-native
Bromus sp.	annual grasses	Non-native
Eucalyptus sp.	eucalyptus	Non-native
Foeniculum vulgare	fennel	Non-native
Heteromeles arbutifolia	toyon	Native
Ricinus communis	castor bean	Non-native
Washingtonia robusta	Mexican fan palm	Non-native

Wildlife

The biological study area provides relatively little suitable habitat for wildlife species due to its developed/disturbed nature and the lack of native vegetation and surrounding development (Storke Road to the east, Highway 101 and a railroad to the north, the IV Substation to the west, and residential homes to the south). Avian species observed in the biological study area during the survey included common species such as California towhee (*Melozone crissalis*), Eurasian-collared dove (*Streptopelia decaocto*), and house finch (*Carpodacus mexicanus*). Wildlife species that commonly occur in urban areas, such as rodents, Virginia opossum (*Didelphis virginiana*) and striped skunk (*Mephitis mephitis*) are likely to occur on-site. No other wildlife species or signs of wildlife such as small mammal burrows were observed.

Sensitive Biological Resources

Special-Status Species

No special-status plant or wildlife species were detected during the June 18, 2021 survey. Furthermore, based on the CNDDB and CNPS queries conducted in the original BRA (Rincon 2020), no special-status plant or wildlife species have a potential to occur in the biological study area due to developed and disturbed condition of the project area and study area and absence of native vegetation or aquatic habitat.

Nesting Birds

Migratory and common resident nesting birds are protected by the California Fish and Game Code (CFGC) Section 3503 and Migratory Bird Treaty Act (MBTA). Native and ornamental trees and shrubs, and man-made structures in the biological study area, could provide habitat for nesting birds. No nests or birds exhibiting nesting behaviors were observed during the survey. However, if project activities occur during the nesting season (typically February 1 through August 31), nesting birds may be

impacted. The potential impact would be reduced below a significant level through implementation of Mitigation Measure BIO-1 described in the BRA.

Sensitive Natural Communities

No sensitive natural communities are present in the biological study area. Although no coast live oak trees are present in the project area, oak trees are present within biological study area, south of the substation. These oak trees appear to have been planted within an area covered in gravel base and are not associated with an intact, native community within associate understory vegetation such as chamise (*Adenostoma fasciculatum*). The oak trees are depicted as developed landcover (Figure 2). As such, the coast live oaks within the study area that are outside of the project area do not constitute a sensitive natural community (CDFW 2019). Therefore, no impact to sensitive natural communities would occur, which is consistent with the conclusion made in the BRA (Rincon 2020).

Jurisdictional Wetlands and Waterways

A formal jurisdictional delineation was conducted for the biological study area and no waters or wetlands were present that might meet the standards for federal protection under jurisdiction of the United States Army Corps of Engineers (USACE), CDFW, or Regional Water Quality Control Board (RWQCB). A non-jurisdictional concrete channel was observed during the field survey on the east side of the IV Substation at the base of the slope adjacent to Storke Road. The channel is manmade with a dry concrete bottom and located in an upland area. There is non-native vegetation growing in portions of the channel and no evidence of standing water was observed during the survey. The channel is not mapped in NWI or NHD, and there are no wetland or riparian vegetation. The channel originates from the northwest and southwest corners within the substation and runs along the north and south sides of the substation. The channel continues south adjacent to residential homes and conveys stormwater runoff from these areas into the municipal storm drain system. The height of the side walls of the channel are less than six inches tall, indicating minor flow volumes. The feature was likely built as part of the substation construction to convey flows away from the structure. Aerial imagery (Google 2021) shows that the channel has been present and concrete since 2007, but prior imagery is difficult to discern due to poor quality. Given these factors, it is reasonable to conclude that the channel is non-jurisdictional, however the regulatory agencies must make the final jurisdictional determination.

The project area would not impact jurisdictional waters or wetlands.

Wildlife Movement

The biological study area is not in an area identified as a wildlife corridor. The potential movement of wildlife through the biological study area is minimal given the entirely developed IV substation and developed areas surrounding project area (including a railroad and Highway 101 to the north, Storke Road to the east, and residential homes to the south). The project area would not impede wildlife movement, and no impacts would occur, which is consistent with the conclusions made in the BRA (Rincon 2020).

Local Policies and Ordinances

Environmentally Sensitive Habitat Areas

No Environmentally Sensitive Habitat Areas (ESHA) identified in Figure 4-1 of the Goleta General Plan/Coastal Land Use Plan (GP/CLUP) are present in the biological study area, and the project would

have no effect on these resources (City 2006). Therefore, the additional project area would not impact to ESHA, which is consistent with the conclusions made in the BRA (Rincon 2020).

Protected Trees

Oak trees protected by the City under the Conservation Element 9 (CE 9) of the Goleta GP/CLUP are present within the study area south of the IV Substation outside of the project area. The project area would not impact protected trees, which is consistent with the conclusions made in the BRA (Rincon 2020).

Habitat Conservation Plans

The biological study area is not subject to any Habitat Conservation Plan, Natural Conservation Community Plan, or other local, regional, or state habitat conservation plan. Therefore, no impacts would occur, which is consistent with the conclusions made in the BRA (Rincon 2020).

Mitigation Measures

No additional mitigation measures are recommended for the additional project components associated with the project area.

Limitations

This document was prepared for use solely and exclusively by Goleta Energy Storage, LLC, care of Peter Ledig, who may use it to provide information to satisfy CEQA requirements. No other use or disclosure is intended or authorized by Rincon, nor shall this report be relied upon or transferred to any other party without the express written consent of Rincon. This work has been performed in accordance with good commercial, customary, and generally accepted biological investigation practices conducted at this time and in this geographic area. The findings and opinions conveyed in this report are based on a suitability analysis level only and did not include definitive surveys for the presence or absence of the special-status species that may be present. Definitive surveys for special-status wildlife and plant species generally require specific survey protocols requiring extensive field survey time to be conducted only at certain times of the year. The findings and opinions conveyed in this report are based on this methodology. It is understood that Rincon is to be held harmless for any inverse condemnation or devaluation of said property that may result if Rincon's report or information generated during our performance of services is used for other purposes.

Thank you for the opportunity to continue to support you on this project. Please contact us if you have any questions.

Sincerely,
Rincon Consultants, Inc.

Yuling Huo
Associate Biologist

Greg Ainsworth
Director

Attachments

Attachment A SCE Substation Improvements Site Plan

Attachment B Site Survey Photographs

References

California Department of Fish and Wildlife. 2019. California Sensitive Natural Communities. Available at: https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities.

Goleta, City of (City). 2006. General Plan. Available at https://www.cityofgoleta.org/city-hall/planning-and-environmental-review/general-plan.

_____. 2019. Goleta Municipal Code, Appx. A Grading Ordinance Guidelines for Native Oak Tree Removal. Available at http://qcode.us/codes/goleta/view.php?topic=15-15_09-appx_a_grading_ordinance_guidelines_for_&frames=on.

Google, LLC. 2021. Google Earth Historical Imagery (2007 to 2021). Accessed June 2021.

Natural Resources Conservation Service. 2021. Web Soil Survey. Available at: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed June 2021.

Rincon Consultants, Inc. 2020. Biological Resource Assessment for the Goleta Energy Storage Project. March 30, 2020.

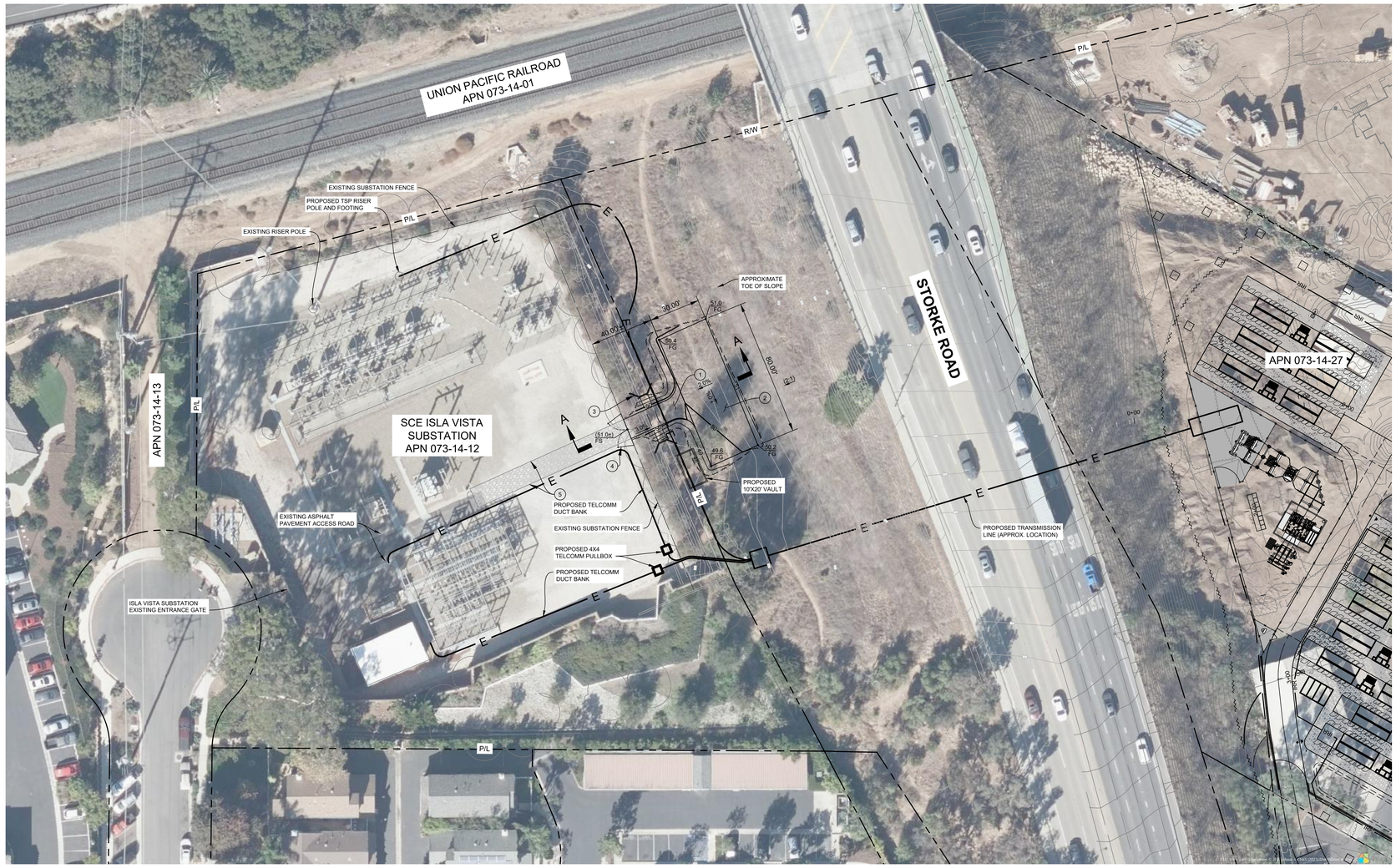
Sawyer, J. O., T. Keeler-Wolf, and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society, Sacramento, California.

State Water Resources Control Board. 2021. Stream Classification Finder. Available online at: https://gispublic.waterboards.ca.gov/portal/apps/View/index.html?appid=9b7f9b80c1904869b0f2a98e1c10f81e. Accessed June 2021.

United States Fish and Wildlife Service. 2021. National Wetland Inventory. Available at: http://www.fws.gov/wetlands/Data/Mapper.html. Accessed June 2021.

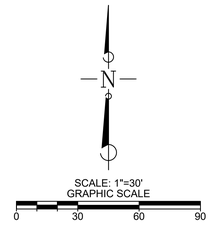
Attachment A

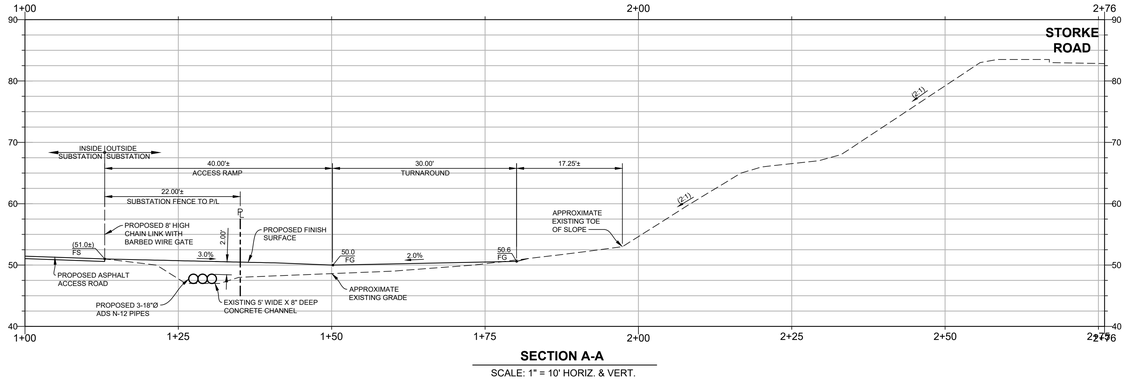
SCE Off-Site Improvements Site Plan



CONSTRUCTION NOTES & QUANTITIES:

1. CONSTRUCT RAMP FROM SUBSTATION PAD TO NEW HAMMERHEAD SURFACE TO BE CRUSHED ROCK (CALTRANS CLASS 2 BASE). APPROX. 40 FT.
2. GRADE TURN AROUND AREA/ CONSTRUCTION PAD (HAMMERHEAD) SURFACE TO BE CRUSHED ROCK (CALTRANS CLASS 2 BASE). APPROX 2,400 SF.
3. INSTALL THREE (3) 18"~ ADS N-12 PIPE CULVERT WITH CONCRETE END WALLS. APPROX. 30 FT.
4. INSTALL 20' WIDE DOUBLE DRIVE SWING GATE (CHAIN LINK W/ BARBED WIRE). 1 EA.
5. PROPOSED ASPHALT ACCESS ROAD INSIDE SUBSTATION. MATCH EXISTING ASPHALT PAVEMENT WIDTH. APPROX. 100 LF.





SECTION A-A
SCALE: 1" = 10' HORIZ. & VERT.

ESTIMATED EARTHWORK QUANTITIES:

CUT: 0 CUBIC YARDS

FILL: 140 CUBIC YARDS

NOTE: SHRINKAGE, CONSOLIDATION AND SUBSIDENCE FACTORS AND LOSSES DUE TO CLEARING AND DEMOLITION OPERATIONS ARE NOT INCLUDED. ESTIMATED EARTHWORK QUANTITIES ARE BASED ON THE APPROXIMATE DIFFERENCE BETWEEN EXISTING GRADES AND PROPOSED FINISH GRADES OR PAVEMENT SUBGRADES, AS INDICATED ON THE PLANS, AND SHOULD VARY ACCORDING TO THESE FACTORS AND LOSSES.

CONTRACTOR SHALL ACCEPT OR CONFIRM EXISTING TOPOGRAPHIC INFORMATION, SHALL REVIEW THE SITE AND THE GEOTECHNICAL REPORT(S) AND MAKE HIS OWN INTERPRETATIONS AND CONCLUSIONS WITH RESPECT THERETO, AND SHALL PERFORM AN INDEPENDENT EARTHWORK ESTIMATE ON WHICH TO BASE HIS BID. ONCE GRADING IS STARTED, THE TOPOGRAPHIC INFORMATION HAS BEEN ACCEPTED BY CONTRACTOR.

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AltaGas / Goleta Energy Storage LLC
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Development Plan / Tentative Parcel Map Drawings for:
Goleta Energy Storage
6864 Cortona Drive
Goleta, California 93117

Sheet Title:
SCE ISLA VISTA SUBSTATION

Date: January 22, 2021
Project Number: 1199-01-Tesla
Sheet Number:

Attachment B

Site Survey Photographs

Photograph 1. View of concrete channel facing north.

Photograph 2. View of substation and improvement area for hammerhead turnaround, access road, ramp, and swing gate facing west.

Photograph 3. View of concrete channel facing south.

Photograph 4. View of culvert upslope of concrete channel facing north.

Photograph 5. View of substation facing east.

Photograph 6. View from proposed vault location facing north.

Photograph 7. View of channel in substation at northwest corner.

Photograph 8. View of channel within substation along southern side, facing east.