

MONTEREY COUNTY ZONING ADMINISTRATOR

Meeting: October 29, 2009 Time: 1:35 PM	Agenda Item No.: 2
Project Description: Coastal Development Permit to allow the excavation of approximately 2,109 cubic yards of potentially contaminated soil within the eastern half of an approximately 41,200 square foot area called the Rock Blotter Area of the Moss Landing Power Plant. Also to be removed, as necessary, remaining concrete foundations associated with previously removed transformers, as well as steel rails and rebar associated with those transformers.	
Project Location: 7251 Highway 1, Moss Landing	APN: 133-181-011-000
Planning File Number: PLN090236	Owner: Pacific Gas and Electric Company Agent: Dynegey
Planning Area: North County Coastal Land Use Plan	Flagged and staked: No
Zoning Designation: : "HI (CZ)" [Heavy Industrial (Coastal Zone)]	
CEQA Action: Negative Declaration, per CEQA Guidelines Section 15070(a)	
Department: RMA - Planning Department	

RECOMMENDATION:

Staff recommends that the Zoning Administrator adopt a resolution (**Exhibit B**) to:

- 1) Consider the Negative Declaration adopted by State of California Department of Toxic Substances Control on June 26, 2009; and
- 2) Approve PLN090236, as described above, based on the findings and evidence and subject to the conditions of approval (**Exhibit B**):

PROJECT OVERVIEW:

Applicant proposes to excavate approximately 2,109 cubic yards of potentially contaminated soil within the eastern half of an approximately 41,200 square foot area called the Rock Blotter Area. The Rock Blotter Area is located within the Area of Concern Power Block 1-5, east of the administration building and north of the building that housed the former power generation units 1-5. The focused portion of the Rock Blotter Area measures approximately 365 feet long and 50 feet wide. The Department of Toxic Substances Control prepared an Interim Measure Work plan which presents the remedial approach for excavation and removal of impacted soils and concrete foundations.

The contaminated soil areas targeted for excavation will be measured and marked prior to the start of excavation. An excavator will be used to remove and stockpile the impacted soils. A loader will be used to place soils into dump trucks for transport to the landfill in accordance with State and Federal regulations. Backfill operations will only be initiated after the contaminated areas are fully excavated and confirmation soil sampling indicates that it is complete. Clean imported soil that meets the environmental and structural requirements will be delivered to the site. Compaction and testing of backfill will be performed in compliance with all applicable requirements of Monterey County.

The Department of Toxic Substances Control prepared an Initial Study and filed a Negative Declaration on June 26, 2009 with the State Clearinghouse (No. 2009051092). The project is located within a high archeological sensitivity zone. There are a few previously recorded pre-historic sites within the vicinity of the Moss Landing Power Plant (MLPP). All of these sites were discovered along with coast, west of Highway 1 where the Elkhorn Slough connects the Moss Landing Harbor. The closest site identified is located approximately a quarter mile

northwest of a previous project site. In May 1999, the applicant was seeking approval from the California Energy Commission (CEC) to construct and operate the proposed 1,060 megawatt Moss Landing Power Plant project. The CEC as the lead agency under the California Environmental Quality Act (CEQA) certified regulatory program, performed environmental analysis of the project. As functionally equivalent to the CEQA process, the CEC's siting process included evaluation of cultural resources. The approved project included conditions to be protective of the known cultural resources which included an archaeologist to ensure that cultural resources were not disturbed.

The current PG&E proposed soil removal action project location is within the confines of the MLPP site and is far from the known site. Therefore, the Initial Study determined that the proposed project could not have a significant effect on the environment.

OTHER AGENCY INVOLVEMENT: The following agencies and departments reviewed this project:

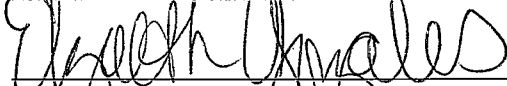
√ RMA - Public Works Department
Environmental Health Division
Water Resources Agency
North County Fire Protection District
Parks Department
California Coastal Commission

Agencies that submitted comments are noted with a check mark ("√"). Conditions recommended by Environmental Health Division have been incorporated into the Condition Compliance/Mitigation Monitoring and Reporting Plan attached as Exhibit 1 to the draft resolution (**Exhibit B**).

The project was referred to the North County Coastal Land Use Advisory Committee (LUAC) on October 5, 2009. However, a quorum was not met and the LUAC meeting was postponed to October 19, 2009. At the time of preparation of the staff report, the meeting had not taken place. Staff will read the recommendation into the record at the Zoning Administrator Hearing on October 28, 2009.

Note: The decision on this project is appealable to the Board of Supervisors and the California Coastal Commission.

/s/ Elizabeth Gonzales



Elizabeth Gonzales, Associate Planner
(831) 755-5102, gonzalesl@co.monterey.ca.us
September 23, 2009

cc: Front Counter Copy; Zoning Administrator; North County Fire Protection District; Public Works Department; Parks Department; Environmental Health Division; Water Resources Agency; California Coastal Commission; Laura Lawrence, Planning Services Manager; Elizabeth Gonzales, Project Planner; Carol Allen, Senior Secretary, Pacific Gas and Electric Company, Owner; Arcadis, Agent; Planning File PLN090236.

Attachments: Exhibit A Project Data Sheet
Exhibit B Draft Resolution, including:
1. Conditions of Approval and Mitigation Monitoring and Reporting Program
2. Site Plan, Floor Plan and Elevations,
Exhibit C Vicinity Map
Exhibit D Negative Declaration

This report was reviewed by Laura Lawrence, Planning Services Manager

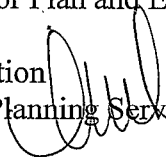


EXHIBIT A

Project Information for PLN090236

Project Title: PACIFIC GAS & ELECTRIC CO

Location: 7251 HWY 1 MOSS LANDING

Primary APN: 133-181-011-000

Applicable Plan: North County Land Use Plan

Coastal Zone: Yes

Permit Type: Coastal Development Permit

Zoning: HI (CZ)

Environmental Status: MND

Plan Designation: HEAVY INDUSTRIA

Advisory Committee: North County (Coastal)

Final Action Deadline (884): 2/24/2010

Project Site Data:

Lot Size: 134 ACRES

Coverage Allowed: N/A

Coverage Proposed: N/A

Existing Structures (sf): N/N

Height Allowed: N/A

Proposed Structures (sf): N/A

Height Proposed: N/A

Total Sq. Ft.: N/A

FAR Allowed: N/A

FAR Proposed: N/A

Resource Zones and Reports:

Environmentally Sensitive Habitat: No

Erosion Hazard Zone: LOW

Biological Report #: N/A

Soils Report #: N/A

Forest Management Rpt. #: N/A

Archaeological Sensitivity Zone: HIGH

Geologic Hazard Zone: VI -HIGH

Archaeological Report #: N/A

Geologic Report #: N/A

Fire Hazard Zone: NO

Traffic Report #: N/A

Other Information:

Water Source: N/A

Sewage Disposal (method): N/A

Water Dist/Co: N/A

Sewer District Name: N/A

Fire District: NORTH COUNTY FIRE DIST

Grading (cubic yds.): 2,109.0

Tree Removal: N/A

**EXHIBIT B
DRAFT RESOLUTION**

**Before the Zoning Administrator in and for the
County of Monterey, State of California**

In the matter of the application of:

PACIFIC GAS AND ELECTRIC COMPANY (PLN090236)

RESOLUTION NO. ----

Resolution by the Monterey County Zoning
Administrator:

- 1) Considers the Negative Declaration adopted by State of California Department of Toxic Substances Control on June 26, 2009; and
- 1) Approves PLN090236 Coastal Development Permit to allow the excavation of approximately 2,109 cubic yards of potentially contaminated soil within the eastern half of an approximately 41,200 square foot area called the Rock Blotter Area of the Moss Landing Power Plant. Also to be removed, as necessary, remaining concrete foundations associated with previously removed transformers, as well as steel rails and rebar associated with those transformers.

(PLN090236, Pacific Gas and Electric Company, 7251 Highway One, Moss Landing, North County Land Use Plan, APN: 133-181-011-000)

The Coastal Development Permit application (PLN090236) came on for public hearing before the Monterey County Zoning Administrator on October 29, 2009. Having considered all the written and documentary evidence, the administrative record, the staff report, oral testimony, and other evidence presented, the Zoning Administrator finds and decides as follows:

FINDINGS

1. **FINDING:** **CONSISTENCY** – The Project, as conditioned, is consistent with the applicable plans and policies which designate this area as appropriate for development.
EVIDENCE: a) During the course of review of this application, the project has been reviewed for consistency with the text, policies, and regulations in:
 - the Monterey County General Plan,
 - North County Land Use Plan,
 - Monterey County Coastal Implementation Plan, Part 2,
 - Monterey County Zoning Ordinance (Title 20)No conflicts were found to exist. No communications were received during the course of review of the project indicating any inconsistencies with the text, policies, and regulations in these documents.
b) The property is located at 7251 Highway 1, Moss Landing (Assessor's

Parcel Number 133-181-011-000, North County Land Use Plan. The parcel is zoned Heavy Industrial (HI (CZ)) which allows uses accessory to industrial uses in the Heavy Industrial District; Therefore, the project is an allowed land use for this site.

- c) The proposed project site is located in an area already disturbed by past development of the property, and will have no effect on special-status species, sensitive habitat, or other significant biological resources (North County Coastal LUP Policy 2.3.2.1). No tree removal is proposed, and there is no evidence that any cultural resources would be disturbed (North County Coastal LUP Policy 2.9.1).
- d) General Development Plan: Pursuant to Section 20.28.030.A.E, the requirement for a General Development Plan (GDP) is waived by the Director of Planning. There is no potential significant adverse impact from the development, and requiring a GDP will not further the purpose of the applicable chapter in Title 20. The project involves the excavation of approximately 2,109 cubic yards of potentially contaminated soil within an area that measures approximately 365 feet long and 50 feet wide. Also to be removed, as necessary, remaining concrete foundations associated with previously removed transformers, as well as steel rails and rebar associated with those transformers.
- e) The project planner conducted a site inspection on August 13, 2009 to verify that the project on the subject parcel conforms to the plans listed above.
- f) The project was referred to the North County Coastal Land Use Advisory Committee (LUAC) on October 5, 2009. However, a quorum was not met and the LUAC meeting was postponed to October 19, 2009. At the time of preparation of the staff report, the meeting had not taken place. Staff will read the recommendation into the record at the Zoning Administrator Hearing on October 28, 2009.
- g) The application, project plans, and related support materials submitted by the project applicant to the Monterey County RMA - Planning Department for the proposed development found in Project File PLN090236.

2. **FINDING:** **SITE SUITABILITY** – The site is physically suitable for the use proposed.

- EVIDENCE:**
- a) The project has been reviewed for site suitability by the following departments and agencies: RMA - Planning Department, North County Fire Protection District, Parks, Public Works, Environmental Health Division, and Water Resources Agency. There has been no indication from these departments/agencies that the site is not suitable for the proposed development. Conditions recommended have been incorporated.
 - b) No technical reports were required by outside consultants as the applicant prepared its own environmental impact analysis. The analysis indicates that there are no physical or environmental constraints that would indicate that the site is not suitable for the use proposed. Although County records identify the project site is within an area of high archaeological sensitivity; previous archaeological reports prepared for the site indicate there would be no potential impacts as a result of the this project. Pursuant with CIP Policy

20.144.110.B.5.a, allows the Director of Planning to waive the requirement for a report based on a previous report prepared for the site. In 1999, Archaeological Consulting prepared an extensive on-site survey of the accessible portions of the Area of Potential Effects (APE) for the parcel. Soil visibility on the northwest portion of the Moss Landing Power Plant (MLPP) provided evidence of an archaeological site which was located approximately one-quarter from a previously approved project. Survey of the other accessible portions of the MLPP showed no evidence of cultural material. The current PG&E proposed soil removal action project location is within the confines of the MLPP site and is far from the known site. Therefore, the proposed project could not have a significant effect on the environment. County staff independently reviewed the environmental assessment provided in the Initial Study and concurs with its conclusions. However, because the parcel is located in a high archaeological sensitivity zone, staff has conditioned the project to limit the excavation area (Condition #4).

- c) Staff conducted a site inspection on August 13, 2009 to verify that the site is suitable for this use.
- d) The application, project plans, and related support materials submitted by the project applicant to the Monterey County RMA - Planning Department for the proposed development found in Project File PLN090236.

3. **FINDING:** **HEALTH AND SAFETY** - The establishment, maintenance, or operation of the project applied for will not under the circumstances of this particular case be detrimental to the health, safety, peace, morals, comfort, and general welfare of persons residing or working in the neighborhood of such proposed use, or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

- EVIDENCE:**
- a) The project was reviewed by the RMA - Public Works, Water Resources Agency, Environmental Health Division, North County Fire Protection Agency and RMA – Planning Department. The respective departments/agencies have recommended conditions, where appropriate, to ensure that the project will not have an adverse effect on the health, safety, and welfare of persons either residing or working in the neighborhood.
 - b) The Department of Toxic Substances Control (DTSC) has completed an Initial Study and filed a Negative Declaration for the project. On the basis of the information presented in the Initial Study, the proposed project could not have a significant effect on the environment. (*See Finding #5*)
 - c) See Findings #1 and #2 and supporting evidence for PLN090236.

4. **FINDING:** **NO VIOLATIONS** - The subject property is in compliance with all rules and regulations pertaining to zoning uses, subdivision, and any other applicable provisions of the County's zoning ordinance. No violations exist on the property.

- EVIDENCE:**
- a) Staff reviewed Monterey County RMA - Planning Department and Building Services Department records and is not aware of any

- violations existing on subject property.
- b) Staff conducted a site inspection on August 13, 2009 and researched County records to assess if any violation exists on the subject property.
- c) There are no known violations on the subject parcel.
- d) The application, plans and supporting materials submitted by the project applicant to the Monterey County Planning Department for the proposed development are found in Project File PLN090236.

5. **FINDING:** **CEQA (Negative Declaration)** - On the basis of the whole record before the Monterey County Zoning Administrator, there is no substantial evidence that the proposed project as designed and conditioned, will have a significant effect on the environment. The County, as the decision-making body of a Responsible Agency, hereby confirms that it reviewed and considered the information contained in the Lead Agency's (Department of Toxic Substances Control) Initial Study prior to acting upon or approving the project. The Negative Declaration reflects the independent judgment and analysis of the County.

- EVIDENCE:**
- a) Public Resources Code Section 21080.d and California Environmental Quality Act (CEQA) Guidelines Section 15064.a.1 require environmental review if there is substantial evidence that the project may have a significant effect on the environment.
 - b) Pursuant to CEQA Guidelines 15050(a), Where a project is to be carried out or approved by more than one public agency, one public agency shall be responsible for preparing an EIR or negative declaration for the project. This agency shall be called the Lead Agency.
 - c) The Lead Agency, Department of Toxic Substances Control, distributed the final Initial Study to responsible agencies, trustee agencies, and interested parties, including the State Clearinghouse (SCH# 2009051092). The public review and comment period for this document was from June 26, 2009 to July 26, 2009.
 - d) The County, a Responsible Agency, received the final document from the Lead Agency with the application materials. This document analyzed the environmental impacts of all potential impacts within the Initial Study. Findings conclude that the proposed project could not have a significant effect on the environment.
 - e) Soil visibility on the northwest portion of the Moss Landing Power Plant (MLPP) provided evidence of an archaeological site which was located approximately one-quarter from a previously approved project. The current PG&E proposed soil removal action project location is within the confines of the MLPP site and is far from the known site. Therefore, the proposed project could not have a significant effect on the environment. County staff independently reviewed the environmental assessment provided in the Initial Study and concurs with its conclusions.
 - f) The Lead Agency certified the Initial Study and Negative Declaration for this project on June 26, 2009, per Statutory Authority - California Health & Safety Code, Chapter 6.5.
 - g) The documents are on file in the office of the RMA – Planning Department and is hereby incorporated by reference (PLN090236/Pacific Gas and Electric Company):

- i. Final Initial Study and Negative Declaration (SCH#2009051092), June 26, 2009.
 - h) The Zoning Administrator considered the Initial Study and Negative Declaration at a duly noticed public hearing held on October 29, 2009. The County is serving as a Responsible Agency for this project. The materials upon which the County's decision is based are located in the Planning Department, 168 W. Alisal Street, 2nd Floor, Salinas, CA
 - i) No new information of substantial importance has been presented, which was not known and could not have been known with the exercise of reasonable diligence at the time the Initial Study and Negative Declaration was certified by the Lead Agency. All identified potential impacts have been mitigated to a level less than significant, and no unresolved issues remain. There are no changes in the project or unusual circumstances that exist which would necessitate additional environmental review by the County of Monterey

- 5. **FINDING: PUBLIC ACCESS** – The project is in conformance with the public access and recreation policies of the Coastal Act (specifically Chapter 3 of the Coastal Act of 1976, commencing with Section 30200 of the Public Resources Code) and Local Coastal Program, and does not interfere with any form of historic public use or trust rights.
 - EVIDENCE:**
 - a) No access is required as part of the project as no substantial adverse impact on access, either individually or cumulatively, as described in Section 20.70.050.B.4.c of the Monterey County Coastal Implementation Plan can be demonstrated.
 - b) The subject property is not described as an area where the Local Coastal Program requires public access (Figure 6 of the Shoreline Access/Trails Map in the North County Land Use Plan).
 - c) No evidence or documentation has been submitted or found showing the existence of historic public use or trust rights over this property.
 - d) The application, plans and supporting materials submitted by the project applicant to the Monterey County Planning Department for the proposed development are found in Project File PLN090236.
 - e) The project planner conducted a site inspection on August 13, 2009.

- 6. **FINDING: APPEALABILITY** - The decision on this project may be appealed to the Board of Supervisors and the California Coastal Commission
 - EVIDENCE:**
 - a) Section 20.86.070 Monterey County Zoning Ordinance (Board of Supervisors).
 - b) Section 20.86.080.A.3 Monterey County Zoning Ordinance (Coastal Commission). The project is subject to appeal by/to the California Coastal Commission because any approved project involving development that is permitted in the underlying zone as a conditional use is appealable.

DECISION

NOW, THEREFORE, based on the above findings and evidence, the Zoning Administrator does hereby:

- A. Consider the Negative Declaration adopted by State of California Department of Toxic Substances Control on June 26, 2009; and

- B. Approve Coastal Development Permit, in general conformance with the attached sketch (**Exhibit 2**) and subject to the conditions (**Exhibit 1**), both exhibits being attached hereto and incorporated herein by reference.

PASSED AND ADOPTED this 29th day of October, 2009

Mike Novo, Zoning Administrator

COPY OF THIS DECISION MAILED TO APPLICANT ON _____.

THIS APPLICATION IS APPEALABLE TO THE BOARD OF SUPERVISORS.

IF ANYONE WISHES TO APPEAL THIS DECISION, AN APPEAL FORM MUST BE COMPLETED AND SUBMITTED TO THE CLERK TO THE BOARD ALONG WITH THE APPROPRIATE FILING FEE ON OR BEFORE _____.

THIS PROJECT IS LOCATED IN THE COASTAL ZONE AND IS / IS NOT APPEALABLE TO THE COASTAL COMMISSION. UPON RECEIPT OF NOTIFICATION OF THE FINAL LOCAL ACTION NOTICE (FLAN) STATING THE DECISION BY THE FINAL DECISION MAKING BODY, THE COMMISSION ESTABLISHES A 10 WORKING DAY APPEAL PERIOD. AN APPEAL FORM MUST BE FILED WITH THE COASTAL COMMISSION. FOR FURTHER INFORMATION, CONTACT THE COASTAL COMMISSION AT (831) 427-4863 OR AT 725 FRONT STREET, SUITE 300, SANTA CRUZ, CA

This decision, if this is the final administrative decision, is subject to judicial review pursuant to California Code of Civil Procedure Sections 1094.5 and 1094.6. Any Petition for Writ of Mandate must be filed with the Court no later than the 90th day following the date on which this decision becomes final.

NOTES

1. You will need a building permit and must comply with the Monterey County Building Ordinance in every respect.

Additionally, the Zoning Ordinance provides that no building permit shall be issued, nor any use conducted, otherwise than in accordance with the conditions and terms of the permit granted or until ten days after the mailing of notice of the granting of the permit by the appropriate authority, or after granting of the permit by the Board of Supervisors in the event of appeal.

Do not start any construction or occupy any building until you have obtained the necessary permits and use clearances from the Monterey County Planning Department and Building Services Department office in Salinas.

2. This permit expires 4 years after the above date of granting thereof unless construction or use is started within this period.

RESOLUTION ____ - EXHIBIT 1
Monterey County Resource Management Agency
Planning Department
Condition Compliance and/or Mitigation Monitoring
Reporting Plan

Project Name: Pacific Gas & Electric
File No: PLN090236 **APN:** 133-181-011-000
Approved by: Zoning Administrator **Date:** _____

**Monitoring or Reporting refers to projects with an EIR or adopted Mitigated Negative Declaration per Section 21081.6 of the Public Resources Code.*

<i>Permit Cond. Number</i>	<i>Mitig. Number</i>	<i>Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department</i>	<i>Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.</i>	<i>Responsible Party for Compliance</i>	<i>Timing</i>	<i>Verification of Compliance (name/date)</i>
RMA – Planning Department						
1.		<p>PD001 - SPECIFIC USES ONLY This Coastal Development Permit (PLN090236) allows the excavation of approximately 2,109 cubic yards of potentially contaminated soil within the eastern half of an approximately 41,200 square foot area called the Rock Blotter Area of the Moss Landing Power Plant. Also to be removed, as necessary, remaining concrete foundations associated with previously removed transformers, as well as steel rails and rebar associated with those transformers. The property is located at 7251 Highway One Moss Landing (Assessor's Parcel Number 133-181-011-000), North County Land Use Plan. This permit was approved in accordance with County ordinances and land use regulations subject to the following terms and conditions. Any use or construction not in substantial conformance with the terms and conditions of this permit is a violation of County regulations and may result in modification or revocation of this permit and subsequent legal action. No use or construction other than that specified by this permit is allowed unless additional permits are approved by the appropriate authorities. (RMA-Planning Department)</p>	<p>Adhere to conditions and uses specified in the permit.</p>	Pacific Gas and Electric Company/ Applicant	Ongoing unless otherwise stated	
			<p>Neither the uses nor the construction allowed by this permit shall commence unless and until all of the conditions of this permit are met to the satisfaction of the Director of the RMA - Planning Department.</p>	RMA - Planning		

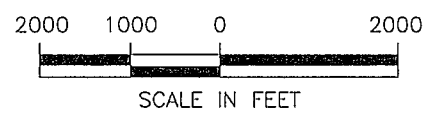
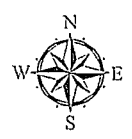
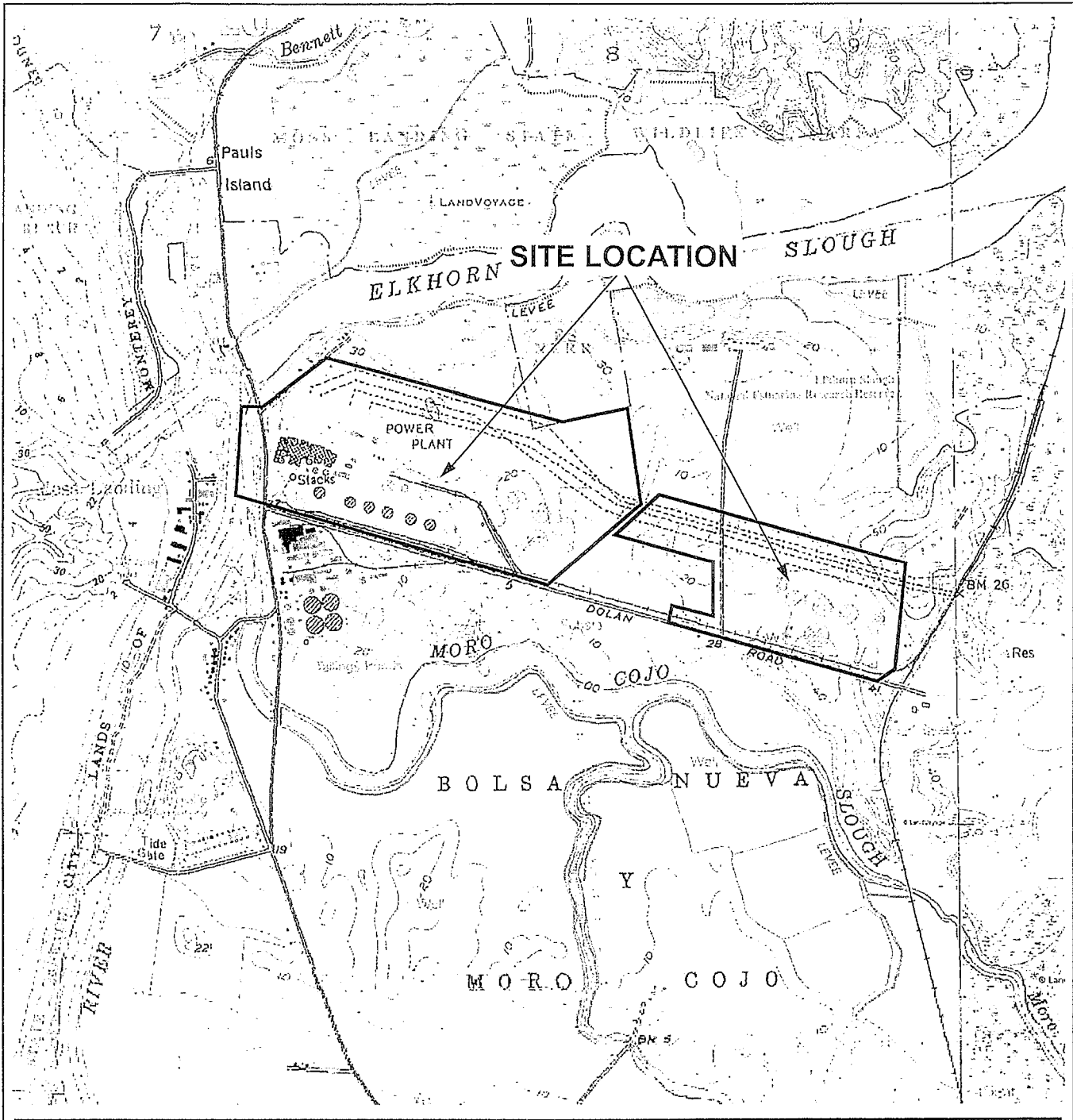
<i>Permit Cond. Number</i>	<i>Mitig. Number</i>	<i>Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department</i>	<i>Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.</i>	<i>Responsible Party for Compliance</i>	<i>Timing</i>	<i>Verification of Compliance (name/date)</i>
2.		PD002 - NOTICE-PERMIT APPROVAL The applicant shall record a notice which states: "A permit (Resolution _____) was approved by the Zoning Administrator for Assessor's Parcel Number 133-181-011-000 on October 29, 2009. The permit was granted subject to 6 conditions of approval which run with the land. A copy of the permit is on file with the Monterey County RMA - Planning Department." (RMA-Planning Department)	Obtain appropriate form from the RMA-Planning Department. The applicant shall complete the form and furnish proof of recordation of this notice to the RMA - Planning Department.	Pacific Gas and Electric Company/ Applicant RMA-Planning	Prior to the issuance of grading and building permits or commencement of use.	
3.		PD032(A) - PERMIT EXPIRATION The permit shall be granted for a time period of four years, to expire on October 29, 2013 unless use of the property or actual construction has begun within this period. (RMA - Planning Department)	The applicant shall obtain a valid grading or building permit and/or commence the authorized use to the satisfaction of the Director of Planning. Any request for extension must be received by the Planning Department at least 30 days prior to the expiration date.	Pacific Gas and Electric Company/ Applicant	As stated in the conditions of approval	
4.		PDSP001- CULTURAL RESOURCES - HIGH ARCHAEOLOGICAL SENSITIVITY (NON-STANDARD) Excavation shall be limited to only those areas approved. If, during the course of excavation, cultural, archaeological, historical or paleontological resources are	The applicant shall provide a Construction Management Plan to the RMA-Planning Department for review and approval. The plan shall include designated staging areas for vehicles and materials.	Owner / Applicant	Prior to the issuance of grading, or building permits.	

<i>Permit Cond. Number</i>	<i>Mitig. Number</i>	<i>Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department</i>	<i>Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.</i>	<i>Responsible Party for Compliance</i>	<i>Timing</i>	<i>Verification of Compliance (name/date)</i>
		uncovered at the site (surface or subsurface resources) work shall be halted immediately within 50 meters (165 feet) of the find until a qualified professional archaeologist can evaluate it. The Monterey County RMA - Planning Department and a qualified archaeologist (i.e., an archaeologist registered with the Society of Professional Archaeologists) shall be immediately contacted by the responsible individual present on-site. When contacted, the project planner and the archaeologist shall immediately visit the site to determine the extent of the resources and to develop proper mitigation measures required for the discovery. (RMA - Planning Department)	Stop work within 50 meters (165 feet) of uncovered resource and contact the Monterey County RMA - Planning Department and a qualified archaeologist immediately if cultural, archaeological, historical or paleontological resources are uncovered. When contacted, the project planner and the archaeologist shall immediately visit the site to determine the extent of the resources and to develop proper mitigation measures required for the discovery.	Owner / Applicant/ Archaeologist	Ongoing	
5.		PD007 - GRADING-WINTER RESTRICTION No land clearing or grading shall occur on the subject parcel between October 15 and April 15 unless authorized by the Director of RMA - Building Services Department. (RMA – Planning Department and Building Services Department)	Obtain authorization from the Director of RMA - Building Services Department to conduct land clearing or grading between October 15 and April 15.	Owner / Applicant	Ongoing	
		PD029 - HOURS OF OPERATION (NON-STANDARD) Hours of operation shall be 7:00 am to 5:00 pm, Monday through Friday. In order to minimize the impacts of construction-related traffic and truck hauling operation on the local road system, the applicant shall utilize routes that will not adversely impact congestion. (RMA – Planning Department)	Demonstrate compliance with the hours of operation to the Director of RMA – Planning Department.	Owner / Applicant	Ongoing	

<i>Permit Cond. Number</i>	<i>Mitig. Number</i>	<i>Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department</i>	<i>Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.</i>	<i>Responsible Party for Compliance</i>	<i>Timing</i>	<i>Verification of Compliance (name/date)</i>
Health Department Environmental Health Division						
6.		EHSP0001 - The Department of Toxic Substances Control (DTSC) and the California Environmental Protection Agency (Cal EPA) are the regulatory lead on this project, all plans for the remediation have been routed to these agency. ARCADIS on behalf of PG&E will be handling the remediation of the site. Monterey County Health Department HAZ MAT will receive summary report when project is completed. (Environmental Health)	DTSC lead agency for project, all plans for remediation will be routed to them.	CA Licensed Engineer /Owner/ Applicant	Completion of project	

END OF CONDITIONS

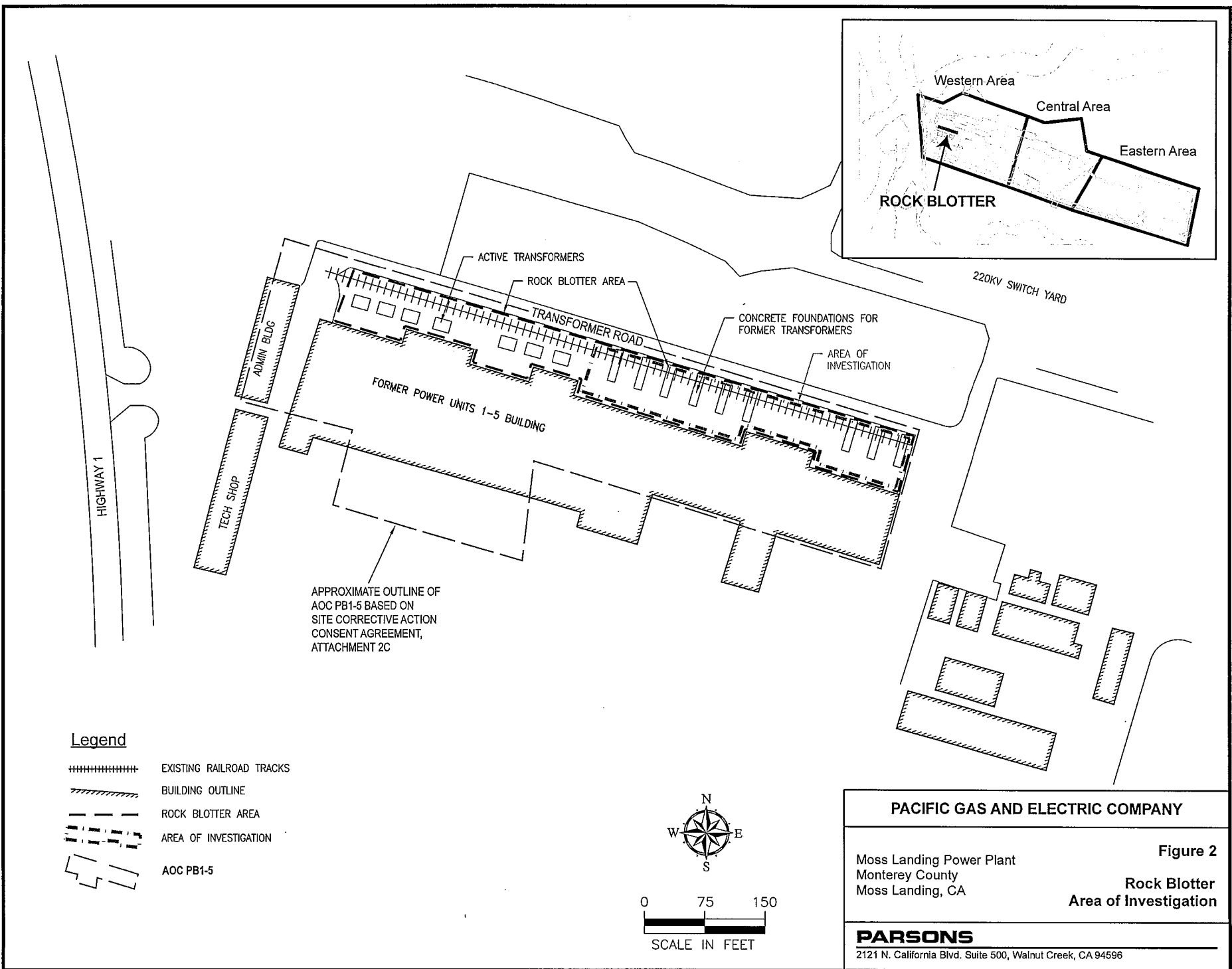
Rev. 07/29/2009

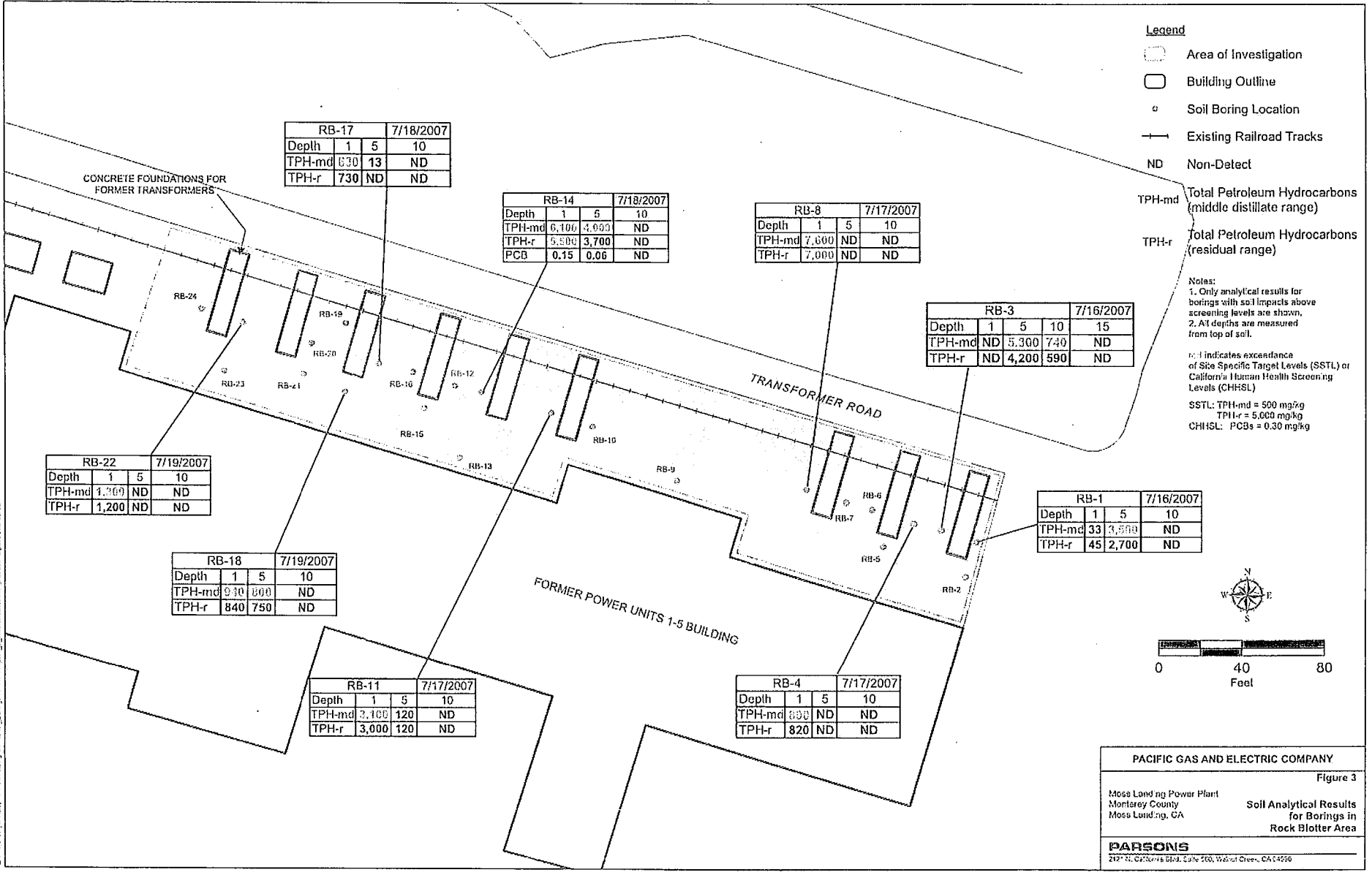


PACIFIC GAS AND ELECTRIC COMPANY	
Figure 1	
Moss Landing Power Plant Monterey County Moss Landing, CA	
Site Location Map	
PARSONS	
2121 N. California Blvd, Suite 500, Walnut Creek, CA 94596	

C:\Projects\gem33397\MossLanding\CTFCTF_BoringLocations\Figure_1_ReckBlotter.pdf 05/30/2008

C:\Projects\gms38397\MossLanding\CTF_Boring\Locations\Figure_2_RockBlotterAreaLocation.pdf 6/17/2008





RB-17		7/18/2007	
Depth	1	5	10
TPH-md	630	13	ND
TPH-r	730	ND	ND

RB-14		7/18/2007	
Depth	1	5	10
TPH-md	6,100	4,000	ND
TPH-r	5,500	3,700	ND
PCB	0.15	0.06	ND

RB-8		7/17/2007	
Depth	1	5	10
TPH-md	7,600	ND	ND
TPH-r	7,000	ND	ND

RB-3		7/16/2007		
Depth	1	5	10	15
TPH-md	ND	5,300	740	ND
TPH-r	ND	4,200	590	ND

RB-22		7/19/2007	
Depth	1	5	10
TPH-md	1,300	ND	ND
TPH-r	1,200	ND	ND

RB-18		7/19/2007	
Depth	1	5	10
TPH-md	930	000	ND
TPH-r	840	750	ND

RB-11		7/17/2007	
Depth	1	5	10
TPH-md	2,100	120	ND
TPH-r	3,000	120	ND

RB-4		7/17/2007	
Depth	1	5	10
TPH-md	800	ND	ND
TPH-r	820	ND	ND

RB-1		7/16/2007	
Depth	1	5	10
TPH-md	33	3,500	ND
TPH-r	45	2,700	ND

Legend

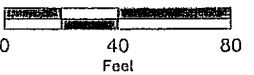
- Area of Investigation
- Building Outline
- Soil Boring Location
- Existing Railroad Tracks
- ND Non-Detect

TPH-md Total Petroleum Hydrocarbons (middle distillate range)
 TPH-r Total Petroleum Hydrocarbons (residual range)

Notes:
 1. Only analytical results for borings with soil impacts above screening levels are shown.
 2. All depths are measured from top of soil.

ND indicates exceedance of Site Specific Target Levels (SSTL) or California Human Health Screening Levels (CHHSL)

SSTL: TPH-md = 500 mg/kg
 TPH-r = 5,000 mg/kg
 CHHSL: PCBs = 0.30 mg/kg



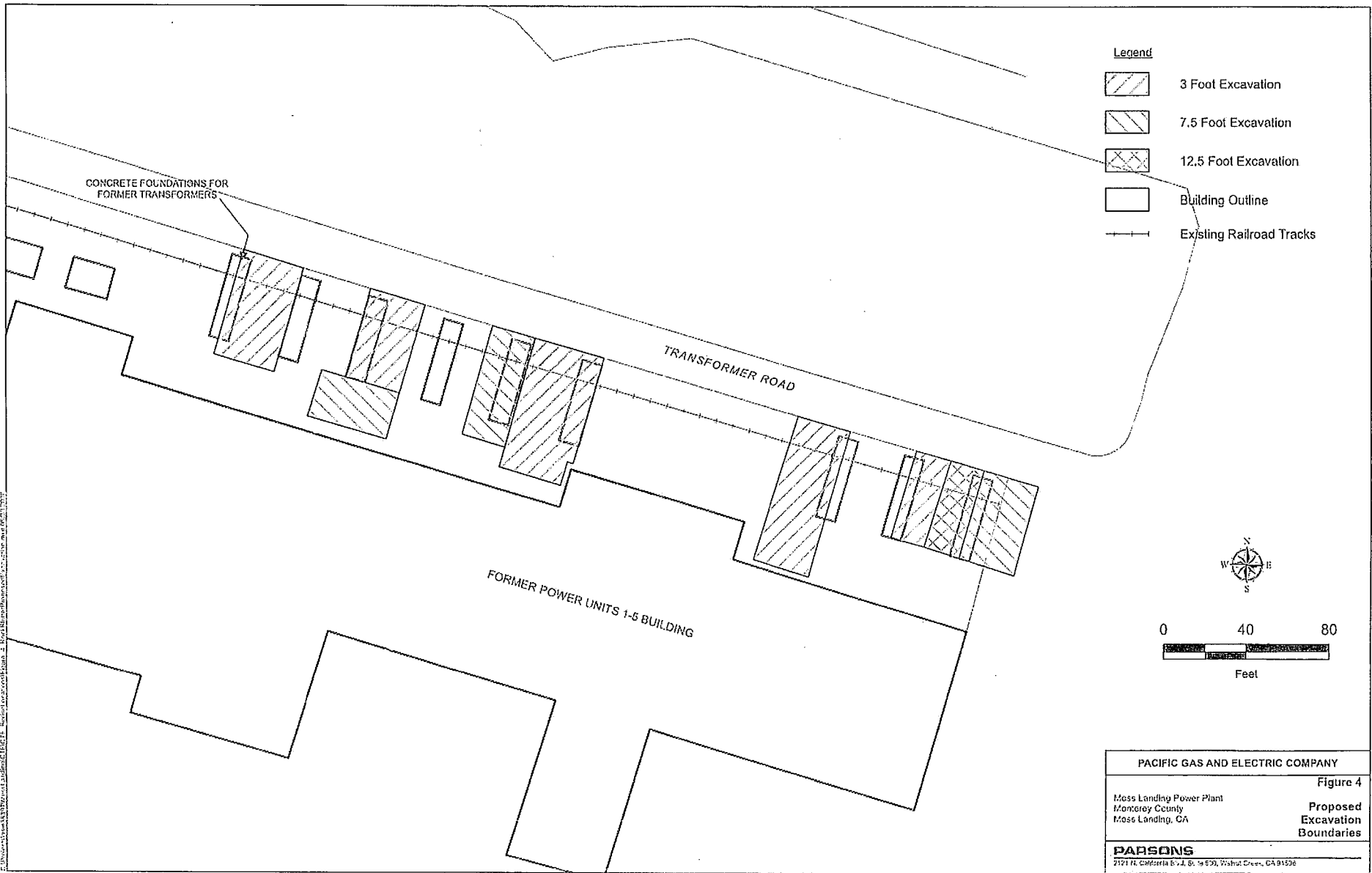
PACIFIC GAS AND ELECTRIC COMPANY

Figure 3

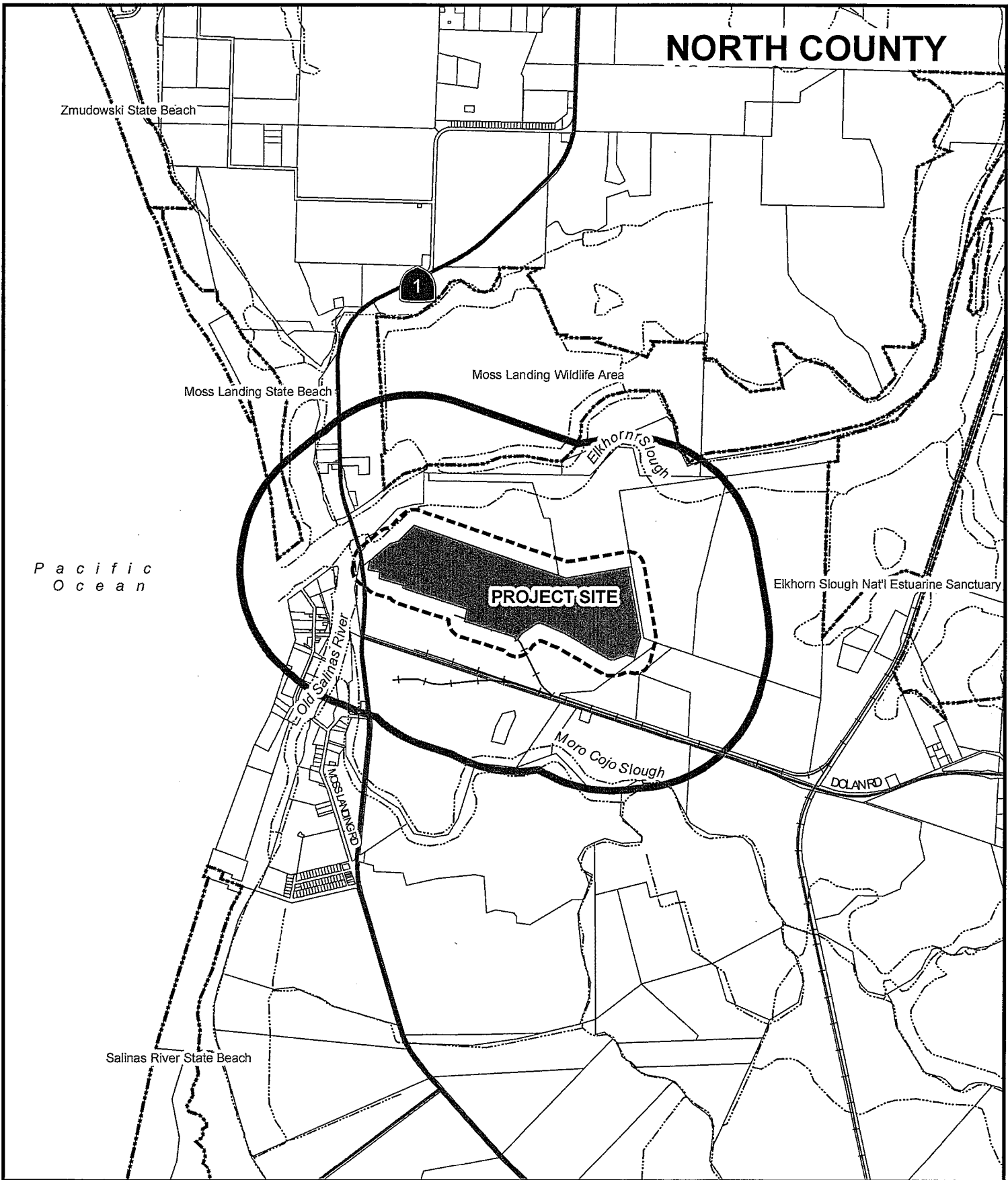
Moss Landing Power Plant
 Monterey County
 Moss Landing, CA
Soil Analytical Results
 for Borings in
 Rock Blotter Area

PARSONS
 2171 St. Charles St., Suite 500, Walnut Creek, CA 94596

C:\pge\moss\10207\10207.mxd 10/27/07 10:41:00 AM 10/27/07 10:41:00 AM 10/27/07 10:41:00 AM






NORTH COUNTY

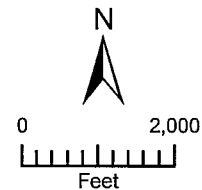


APPLICANT: PACIFIC GAS & ELECTRIC CO

APN: 133-181-010-000

FILE # PLN090236

 300' Limit  2500' Limit  City Limits



PLANNER: GONZALES

NEGATIVE DECLARATION

Department of Toxic Substances Control
Standardized Permitting and Corrective Action Branch
8800 Cal Center drive
Sacramento, California 95826-3200

Subject: DRAFT FINAL MITIGATED

Project Title: Interim Measures Work Plan for AOC Power Block 1-5, Rock Blotter Area, Moss Landing Power Plant
Pacific Gas and Electric Company

State Clearinghouse No: 2009051092

Project Location: Highway 1 and Dolan Road, Moss Landing, California, 95039

County: Monterey

Project Description: The Department of Toxic Substances Control (DTSC) is proposing to approve Interim Measure (IM) Workplan for the Rock Blotter Area in Area Of Concern (AOC) Power Block 1-5, at Moss Landing Power Plant (MLPP) formerly owned by Pacific Gas and Electric Company (PG&E) in Moss Landing, (Environmental Protection Agency identification number CAT080011653). The IM Workplan includes procedures to be used in excavation of impacted soil beneath a former row of transformers in the eastern part of the Rock Blotter Area in Power Block 1-5 at the MLPP. This Workplan was prepared and submitted by Parsons on behalf of PG&E and it is incorporated by reference.

MLPP is located east of the community of Moss Landing in Monterey County, California. It occupies approximately 236 acres east of State Highway 1 and north of Dolan Road. MLPP has been involved with power generation at the site since its inception in 1949. First three power generation units began operations in 1950. Units 4 and 5 were completed in 1952 and all five units 1-5 were retired in 1995. The current owner Dynegy took control of the facility in 2007 and currently operates four power generation units with a total generation capacity of 2529 megawatts. Two of the units are combine cycle power generation units and the other two are steam turbine units.

AOC Power Block 1-5, Rock Blotter Area

The Rock Blotter Area is located within AOC Power Block 1-5, east of the administration building and north of building that housed the former power generation units 1-5. The Rock blotter Area measures 640 feet long and 50 feet wide and there were 16 large transformers in use in this area. The eastern part of the Rock Blotter Area along the north side of the building that housed the former power generation units 1-5 has been investigated, and is the focus of the proposed project. This portion measures approximately 365 feet long and 50 feet wide. Nine transformers have been removed from this area but the concrete foundations are still in place. The IM Workplan presents the remedial approach for excavation and removal of impacted soils and concrete foundations.

The remedial objective for this site is to excavate and remove soil containing contaminants of concern total petroleum hydrocarbons in the middle distillate (TPH-md) and residual ranges (TPH-r), and polychlorinated biphenyls (PCBs) based on the findings of the previous investigation. The total volume of soil anticipated to be removed from the site is approximately 2,109 cubic yards (CY), which is equivalent to approximately 4,400 tons.

Excavation

The contaminated soil area(s) targeted for excavation will be measured and marked prior to the start of excavation. An excavator will be used to remove and stockpile the impacted soils. A loader will be used to place soils into the end dump trucks for transport to the landfill in accordance with State and Federal regulations. Also, a large foot roller will be used for compaction of the backfill material and a water truck or towable spray tank will be used for dust suppression. The proposed footprint of the excavation encompasses identified sources of Total petroleum hydrocarbons and polychlorinated biphenyls found in soil. Three levels of field screening will be performed to determine excavation limits –

- 1) Check using visual, olfactory observations
- 2) Test using screening analytical kits and
- 3) Confirmation sample laboratory analysis

Backfill and Compaction

Backfill operations will only be initiated after the contaminated areas are fully excavated and confirmation soil sampling indicates that it is complete. Clean imported soil that meets the environmental and structural requirements will be delivered to the site. The proposed backfill source will be confirmed as clean by sampling and analysis. After the base of the excavation is compacted, the clean import soil will be placed in loose lifts and it will be moistened as required to achieve optimum conditions for compaction. Compaction and testing of backfill will be performed in compliance with all applicable requirements of Monterey County.

All waste generated during site remediation will be properly characterized and disposed at a permitted disposal facility in accordance with Federal, State and local regulations.

Implementation of the interim measures will require a standard health and safety protocols for the protection of the industrial worker and the surrounding environment.

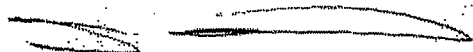
The project is expected to commence in June 2009 and is expected to take no longer than 3 months to complete the remediation activities.

Finding of Significant Effect on Environment: (An Initial Study supporting this finding is attached.)

On the basis of the information presented in the attached Initial Study, I find that the proposed project could not have a significant effect on the environment.

Mitigation Measures:

DTSC has determined that the project does not require any mitigation measures beyond those incorporated as part of the project description.



6/26/2009

Unit Supervisor Signature

Date

Donn Diebert, P.E.

Supervising Hazardous Substances Engineer,
Brownfields and Environmental Restoration Program

(916) 255-3728

Unit Supervisor Name

Unit Supervisor Title

Phone #

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

PROJECT TITLE: Interim Measures Work Plan, Area of Concern Power Block 1-5, Rock Blotter Area, Moss Landing Power Plant		CALSTARS CODING: PCA: 22120 SITE: 200186-48 MPC: 71
PROJECT ADDRESS: Highway 1 and Dolan Road, Moss Landing, California 95039	CITY: Moss Landing (Census-designated place)	COUNTY: Monterey
PROJECT SPONSOR: Pacific Gas and Electric Company	CONTACT: Mr. Drew Squyres	PHONE: (805) 546-3854

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:			
<input type="checkbox"/> Initial Permit Issuance	<input type="checkbox"/> Permit Renewal	<input type="checkbox"/> Permit Modification	<input type="checkbox"/> Closure Plan
<input type="checkbox"/> Removal Action Workplan	<input type="checkbox"/> Remedial Action Plan	<input checked="" type="checkbox"/> Interim Removal	<input type="checkbox"/> Regulations
<input type="checkbox"/> Other (specify):			

STATUTORY AUTHORITY:
<input checked="" type="checkbox"/> California H&SC, Chap. 6.5 <input type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify):

DTSC PROGRAM/ ADDRESS: Brownfields and Environmental Restorations Program, 8800 Cal Center Drive, Sacramento California 95826	CONTACT: Ms. Suhasini Patel	PHONE: (916) 255-6428
--------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------	---------------------------------

PROJECT DESCRIPTION:

The Department of Toxic Substances Control (DTSC) is proposing to approve Interim Measure (IM) Workplan pursuant to authority granted under Chapter 6.5, Division 20, California Health & Safety Code (H&SC).

The objective of this corrective action Interim Measure (IM) is to remove soil containing total petroleum hydrocarbons (TPH) and polychlorinated biphenyls (PCBs) in order to protect human health and the environment. The IM Work Plan proposes excavation and removal of impacted soils beneath a former row of transformers that has been decommissioned. The planned lateral and vertical extent of the excavations have been based on findings of environmental soil investigation (Parsons, 2007) and a previous limited soil removal action (Mittelhauser, 1994).

The Rock Blotter Area is located within Area of Concern (AOC) Power Block (PB) 1-5 in the western portion of Moss Landing Power Plant (MLPP) (Figure 1). The Rock Blotter Area is east of the administration building and north of the former Power Plant Units 1 – 5 building (Figure 2). Operating plant equipment has been removed by the property owner from the eastern half of the transformer rock blotter in this AOC identified as PB 1-5 Soil. The Rock Blotter Area measures approximately 640 feet long and 50 feet wide.

The remedial objective for this site is to excavate and remove soil exceeding the Site specific target levels (SSTLs) for TPH and California Human Health Screening Level (CHHSL) for

PCBs. Thus eliminating potential exposure pathways to on-site receptors from soil, as well as the potential for impacts to the groundwater. The targeted contaminants at the site for remedial action are based on the findings of the previous investigation. The contaminants of concern are total petroleum hydrocarbons in the middle distillate (TPH-md) and residual ranges (TPH-r), and PCBs. The applicable soil standards for these contaminants are as follows:

- TPH-md (C12-C23) = 500 mg/kg (SSTL);
- TPH-r (C24-C36) = 5,000 mg/kg (SSTL); and
- PCBs = 0.30 mg/kg (CHHSL)

Locations of soil samples that exceeded these standards are shown on Figure 3 and the proposed limits of the remedial excavations are shown on Figure 4.

The actual depths excavated may vary based on visual observations and soil sample analysis results. The total volume of soil anticipated to be removed from the site is approximately 2,109 cubic yards (CY), which is equivalent to approximately 4,400 tons. If additional impacts are observed in the field, then the excavation will expand (vertically and horizontally), which will increase the quantity of material to be removed. However, the excavation boundaries are constrained on all sides and there is thus a limit to how far excavations can expand. Confirmation soil samples will be collected from the bottom and sidewalls of each pit to ensure that all of the contaminated soil has been removed before the excavations are backfilled with clean soil. This cleanup is an interim measure to industrial standards. A final remedy will follow after evaluation of the site for further corrective action necessary to eliminate potential threat to on-site receptors from soil and the groundwater

Summary of Removal Activities

The contaminated soil area(s) targeted for excavation will be measured and marked prior to the start of excavation and are provided in Figure 4. The actual depths excavated may vary based on visual observations and soil sample analysis results. The total volume of soil anticipated to be removed from the site is approximately 2,109 CY, which is equivalent to approximately 4,400 tons. If additional impacts are observed in the field, then the excavation will expand (vertically and horizontally), which will increase the quantity of material to be removed. However, the excavation boundaries are constrained on all sides and there is thus a limit to how far excavations can expand.

Additionally, there are nine large concrete foundations that are placed at various intervals through the entire excavation area. These concrete foundations and the unused rail tracks will be removed to the extent feasible, at the time of excavation, so that the impacted soils can be removed as efficiently as possible. The rock blotter rock will be removed together with the waste soil and not attempt to salvage it. At this time it is not considered cost effective to attempt to segregate and stockpile the rock, test it for contamination, and move it to new locations.

To assure that the surrounding features are supported properly, the sidewalls of the excavation will need to be benched or sloped as specified in Title 8 California Code of Regulations, Sections 1539 -1543 in order to prevent and protect the construction workers from trenching and shoring hazards. The southern boundary (former Power Units 1-5 Building) of the excavation will be set back from the building by five feet, and then sloped at a 1:1 to the bottom of the excavation. Similarly, the remaining boundaries of the excavation will be sloped at a 1:1 as required for geotechnical and/or structural considerations. If impacts are

observed extending towards the adjacent former Power Units 1-5 Building then engineering controls such as slot trenching will be used to protect the integrity of the structure as the excavation size increases. Conversely, if impacts are observed extending out towards the other adjacent areas, such as beneath the roadway along the north side of the Rock Blotter Area, engineering controls such as box shoring will be used as the excavation is expanded to remove those areas.

If rails and concrete footings are removed they would cease to be obstacles. If it is determined that there are no buried utilities, or that they may be temporarily deactivated and protected, excavations may extend into paved areas as needed. An excavator will be used to remove and stockpile the impacted soils, a loader will be used to place soils into the end dump trucks for transport to the landfill, and a large sheep's foot roller will be used for compaction of the backfill material. In addition, a water truck or towable spray tank (water buffalo) will be dedicated to the project for dust suppression/minimization and waste hauling vehicles (i.e., end dump trucks) will be required for the safe and efficient completion of the project.

The Storm Water Management Plan includes placement of berms around the excavations using sand bags, in order to prevent surface runoff from entering or exiting the work area. These measures will be evaluated on a daily basis through the duration of the remedial activities.

Excavated soils will be stockpiled then loaded into end dump trucks. This material will be removed and disposed of by PG&E in accordance with State and Federal regulations. It is not anticipated that excavation activities will extend below groundwater. If significant groundwater is encountered, a pothole will be excavated in one corner of the excavation to create a deeper area for water to accumulate, which will facilitate removal by pumping. The accumulated water will then be pumped into a holding tank, sampled for characterization, and managed in accordance with applicable State and Federal regulations. Excavation work will be able to continue during this process. Any saturated soils that are excavated will be temporarily stockpiled on plastic sheeting and barriers arranged so as to contain free water that drains out of the soil. The free water will be drawn off and combined with the groundwater in holding tanks. Upon draining off free water, the moist soils may be mixed with dry soils and loaded into trucks for transport and disposal.

Three levels of field screening will be performed in order to expedite decisions to stop excavation:

- Field Observations
- Field Screening using analysis kits, and
- Confirmation Sample Laboratory analyses

When full proposed excavation depths have been achieved, if field observations such as staining, discoloration, odor, or photo-ionization detector (PID) readings indicate no evidence of impacts, field screening testing will be performed. Field screening testing will be performed for TPH and PCBs using Hanby™ or equivalent field test methods. Soil screening test methods will comply with United States Environmental Protection Agency (U.S. EPA) - approved immunoassay methods SW4020 (PCBs) and SW4030 (petroleum hydrocarbons). If the field screening result is greater than a screening level (SSTL or ESL), then excavation will continue.

If field screening result is ND or less than the screening level, then excavation will be halted

temporarily at that location, and confirmation samples will be collected. Confirmation soil samples will be collected from the bottom and sidewalls of each pit and Confirmation sample analyses will be performed on a fast turn-around schedule (up to 24 hours) in order to expedite final determination of the limits of excavation. When it has been determined that all soil identified to contain contaminants of concern above the screening standards has been removed, the excavations will be backfilled with clean soil in accordance with engineering specifications.

Site Description:

MLPP is located east of the community of Moss Landing in Monterey County, California. It occupies approximately 236 acres east of State Highway 1 and north of Dolan Road. The site is bordered to the south by the Moss Landing Commercial Park facility (formerly National Refractories Mineral Corporation); to the north and east by pastures and undeveloped land around Elkhorn Slough; and to the west by Moss Landing Harbor. The current owner Dynegy took control of the facility in 2007.

The Facility is located near the Pacific Ocean at Monterey Bay, Elkhorn Slough, Moss Landing State Beach, Salinas River State Beach, Bennett Slough, Moro Cojo Slough, Old Salinas River, and Salinas River; farms and farmhouse residences, commercial and industrial businesses (former refractory brick manufacturing plant), restaurants, stores and shops which serve the community and the local tourist industry, commercial and private boat and ship docks and related marine service enterprises.

Rock Blotter Area in AOC PB 1-5

The Rock Blotter Area is located within AOC PB1-5 in the western portion of MLPP, just east of the administration building and north of Power Plant Units 1-5 building. The Rock Blotter Area measures 640 feet long by 50 feet wide and the portion which has been investigated measures approximately 365 feet long and 50 feet wide (Figure 3).

Previously, 16 large transformers were in use in this area. These transformers were used to transfer power between the two switch yards located onsite, just north of the Rock Blotter Area. In 1993, Mittelhauser Corporation was hired by PG&E to conduct a partial excavation to remove hydrocarbon impacted soils from the number five bank transformer area, which is located at the eastern end of the current investigation area. The excavation activities removed soils adjacent to the transformers from depths of up to 15 feet below ground surface (bgs). Due to the active transformers still being in place, the excavation was limited to accessible areas. The excavation activities are described in greater detail in the report titled *Bank 5 Soil Excavation Report, Moss Landing Power Plant* written by Mittelhauser in February 1994 (Mittelhauser, 1994). Nine transformers were removed from this area between 2004 and 2006. The concrete foundations for the removed transformers are still in place. An investigation at the site was conducted in July 2007 by Parsons as summarized in the report *AOC Power Block 1-5 Rock Blotter Assessment Moss Landing Power Plant Moss Landing, California* (Parsons, 2007). The investigation included direct-push soil borings for collection of samples to characterize the extent of petroleum hydrocarbons, polychlorinated biphenyls (PCBs), and metals within the investigation area. This IM Work Plan is based on the findings presented in the July 2007 (Parsons, 2007) report.

Site History:

Dynegy Moss Landing Power Plant is a permitted Resource Conservation and Recovery Act (RCRA) facility for the storage of hazardous liquids in their 3 surface impoundments. The majority of the hazardous waste that is stored in these surface impoundments is generated from boiler

cleanings within the facility power buildings. The surface impoundments have triple liner leachate collection and detection systems. There have been no leaks detected beyond the first liner of the leachate collection and detection systems. The facility permit was renewed on April 6, 2006 and will expire on April 6, 2016.

PG&E began operations in 1950 with three power generation units. In 1998, Duke Energy Moss Landing LLC (DUKE) assumed ownership and operation of MLPP. Duke Energy modernized the power generation operations to include combined cycle power generation units in 2002. Fuel Oil was burned to generate power before switching to natural gas. In May 2006, LS Power acquired Moss Landing Power Plant from Duke Energy and subsequently merged with Dynegy Inc. in April 2007.

Currently, MLPP operates four power generation units (Units 1, 2, 6 and 7) with a total generation capacity of 2529 megawatts (MW). The generated power for all four units is sent to the PG&E switchyards for distribution to the grid system.

The previous owner, PG&E performed a RCRA Facility Investigation of the entire site for soil and groundwater contamination from past practices implemented during their operation of the facility. PG&E performed extensive soil and groundwater testing for purposes of evaluating the sale of the property and on October 27, 1997 submitted a Phase II Environmental Site Report entitled "Phase II Environmental Site Assessment - Pacific Gas and Electric Company, Moss Landing Power Plant, Moss Landing, California" (Phase II Report), dated July 1997. The Phase II Report identified potential locations of soil and groundwater impact. The Phase II Report is equivalent to a Current Conditions Report and was reviewed and accepted by DTSC on May 15, 2002.

Power Blocks 1 through 5 are inactive and PG&E has been working with DTSC and Dynegy, the current facility owner. PG&E continues to address the environmental liabilities from their past operations at the site.

ORGANIZATION OF THIS DOCUMENT

Attachments A and B provide a list of references used in preparing the Initial Study and a list of the acronyms and abbreviations the reader will encounter in the text. Figures cited throughout the document are included at the back, in Attachment C.

Each of the Impact Categories addressed in the Initial Study starts with a bulleted list of "Project Activities Likely to Create an Impact." These identify the elements of the proposed project that would be likely to affect sensitive or significant resources *if such resources were present*. The presence or absence of sensitive resources and analysis of potential project effects upon them is then described in a checklist format in each of the 16 subsections.

Measures to avoid or reduce all potential adverse effects to a less-than-significant level have been incorporated into project planning and design. These "avoidance and minimization measures" are described in the applicable subsections

ENVIRONMENTAL IMPACT ANALYSIS:

1. AestheticsProject Activities Likely to Create an Impact:

- Removal of rock and concrete hardscape

Description of Baseline Environmental Conditions:

The Moss Landing Power Plant (MLPP) has been used for power generation since its inception in 1950. MLPP is located on a 380-acre site near Monterey County coastline, east of the community of Moss Landing and within the Coastal Zone. The plant is located inland from the Moss Landing Harbor in an area of light industry, agricultural lands, recreational beaches and tidal wetlands. The Elkhorn Slough National Estuarine Research Reserve borders the northern site boundary and agricultural lands are located to the east of the site. Highway 1 extends along the western site boundary which is identified as an eligible state scenic highway, not officially designated (Caltrans 2009). The boilers, generators and smokestacks partially obstruct scenic views of Elkhorn Slough from Highway 1 and the community of Moss Landing. The smokestacks are prominent visual features in views along the coast and inland as they are the tallest structures in this part of the coastal zone and they create a high contrast with surrounding natural landscape features.

The MLPP is located within the Coastal Zone, as defined by the North County Land Use Plan and Local Coastal Program (Monterey County 1982b). The Local coastal Program contains policies that encourage the protection of views of the Moss Landing community, harbor and dunes from Highway 1. The proposed project would not adversely affect scenic views from Highway 1 and it would not be inconsistent with Local Coastal Program Policies. Therefore, the impact on scenic vistas and highways would be less than significant.

The Monterey County Draft General Plan, Land Use Element (Monterey County 2001) provides a guide to land use planning and identifies how land will be used in the future. The following goals expressed in the Land Use Element also are related to aesthetic qualities of the local environment:

- Preserve and enhance the quality of existing Community Areas.
- Maintain community identity.
- Preserving natural areas and conserve historic structures and places.

The Rock Blotter Area is a small area within the confines of MLPP, located within AOC PB1-5 in the western portion of MLPP. The Rock Blotter Area is east of the administration building and north of the former Power Generation Units 1-5 building. The Rock Blotter Area is where previously 16 large transformers were used to transfer power between the two switch yards located onsite, just north of the site. Other MLPP operations and features are present between the project site and the MLPP boundaries such that work at the project site would not affect vistas.

Analysis as to whether or not project activities would:

- a. Have a substantial adverse effect on a scenic vista.

Impact Analysis:

MLPP is located on a 380-acre site located near the Monterey County coastline, east of the community of Moss Landing and within the Coastal Zone. Facilities on the site include boilers, turbine engine generators, and associated facilities, which are industrial in appearance. The plant is located inland from the Moss Landing Harbor in an area of light industry, agricultural lands,

recreational beaches, and tidal wetlands. The Elkhorn Slough National Estuarine Research Reserve borders the northern site boundary, and agricultural lands are located to the east of the site. Western site boundary is adjacent to Highway 1 which is identified as an eligible state scenic highway, not officially designated (Caltrans 2009). The boilers, generators, and smokestacks of the existing Moss Landing plant partially obstruct scenic views of Elkhorn Slough from Highway 1 and the community of Moss Landing. In addition, the smokestacks, which are the tallest structures in this part of the coastal zone, create high contrast with surrounding natural landscape features, which differ markedly in scale, form, colors, and textures, and are prominent visual features in views along the coast and inland. Majority of the site is paved and devoid of vegetation however, there are clusters of mature trees located primarily in the eastern portion of the site.

The Rock Blotter Area is a small area within the confines of MLPP, located within AOC PB1-5 in the western portion of MLPP. Other power plant operations and features are present between the project site and the MLPP boundaries such that work at the project site would not affect vistas. As a result, the proposed project is not expected to have any impact on the scenic vista and the aesthetic conditions of the general vicinity.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.

Impact Analysis:

Project-related activities will occur entirely within the confines of the Site. The nearest officially designated state scenic highway, Highway 156, lies approximately 2 miles north-northwest southwest of the Site. Also, Highway 1 extends along the western site boundary. However, the section of Highway 1 adjacent to MLPP is identified as an eligible state scenic highway, not officially designated. Although the proposed interim measures would result in aesthetic changes at the Site itself, no scenic resources would be affected by the proposed activities. (Caltrans 2009)

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact Analysis:

Project-related activities will occur entirely within the fenced site which involves excavation of contaminated soil from beneath Power Block Units 3, 4 and 5 in the Rock Blotter Area; followed by disposal offsite. The visual characters of the project site location include a former concrete power block building on one side and a fenced switchyard on the other. As a result, after completion of the proposed project, the visual character of the site will have changed for better at the project location. However, the project will have a no impact on the visual character of the site and its surroundings.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Impact Analysis:

MLPP operations include industrial lighting throughout the year, for security and operational reasons. Also, there is typical small commercial and residential lighting from the town of Moss Landing as well as marine vessel lighting in Moss Landing Harbor. The proposed corrective action activities will not require additional levels of lighting although it is conceivable to have possible changes in the placement of lighting while excavation is in progress (e.g. permanent to temporary). Following completion of the corrective action activities, nighttime lighting will still be necessary for site security; however no new sources of substantial light or glare will be added to the Site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

2. Agricultural Resources

Project Activities Likely to Create an Impact:

Implementation of the Interim Measures would not affect agricultural resources. All proposed activities would be restricted to the project location within the confines of MLPP 236-acres industrial Site and the transportation corridors leading in and out of the Site.

Description of Baseline Environmental Conditions:

MLPP Site is situated entirely within an area defined as “urban and built-up land” in the California Department of Conservation’s *Monterey County Important Farmland 2006 and Urbanization 1984-2004* (DOC 2006). Prime Farmland, Unique Farmland and Farmland of Statewide Importance are located directly north of MLPP.

The DOC defines Urban and Built-up Land as, “occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.”

“Prime Farm Land” is land with best combination of physical and chemical features that are able to sustain long term agricultural production. This land has soil quality, growing season and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date (DOC 2006).

“Farmland of Statewide Importance” is similar to Prime Farm Land but with minor shortcomings such as greater slopes or less ability to store soil moisture (DOC 2006).

“Unique Farm Land” consists of lesser quality soils used for the production of the state’s leading agricultural crops. This land is usually irrigated but may include non irrigated orchards or vineyards as found in some climatic zones in California (DOC 2006).

Analysis as to whether or not project activities would:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

Impact Analysis:

The project is limited to excavation of contaminated soil within the confines of MLPP, an existing industrial site within “urban and built-up land” as defined by the California Department of Conservation (DOC 2006). No land conversion will be necessary for project implementation.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

Impact Analysis:

Agricultural Conservation land is located immediately north of MLPP and the closest Williamson Act parcel is located approximately one mile north of MLPP. The project Site is limited to an existing industrial facility within an urban zone and all project activities would be consistent with existing zoning (Monterey County, 2007).

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

Impact Analysis:

As noted in Sections 2(a) and 2(b), above, the project is limited to excavation of contaminated soil from an existing industrial site within “urban and built-up land” as defined by the California Department of Conservation (DOC 2006). The proposed project activities would neither require nor contribute to any changes in zoning or farmland conversion.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

3. Air Quality

Project Activities Likely to Create an Impact:

- Soil Excavation
- Construction equipment
- Vehicles including personnel and trucks hauling excavated soils

Description of Baseline Environmental Conditions:

MLPP is located within the North Central Coast Air Basin (NCCAB) under the jurisdiction of Monterey Bay Unified Air Pollution Control District (MBUAPCD). NCCAB encompasses a three-county region of Monterey, Santa Cruz and San Benito Counties and covers an area of 5,159 square miles. The project location is the most notable landmark in Moss Landing and is visible on a clear day from as far away as Santa Cruz, California to the north and Monterey, California to the south.

The CEQA Air Quality Guidelines (MBUAPCD 2008) provide thresholds of significance for criteria pollutants, toxic air emissions, and odors for both the construction and operational phases of a proposed project. Criteria pollutants measured against federal and California ambient air quality standards in the project vicinity include ozone and PM₁₀ (particulate matter less than 10 micrometers in size). The Watsonville monitoring station has been in attainment for ozone and PM₁₀ since 2000 under federal and state standards (<http://www.arb.ca.gov/aqd/aqdpge.htm>).

Analysis as to whether or not project activities would:

- a. Conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis:

MBUAPCD is responsible for enforcing the area's air quality plan. If the proposed project does not exceed the MBUAPCD thresholds of significance for emissions, then it will not conflict with or obstruct implementation of the air quality plan. The following analyze emissions from the project to determine if they exceed the thresholds of significance.

The project involves excavation of contaminated soils, and transportation of soils characterized as hazardous waste to a licensed and permitted facility for disposal. The site is paved at the project location and the area to be excavated is covered with rock blotter and concrete blocks. All roads and streets used to access the site are paved. Criteria pollutants and toxic air emissions may be emitted from the Site by project activities and will require application of Best Management Practices including dust, vapor and odor suppression, as well as standard health and safety protocols for the protection of the industrial worker and the surrounding human and natural environment.

Dust and chemical suppressants should effectively eliminate any PM₁₀ or other fugitives during excavation/handling. Additionally, stockpiles are to be covered and a cease-work will be observed with winds in excess of 15 miles per hour. Therefore, the potential exposure to the public from remediation activities onsite would have a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Impact Analysis:

Estimates of the amounts of criteria pollutants (airborne particulate matter [PM₁₀], nitrogen oxide [NO_x], and volatile organic compounds [VOCs]) produced during soil excavation activities were made. Emissions estimated for site activities (assuming 8 hour working days and two 2005 or newer 50HP diesel excavator with a load factor of 0.65) using CEQA Air Quality Guidelines (ARB 2008) are:

- PM₁₀ 38 lb/day
- NO_x: 60 lb/day
- VOC 0.32 lb/day
- CO 3.6 lb/day

NO_x and VOC emissions were calculated even though calculations for construction equipment are not necessary because temporary emissions are accounted for in the federal and State plans. These on-site emissions anticipated during the proposed project activities; are well below the PM₁₀, NO_x, and VOCs threshold quantities of 82 lb/day, 137 lb/day, and 137 lb/day, respectively, for these criteria pollutants (ARB 2008).

The project would add a maximum of 10 commute vehicles per day to the local traffic for a 3 month period. Also, approximately 20 delivery trucks will add to the local traffic for about 20 days during this 3 month period of proposed project activities. The intersection that would probably realize the highest CO concentrations is Highway 1 and Dolan Road. Dolan Road, located south of MLPP, carries approximately 3,300 vehicles per day. MLPP access points are primarily along Dolan Road. Highway 1 traverses along the coast, west of MLPP, and carries approximately 37,500 vehicles per day (ICF Jones & Stokes, 2008). Calculations assume that all of the additional project-related traffic would pass daily through this intersection in route to the project site. Emissions estimated for load hauling trucks and transportation to and from site in passenger vehicles, were calculated based on mileage and number of vehicles (ARB 2008) and compared to the emissions in Monterey County.

Emissions (pounds/day)	PM ₁₀	NO _x	VOC	CO
Medium Heavy-Duty Trucks				
Project site	0.0835	2.126	0.0683	0.630
Monterey County (2008 Average)	0.0836	2.126	0.0684	0.630
Light Duty Passenger Vehicle				
Project site *	0.041	0.614	0.616	6.728
Monterey County (2008 Average)	0.0033	0.0495	0.0496	0.5421

* 500 miles per day for 10 vehicles commuting 50 miles

Daily emissions for medium heavy-duty Trucks were similar to the average daily emission for the same in Monterey County for 2008 (ARB 2008). Daily emission calculations for passenger vehicles due to the proposed project were based on an assumption that 10 personnel vehicles will

commute 50 miles per day. Monterey County average emissions for passenger vehicles for 2008 were based on average number of miles driven per day and the total number of vehicles per day. The ambient air standard for CO concentration averaged over 8 hours is 9 parts per million (ppm) for both federal and State of California. For averaging over 1 hour, the standard is 35 ppm for federal and 20 ppm for the State of California. The calculated concentrations at the key project intersection were all well below these standards. Implementation of the project will therefore have a less than significant impact on air quality as measured by CO concentrations.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Impact Analysis:

The area has been in has been in attainment for ozone and PM₁₀ since 2000 under federal and state standards (<http://www.arb.ca.gov/aqd/aqdp.htm>).

The proposed project will add approximately 0.5 lb/day of PM₁₀ to the atmosphere. This small increase of 0.5 lb/day relative to the large threshold of significance will not result in a considerable net increase to cause non-attainment of criteria pollutant PM₁₀. Remediation activities will require application of Best Management Practices including dust and vapor suppression, as well as standard health and safety protocols for the protection of the industrial worker and the surrounding human and natural environment. Therefore the project will cause a less than significant impact on PM₁₀ atmospheric concentrations in the area.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis:

The proposed project will emit less than significant amounts of criteria pollutants and therefore will not cause substantial criteria pollutant concentrations. Therefore, the proposed project will not expose sensitive receptors to substantial pollutant concentrations.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Create objectionable odors affecting a substantial number of people.

Impact Analysis:

The proposed project involves excavation and removal of impacted soils within the confines of MLPP. Therefore, objectionable odors (if any) do not have the potential to expose the public and would not have a significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

f. Result in human exposure to Naturally Occurring Asbestos

Impact Analysis:

The project has no potential for encountering Naturally Occurring Asbestos.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

4. Biological Resources

Project Activities Likely to Create an Impact:

- Noise-producing excavation concrete pad removal activities
- Generation of airborne particulate matter (e.g. PM₁₀)
- Temporary increases in vehicle traffic

Description of Baseline Environmental Conditions:

The MLPP is an industrial site with a mixture of concrete/paved areas, gravel-covered areas, and disturbed open space. The western portion of MLPP contains industrial facilities and is primarily covered with asphalt or concrete. The project site is within the confines of the MLPP; which is mostly paved and surrounded by power plant structures. There are no habitats with species of concern at or in the immediate vicinity of the proposed project site and thus there is no ecological risk. Aerial photograph of the project site and the Moss Landing 7.5 minute U.S. Geological Survey topographic quadrangle was reviewed by a biologist. Also, records search of the California Natural Diversity Database (CNDDDB) was conducted for occurrences within a 5 mile radius of MLPP which includes the AOC PB 1-5. Furthermore, a field survey was conducted to identify wildlife species on the site (CNDDDB 2006). All of the sensitive plant species found in this region are approximately 2 miles from the MLPP, except one – the Saline clover is found approximately 0.5 mile south of PB 1-5. All of the sensitive animal species found in presence of a suitable habitat are one-third of a mile away from the proposed project site.

The plant and animal species found in the general vicinity of Moss Landing are described in the following subsections.

Flora

Moss Landing lies within a unique area of the California coastline that includes marine, estuarine, fresh water, coastal marsh, dune scrub and disturbed (e.g., agricultural) habitats. Natural plant

communities that occur in the vicinity of Moss Landing include central dune scrub, northern coastal salt marsh, coastal brackish marsh, and coastal and valley freshwater marsh as listed in the California Natural Diversity Database (CNDDDB) of the California Department of Fish and Game (CDFG 2000). Stands of big-leaf maple (*Acer macrophyllum*), coast live oak (*Quercus agrifolia*), Monterey cypress (*Cupressus macrocarpa*) and Monterey pine (*Pinus radiata*) may be found in upland areas. Lowland and dune sand plant species include Monterey spineflower (*Chorizanthe pungens*), salt grass (*Distichlis spicata*) and sand gilia (*Gilia tenuiflora* ssp.).

Fauna

Moss Landing is located along the east-central portion of Monterey Bay. Monterey Bay is host to a diverse collection of resident and migratory marine mammals, birds and fish. Resident marine mammals include sea lions (*Enhydra lutris*), harbor seals (*Phoca vitulina*) and sea otters (*Enhydra lutris*). Migratory marine mammals include gray whales (*Eschrichtius robustus*) and humpback whales (*Megaptera novaeangliae*) that migrate past, and occasionally enter, the Monterey Bay. Resident birds include California brown pelican (*Pelecanus occidentalis*), least tern (*Sterna antillarum*) and cormorant (*Phalacrocoracidae*). Migratory birds include a variety of waterfowl including ducks and geese. Estuarine habitats in the vicinity of Moss Landing include Elkhorn Slough and the Elkhorn Slough National Estuarine Research Reserve (the Reserve). More than 400 species of invertebrates, 80 species of fish, and 200 species of birds inhabit or utilize Elkhorn Slough and the Reserve (MWH 2008). Elkhorn Slough is one of the largest coastal wetlands in California, and winds inland approximately seven miles. It serves as an important breeding ground for fish including elasmobranchs, such as the leopard shark (*Triakis semifasciata*) and bat ray (*Myliobatis californica*), and a variety of resident and migratory birds and mammals. Piscivorous birds that forage or roost within Elkhorn Slough include the great blue heron (*Ardea herodias*), cormorant, and California brown pelican. Waterfowl commonly present include a variety of ducks, pied-billed grebe (*Podilymbus podiceps*), and loon (*Gavia pacifica*).

A second wildlife preserve, the Moss Landing Wildlife Area, is located North of Elkhorn Slough, and east of Highway 1. The Moss Landing Wildlife Area is a State-designated Wildlife Area (WA), and consists of a series of ponds controlled by tidal gates. Those ponds nearest Elkhorn Slough provide a roosting site for California brown pelicans, and a pupping area for harbor seals (*Phoca vitulina*). The more northerly ponds host a breeding colony of western snowy plovers (*Charadrius alexandrinus nivosus*).

Threatened and Endangered Species

At least six threatened or endangered species utilize Elkhorn Slough and the Reserve, or upland areas adjacent to these water bodies. Threatened or endangered species include the peregrine falcon (*Falco peregrinus*), Santa Cruz long-toed salamander (*Ambystoma macrodactylum croceum*), California red-legged frog (*Rana Aurora draytonii*), California brown pelican, least tern and sea otter.

Federal Endangered Species Act (FESA)

The FESA, as amended, extends legal protection to plants and animals listed as “threatened” or “endangered” by the U.S. Fish and Wildlife Service (USFWS). The USFWS derives its regulatory authority from Sections 7 and 9 of the FESA, which prohibits the import, export, sale, taking or possession of any federally listed species of fish or wildlife. Listed species are those that are threatened or endangered (in danger of extinction throughout all or a significant portion of their range) and have been the subject of final regulation and listing in the Federal Register. Also represented are those species officially proposed for listing in a notice of the Federal Register. In addition to listed species, a second group of species is identified under the FESA. This group, known as (federal) candidate species or FCS, has not yet been the subject of a proposed or final ruling to become listed.

While not provided protection under the FESA, agencies are required to consider candidate species in their planning process (CDFG 2000).

California Endangered Species Act and Native Plant Protection Act

The California Endangered Species Act of 1984 and the California Native Plant Protection Act of 1977 are administered by the CDFG. These acts include rare, endangered, threatened and candidate species of plants and wildlife. Candidate species are those that have been accepted by the state for review and potential inclusion on the list of rare, threatened or endangered species. The rare designation applies to plants only and includes those plants that are not threatened or endangered, but that could become eligible to be listed as threatened or endangered due to decreasing numbers or further restrictions to habitat.

California also has identified plant and wildlife Species of Special Concern (SSC). These species are rare, restricted in geographic distribution or declining throughout their geographic range. Downward trends in distribution and population size have been documented for many plant and wildlife species over the last century. Where these patterns appear to be symptomatic of critical decline, the species may be recognized on various “watch lists” published by agencies and conservation groups. Sensitive species are to be considered in resource planning and management. These plant and wildlife species are considered candidates for state listing and are afforded protection from local destruction pursuant to California Environmental Quality Act (CEQA, §15380).

California Native Plant Society List

The California Native Plant Society (CNPS) maintains an inventory of rare, threatened and endangered plants of the state and lists the plants in one of five categories. Plants of List 1A are plants presumed extinct in California, List 1B plants are rare, threatened or endangered in California and elsewhere, and List 2 plants are rare, threatened or endangered in California, but more common elsewhere. Plants for which the CNPS needs more information are on List 3, and plants of limited distribution are on List 4 (CNPS 1994).

Monterey County General Plan

The Monterey County General Plan includes goals and policies to protect and maintain state's natural resources. In particular, the Natural Resources and Conservation Open Space Conservation section goal is “to retain the character and natural beauty of Monterey County by the preservation, conservation, and maintenance of open space within constitutional constraints.” The corresponding Policy is Open space land use designations shall be used as needed to preserve the physical and natural features contributing to the County's outstanding natural beauty.” (Monterey County 1995a)

Analysis as to whether or not project activities would:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis:

The proposed project will occur within the confines of MLPP and there is no viable ecological habitat onsite, as concrete, asphalt, gravel or buildings cover most of the Site. All of the access roads to be used for transportation of materials are also paved. All of the sensitive plant species found in this region are approximately 2 miles from the MLPP, except one – the Saline clover is found approximately 0.5 mile south of PB 1-5. As a result, the proposed project will not have a significant adverse impact on plant or wildlife species in the area, including candidate, sensitive or special status species. The Project will be implemented following Best Management Practices for

loading and unloading trucks within the boundaries of the facility, ensuring that the project will have negligible or no effect on offsite plant and animal life.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis:

Since the proposed project will occur entirely within the boundary of MLPP and AOC PB 1-5 has no riparian or other habitat for any species, the project-related activities will not affect any sensitive species or their habitats existing outside the project site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis:

The Storm Water Management Plan will be implemented in order to prevent surface runoff from entering or exiting the work area. Any water within the excavated area will be pumped and stored in appropriate containers for profiling prior to disposal at an appropriate treatment or disposal facility. Elkhorn Slough, Moro Cojo Slough and the Moss Landing Harbor are in the vicinity of MLPP. Since the proposed project activities would be confined entirely within the confines of MLPP, excavation and soil removal activities will have no effect on federally-protected wetlands.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Analysis: (Next page)

The proposed project will occur entirely within the confines of MLPP where no wildlife habitat or wetlands are present. As a result, project-related activities will have negligible or no impact on wildlife.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Analysis: (next page)

The proposed project will occur entirely within the confines of MLPP and there are no trees in AOC PB 1-5. Therefore proposed project will not affect any plant, or biological resources under Monterey County Code Title 16, Environment.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Impact Analysis:

The County of Monterey Draft General Plan identifies areas in the vicinity of MLPP as Agricultural Conservation land use (north of MLPP) and Resource Conservation Land Use (east and southeast of MLPP). However, the project site location within MLPP does not coincide with these locations (Monterey County 2001). The proposed project will occur entirely within the confines of MLPP and will not affect any plant, fish, or wildlife habitat, and it will not conflict with or significantly affect any protective policies, ordinances or habitat conservation plans.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

5. Cultural Resources

Project Activities Likely to Create an Impact:

- Excavation and removal of contaminated soil from the project site.

Description of Baseline Environmental Conditions:**Archaeological Resources**

There are a few previously recorded pre-historic sites within the vicinity of MLPP. All of these pre-historic sites were discovered along the coast, west of Highway 1 where the Elkhorn Slough connects the Moss Landing Harbor. The closest site is identified as CA-MNT-229 and is located approximately a quarter mile northwest of the project site (Duke 1999a). Material observed at the CA-MNT-229 site in Moss Landing consisted of shellfish, stone tools, non-fish bone, and fish bone (CEC 2000b).

On February 2 and 25, 1999, Archaeological Consulting archaeologist Mary Doane completed an on-site pedestrian survey of the accessible portions of the Area of Potential Effects (APE). Soil visibility in the northwest portion of MLPP provided evidence of archaeological site CA-MNT-229. Survey of the other accessible portions of MLPP showed no evidence of cultural material (Duke Energy 1999b).

On May 7, 1999, Duke Energy Moss Landing LLC filed an Application for Certification (AFC) seeking approval from the California Energy Commission (CEC) to construct and operate the proposed 1,060-megawatt (MW) Moss Landing Power Plant Project. The CEC as the lead agency under the California Environmental Quality Act (CEQA) certified regulatory program, performed environmental analysis of the project, including an analysis of alternatives and mitigation measures to minimize any significant adverse effect the project may have on the environment. As functionally equivalent to the CEQA process, the CEC's siting process included evaluation of cultural resources. The CEC permitted MLPP project involved relocation of the traveling screens for the water intake structures, which were adjacent to the CA-MNT-229 site. The CEC approved permit allowed for the work and included conditions to be protective of the known cultural resources and any unknown cultural resources which may be encountered during construction. These conditions included use of an archeologist to ensure that cultural resources were not disturbed.

The current PG&E proposed soil removal action project location is within the confines of the MLPP site and is far from the CA-MNT-229 site.

Paleontological Resources

Although, the coastal sand terrace deposits may contain fossils near the site, none are known to have been encountered at the site. However, the coastal terrace deposits are considered to be paleontologically moderate in sensitivity due to the discovery of a mammoth bone in the deposit near Watsonville. The geologic features of Moss Landing - the basin sediments, coastal dunes, the beach dunes, and the wind blown sand deposits and fill also make for a low paleontological sensitivity. No paleontological resources have been identified in the vicinity of MLPP to this date.

Historical Resources

Moss Landing has no sites listed on the National Register of Historic Places; however, there are six Historic districts in Monterey County that are on the National Register of Historic Places (Monterey 1982a).

Analysis as to whether or not project activities would:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Impact Analysis:

The proposed project will be implemented entirely within an existing industrial site that post-dates the historic period and therefore will not affect the significance of any historical resources.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

Impact Analysis:

There are a few previously recorded pre-historic sites within the vicinity of MLPP. All of these pre-historic sites were discovered along the coast, west of Highway 1 where the Elkhorn Slough connects the Moss Landing Harbor. The site identified as CA-MNT-229, is the closest and is located about a quarter mile to the northwest of the project site (Duke 1999a). The proposed project involves soil removal action at a location within the confines of the MLPP site covered with concrete and is far from the CA-MNT-229 site. Although, cultural resources are not expected to be present at the proposed project site, DTSC will require PG&E to train field staff to identify potential cultural resources. DTSC will also require PG&E to have field protocols for stopping work and contacting an archeologist; should artifacts be encountered at the proposed project site.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact Analysis:

The geologic features of Moss Landing have a low paleontological sensitivity. No paleontological resources have been identified in the vicinity of MLPP and therefore the project has no potential to affect any paleontological resources.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- d. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis:

No human remains have been discovered at the project Site. The proposed project will be implemented entirely within an existing industrial site and therefore the project has no potential to affect any human remains.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

6. Geology and Soils

Project Activities Likely to Create an Impact:

Excavation of contaminated soils, concrete pads and rock blotter from AOC PB 1-5, Rock Blotter Area

Description of Baseline Environmental Conditions: (Next Page)

The following information is based on available published and unpublished maps and literature, pertinent site-specific studies, Human Health and Ecological Risk Assessment Work Plan (MWH 2006)

Regional Geology

The 239-acre MLPP site is located inland approximately one-quarter mile from the edge of the Pacific Ocean adjacent to Monterey Bay in Central California. Forming a barrier from the Central Valley, the Coast Ranges lie several miles to the east. The MLPP is located at the western end of the Salinas River Basin, within the hydrogeologic sub basin designated as the "Salinas Sub basin" by the U.S. Geological Survey (USGS). The basin is underlain by a thick series of westerly dipping beds of sand, silt, and clay. Granitic outcrops are exposed about 8 miles east of the power plant where the land surface rises in elevation to 600 feet. These outcrops form the base of water bearing sand, silt, and clay beds which thicken to a depth of 3000 feet near the site (FD-GTI, 1997a; 1997b). The facility is located in the coast Range Geologic Province in a seismically active area on the boundary between the Pacific and North American tectonic plates. Two active strike slip faults are located near the MLPP; these include the San Andreas Fault, which lies approximately 11 miles northeast of the MLPP, and the San Gregorio-Hosgri Fault, located approximately 16 miles to the southeast. The closest fault to the MLPP is the inactive Monterey Canyon Fault that lies approximately 5 miles offshore, west of the MLPP (FD-GTI, 1997a; 1997b).

Local Geology

The site is bounded by the Moss Landing Harbor to the west, the Elkhorn Slough and the Elkhorn Estuarine Research Reserve to the north, agricultural lands to the east and the Moro Cojo Slough to the south (CPUC 1997). The power plant site is relatively flat with an elevation of approximately 30 feet above mean sea level. In 1986, the Federal Emergency Management Agency determined that the site was outside the 100-year flood plain (Duke Energy 1999a). The site is underlain by a thick series of westerly dipping beds of sand, silt and clay. Major soil types in the project area include Elkhorn fine sandy loam, Oceano loamy sand, Santa Ynez fine sandy loam, and Dune land. While Dune land is highly susceptible to wind-induced erosion, the other soils are reported to have only a slight to moderate erosion hazard rating to wind-induced soil erosion. Some artificial fill has been deposited on the site consisting of clayey sands and native silty sands in the upper 3-12 feet below grade (PG&E 1996). Land uses in the vicinity of MLPP include agriculture (cattle grazing, cropland), open space/wildlife habitat (including Elkhorn Slough National Estuarine Research Reserve), and marine-related uses. The site is currently zoned heavy industrial by the Monterey County General Plan.

FAULTING AND SEISMICITY:

No active faults are known to cross the proposed power plant footprint or the Pacific Gas and Electric substation located adjacent to the site. The potential of surface rupture on a fault at the power plant footprint is considered to be very low, since no faults are known to cross the proposed power plant location. The site is located in CBC seismic zone 4. This calls for minimum ground acceleration for a project within the zone to be designed to 0.4g (0.4X 9.8 meters per second per second). The closest known fault to the power plant footprint is the Monterey Canyon fault. This fault is located approximately 1 mile west of the site. It is not considered to be an active fault. However, if a major earthquake occurs on the eastern end of the fault, the project site may experience surface rupture and strong ground shaking should the fault be propagated through the project site. The closest active fault to the site is the Zayante-Vergeles fault which is located approximately 6 miles east-northeast of the fault. This fault is considered to be a minor part of the San Andreas Fault System.

Site Soils (Next Page)

The ground surface around the site is generally level and sits at an approximate elevation of 20 feet above mean sea level (msl). Fill material consisting of clayey sand and silty sand is encountered from the surface to between three and seven feet bgs in the northwestern portion of the MLPP site and in low lying areas west of the site near Moss Landing Harbor. Below the fill, or where the fill does not occur, the sediments generally consist of silty sand and sand to a depth of approximately 9 feet to 15 feet bgs. The ground surface of the Rock Blotter Area consists of coarse granitic rock fragments of cobble to gravel size. The rock fill thickness varies from approximately 3 feet thick at the east end to as little as 1½ foot thick at the west end of the Project site.

Analysis as to whether or not project activities would:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - Landslides.

Impact Analysis:

There are no active faults are known to cross the MLPP site or the Pacific Gas and Electric substation located adjacent to the site. There is no evidence that any active or potentially active faults are located beneath the site. Therefore, the potential for fault-related ground rupture is low. Due to the presence of numerous faults in the project region, there is a moderate to high potential that the site will experience ground shaking over its lifetime during an earthquake. The site area is relatively flat and has been previously graded. Thus, the potential for landslides is low.

The project activity involves excavation and removal of contaminated soils, concrete pads and rock blotter from the site and exposure of people or structures to potential substantial adverse effects due to an earthquake will be less than significant.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Result in substantial soil erosion or the loss of topsoil.

Impact Analysis:

The site is predominantly covered with coarse granitic rock fragments of cobble concrete or asphalt. The proposed project involves excavation of contaminated soil, backfilling the excavations with clean soil and compacted in accordance with engineering specifications. Therefore, soil erosion from water or wind due to implementation of the proposed project will be less than significant.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated.

- Less Than Significant Impact
 No Impact

- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Impact Analysis:

At the project site location which is located in the northwestern portion of MLPP; fill material consisting of clayey sand and silty sand is present from surface to between 3 and 7 feet below ground surface. Below the fill, or where the fill is not encountered, the lithology is silty sand and sand. These materials are not considered unstable and will not become unstable as a result of the soil removal action project. Therefore, the potential impact of unstable soil on the project is less than significant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact Analysis:

Based on work previously performed at MLPP, soil in the vicinity of the soil removal action project has not been identified as expansive soil. The impact of expansive soil on the proposed project is expected to be less than significant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of water.

Impact Analysis:

Wastewater generated by the proposed project activities will be collected and characterized prior to their disposal offsite. Therefore, there will be no impact from the proposed project activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Be located in an area containing naturally occurring asbestos

Impact Analysis: (Next Page)

MLPP is not located in an area containing naturally occurring asbestos and the project therefore has no potential for encountering Naturally Occurring Asbestos.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

7. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

- Excavation of contaminated soil.
- Transportation of excavated soil and wastewater from decontamination of equipment, offsite.

Description of Baseline Environmental Conditions:

The MLPP is an industrial complex engaged in power generation and includes warehouse and office buildings, and related equipment. Currently, MLPP operates four power generation units (Units 1, 2, 6 and 7) with a total generation capacity of 2529 megawatts (MW). Operating Units 6 and 7 are steam turbine units with a total capacity of 1509 MWs. Operating Units 1 and 2 are combined-cycle units with a total capacity of 1020 MWs. The generated power for all four units is sent to the PG&E switchyards for distribution to the grid system. The proposed project consists of excavation of contaminated soils beneath the former transformer units 1 through 5 of the existing MLPP.

Analysis as to whether or not project activities would:

- a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

Impact Analysis:

The project is limited to excavation and removal of soil impacted with TPH and PCBs. Previous soil investigations found concentrations of TPH that range from 7,600 mg/kg to 630 mg/kg. Only two soil samples with detectable concentrations of one of the PCB compound Aroclor 1260 were found with concentrations of 0.15 mg/kg and .06 mg/kg respectively. All of the hazardous waste will be segregated from non hazardous waste and PCB contaminated soil will be stockpiled and segregated from the TPH contaminated soil. Confirmation samples will be collected and analyzed to profile all of the stockpiles before they are disposed offsite. It is anticipated that four types of wastes could be generated at the site:

- Recyclable construction debris: This debris category may include steel rails, rebar, and, to the extent possible, concrete rubble. Any concrete rubble to be removed will be sampled and tested to determine its disposition for off-site for disposal. If a local recycling facility is available then the recyclable debris will be transported to this facility via dump trucks. If a local recycling facility is not available, these materials will be transported to a landfill that handles inert materials. If these materials are contaminated at non-hazardous levels, they will be disposed in a PG&E-approved Class II Landfill.
- Non-recyclable construction debris: This debris includes weeds, trash, wood, and discarded personal protective equipment that has not been contaminated. The non-recyclable construction debris will be placed in onsite dumpsters and transported to the local landfill via dump trucks.

- Contaminated Soil / Personal Protective Equipment (PPE): This material will be generated during excavation activities and may include soil/gravel/cobbles and PPE contaminated with TPH and PCBs. Soils confirmed by testing to be non-hazardous will be transported to and disposed of at a PG&E-approved Class II landfill. Any excavated soils that are characterized as hazardous will be disposed of at an approved hazardous waste facility
- Wastewater: water generated during remediation, including but not limited to, groundwater pumped out of excavations, and decontamination liquids will be temporarily placed inside 55-gallon DOT-approved drums or an onsite aboveground storage tank (i.e. Baker Tank). All wastewater generated in the course of the work will be characterized and managed in accordance with applicable State and Federal regulations.

Any other waste identified during the site remediation will be properly characterized and transported offsite to an appropriate waste management facility in compliance with applicable Federal, State and local regulations.

Transportation and disposal of any hazardous materials will be short-term activities with specific controls as described above. Therefore the proposed project activities will have less than significant impact.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact Analysis:

Project activities will be conducted in compliance with the approved work plan, and a Health and Safety Plan will also be required for the protection of site workers. There is a potential for an accident during offsite transport of excavated soil, wherein contaminated soil could spill onto public roads. However, this potential is low and containment/cleanup of such a spill would be effective as the soil is a solid material not prone to quick dispersment. Also, the proposed project activities are planned during dry weather months. Wastewater generated by the proposed project activities is expected to be less than 1000 gallons and will be characterized before it is transported offsite for disposal. In the event there is an accident, trained personnel will carry out the provisions of an Emergency Preparedness Plan to prevent, detect, and address any accidents involving the release of hazardous material.

Excavation

Excavation will be performed in stages with building set backs, benching, and sloping designed to protect existing facilities. Shoring of excavation walls will be used, if necessary, to allow removal of impacted soil that requires steepening of slopes greater than 1:1. Soil will be removed in stages and placed in stockpiles underlain and protected by plastic sheeting. Upon completion of profiling analyses for landfill acceptance, the soil will be loaded into dump trucks and hauled to an appropriate landfill for disposal.

Transportation (Next Page)

California law governing the transportation of hazardous materials and waste is contained in Division 20, Chapter 6.5, Article 6 and Article 13 of the California Health and Safety Code (H&SC). Regulations implementing this statute are found in Title 22, Division 4.5, Chapter 13 of the California Code of Regulations (CCR). In addition, the California Vehicle Code, California Highway Patrol Regulations (13 CCR), and the California State Fire Marshal Regulations (19 CCR) also apply to the transportation of hazardous materials and waste.

The H&SC and its regulations require that a transporter of hazardous waste hold a valid registration issued by the DTSC, and liability insurance. A Uniform Hazardous Waste Manifest signed by the generator and transporter must be in the transporter's possession, and hazardous wastes can only be delivered to authorized facilities. If a release occurs during transportation, the transporter must take immediate action to protect human health and the environment. Vehicles and containers used to transport hazardous waste must be in sound condition and designed to contain hazardous waste. DTSC administers and insures compliance with the H&SC and its regulations that apply to transportation of hazardous materials and waste.

California Vehicle Code sections 31301-31309 control, among other things, the routes that vehicles use in transporting hazardous materials and wastes. The California Highway Patrol is responsible for enforcement of these sections of the Vehicle Code.

Offsite Release

There is the potential for a release to occur as a result of a truck accident. Most of the materials shipped from MLPP would consist of contaminated soil and wastewater. Wastewater generated by the proposed project activities would be approximately 1000 gallons or less and will be shipped in tankers. Excavated soils would be transported via truck; and the trucks will be equipped to fully cover all soil and debris during transportation. At a minimum, the soil and debris will be tightly covered by a heavy tarpaulin. Excavated soils and other materials characterized as hazardous will be transported to a licensed and permitted facility.

Under existing procedures, a driver of any motor vehicle that transports hazardous materials must receive training that covers general awareness/familiarization with the duties, safety and function-specific aspects of the job, such as transport of hazardous waste. In addition, the driver must receive training on the safe operation of the motor vehicle that will be transporting hazardous materials Code of Federal Regulations (49 CFR 177.816) such as 24-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training course that meets the requirement of 49 CFR Part 172 Subpart G. The training includes proper maintenance of shipping papers and manifests, labels, placards and markings required for shipping, pre-transportation packaging, loading, transporting, unloading, and how to respond in the event of a spill, leak or other emergency.

The drivers are also required to receive training in the applicable requirements of 49 CFR Parts 390 to 397 (Federal Motor Carrier Safety Regulations) and the procedures necessary for safe operation of the motor vehicle. Training includes:

- Pre-trip inspection
- Use of vehicle controls and equipment, including emergency equipment
- Maneuvering in tunnels, on bridges and at railroad crossings
- General operation of the vehicle (safe turning, backing, braking, parking)
- Requirements pertaining to attendance of vehicle, parking, smoking, routing, incident reporting
- Loading and unloading materials (includes compatibility and segregation of cargo in a mixed load, package handling and securing).

Project activities involve excavation of contaminated soil and transportation offsite for disposal. In event of an accidental spill, containment/cleanup would be effective as the soil is a solid material not prone to quick dispersment. Also, trained personnel will carry out the provisions of an Emergency Preparedness Plan to prevent, detect, and address any accidents involving the release of hazardous material. Therefore; there is less than significant hazard to the public or the environment from the proposed project activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

Impact Analysis:

MLPP is not located within one-quarter mile of an existing or proposed school. Trucks carrying excavated materials and wastewater will be leaving the Facility via Dolan Road onto Highway 1. The route on Highway 1 will pass within one mile of Castroville Elementary School located approximately 1200 meters east of Merritt Street in Castroville. However, the possibility of a release of hazardous materials or waste from a truck is considered unlikely because the excavated contaminated soils and other materials will be tightly covered by a heavy tarpaulin and transported under hazardous waste manifest. The wastewater will also be transported to a treatment facility in tanker trucks following all applicable DOT regulations. There is less than significant hazard from the proposed project activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to public or the environment.

Impact Analysis:

MLPP facility is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact Analysis:

The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project area is located entirely within the existing MLPP facility and will not place structures, vehicles, or other objects within the pathway or route of an adopted emergency response or evacuation plan.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- f. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would result in a safety hazard for people residing or working in the project area.

Impact Analysis:

MLPP is not located within an airport land use plan. The nearest airport is Watsonville Airport approximately 10 miles north of MLPP and Marina Municipal Airport is approximately 12 miles south of MLPP. The proposed project is within the confines of MLPP and will result in a less than significant safety hazard for people residing or working in the project area and for persons in the surrounding area.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- g. For a project within the vicinity of a private airstrip, the project would result in a safety hazard for people residing or working in the project area.

Impact Analysis:

The proposed project site is not located in the vicinity of a private airstrip.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

8. Hydrology and Water Quality

Project Activities Likely to Create an Impact:

- Excavation of soil
- Offsite Disposal of possible contaminated Groundwater

Description of Baseline Environmental Conditions:

The proposed project is located at the existing MLPP site which is located about 12 miles northwest of Salinas, California in Monterey County at the intersection of Highway 1 and Dolan

Road in the community of Moss Landing. The plant is situated near the Moss Landing Harbor in an area that includes industrial facilities, agricultural lands, spare residences, recreational beaches and tidal wetlands. The site is bordered by Highway 1 and the Moss Landing Harbor on the west, Dolan Road and Moro Cojo Slough on the south, and Elkhorn Slough including the Elkhorn Slough National Estuarine Research Reserve to the north.

GROUNDWATER

Four water-bearing formations exist below MLPP. Forming the uppermost hydrologic unit, the marine terrace and alluvial deposits are of poor water quality and occur up to 200 feet below the surface. Aromas Reds Sands consisting of well sorted sands and gravels with thin clay interbeds is the major water-bearing unit in the area. This formation occurs between 200 to 800 feet below the surface with variable water quality. Below this formation is the Purisima Formation occurring at a depth of 800 to at least 1,200 feet. The lower-most hydrologic unit, Tertiary sediment, is comprised of consolidated marine sediments of sandstone, siltstone and mudstone underlain by granite bedrock. The tertiary sediment is of poor water quality and is characterized by high salinity. The groundwater table at the site occurs about 3.6 to 9 feet below the surface with flow converging from the northeast and southeast into a western trending potentiometric trough beneath the plant. The thick clay layer underlying Elkhorn Slough forms a major barrier to groundwater flows in the area. The groundwater gradient is relatively flat (0.0019 ft/ft to 0.0043 ft/ft).

SURFACE WATER

Surface water bodies in the vicinity of the project include Monterey Bay, Elkhorn Slough, Moro Cojo Slough and Moss Landing Harbor. Surface water and precipitation infiltration, irrigation return flows and water-bearing formations that underlie the uplands east of the plant are the major sources of groundwater recharge in the project vicinity (PG&E 1996; Duke Energy 1999a).

Site Ground Water and Surface Water

MLPP straddles two groundwater basins: the Pajaro Groundwater Basin and the Salinas Valley Groundwater Basin. The project site is located within the portion of MLPP within the Pajaro Groundwater Basin. Depth to groundwater at MLPP varies from 11 to 30 feet bgs; depth to groundwater beneath the project site is approximately 12 to 15 feet bgs.

Groundwater has historically been measured at depths of approximately 24 to 28 feet bgs in wells adjacent to the Rock Blotter Area. However, water was encountered in the one of the borings at depths of 12.5 to 15 feet. This shallower groundwater encountered in the borings may represent a perched water zone of limited extent. The groundwater flow direction is variable across the site, but in the western area, where the Rock Blotter is located, groundwater generally flows towards Moss Landing Harbor with an overall gradient of approximately 0.0002 foot/foot as described in Human Health and Ecological Risk Assessment Work Plan (MWH, 2006); Moss Landing Power Plant, Final Interim Measures Work Plan, AOC Power Block 1-5 Rock Blotter (Parsons, 2008).

WASTE DISCHARGE

Currently, the existing power plant has two structures for cooling water discharge. Outfall 001 (for the retired Units 1-5) discharges off the shore of Elkhorn Slough. Outfall 002 (for the operating Units 6 & 7) discharges into Monterey Bay with two vertical risers about 20 feet below the water surface (PG&E 1996; Duke Energy 1999a). PG&E's last NPDES Permit for the Moss Landing Power Plant was adopted by the RWQCB on February 10, 1995 (CA 0006254 Order No. 95-22, expiration date November 10, 1999). Stormwater runoff is currently discharged to Monterey Bay, Moro Cojo Slough, Elkhorn Slough or Moss Landing Harbor in accordance with an existing

Stormwater Pollution Prevention Plan and NPDES requirements. Wastewater generated by the proposed project activities will not be disposed under this NPDES permit.

Analysis as to whether or not project activities would: (Next Page)

- a. Violate any water quality standards or waste discharge requirements.

Impact Analysis:

The proposed project involves excavation and transportation of impacted soils beneath the former row of transformers that have been decommissioned. This proposed project activity will generate wastewater that will be tested before it is shipped offsite for treatment. The wastewater will not be discharged under the NPDES permit of the facility.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

Impact Analysis:

Depth to groundwater at MLPP varies from 11 to 30 feet bgs; depth to groundwater beneath the project site is approximately 12 to 15 feet bgs. It is not anticipated that excavation activities will extend below groundwater. However, if groundwater is encountered, a pothole in one corner of the excavation will be created to facilitate removal by pumping and the removed groundwater will be managed in accordance with applicable laws and regulations. There will be no significant impact to the supply of groundwater by implementation of the proposed project.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

Impact Analysis:

The proposed project involves excavation and transportation of impacted soils beneath the former row of transformers that have been decommissioned. Storm water will be managed using pre-determined plans to intercept and control flows into the excavation. Surface water runoff from MLPP drains to catch-basins located throughout the facility. The catch-basins drain to Elkhorn Slough, Monterey Bay, Moro Cojo Slough, and Moss Landing Harbor, as regulated by the MLPP NPDES permit. The proposed project activities are temporary and will be completed in less than 3 months time. Therefore, the drainage pattern of the site or area will not be substantially altered

and there will be a less than significant impact on erosion, siltation, or flooding, either onsite or offsite.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- d. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

Impact Analysis:

The project is limited to excavation of impacted soils and the excavations will be backfilled with clean soil in accordance with engineering specifications at the completion of the proposed project. The quality of storm water discharged from the site will not be degraded as a result of this project. Therefore, the impact to storm water discharge from implementation of the proposed project will be less than significant.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- e. Otherwise substantially degrade water quality.

Impact Analysis:

The proposed project will have no impact to the quality of water from the site.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- f. Place within a 100-flood hazard area structures which would impede or redirect flood flows.

Impact Analysis:

MLPP is not located in a 100-year flood zone.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- g. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact Analysis: (Next Page)

In the unlikely event that the site was flooded, people at the site would be able to evacuate in time. There are no dams or levees in the vicinity of the site whose failure would expose people or structures to a significant risk of loss, injury or death. The proposed project activities are temporary and will be completed in less than 3 months time. This project does not include any permanent construction onsite and therefore, the risk of loss, injury, or death to structures or people is not significant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

h. Inundation by seiche, tsunami or mudflow.

Impact Analysis:

As MLPP is located near Monterey Bay, there is potential for it to be impacted by a tsunami generated by an earthquake near the facility. A fault located just offshore in the Monterey Bay, the San Gregorio fault, would be the most likely cause of a Tsunami in the coastal regions of the Monterey Bay. This fault follows the coastline for approximately 100 miles and has had little recent activity. There are no lakes or reservoirs near the site that could cause a seiche that would inundate the site. Mudflows are not probable given the flat terrain of the area and the extensive paving of the surface at the site and in the vicinity. The proposed project activities are temporary and will be completed in less than 3 months. Also, the project activities do not include any permanent construction on site. Therefore, there will be no impact from inundation of the project site by seiches, tsunamis or mudflows.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

9. Land Use and Planning

Project Activities Likely to Create an Impact:

Implementation of the Interim Measures Work Plan would not affect land use or planning. All project activities will take place on property located within an area zoned for both light and heavy industrial use and the County plans to retain as such (Monterey County 2001).

Description of Baseline Environmental Conditions:

The Moss Landing Power Plant is located in the community of Moss Landing, about 12 miles northwest of Salinas. The power plant is situated across Highway 1 from Moss Landing Harbor in an area that includes ocean-dependent industrial facilities, agricultural lands, visitor-serving retail, limited residential, recreational beaches, and tidal wetlands. In North County, industrial uses are concentrated in Moss Landing (Monterey County 2001). In addition to the existing Moss Landing Power Plant, these industrial uses include fish and shellfish processing, boat building, and a Magnesia and refractory brick factory.

The Moss Landing Power Plant site is located at the intersection of Highway 1 and Dolan Road. The site is designated Heavy Industrial (Coast Dependent) by the North County Land Use Plan and the Moss Landing Community Plan. The site is zoned Heavy Industrial: HI (Coastal Zone [CZ]).

Existing land uses in the vicinity of the Moss Landing Power Plant site includes a 143- acre PG&E Moss Landing Switchyard. Zoning is HI (CZ), immediately north and adjacent to the power plant site. Further north is Elkhorn Slough and wetlands. To the west and across Highway 1 is Moss Landing Harbor. The harbor provides facilities for about 600 commercial and pleasure boats (Duke Energy 1999a). Commercial fishing industries, including canneries and fish processing companies, boat storage and repair facilities, marine supply stores, and other related facilities are located on Moss Landing Island (Monterey County, 1982a). Zoning is Light Industrial: LI (CZ). Immediately south of the site and across Dolan Road is the National Refractories magnesia and refractory brick facility. Zoning is HI (CZ). To the east and adjacent to the East Tank Farm portion of the site is the Dolan Industrial Park. Zoning is LI (CZ).

The nearest residence is located adjacent to the PG&E switchyard approximately 1,500 feet north of the existing Moss Landing Power Plant (Duke Energy 1999a). Zoning is Agricultural Conservation: AC (CZ). The nearest cluster of residential uses is located on Potrero Road about one mile southwest of the power plant site (Duke Energy 1999a). This residential area is separated from the site by the National Refractories industrial facility, Highway 1, Moro Cojo Slough, and a commercial area along Moss Landing Road. It is zoned Medium Density Residential (1 to 4 units per gross acre): MDR/4 (CZ). Another single residence is located south of the site near the intersection of Moss Landing Road and Highway 1. A small group of residences are located to the east within one-quarter mile of the MLPP East Tank Farm, off of Elkhorn Road. These residences are separated from the tank farm by agricultural uses (Duke Energy 1999a). Zoning is Rural Density Residential: RDR (CZ). Development density in this area ranges from 1 unit on 20 acres to a maximum of 1 unit per 5 acres. Nearby residential uses also include boats moored in Moss Landing Harbor and residents living on the Island.

Prime farmland is located approximately 1.7 miles from the Moss Landing Power Plant. Farmland of statewide importance is approximately 1.3 miles, and unique farmland is approximately 1.6 miles from the project site. There are no prime farmlands, farmlands of statewide importance, or unique farmlands located at the project site or within a one-quarter mile radius of the site (Duke Energy 1999a). Agricultural activity immediately to the north, and south (across Dolan Road) of the Middle and East Tank Farm portion of the Moss Landing Power Plant site is primarily cattle grazing (Duke Energy 1999a). The Calcagno Dairy Farm and several residences are located in the agricultural area to the north. Zoning designations include Coastal Agriculture Preserve (CAP [CZ]), and AC (CZ). Agricultural land to the south of Moro Cojo Slough and within one mile of the Moss Landing Power Plant site is planted in irrigated row crops, such as artichokes and brussel sprouts (Duke Energy 1999a). Zoning is AC (CZ) and CAP (CZ).

MLPP was constructed by PG&E and has been in operation since 1950. It is a 239-acre industrial complex that includes electric generation units, exhaust stacks, and various warehouse and office buildings.

Analysis as to whether or not project activities would:

- a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Analysis:

The proposed project would not affect current or proposed zoning. MLPP is zoned heavy industrial, with the exception of a small parcel of land located on the southeast portion of MLPP which is being considered for a Resource Conservation land use assignment by the county. The project site area is located in the northwest portion of MLPP; in a well defined industrial land use area.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact Analysis:

The project site is currently developed and is not within an area included in any habitat conservation plan or natural community conservation plan. The project will not affect ongoing activities at the nearby nature preserves, as project-related activities will occur only within existing Facility boundaries and the transportation corridors leading in and out of the Site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

10. Mineral Resources

Project Activities Likely to Create an Impact:

- Excavation of contaminated soil

Description of Baseline Environmental Conditions:

The primary mineral commodities currently mined in Monterey County which are of value to the State are sand, gravel, and petroleum. Non-metallic and metallic mineral mines are located north and south of MLPP, respectively, and the nearest oil well is located north of Elkhorn Slough. The closest designated Mineral Resource Zones (MRZ) classified as MRZ-1; are located near Castroville (southwest) and Pajaro (northwest). (Monterey County 2001)

MRZ-1 Classification is where adequate information indicates that no significant mineral deposits are present. MRZ-2 classification is applied to areas where adequate information indicates that significant mineral deposits are present. However, industrial areas (buildings and adjacent storage and parking facilities) are excluded from MRZ-2 designation based on economic exclusions.

Analysis as to whether or not project activities would:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Impact Analysis:

The proposed project activities are restricted within the confines of MLPP which is zoned as a Heavy Industrial site. The project will therefore have no impact on any mineral resources of the region.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Impact Analysis:

The proposed project activities are restricted within the confines of MLPP which is zoned as a Heavy Industrial site. The project will therefore have no impact on any mineral resources.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

11. Noise

Project Activities Likely to Create an Impact:

- Use of heavy equipment for excavation, loading and hauling of impacted soils
- Transportation of wastewater to an approved treatment facility

Description of Baseline Environmental Conditions:

Community noise levels are measured in terms of the "A-weighted decibel," or dBA. The A-weighting correlates overall sound pressure levels with the frequency response of the human ear. Several rating scales have been developed for measurement of community noise to account for: (1) parameters of noise that have been shown to affect humans, (2) the variety of noises found in the environment, (3) variations in noise levels that occur as a person moves through the environment and (4) variations associated with the time of day. The predominant community rating scale used in California to assess land use compatibility is the Community Noise Equivalent Level, or CNEL.

The CNEL scale represents a time-weighted 24-hour average noise level based on dBA. Time-weighted refers to the fact that noise levels during certain hours of the day are adjusted for people's increased sensitivity to noise during those hours. Five decibels (dB) are added to a noise level during the evening hours (7 p.m. to 10 p.m.), and 10 dB are added to the nighttime hours (10 p.m. to 7 a.m.). The day-night, or L_{dn} , scale is similar to the CNEL scale except that evening hour readings are not adjusted. A CNEL noise level may be reported as a "CNEL of 60 dBA," "60 dBA CNL," or simply "60 CNL."

Noise-Sensitive Land Uses

The proposed project activities will be within the confines of the existing MLPP facility involved in power generation. This facility, zoned for heavy industrial use, lies in an area occupied by industrial

facilities, agricultural lands, some light commercial and sparse residential uses, and recreational beaches and tidal wetlands (Duke Energy 1999a). Sensitive noise receptors in the vicinity of the project are limited to scattered residences; no hospitals, libraries, schools or churches lie near enough to the site to be affected by noise from the project. The nearest residences are a single home 1,500 feet north of the facility; a single home at Highway 1 and Moss Landing Road south of the facility; a residential neighborhood adjacent to Allen Street, further to the south; boats moored in the harbor immediately west of the Moss Landing facility; and several residences at the Calcagno Dairy Farm, east of the facility.

Monterey County Ordinance (MCC 10.60.030):

No person shall, within the unincorporated limits of the County of Monterey, operate any machine, mechanism, device, or contrivance which produces a noise level exceeding eighty-five (85) dBA measured fifty (50) feet there from. The prohibition in this Section shall not apply to aircraft nor to any such machine, mechanism, device or contrivance which is operated in excess of two thousand five hundred (2,500) feet from any occupied dwelling unit. (Ord. 2450 § 3, 1978)

Analysis as to whether or not project activities would:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact Analysis:

The proposed project involves excavation of impacted soils and removal of concrete pads and other debris using equipment such as an excavator to remove and stockpile the impacted soils, a loader to place soils into the end dump trucks for transport to the landfill, and a large sheep's foot roller will be used for compaction of the backfill material. In addition, a water truck or towable spray tank (water buffalo) will be dedicated to the project for dust suppression/minimization and waste hauling vehicles (i.e., end dump trucks) will be required for the safe and efficient completion of the project.

Noise emission levels for construction equipment (including excavator, backhoe, grader, loader, roller, truck, and jackhammer) range from 74 to 89 dBA (decibels on A scale) 50 feet from source. The nearest residence is located approximately 1,500 feet northeast of the project area (Caltrans 2006). Although noise from onsite proposed project activities would periodically increase, this construction noise will be temporary. Also, construction noise during certain hours is commonly exempted from enforcement by local ordinances; noise levels must be lower at night (period from 10 p.m. to 7 a.m.) than during the daytime. The proposed project activities will be conducted during the daytime with no activities during the night. Existing noise levels at MLPP are within standards established for an industrial setting, and the proposed project would remain within those standards. Thus the impact from project activities would be less than significant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

Impact Analysis: (Next Page)

Vibration levels from construction equipment range from approximately 0.003 to 0.210 peak particle velocity (PPV) at 25 feet (inches/second). Based on the surrounding industrial land uses, any periodic occurrence of ground borne noise or vibration would be less than significant to the surrounding power plant and unnoticeable offsite.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

Impact Analysis:

The increased amount of truck vehicle traffic to the project site may result in a small increase in the ambient noise level. However, this increase will probably not be discernable to the average person and will therefore have a less than significant impact on the ambient noise level.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Impact Analysis:

Proposed project activities will result in periodic noise from excavation and transportation of impacted soils. However, this noise should occur only on weekdays, between 7:00 a.m. and 6:00 p.m.; and would be reduced substantially by the time it reaches off-site receptors. Therefore the temporary and periodic increase in noise level from the project will have a less than significant impact on ambient noise levels.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

12. Population and Housing

Project Activities Likely to Create an Impact:

Implementation of the Interim Measures Work Plan will not entail construction of new housing or demolition of existing housing.

Description of Baseline Environmental Conditions: (Next Page)

All workers are expected to be drawn from the area surrounding the project site or commute to the site from outside the area. As a result, no additional demand will be placed on housing, schools or other community resources associated with population growth.

Analysis as to whether or not project activities would: (Next Page)

- a. Induce substantial population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Impact Analysis:

Implementation of the Interim Measures is expected to be completed within 3 months, requiring some additional site workers. Site workers are not expected to relocate to the area due to this project. Any site workers from outside the area are likely to reside in motels or hotels in the vicinity during the course of the proposed project. In addition, the proposed project would neither construct nor demolish any housing or affect the housing needs in the local community.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

13. Public Services

Project Activities Likely to Create an Impact:

The proposed project is limited to excavation of impacted soils within the confines of the MLPP Facility. No public schools, parks, or governmental facilities are present within the affected project area, and no increase in public safety services would be required during, or as a result of, project implementation.

Description of Baseline Environmental Conditions:

Fire Protection

The North County Fire Protection District (NCFPD) provides fire protection to the community of Moss Landing and the project site. The NCFPD operates three fire stations and provides fire protection and emergency medical services to 164 square miles of predominately rural land with a population of approximately 45,000 in the District. Within the boundaries are the growing communities of: Castroville, Moss Landing, Oak Hills, Pajaro, Prunedale, Elkhorn, Las Lomas, and Royal Oaks, four major highway (101, 156, 183 & 1), one railway, two rivers (Salinas and Pajaro), 9 miles of beach/water front, and one private airfield. The District's three fire stations are strategically located and Station one in Castroville is closest to the project site.

Police Protection

MLPP has its own security services at the facility through its corporate security office and relies on local fire departments to respond to emergencies such as fires, hazardous materials incidents, and

medical emergencies. For incidents that cannot be handled by the onsite security, MLPP requests assistance from local law enforcement agencies. The Monterey County Sheriff provides police protection to the community of Moss Landing including the MLPP facility.

The site is surrounded by a chain-link fence and the access is controlled to prevent unauthorized personnel from entering the active portion of the facility.

Emergency Medical Response

Medical facilities are available at Watsonville Community Hospital within 15 minutes of the project site. Also Natividad Medical Center and Community Hospital of Monterrey are both within 30 minutes of the project site. Watsonville Community Hospital is located at 75 Neilson Street, Watsonville, approximately 9.5 miles from MLPP. Natividad Medical Center is located at 1441 Constitution Blvd # 400, in Salinas, approximately 18.3 miles from MLPP. Community Hospital of Monterrey is located at 576 Hartnell Street # 340, in Monterey and is approximately 18.4 miles from MLPP. There is a Doctor on Duty for urgent medical attention located at 1505 Main Street in Watsonville, and is approximately 8.9 miles from MLPP.

Schools, Parks, Other Public Facilities

Moss Landing State Beach and Salinas River State Beach are located north and south of MLPP, respectively. Elkhorn Slough Ecological Preserve is located north of MLPP. No other parks or open spaces are in the vicinity of MLPP and the community of Moss Landing.

MLPP is located in the North Monterey County Unified School District which operates four Elementary Schools Castroville Elementary, Echo Valley Elementary, Elkhorn Elementary and Prunedale Elementary. Also, there are two Middle Schools are Gambetta (Joseph) Middle School and Moss Landing Middle School; and two High Schools are El Camino High School and North M.C. High School in the North Monterey County Unified School District. No existing or projected capacity shortages have been reported for this school district.

Analysis as to whether or not project activities would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- Fire protection
- Police protection
- Schools
- Parks
- Other public facilities

Impact Analysis:

No increased demand for schools, parks, or additional governmental facilities would result from implementation of Interim Measures at MLPP. Should project activities result in an emergency, public services such as the fire department, emergency medical services, or local law enforcements may be dispatched to the Site. Also, inclusion of an emergency response plan in the site-specific Health and Safety Manual, the proposed project activities would have negligible or no effect on the public services and facilities serving Moss Landing.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

14. Recreation

Project Activities Likely to Create an Impact:

Implementation of Interim Measures would not increase the use of existing recreational facilities or create a need for additional recreational facilities for the community.

Description of Baseline Environmental Conditions:

In the community of Moss Landing, Moss Landing State Beach and Salinas River State Beach are located north and south of MLPP, respectively. Elkhorn Slough Ecological Preserve is located north of MLPP. Also, there are other local County Parks in the community of Moss Landing.

Analysis as to whether or not project activities would:

- a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact Analysis:

The project will not affect access to or use of existing regional parks and recreational facilities. The nearby recreational land uses will not be impaired by the proposed project activities.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Analysis:

The proposed project is limited to excavation of impacted soils within the confines of MLPP with no construction or expansion of public recreational facilities. No impact.

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

15. Transportation and Traffic

Project Activities Likely to Create an Impact:

- Additional Employee Traffic
- Offsite Transportation of contaminated soils

Description of Baseline Environmental Conditions:

The operating conditions of a roadway system are described using the term "level of service". Level of service (LOS) is a description of a driver's experience at an intersection or roadway based on the level of congestion (delay). However, it is not a measure of safety or accident potential. Intersection and roadway LOS can range from "A", representing free-flow conditions with little or no delay, to "F", representing saturated conditions with substantial delay. A LOS C threshold is the minimum standard accepted by Monterey County.

Existing Traffic

Performance levels of the principal roadways in the project area operating worse than the LOS C standard include Highway 1 (Highway 156 to Highway 183); Highway 1 (Highway 183 to Dolan Road); and Highway 1 (Dolan Road to Salinas Road). Dolan Road and Castroville Boulevard are operating at an acceptable LOS.

The performance levels of the principal intersections and unsignalized intersections in the project area such as Highway 1 and Salinas Road (a.m. and p.m. peak hours); Highway 1 and Dolan Road (p.m. peak hour); Prunedale Road North and Highway 156 (p.m. peak hour); and Highway 1 and Highway 183 (p.m. peak hour) are operating worse than the LOS C standard.

The unsignalized intersection of Highway 1 and Dolan Road provides a major access point to the MLPP site. While the overall morning peak hour operation is LOS A, on the westbound Dolan Road left-turn movement is operating at LOS F. During the afternoon peak hour, the overall operating condition is LOS F with the westbound (Dolan Road) left-turn movement operating at LOS F and the right-turn movement operating at LOS D.

Existing Parking Capacity

Existing, designated parking at MLPP Facility can accommodate approximately 1000 vehicles.

Analysis as to whether or not project activities would:

- a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

Impact Analysis:

Dolan Road, located south of MLPP, carries approximately 3,300 vehicles per day. MLPP access points are primarily along Dolan Road. Highway 1 traverses along the coast, west of MLPP, and carries approximately 37,500 vehicles per day.

The proposed project is expected to add approximately 5 to 6 additional employee vehicles per day routinely during peak traffic hours for a short duration of 3 months during implementation of Interim Measures related-activities. The proposed project is also expected to generate a temporary truck traffic associated with transportation of construction equipment, excavated soil and waste generated by project activities. All trucks used in transport of the construction equipment, excavated soils and waste water will be scheduled to make deliveries and pick-ups from the project site between the hours of 8:00 AM to 11:00 AM. There will be no trucks deliveries and shipment scheduled for evening peak commute hours. The project is anticipated to last no more than 3 months and approximately 20 to 25 trucks are anticipated per day for a total of 20 working days during that time. Trucking company(s) will be informed of the requirements to make a right turn out of Dolan Road onto Highway 1 North. All trucks entering and leaving MLPP will

travel on Dolan Road, turn right on to Highway 1 North and exit on Highway 152/Watsonville to access Interstate 5.

The increase in passenger vehicle traffic during peak hours is not considered substantial in relation to the existing traffic load on Highway 1 and capacity of Dolan Road

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

Impact Analysis: (Next Page)

The temporary addition of additional vehicles and truck would not affect the existing Level of Service in the vicinity of MLPP.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis:

The proposed project is limited to excavation of impacted soils and transportation offsite; and has no elements that would affect the design of transportation routes or intersections. The transport trucks will continue to use designated truck routes and comply with U.S. Department of Transportation regulations. MLPP will assure that any trucks transporting waste from the facility will use hazardous waste manifests, U.S. Department of Transportation regulation placards and that drivers are properly trained in the transportation of hazardous waste.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Result in inadequate emergency access.

Impact Analysis:

Offsite responders would access the site through two gates on Dolan road via Highway 1. The proposed project activities will not affect these existing access routes for offsite entities responding to an onsite emergency.

Conclusion:

- Potentially Significant Impact

- Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

e. Result in inadequate parking capacity.

Impact Analysis:

Existing, designated parking at the facility can accommodate approximately 1000 vehicles. The onsite parking capacity will be able to accommodate any project-related parking requirement without modification and will not result in inadequate parking capacity inside or outside the facility.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Impact Analysis:

Project-related traffic would be almost exclusively limited to trucks, mobile equipment, and personal vehicles. Therefore, proposed project activities will not impact any other forms of transportation (rail or air traffic) and public transit facilities such as bus turnouts

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

16. Utilities and Service Systems

Project Activities Likely to Create an Impact:

- Facility water used for Dust Suppression
- Disposal of impacted soil and PPE, construction debris, and waste water at an approved landfill.

Description of Baseline Environmental Conditions:

Water Supply: Potable water is supplied by the Moss Landing Mutual Water Company from wells located to the west of the plant. This water is chlorinated before distribution. Groundwater demand during the proposed project activities will be small compared to historical use of 54,200 gallons per day of well water by MLPP facility (Duke Energy 1999a).

Analysis as to whether or not project activities would:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Impact Analysis:

All of the wastewater generated during remediation, including but not limited to, groundwater pumped out of excavations and decontamination liquids, will be temporarily placed inside 55-gallon DOT-approved drums or an onsite aboveground storage tank (i.e. Baker Tank). All wastewater generated in the course of the work will be characterized and managed in accordance with applicable State and Federal regulations. Therefore, the proposed project will not exceed the wastewater standards and treatment requirements of the Regional Water Quality Board

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:

Wastewater generated by the proposed project activities would be approximately 1000 gallons or less. All wastewater will be collected and characterized prior to any off-site disposal. There would be no significant increase in the quantity of domestic or industrial wastewater discharged from the facility as a result of the proposed project.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:

Any storm water at the proposed project site will be collected and analyzed before it is transported offsite for disposal. Therefore, there will be no significant impact on existing local or regional storm water drainage systems from implementation of the proposed project.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Impact Analysis:

The proposed project activities will use water for dust suppression, which will be brought in from offsite using a water buffalo. Therefore, no significant impact on existing water use is anticipated and no new or expanded entitlements will be required.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

See response in subsection 16(b), above. No impact.

- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

Impact Analysis: (Next Page)

Recyclable construction material, which is not contaminated, will be transported to a local recycling facility or a landfill which handles inert material. Waste generated by the proposed project activities would have a less than significant impact on the landfill's capability to receive waste.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- g. Comply with federal, state, and local statutes and regulations related to solid waste.

Impact Analysis:

All waste generated by the proposed activities will be characterized and transported offsite for appropriate disposal to a properly designated facilities and/or landfills. The proposed project will be conducted in compliance with all federal, state, and local statutes and regulations related to solid waste.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

Mandatory Findings of Significance

Based on evidence provided in this Initial Study, DTSC makes the following findings:

- a. The project has does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.
- b. The project has does not have impacts that are individually limited but cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.
- c. The project has does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.



Determination of Appropriate Environmental Document:

Based on evidence provided in this Initial Study, DTSC makes the following determination:

- The proposed project **COULD NOT HAVE** a significant effect on the environment. A **Negative Declaration** will be prepared.
- The proposed project **COULD HAVE** a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.
- The proposed project **MAY HAVE** a significant effect on the environment. An **Environmental Impact Report** is required.
- The proposed project **MAY HAVE** a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.
- The proposed project **COULD HAVE** a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

Certification:

I hereby certify that the statements furnished above and in the attached exhibits, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

 Preparer's Signature	5-18-09 Date	
Suhasini Patel Preparer's Name	Hazardous Substances Scientist Preparer's Title	916.255.6428 Phone #
 Branch or Unit Chief Signature	5/18/09 Date	
Donn Diebert Branch or Unit Chief Name	Supervising Hazardous Substances Engineer, Brownfields and Environmental Restoration Program Branch or Unit Chief Title	916.255.3728 Phone #

ATTACHMENT A**REFERENCES****American Industrial Hygiene Association (AIHA)**

- 1975 AIHA, 1975, Industrial Noise Manual.
- 1999 AIHA, 1999 Emergency Response Planning Guidelines.

Air Resources Board (ARB)

- 2008 CEQA Air Quality Guidelines, February 2008.

California Department of Transportation (Caltrans)

- 2006 Caltrans: California Department of Transportation website:
http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf
- 2009 California Scenic Highway Mapping System (website accessed 4 Feb 2009)
http://www.dot.ca.gov/hq/LandArch/scenic_highways/

CALIFORNIA COASTAL COMMISSION (CCC)

- 1985 CCC: Designation of Coastal Zone Areas Where Construction of an Electric Power Plant Would Prevent Achievement of the Objectives of the California Coastal Act of 1976. September 1978. Revised 1984, Re-adopted December 1985.

California Department of Fish and Game (CDFG)

- 2000 Computerized database search of the California Natural Diversity Database (CNDDDB), Special-Status Animals (January 2000); Special-Status Plants List (January 2000).

California Energy Commission (CEC)

- 2000a CEC: *Preliminary Staff Assessment*, Application for Certification (99-AFC-4) Moss Landing, Monterey County February 2000
- 2000b Source: Final Staff Assessment, Part 1, MLPP Project, Application for Certification, Moss Landing – Monterey County (May 2000)
http://www.energy.ca.gov/sitingcases/mosslanding/documents/2000-05-16_MOSS_FSA_PART_01.PDF

Central Coast Region Water Quality Control Board (CRWQB)

- 1997 Central Coast Region Water Quality Control Basin Plan (1994), California Ocean Plan (1997) and the Thermal Plan (1975)

California Geological Survey (CGS)

- 1997 Fault-Rupture Hazard Zones in California; Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps: California Division of Mines and Geology (now the California Geological Survey) Special Publication 42, Hart, E.W. and Bryant, W.A. (1997)
Supplements added: <http://www.consrv.ca.gov/cgs/rghm/ap/indes.htm>.

California Natural Diversity Database (CNDDB)

- 2006 RareFind 3, Version 3.0 March 30, 2006, update). Records search of the Moss Landing 7.5 minute Quadrangle. Sacramento, CA: California Department of Fish and Game

California Native Plant Society (CNPS)

- 1994 California Native Plant Society, Inventory of Rare and Endangered Vascular Plants of California, Sacramento, February 1994

County of Monterey (Monterey County)

- 1982a Monterey County General Plan, Water Service Policy, 1982
- 1982b North County Land Use Plan, 1982 (amended May 19, 1987).
- 1995a Monterey County Coastal Implementation Plan Part 1, Title 20 Zoning Ordinance, August 1995
- 1995b Monterey County General Plan, Chapter 2: Environmental Constraints; Noise Hazards, Updated 1995.
- 2001 Monterey County General Plan, Monterey County Building and Planning Division, December 2001, Amended 1992
- 2007 Monterey County General Plan, November 2007 (website accessed 4 Feb 2009):
<http://www.co.monterey.ca.us/planning/gpu/draftNov2007>
- 2008 Monterey County General Plan Draft Environmental Impact Report, Volumes 1 and 2 (ICF Jones & Stokes, September 2008)
http://000sweb.co.monterey.ca.us/planning/gpu/2007_GPU_DEIR_Sept_2008/Text/Sec_04.5_Mineral_Resources.pdf

California Public Utilities Commission (CPUC)

- 1997 CPUC: "Mitigated Negative Declaration and Initial Study, Pacific Gas and Electric Company's Application No. 96-11-020 Proposal for Divestiture", Environmental Science Associates, August 1997.

California Department of Conservation (DOC)

- 2006 California Department of Conservation's Monterey County Important Farmland 2006 and Urbanization 1984-2004

Duke Energy (Duke)

- 1999a. Application for Certification, Moss Landing Power Plant Project (99-AFC-4) Submitted to the California Energy Commission, May 1999.
[<http://www.energy.ca.gov/sitingcases/mosslanding>]
- 1999b. Cultural Resources: various confidential filings; Submitted to the Energy Commission, May 7, 1999.

Earthquake Engineering Research Institute (EERI)

- 1990 EERI: Loma Prieta Earthquake Reconnaissance Report, in Earthquake Spectra, Supplement to Volume 6, Page 210, Benuska, L. (editor). May 1990

Flour Daniel GTI (FD-GTI)

- 1997a Phase II Environmental site Assessment – Pacific Gas and Electric Company, Moss Landing Power Plant, Moss Landing, California, July 1997
- 1997b Phase II Environmental site Assessment: Non Generation Property – Pacific Gas and Electric Company, Moss Landing Power Plant, Moss Landing, California, December 1997

ICF Jones & Stokes

- 2008 ICF Jones & Stokes, 2007 Monterey County General Plan Draft Environmental Impact Report, Volumes 1 and 2, September 2008.

Mittelhauser Corporation (Mittelhauser)

- 1994 Mittelhauser Corporation, *Bank 5 Soil Excavation Report, Moss Landing Power Plant, Moss Landing, California*. February 1994.

Levine-Fricke (LFR)

- 2005 LFR, (Levine-Fricke) *Technical Memorandum: Establishing Background Concentrations for Metals in Soil, using Statistical Methods, Moss Landing Power Plant, Moss Landing, California*.

MWH Americas (MWH)

- 2006 MWH: Human Health and Ecological Risk Assessment Work Plan for Moss Landing Power Plant, Moss Landing, California, May 2006
- 2008 MWH: Draft Ecological Risk Assessment Report, Moss Landing Power Plant, AOC –B Groundwater and AOC ETF-Soil, for Moss Landing Power Plant, Moss Landing, California, November 2008

Pacific Gas and Electric Company (PG&E)

- 1996 PG&E: "Proponent's Environmental Assessment Pacific Gas and Electric company's Proposed Sale of Four Generating Plants", Application of PG&E for Authorization to Sell

Certain Generating Plants and Related Assets Pursuant to Public Utilities Code Section 851,
November 15, 1996.

Parsons Engineering (Parsons)

- 2007 Parsons Engineering, *AOC Power Block 1-5 Rock Blotter Assessment Moss Landing Power Plant, Moss Landing, California, October 2007.*
- 2008 Parsons Engineering, Moss Landing Power Plant, Final Interim Measures Work Plan, AOC Power Block 1-5 Rock Blotter October 2008

State Water Resources Control Board (SWRCB)

- 1998 "Review of the California Thermal Plan (Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Waters and Enclosed Bays and Estuaries of California), Initial Staff Report, State Water Quality Control Board, July 1998.

ATTACHMENT B**ABBREVIATIONS AND ACRONYMS**

AOC	Area of Concern
ARB	Air Resources Board
AFC	Application for Certification
bgs	Below ground surface
Caltrans	California Department of Transportation
CAP	Coastal Agriculture Preserve
CBC	California Building Code
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHHSL	California Human Health Screening Level
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CPUC	California Public Utilities Commission
CY	Cubic Yards
CZ	Coastal Zone
dB	decibel (sound level measure)
dBA	A-weighted sound level
DOC	California Department of Conservation
DTSC	Department of Toxic Substances Control
DUKE	Duke Energy Moss Landing LLC
ESLs	Environmental Screening Levels
FCS	Federal Candidate Species
FESA	Federal Endangered Species Act
H&SC	California Health and Safety Code

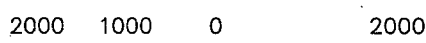
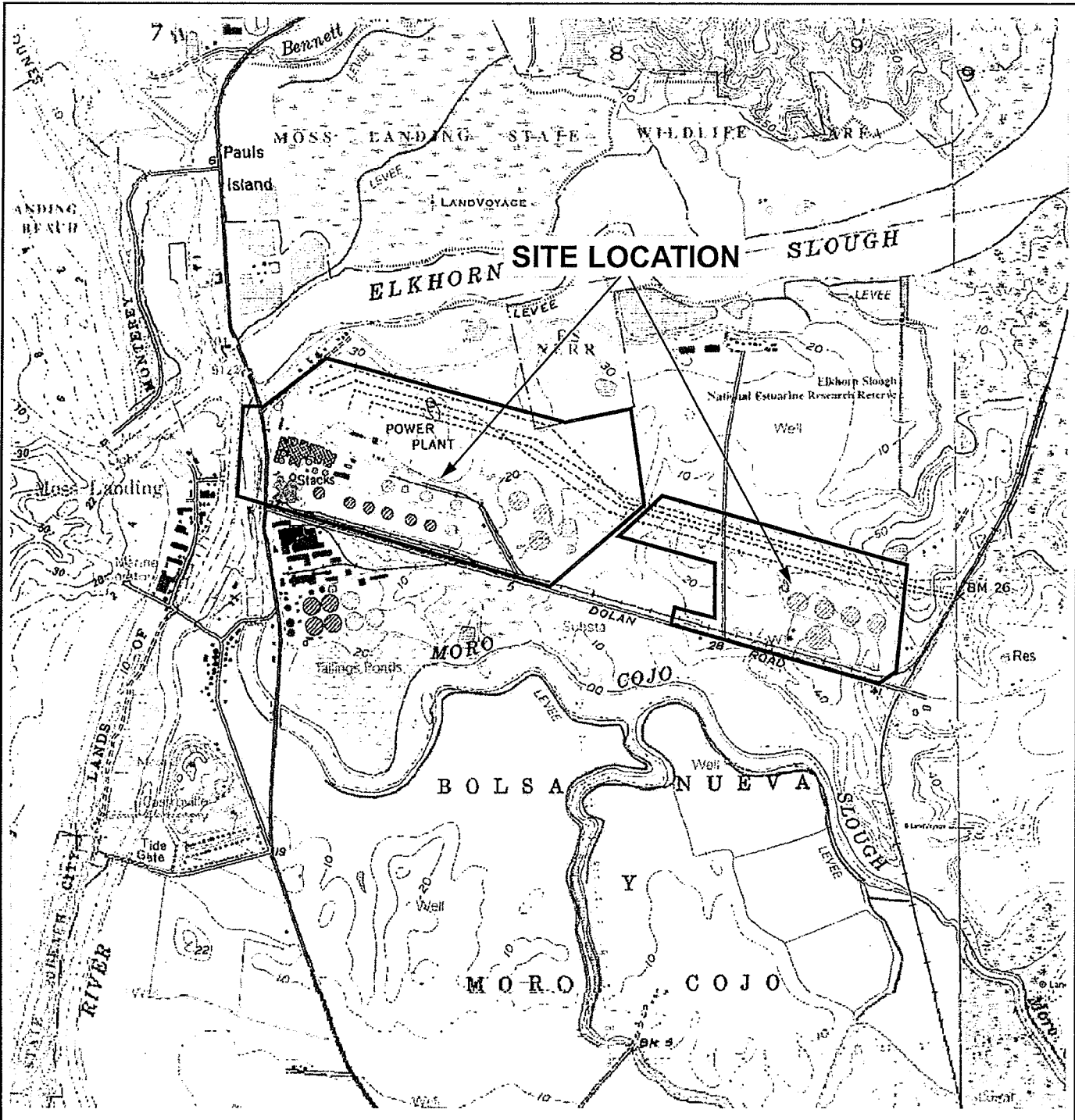
HAZWOPER Hazardous Waste Operations and Emergency Response

IM	Interim Measures
LOS	Level of Service
MBUAPCD	Monterey Bay Unified Air Pollution Control District
MLPP	Moss Landing Power Plant
MRZ	Mineral Resources Zone
MW	Megawatts
msl	mean sea level
NCCAB	North Central Coast Air Basin
NCFPD	North County Fire Protection District
NO _x	Nitrogen monoxide
NPDES	National Pollutant Discharge Elimination System
PB	Power Block
PCBs	Polychlorinated biphenyls
PG&E	Pacific Gas and Electric Company
PID	photo-ionization detector
PM ₁₀	Airborne Particulate Matter, 10 micrometers in size or smaller
PPE	Personal Protect Equipment
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
RWQCB	Regional Water Quality Control Board
SSC	Species of Special Concern
SSTL	Site Specific Target Levels
SWRCB	State Water Resources Control Board
TPH	Total Petroleum Hydrocarbons
TPH-md	Total Petroleum Hydrocarbons middle distillate
TPH-r	Total Petroleum Hydrocarbons residual range
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VOCs	Volatile Organic Compounds

ATTACHMENT C

FIGURES

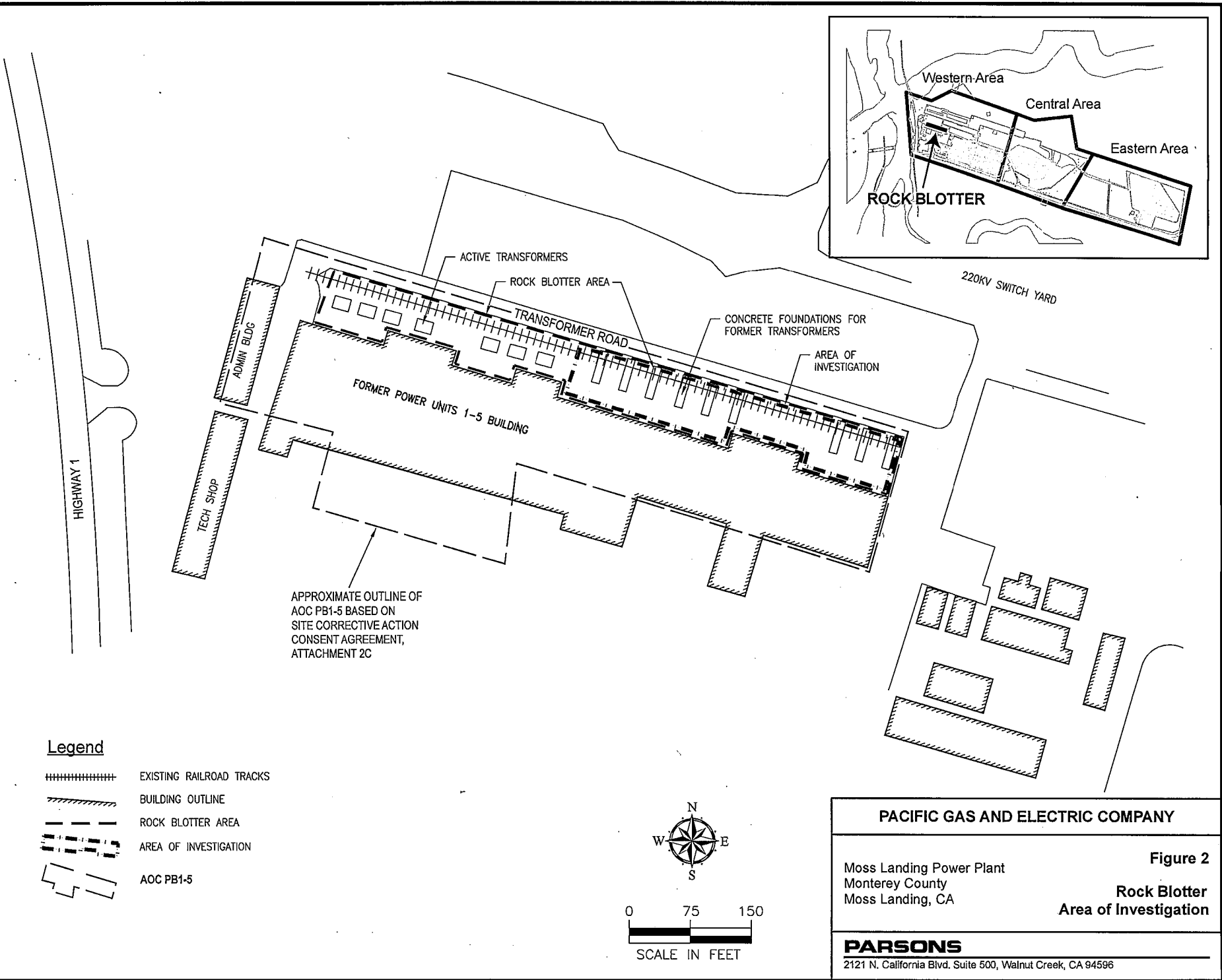
- 1 Site Location Map
- 2 Rock Blotter Area of Investigation
- 3 Rock Blotter Area Soil Analytical Results
- 4 Proposed Excavation Boundaries



SCALE IN FEET

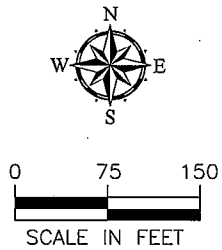
PACIFIC GAS AND ELECTRIC COMPANY	
Moss Landing Power Plant Monterey County Moss Landing, CA	Figure 1 Site Location Map
PARSONS 2121 N. California Blvd, Suite 500, Walnut Creek, CA 94596	

C:\Projects\gsm38397\MossLanding\CT\FCTF_BoringLocations\Figure_1_RockBlotter.pdf 05/30/2008

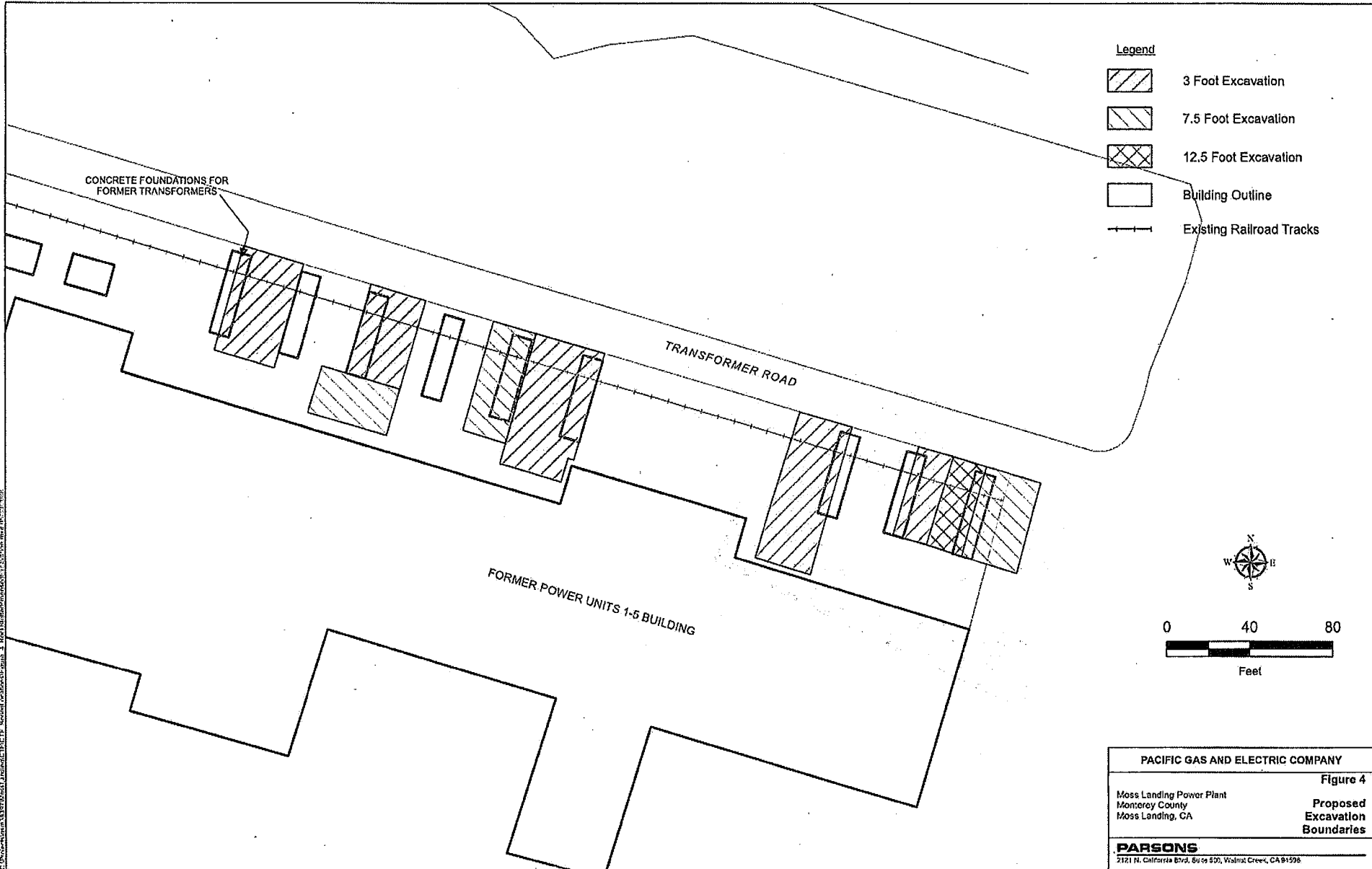


Legend

- ||||| EXISTING RAILROAD TRACKS
- ▨ BUILDING OUTLINE
- - - - - ROCK BLOTTER AREA
- - - - - AREA OF INVESTIGATION
- ⋯⋯⋯ AOC PB1-5



PACIFIC GAS AND ELECTRIC COMPANY	
Moss Landing Power Plant Monterey County Moss Landing, CA	Figure 2 Rock Blotter Area of Investigation
PARSONS 2121 N. California Blvd, Suite 500, Walnut Creek, CA 94596	



C:\pwork\user\3107\2\moss_landing\fig4.ctb 4 Monday, November 17, 2008 11:25:10 AM