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May 19, 2020

VIA E-MAIL ONLY

John M. Dugan
Chief of Planning
Resource Management Agency
Monterey County
1441 Schilling Place, South 2nd Floor
Salinas, California 93901
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Re: **Objection to the Cal Flats Solar Battery Energy Storage System Modification (PLN120294-AMD1)**

Dear Mr. Dugan:

We write on behalf of **California Unions for Reliable Energy (“CURE”)** in objection to the California Flats Solar Battery Energy Storage System Modification (PLN120294-AMD1). The proposed modification is an amendment to the approved and constructed California Flats Solar Project use permit to include the installation and operation of a Battery Energy Storage System and associated substation improvements.

The amendment is not minor in nature because the construction and operation of an energy storage system would increase the severity of valley fever impacts not identified in the prior EIR. There is new information of substantial importance requiring revisions to the previously certified environmental impact report (SCH#2013041031, certified by the Monterey County Board of Supervisors on February 10, 2015). For example, in 2018, the California Department of Public Health identified a substantial increase in the incidence of *Coccidioidomycosis* (also known as Valley Fever) outbreaks among workers constructing solar power plants in Monterey County.¹

¹ Rebecca Law, Ph.D., *Coccidioidomycosis Outbreak among Workers Constructing a Solar Farm – Monterey County, California, 2016-2017*, 67 Morbidity and Mortality Weekly Report 33 (Aug. 24, 2018), available at <https://www.cdc.gov/mmwr/volumes/67/wr/pdfs/mm6733a4-H.pdf>. 4834-001acp

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We object to the approval of the minor amendment based on the County's failure to conduct supplemental or subsequent environmental review pursuant to CEQA addressing the significant increase in Valley Fever identified since the publication of the prior EIR. A public hearing on the modification is warranted, and we request that this matter be referred to the Monterey County Board of Supervisors, the decision-making body of the original permit.

Thank you for your attention to this matter.

Sincerely,



Andrew J. Graf
Associate

AJG:acp

Enclosure