



The County of San Diego

Zoning Administrator Hearing Report

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| Date: | August 27, 2020 | Case/File No.: | Valley Center Energy Storage; PDS2020-STP-20-011, PDS2020-ER-20-08-005 |
| Place: | No in Person Attendance Allowed – Teleconference Only – County Conference Center 5520 Overland Avenue San Diego, CA 92123 | Project: | Consideration of the environmental findings to determine whether the proposed battery storage facility can be exempt from further environmental review pursuant to CEQA Guidelines § 15183 |
| Time: | 8:30 a.m. | Location: | 29523 Valley Center Road |
| Agenda Item: | #1 | General Plan: | Medium Impact Industrial |
| Appeal Status: | Appealable to the Planning Commission | Zoning: | General Impact Industrial (M54) |
| Applicant/Owner: | Valley Center ESS, LLC / James F. and Rita A. Donahue Trust | Community: | Valley Center Community Plan Area |
| Environmental: | CEQA § 15183 Exemption | APNs: | 189-013-20-00 |

A. OVERVIEW

The purpose of this staff report is to provide the Zoning Administrator with the information necessary to make a finding that the mitigation measures identified in the General Plan Update Environmental Impact Report (GPU EIR) will be adequate for a proposed Site Plan Permit (STP) pursuant to California Environmental Quality Act (CEQA) Guidelines §15183(e)(2).

CEQA Guidelines §15183 mandates a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan, or general plan policies for which an EIR was certified.

In accordance with CEQA Guidelines §15183, the Project was evaluated to examine whether additional environmental review might be necessary for the reasons stated in §15183. As discussed in the attached Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist (15183

Findings) dated August 27, 2020, the Project qualifies for an exemption from further environmental review.

The Applicant, Valley Center ESS, LLC, is requesting approval of a STP to construct a battery storage facility (Project) on an 8.93-acre site. The STP is required because the site has a "B" Special Area Designator.

As part of the discretionary permit processing, the County is required to evaluate the impacts a project would have on the environment. Projects that are consistent with the analysis performed for the GPU EIR and do not introduce significant effects that were not identified in the GPU EIR (i.e., peculiar), are subject to a streamlined environmental review process pursuant to CEQA Guidelines §15183. The purpose of today's hearing is not to approve or deny the Project, but to evaluate whether the Project can be streamlined pursuant to CEQA Guidelines §15183.

The approval, approval with modifications, or denial of the proposed STP will be a subsequent and separate decision made by the Director of Planning & Development Services (PDS).

B. PROJECT LOCATION

The Project is located on an 8.93-acre parcel at 25923 Valley Center Road in the Valley Center Community Planning area within unincorporated San Diego County (Figure 1). Access will be provided via a 60-foot wide private road and utility easement located off Valley Center Road.

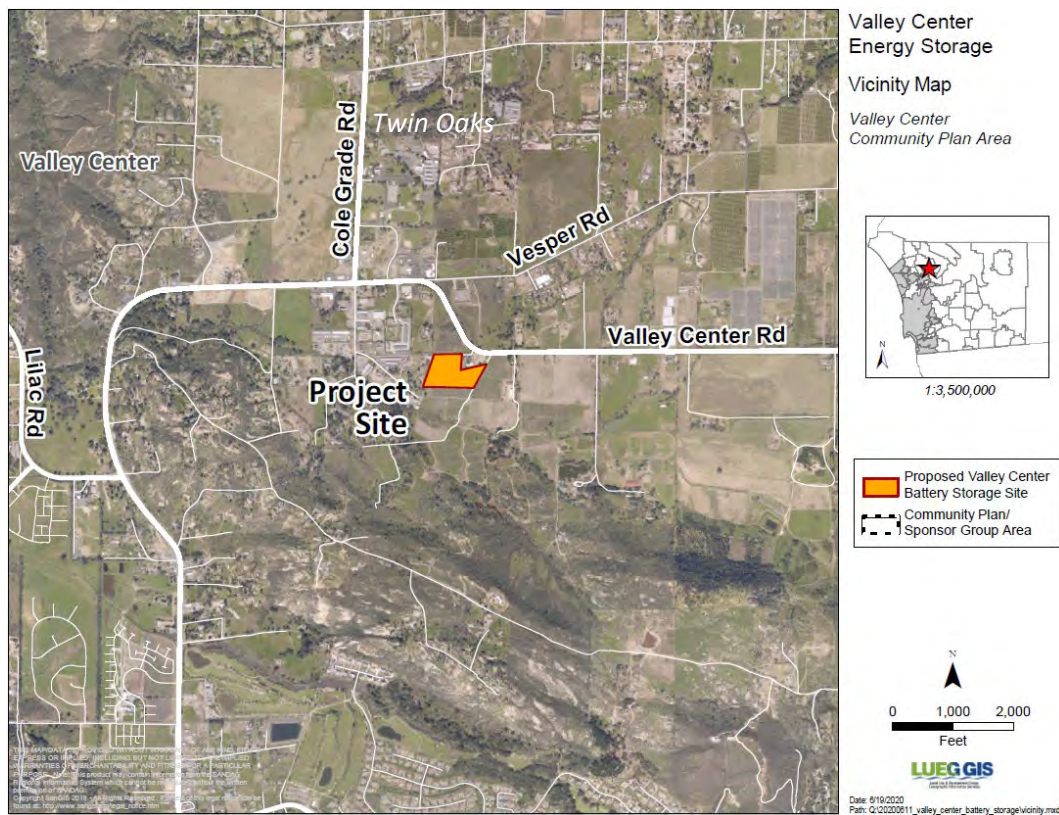


Figure 1: Vicinity Map

C. DEVELOPMENT PROPOSAL

1. Project Description

The Applicant proposes to construct, own, and operate a lithium-ion battery energy storage facility capable of delivering up to 140 megawatts (MW) for approximately four hours. The Project will interconnect to the existing, San Diego Gas & Electric (SDG&E) 69 kilovolt (kV) Valley Center Substation on the north side of Valley Center Road via an approximately 0.3-mile underground generation tie line (gen-tie line). The Project will be comprised of up to 58 sets of four battery enclosures (each enclosure approximately 31.6 feet long by 5.7 feet wide by 8.6 feet high) that will house the integrated Battery Energy Storage System (BESS) including battery cells, modules, racks, fully integrated fire and safety systems, HVAC systems, and other electrical systems. From the BESS containers, low voltage cables will connect to low profile, pad inverter/ transformers located adjacent to the BESS units, and to a control center enclosure called a Power Distribution Center (PDC). The batteries will be charged from the CAISO (California Independent System Operator) grid via the Project's interconnection to the existing SDG&E Valley Center Substation. Energy stored in the Project will then be discharged back into the grid when the energy is needed (e.g., nighttime), providing essential electricity reliability services to the local area.

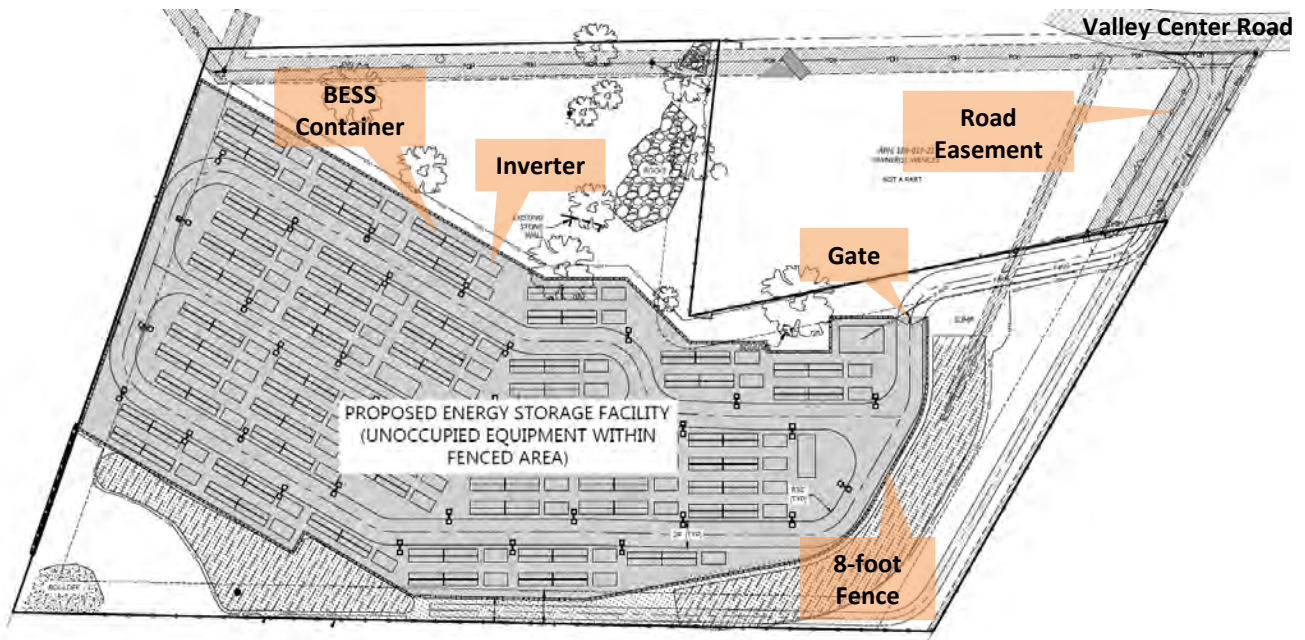


Figure 2: Plot Plan



Figure 3: Rendering of the site looking southeast

Access to the Project site is provided from Valley Center Road via a permanent Project-controlled easement that is gated. The site access road will comply with County regulations and be stabilized using gravel in order to provide access to operational, fire department, and emergency vehicle access to the facility. Project site equipment and facilities will be surrounded by a solid, 8-foot tall vinyl fence. The fence will be built flush with the ground and have the appearance of a paneled wood fence. Existing fences surrounding the property boundary will remain. Lighting at the Project site will be installed per County requirements.

The Project will be un-maned during operations, with no buildings or parking areas. The Project would not require restroom facilities. Any operational water that may be required for routine maintenance would be trucked in from offsite or sourced by a new Valley Center Municipal Water District (VCMWD) service. No groundwater would be used for any purposes during construction or operational phases of the Project.

The Project will interconnect to the existing, adjacent SDG&E 69kV Valley Center Substation via a Project constructed underground gen-tie line that, upon leaving the Project site will cross Valley Center Road heading north onto SDG&E property for approximately 0.3 miles. Four alignment options are being considered and have been evaluated for the gen-tie line (Figure 4). All four options leave the Project site access easement, cross under Valley Center Road and then:

- Option A: enters SDG&E's property and heads north, adjacent to existing SDG&E underground circuits within SDG&E's property and enters the substation at the point of interconnect.
- Option B: enters SDG&E's property following Option A, but travels across the property in a northwesterly direction until reaching the substation.
- Option C: follows the southern and western property boundaries within SDG&E's property until turning easterly to access the substation from the west.

- Option D: follows the west-bound Valley Center Road right-of-way before entering SDG&E's property, following Option C in the easterly direction to access the substation.

All four options are approximately the same length. The Project will be operated, monitored and dispatched remotely on a day-to-day basis. Crews of two to four person's will periodically visit the site (approximately twice per month) for routine inspection and maintenance of the facilities and site. The Applicant will own and maintain the gen-tie line up to the point where the gen-tie line enters SDG&E property, where ownership and maintenance responsibilities will be transferred to SDG&E.

The facility is anticipated to have a Project life of approximately 30 years. At the end of the Project life, the Project's enclosures, batteries, and electrical equipment (breakers, transformers, inverters) will be removed and recycled. Equipment foundations and pads will be demolished and removed.

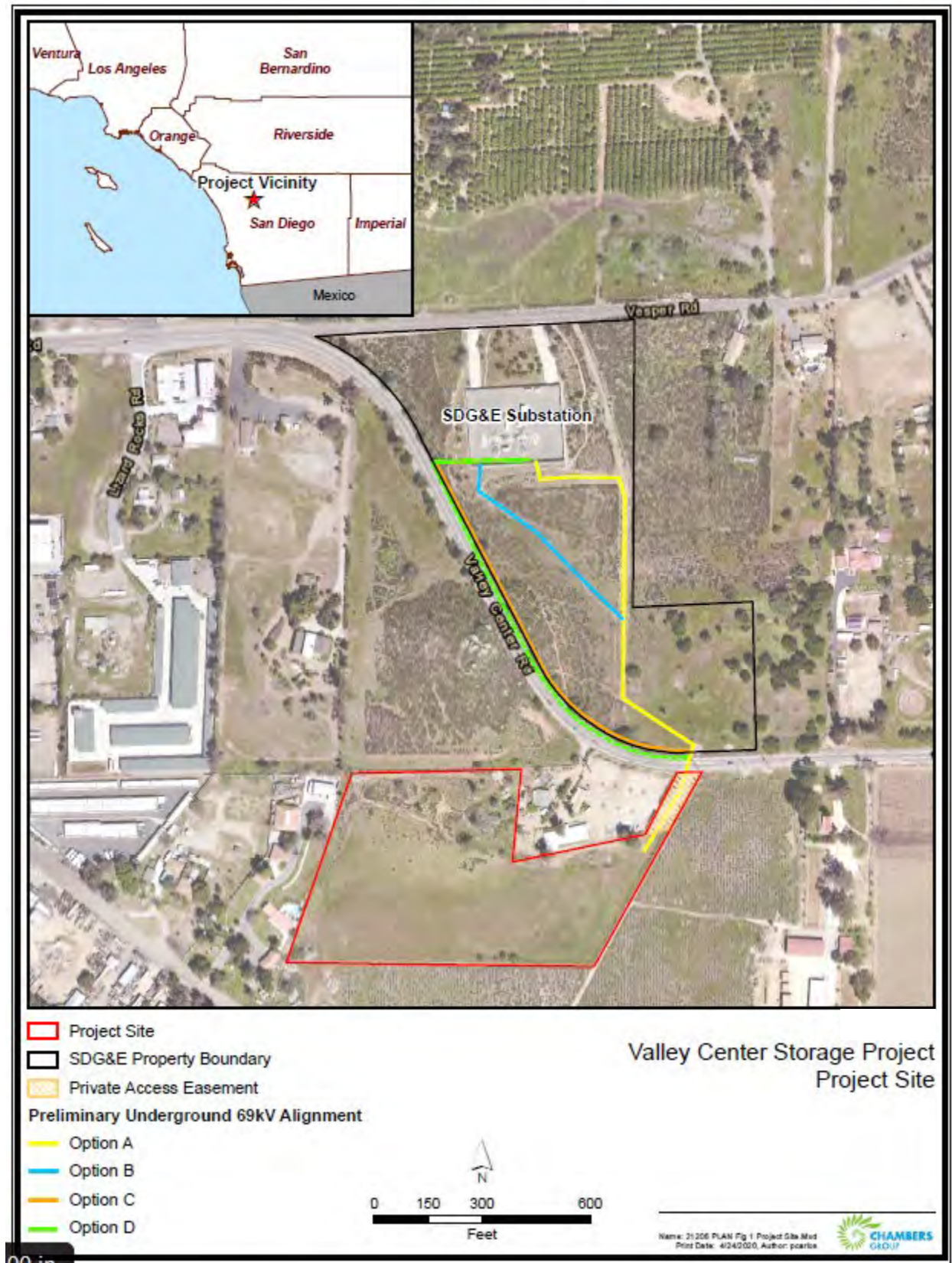


Figure 4: Alignment Options

D. ANALYSIS AND DISCUSSION

The Project has been reviewed for compliance with CEQA, and a 15183 Checklist was prepared. A discussion of the Project's consistency with CEQA Guidelines §15183 is described on the following pages. Concerns raised by the public are discussed below.

1. Key Requirements for Requested Actions

The Zoning Administrator shall determine whether the following findings can be made.

- a. The project is consistent with the development density established by existing zoning, community plan, or general plan policies for which the GPU EIR was certified.
- b. There are no project specific effects which are peculiar to the project or its site.
- c. There are no project specific impacts which the GPU EIR failed to analyze as significant effects.
- d. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.
- e. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

2. Project Analysis

a. Aesthetics

The public raised concerns that the Project will have negative visual impacts to surrounding properties.

The Project site is located south of Valley Center Road, which is designated within the County General Plan as a County Scenic Highway. As shown in the visual simulations included in Attachment C, prepared by POWER Engineers, Inc. in April 2020, views of the Project site from Valley Center Road would be minimal, with the commercial use to the north, vegetative screening, and topography obstructing the majority of views to the Project. Some of the businesses surrounding the Project site include storage companies, farm supply stores, propane companies, an auto-repair shop, a U-HAUL dealer, and a paving company. The Project design is consistent with the surrounding industrial and commercial land uses. Additionally, the Project is in compliance with General Impact Industrial (M54) zoning regulations and the Valley Center's Design Review Guidelines.

As discussed above, the Project will not result in any significant impacts to aesthetics; therefore, the Project will not result in an impact which was not adequately evaluated by the GPU EIR.

b. Biological Resources

Biological resources on the Project site were evaluated in a Biological Resources Letter Report prepared by Chambers Group Inc (June 2020). As detailed in the Biological Resources Letter Report, four vegetation communities were documented within the Project site, offsite component (SDG&E substation gen-tie line), and surrounding parcels. These vegetation communities

include disturbed habitat, non-native grassland, Diegan coastal sage scrub (CSS) and extensive agriculture (row crops). While the Project site primarily consists of disturbed land due to previous agricultural use, a small area (0.62 acre) of low-quality CSS is present onsite.

In order to determine if California gnatcatcher (CAGN) was present onsite or within the vicinity, field surveys were conducted in November 2019, March 2020 and June 2020. A solitary CAGN was detected within scrub habitat during the reconnaissance-level survey performed for the Project in November 2019, approximately 100 feet west of the Option B alignment of the gen-tie line and outside of any anticipated disturbance area. The solitary CAGN was heard calling and was likely foraging within the California buckwheat west of the Project area. After five minutes, the CAGN was not heard again and was not detected again for the remainder of the survey. No additional observations of CAGN occurred during the other mentioned surveys.

The Project will permanently impact 0.62 acre of low-quality CSS. A Habitat Loss Permit (HLP) will be required for the Project or a de minimus finding must be made prior to the issuance of a grading permit. In order to issue an HLP, the County must have a Planning Agreement executed with United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW). If the County is unable to issue an HLP, the Project will be required to obtain written concurrence from USFWS and CDFW that take of CAGN is not reasonably certain to occur.

The Project will mitigate for impacts to the 0.62-acre of onsite CSS either in the form of mitigation credits from an approved mitigation bank or through onsite revegetation, enhancement and placement within a biological open space easement. If the Applicant elects to satisfy the mitigation requirements through the revegetation and enhancement of habitat located on the Project site, a Final Revegetation Plan would be required as a condition of approval. In addition, temporary impacts due to construction of the gen-tie line will be restored to pre-Project conditions. If the grading, clearing, and/or construction activities occur during the breeding seasons for migratory birds or raptors (February 1 – August 31), surveys will be conducted prior to construction activities to reduce impacts. The GPU EIR identified these mitigation measures as Bio-1.5 and Bio-1.6.

As discussed above, the Project will have a less than significant impact with mitigation by incorporating the GPU EIR mitigation measures Bio-1.5 and Bio-1.6. Therefore, the Project is consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

c. Fire

The public raised concerns over fire safety during the public disclosure period regarding the location of the Project within a high fire hazard area. In addition, questions were raised if the Valley Center Fire Protection District (VCPFD) reviewed the Project.

A Wildland Fire Protection Plan (FPP) dated April 2020 was prepared for the Project by Santa Margarita Consulting, Inc. The Project is located within a high fire hazard severity zone in the California Department of Forestry and Fire Protection (CALFIRE)'s designated Local

Responsibility Area (CALFIRE 2020). The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Consolidated Fire Code. The Project site will be serviced by the Valley Center Fire Protection District (VCFPD). The closest fire station is located 0.7-miles from the Project site at 28234 Lilac Road. According to the FPP, the emergency travel response time would be less than two minutes, which would meet the required five-minute travel time in the County General Plan's Safety Element. In addition, Project access has been designed in coordination with the VCFPD and in conformance with State law and local regulations. The VCFPD has reviewed and accepted the FPP prepared for the Project. The FPP describes how the Project complies with emergency access requirements, per the County Consolidated Fire Code, including turning radius and maneuverability of large emergency vehicles such as fire trucks and ambulances. All Project equipment will be setback at least 30 feet from property boundaries, fire access roads will be a minimum of 24 feet in width with appropriate turn-around capabilities, among other fire and safety systems and practices outlined in the FPP.

As discussed above, the Project will not result in any significant impacts to wildfire; therefore, the Project will not result in an impact which was not adequately evaluated by the GPU EIR.

d. Hazards and Hazardous Materials

Public concerns were raised for hazards during the public disclosure period regarding the safety of local residents if an explosion were to occur by the Project's battery storage. Further concerns were raised on the ability to safely put out a fire caused by a thermal runaway event and hazards to firefighters and first responders.

The Project will be required to comply with the Department of Environmental Health (DEH) requirements for transport and storage of hazardous chemicals and would be conditioned to prepare a Hazard Materials Business Plan (HMBP). The HMBP contains detailed information on the storage of hazardous materials at regulated facilities.

As the Certified Unified Program Agency (CUPA) for the County of San Diego, the Hazardous Materials Division (HMD) conducts routine inspections at facilities that are subject to the HMBP requirements. The purpose of these inspections is to ensure compliance with existing laws and regulations concerning HMBP requirements, to identify existing safety hazards that could cause or contribute to an accidental spill or release, and to suggest preventative measures designed to minimize the risk of a spill or releases of hazardous materials.

Under normal operations, Battery Energy Storage System (BESS) facilities do not store or generate hazardous materials in quantities that would represent a risk to offsite receptors. In addition, the Project's preventative measures and state-of-the-art fire and safety systems, as described further below, make an accident condition very rare. Nevertheless, because lithium-ion BESS facilities do store energy, a battery thermal runaway can occur if a cell, or area within a cell, achieves elevated temperatures due to thermal failure, mechanical failure, internal/external short circuiting, and electrochemical abuse.

The Project is also subject to the requirements of Chapter 12 of the 2019 California Fire Code which requires that all BESS use an Energy Management System for monitoring and balancing cell voltages, currents and temperatures. The system must transmit an alarm signal if potentially hazardous temperatures or other conditions such as short circuits, over voltage or under voltage, are detected. The fire code also requires the use of appropriate fire-extinguishing and smoke detection systems, which will be incorporated into each of the Project's BESS enclosures.

As previously stated, under normal operations, BESS do not store or generate hazardous materials in quantities that would represent a risk to offsite receptors. However, further analysis was conducted to determine potential impacts resulting from a release of toxics from an unlikely but credible fire or thermal event at the Project site. The EPA's "Risk Management Program Guidance for Offsite Consequence Analysis" and the California Accidental Release Prevention (CalARP) recommend conducting an offsite consequence analysis to represent release scenarios that are possible to occur (although unlikely) under a variety of weather and wind conditions to determine the distance certain projects should be sited relative to sensitive uses. Modeling assumptions and meteorological conditions that are used for conduction of an off-site consequence analysis are specified in the California Code of Regulations (CCR), Title 19, Chapter 4.5, Article 2735.1 et seq.

While the design failure event for this Project is a thermal runaway/fire event involving a single battery module, the HCA modeled a highly conservative case involving 1.5 battery racks. Because final manufacturer design and vendor selection has not been completed, a conservative estimate of 30 battery modules per rack was assumed. Using nighttime meteorological conditions, which represents the worst-case conditions, modeling results indicate that the event would generate a maximum toxic endpoint extending 17 yards (approximately 51 feet). Using daytime meteorological conditions, modeling results indicate that the maximum toxic endpoint would not exceed 10.9 yards (approximately 33 feet). All Project equipment would be set back at least 30 feet from property boundaries, resulting in a maximum toxic endpoint extending 21 feet from the Project boundary in nighttime conditions and three feet during daytime conditions. No schools, daycares, or residential structures are located within either of the ranges of the maximum toxic endpoint.

As previously stated, the HMBP would be required to also include an emergency response plan which is designed to minimize hazards to humans and the environment from a sudden release of hazardous waste, fires, or explosions. This includes required emergency response training for the VCFPD and staff. The emergency response plan requires immediate action take place if an event were to occur including notifying surrounding property owners and emergency responders. Operations staff at a remote facility would receive an alarm signal from the Energy Management System and immediately contact the VCFPD. As the VCFPD would have undergone training prior to Project operations, immediate action would be followed in accordance with the emergency response plan. The VCFPD would also evacuate any potential receptors to a safe distance from the event in order to ensure public safety.

While the highly conservative toxic release model is reflective of an unlikely, but credible fire event, no schools, daycares, or residential structures would be impacted by the Project. In the unlikely event of thermal runaway, the Project's preventative measures and fire and safety

systems are designed to limit the event to a single battery module as well as reduce the duration and intensity of an event, if it occurs.

The Project would have a less than significant impact as it relates to hazards and hazardous materials for the reasons detailed above, and the Project will be consistent with the analysis provided within the GPU EIR because it will not increase impacts identified within the GPU EIR.

e. Hydrology/Water Quality

The public raised concerns that the Project site is located within a floodplain and that the proper analysis was not completed.

A Floodplain Analysis dated April 2020 was prepared by Kimley-Horn and Associates, Inc for the Project. The Floodplain Analysis evaluated the potential for floodplain impacts associated with construction of the Project by completing a corrected duplicative floodplain analysis to accurately model baseline flood conditions within the vicinity of the Project site. The Project site is gently sloped to the south with all water flowing into the adjacent Keys Canyon Creek. Floodplain delineation and mapping for Keys Canyon Creek were completed by the Federal Emergency Management Agency (FEMA) and the County of San Diego Flood Control. A mapped FEMA and County floodplain currently exists in the eastern portion of the site. However, the Project site is subject to concentrated flows that originate along Valley Center Road which discharge through an existing culvert along the westbound lane of Valley Center Road to the north of the Project site.

According to the corrected duplicative analysis performed for the Floodplain Analysis, the floodplain associated with the Keys Canyon Creek flows through the site, but in an isolated channel versus the previously predicted swath. Due to the above information, the Project will be required to obtain a Conditional Letter of Map Revision (CLOMR) and a Letter of Map Revision (LOMR) as a Project condition of approval pursuant to FEMA to ensure no impacts would occur.

Additionally, a Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) dated June 2019 was prepared by Westwood Professional Services for the Project. The PDP SWQMP demonstrates that the Project will comply with all requirements of the Watershed Protection Ordinance (WPO) and regional Municipal Separate Storm Sewer System (MS4) Permit requirements for storm water management. A Drainage Study dated June 2020 was prepared by Westwood Professional Services for the Project. The Drainage Study determined that the Project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. The Drainage Study performed existing and proposed condition analyses which illustrated that there is an increase in the amount of runoff generated from the proposed condition. To ensure the additional runoff generated would not alter the rates downstream, a bioretention basin is proposed to capture the peak runoff rates from the Project site. The basin would be adequately sized to attenuate Project peak flow rates in the event of a 100-year storm event at a rate less than existing conditions.

The Project will have a less than significant impact for the reasons detailed above, and the Project will be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

f. Noise

Public concerns were raised related to potential noise impacts the Project would have on surrounding properties.

A Noise Impact Analysis dated May 2020 was prepared by Vista Environmental for the Project. The surrounding properties to the Project site are zoned Limited Impact Industrial (M52), Rural Residential (RR), Limited Agricultural (A70), and General Impact Industrial (M54). Each property has different required one-hour average sound limits depending on the zone. The A70 and RR zoned properties have a required one-hour average sound limit of 50 decibels (dBA) daytime and 45 dBA nighttime. The M52 and M54 zoned properties have a required one-hour average sound limit of 70 dBA for both the daytime and nighttime. Section 36.404(e) of the County Noise Ordinance states if a Project site is located on the boundary of two zones, the noise standard required is the average of the two zones. To be conservative, the nighttime one-hour average sound limit (45 dBA) was utilized for the calculation which resulted in a one-hour average sound limit between the different zones of 57.5 dBA. Pursuant to the modeling and calculations within the Noise Impact Analysis, the Project would meet the 57.5 dBA and 70 dBA one-hour average sound limit required by the County Noise Ordinance with the incorporation of a 8-foot tall vinyl fence.

The Project will comply with the Sections 36.408 through 36.410 of the County Noise Ordinance for construction noise. The Project construction equipment anticipated for use include the following: excavator, backhoe, dozer, roller/compactor, dump truck, concrete mixer, flatbed-mounted utility crane, portable generator and welding equipment, forklift, pickup trucks, and utility line trucks. The Project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the Project will operate construction equipment in excess of an average sound level of 75 dBA between the hours of 7 AM and 7 PM, Monday through Saturday. According to the Noise Impact Analysis, the maximum noise level limit of the Project during grading and construction would be 73 dBA.

Therefore, through adherence of Sections 36.408 and 36.409 of the County Noise Ordinance, the Project would not expose surrounding use types to excessive noise and the Project would be in conformance with County requirements. Therefore, the Project would not exceed applicable noise levels at the adjoining property lines.

E. PUBLIC INPUT

During the 45-day public disclosure period, from June 25, 2020 to August 10, 2020, staff received 13 public comment letters. Two of the letters received were from the Rincon Band of Luiseño Indians and San Diego County Archaeological Society, Inc. The Rincon Band of Luiseño requested to further discuss the Project. The San Diego County Archaeological Society stated they agree with the 15183 Checklist

that was prepared for the Project. One letter was in support of the Project. An additional letter of support from the International Brotherhood of Electrical Workers was received on August 12, 2020 after the public disclosure period closed. The remaining 10 letters received during the public disclosure period were in opposition to the Project with specific concerns related to aesthetics, fire, hazards, flood, and noise. As described in the Project analysis section above, the Project was reviewed for impacts to aesthetics, fire, hazards, flood, and noise. It was determined the Project will have less than significant impacts and that the Project will be consistent with the analysis provided within the GPU EIR. Please see Attachment D for the comment letters and responses.

F. COMMUNITY PLANNING OR SPONSOR GROUP

The Project is located within the Valley Center Community Planning Group (CPG) and Valley Center Design Review Board (DRB) area. The Project was heard at the June 8, 2020 and July 13, 2020 Valley Center CPG meetings. At the July 13, 2020 meeting, a motion was made to approve the Project; however, that motion failed by a vote of 3-11-1-0 (3-Yes, 11-No, 1-Abstain, 0-Absent). A subsequent motion was not made and there was no further discussion to hear the item at a subsequent meeting. Following the meeting, the Valley Center CPG sent a letter of opposition stating their concerns related to thermal runaway, release of toxic fumes that could result in harm to humans and groundwater, and concern the Valley Center Fire Protection District had not thoroughly reviewed the project.

The Valley Center DRB heard the Project at the June 9, 2020 meeting, and recommended approval of the Project by a vote of 4-0-0-1 (4-Yes, 0-No, 0-Abstain, 1-Vacant/Absent).

The Valley Center CPG and Valley Center DRB meeting minutes are included in Attachment D, Public Documentation.

G. STAFF RECOMMENDATIONS

Staff recommends that the Zoning Administrator adopt the Environmental Findings included in Attachment B, which includes a finding that the Project is exempt from further environmental review pursuant to §15183 of CEQA.

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Report Approved By:

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AUTHORIZED REPRESENTATIVE: _____



DARIN NEUFELD, CHIEF

ATTACHMENTS:

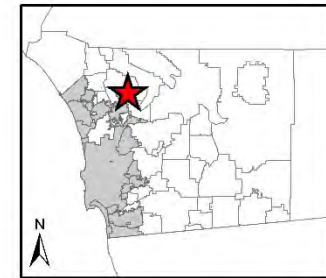
Attachment A – Planning Documentation
Attachment B – Environmental Documentation
Attachment C – Site Plan, Preliminary Grading Plan, and Visual Simulations
Attachment D – Public Documentation

Attachment A – Planning Documentation

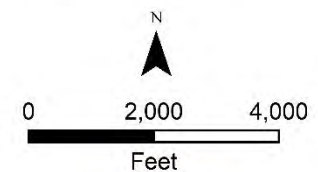
Valley Center Energy Storage PDS2020-STP-20-011

Vicinity Map

Valley Center
Community Plan Area

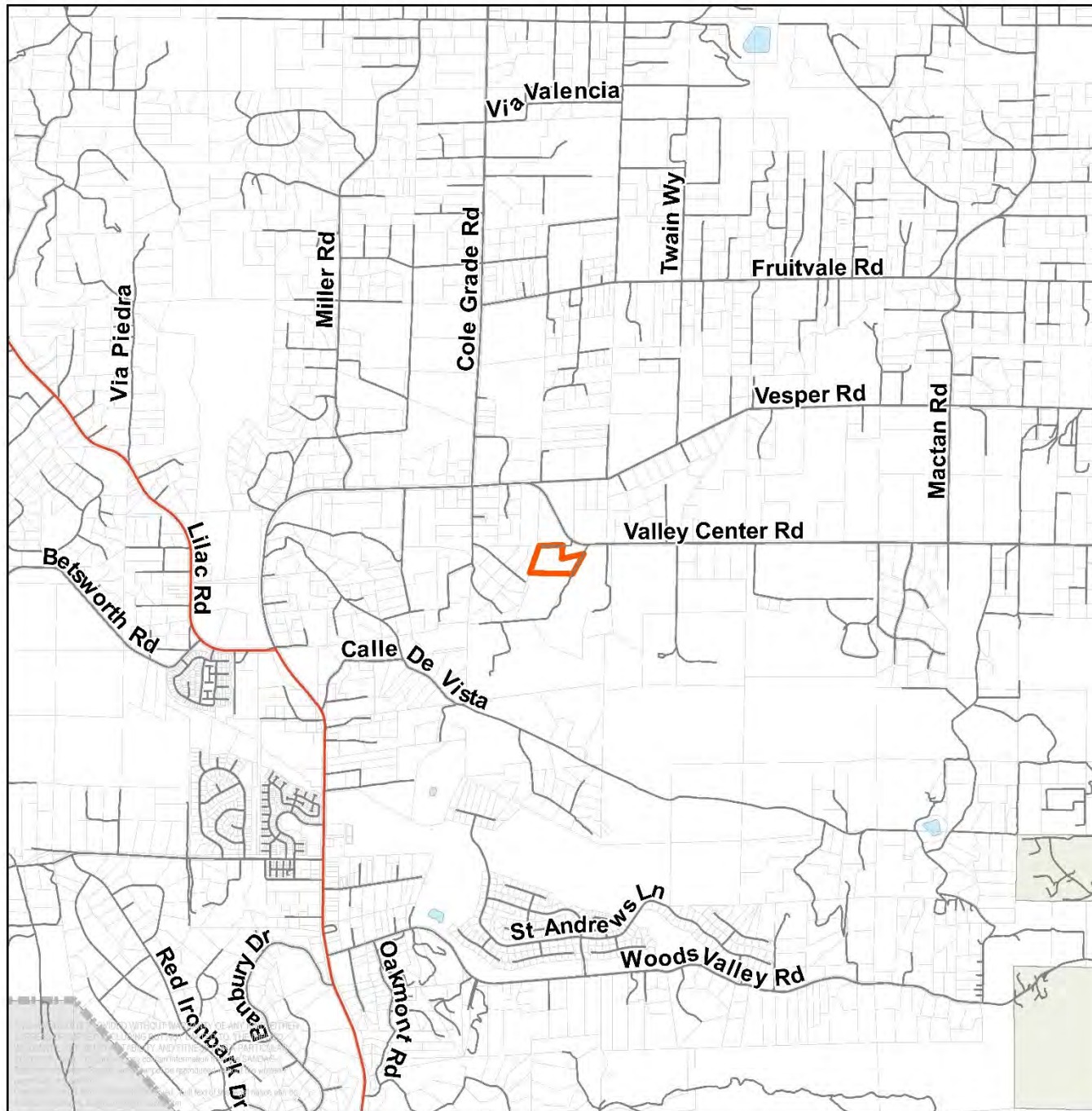


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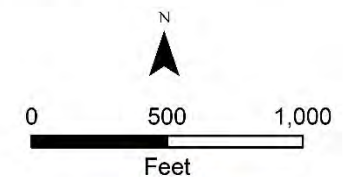
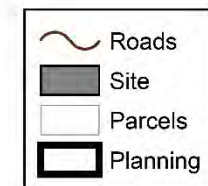
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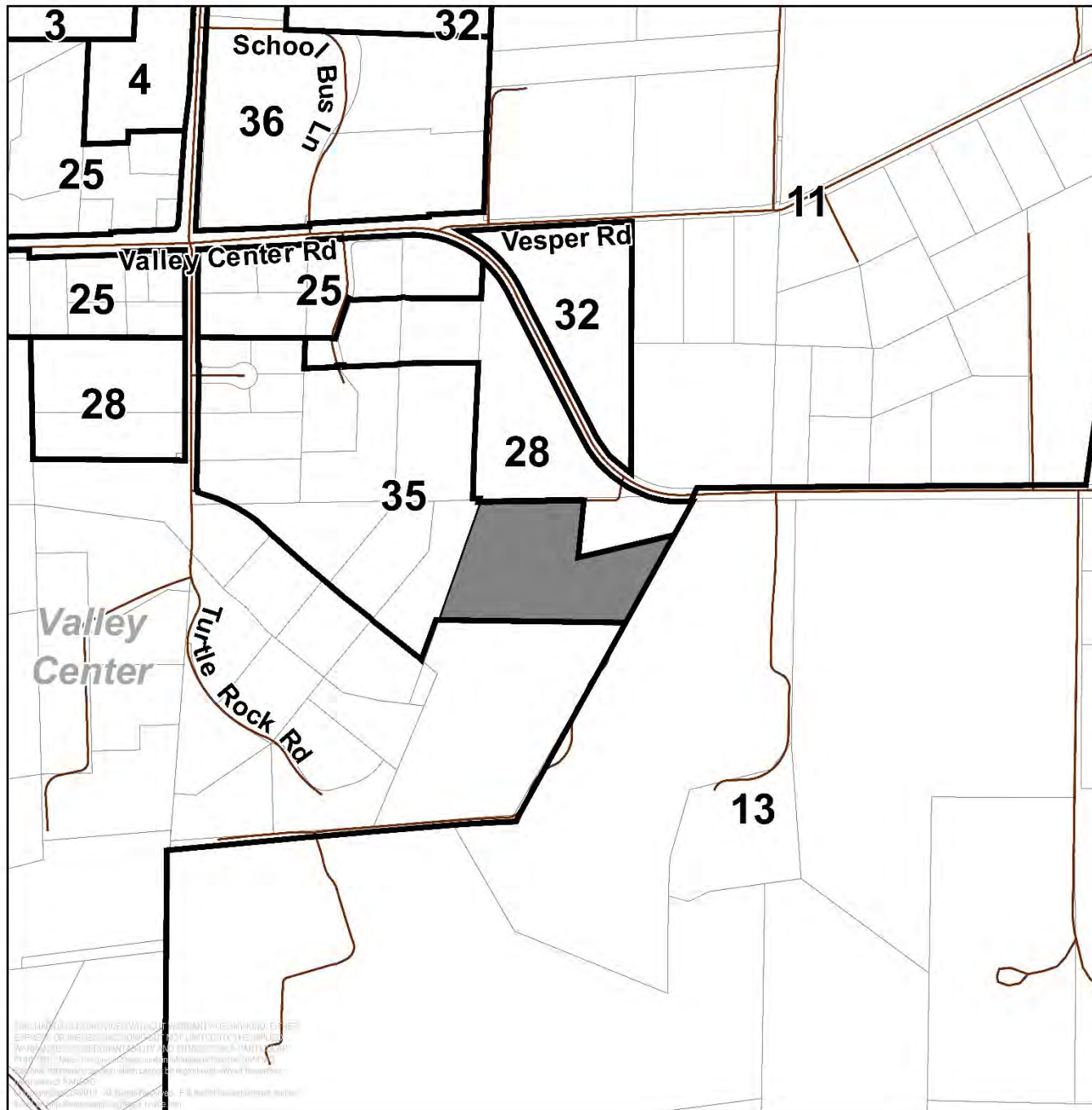
Valley Center Energy Storage
PDS2020-STP-20-011
General Plan

Valley Center
Community Plan Area

- (4) Village Residential (VR-10.9)
- (11) Semi-Rural Residential (SR-2)
- (13) Semi-Rural Residential (SR-4)
- (25) General Commercial
- (28) Limited Impact Industrial
- (32) Public/Semi-Public Facilities
- (35) Medium Impact Industrial
- (36) Open Space (Recreation)



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Valley Center Energy Storage PDS2020-STP-20-011

Zoning

*Valley Center
Community Plan Area*

A70 - Limited Agricultural

C34 - General

Commercial/Residential

C36 - General Commercial

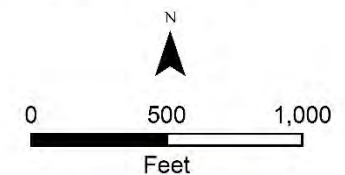
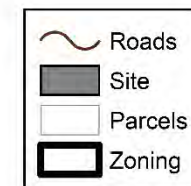
C40 - Rural Commercial

M52 - Limited Impact Industrial

M54 - General Impact Industrial

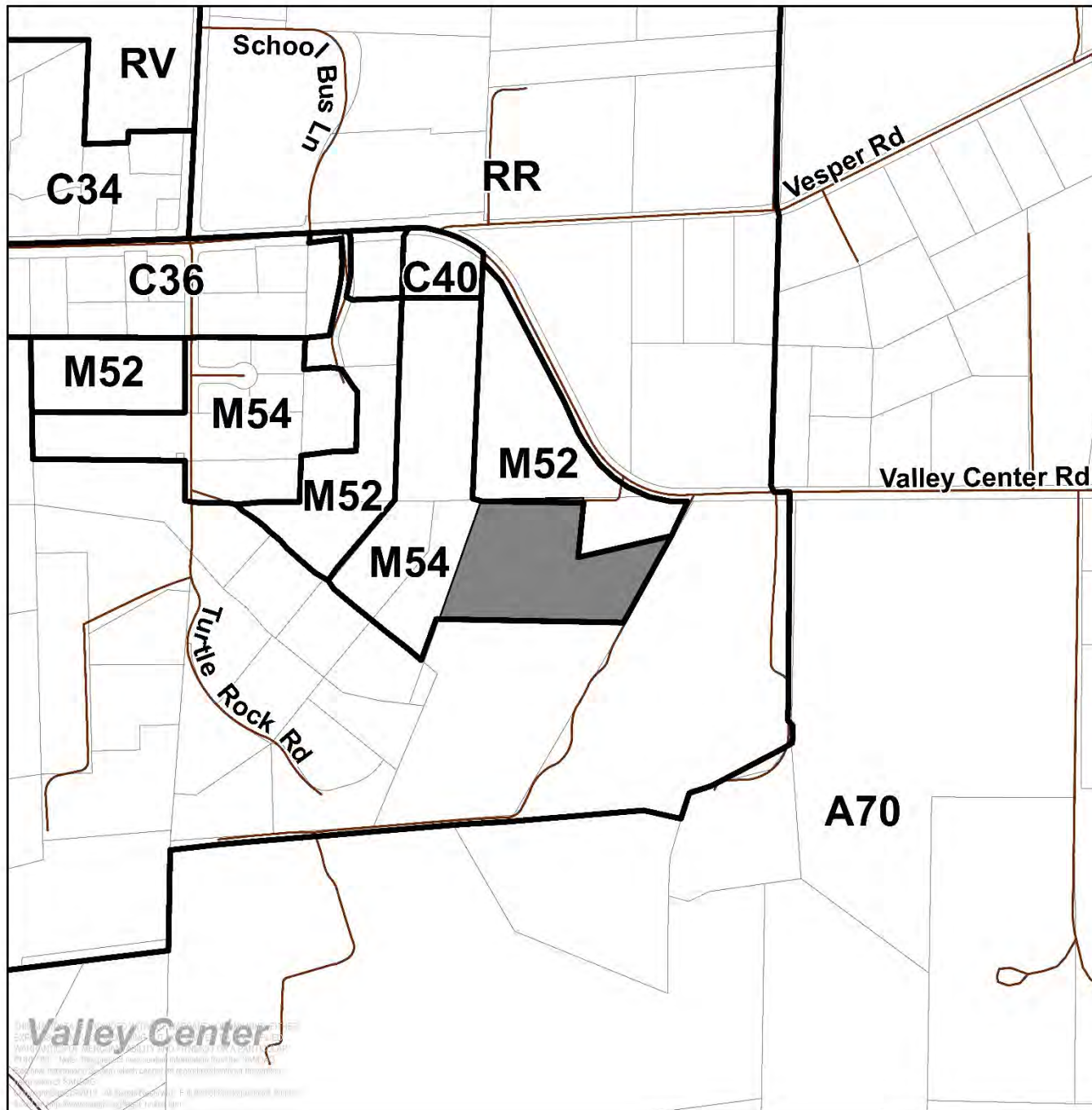
RR - Rural Residential

RV - Variable Family Residential



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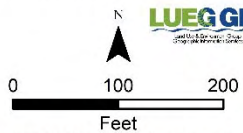
Valley Center

Valley Center Energy Storage PDS2020-STP-20-011

Valley Center Community Plan Area

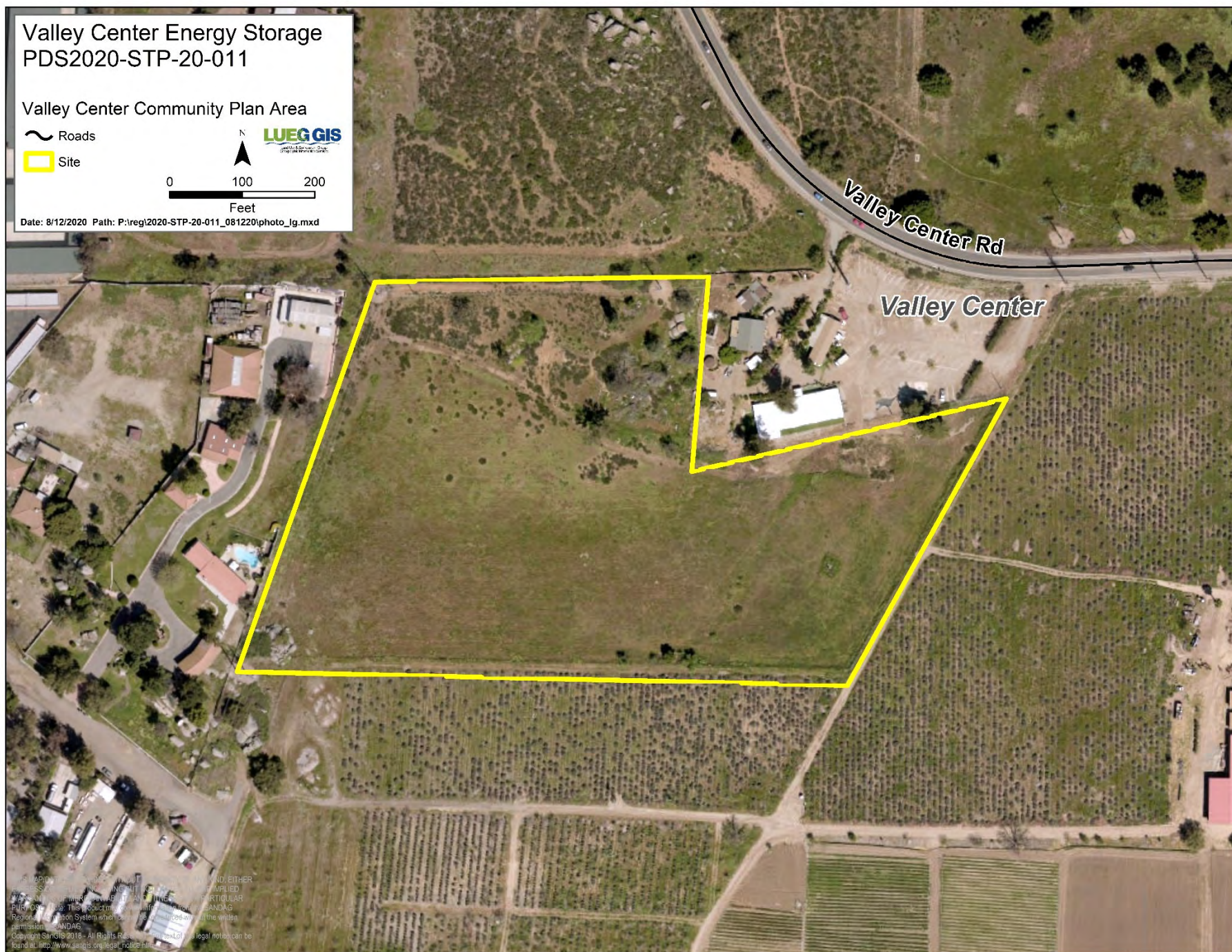
~ Roads

Site



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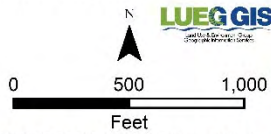
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Valley Center Energy Storage PDS2020-STP-20-011

Valley Center Community Plan Area

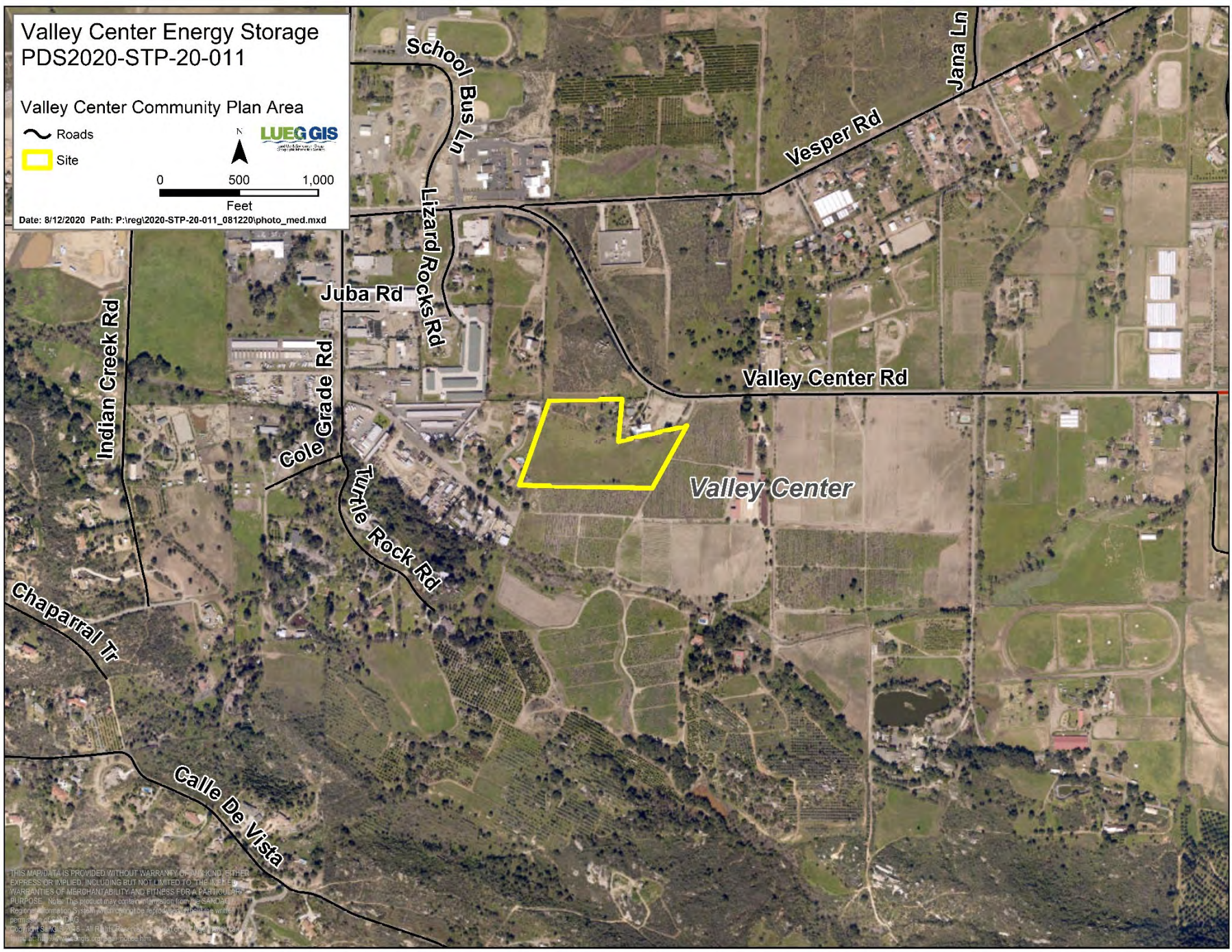
~ Roads

Site



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Attachment B – Environmental Documentation



County of San Diego

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DIRECTOR

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ASSISTANT DIRECTOR

~~June 25, 2020~~
August 27, 2020

Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183

Project Name: Valley Center Energy Storage
Project Record Numbers: PDS2020-STP-20-011
Environmental Log Number: PDS2020-ER-20-08-005
Habitat Loss Number: PDSXXXX-HLP-XXX

Lead Agency Name and Address:
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123-1239

County Staff Contact:
Regina Ochoa, Project Manager
(858) 495-5338
regina.ochoa@sdcounty.ca.gov

Project Location:
29523 Valley Center Road, Valley Center Community Planning Area
County of San Diego, 92082
Thomas Guide Coordinates: Page 1090, Grid G/2
APN: 189-013-20-00

Project Applicant Name and Address:
Valley Center ESS, LLC
1455 El Camino Real, Suite 160
San Diego, CA 92130

General Plan

| | |
|------------------------|--------------------------------|
| Community Plan: | Valley Center |
| Regional Category: | Village |
| Land Use Designation: | Medium Impact Industrial (I-2) |
| Density: | N/A |
| Floor Area Ratio (FAR) | 0.50 |

Zoning

| | |
|-------------------------|---------------------------------|
| Use Regulation: | General Impact Industrial (M54) |
| Minimum Lot Size: | 6,000 square feet |
| Special Area Regulation | Community Design Review (B) |

Description of Project:

The proposed project, Valley Center Energy Storage, consists of a Site Plan (STP) to construct a battery energy storage system (BESS) facility capable of delivering 140-megawatts (MW) for a 4-hour period and associated improvements (Project). Project improvements include a private road and utility easement, generation tie line (gen-tie line), fire hydrant, security lighting, 8-foot tall vinyl fence, and a stormwater basin. The Project site would be located on an 8.9-acre parcel at 29523 Valley Center Road in the Valley Center Community Planning area of the County of San Diego. Access would be provided through a 60-foot private road and utility easement located off Valley Center Road. Grading for the Project would be balanced onsite, requiring the even cut and fill of approximately 4,470 cubic yards of material. The Project is anticipated to begin construction in the fourth quarter of 2020 and is anticipated to be in operation by August 1, 2021.

Project Components

Project component information has been provided based on battery technologies under consideration, however, a vendor has not yet been selected and Project component details may vary between vendors and technologies. If battery technology substantially changes, additional analysis and a Site Plan minor deviation or modification may be required. The Project would utilize advanced technology batteries and control system contained within a solid, 8-foot tall vinyl fence. The proposed BESS would consist of 58 sets of 4, 31.6-foot long, 5.7-foot wide, and 8.6-foot tall, battery storage containers on dedicated foundations. Each container would consist of integrated battery, heat/fire and safety management systems, including electrical and mechanical controls, heat, ventilation and air condition (HVAC), fire alarm detection and heat management systems. Low voltage cables would connect from the BESS containers to pad- inverter/transformers located adjacent to the BESS units, and to a control center enclosure called a Power Distribution Center (PDC).

The detailed list of major equipment is as follows:

- 58 sets of 4 BESS enclosures including battery modules and integrated battery, fire and safety management systems.
- 58 pad-mounted inverter/transformers located adjacent to each set of BESS enclosures to convert direct current into alternative current and step the units' voltage up to 34.5 kilovolt (kV).
- 2 PDC enclosures which are modular electrical equipment enclosures housing energy management systems, communications/supervisory control and data acquisition (SCADA) equipment, and other electrical equipment.
- A Battery Step-Up Transformer (BSU), circuits will enter the BSU from the PDC at 34.5 kV where voltage will be stepped up to 69kV.
- An approximately 0.3-mile 69kV gen-tie line will be constructed from the Project BSU north across Valley Center Road to San Diego Gas and Electric (SDG&E) 69kV Valley Center Substation across one of four alignment options (described further below).

15183 Statement of Reasons

- Security lighting.
- A solid, 8-foot vinyl fence, flush to the ground with no gaps, would surround the Project site equipment and facilities for the exception of the stormwater drainage and retention basin.
- Stormwater drainage and retention basin.
- Signage.

The batteries would be charged from the California Independent System Operator (CAISO) grid via the Project's 0.3-mile underground gen-tie line to the 69kV Valley Center SDG&E Substation. The substation is located 0.3 miles north of the Project site, requiring the gen-tie line extension to cross under Valley Center Road. Energy stored in the Project would then be discharged back into the grid when the energy is needed, providing essential electricity reliability services to the local area.

Project Construction

Project construction includes site preparation and grading, installation of drainage and a retention basin, foundations/supports, setting battery enclosures, wiring and electrical system installation, and assembly of the accessory components including inverter transformers and generation step-up transformers. As previously stated, the Project would require the grading of approximately 4,470 cubic yards of soils, balanced on site with no net import or export. The 0.3-mile gen-tie line will be installed underground by the Project to the SDG&E 69kV Valley Center substation.

Project construction would occur between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday, and is anticipated to begin the fourth quarter of 2020 for a duration of 6 months. Construction personnel are expected to consist of 10 to 15 workers on average, depending on the construction activities. The following typical equipment is expected to be used during Project construction and commissioning:

- Excavator (2)
- Backhoe (2)
- Dozer (1)
- Roller/Compactor (1)
- Dump truck (2)
- Concrete mixer (3)
- Flatbed-mounted utility crane (1)
- Portable generator and welding equipment (1)
- Forklift (1)
- Pickup trucks (4)
- Utility line trucks (2)

Project Operations

The Project would be un-manned during operations, with no buildings or parking areas. Daily operations, monitoring, and dispatching would occur remotely. Staff of two to four people would periodically visit the site (bi-monthly) for routine inspection and maintenance of the facilities and site resulting in approximately 48 trips annually. Therefore, the Project would not require connection to sewer or restroom facilities. Any operational water that may be required for routine maintenance would be minimal and would be trucked in from offsite or sourced by Valley Center Municipal Water District (VCMWD) service. No groundwater would be used for any purposes during construction or operational phases of the Project. One Stormwater basin would be placed in a localized low point which exists in the southwest corner of the Project site. Fire services would be provided by the Valley Center Fire Protection District (VCFPD).

The facility is anticipated to have a Project life of approximately 30 years. At the end of the Project life, most of the Project's electrical equipment (breakers, transformers, inverters) would be removed and recycled. Project batteries would be returned to the battery manufacturer for recycling. Equipment foundations and pads would be demolished and removed.

Existing Conditions

In general, the site exhibits relatively flat topography with elevations ranging from 1376 feet above mean sea level (msl) in the northern portion of the site to 1364 feet above msl in the southwestern portion of the site. The climate can be characterized as Mediterranean type climate with generally mild, wet winters, with the bulk of annual precipitation falling between January and March. Long, hot and very dry summer seasons frequently occur with occasional, multi-year droughts. Onsite vegetation consists of disturbed land due to previous use as agriculture and a small area of low-quality CSS is present onsite consisting of 0.62-acre. No special features exist onsite including rock outcropping or geologic features.

Discretionary Actions:

The discretionary permit for the Project is a Site Plan (STP) for consistency with the Valley Center Design guidelines.

Overview of 15183 Checklist

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority

(SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

Summary of Findings

The Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Project, identified applicable mitigation measures necessary to reduce Project specific impacts, and the Project implements these mitigation measures (see http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the Project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the Project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the Project qualifies for an exemption because the following findings can be made:

1. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

The Project would place a BESS facility on the proposed site. No density is proposed for the Project. The Project site is designated as Medium Impact Industrial (I-2) by the County General Plan and M54 by the County Zoning Ordinance. These use regulations allow for unenclosed commercial and industrial operations having potential nuisance characteristics such as construction, sales and services. The Project would fall under the land use category as a Minor Impact Utility, defined as public utilities which have a local impact on surrounding properties and are necessary to provide essential services. All Minor Impact Utilities, including the Project, are permitted uses within the M54 and I-2 use regulations. Because the Project is a “by right” permitted use and consistent with the M54 and I-2 use regulations, it is consistent with the development density established by the General Plan and the certified GPU EIR. The Project is also consistent with the land use designations in the Valley Center Community Plan which are Public/Semi-Public Facilities or Public/Semi-Public Lands.

2. There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR Failed to analyze as significant effects.

As explained through the 15183 Checklist below, the subject property is comparable to other properties in the surrounding area, and there are no Project specific effects which are peculiar

to the Project or its site. The Project site is located in an area developed with similarly sized industrial uses. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects that were not anticipated in the previously certified EIRs.

In addition, as explained further in the 15183 Checklist below, all Project impacts were adequately analyzed by the GPU EIR. The Project could result in potentially significant impacts to Air Quality, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Transportation and Traffic, and Wildfire. However, applicable mitigation measures specified within the GPU EIR have been integrated into the Project as design features or have been made conditions of approval for this Project.

3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.

The Project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the Project, and as explained further in the 15183 Exemption Checklist below, no potentially significant offsite or cumulative impacts have been identified which were not previously evaluated.

4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

5. The Project will undertake feasible mitigation measures specified in the GPU EIR.

As explained in the 15183 exemption checklist below, the Project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through Project design, compliance with regulations and ordinances, or through the Project's conditions of approval.

| | |
|--|--|
| <hr/> Signature | <hr/> June 25, 2020 Date |
| <hr/> Jenna Roady Printed Name | <hr/> Land Use/Environmental Planner Title |

CEQA Guidelines §15183 Exemption Checklist

Overview

This checklist provides an analysis of potential environmental impacts resulting from the Project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the Project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked “Significant Project Impact” indicates that the Project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the Project would result in a Project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a Project impact is more severe than what had been anticipated by the GPU EIR.

A Project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|----------------------------------|--|-----------------------------------|
| 1. AESTHETICS – Would the Project: | | | |
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

The following documents have been prepared for the proposed project in relation to Aesthetics and have been incorporated into the below discussion:

- Visual Simulations and Character Photographs prepared by POWER Engineers, Inc. in April 2020.

1(a) The GPU EIR concluded this impact to be less than significant with mitigation. A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and to individual visual resources.

As described in the General Plan Update Environmental Impact Report (GPU EIR), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

The Project site is located within the Valley Center Community plan area at 29523 Valley Center Road, which is also a portion of State Route 6 (SR-6), a County Designated Scenic Corridor. For further information on scenic highways, refer to response 1(b). Valley Center has a number of RCAs with Lancaster Mountain - Keys Canyon - Lilac Creek being the closest with scenic value located .9 mile west of the project site. This RCA is a long, narrow area that is mainly important for the riparian and oak woodland habitats that exist in the stream bottom. However, Lancaster Mountain is a scenic landmark which contains mixed chaparral and wildlife habitat.

The segment of this RCA that is directly west, does not contain any trails which would afford views of the Project site. In addition, the Project site would not impact any views of this RCA because the Project is consistent with the use and height regulations of the County Zoning Ordinance and is surrounded by residential, industrial and commercial development.

As previously discussed, the GPU EIR determined impacts on scenic vistas to be less than significant with mitigation. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

No Scenic Highways designated by Caltrans are in proximity to the Project site. However, the County General Plan identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. The Project site is located along a County Scenic Highway, Valley Center Road. The segment includes Lilac Road as well and ranges from State Route 76 (SR-76) in Pala to SR-76 in Rincon Springs. Intermittent views from the roadway would be available as can be seen in the photo simulations. The Project site is buffered by an existing commercial use for Cruise Party Rentals as well as vegetation located directly north of the site along Valley Center Road. In addition, the Project would install a solid 8-foot vinyl fence around all Project components for the exception of the stormwater basin. The tallest Project component is the BSU at 26 feet tall; however, would be largely screened by the commercial structures located off Valley Center Road. The individual battery storage containers would have a height of 8.6 feet tall, where the tops of the battery storage containers can be seen intermittently traveling east through the above-mentioned commercial lot on Valley Center Road as well as traveling west prior to the commercial lot through the Project's proposed access. These observation points are described in detail in response 1(b), as key observation point (KOP) 1 and 2. Further east the topography raises in elevation but the embankment and vegetation on the southwestern side of Valley Center Road prohibits any views of the site. In addition, the Project site is zoned M54 and would comply with all zoning requirements such as height and setbacks, is consistent with surrounding development as described in response 1(a), and would not conflict with the Valley Center's Design Review Guidelines as discussed in response 11(b). Therefore, the Project would not substantially damage scenic resources without a scenic highway.

As previously discussed, the GPU EIR determined impacts on scenic resources to be less than significant with mitigation. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(c) The GPU EIR concluded this impact to be significant and unavoidable. Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the

viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers.

The Valley Center community is characterized as a scenic, rural community with a combination of agricultural uses, riparian valleys, open space and rolling hills scattered throughout the plan area. Surrounding the Project site, the existing visual character and quality is characterized by semi-rural residential lots located to the northeast, east and south, with commercial and industrial lots located to the north and west. Intermixed within the semi-rural residential lots lies open grasslands and agricultural use types. The Project site lies low in the valley on relatively flat terrain with a portion of Lancaster Mountain located .9 miles west as discussed in response 1(a).

Visual simulations and character photographs were prepared for the Project by POWER Engineers, Inc. in April 2020. The character photographs represent a variety of views in the local area including stand-alone local commercial and industrial uses such as Joe's Paving Company, Valley Center RV and Outside Storage, Cruise Party Rentals, Valley Center Self-Storage, Impact Auto #2, Joe's Paving Company, among others, as well as utility services (SDG&E and Valley Center Municipal Water District), and agricultural fields. In order to ensure proper screening of the Project site, two KOPs were established in the visual simulations through review of existing conditions and expected views of the Project site. The two KOPs are described below.

KOP 1 – Eastbound Valley Center Road

KOP 1 represents the view towards the Project site for roadway users traveling eastbound on Valley Center Road. Predominantly obstructed by the existing commercial operation, topography, and vegetation screening, as described in response 1(b), an intermittent view of the Project could be seen by roadway users. This view of the Project is expected to last only 1 to 2 seconds for roadway users traveling the speed of traffic. This view of the Project largely consists of the proposed vinyl fencing surrounding Project facilities. The proposed vinyl fencing has the appearance of a paneled wood fence, provides screening of the Project, and is consistent with the Valley Center Design Guidelines preference for wood or wrought iron fencing as compared to chain-link security fencing. Further, because the Project and the heights of its components, is located at a topography lower than that of Valley Center Road, unobstructed views of the landforms within the viewshed of Valley Center Road remain.

KOP 2 – Westbound Valley Center Road

KOP 2 represents views of the Project seen by roadway users traveling westbound on Valley Center Road. Views of the Project are predominantly obstructed by topography and vegetation screening. Views of the Project are expected to have a slightly longer duration than KOP 1; however, is expected to last under approximately 10 seconds for roadway users traveling the speed of traffic. Further, this view is only available seasonally as shown in Character Photos, Photo 22, during portions of the year when the adjacent eucalyptus operations are trimmed. At all other times of the year, growth of the eucalyptus will obstruct views of the Project. This view of the Project is also dominated by the proposed vinyl fencing as described further in KOP 1.

Therefore, because the Project is predominantly screened from public vantage points and is consistent with the visual character of the surrounding area, the Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. However, the Project would have a less than significant impact for

the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project is located 12 miles from the Palomar Observatory and is therefore within Zone A of the County of San Diego Light Pollution Code (within twenty miles of Mount Laguna Observatory or Palomar Observatory). However, the Project would use minimal outdoor lighting as required for security purposes in the California Building Code. The Project would not adversely affect nighttime views or astronomical observations because the Project would be required to conform to the Light Pollution Code. This would include the utilization of Zone A lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting.

The Light Pollution Code was developed by the County in cooperation with lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

As previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. However, the proposed Project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Aesthetics, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|----------------------------------|--|-----------------------------------|
| 2. Agriculture/Forestry Resources | | | |
| – Would the Project: | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

2(a) The GPU EIR concluded this impact to be significant and unavoidable. The Project site has land designated as Prime Farmland and Other Land by the Department of Conservation State Farmland Mapping and Monitoring Program (FMMP). A small portion of the Project site is also underlain with County of San Diego Farmland of Statewide Importance and Prime Soil Candidates. Historically, the site has not been used for agricultural purposes (orchard) since the 1950s and no active agricultural use types exist onsite today.

As previously stated, the site has been mapped by FMMP as Prime Farmland and Other Land. Only Prime Farmland is considered an important farmland category and covers 0.5-acre of the Project site. In order to qualify for Prime Farmland, the site must have been used for irrigated agricultural production at some time during the four years prior to the Important Farmland Map date and must be a minimum of 10 acres. FMMP maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance. The project site has not been used for agricultural purposes since the 1950s, as stated above, and has therefore been allocated an incorrect mapping category pursuant to the required criteria. Due to the widespread mapping effort by the DOC for the FMMP in California, categories may be inaccurately applied. In addition, FMMP is non-regulatory and was created for providing decision makers consistent and impartial data for use in assessing agricultural land resources in California.

In order to determine if a site is considered a significant agricultural resource in the County of San Diego, the County utilizes the Guidelines for Determining Significance for Agricultural Resources Local Agricultural Resources Assessment (LARA) model. The County's agricultural specialist has conducted a preliminary LARA model review of the project site. The LARA Model resulted in a high rating for climate, a moderating rating for soil, and a low rating for water. Pursuant to the Guidelines, if any of the aforementioned factors result in a rating of "low", the site would not be considered a significant agricultural resource due to the lack of all important "primary factors". Therefore, the Project site is not considered a significant agricultural resource pursuant to the County Guidelines.

Because the site has likely been allocated an incorrect mapping category, has not been used for agricultural operation since the 1950s, and is not considered a significant agricultural resource pursuant to the County's Guidelines, the Project would not convert an important farmland category or other agricultural resources to a non-agricultural use.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is zoned M54 which is not considered an agricultural zone. The Project site is also not located within a Williamson Act Contract or County Agricultural Preserve. The closest Agricultural Preserve to the Project site is located 1.4 miles northeast, and the nearest Williamson Act Contract is located 2.6 miles northwest. Due to distance, the Project would not conflict with any Williamson Act Contracts or Agricultural Preserves.

The Project site is adjacent to an active agricultural operation to the east that is zoned Rural Residential (RR) which allows for row and field crops. However, the Project site would be unmanned for the exception of periodic visits (bi-monthly) for routine inspection and maintenance. Therefore, no interface conflicts would occur with the adjacent agricultural use due to the Project.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(c) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR.

The project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore Project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located 8.6 miles to the east of the Project site. Therefore, due to distance, the Project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones.

As previously discussed, Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the project would have a less than significant impact for the reasons detailed above, the Project would not increase impacts identified within the GPU EIR.

- 2(d) Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR. However, as indicated in response 2(c), the Project site, or any off-site improvements, are not located near any forest lands. Therefore, because the project would have a less than significant impact for the reasons detailed above, the Project would not increase impacts identified within the GPU EIR.
- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. No agricultural operations are currently taking place on the Project site. In addition, no impacts would occur in association with interface conflicts due to Project distance from Williamson Act Contracts and Agricultural Preserves. The Project would not result in any interface conflicts with the adjacent active agricultural operation because the Project site would be unmanned as stated in response 2(b). In addition, no forest land would be impacted by the Project as stated in response 2(c) and 2(d). Therefore, the Project would not involve other changes in the existing environment that could result in conversion of Important Farmland or other agricultural resource to a non-agricultural or non-forestry use.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the NOP for the GPU EIR. However, because the project would have a less than significant impact to Forestry Resources for the reasons detailed above, the Project would not increase impacts identified within the GPU EIR. In addition, the Project would be consistent with the analysis within the GPU EIR for Agricultural Resources because it would not increase impacts to Agricultural Resources identified within the GPU EIR.

Conclusion

With regards to the issue area of Agricultural/Forestry Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|---|----------------------------------|--|-----------------------------------|
| 3. Air Quality – Would the Project: | | | |
| a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

The following study has been prepared for the proposed project and incorporated into the below discussion:

- Air Quality Analysis prepared by Ldn Consulting, Inc. on June 17, 2020.

Discussion

Air quality impacts related to construction and daily operations were calculated using the latest California Emissions Estimator Model (CalEEMod) 2016.3.2 air quality model, which was developed by BREEZE Software for the South Coast Air Quality Management District in 2017. The construction module in CalEEMod is used to calculate the emissions associated with construction of the Project and uses methodologies presented in the U.S. Environmental Protection Agency (EPA) AP-42 document with emphasis on Chapter 11.9. The AERMOD dispersion model was used to determine the concentration for air pollutants at locations near Project construction activities. Additionally, AERMOD was used to predict the maximum exposure distance and concentrations at those locations. Results of the analysis have been incorporated below.

- 3(a) The GPU EIR concluded this impact to be less than significant. The Regional Air Quality Strategy (RAQS) was developed by the San Diego Air Pollution Control District (SDAPCD) to provide control measures to try to reach criteria pollutant standards set by the State Implementation Plan (SIP). The RAQS relies on population and projected growth in the County, mobile, area, and all other source emissions in order to predict future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Mobile source emission projections and growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, projects that are consistent with the growth anticipated by the General Plan would be considered consistent with the RAQS. The Project is for the development of a battery storage

system that is consistent with General Plan land use designation I2 for which the GPU EIR was certified. Therefore, the Project was anticipated in RAQS and SIP and would not conflict or obstruct implementation of those plans.

As previously discussed, the GPU EIR determined impacts on air quality plans to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(b) The GPU EIR concluded impacts to be significant and unavoidable. Air quality emissions associated with the Project would include temporary and localized emissions of Particulate Matter, 10 micrometers or less (PM₁₀), nitrogen oxides (NO_x) and Volatile Organic Compounds (VOCs) from construction and grading activities. The Project would require the grading of approximately 4,470 cubic yards of material, with no import or export of material required. Pursuant to the Air Quality Analysis, the Project was found to have potentially significant health risk impacts from diesel exhaust during construction; however, the project would be required to use Tier 4 diesel equipment with diesel particulate filters as Project mitigation that would reduce daily construction emissions below County thresholds. This mitigation measure was identified by the GPU EIR Mitigation Measure 2.5 which requires additional construction measures for projects which exceed screening-level thresholds. Additionally, grading operations associated with Project construction would be subject to County of San Diego Grading Ordinance and the SDAPCD Rule 55, which requires implementation of measures that would reduce fugitive dust and diesel exhaust emissions.

Project Mitigation

Tier 4 Construction Equipment and Diesel Particulate Filters

- Diesel-powered equipment with more than 25 horsepower will be equipped with engines that meet or exceed either EPA or Air Resources Board (ARB) Tier 4 off-road emissions standards for particulate matter exhaust. An exemption from the Tier 4 requirement may be granted by the County in the event that the Developer documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from another construction equipment. Before an exemption may be considered by the County, the Developer shall be required to demonstrate that three construction fleet owners/operators in the San Diego region were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within the San Diego region.

Operational emissions sources would include vehicle emissions associated with the bi-monthly routine site inspection and maintenance visits. Thus, operational emissions have been determined to be minimal. Based on analysis of Project construction and operational activities, the Project would not result in substantial emissions such that any criteria pollutant air quality standard would be violated.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. However, the Project would have a less than significant impact to air quality violations with the incorporation of Project mitigation for the use of Tier 4 construction equipment with diesel particulate filters identified as GPU EIR Mitigation Measure Air-2.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively) for ozone (O₃). San Diego County is also presently in non-attainment for PM₁₀ and Particulate Matter less than or equal to 2.5 microns (PM_{2.5}) under the CAAQS. O₃ is formed when VOCs and NO_x react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ and PM_{2.5} in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The Project would contribute PM₁₀, PM_{2.5}, NO_x, and VOC emissions from construction/grading activities; however, the incremental increase would not exceed established thresholds as stated in response 3(b) above with the implementation of Project mitigation for tier 4 construction equipment and the use of diesel particulate filters identified as GPU EIR Mitigation Measure Air-2.5. In addition, grading activities associated with construction of the Project would be subject to the County of San Diego Grading Ordinance and the SDAPCD Rule 55, as also previously stated in response 3(b).

The Project would generate PM₁₀, PM_{2.5}, and NO_x emissions during Project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. Operational emissions would not be anticipated to exceed the County's thresholds due to minimal trips required. Furthermore, because the Project is proposing development consistent with the General Plan, it is correspondingly consistent with the RAQS and SIP. In addition, there are no known projects in the vicinity of the Project where construction activities involving demolition or grading would result in a cumulatively significant impact on air quality.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the Project would have a less than significant impact to non-attainment criteria pollutants with the incorporation of Project mitigation for tier 4 construction equipment and the use of diesel particulate filters identified as GPU EIR Mitigation Measure Air-2.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project boundary shares property lines with sensitive receptors. Five nearby single-family residences were represented in the modeling as sensitive receptors. The Project was found to have significant risk to sensitive receptors from diesel exhaust during construction, as there are known chronic, non-cancer health risks associated with diesel exhaust. Though, as previously discussed in response 3(b), the Project would be required to use at least tier 4 diesel equipment with diesel particulate filters to reduce daily construction emissions below County thresholds.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the Project would have a less than significant impact to non-attainment criteria pollutants with the incorporation of Project mitigation for use of tier 4 construction equipment with diesel particulate filters identified as GPU EIR Mitigation Measure Air-2.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(e) The GPU EIR concluded this impact to be less than significant. The Project could produce objectionable odors during construction of the residential components; however, these substances, if present at all, would only be in trace amounts (less than 1 µg/m³) and would be temporary. Operational odors would not be expected with the Project. Therefore, the Project would not create objectionable odors affecting a substantial number of people.

As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Air Quality, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Air 2.5) would be applied to the Project. This mitigation measure, detailed above, would require the Project to use tier 4 or better construction equipment with the use of diesel particulate filters.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|----------------------------------|--|-----------------------------------|
| 4. Biological Resources – Would the Project: | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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 Wildlife or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

The following studies has been prepared for the proposed project in relation to Biological Resources and incorporated into the below discussion:

- A Biological Letter Report was prepared for the Project by Chambers Group, Inc., dated June 2020.
- A Conceptual Revegetation Plan was prepared for the Project by Chambers Group, Inc. on June 24, 2020.

Discussion

4(a) The GPU EIR concluded this impact to be significant and unavoidable. Four vegetation communities, in addition to bare ground and rock, were documented within the Project site, offsite component (SDG&E substation gen-tie line), and surrounding parcels: disturbed habitat, non-native grassland, diegan coastal sage scrub (CSS) and extensive agriculture (row crops). While the Project site vegetation primarily consists of disturbed land due to previous use as agriculture, a small area of low-quality CSS is present onsite consisting of 0.62-acre. Pursuant to the biological technical report, no sensitive plant species would be impacted by the Project.

The Coastal California Gnatcatcher (CAGN) is a federally threatened species and a California Species of Special Concern which lives and breeds within California sagebrush dominant habitats as well as mixed scrub habitats. In order to determine if CAGN was present onsite or within the vicinity, field surveys were conducted in November 2019, March 2020 and June 2020. A solitary CAGN was detected within scrub habitat during the reconnaissance-level survey performed for the Project in November 2019, approximately 100 feet west of the Option B alignment of the gen-tie line and outside of any anticipated disturbance area. The solitary CAGN was heard calling and was likely foraging within the California buckwheat west of the Project area. After 5 minutes, the CAGN was not heard again and was not detected again for the remainder of the survey. No additional observations of CAGN occurred during the other mentioned surveys.

Although the solitary CAGN was heard calling from scrub habitat west of the Project area, this species is not expected to nest within the surrounding native habitat due to a lack of preferred nesting sites dominated by California sagebrush and a lack of habitat connectivity to patches of more favorable/higher-quality habitat. This was further corroborated by the April 2020 nesting bird survey and June 2020 focused CAGN survey, which found no active avian nests or nesting activity as well as no CAGN sightings within or adjacent to the Project area. The Biological Letter Report did find that CAGN may forage within the surrounding coastal sage scrub vegetation. However, the Project would be required to comply with the provisions under the Migratory Bird Treaty Act of 1918 (MBTA) and the California Fish and Wildlife Code through Project mitigation. In addition, the Project would mitigate for impacts to the 0.62-acre of onsite Coastal Sage Scrub either in the form of mitigation credits from an approved mitigation bank or through revegetation, enhancement and, if required by a Project condition, placement within a biological open space easement. If the Project applicant elects to satisfy the mitigation requirements through the revegetation and enhancement of habitat located on the Project site, a Final Revegetation Plan would be required as a condition of approval. In addition, temporary impacts due to construction of the gen-tie line would be restored to pre-Project conditions. The GPU EIR identified these mitigation measures as Bio-1.5 and Bio-1.6.

Project Mitigation

The following is a list of Project mitigation measures:

MBTA Compliance

- If grading, clearing, brushing, and/or construction activities occur during the breeding seasons for migratory birds and raptors (February 1 – August 31), survey(s) shall be conducted within 72 hours prior to project implementation by a qualified biologist to determine whether breeding birds occur in or within 500 feet of the impact areas.
- If it is determined at the completion of surveys that there are no nesting birds (includes nest building or other breeding/nesting behavior) within the potential impact area, project activities shall be allowed to proceed.
- If active nests or nesting birds are observed within the area, the biologist shall flag the active nests and construction activities shall avoid active nests until nesting behavior has ceased, nests have failed, or young have fledged. Construction near an active nest (within 300 feet for passerines, 500 feet for raptors, or as otherwise determined by a qualified biologist) shall either:
 - (1) be postponed until a qualified biologist determines the nest(s) is no longer active or until after the respective breeding season; or
 - (2) not occur until a temporary noise barrier or berm is constructed at the edge of the development footprint and/or around the piece of equipment to ensure that noise levels

are reduced to below 60 dBA or ambient noise levels. Decibel output may be confirmed by a County-approved noise specialist and intermittent monitoring would be required by a qualified biologist to ensure that conditions have not changed.

- If project activities are to resume in an area where they have not occurred for a period of seven or more days during the breeding season, an update survey for avian nesting will be conducted.

CSS Mitigation Credits or Revegetation

- Mitigation is required for the permanent impact to CSS interior form at a 1:1 ratio. The Project is required to either purchase 0.62-acre of CSS from an approved bank or enhance and revegetate onsite habitat. If offsite credit is selected, the Project would be required to utilize a San Diego County Conservation Bank with Signed Implementing Agreements with the USFWS and CDFW. If the latter is selected, a final revegetation plan will be required for the onsite CSS.

With the implementation of the above mitigation measures, the Project would not result in a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. The Project also determined impacts to be significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Bio-1.5 and Bio-1.6 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(b) The GPU EIR concluded this impacts to be significant and unavoidable. The Project site development footprint would be concentrated in previously disturbed areas where possible, conserving native habitat to the extent feasible.

Results of the reconnaissance-level survey identified no riparian habitat or special status plant species within the Project area. Additionally, the focused plant survey found no rare plants within or adjacent to the Project area. In accordance with the County's Resource Protection Ordinance (RPO), mitigation is required for permanent impacts that occur to CSS Interior form at a 1:1 ratio as described in response 4(a). Due to the low-quality and amount of non-native species within the Diegan Coastal Sage Scrub Interior form that is located within the Project site development footprint, a higher mitigation ratio is not required. The sensitive habitat areas to be impacted are along the interface between disturbed habitat and discontinuous patches of surrounding Diegan Coastal Sage Scrub Interior form. This habitat does provide foraging potential for native species; however, is not expected to support sensitive native bird or animal species.

Mitigation requirements for this Project may occur through enhancement, revegetation and, if required by a Project condition, placement within a biological open space easement, or through the purchase of mitigation credits as described in response 4(a). Revegetation involves a combination of hand seeding or hydroseeding, container plants, non-native weeding, and monitoring. The GPU EIR identified this mitigation measure as Bio-1.5 and Bio-1.6.

Temporary impacts are limited to disturbance associated with installation of the offsite underground gen-tie line. To varying degrees, the alignment options are located within or adjacent to bare ground, non-native grassland, and CSS of varying quality. These vegetative communities would be temporarily impacted during installation of the gen-tie line. Regardless of the alignment, those temporary impacts would be restored to pre-Project conditions and no mitigation is required. Restoration efforts will follow the prescribed actions as laid out in the Final Revegetation Plan.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. However, the Project was determined to have a less than significant impact with the incorporation of the GPU EIR mitigation measures Bio-1.5, and Bio-1.6. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. During the November 2019 jurisdictional waters evaluation, no known wetlands that may be subject to jurisdiction under the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), or California Department of Fish and Wildlife (CDFW) were observed within the Project area or larger survey area. Two topographical features of note exist within the Project site which may collect runoff from storm events. One feature consists of a depressional feature, also described as a “sump” located near the southern end of the Project-controlled easement onsite. This feature was dominated by upland vegetation and had no clear outlet. A second feature, a topographical depression, runs northeast to southwest along the central portion of the Project site. This second feature displays no surface hydrology and was dominated by upland vegetation. Pursuant to the Biological Letter Report, the two features do not qualify as “wetlands” under the County RPO. This is because the features do not support a predominance of hydrophytes (water plants) nor display surface hydrology. Therefore, the Project would not result in any impacts to County RPO, state, or federally protected wetlands.

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. The County General Plan and Valley Center Community Plan do not designate or identify any wildlife corridors within or surrounding the Project area. In addition, the Project site is bordered by industrial development and adjacent to the SR-78. Moreover, any Project lighting adjacent to undeveloped habitat would be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from such habitat in adherence with the County Light Pollution Code (County 2005). Lastly, as discussed in response 4(a), the Project would be conditioned to comply with the BMTA to ensure no impacts would occur to nesting and breeding birds. Therefore, no impacts to movement of any native resident or migratory fish or wildlife species would result from the Project.

As previously stated, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. The Project would have a less than significant impact with mitigation by incorporating the GPU EIR mitigation measures Bio-1.5 and Bio-1.6. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The Project site is located outside of the County's adopted South County Multiple Species Conservation Program but is located within the draft North County Multiple Species Conservation Program (draft NCMSCP). Therefore, consistency with the draft NCMSCP is not required. The Project is consistent with the County's Guidelines for Determining Significance for Biological Resources and the County's RPO. As previously mentioned in response 4(a), mitigation of 0.62-acre of CSS would be required as a condition of approval. The GPU EIR identified this mitigation measure as Bio-1.5 and Bio-1.6.

As previously discussed, the GPU EIR determined impacts on local policies and ordinances as well as habitat conservation plans and natural community conservation plans as less than significant. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Biological Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Bio-1.5 and Bio-1.6) would be applied to the Project. Those mitigation measures, detailed above, requires the Project applicant to abide by the MBTA, and conduct revegetation or purchase mitigation credits from an approved mitigation bank as detailed above.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|----------------------------------|--|-----------------------------------|
| 5. Cultural Resources – Would the Project: | | | |
| a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Directly or indirectly destroy a unique paleontological resource or site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

The following study has been prepared for the Project in relation to cultural resources and incorporated into the below discussion:

- A cultural resources report entitled, *Cultural Resources Phase I Survey and Phase II Evaluation for the Valley Center Storage Project; 29523 Valley Center Road, San Diego County, California*, prepared by Sandra Pentney of Chambers Group, Inc and dated June 2020.

Discussion

- 5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and surveys of the property by County approved archaeologist Sandra Pentney between November of 2019 and June of 2020, it has been determined that there are no impacts to historical resources because no historical structures are present on site. Because no resources are present, no mitigation is required.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. As the proposed Project would have a less than significant impact with no required mitigation for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist, Sandra Pentney (June 2020), it has been determined that there are archaeological resources present on the Project site. Six archaeological resources were avoided by project design (P-37-015414, P-37-017525, P-37-017526, P-37-017527, P-37-030999, and P-37-031002). A seventh archaeological resource was evaluated and determined not to be CEQA or RPO significant (P-37-000759). In addition, the Native American Heritage Commission (NAHC) was contacted for a listing of Native American Tribes whose ancestral lands may be impacted by the project. The NAHC response received was negative, indicating no sacred sites on record with the commission were present on the project property. A Native American Monitor was a part of the survey crew. The County approved archaeologist Sandra Pentney and County staff have reached out to the Tribes who have responded and requested to consult on the Project. So far,

one Tribe (Rincon) has requested consultation, a copy of the cultural study, and monitoring during project development.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: coordination with local agencies, institutions, and tribal governments to identify important resources; temporary fencing; and grading monitoring under the supervision of a County-approved archaeologist and a Luiseno Native American Monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5 and Cul-2.6. The project will be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

Conditions of Approval

The following list includes the Project conditions of approval:

Archaeological Monitoring Program

- Pre-Construction
 - Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction.
 - Pre-construction meeting to be attended by the Project Archaeologist and Luiseno Native American monitor to explain the monitoring requirements.
- Construction
 - Monitoring. Both the Project Archaeologist and Luiseno Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Luiseno Native American monitor. Both the Project Archaeologist and Luiseno Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources
 - If cultural resources are identified:
 - Both the Project Archaeologist and Luiseno Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project Archaeologist shall contact the County Archaeologist at the time of discovery.
 - The Project Archaeologist in consultation with the County Archaeologist and Luiseno Native American shall determine the significance of discovered resources.
 - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
 - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Luiseno Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
 - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Luiseno Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is

- infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
- Human Remains.
 - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Luiseno Native American monitor.
 - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
 - Rough Grading
 - Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
 - Final Grading
 - Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.
 - Cultural Material Conveyance
 - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.
 - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. However, the Project would have a less than significant impact to historic resources with the incorporation of Project conditions for grading monitoring, identified as GPU EIR Mitigation Measure Cul-2.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(c) The GPU EIR concluded this impact to be less than significant. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the Project would have a less than significant impacts for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations of quaternary alluvium that potentially contain unique paleontological resources. Proposed grading would include more than 2,500 cubic yards of excavation which has the potential to impact fossil deposits.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and conformance with the County's Paleontological Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

As previously discussed, the GPU EIR determined impacts on paleontological resources as less than significant with mitigation. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of cultural/paleontological resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-2.5, 2.6, and 3.1) would be applied to the Project. This mitigation measure, detailed above, requires the Project to implement monitoring during grading with a County-approved archaeologist and a Native American observer and requires conformance with the County's Cultural Resource Guidelines if resources are encountered.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|---|----------------------------------|--|-----------------------------------|
| 6. Energy Use – Would the Project: | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and Greenhouse Gas (GHG), while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

- 6(a) CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use.

The Project would increase the demand for electricity and gasoline at the Project site during grading and construction, but usage would be minimal during Project operations. Natural gas is not expected to be needed during grading, construction or operations.

Grading and Construction

The grading required for the Project would be approximately 4470 cubic yards of even cut and fill. During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity and gasoline would be temporary and negligible; therefore, electricity and gasoline use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. Natural gas is not expected to be required during Project grading and construction.

The energy needs for the Project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction projects of this size. Additionally, the Project is consistent with the density established by the General Plan and Zoning Ordinance. Thus, the

Project's energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operational

As stated above, the Project would not increase the demand for electricity or natural gas at the Project site during operations. The Project does not include any permanent components that would increase demand for existing sources of energy except for gasoline usage for bi-monthly maintenance visits. The Project development of a battery storage facility would provide a secure and reliable electricity supply, improve community infrastructure, and support sustainable electricity generation. By building the Project, a clean, reliable resource would be gained to help integrate renewable energy sources, reduce dependence on gas-fired generation, eliminate ocean water for cooling, reduce freshwater consumption, and reduce GHG and criteria air pollutant emissions. Therefore, no significant impact to energy resources would result.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use, nor would it result in the wasteful, inefficient, or unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

- 6b. Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and reliance on fossil fuels. The Project, which comprises the building of a battery storage facility, would be part of a sustainable solution to enable increasing amounts of renewable energy generating sources to be accessed. Renewable energy is a focus of the County's Strategic Energy Plan; therefore, the Project would be in alignment with the County energy goals (County 2015). No conflicts with renewable energy or energy efficiency plans would occur and there would be no significant energy-related impacts from the Project.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

Conclusion

With regards to the issue area of Energy, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

7. Geology and Soils – Would the Project:

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|---|---|---|--|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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 an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

7(a)(i) The GPU EIR concluded this impact to be less than significant. The site is located in the tectonically active southern California area and will therefore likely experience shaking effects from earthquakes. The type and severity of the seismic hazards affecting a site are to a large degree dependent upon the distance to the causative fault, the intensity of the seismic event, and the underlying soil characteristics.

The Project is not located in a fault rupture hazard zone, identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California. The County Guidelines for Determining Significance for Geologic Hazards consider a project to have a potentially significant impact if a building or structure to be used for human occupancy would be placed within 50 feet of an Alquist-Priolo fault or County Special Study Zone Fault. The closest Alquist-Priolo Earthquake fault zone and County Special Study Zone Fault are located 7.5 miles northeast. In addition, no faults have been mapped within the project site.

The closest fault zones not classified as a Fault-Rupture Zone or County Special Study Zone to the Project site are located 1.4 miles southeast and 5.0 miles northeast. Each fault is classified based on the recency of movement; these two closest faults have been classified as pre-Quaternary, or movement that is older than 1.6 million years. Additionally, construction in accordance with the California Building Code Seismic Requirements would be required prior to the issuance of a building permit. Therefore, the Project would not result in impacts due to rupture of a known earthquake fault.

- 7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the Project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a geotechnical report with proposed foundation recommendation would be required to be approved before the issuance of a building permit per California Building Code Sections 1803 and 1804. The GPU EIR identified the standard condition of a Geotechnical Report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction.

Conditions of Approval

The following list includes the Project conditions of approval:

Geotechnical Report

- A California Certified Engineering Geologist shall complete a final soils report specific to the preliminary design of the proposed development and submit the final soils report to PDS. The findings shall be reviewed and approved by the Director of the County Department of Planning and Development Services or designee.

Therefore, with implementation of the above standard County requirement for compliance with the California Building Code and the County Building Code, it would ensure that the Project would not result in a significant impact due to strong seismic ground shaking or seismic-related ground failure.

- 7(a)(iii) The GPU EIR concluded this impact to be less than significant. The project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards but is not underlain by high shrink swell soils (expansive soils). As stated previously, the County requires a geotechnical report with proposed foundation recommendations to be approved prior to the issuance of a building permit. Therefore, the Project would not result in any impacts from liquefaction.

- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, the Project site elevations are relatively flat, ranging from 1376 feet above msl in the northern portion of the site to 1364 feet above msl in the southwestern portion of the site. In addition, the Project site would not be habitable. Therefore, no impacts would occur due to landslides.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. This determination was based on required consistency with all applicable federal, state and local standards and regulations. The proposed Project would have a less than significant impact with the incorporation of Project conditions for a geotechnical report as a standard condition of approval. The GPU EIR identified the standard condition of a Geotechnical Report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(b) The GPU EIR concluded this impact to be less than significant. According to the Soil Survey of San Diego County, the soils on-site are identified as alfisols and inceptisols, Fallbrook Sandy Loam (FaC2) and Visalia Sandy Loam (VaA), that both have a soil erodibility rating of severe. However, the Project would not result in substantial soil erosion or the loss of topsoil because the Project would be required to comply with the Watershed Protection Ordinance (WPO) and

Grading Ordinance which would ensure that the Project would not result in any unprotected erodible soils, would not alter existing drainage patterns, and would not develop steep slopes. Additionally, the Project would be required to implement Best Management Practices (BMPs) per the Priority Development Project Storm Water Quality Management Plan to prevent fugitive sediment. Please see section 10. Hydrology and Water Quality for a detailed discussion.

As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(c) The GPU EIR concluded this impact to be less than significant. Landslide Susceptibility Areas was discussed in response (a)(iv). As indicated in response (a)(iv), although the site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards, the potential for a Project impact from landslides would be considered low. This conclusion was based on the relative flat nature of the Project site and that the Project would be unmanned.

Lateral spreading is a principal effect from liquefaction which was discussed in response 7(a)(iii). As discussed in response 7(a)(iii), the project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, subsidence and collapse may be caused by unstable geological structures or conditions. However, the Project would be required to prepare a Geotechnical Report as described in response 7(a)(ii) and would be required to conform to the California Building Code to ensure no impacts would occur.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the proposed Project would have a less than significant impact with the incorporation of the standard Project condition for a Geological Soils Report, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(d) The GPU EIR concluded this impact to be less than significant. As stated in response 7(a)(ii) and 7(a)(iii), the Project site is not underlain with expansive soils and a Geotechnical Report would be required as a standard condition of approval.

As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. The Project does not propose any habitable structure that would require septic tanks or alternative wastewater disposal systems. Therefore, no impacts would occur.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Geology and Soils, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

8. Greenhouse Gas Emissions – Would the Project:

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|---|---|--|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

The following study has been prepared for the proposed project in relation to Greenhouse Gas Emissions and incorporated into the below discussion:

- Greenhouse Gas Screening Letter prepared by Ldn Consulting, Inc., dated June 22, 2020.

Discussion

8(a) The GPU EIR concluded this impact to be less than significant with mitigation.

GHG Overview

GHG emissions are said to result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons, and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

It should be noted that an individual project's GHG emissions would generally not result in direct impacts under CEQA, as the climate change issue is global in nature; however, an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130(f) states that an EIR shall analyze GHG emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

Proposed Project

Construction emissions associated with the Project would result from preparing and grading the site, followed by facility construction activities. Operational-related emissions would result primarily from vehicle exhaust emissions associated with maintenance crews traveling to and from the Project site for bi-monthly maintenance site visits. Indirect GHG uses would also be produced from offsite sources such as water conveyance and utilities.

GHG impacts related to construction and daily operations were calculated using the latest CalEEMod 2016.3.2 air quality and GHG model, which was developed by BREEZE Software for South Coast Air Quality Management District (SCAQMD) in 2017. By combining annual construction emissions and the expected operational emissions, the Project is estimated to generate emissions of approximately 4.70 metric ton of carbon dioxide equivalent (MTCO_{2e}) per year. The Project site is zoned as M54 use regulation which allows for manufacturing, processing, and assembly; warehousing and distribution; large equipment supply and sales; and other industrial or commercial activities. These uses would generally allow for a significantly higher number of daily employee trips, vendor trips, and direct customer trips which would generate higher levels of GHG emissions as compared to the unmanned Project. Therefore, since the Project would generate fewer emissions than allowed under the General Plan, a less than significant cumulatively considerable increase in GHG emissions would result.

Lastly, it should be noted that battery storage projects, such as this Project, assist the County in achieving goals within the General Plan to increase the uses of renewable energy sources and reduce non-renewable electrical and natural gas energy consumption. By adding battery storage to the utility grid, the utility can improve the electrical demand response within the County without using spinning reserve from a carbon burning power plant.

As previously discussed, the GPU EIR determined impacts to be less than significant with mitigation. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 8(b) The GPU EIR concluded this impact to be less than significant. As described above, the Project would not result in a cumulatively considerable contribution to global climate change. As such, the Project would be consistent with County goals and policies included in the County General Plan that address greenhouse gas reductions. Therefore, the Project would be consistent with emissions reduction targets of Assembly Bill 32 and the Global Warming Solutions Act. Thus, the Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

As previously discussed, the GPU EIR determined impacts to applicable regulation compliance to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Global Climate Change, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|---|---|---|--|
| 9. Hazards and Hazardous Materials – Would the Project: | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) 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, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

☐☐☐

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

☐☐☐

The following studies have been prepared for the proposed project in relation to Hazards and Hazardous Materials and have been incorporated into the below discussion:

- Draft Hazard Consequences Analysis prepared by Haley & Aldrich, Inc and peer reviewed by Stantec Inc., dated June 2020.
- Wildland Fire Protection Plan prepared by Santa Margarita Consulting, LLC, dated April 2020.

Discussion

9(a) The GPU EIR concluded this impact to be less than significant.

Transport and Storage

The Project would be required to comply with the Department of Environmental Health (DEH) requirements for transport and storage of hazardous chemicals and would be conditioned to prepare a Hazard Materials Business Plan (HMBP). The HMBP contains detailed information on the storage of hazardous materials at regulated facilities. Specifically, the HMBP includes an inventory of hazardous materials and site map is included detailing their location, an emergency response plan, and an employee-training program. The purpose of the HMBP is to prevent or minimize damage to public health, safety, and the environment, from a release or threatened release of a hazardous material. As part of the emergency response plan of the HMBP, emergency response personnel are provided information to help them better prepare and respond to chemical-related incidents at regulated facilities.

As the Certified Unified Program Agency (CUPA) for the County of San Diego, the Hazardous Materials Division (HMD) conducts routine inspections at facilities that are subject to the HMBP requirements. The purpose of these inspections is to ensure compliance with existing laws and regulations concerning HMBP requirements, to identify existing safety hazards that could cause or contribute to an accidental spill or release, and to suggest preventative measures designed to minimize the risk of a spill or releases of hazardous materials.

Project Condition of Approval

The following is the Project condition of approval:

HMBP

- The applicant shall submit a HMBP to the County DEH prior to building permit issuance.

The HMBP a standard condition of approval through DEH and is not considered mitigation. The HMBP was identified in the GPU EIR under section 2.7.2, Regulatory Framework, State, California Health and Safety Code (H&SC), Hazardous Materials Release Response Plans and Inventory.

Accident Conditions

Under normal operations, BESS facilities do not store or generate hazardous materials in quantities that would represent a risk to offsite receptors. In addition, the Project's preventative measures and state-of-the-art fire and safety systems, as described further below, make an accident condition very rare. Nevertheless, because lithium-ion BESS facilities do store energy, a battery thermal runaway can occur if a cell, or area within a cell, achieves elevated temperatures due to thermal failure, mechanical failure, internal/external short circuiting, and electrochemical abuse.

As previously stated, the Project's preventative measures, and state-of-the-art fire and safety systems, make a thermal runaway event very rare. The Project would utilize pre-engineered battery storage systems listed under UL 9540. UL 9540 contains safety standards for the system's construction (e.g., frame and enclosure, including mounting, supporting materials, barriers and more); the insulation, wiring, switches, transformers, spacing and grounding; safety standards for performance of over twenty different elements, such as tests for temperature, volatility, impact, overload of switches, and an impact drop test; and standards for manufacturing, ratings, markings, and instruction manuals. In addition to the many individual standards referenced, UL 9540 compliance requires a Failure Mode and Effects Analysis (FMEA) be performed and requires a test to ensure safe compatibility of the system's parts. This includes the UL1973 standard, in which a battery manufacturer must prove that a failed cell inside will not cause a fire outside the system. The Project would meet the UL9540 and industry standards for adequate separations, cascading protections, and suppression systems to limit failure to a single cell.

The Project is also subject to the requirements of Chapter 12 of the 2019 California Fire Code which requires that all BESS use an Energy Management System for monitoring and balancing cell voltages, currents and temperatures. The system must transmit an alarm signal if potentially hazardous temperatures or other conditions such as short circuits, over voltage or under voltage, are detected. The fire code also requires the use of appropriate fire-extinguishing and smoke detection systems, which will be incorporated into each of the Project's BESS enclosures.

As previously stated, under normal operations, BESS do not store or generate hazardous materials in quantities that would represent a risk to offsite receptors. However, further analysis was conducted to determine potential impacts resulting from a release of toxics from an unlikely but credible fire or thermal event at the Project site. The EPA's "Risk Management Program Guidance for Offsite Consequence Analysis" and the California Accidental Release Prevention (CalARP) recommend conducting an offsite consequence analysis to represent release scenarios that are possible to occur (although unlikely) under a variety of weather and wind conditions to determine the distance certain projects should be sited relative to sensitive uses. Modeling assumptions and meteorological conditions that are used for conduction of an off-site consequence analysis are specified in the California Code of Regulations (CCR), Title 19, Chapter 4.5, Article 2735.1 et seq.

A Hazard Consequences Analysis (HCA) was prepared by Haley & Aldrich, Inc. in June 2020 to present the results of an offsite consequence analysis associated with operation of the Project. The purpose of the HCA is to inform and identify potential risks from the Project for operations staff and first responders and to implement appropriate Project safety design features and fire risk mitigation measures. These features and mitigation measures are based on the quantities of hazardous chemicals that could be released during a BESS thermal runaway/fire event and the distance to the nearest sensitive receptors. The analysis was conducted using U.S. Environmental Protection Agency's "Areal Location Hazardous Atmospheres" ([ALOHA]; Version 5.4.7, September 2016) hazards modeling program to conduct plume analysis and exposure impacts. The study was peer reviewed by Stantec.

Based on information about a chemical release, ALOHA estimates how quickly the chemical will escape from containment and form a hazardous gas cloud as well as how that release rate may change over time. ALOHA can then model how the hazardous gas cloud will travel downwind, including both neutrally buoyant and heavy gas dispersion. If the chemical is flammable, ALOHA simulates pool fires, boiling liquid expanding vapor explosions, vapor cloud explosions, jet fires, and flammable gas clouds (where flash fires might occur). ALOHA evaluates different types of hazards depending on the release scenario such as toxicity, flammability, thermal radiation, and overpressure. ALOHA produces a threat zone estimate, or toxic endpoint, which is the distance a toxic vapor cloud, heat from a fire, or blast waves from an explosion, will travel before dissipating to the point where serious injuries from the short-term exposures will no longer occur. The distance of the toxic endpoint is based from the American Industrial Hygiene Association Emergency Response Planning Committee Emergency Response Planning Guidelines and the National Academy of Sciences Acute Exposure Guidelines.

According to the HCA, there are four hazardous substances that are potentially released during a thermal runaway/fire event within a BESS that could have an impact on sensitive receptors. The hazardous substances include hydrogen chloride (HCl), hydrogen fluoride (HF), hydrogen cyanide (HCN), and carbon monoxide (CO).

While the design failure event for this Project is a thermal runaway/fire event involving a single battery module, the HCA modeled a highly conservative case involving 1.5 battery racks. Because final manufacturer design and vendor selection has not been completed, a conservative estimate of 30 battery modules per rack was assumed. Using nighttime meteorological conditions, which represents the worst-case conditions, modeling results indicate that the event would generate a maximum toxic endpoint extending 17 yards (approximately 51 feet). Using daytime meteorological conditions, modeling results indicate that the maximum toxic endpoint would not exceed 10.9 yards (approximately 33 feet). All Project equipment would be set back at least 30 feet from property boundaries, resulting in a maximum toxic endpoint extending ~~eighteen~~ 21 feet from the Project boundary in nighttime conditions and three feet during daytime conditions. No schools or daycares are located within either of the ranges of the maximum toxic endpoint.

As previously stated, the HMBP would be required to also include an emergency response plan which is designed to minimize hazards to humans and the environment from a sudden release of hazardous waste, fires, or explosions. This includes required emergency response training for the VCFPD and staff. The emergency response plan requires immediate action take place if an event were to occur including notifying surrounding property owners and emergency responders. Operations staff at a remote facility would receive an alarm signal from the Energy Management System and immediately contact the VCFPD. As the VCFPD would have undergone training prior to Project operations, immediate action would be followed in

accordance with the emergency response plan. The VCFPD would also evacuate any potential receptors to a safe distance from the event in order to ensure public safety.

While the highly conservative toxic release model is reflective of an unlikely, but credible fire event, no schools or day cares would be impacted by the Project. In the unlikely event of thermal runaway, the Project's preventative measures and fire and safety systems are designed to limit the event to a single battery module as well as reduce the duration and intensity of an event, if it occurs.

As previously discussed, the GPU EIR determined impacts from transport, use, and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. The Project would have a less than significant impact through compliance with Chapter 12 of the 2019 California Fire Code and with implementation of the standard condition of a HMBP through DEH, as identified in the GPU EIR under section 2.7.2, Regulatory Framework, State, California Health and Safety Code (H&SC), Hazardous Materials Release Response Plans and Inventory. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(b) The GPU EIR determined impacts from hazards to schools to be less than significant. According to the County of San Diego's 2007 "Guidelines for Determining Significance, Hazardous Materials and Existing Contamination," which states that facilities would handle regulated substances subject to CalARP regulations and are located within 0.25-mile from a school or day care are required to prepare a hazard assessment to determine the effects of the regulated substance on surrounding land uses in the event of a release. According to these guidelines, the requirement for a hazard assessment is satisfied by preparing an offsite Consequence Analysis following 2009 "Risk Management Program Guidance for Offsite Consequence Analysis," as supplemented by guidance from CalARP.

A daycare, located at 29235 Valley Center Road, is approximately 0.24-mile from the northwest corner of the Project site. In addition, there are existing residences located to the north and west of the Project site; the nearest residence to Project is located adjacent to the Project's western property line. The Valley Center Elementary School is also located approximately 0.47-mile from Project site. As previously discussed in response 9(a), the Project would be adequately sited relative sensitive use types. No schools or daycares would be located within the worse-case condition maximum toxic endpoint from Project site.

As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. This conclusion was based on required compliance with applicable federal, state, and local regulations to hazardous materials. As the Project would have a less than significant impact for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(c) The GPU EIR concluded this impact to be less than significant. Based on the Department of Toxic Substances Control's EnviroStor database and the State Water Resources Control Board's Geotracker database, there are no known hazardous material sites within 0.25 mile of the Project site. The closest hazardous material site is a former leaking underground storage tank 0.4 miles northwest of the Project site; though, this case closed in 1999 (DTSC 2020; SWRCB 2020). Additionally, the Project does not propose structures for human occupancy and would comply with DEH requirements for the transport and storage of hazardous chemicals.

As previously discussed, the GPU EIR determined impacts from existing hazardous materials sites to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The closest airport to the Project site is the private Lyall-Roberts Airport approximately 6 miles northeast. The closest public airport is the rural Ramona Airport, approximately 14 miles southeast of the Project site. The proposed Project is not located within an airport land use plan, Airport Safety Zone, Avigation Easement, Overflight area, within a Federal Aviation Administration Height Notification Surface Area or within two miles of a public airport. Therefore, the project would not result in a safety hazard for people residing or working in the project area.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is not within one mile of a private airstrip. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The GPU EIR concluded this impact to be less than significant with mitigation.

Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County, including all cities and the County unincorporated areas.

The Project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

- 9(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.
- 9(f)(iii) OIL SPILL CONTINGENCY ELEMENT:
The Project is not located along the coastal zone.
- 9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:

The Project would not alter major water or energy supply infrastructure which could interfere with the plan.

9f)(v) DAM EVACUATION PLAN:

The Project site is not located within an identified dam inundation zone. Additionally, the development would not constitute a “Unique Institution” such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(g) The GPU EIR concluded this impact as significant and unavoidable. The Project is listed as a high fire hazard severity zone in the California Department of Forestry and Fire Protection (CALFIRE)’s designated Local Responsibility Area (CALFIRE 2020). A Wildland Fire Protection Plan (FPP) was prepared for the Project by Santa Margarita Consulting LLC and approved by the VCFPD. With implementation of the FPP, the Project would comply with County regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Additionally, the Maximum Travel Time allowed pursuant to the County General Plan’s Safety Element is 5 minutes. The closest VCFPD to the Project site is Fire Station 1 located at 28234 Lilac Road, 0.7 mile away. According to the FPP, the travel time from Fire Station 1 to the Project site is less than 2 minutes. Further, the Project facility would be unmanned and therefore would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. In addition, the Project would be required to submit a HMBP, as described further in response 9(a).

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. However, the proposed Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(h) The GPU EIR concluded this impact as less than significant. The Project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the Project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. There are none of these uses on adjacent properties. Therefore, the Project would not substantially increase current or future resident’s exposure to vectors, including mosquitoes, rats or flies.

As previously discussed, the GPU EIR determined impacts from vectors to be less than significant with mitigation. As the proposed project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Hazards and Hazardous Materials, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR as described above.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|---|---|---|--|
| 10. Hydrology and Water Quality – Would the Project: | | | |
| a) Violate any waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

The following technical studies were prepared for the project related to hydrology and water quality and have been incorporated into the below discussion:

- (1) A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP), prepared by Westwood Professional Services and dated June 22, 2019.
- (2) A Preliminary Drainage Study prepared by Westwood Professional Services and dated June 3, 2020.
- (3) A Floodplain Analysis prepared by Kimley-Horn and Associates, Inc. and dated April 21, 2020.

Discussion

- 10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development Projects have the potential to generate pollutants during both the construction and operational phases. For the Project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, storm water management plans are prepared for both phases of the development Project.

The Project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction and Land Disturbance Activities. Compliance with the General Construction Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) which would eliminate or reduce non-stormwater discharge offsite into storm drainage systems or other water bodies and require the implementation of best management practices (BMPs) throughout the Project construction period. Stormwater BMPs would be required to limit erosion, minimize sedimentation, and control stormwater runoff water quality during Project construction activities. The following is a list of examples of typical erosion control BMPs that the SWPPP would implement: hydraulic stabilization and hydroseeding on disturbed slopes; County Standard lot

perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; measures to control materials management and waste management, or other typical erosion control BMPs.

Compliance with the SWPPP would ensure that construction activities would not degrade the surface water quality of receiving waters to levels that would exceed the standards considered acceptable by the San Diego County Regional Water Quality Board. The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009.

The Project has also prepared a Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) to comply with all operational requirements. As outlined in the PDP SWQMP, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff to the maximum extent practicable. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

Conditions of Approval

The following list includes the Project conditions of approval:

SWPPP

- A SWPPP would be prepared in accordance with the National Pollutant Discharge Elimination Systems Construction General Permit adopted by the State Water Resources Control Board.

The Project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the Project would not create cumulatively considerable water quality impacts and addresses human health and water quality concerns. Therefore, the Project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the proposed Project would have a less than significant impact to water quality standards with the implementation of a Project condition and compliance with local and state requirements as detailed above. These requirements were identified by the GPU EIR as mitigation measures Hyd-1.2 through Hyd-1.5 for implementation of Low Impact Development Standards (LID), compliance with the Watershed Protection Ordinance (WPO), the Best Management Practices Design Manual, and the County Guidelines for Determining Significance for Surface Water Quality, Hydrology and Groundwater Resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project lies in the Rincon sub-basin (903.16) of the San Luis Rey hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of this watershed is impaired including the San Luis Rey Hu, San Luis Rey River (lower), and Keys Creek. Constituents of concern in the San Dieguito

watershed include benthic community effects, indicator bacteria, bifenthrin, chloride, nitrogen, phosphorus, total dissolved solids, toxicity and trash. The Project could contribute to release of these pollutants; however, the Project would comply with the WPO and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters. These requirements were identified by the GPU EIR as Mitigation Measures Hyd-1.2 through Hyd-1.5.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the proposed Project would have a less than significant impact to water quality standards with the implementation of a Project condition and compliance with local and state requirements. These requirements were identified by the GPU EIR as mitigation measures Hyd-1.2 through Hyd-1.5 for implementation of Low Impact Development Standards (LID), compliance with the Watershed Protection Ordinance (WPO), the Best Management Practices Design Manual, and the County Guidelines for Determining Significance for Surface Water Quality, Hydrology and Groundwater Resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 9(a) and 9(b) above, the Project would implement erosion control BMPs during grading and construction, as well as site design, source control, and structural BMPs during operations, to ensure water standards quality standards and requirements are met.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed Project would have a less than significant impact to water quality standards and groundwater supplies and recharge with the implementation of a Project condition and compliance with local and state requirements. These requirements were identified by the GPU EIR as mitigation measures Hyd-1.2 through Hyd-1.5 for implementation of Low Impact Development Standards (LID), compliance with the Watershed Protection Ordinance (WPO), the Best Management Practices Design Manual, and the County Guidelines for Determining Significance for Surface Water Quality, Hydrology and Groundwater Resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project would obtain its water supply during grading and construction from VCMWD that obtains water from surface reservoirs or other imported sources. In addition, if water is required during Project operations for maintenance, the amount required would be minimal and would also be provided by VCMWD. The Project would not use groundwater to fulfill water requirements. In addition, the incremental amount of impervious surface that would be introduced by the Project would be small and would not substantially interfere with groundwater recharge.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the Project would have a less than significant impact to water quality standards and groundwater supplies and recharge with the implementation of a Project condition and compliance with local and state requirements as detailed above. These requirements were identified by the GPU EIR as mitigation measures Hyd-1.2 through Hyd-1.5 for implementation of LID, compliance with the WPO, the Best Management Practices Design Manual, and the County Guidelines for Determining Significance for Surface Water Quality, Hydrology and Groundwater Resources.

Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is gently sloped to the south with all water flowing into the adjacent Keys Canyon Creek. Keys Canyon Creek flows approximately 500 feet to the south of the Project site at its closest point. Floodplain delineation and mapping for Keys Canyon Creek were completed by the Federal Emergency Management Agency (FEMA) and the County of San Diego Flood Control. The creek has been mapped through the eastern portion of the Project site. However, the Project site is subject to concentrated flows that originate along Valley Center Road which discharge through an existing culvert along the westbound lane of Valley Center Road to the north of the Project site. According to the duplicative analysis performed for the Floodplain Analysis, the floodplain associated with the Keys Canyon Creek flows through the site, but in an isolated channel versus the previously predicted swath. Due to the above information, the Project would be required to obtain a Conditional Letter of Map Revision (CLOMR) and a Letter of Map Revision (LOMR) as a Project condition of approval pursuant to FEMA to ensure no impacts would occur. This condition was identified by the GPU EIR as Mitigation Measure Hyd-6.1.

Project Condition of Approval

CLOMR/LOMR

- The Project would be required to obtain a CLOMR and LOMR subject to approval by the County and FEMA prior to Project operations.

In addition, a localized low point exists in the southwest corner of the Project site where one new stormwater basin will be placed. The general location of overland flow would be similar to existing conditions; all water would be discharged to the same downstream area. In addition, because storm water management plans are prepared for both the construction and operation phases of the development Project as described in response 10(a) and 10(b), the Project would not result in substantial erosion or siltation on or offsite. The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. The Department of Public Works would ensure that these plans are implemented as proposed. In addition, the Project has been designed consistent with the GPU EIR Mitigation Measures Hyd-3.1 through Hyd-3.3 and Hyd-6.1. These measures require development to be located away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, maximize natural drainage and topography when conveying stormwater, comply with the Resource Protection Ordinance (RPO), as well as the Grading, Clearing, and Watercourses Ordinance. Therefore, the Project would not alter the course of a stream or river in a manner which would result in substantial erosion or siltation on or offsite.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the proposed Project would have a less than significant impact to erosion or siltation with project conditions and compliance with local and state requirements. These requirements were identified by the GPU EIR as Mitigation Measures Hyd-1.2 through Hyd-1.5 for implementation of LID, compliance with the WPO, the Best Management Practices Design Manual, and the County Guidelines for Determining Significance for Surface Water Quality, Hydrology and Groundwater Resources. The Project is also consistent with the GPU EIR Mitigation measures Hyd-3.1 through Hyd-3.3 and Hyd-6.1 as discussed above. Therefore,

the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Drainage Study determined that the Project would not alter the existing drainage pattern in a manner which would result in flooding on- or off-site. The Drainage study performed existing and proposed condition analyses which illustrated that there is an increase in the amount of runoff generated from the proposed condition. In order to ensure the additional runoff generated would not alter the rates downstream, a bioretention basin is proposed to capture the peak runoff rates from the project site. The basin would be adequately sized to attenuate Project peak flow rates in the event of a 100-year storm event at a rate less than existing conditions.

As previously discussed in response 10(e), a mapped FEMA and County floodplain exists in the eastern portion of the site. However, the Project would not place housing within a floodway, floodplain, or 100-year flood area as no housing is proposed. The Project would be conditioned to obtain a CLOMR and LOMR as Project conditions of approval pursuant to FEMA to ensure no impacts would occur.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The proposed Project would have a less than significant for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-6.1 for compliance with the RPO. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Drainage Study, the proposed Project would detain stormwater onsite and would not increase peak flows due to the proposed bioretention basin. The basin would capture the peak runoff rates from the project site at a rate less than existing conditions as discussed in response 10(f) above. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the proposed Project would have a less than significant impact to erosion or siltation with Project conditions and compliance within local and state requirements identified by the GPU EIR as Mitigation Measures Hyd-1.2 through Hyd-1.5. In addition, as previously discussed the Project has been designed consistent with GPU EIR Mitigation Measures Hyd-3.1 through Hyd-3.3 and Hyd-6.1. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The Project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

As previously discussed, the GPU EIR determined impacts to water quality standards and requirements as significant and unavoidable. However, the Project would have a less than significant impact to water quality standards with Project conditions and compliance with local and state requirements identified by the GPU EIR as Mitigation Measures Hyd-1.2 through Hyd-1.5. In addition, as previously discussed the Project has been designed consistent with GPU EIR Mitigation Measures Hyd-3.1 through Hyd-3.3 and Hyd-6.1. Therefore, the Project would be

consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. As previously discussed in response 10(e) and 10(f), a mapped FEMA and County floodplain exists in the eastern portion of the site. However, the Project would not place housing within a floodway, floodplain, or 100-year flood area as no housing is proposed. Therefore, impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. As the proposed Project would have a less than significant impact to flood hazard areas with implementation of Project condition identified by the GPU EIR Mitigation Measure Hyd-6.1, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. As previously discussed in response 10(e) and 10(f), the Project would be conditioned to obtain a CLOMR and LOMR as Project conditions of approval pursuant to FEMA. As part of this review, the Project would be required to ensure that structures are placed at least one foot above the floodplain elevations. Additionally, as the basin is providing flood control as well, the basin would also be subject to the requirements identified within the Hydraulic Design Manual which requires 1-foot of freeboard when passing the 100-year storm event. Therefore, the Project would place structures within a 100-year flood hazard area which would impede or redirect flood flows.

As previously discussed, the GPU EIR determined impacts to flood hazard areas as less than significant with mitigation. The proposed Project would have a less than significant for the reasons detailed above and is consistent with GPU EIR mitigation measure Hyd-6.1. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not place housing within a floodway, floodplain, or 100-year flood area as no housing is proposed. In addition, all structures would be designed at least one foot higher than the adjacent 100-year water surface elevations. All grading would also be required to meet the County and FEMA hydraulic regulations. Therefore, no impacts would occur from the 100-year flood.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area and emergency response and evacuation plans as less than significant with mitigation. As the proposed Project would have a less than significant impact for the reasons detailed above, and is consistent with GPU EIR mitigation measure Hyd-6.1, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(l) The GPU EIR concluded this impact to be less than significant with mitigation. The County Office of Emergency Services maintains Dam Evacuation Plans for each dam operational area. These plans contain information concerning the physical situation, affected jurisdictions, evacuation routes, unique institutions and event responses. If a "unique institution" is proposed,

such as a hospital, school, or retirement home, within dam inundation area, an amendment to the Dam Evacuation Plan would be required.

The Project site is not located within a dam inundation area. In addition, the development would not constitute a “Unique Institution” such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans. The Project would not interfere with the adopted Dam Evacuation Plan. Therefore, impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(m) The GPU EIR concluded this impact to be less than significant with mitigation.

10(m)(i) SEICHE: The Project site is not located along the shoreline of a lake or reservoir.

10(m)(ii) TSUNAMI: The Project site is not located in a tsunami hazard zone.

10(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 6(a)(iv).

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. However, the proposed Project would have a less than significant impact for the reasons detailed above and is consistent with GPU EIR Mitigation Measures Hyd-3.1 and Hyd-3.2. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Hydrology and Water Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5, Hyd-3.1 through Hyd-3.3, and Hyd-6.1) have been applied to the Project. The mitigation measures, as detailed above, requires the Project applicant to comply with development requirements of locating the Project away from ridgelines, conforming to natural topography, not significantly altering dominant physical characteristics of the site, maximize natural drainage and topography when conveying stormwater, complying with the RPO, the Grading, Clearing, and Watercourses Ordinance, LID Standards, WPO, Stormwater Standards Manual, and the County Guidelines for Determining Significance for Surface Water Quality, Hydrology and Groundwater Resources.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|---|----------------------------------|--|-----------------------------------|
| 11. Land Use and Planning – Would the Project: | | | |
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is an undeveloped parcel zoned as M54 and designated as I-2 by the County General Plan. During the establishment of the County General Plan and Zoning Ordinance, a variety of industrial activities were anticipated for these designations; therefore, the Project is an anticipated use onsite. Moreover, the Project is similar to surrounding land uses which include light and medium impact industrial, as well as public- semi-public facilities due to the SDG&E Valley Center Substation across Valley Center Road. The Project would include construction of a private road but does not propose the introduction of major infrastructure such as public roadways, facilities, or water supply systems. The battery storage system would aid the existing utility grid by storing electricity to improve SDG&E's electric demand response within the County. Therefore, the Project would not physically divide an established community.

As previously discussed, the GPU EIR determined impacts from physically dividing an established community as less than significant with mitigation. However, the proposed Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

11(b) The GPU EIR concluded this impact to be less than significant. As previously discussed in response 11(a), the Project aligns with the County's General Plan and Zoning Ordinance as it would implement a land use consistent with the M54 and I-2 land use designations for the Project site. Further, the Project is consistent with the Valley Center Community Plan's Industrial Goal focused on "well planned and contained industrial uses which are clean, non-polluting, and compatible with the rural low density residential character of the community", as the battery storage facility would expand use of renewable energy resources in the area (Valley Center 2011). The Project would also uphold and execute the following land use goals and policies from the County General Plan related to avoiding environmental effects:

Goal LU-5 Climate Change and Land Use. A land use plan and associated development techniques and patterns that reduce emissions of local greenhouse gases in accordance with state initiatives, while promoting public health.

LU-5.2 Sustainable Planning and Design. Incorporate into new development sustainable planning and design.

Goal LU-6 Development – Environmental Balance. A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.

LU-6.1 Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.

LU-6.5 Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.

LU-6.10 Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.

The Project would comply with policy LU-5.2 because a battery storage facility is inherently sustainable planning, as it expands the use of renewable energy resources. Policy LU-6.1 would be adhered to through the Project being designed to avoid impacts to sensitive natural resources. To comply with policy LU-6.5, the Project would implement mainly gravel infill and include several stormwater infiltration basins. Finally, the Project would be designed to protect property and residents from hazards as discussed in response 9(a), which aligns with policy LU-6.10. Therefore, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, and regulations as less than significant. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Land Use and Planning, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|---|----------------------------------|--|-----------------------------------|
| 12. Mineral Resources – Would the Project: | | | |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The Project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of “Inconclusive” (MRZ-4). MRZ-4 indicates there are no known mineral resource deposits in close proximity and defines areas where information is inadequate to assign another category. A map in the Mineral Resources section of the GPU EIR shows a mineral deposit north of the Project site, within what is currently Cole Grade Park, which was recorded in 1994 as a reclaimed stone quarry owned by the County. In addition, the Project site is surrounded by residential, agricultural, commercial and industrial uses which are mostly all incompatible to future extraction of mineral resources on the Project site. Therefore, implementation of the Project would not result in the loss of availability of a known mineral resource.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). The Project site is not located in an area that has MRZ-2 designated lands, nor is it located within 1,300 feet of such lands. Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recover (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of the Project.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Mineral Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant. Therefore, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|---|----------------------------------|--|-----------------------------------|
| 13. Noise – Would the Project: | | | |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) 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, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

The following study has been prepared for the Project in relation to noise and incorporated into the below discussion:

- Noise Impact Analysis prepared by Vista Environmental, dated May 20, 2020.

Discussion

- 13(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the project site consists of residences, commercial uses, industrial uses, agricultural uses, and vacant land. The project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan

The General Plan Noise Element Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dBA are required to incorporate design measures or mitigation as necessary to comply with the Noise Element.

A Noise Impact Analysis was prepared which analyzed all noise impacts from the proposed Project. The following equipment was identified as projecting noise during Project operations: 1) 232 Cube Pro Battery modules where the primary source of noise would be from the air conditioning units mounted on the modules; 2) 58 inverter-transformers where the primary source of noise would be from the inverters; 3) two Power Distribution Centers (PDCs) where the primary source of noise would be from the air conditioning; and BSU Transformer where the primary source of noise would be from the auxiliary transformer. The Project has a potential significant noise impact to surrounding properties exceeding 60 dBA CNEL. The Noise Impact analysis identified the closest existing sensitive receptor as a single-family residence located adjacent to the western property line of the Project site. However, based on the Noise Impact Analysis, the noise level from the Project would be sufficiently attenuated to conform to the noise standards with the incorporation of a solid 8-foot vinyl fence or similar fence surrounding all of the Project components except for the stormwater basin, as shown in the Noise Impact Report. The fence would have no gaps and have a sound transmission class rating of at least 18. The fence has been incorporated within the Project design as a design feature.

Project Design Feature

The following list includes the Project's design feature and condition of approval:

Vinyl Fence or Similar Fence

- The Project site equipment and facilities (with the exception of the stormwater drainage and retention basin) would be surrounded by a solid, 8-foot vinyl fence or similar fence, flush to the ground with no gaps, and have a Sound Transmission Class rating of 18 or greater.

With the incorporation of the above design feature, the Project would comply with the General Plan Noise Element.

Noise Ordinance

The Project would comply with the Noise Ordinance Section 36-404 for non-transportation noise generated by the project. The surrounding properties to the Project site are zoned Limited Impact Industrial (M52), RR, Limited Agricultural (A70), and M54 that have different required one-hour average sound limits depending on the zone. The A70 and RR zoned properties have a required one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The M52 and M54 zoned properties have a required one-hour average sound limit of 70 dBA for both the daytime and nighttime. Section 36.404(e) of the County Noise Ordinance states if a Project site is located on the boundary of two zones, the noise standard required is the arithmetic mean of the two zones. To be conservative, the nighttime one-hour average sound limit (45 dBA) was utilized for the calculation which resulted in a one-hour average sound limit between the

different zones of 57.5 dBA. Pursuant to the modeling and calculations within the Noise Impact Analysis, the Project would meet the 57.5 dBA and 70 dBA one-hour average sound limit required by the County Noise Ordinance with the Project design feature of a 8-foot vinyl fence, as previously discussed under General Plan. Therefore, the Project would not exceed applicable noise levels at the adjoining property lines.

The project would comply with the Noise Ordinance Section 36-408 through Section 36-410 for construction noise. The Project construction equipment anticipated for use include the following: excavator, backhoe, dozer, roller/compactor, dump truck, concrete mixer, flatbed-mounted utility crane, portable generator and welding equipment, forklift, pickup trucks, and utility line trucks. The project would not generate construction noise in excess of Noise Ordinance standards with the implementation of standard conditions. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75 dBA between the hours of 7 AM and 7 PM, Monday through Saturday. According to the Noise Impact Analysis, the maximum noise level limit of the Project during grading and construction would be 73 dBA. Therefore, through adherence of Sections 46.408 and 46.409 of the County Noise Ordinance, the Project would not expose surrounding use types to excessive noise and the Project would be in conformance with County requirements. These requirements were identified by the GPU EIR as Mitigation Measure Noi-4.2.

Project Conditions of Approval

The following list includes Project's Conditions of Approval:

Temporary Construction Noise

- The project shall comply with the following temporary construction noise control measures:
 - Turn of equipment when not in use.
 - Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured to prevent rattling and banging.
 - Use equipment with effective mufflers.
 - Minimize the use of back-up alarms.
 - Equipment staging areas should be placed at locations away from noise sensitive receivers.

With the incorporation of the above standard conditions, the Project would comply with the General Plan Noise Element.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. The proposed Project would also have a less than significant impact with the incorporation of Project conditions and adhering to local regulations identified by the GPU EIR as Mitigation Measures Noi-1.1, Noi-1.2, Noi-1.4 and Noi-4.2. Therefore, the proposed Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(b) The GPU EIR concluded this impact to be less than significant with mitigation. Although the Project site would be within 600 feet from a public road or transit right-of-way with projected noise contours of 65 dBA or more, the Project would not expose sensitive receptors to excessive groundborne vibration and groundborne noise levels because the Project site would be unmanned for the exception of bi-monthly maintenance visits. The Project would develop a battery energy storage system which is not considered a County sensitive receptor to low ambient vibration. In addition, the Project would not involve any major expansions of roadways

or any other activities that would expose existing or foreseeable noise sensitive land uses to vibration noise that would exceed the County noise standards.

As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than significant with mitigation. However, the Project would have a less than significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(c) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 12(a), the Project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards with the incorporation of Project conditions and a Project design feature for a solid 8-foot vinyl fence. Also, the Project would not expose existing or planned noise sensitive areas to noise 10 dBA CNEL over existing ambient noise levels. The Noise Impact Analysis included an evaluation of the direct and cumulative impacts for this project. Based on the report, the project has demonstrated to not have any direct or cumulative impacts on the existing surrounding area. The project would not create a direct impact of more than 3 dBA CNEL on any roadway segment and no cumulative noise increase of 3 dBA CNEL or more were found. Therefore, the Project would not cause significant impacts to any existing or future noise sensitive land uses.

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. However, the Project would have a less than significant impact with the incorporation Project conditions and Project design features listed in response 13(a). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the Project vicinity. Also, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance with the implementation of standard conditions discussed in response 13(a), which require adherence of Sections 46.408 and 46.09 of the Noise Ordinance. These requirements were identified by the GPU EIR Mitigation Measure Noi-4.2. Based on this, construction operations would occur only during permitted hours of operation and would not result in a sound level limit in excess of 75 dBA for more than 8 hours during a 24-hour period.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. However, the proposed Project would have a less than significant impact with Project conditions of approval listed in response 13(a). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 13(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within a one-mile vicinity of a private airstrip. Therefore, the proposed Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Noise, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Noi-1.1, Noi-1.2, Noi-1.4 and Noi-4.2) have been incorporated into the Project as design features or conditions of approval. The mitigation measures, as detailed above, requires the Project applicant to comply with the Noise Compatibility Guidelines in County Noise Element, the Guidelines for Determining Significance for Noise, and the County Noise Ordinance.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|---|----------------------------------|--|-----------------------------------|
| 14. Population and Housing – Would the Project: | | | |
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 14(a) The GPU EIR concluded this impact to be less than significant. The Project is a battery energy storage facility, and therefore does not involve development of residential units. This physical change would not induce substantial population growth in the area because there would be no extension of new major infrastructure such as public roadways or other infrastructure into previously unserved areas, and no regulatory changes are proposed that would allow increased population growth. Therefore, impacts would be less than significant and consistent with the GPU EIR.

As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 14(b) The GPU EIR concluded this impact to be less than significant. The Project would not displace any housing or structures because the Project site is currently undeveloped, vacant land. No impact would occur.

As previously discussed, the GPU EIR determined impacts from displacement of housing to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 14(c) The GPU EIR concluded this impact to be less than significant. As indicated in response 14(b), the Project would not displace any residential structures and would therefore not require the displacement any people.

As previously discussed, the GPU EIR determined impacts from displacement of people to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Population and Housing, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|----------------------------------|--|-----------------------------------|
| 15. Public Services – Would the Project: | | | |
| a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. The Project does not involve the construction of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. Additionally, as discussed above in response 14(a), the Project would not induce population growth or public use of the site in any way. The Project will be un-manned during operations. Crews of two to four person's will periodically visit the site (bi-monthly) for routine inspection and maintenance of the facilities and site. In addition, the FPP indicates that the VCFPD has adequate service availability for the Project. The approximate 9 acre-ft of water required during the duration of construction is expected to be provided by VCMWD through a temporary use permit. Additionally, minimal water would be required for the Project's operational needs. Therefore, Project water requirements would be within the service capacity of the VCMWD. Therefore, the Project would not result in the need for significantly altered services or facilities.

As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services remained significant and unavoidable. However, as the Project would have a less than significant impact for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Public Services, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|----------------------------------|--|-----------------------------------|
| 16. Recreation – Would the Project: | | | |
| a) Would the project 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose any residential use, included but not limited to a residential subdivision, mobile home park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. No impact to parks or recreation facilities would occur as a result of the Project.

As previously discussed, the GPU EIR determined impacts related to deterioration of parks and recreational facilities to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not include recreational facilities or require the construction or expansion of recreational facilities such as parks.

As previously discussed, the GPU EIR determined impacts related to construction of new recreational facilities to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Recreation, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|----------------------------------|--|-----------------------------------|
| 17. Transportation and Traffic – Would the Project: | | | |
| a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego Guidelines for Determining Significance for Traffic and Transportation establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards, Mobility Element, Transportation Impact Fee Program and the Congestion Management Program.

The Project would not have a direct impact related to a conflict with any performance measures which have establishes measures of effectiveness of the circulation system. This is because the Project trips would not exceed any of the County's Guidelines for Determining Significance for direct impacts related to Traffic and Transportation. Project trips, or average daily trips (ADTs), associated with Project construction is estimated to include between 5 and 13 ADT for workers depending on the construction phase. In addition, approximately 137 ADT for haul trips is estimated during the Project site grading and construction of the access road. This would be a temporary increase occurring only during Project construction. Given that construction worker

trips would be temporary and would be dispersed along different routes based on the origin of the trips, construction worker commuting is not expected to have a significant effect on the capacity of the transportation system in the area. Once operational, the Project would be unmanned (operated, monitored and dispatched remotely on a day-to-day basis). Project maintenance site visits would occur only twice monthly, on average, and are estimated to include crews of two to four persons, resulting in approximately 48 trips annually. Project trips would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions.

In addition, the County of San Diego has developed an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. The TIF program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. The Project would be required to pay into the TIF program. In addition, the minimal ADT for this Project was included in the growth projections upon which the TIF program is based.

Project Mitigation

Payment into the TIF Program

- The applicant would be required to pay into the County TIF program prior to building permit issuance.

The incorporation of the above condition would ensure the Project would not result in a cumulatively considerable impact to County Mobility Element Roadways.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. However, the Project would have a less than significant impact to County traffic with the incorporation of the Project condition of approval as indicated above. The condition was identified in the GPU EIR as Tra-1.7. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(b) The GPU EIR concluded this impact to be significant and unavoidable. The designated congestion management agency for the County is the San Diego Association of governments (SANDAG). In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process. Therefore, the project would not conflict with an applicable congestion management program and would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

The Office of Planning and Research and the California Natural Resources Agency has adopted new CEQA Guidelines that will go into effect July 1, 2020, requiring all lead agencies to analyze a Project's transportation impacts using vehicle miles traveled (VMT). VMT measures the per capita number of car trips generated by a Project and the distance that cars will travel to and from a Project. Although VMT is not in effect until July 1, 2020, the Project was determined to not have a significant impact in relation to VMT. As mentioned in other areas of this analysis, the Project maintenance trips would only occur bi-monthly, on average. Therefore, the Project would not generate sufficient traffic to result in a significant impact regarding VMT.

17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is not located within an Airport Influence Area, Airport Safety Zone, Airport Land Use Compatibility Plan Area, Avigation Easement, or Overflight Area. Therefore, the Project would have a less than significant impact to air traffic patterns. The Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The Project would not substantially increase driving hazards as the onsite private road easement would only be used by maintenance staff and for emergency responders in the event of an emergency.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. However, the Project would have a less-than-significant impact with no mitigation required for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not generate traffic volumes that would impede emergency access. In addition, the VCFPD has reviewed the Project and the Fire Protection Plan and have determined that there is adequate emergency fire access. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency fire apparatus accessibility. This includes a not less than 24-foot private road capable of accommodating a 75,000-pound standard fire truck.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the Project would have a less than significant impact for the reasons detailed above and is consistent with GPU EIR Mitigation Measure Tra-4.2, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in the construction of any public road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the Project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

As previously discussed, the GPU EIR determined impacts on alternative transportation and rural safety as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Transportation and Traffic, the following findings can be made

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Tra-1.7 and 4.2) would be applied to the Project. The mitigation measures, as detailed above, would require implementation of the County TIF Ordinance as well as Building and Fire Codes to ensure emergency fire apparatus accessibility.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|---|---|--|
| 18. Utilities and Service Systems – Would the Project: | | | |
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in a 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would be unmanned for the exception of bi-monthly routine maintenance visits. Daily operations would occur remotely and therefore would not require any sewer or septic systems. Because the Project would not construct any wastewater facilities, the Project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(b) The GPU EIR concluded this impact to be less than significant with mitigation.

Wastewater and Water Facilities

As discussed in response 18(a), no new wastewater facilities would be developed for the Project. Project construction and grading activities would require 9 acre-feet of water and would be provided by VCMWD through a temporary use agreement. Water required for operations would be either trucked in from offsite or provided by VCMWD through a limited use agreement. Since no habitable structures would be constructed as part of the Project, operational water required for the Project would be minimal, and only for ongoing site maintenance. The amount of water required for both the grading/construction phase and the operations phase would not require any expansion of existing water facilities.

Electric Power Facilities

The Project includes an approximately 0.3-mile 69kV gen-tie line constructed from the Project BSU north across Valley Center Road to SDG&E 69kV Valley Center Substation. The batteries will be charged from the CAISO grid via the Project's interconnection to the SDG&E Valley Center Substation. Energy stored in the Project will then be discharged back into the grid when the energy is needed, providing essential electricity reliability services to the local area. The construction of the 0.3-mile gen-tie line has been incorporated within the Project description and analyzed as part of this document. Therefore, this extension would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

Natural Gas

Because the Project site would be unmanned and no residences are proposed as part of this Project, no new or expanded natural gas facilities would be required.

Telecommunications Facilities

Because the Project site would be unmanned, and daily operations would be monitored remotely, the Project would not require the construction of new or expanded telecommunications facilities.

As previously discussed, the GPU EIR determined impacts on new water or wastewater treatment facilities, adequate water supplies and energy to be less than significant with mitigation. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(c) The GPU EIR concluded this impact to be less than significant with mitigation. As discussed in responses under 10. Hydrology and Water Quality, the Project would construct a stormwater basin onsite, located in an existing low point on the southwest corner of the Project site. The general location of the flow would be similar to existing conditions as all water would flow to the same downstream area. In addition, storm water management plans are prepared for both the construction and operation phases of the development Project as described further in response 10(a) and 10(b). The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. The Department of Public Works would ensure that these plans are implemented as proposed.

As previously discussed, the GPU EIR determined impacts on stormwater drainage facilities to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. As discussed in response 18(b), the Project would require minimal water usage during construction and operation. No additional entitlements or resources would be required.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be significant and unavoidable. However, the proposed Project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. As previously discussed, the Project would not require any wastewater services at the site. Therefore, the Project would not impact any wastewater treatment provider.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities be less than significant with mitigation. However, the proposed Project would have a less than significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(f) The GPU EIR concluded this impact to be less than significant. The Project would be unmanned and is expected to generate minimal solid waste. In addition, as a Project design feature, the Project would recycle, reduce and reuse construction materials. In addition, all solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, DEH is the Local Enforcement Agency which issues solid waste facility permits with concurrence from the Department of Resources Recycling and Recovery (CalRecycle) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are four, permitted active landfills in San Diego County with remaining capacity to adequately serve the Project. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(g) The GPU EIR concluded this impact to be less than significant. The Project would deposit all solid waste at a permitted solid waste facility. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Aesthetics, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

| | Significant Project Impact | Impact not identified by GPU EIR | Substantial New Information |
|--|----------------------------------|--|-----------------------------------|
| 19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project: | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did

address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

The following studies have been prepared for the proposed project:

- Wildland Fire Protection Plan (FPP) prepared by Santa Margarita Consulting, Inc., dated April 2020

Discussion

19(a) Project is listed as a high fire hazard severity zone in the California Department of Forestry and Fire Protection (CALFIRE)'s designated Local Responsibility Area (CALFIRE 2020). The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire code. The Project site would be serviced by the VCFPD. The closest fire station is located 0.7-miles from the Project site at 28234 Lilac Road. According to the FPP, the emergency travel response time would less than 2 minutes which would meet the required 5-minute travel time pursuant to the County General Plan's Safety Element. In addition, Project access has been designed in coordinating with the VCFPD and in conformance with State law and local regulations. The FPP describes how the Project complies with emergency access requirements, per the San Diego County Fire Code and Consolidated Fire Code, including turning radius and maneuverability of large emergency vehicles such as fire trucks and ambulances. All Project equipment will be setback at least 30 feet from property boundaries, fire access roads will be a minimum of 24' in width with appropriate turn-around capabilities, among other fire and safety systems and practices outlined in the FPP. Therefore, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the proposed Project would have a less than significant impact for the reasons detailed above and with the incorporation of the GPU EIR mitigation measures Haz-4.2 and Haz-4.3. The project would be consistent with the GPU EIR mitigation measure Haz-4.3 for compliance with the Building and Fire Code and the Project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a Project design feature. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

19(b) The GPU EIR concluded this impact to be significant and unavoidable. As indicated above in response a), the proposed project is located within a high fire hazard severity zone (FHSZ). However, the majority of the County is in the High and Very High FHSZ. Accordingly, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. The proposed project has prepared FPP which has been approved by the VCFPD. The proposed Project would not exacerbate wildfire risk due to slope, prevailing winds or other factors because the project site would not develop any steep slopes, can be described as gently sloping (10% gradient), does not contain any significant geological features that would influence wildland fire behavior, and is surrounded by development (less unmanaged vegetation).

The Project site does not contain any steep slopes and contour lines of the area surrounding the Project site indicate the area is generally sloping downward toward the south with elevations at or around approximately 1,370 feet above mean sea level. The Project site is located inland near Valley Center and the weather is consistent with Inland San Diego County with highs typically reaching mid 90's in the summer, mild winters with occasional frost, frequent westerly breezes, and possible events of Santa Ana winds. However, the Project would be unmanned and therefore would not exacerbate wildfire risks and expose Project occupants to pollutant

concentration from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the proposed Project would have a less than significant impact for the reasons detailed above and with the incorporation of the GPU EIR mitigation measures Haz-4.2 and Haz-4.3. The project would be consistent with the GPU EIR mitigation measure Haz-4.3 for compliance with the Building and Fire Code and the Project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a Project design feature. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. the Project would be unmanned and would require minimal maintenance. The Project site is currently vacant and has a mixture of non-native vegetation and weeds. The area to the north of the site contains a large amount of dead and downed vegetation, along with flammable weeds and rocky terrain. While wildland fire threat is minimal, if this vegetation is left as-is, it could represent a potential fire risk. As part of site preparation activities at the onset of Project construction, the Developer will remove dead/downed vegetation in areas within the Project parcel that lie outside the facility improvements in order to establish a fuel modification zone. Any vegetation removal would be done utilizing methodologies that ensure potential sensitive resources are not impacted. In addition, the gen-tie line connecting the Project to the SDG&E Valley Center substation would be underground, reducing the risk of exacerbation to wildfire. Based on compliance with the County Fire Code and Consolidated Fire Code, and compliance with the VCFPD's standard conditions, impacts associated with fire risk would be less than significant.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the proposed Project would have a less than significant impact for the reasons detailed above and with the incorporation of the GPU EIR mitigation measures Haz-4.2 and Haz-4.3. The project would be consistent with the GPU EIR mitigation measure Haz-4.3 for compliance with the Building and Fire Code and the Project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a Project design feature. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As stated in response 10(f), the Drainage Study concluded the Project would not alter existing drainage patterns onsite in a manner which would result in flooding on or offsite. The Project would be designed with a bioretention basin to capture the peak runoff rates. The basin would be adequately sized to attenuate post-project peak flow rates in the event a 100-year storm event would occur. As discussed in response 10(e) and 10(f), a mapped FEMA and County floodplain exists in the eastern portion of the site. However, the Project would not place housing within a floodway, floodplain, or 100-year flood area as no housing is proposed. In addition, the Project would be conditioned to obtain a CLOMR and LOMR as Project conditions of approval pursuant to FEMA to ensure no impacts would occur. Prior to construction, a geotechnical report would also be required with proposed foundation recommendation before the issuance of a building permit per California Building Code Sections 1803 and 1804. The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, the Project site elevations are relatively flat, ranging from 1376 feet above mean sea level (msl) in the northern portion of the site to 1364 feet above msl in the southwestern portion of the site. Moreover, the Project would comply with regulations relating to

emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire code. Therefore, the Project would not expose people or structures to a significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the proposed Project would have a less than significant impact for the reasons detailed above and with the incorporation of the GPU EIR mitigation measures Haz-4.2 and Haz-4.3. The project would be consistent with the GPU EIR mitigation measure Haz-4.3 for compliance with the Building and Fire Code and the Project has incorporated the GPU EIR Mitigation Measure Haz-4.2 for brush management as a Project design feature. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

The GPU EIR concluded significant and unavoidable impacts associated with wildfire under Section 2.7, Hazards and Hazardous Materials. Based on the Project fire behavior modeling and further analysis provided within the FPPs, with the incorporation of Project design features, impacts associated with wildfire would be less than significant. Therefore, the proposed Project would not exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

With regards to the issue area of Wildfire, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Haz-4.2 and Haz-4.3) would be applied to the Project. These mitigation measures, as detailed above, requires the Project applicant to implement brush management and comply with the building and fire codes.

Appendices

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report,
County of San Diego General Plan Update, SCH # 2002111067

Appendix A

The following is the list of Project specific technical studies used to support the Project's environmental analysis. All technical studies are available on the website here

https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects.html#par_title

or hard copies are available at the County of San Diego Zoning Counter, 5510 Overland Avenue, Suite 110, San Diego, 92123:

Alberts, Kris; Blackhawk Environmental, Inc., (June 2020), Biological Resources Letter Report

Berceli-Boyle, Tina; Haley & Aldrich, Inc, (June 2020), Draft Hazard Consequences Analysis

Carda, Chris; Westwood Professional Services, (June 3, 2020), Preliminary Drainage Study

Carda, Chris; Westwood Professional Services, (June 22, 2019), Priority Development Project (PDP) SWQMP

Clayton, Heather; Chambers Group, Inc., (June 24, 2020), Conceptual Revegetation Plan

Loudin, Jeremy; Ldn Consulting, Inc., (June 17, 2020), Air Quality Analysis

Loudin, Jeremy; Ldn Consulting, Inc., (June 22, 2020), Greenhouse Gas Screening Letter

Lucera, Richard; Kimley Horn, (April 21, 2020), Floodplain Analysis for Unnamed Tributary to Keys Canyon Creek

Morel, Sid; Santa Margarita Consulting, LLC., (April 2020), Wildland Fire Protection Plan

Pentney, Sandra; Chambers Group, (June 2020), Cultural Resources Phase I Survey and Phase II Evaluation for the Valley Center Storage Project; 29523 Valley Center Road, San Diego County, California

Power Engineers, (April 2020), Visual Sims and Character Photographs

Tonkovich, Greg; Vista Environmental, (May 20, 2020), Noise Impact Analysis

References

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf

Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:

http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf

REVIEW FOR APPLICABILITY OF/COMPLIANCE WITH ORDINANCES/POLICIES

FOR PURPOSES OF CONSIDERATION OF
VALLEY CENTER ENERGY STORAGE
PDS2020-STP-20-011, PDSXXXX-HLP-XXX
PDS2020-ER-20-08-005

June 25, 2020

I. HABITAT LOSS PERMIT ORDINANCE – Does the proposed project conform to the Habitat Loss Permit/Coastal Sage Scrub Ordinance findings?

YES
☒

NO
☐

NOT APPLICABLE/EXEMPT
☐

Discussion:

While the proposed project and off-site improvements are located outside of the boundaries of the Multiple Species Conservation Program and the project site and locations of any off-site improvements contain habitats subject to the Habitat Loss Permit/Coastal Sage Scrub Ordinance (HLPO), the project complies with the HLPO as demonstrated in the Draft Habitat Loss Permit dated June 22, 2020. A final Habitat Loss Permit will be required as a condition of approval (Section 86.102).

II. MSCP/BMO - Does the proposed project conform to the Multiple Species Conservation Program and Biological Mitigation Ordinance?

YES
☐

NO
☐

NOT APPLICABLE/EXEMPT
☒

Discussion:

The proposed project and any off-site improvements related to the proposed project are located outside of the boundaries of the Multiple Species Conservation Program. Therefore, conformance with the Multiple Species Conservation Program and the Biological Mitigation Ordinance is not required.

III. GROUNDWATER ORDINANCE - Does the project comply with the requirements of the San Diego County Groundwater Ordinance?YES
☐NO
☐NOT APPLICABLE/EXEMPT
☒

Discussion:

The project would be unmanned and operated from a remote location. Therefore, no water would be used for the exception of maintenance visits bi-monthly. For this water use, the project would obtain its water supply from the Valley Center Municipal Water District which obtains water from surface reservoirs and/or imported sources. The project will not use any groundwater for any purpose, including irrigation or domestic supply.

IV. RESOURCE PROTECTION ORDINANCE - Does the project comply with:

The wetland and wetland buffer regulations (Sections 86.604(a) and (b)) of the Resource Protection Ordinance?

YES
☒NO
☐NOT APPLICABLE/EXEMPT
☐

The Floodways and Floodplain Fringe section (Sections 86.604(c) and (d)) of the Resource Protection Ordinance?

YES
☒NO
☐NOT APPLICABLE/EXEMPT
☐

The [Steep Slope](#) section (Section 86.604(e))?

YES
☒NO
☐NOT APPLICABLE/EXEMPT
☐

The Sensitive Habitat Lands section (Section 86.604(f)) of the Resource Protection Ordinance?

YES
☒NO
☐NOT APPLICABLE/EXEMPT
☐

The Significant Prehistoric and Historic Sites section (Section 86.604(g)) of the Resource Protection Ordinance?

YES
☒NO
☐NOT APPLICABLE/EXEMPT
☐

Discussion:

Wetland and Wetland Buffers:

The site contains no wetland habitats as defined by the San Diego County Resource Protection Ordinance. The site does not have a substratum of predominately undrained hydric soils, the land does not support, even periodically, hydric plants, nor does the site have a substratum that is non-soil and is saturated with water or covered by water at some time during the growing season of each year. Therefore, it has been found that the proposed project complies with Sections 86.604(a) and (b) of the Resource Protection Ordinance.

Floodways and Floodplain Fringe:

Even though wetlands and/or wetland buffer areas have been identified on the subject property, the project has been found to be consistent with Article IV of the Resource Protection Ordinance, due to the following reasons: a) the project would not result in the placement of any non-permitted uses within wetlands; b) the project would not result in grading, filling, construction, or placement of structures within identified wetlands because the project would be required to obtain a Conditional Letter of Map Revision and a Letter of Map Revision from the Federal Emergency Management Agency to remap the floodplain to current site conditions; and c) the project would not result in any non-permitted uses within wetland buffer areas. Therefore, it has been found that the proposed project complies with Sections 86.604(c) and (d) of the Resource Protection Ordinance.

Steep Slopes:

The average slope for the property is less than 25 percent. Slopes with a gradient of 25 percent or greater and 50 feet or higher in vertical height are required to be placed in open space easements by the San Diego County Resource Protection Ordinance (RPO). There are no steep slopes on the property. Therefore, it has been found that the proposed project complies with Sections 86.604(e) of the RPO.

Sensitive Habitats:

Sensitive habitat lands include unique vegetation communities and/or habitat that is either necessary to support a viable population of sensitive species, is critical to the proper functioning of a balanced natural ecosystem, or which serves as a functioning wildlife corridor. No sensitive habitat lands were identified on the site. Therefore, it has been found that the proposed project complies with Section 86.604(f) of the RPO.

Significant Prehistoric and Historic Sites:

The property has been surveyed by a County of San Diego approved archaeologist and it has been determined that there are archaeological sites present. One archaeological site (P-37-000759) was determined not to be significant after testing and evaluation, and therefore does not warrant preservation under the Resource Protection Ordinance. Testing and other investigation determined that six other archaeological sites on the Project site (P-37-015414, P-37-017525, P-37-017526, P-37-017527, P-37-030999, and P-37-031002) meet the definition of a significant site set forth in the Resource Protection Ordinance. The project complies with the Resource Protection Ordinance because these six sites will be avoided. Therefore, it has been found that the proposed project complies with Section 86.604(g) of the RPO.

V. STORMWATER ORDINANCE (WPO) - Does the project comply with the County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance (WPO)?

YES

☒

NO

☐

NOT APPLICABLE

☐

Discussion:

A Priority Development Project Stormwater Quality Management Plan (PDP SWQMP) was prepared for the project by Lundstrom Engineering and Surveying, Inc. dated May 21, 2020. The PDP SWQMP has been reviewed and found to be complete and in compliance with the WPO.

VI. NOISE ORDINANCE – Does the project comply with the County of San Diego Noise Element of the General Plan and the County of San Diego Noise Ordinance?

YES

☒

NO

☐

NOT APPLICABLE

☐

Discussion:

Even though the proposal could generate potentially significant noise levels (i.e., in excess of the County General Plan or Noise Ordinance), the following noise mitigation measures are proposed to reduce the noise impacts to applicable limits:

Staff has reviewed the project plans and Noise Report prepared by Vista Environmental dated May 20, 2020. Documentation is considered acceptable and staff has noise recommendations to the project. The project is for a Site Plan to construct a battery energy storage system facility and is subject to the County Noise Ordinance and Noise Elements. The site is located near Valley Center Road, but no residences are proposed as part of this project and thus would not be impacted by the noise levels from this roadway. The project site would be unmanned for the exception of bi-monthly maintenance visits. The project would not contribute to significant traffic noise generation, therefore, would not expose existing or future noise sensitive land uses to noise levels that would exceed the County's noise standards. The site is zoned General Impact Industrial (M54) and is subject to the Noise Element which requires an exterior noise level to not exceed the threshold of 70 dBA CNEL onsite. Based on the noise report, with the construction of the solid 8-foot vinyl fence or similar fence proposed around the main project components, the exterior noise levels would be reduced and would conform with the Noise Elements. In addition, as mentioned above, the site would be unmanned. Based on the information above, the project complies with the County Noise Elements.

Furthermore, the project is subject to the County Noise Ordinance, which prohibits noise levels generated by this project to exceed the noise threshold pursuant to Section 36.404. The project site is zone M54 which is subject to the noise threshold of 70 dBA. The adjacent site to the north, west, and east are zoned Limited Industrial (M52), which

is subject to the noise threshold of 70 dBA CNEL. The adjacent parcel to the south is zoned Rural Residential (RR), which is subject to the stringent arithmetic mean level of 57.5 dBA. The project would be designed to incorporate a solid 8-foot vinyl fence or similar fence, which would ensure that the noise levels from this project would not exceed the County's Noise Standards. Therefore, the Project would comply with the County Noise Ordinance.

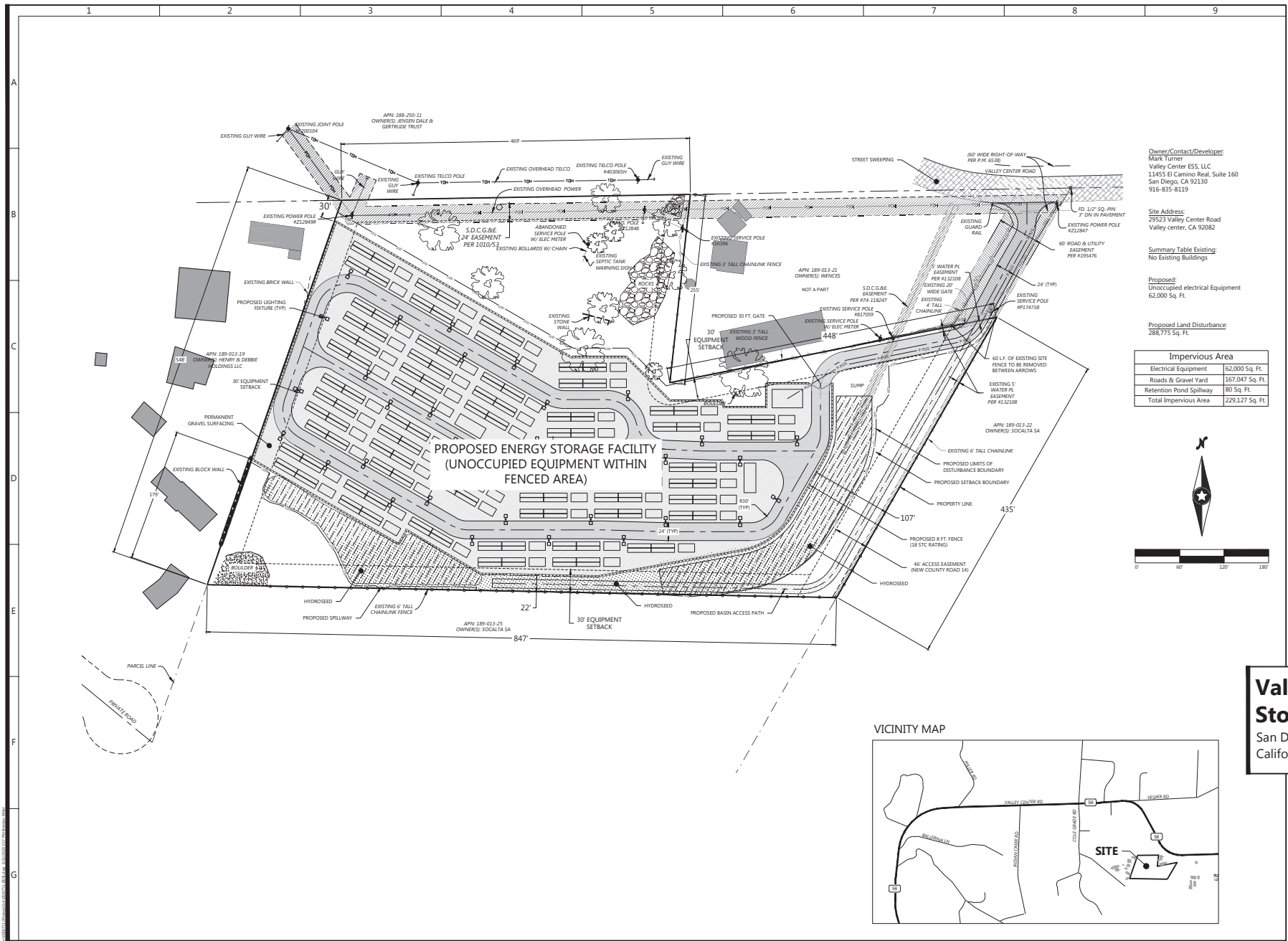
Temporary construction noise is subject to Section 36.408, 409, and 410. The noise generated by construction equipment includes haul trucks, grader, dozers, etc. The project would not involve drilling or blasting equipment. Construction equipment is not anticipated to operate in any one location for an extended period. Additionally, noise reducing measures would be implemented as part of the grading process such as controlling the hours of construction to normal weekday working hours. Given the spatial separation of the equipment over the site and the limited hours of operations, the noise levels from the grading are anticipated to comply with the County of San Diego's 75 dBA standard per Section 36.409 of the Noise Ordinance at all Project property lines.

ENVIRONMENTAL FINDINGS

VALLEY CENTER ENERGY STORAGE
PDS2020-STP-20-011, PDS2020-ER-20-08-005
August 27, 2020

1. In accordance with State CEQA Guidelines section 15183, find the project is exempt from further environmental review for the reasons stated in the 15183 Statement of Reasons dated August 27, 2020 because the project is consistent with the General Plan for which an environmental impact report dated August 2011 on file with Planning & Development Services as Environmental Review Number 02-ZA-001 (GPU EIR) was certified, there are no project specific effects which are peculiar to the project or its site, there are no project impacts which the GPU EIR failed to analyze as significant effects, there are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate, there is no substantial new information which results in more severe impacts than anticipated by the GPU EIR, and that the application of uniformly applied development standards and policies, in addition to feasible mitigation measures included as project conditions would substantially mitigate the effects of the project.
2. In accordance with State CEQA Guidelines section 15183(e)2, the Zoning Administrator, at a duly noticed public hearing on August 27, 2020, found that feasible mitigation measures identified in the General Plan Update EIR will be undertaken.
3. Find that the proposed project is consistent with the Resource Protection Ordinance (County Code, section 86.601 et seq.).
4. Find that plans and documentation have been prepared for the proposed project that demonstrate that the project complies with the Watershed Protection, Stormwater Management, and Discharge Control Ordinance (County Code, section 67.801 et seq.).

Attachment C – Site Plan and Preliminary Grading Plan



PREPARED FOR:

Owner/Contact/Developer:
Mark Turner
Valley Center ESS, LLC
11455 El Camino Real, Suite 160
San Diego, CA 92130
916-835-8119

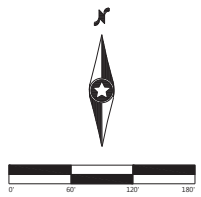
Site Address:
29523 Valley Center Road
Valley Center, CA 92082

Summary Table Existing:
No Existing Buildings

Proposed:
Unoccupied electrical equipment
62,000 Sq. Ft.

Proposed Land Disturbance:
288,775 Sq. Ft.

| Impervious Area | |
|-------------------------|-----------------|
| Electrical Equipment | 62,000 Sq. Ft. |
| Roads & Gravel Yard | 167,047 Sq. Ft. |
| Retention Pond Spillway | 80 Sq. Ft. |
| Total Impervious Area | 229,127 Sq. Ft. |



Valley Center Storage Project

San Diego County, California

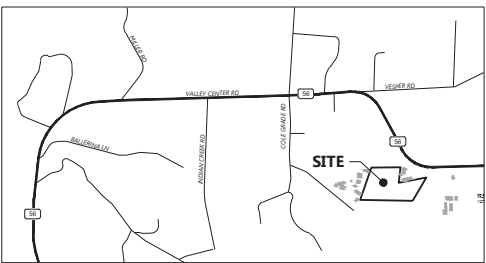
Plot Plan

Not For Construction

DATE: 06/08/2020

SHEET: 1

VICINITY MAP

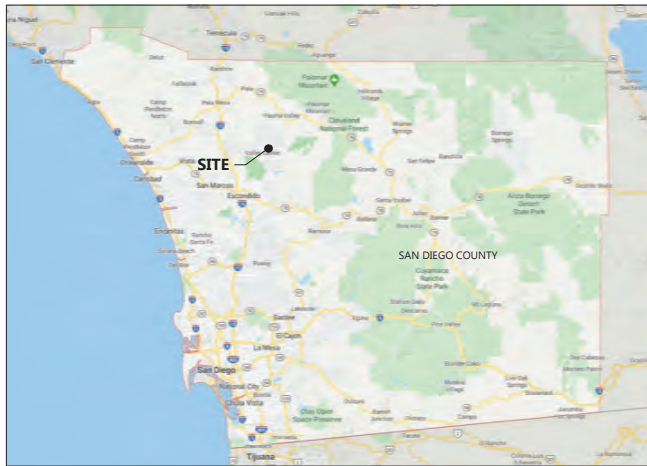


Valley Center Storage Project

San Diego County, California

Site Plan & Civil Grading Plans

REGIONAL MAP



SOURCE: MAP DATA ©2020 GOOGLE (NOT TO SCALE)

VICINITY MAP



SOURCE: MAP DATA ©2020 GOOGLE (NOT TO SCALE)

| Sheet List Table | |
|------------------|--------------------------|
| Sheet Number | Sheet Title |
| 1 | Cover |
| 2 | Conditions & Constraints |
| 3 | Site Plan |
| 4 | Grading Plan |
| 5 | Erosion Control Plan |
| 6 | Details |
| 7 | Details |
| 8 | Notes |

Westwood

Phone (952) 937-5150 12701 Whitewater Drive, Suite #300
 Fax (952) 937-5822 Minneapolis, MN 55343
 Toll-Free (888) 937-5150 westwoodpro.com
 Westwood Professional Services, Inc.



PREPARED FOR:

Valley Center ESS, LLC
 11455 El Camino Real Suite 160
 San Diego, CA 92130

| REVISIONS: | | |
|------------|----------|--|
| # | DATE | COMMENT |
| A | 04/24/20 | Issued for Drainage Review |
| B | 04/29/20 | For SWQMP Submittal |
| C | 06/08/20 | Issued to Address County Review Comments |

**Valley Center
Storage Project**
 San Diego County,
 California

Cover

Not For Construction

DATE: 06/08/2020

SHEET: 1

1 - 104



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Fax (952) 937-5822 Minneapolis, MN 55343
Toll Free (888) 937-5151 westwoodpro.com
Westwood Professional Services, Inc.



PREPARED FOR:

Valley Center ESS, LLC
11455 El Camino Real Suite 160
San Diego, CA 92130

| REVISIONS. | | |
|------------|----------|--|
| # | DATE | COMMENT |
| A | 06/08/20 | Issued for Drainage Review |
| B | 04/30/20 | For SWQMP Submittal |
| C | 06/08/20 | Issued to Address County Review Comments |
| | | |
| | | |
| | | |
| | | |

- LEGEND:**
- PROJECT BOUNDARY
 - SECTION LINES
 - RIGHT-OF-WAY LINES
 - PARCEL LINES
 - EASEMENT LINES
 - EX. INDEX CONTOUR
 - EX. INTERVAL CONTOUR
 - EX. TREELINE
 - EX. PAVED ROAD
 - EX. GRAVEL ROAD
 - EX. FENCE
 - EX. CULVERT
 - EX. DITCH TOP/TOW
 - EX. FIBER OPTIC LINE
 - EX. GAS PIPELINE
 - EX. UNDERGROUND POWER
 - EX. OVERHEAD POWER
 - EX. TELEPHONE LINE
 - 24 FT. PROPOSED ACCESS ROAD
 - PROPOSED SECURITY FENCE
 - PROPOSED OVERHEAD POWER LINE
 - PROPOSED BATTERY CONTAINER & INVERTER
 - PROPOSED BATTERY STEP-UP TRANSFORMER
 - POWER DISTRIBUTION CENTER
 - PROPOSED LAYDOWN YARD
 - UNDERGROUND COLLECTION
 - PROPOSED INDEX CONTOUR
 - PROPOSED INTERVAL CONTOUR
 - PROPOSED GRADING LIMITS
 - PROPOSED DISTURBANCE LIMITS
 - PROPOSED PERMEABLE VINYL BFT WALL/FENCE (MIN. 18 STC RATING) TOP OF FENCE ELEVATION = PROPOSED GRADE +8'
 - PROPOSED SETBACK BOUNDARY
 - EXISTING BUILDING
 - Digitized County of SD Effective Floodplain
 - Digitized County of SD Effective Floodway
 - 100 Year Corrected Effective (Pre Project) - PG - PG
 - 100 Year Post Project - PG - PG
 - 100 Year Corrected Floodway - PG - PG
 - 100 Year Duplicative County SD HEC 2 - PG - PG

NOTE:
THIS PLAN IS PROVIDED TO ALLOW FOR FULL AND ADEQUATE DISCRETIONARY REVIEW OF A PROPOSED DEVELOPMENT PROJECT.
THE PROPERTY OWNER ACKNOWLEDGES THAT ACCEPTANCE OR APPROVAL OF THIS PLAN DOES NOT CONSTITUTE AN APPROVAL TO PERFORM ANY GRADING SHOWN HEREON, AND AGREES TO OBTAIN VALID GRADING PERMITS BEFORE COMMENCING SUCH ACTIVITY.
FEMA FLOOD INFORMATION BASED ON FIRM PANEL 06073C0810G DATED 05/16/2012

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Valley Center Storage Project
San Diego County, California

Conditions & Constraints

Not For Construction

DATE: 06/08/2020

SHEET: 2

| Proposed Road Grade Legend | | |
|----------------------------|---------------|-------------|
| Minimum Slope | Maximum Slope | Color |
| 2.00% | 4.00% | Light Green |
| 4.00% | 6.00% | Yellow |
| 6.00% | 8.00% | Orange |
| 8.00% | 10.00% | Dark Orange |

LEGEND:

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- PROPOSED DISTURBANCE LIMITS
- PROPOSED CULVERT
- PROPOSED PERMEABLE VINYL 8 FT. WALL/FENCE (MIN. 18 STC RATING)
- TOP OF FENCE ELEVATION +8'
- PROPOSED GRADE +8'
- PROPOSED LIGHTING
- PROPOSED SETBACK BOUNDARY
- EXISTING UTILITY EASEMENT
- ACCESS EASEMENT AREA

NOTE:

1. THE PROJECT WILL CONFORM TO ALL APPLICABLE COUNTY OF SAN DIEGO LIGHTING REQUIREMENTS.

Westwood

Phone (952) 937-5150 12701 Whitewater Drive, Suite #300
 Fax (952) 937-5822 Minneapolis, MN 55343
 Toll Free (888) 937-5151 westwoodps.com
 Westwood Professional Services, Inc.



PREPARED FOR:

Valley Center ESS, LLC
 11455 El Camino Real Suite 160
 San Diego, CA 92130

| REVISION: | # | DATE | COMMENT |
|-----------|----------|--|---------|
| A | 04/24/20 | Issued for Drainage Review | |
| B | 04/29/20 | For SWQMP Submittal | |
| C | 06/08/20 | Issued to Address County Review Comments | |

1 - 106



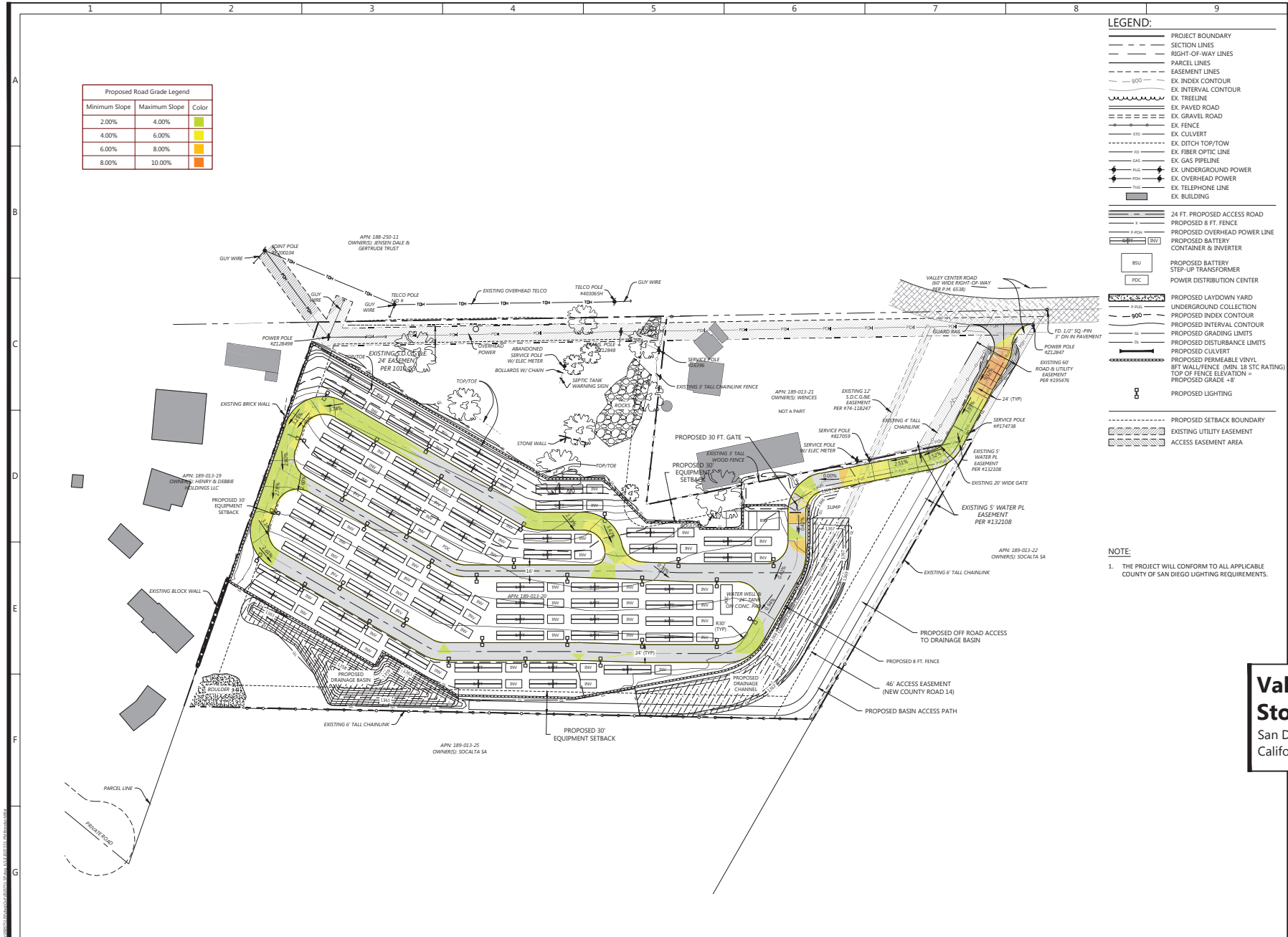
Valley Center Storage Project San Diego County, California

Site Plan

Not For Construction

DATE: 06/08/2020

SHEET: 3





PREPARED FOR:

Valley Center ESS, LLC
 11455 El Camino Real Suite 160
 San Diego, CA 92130

| REVISION | DATE | COMMENT |
|----------|----------|---|
| A | 04/24/20 | Issued for Drainage Review |
| B | 04/29/20 | For SWQMP Submittal |
| A | 06/08/20 | Added to Set per county Review Comments |

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LEGEND:

- PROJECT BOUNDARY
- SECTION LINES
- RIGHT-OF-WAY LINES
- PARCEL LINES
- EASEMENT LINES
- EX. INDEX CONTOUR
- EX. INTERVAL CONTOUR
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- TOP OF FENCE ELEVATION =
- PROPOSED GRADE + 8'
- PROPOSED LIGHTING

| GRADING QUANTITIES (Cu Yds.) | |
|------------------------------|---------|
| UNADJUSTED CUT | 4468.60 |
| UNADJUSTED FILL | 3510.20 |
| UNADJUSTED NET (EXCESS CUT) | 958.40 |

NOTE:

- THIS PLAN IS PROVIDED TO ALLOW FOR FULL AND ADEQUATE DISCRETIONARY REVIEW OF A PROPOSED DEVELOPMENT PROJECT. THE PROPERTY OWNER ACKNOWLEDGES THAT ACCEPTANCE OR APPROVAL OF THIS PLAN DOES NOT CONSTITUTE AN APPROVAL TO PERFORM ANY GRADING SHOWN HEREON, AND AGREES TO OBTAIN VALID GRADING PERMISSIONS BEFORE COMMENCING SUCH ACTIVITY.
- THE BOUNDARY AND BASIS OF BEARING AND BASIS OF ELEVATION USED IN THE DESIGN HEREIN IS BASED ON VALLEY CENTER BATTERY STORAGE ALTA/NGPS SURVEY, SAN DIEGO COUNTY, CALIFORNIA BY SMITHCO SURVEYING ENGINEERING DATED 11/05/2019.

Valley Center Storage Project

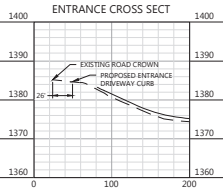
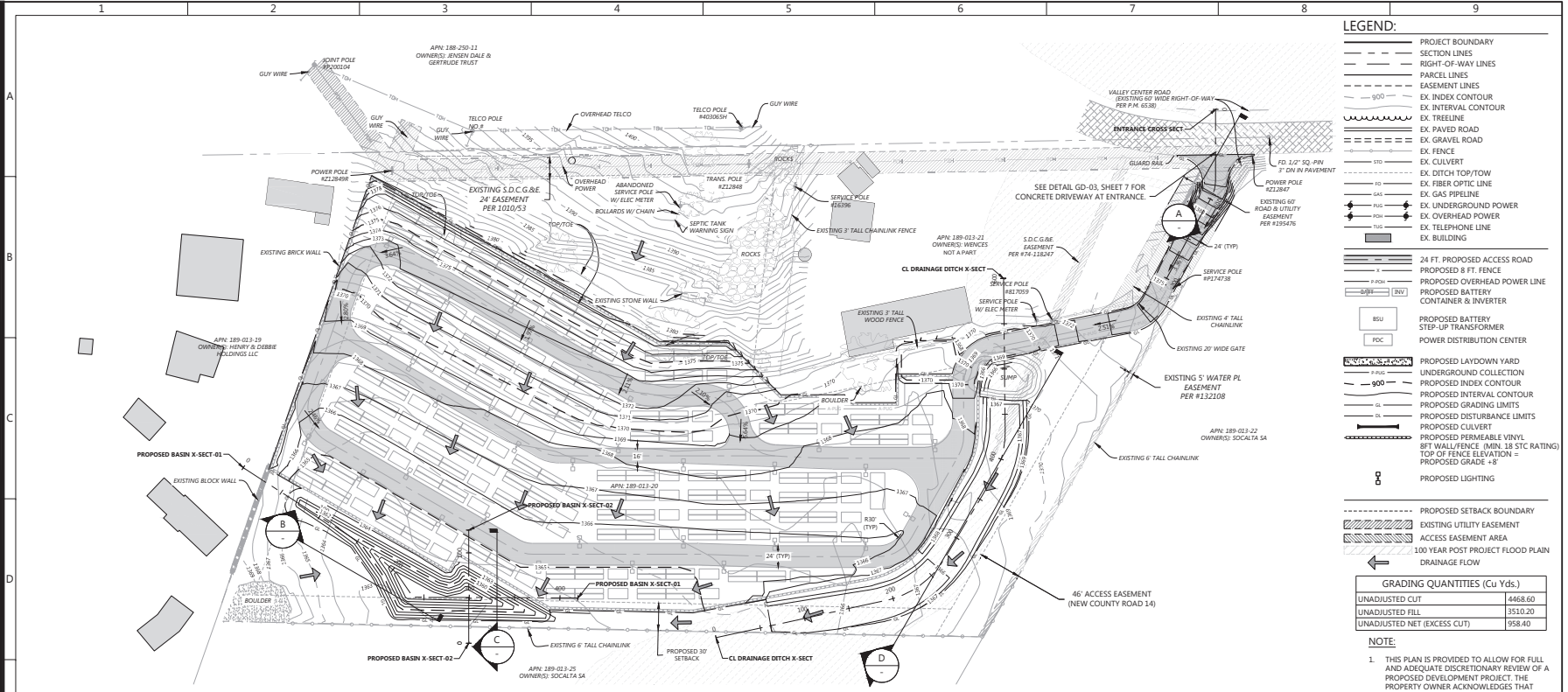
San Diego County, California

Grading Plan

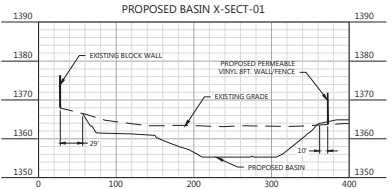
Not For Construction

DATE: 06/08/2020

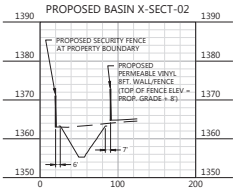
SHEET: 4



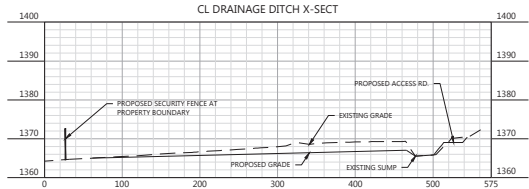
(A) Entrance Road Cross Section
 Not to Scale



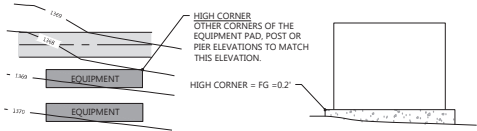
(B) Proposed Basin Cross Section
 Not to Scale



(C) Proposed Basin Cross Section
 Not to Scale

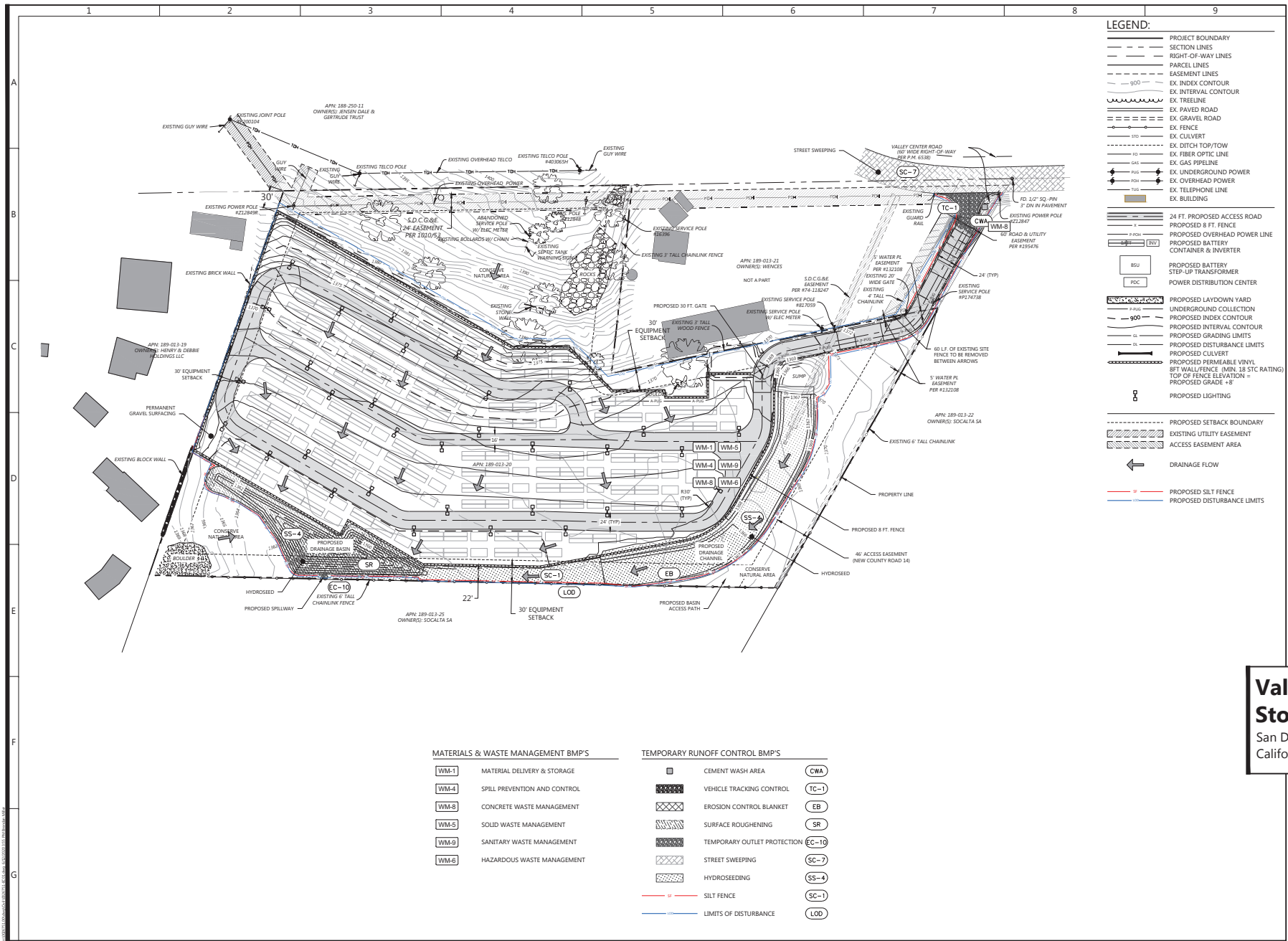


(D) Drainage Ditch Centerline Cross Section
 Not to Scale



(E) Proposed Equipment Grading
 Not to Scale

NOTE:
 LOCALIZED GRADING SHOWN IN THIS DETAIL MAY BE ADJUSTED BASED ON FINAL EQUIPMENT SELECTION.



LEGEND:

- PROJECT BOUNDARY
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- PROPOSED DISTURBANCE LIMITS
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- PROPOSED PERMEABLE VINYL 8 FT WALL FENCE (MIN. 18 STC RATING)
- TOP OF FENCE ELEVATION =
- PROPOSED GRADE +8'
- PROPOSED LIGHTING
- PROPOSED SETBACK BOUNDARY
- EXISTING UTILITY EASEMENT
- ACCESS EASEMENT AREA
- DRAINAGE FLOW
- PROPOSED SILT FENCE
- PROPOSED DISTURBANCE LIMITS

Westwood

Phone (952) 937-5150 12701 Whittaker Drive, Suite #300
 Fax (952) 937-5822 Minneapolis, MN 55443
 Toll Free (888) 937-5151 westwoodpro.com



PREPARED FOR:

Valley Center ESS, LLC
 11455 El Camino Real Suite 160
 San Diego, CA 92130

| REVISIONS: | DATE | COMMENT |
|------------|----------|--|
| A. | 04/24/20 | Issued for Drainage Review |
| B. | 04/29/20 | For SWQMP Submittal |
| C. | 06/08/20 | Issued to Address County Review Comments |

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Valley Center Storage Project

San Diego County, California

Erosion Control Plan

Not For Construction

DATE: 06/08/2020

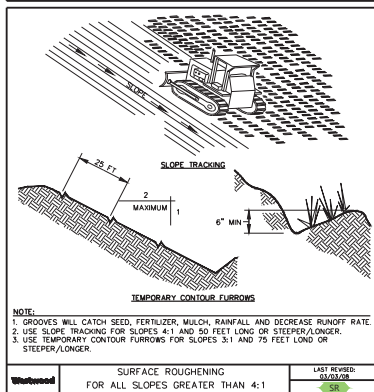
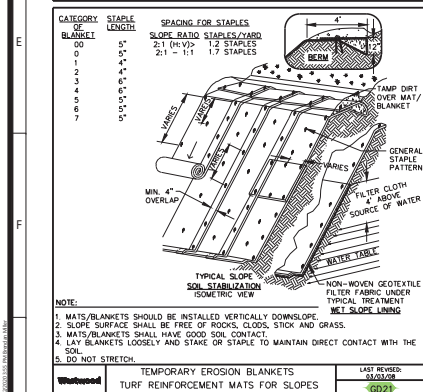
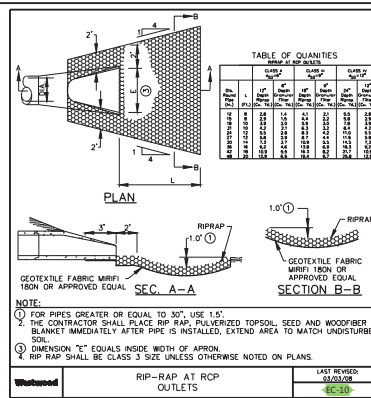
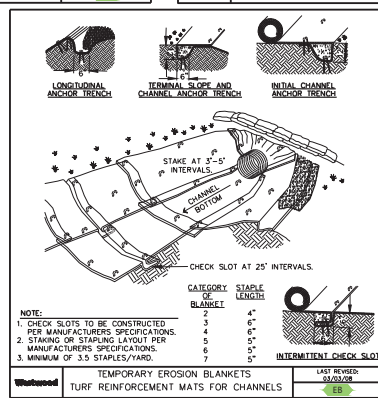
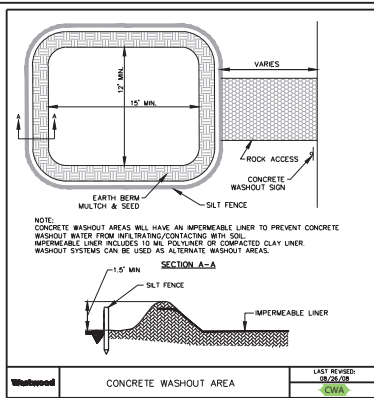
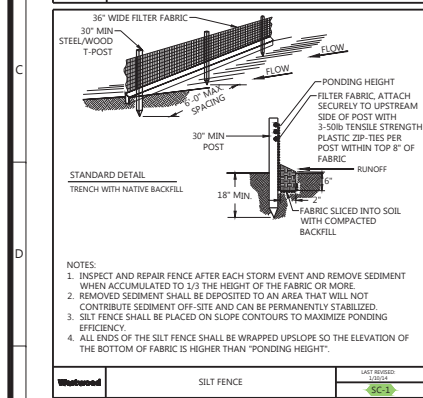
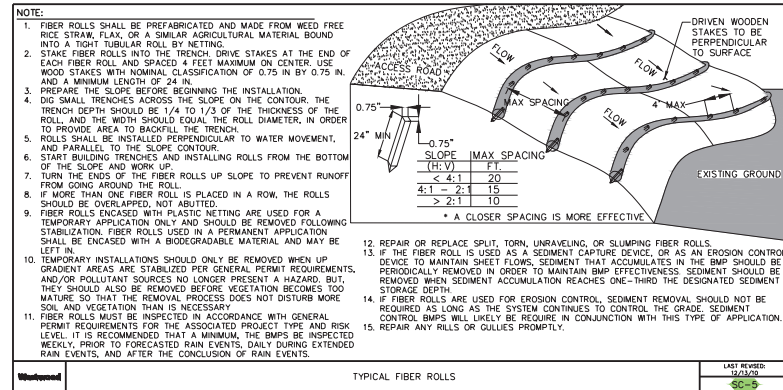
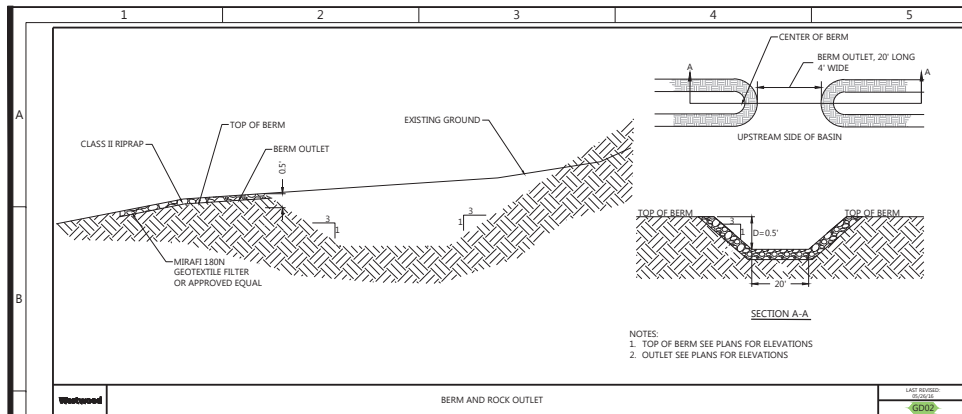
SHEET: 5

MATERIALS & WASTE MANAGEMENT BMP'S

| | |
|------|------------------------------|
| WM-1 | MATERIAL DELIVERY & STORAGE |
| WM-4 | SPILL PREVENTION AND CONTROL |
| WM-8 | CONCRETE WASTE MANAGEMENT |
| WM-5 | SOLID WASTE MANAGEMENT |
| WM-9 | SANITARY WASTE MANAGEMENT |
| WM-6 | HAZARDOUS WASTE MANAGEMENT |

TEMPORARY RUNOFF CONTROL BMP'S

| | |
|-----------------------------|-------|
| CEMENT WASH AREA | CWA |
| VEHICLE TRACKING CONTROL | TC-1 |
| EROSION CONTROL BLANKET | EB |
| SURFACE ROUGHENING | SR |
| TEMPORARY OUTLET PROTECTION | EC-10 |
| STREET SWEEPING | SC-7 |
| HYDROSEEDING | SS-4 |
| SILT FENCE | SC-1 |
| LIMITS OF DISTURBANCE | LOD |



PREPARED FOR:

Valley Center ESS, LLC
 11455 El Camino Real Suite 160
 San Diego, CA 92130

| REVISION: | DATE | COMMENT |
|-----------|----------|------------------------------------|
| A | 06/24/20 | Issued for Drainage Review |
| B | 06/29/20 | For SWQMP Submittal |
| C | 06/08/20 | For Address County Review Comments |
| | | |
| | | |

**Valley Center
Storage Project**
 San Diego County,
 California

Details

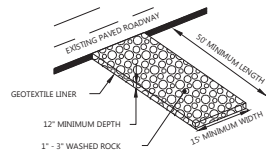
Not For Construction

DATE: 06/08/2020

SHEET: 6

2025 RELEASE UNDER E.O. 14176

ACCESS ROADS SHALL BE CONSTRUCTED FROM PUBLIC ROADS WHERE THE CONSTRUCTION DELIVERY TRAFFIC WILL TRAVEL ON THE CONSTRUCTED ACCESS ROAD. SEDIMENT TRACKING ONTO PUBLIC PAVED ROADS IS NOT ANTICIPATED. IF SEDIMENT TRACKING DOES OCCUR, THE SEDIMENT SHALL BE REMOVED AND A ROCK CONSTRUCTION ENTRANCE CONSTRUCTED



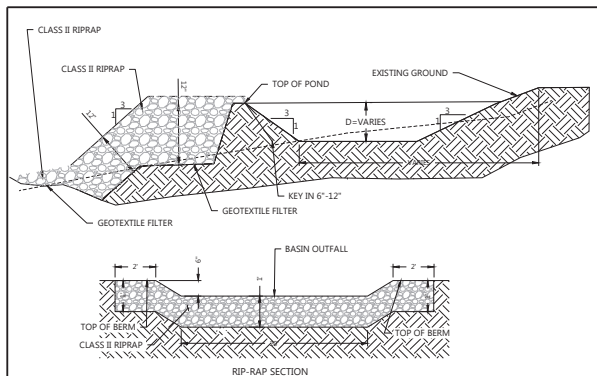
NOTE:
ROCK CONSTRUCTION ENTRANCE SHOULD BE A MINIMUM THICKNESS OF 1.0' AND CONTAIN MAXIMUM SIDE SLOPES OF 4:1. ROCK ENTRANCES SHOULD BE INSPECTED AND MAINTAINED REGULARLY. ROCK ENTRANCE LENGTH MAY NEED TO BE EXTENDED IN CLAY SOILS.

| | | | |
|----------|----------------------------|--------------------------|------|
| Westwood | ROCK CONSTRUCTION ENTRANCE | LAST REVISED: 4/13/16 | TC-2 |
|----------|----------------------------|--------------------------|------|

GRADING NOTES

- ALL GRADING SHALL CONFORM TO KERN COUNTY GRADING CODE AND STANDARDS PERTAINING THERETO AS WELL AS THE GEOTECHNICAL ENGINEERING REPORT FOR VOYAGER 2, 3 AND 4 WIND PROJECT BY RBC DATED AUGUST 17, 2017.
- ALL DESIGN ELEVATIONS SHOWN ARE TO FINISHED GRADE WITH THE EXCEPTION OF THE SUBSTATION FENCED AREA. THE FENCED AREA IS SHOWN TO SUBGRADE WITH THE FINAL ROCK LAYER PLACED ON TOP OF THE ELEVATIONS SHOWN.
- THE CONTRACTOR SHALL BE RESPONSIBLE FOR GRADING THE PADS WITHIN 0.1 FOOT OF ELEVATIONS SHOWN CONTRACTOR SHALL OBTAIN ALL NECESSARY PERMITS BEFORE START OF CONSTRUCTION.
- THE EXISTING ELEVATIONS AND CONTOURS SHOWN ON THESE CONSTRUCTION DRAWINGS WERE PREPARED FROM A TOPOGRAPHIC FIELD SURVEY PREPARED BY SMITHCO DATED AUGUST 2017.
- THE CONTRACTOR SHALL NOTIFY CALIFORNIA 811 AT LEAST 48 HOURS BEFORE EXCAVATION ACTIVITIES COMMENCE.
- THE CONTRACTOR SHALL EXERCISE SUFFICIENT SUPERVISORY CONTROL DURING GRADING AND CONSTRUCTION TO ENSURE COMPLIANCE WITH THE APPROVED PLANS.
- CONTRACTOR SHALL NOTIFY THE GRADING INSPECTOR PRIOR TO INITIATING WORK. CUT AND FILL SLOPES SHALL BE NO STEEPER THAN 2 HORIZONTAL TO 1 VERTICAL UNLESS THE SOILS ENGINEER OR GEOLOGICAL ENGINEER, OR BOTH, INVESTIGATE THE SITE AND PROVIDE AN OPINION THAT A CUT AT A STEEPER SLOPE WILL BE STABLE AND NOT CREATE A HAZARD TO PUBLIC OR PRIVATE PROPERTY. CODE OF BUILDING REGULATIONS SECTION 17.28.100-B.
- FILL SLOPES SHALL NOT BE CONSTRUCTED ON NATURAL SLOPES STEEPER THAN TWO HORIZONTAL TO ONE VERTICAL. CODE OF BUILDING REGULATIONS SECTION 17.28.110-B.
- FILL AREA SLOPING STEEPER THAN 5 HORIZONTAL TO 1 VERTICAL SHALL BE KEYED AND BENCHMARKED TO SUPPORT FILL. CODE OF BUILDING REGULATIONS SECTION 17.28.110-C. STEEPER SLOPES MAY BE ALLOWED ONLY IF GEOTECHNICAL ENGINEER COMPLETES A SLOPE STABILITY ANALYSIS.
- ALL FILL AREAS SHALL BE CLEARED OF VEGETATION AND OTHER UNSUITABLE MATERIAL FOR A STRUCTURAL FILL AND THE AREAS SCARIFIED TO A DEPTH OF SIX INCHES. DETRIMENTAL AMOUNTS OF ORGANIC MATERIAL SHALL NOT BE PERMITTED IN FILLS. NO ROCK OR SIMILAR IRREDUCIBLE MATERIAL WITH A MINIMUM DIMENSION GREATER THAN 12 INCHES SHALL BE BURIED OR PLACED IN FILLS. CODE OF BUILDING REGULATIONS SECTION 17.28.110-D.
- BERMS OR DRAINAGE DEVICES SHALL BE PLACED AT THE TOP OF ALL FILL SLOPES. DRAINAGE AND TERRACING SHALL BE PROVIDED PER CODE OF BUILDING REGULATIONS 17.28.130.
- SURFACE DRAINAGE SHALL HAVE A DRAINAGE GRADIENT OF 2 PERCENT TOWARD APPROVED DRAINAGE FACILITIES, UNLESS WAIVED BY THE BUILDING OFFICIAL PER SECTION 17.28.130-D.
- EROSION WILL BE CONTROLLED BY PLANTING, CHECK DAMS, CRIBBING, RIPRAP, OR OTHER METHODS AS DESCRIBED IN THE STORMWATER POLLUTION PREVENTION PLAN. (CODE OF BUILDING REGULATIONS SECTION 17.28.140-B.)
- THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE WORK TO BE PERFORMED IN ACCORDANCE WITH THE APPROVED PLANS AND SPECIFICATIONS AND IN CONFORMANCE WITH THE PROVISIONS OF THE CODE OF BUILDING REGULATIONS. THE CONTRACTOR SHALL ENGAGE CONSULTANTS, IF REQUIRED, TO PROVIDE PROFESSIONAL INSPECTIONS ON A TIMELY BASIS. IN THE EVENT OF CHANGED CONDITIONS, THE CONTRACTOR SHALL BE RESPONSIBLE FOR INFORMING THE BUILDING OFFICIAL OF SUCH CHANGE AND SHALL PROVIDE REVISED PLANS FOR APPROVAL. CODE OF BUILDING REGULATIONS 17.28.170-E.
- FILL MATERIALS SHALL BE PLACED IN LAYERS NOT EXCEEDING 12 INCHES IN A LOOSE CONDITION FOR ROADWAY FILLS AND NOT EXCEEDING 8 INCHES IN A LOOSE CONDITION FOR FOUNDATION FILLS AND SHALL BE COMPACTED TO A MINIMUM OF 97 PERCENT DENSITY OF THE MAXIMUM DENSITY AND AT OPTIMUM MOISTURE CONTENT BY APPROVED METHOD AND CERTIFIED BY TESTS AND REPORTS PERFORMED BY A SOILS ENGINEER.
- AFTER ALL WORK, INCLUDING THE INSTALLATION OF DRAINAGE STRUCTURES AND PROTECTION HAS BEEN COMPLETED AND REQUIRED REPORTS HAVE BEEN SUBMITTED, THE CONTRACTOR SHALL REQUEST A ROUGH GRADING INSPECTION FROM THE KERN COUNTY BUILDING DEPARTMENT OR THE ENGINEER OF RECORD.
- I HEREBY CERTIFY THAT THIS PLAN AND SPECIFICATION HAS BEEN PREPARED IN CONFORMANCE WITH CHAPTER 19.88 (HILLSIDE DEVELOPMENT) OF THE KERN COUNTY ZONING ORDINANCE.

CHRISTOPHER J. CARDA, PE LICENSE NO. 75332



- NOTES:
- OUTLET SEE PLANS FOR ELEVATIONS
 - TOP OF BERM SEE PLANS FOR ELEVATIONS

| | | | |
|----------|---|---------------------------|-------|
| Westwood | TYPICAL INFILTRATION BASIN AND OVERFLOW CROSS SECTION | LAST REVISED: 11/20/19 | GD-02 |
|----------|---|---------------------------|-------|

EROSION CONTROL NOTES

- ALL GRADING AND CONSTRUCTION ACTIVITIES SHALL COMPLY WITH THE PROJECT SWPPP REQUIREMENTS AND RECOMMENDATIONS ESTABLISHED FOR THIS PROJECT. CONTRACTOR MAY ADD ADDITIONAL BMP'S AS REQUIRED TO CONTROL EROSION AND SEDIMENTATION BOTH DURING AND AFTER CONSTRUCTION. REFER TO SWPPP BOOKLET FOR A COMPLETE LIST OF POTENTIAL BMP'S THAT MAY BE IMPLEMENTED.
- GUIDELINES FOR THE IMPLEMENTATION OF THE APPROPRIATE BMP ELEMENTS ARE AS OUTLINED IN THE CALIFORNIA STORMWATER QUALITY ASSOCIATION'S PUBLICATION "STORMWATER BEST MANAGEMENT PRACTICE HANDBOOK FOR CONSTRUCTION". THIS DOCUMENT IS CONSIDERED TO BE INCLUDED AS AN INTEGRAL PART OF THIS SWPPP AND IS AVAILABLE FOR DOWNLOAD AT WWW.CABMPHANDBOOKS.COM
- CONTRACTOR SHALL PROVIDE EROSION CONTROL MEASURES AS PLANNED AND SPECIFIED FOLLOWING BEST MANAGEMENT PRACTICES AS OUTLINED BY THE LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD. EROSION CONTROL PLAN SHALL BE IN CONFORMANCE WITH THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL STORMWATER PERMIT. SEE THE ASSOCIATED STORMWATER POLLUTION PREVENTION PLAN (SWPPP) FOR EROSION CONTROL SPECIFICATIONS. UNLESS OTHERWISE NOTED OR MODIFIED HEREIN, ALL SECTIONS OF THE GENERAL CONDITIONS SHALL APPLY.
- EFFORTS SHALL BE MADE TO MINIMIZE SOIL DISTURBANCE TO AREAS OUTSIDE OF THE DISTURBANCE LIMITS.
- THE CONTRACTOR SHALL MAKE ALL EFFORTS TO KEEP ACTIVITIES WITHIN THE AREAS SHOWN ON THE PLANS BUT IT IS UNDERSTOOD THAT SOME ACTIVITIES THAT WILL NOT REQUIRE GRADING OR SOIL DISTURBANCE MAY EXTEND BEYOND THE DEFINED LIMITS.
- RE-SEEDING OF DISTURBED AREAS SHALL CONFORM TO THE SPECIFICATIONS OF THE HABITAT RESTORATION PLAN. EROSION CONTROL BLANKETS OR POLYMER STABILIZED FIBER MATRIX SHALL BE APPLIED ON EXPOSED SLOPES TO CONTROL DUST AND EROSION.
- ALL PUBLIC STREETS SHALL BE MAINTAINED FREE OF DUST AND MUD CAUSED BY THE GRADING OPERATIONS.
- TEMPORARY SEEDING - WITHIN 14 DAYS AFTER CONSTRUCTION ACTIVITY CEASES ON ANY PARTICULAR AREA, ALL DISTURBED GROUND WHERE THERE WILL NOT BE CONSTRUCTION FOR LONGER THAN 21 DAYS MUST BE SEED WITH FAST-GERMINATING TEMPORARY SEED AND PROTECTED WITH MULCH.
- PERMANENT SEEDING - ALL AREAS AT FINAL GRADE MUST BE SEED WITHIN 14 DAYS AFTER COMPLETION OF THE MAJOR CONSTRUCTION ACTIVITY. EXCEPT FOR SMALL LEVEL SPOTS, SEEDING AREAS SHOULD GENERALLY BE PROTECTED WITH MULCH.
- CONTRACTOR SHALL COMPLY WITH THE EASTERN KERN AIR POLLUTION CONTROL DISTRICT FUGITIVE DUST CONTROL PLAN (RULE 402). PREVENTATIVE MEASURES TO BE TAKEN BY THE CONTRACTOR SHALL INCLUDE, BUT NOT LIMITED TO, THE FOLLOWING:
 - WATER SHALL BE APPLIED TO ALL UNPAVED AREAS AS REQUIRED TO PREVENT THE SURFACES FROM BECOMING DRY ENOUGH TO PERMIT DUST FORMATION.
 - PAVED SURFACES OVER WHICH VEHICULAR TRAFFIC IS PERMITTED TO TRAVEL SHALL BE KEPT FREE OF DIRT.

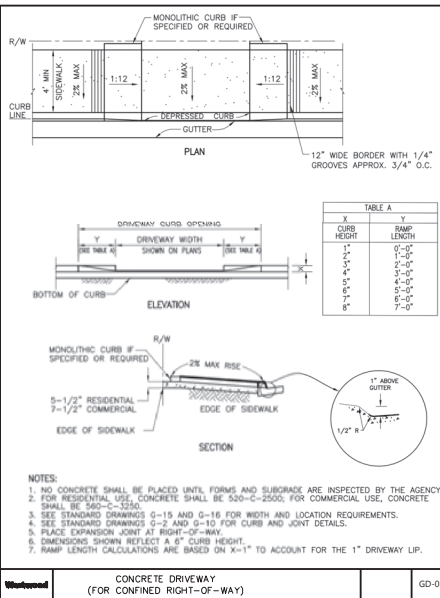
BMPs

THE FOLLOWING IS A LIST OF ANTICIPATED BMPs, OTHERS MAY BE USED AS NEEDED OR RECOMMENDED BY THE SITE SWPPP COMPLIANCE PERSONNEL. ADDITIONAL BMPs MAY BE REQUIRED AS PRESCRIBED BY THE PROJECT SWPPP. REFER TO CALIFORNIA STORMWATER BMP HANDBOOK FOR ADDITIONAL INFORMATION.

- EC-3
- EC-4
- EC-7
- EC-10
- EC-15
- SE-5
- TC-1
- TC-2
- GD08
- GD06

TC-2

STABILIZED CONSTRUCTION ROADWAY - BMP FOR ACCESS ROAD CONSTRUCTION AND MAINTENANCE. USE AS NEEDED IN AREAS WHERE EROSION AND SEDIMENT IS A PROBLEM AND IS IN THE VICINITY OF EXISTING DRAINAGEWAYS.



| | | | |
|----------|---|--|-------|
| Westwood | CONCRETE DRIVEWAY (FOR CONFINED RIGHT-OF-WAY) | | GD-03 |
|----------|---|--|-------|

Westwood

Phone (852) 937-5150 12701 Whitewater Drive, Suite #300
Fax (852) 937-5822 Minnetonka, MN 55343
Toll-Free (888) 937-5150 westwoodco.com

Westwood Professional Services, Inc.



PREPARED FOR:

Valley Center ESS, LLC
11455 El Camino Real Suite 160
San Diego, CA 92130

| REVISION: | # | DATE | COMMENT |
|-----------|----------|--|---------|
| A | 04/24/20 | Issued for Drainage Review | |
| B | 04/29/20 | For SWQMP Submittal | |
| C | 06/08/20 | Issued to Address County Review Comments | |
| | | | |
| | | | |

**Valley Center
Storage Project**
San Diego County,
California

Details

Not For Construction

DATE: 06/08/2020

SHEET: 7

1 - 110



PREPARED FOR:

Valley Center ESS, LLC
11455 El Camino Real Suite 160
San Diego, CA 92130

| REVISIONS: | | |
|------------|----------|--|
| | DATE | COMMENT |
| A | 04/24/20 | Issued for Drainage Review |
| B | 04/30/20 | For SWQMP Submittal |
| C | 06/08/20 | Issued to Address County Review Comments |

1-111

Valley Center
Storage Project
San Diego County,
California

Notes

Not For Construction

DATE: 06/08/2020

SHEET: 8

ROAD DESIGN PARAMETERS

- THE ROAD HAS BEEN DESIGNED TO ACCOMMODATE HS-20 VEHICLE LOADING AT A MINIMUM DURING CONSTRUCTION AND LIGHT DUTY TRUCKS FOR LOW VOLUME USE IN NORMAL OPERATING CONDITIONS. THE ROAD DESIGN SPECIFIED IS NOT INTENDED FOR ALL WEATHER USE FOR HEAVY DUTY, HIGH VOLUME, CONSTRUCTION LOADS.
- ROAD MAINTENANCE CAN BE EXPECTED DURING CONSTRUCTION AND OVER THE LIFE OF THE PERMANENT FACILITY.
- ROAD SECTION AND SPECIFICATION SHOWN ON THE PLANS WERE PREPARED BY WESTWOOD PROFESSIONAL SERVICES.

PRODUCTS

- ACCESS ROAD AGGREGATE SHALL MEET CALTRANS SPECIFICATIONS FOR GRADED AGGREGATE BASE COURSE.
- GEOTEXTILE FABRIC SHALL BE MIRAFT HP270 OR APPROVED EQUAL (IF USED).

EXECUTION

- SITE PREPARATION
 - THE CONTRACTOR SHALL BE REQUIRED TO CLEAR AND GRUB AREAS DESIGNATED ON THE PLANS REMOVING ALL TREES, STUMPS, BRUSH AND DEBRIS. TREES AND BRUSH LOCATED OUTSIDE OF THE PROJECT DEVELOPMENT AREA SHALL NOT BE DISTURBED.
 - THE CONTRACTOR SHALL PRESERVE EXISTING VEGETATION TO THE MAXIMUM EXTENT PRACTICABLE. ANY VEGETATION THAT IS REMOVED SHALL ONLY BE ALLOWED WITHIN THE PROJECT BOUNDARY. THE CONTRACTOR IS TO REMOVE ONLY THAT VEGETATION WHICH SHALL BE DESIGNATED BY THE OWNERS REPRESENTATIVE FOR REMOVAL, AND SHALL EXERCISE EXTREME CARE AROUND EXISTING VEGETATION TO BE SAVED. CONSTRUCTION FENCING MAY BE INSTALLED TO PROTECT AREAS THAT ARE NOT TO BE DISTURBED.
 - NO BURNING OF DEBRIS IS ALLOWED WITHOUT THE NECESSARY PERMITS FROM JURISDICTIONAL GOVERNING AUTHORITIES AND APPROVAL BY THE OWNER.
- FILL MATERIALS AND PLACEMENT
 - ALL FILL MATERIALS SHALL BE INORGANIC SOILS FREE OF VEGETATION, DEBRIS, AND FRAGMENTS LARGER THAN THREE (3) INCHES IN SIZE. PEA GRAVEL OR OTHER SIMILAR NON-CEMENTITIOUS, POORLY-GRADED MATERIALS SHALL NOT BE USED AS FILL OR BACKFILL WITHOUT THE PRIOR APPROVAL OF THE GEOTECHNICAL ENGINEER.
 - CLEAN ON-SITE SOILS OR APPROVED IMPORTED MATERIAL MAY BE USED AS FILL MATERIAL FOR GENERAL SITE GRADING. THIS MATERIAL SHALL BE PLACED IN LOOSE LIFTS NOT TO EXCEED 9".
 - ANY IMPORTED SOILS MUST HAVE EXPANSION VALUES IN THE "VERY LOW" RANGE (IF REQUIRED).

ACCESS ROAD CONSTRUCTION AND SITE GRADING

- TOPSOIL MANAGEMENT
 - TOPSOIL SHALL BE STRIPPED FROM ALL ROADWAY AREAS (TYPICALLY 6"). TOPSOIL STRIPPING AREAS SHALL BE STRIPPED THROUGH THE TOPSOIL DEPTH. TOPSOIL SHALL NOT BE STRIPPED OUTSIDE OF THESE DESIGNATED AREAS.
 - STRIPPED MATERIALS CONSISTING OF VEGETATION AND ORGANIC MATERIALS SHALL BE STOCKPILED ON THE SITE AWAY FROM NATIVE EXCAVATED SOIL. STOCKPILES WITHIN THE SITE SHALL HAVE TEMPORARY EROSION AND SEDIMENT CONTROL APPLIED IN ACCORDANCE WITH THE PROJECT SHIPPY OR USED TO REVEGETATE LANDSCAPED AREAS OR EXPOSED SLOPES AFTER COMPLETION OF GRADING OPERATIONS. IF IT IS NECESSARY TO DISPOSE OF ORGANIC MATERIALS ON-SITE THEY MAY BE USED AS FILL IN NON-STRUCTURAL AREAS OUTSIDE OF THE PROPOSED FACILITIES AREA WHERE SOIL STRENGTH AND COMPRESSIBILITY WOULD NOT IMPACT SITE INFRASTRUCTURE.
- EMBANKMENTS
 - EMBANKMENT CONSTRUCTION SHALL CONSIST OF THE PLACING OF SUITABLE FILL MATERIAL, AFTER TOPSOIL STRIPPING, ABOVE THE EXISTING GRADE AS INDICATED ON CIVIL PLANS. GENERALLY, EMBANKMENT SHALL HAVE COMPACTED SUPPORT SLOPES OF THREE FEET HORIZONTAL TO ONE FOOT VERTICAL.
 - SLOPES GREATER THAN 5:1 FEET IN HEIGHT SHALL BE BENCHED INTO THE EXISTING SLOPE TO PREVENT MOVEMENT BETWEEN THE FILL AND NATIVE SOILS (SEE GEOTECHNICAL REPORT, SECTION 5.2.6).
 - THE MATERIAL FOR EMBANKMENT CONSTRUCTION SHALL BE GENERATED ON SITE BY THE CONTRACTOR FROM THE CUT AREA. THIS MATERIAL SHALL BE PLACED IN LOOSE LIFTS NOT TO EXCEED 9".
 - ALL SLOPES SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE GRADING SHOWN ON THE PLANS.
 - EXPOSED SURFACES SHALL BE FREE OF MOUNDS AND DEPRESSIONS WHICH COULD PREVENT UNIFORM COMPACTION. SEE TABLE 1

FOR TESTING REQUIREMENTS AND TABLE 2 FOR COMPACTION REQUIREMENTS.

SITE GRADING

- SUBSEQUENT TO THE SURFACE CLEARING, GRUBBING AND TOPSOIL REMOVAL IN AREAS SHOWN ON THE PLANS, THE SUBSURFACE SOILS SHALL HAVE THE GRADES AND ELEVATIONS MOORED AS SHOWN ON THE PLANS, THE PROPOSED CONTOURS AND ELEVATIONS SHOWN ON THE PLANS ARE TO TOP OF SUBGRADE WITHIN THE FENCED AREA AND TOP OF AGGREGATE BASE COURSE FOR THE ACCESS ROAD.
 - SUBSURFACE SOILS SHALL BE MOISTURE CONDITIONED AND COMPACTED TO THE SPECIFICATIONS OF TABLE 2.
 - ANY CUT MATERIAL THAT CANNOT BE USED FOR STRUCTURAL BACKFILL THROUGHOUT THE PROJECT SHALL BE USED IN FILL AREAS IDENTIFIED ON THE PLANS. THE FILL AREA SHALL HAVE TOPSOIL REMOVED AND MANAGED AS IDENTIFIED ABOVE IN "TOPSOIL MANAGEMENT".
 - CLEAN, ORGANIC FREE, ON-SITE SOILS OR APPROVED IMPORTED MATERIAL MAY BE USED AS SUBGRADE MATERIAL FOR GENERAL SITE GRADING.
- SUBGRADE PREPARATION
 - SUBSEQUENT TO THE SURFACE CLEARING, GRUBBING, TOPSOIL REMOVAL AND EMBANKMENT CONSTRUCTION, THE EXPOSED SUBGRADE SOILS SHALL BE SCARIFIED TO A MINIMUM DEPTH OF NINE (9) INCHES, MOISTURE CONDITIONED AND COMPACTED TO THE SPECIFICATIONS OF TABLE 2. THE COMPACTED EXPOSED SUBGRADES SHALL BE PROOF ROLLED AND OBSERVED BY A GEOTECHNICAL ENGINEER TO DETERMINE IF SOFT SOILS EXIST. IF SOFT SOILS EXIST THEY SHALL BE SCARIFIED AND ALLOWED TO DRY, RECOMPACTED AND TESTED AGAIN. IF THEY CONTINUE TO REMAIN SOFT, FOLLOWING SCARIFICATION, DRYING AND RECOMPACTION EFFORTS ADDITIONAL AGGREGATE MAY BE ADDED FOR STABILITY.
 - ROAD SUBGRADE AND COMPACTION SHALL EXTEND HORIZONTALLY AT LEAST TWO FEET BEYOND THE OUTSIDE EDGE OF THE DRIVABLE SURFACE.
 - THE MOISTURE CONTENT AND COMPACTION OF ROAD SUBGRADE SOILS SHALL BE MAINTAINED UNTIL PAVEMENT CONSTRUCTION.
 - CLEAN, ORGANIC FREE, ON-SITE SOILS OR APPROVED IMPORTED MATERIAL MAY BE USED AS SUBGRADE MATERIAL FOR GENERAL SITE GRADING AND ROADWAY AREAS.
 - AGGREGATE PLACEMENT
 - ACCESS ROADS - SUBSEQUENT TO THE SUBGRADE PREPARATION THE ROAD AGGREGATE BASE SHALL BE PLACED AND COMPACTED TO THE SPECIFICATIONS IDENTIFIED IN TABLE 2.
 - TOPSOIL REDISTRIBUTION AND STABILIZATION
 - FOLLOWING THE PLACEMENT OF THE AGGREGATE BASE AND APPROVAL OF THE TESTING, TOPSOIL SHALL BE DISTRIBUTED OVER THE EXPOSED DISTURBED AREAS, EXCLUDING THE AGGREGATE DRIVING SURFACE.
 - FOLLOWING SITE GRADING OPERATIONS, TOPSOIL CAN BE USED TO BRING THE GROUND ELEVATIONS UP TO THE DESIGNED FINISHED GRADE ELEVATIONS.
 - THE TOPSOIL SHALL HAVE TEMPORARY AND PERMANENT STABILIZATION MEASURES ESTABLISHED IN ACCORDANCE WITH THE PROJECT SWPPP.

TEMPORARY LAYDOWN/STORAGE YARD

- PREPARATION
 - THE LAYDOWN/STORAGE YARD SHALL CONSIST OF COMPACTED NATIVE MATERIAL OVERLAIN WITH A GEOTEXTILE FABRIC (OPTIONAL) AND AGGREGATE MATERIAL.
 - THE COMPACTED NATIVE MATERIAL SHALL BE MOISTURE CONDITIONED AND COMPACTED TO THE SPECIFICATIONS OF TABLE 2 (NON-STRUCTURAL AREAS).
 - GEOTEXTILE FABRIC SHALL BE PLACED ON TOP OF COMPACTED NATIVE MATERIAL AND THEN AGGREGATE PLACED AND COMPACTED.
 - FOLLOWING CONSTRUCTION AND REMOVAL OF PROJECT INVENTORY THE COMPACTED NATIVE MATERIAL SHALL BE DECOMPACTED AND PERMANENTLY STABILIZED IN ACCORDANCE WITH THE PROJECT SWPPP SPECIFICATIONS.
- ELECTRICAL TRENCHES (BY OTHERS)
 - TRENCHES SHALL BE EXCAVATED TO THE DEPTH IDENTIFIED IN THE ELECTRICAL DRAWINGS/DETAILS (BY OTHERS).
 - TRENCH BACKFILL SHALL CONSIST OF APPROVED ONSITE OR IMPORT SOILS OR FLOW FILL. SOILS SHALL BE FREE OF VEGETATION, DEBRIS, AND FRAGMENTS LARGER THAN 3/8 INCHES, AS REQUIRED BY ELECTRICAL DRAWINGS/DETAILS (BY OTHERS).
 - ELASTIC SILT IS NOT RECOMMENDED FOR TRENCH BACKFILL.
- BACKFILL SHALL BE COMPACTED TO THE GREATER OF 90% MAXIMUM DRY DENSITY IN NON-STRUCTURAL AREAS OR TO THE MINIMUM SHOWN IN TABLE 2 BELOW FOR OTHER FILLED AREAS.
- TRENCH BACKFILL SHALL BE MECHANICALLY COMPACTED.

TABLE 1: TESTING SCHEDULE SUMMARY

| LOCATION | TEST | FREQUENCY |
|-----------------------------------|---|---|
| STRUCTURAL FILL | GRAIN SIZE ANALYSIS, MOISTURE CONTENT, ATTERBERG LIMITS ON FINES CONTENT, AND PROCTOR | 1 PER MAJOR SOIL TYPE |
| COMPACTED SUBGRADE (ROAD AND PAD) | MOISTURE DENSITY TEST (NUCLEAR DENSITY) | 1 |
| | PROOF-ROLL | ENTIRE ROAD LENGTH AND PAD |
| | DYNAMIC CONE PENETROMETER TEST (DCP) | 1 |
| AGGREGATE BASE | MOISTURE DENSITY TEST (NUCLEAR DENSITY) | 1 |
| | PROOF-ROLL | ENTIRE LENGTH |
| | SIEVE ANALYSIS | 1 |
| MISCELLANEOUS FILL: | MOISTURE DENSITY TEST (NUCLEAR DENSITY) | 1 PER 2 FOOT VERTICAL LIFTS AND/OR 500 C.Y. OF MATERIAL |
| TRENCH BACKFILL: | MOISTURE DENSITY TEST (NUCLEAR DENSITY) | 1 EVERY 100 LF OF TRENCH, ALTERNATE TEST DEPTHS OF 18" AND AT GRADE |

TABLE 2: COMPACTION AND MOISTURE CONTENT REQUIREMENTS

| MATERIAL TYPE AND LOCATION | MINIMUM STANDARD PROCTOR COMPACTION REQUIREMENT (%) | RANGE OF MOISTURE CONTENTS FOR COMPACTION (% OVER OPTIMUM) | |
|---|---|--|---------|
| | | MINIMUM | MAXIMUM |
| AGGREGATE BASE | 98 | | |
| STRUCTURAL FILL (BENEATH SLABS AND FOUNDATIONS) | 98 | -3% | +3% |
| STRUCTURAL FILL (GRADING & AROUND FOUNDATIONS) | 95 | -3% | +3% |
| SUBGRADE (BENEATH EQUIPMENT PADS, NATIVE MATERIAL) | 95 | -3% | +3% |
| SUBGRADE (BENEATH EQUIPMENT PADS, IMPORT NON-EXPANSIVE SOILS) | 95 | -3% | +3% |
| TRENCH BACKFILL (NON-STRUCTURAL AREAS) | 90 | | |
| TRENCH BACKFILL (STRUCTURAL AREAS) | 90 | | |
| NON-STRUCTURAL FILL | 90 | | |

TESTING REQUIREMENTS

DEFINITIONS

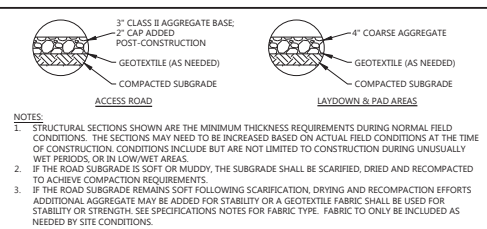
- THE CONTRACTOR SHALL SUBMIT MATERIAL TESTING REPORTS AS SHOWN ON THE DRAWINGS AS WELL AS GEOTEXTILE MATERIAL TO BE USED DURING CONSTRUCTION.
- TESTING SHALL BE PERFORMED BY A DESIGNATED INDEPENDENT TESTING AGENCY.
- SUBMIT TESTING AND INSPECTION RECORDS SPECIFIED TO THE CIVIL ENGINEER OF RECORD FOR REVIEW.
 - THE ENGINEER WILL REVIEW THE TESTING AND INSPECTION RECORDS TO CHECK CONFORMANCE WITH THE DRAWINGS AND SPECIFICATIONS. THE ENGINEER'S REVIEW DOES NOT RELIEVE THE CONSTRUCTION CONTRACTOR FROM THE RESPONSIBILITY FOR CORRECTING DEFECTIVE WORK.
- PROOF ROLLING SHALL BE PERFORMED IN THE PRESENCE OF THE GEOTECHNICAL ENGINEER OR QUALIFIED GEOTECHNICAL REPRESENTATIVE USING A FULLY LOADED TANDDEM OR TR-AXLE TRUCK WITH A MINIMUM GROSS WEIGHT OF 25 TONS AND MINIMUM AXLE LOADING OF 10 TONS. PROOF-ROLLING ACCEPTANCE STANDARDS INCLUDE NO RUTTING GREATER THAN 1.5 INCHES, AND NO "PUMPING" OF THE SOIL BEHIND THE LOADED TRUCK.
- SIEVE ANALYSIS SHALL BE CONDUCTED IN ACCORDANCE WITH ASTM C136
- PROCTORS SHALL BE DETERMINED IN ACCORDANCE WITH ASTM D698
- ATTERBERG LIMITS SHALL BE DETERMINED IN ACCORDANCE WITH ASTM D4318
- MOISTURE DENSITY (NUCLEAR DENSITY) TESTING SHALL BE DONE IN ACCORDANCE WITH ASTM D6938
- DYNAMIC CONE PENETROMETER (DCP) TESTING SHALL BE DONE IN ACCORDANCE WITH ASTM D6951-03

REQUIREMENTS

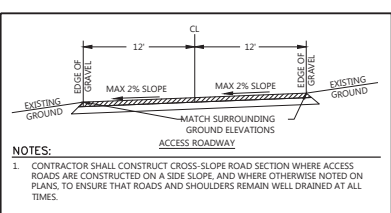
- COMPACTION:
 - REFER TO TABLE 1 AND 2 FOR COMPACTION REQUIREMENTS AND ACCEPTABLE MOISTURE CONTENTS.
- IMPORT FILL MATERIAL:
 - IMPORT SOILS USED AS FILL MATERIAL SHALL BE TESTED FOR GRAIN SIZE ANALYSIS, MOISTURE CONTENT, ATTERBERG LIMITS ON FINES CONTENT, PROCTOR TESTS, R-VALUES, SAND EQUIVALENTS, DURABILITY INDEX, LIQUID LIMIT, PLASTICITY INDEX, AND MAXIMUM EXPANSION INDEX.
- COMPACTED SUBGRADE:
 - THE ENTIRE INTERNAL/ACCESS ROAD SUBGRADE SHALL BE PROOF-ROLLED PRIOR TO THE PLACEMENT OF THE AGGREGATE BASE TO IDENTIFY AREAS OF UNSTABLE SUBGRADE. IF UNSTABLE SUBGRADE IS ENCOUNTERED, SCARIFY, MOISTURE CONDITION, AND RECOMPACT SOILS TO ACHIEVE COMPACTION.
- AGGREGATE BASE:
 - AGGREGATE BASE SHALL BE PROOF-ROLLED OVER THE ENTIRE LENGTH. IF PROOF ROLLING DETERMINES THAT THE ROAD IS UNSTABLE, ADDITIONAL AGGREGATE SHALL BE ADDED UNTIL THE UNSTABLE SECTION IS ABLE TO PASS A PROOF ROLL FOR ALL ROAD CLASSIFICATIONS.

GENERAL NOTES

- CONSTRUCTION PLANS ARE BASED OFF THE CALIFORNIA STATE PLANE COORDINATE SYSTEM, NAD83, ZONE 14, US FOOT.
- THE ALTA AND GROUND TOPOGRAPHIC SURVEYS WERE PROVIDED BY SMITHCO SURVEYING ENGINEERING.
- WHERE SECTION OR SUBSECTION MONUMENTS ARE ENCOUNTERED, THE OWNER SHALL BE NOTIFIED AND ARE NOT TO BE REMOVED WITHOUT PERMISSION FROM THE OWNER. THE CONTRACTOR SHALL PROTECT AND CAREFULLY PRESERVE ALL PROPERTY MARKERS AND MONUMENTS UNTIL THE OWNER, AN AUTHORIZED SURVEYOR OR AGENT HAS WITNESSED OR OTHERWISE REFERENCED THEIR LOCATION.
- ALL CONSTRUCTION PERFORMED SHALL CONFORM WITH THE CURRENT STANDARDS AND SPECIFICATIONS OF SAN DIEGO COUNTY, WHERE DISCREPANCIES EXIST BETWEEN THE PROJECT SPECIFICATIONS AND THE COUNTY SPECIFICATIONS OR STANDARDS, THE CONTRACTOR SHALL ABIDE BY THE GREATER OR MORE RESTRICTIVE REQUIREMENTS.
- THE CONTRACTOR SHALL NOTIFY CALIFORNIA 811 (ONE CALL) AT LEAST 48 HOURS BEFORE EXCAVATION ACTIVITIES COMMENCE.
- ELECTRONIC FILES ARE AVAILABLE FOR CONSTRUCTION OPERATIONS.



1 Roadway Structural Sections
NTS



2 Access Road Cross Section
NTS

APPENDIX C –VISUAL SIMULATIONS AND RENDERINGS OF THE PROJECT SITE

Existing and Proposed Aerial Views of the Project Site



Rendering 1
Existing
aerial view
of the
Project Site
facing
southeast.

1 - 112

Existing and Proposed Aerial Views of the Project Site



Rendering 2
Proposed
aerial view
of the
Project Site
facing
southeast.

1 - 113

Existing and Proposed Aerial Views of the Project Site and Surrounding Area



Rendering 3
Existing
aerial view
of the
Project Site
(left) and
surrounding
area facing
southwest.

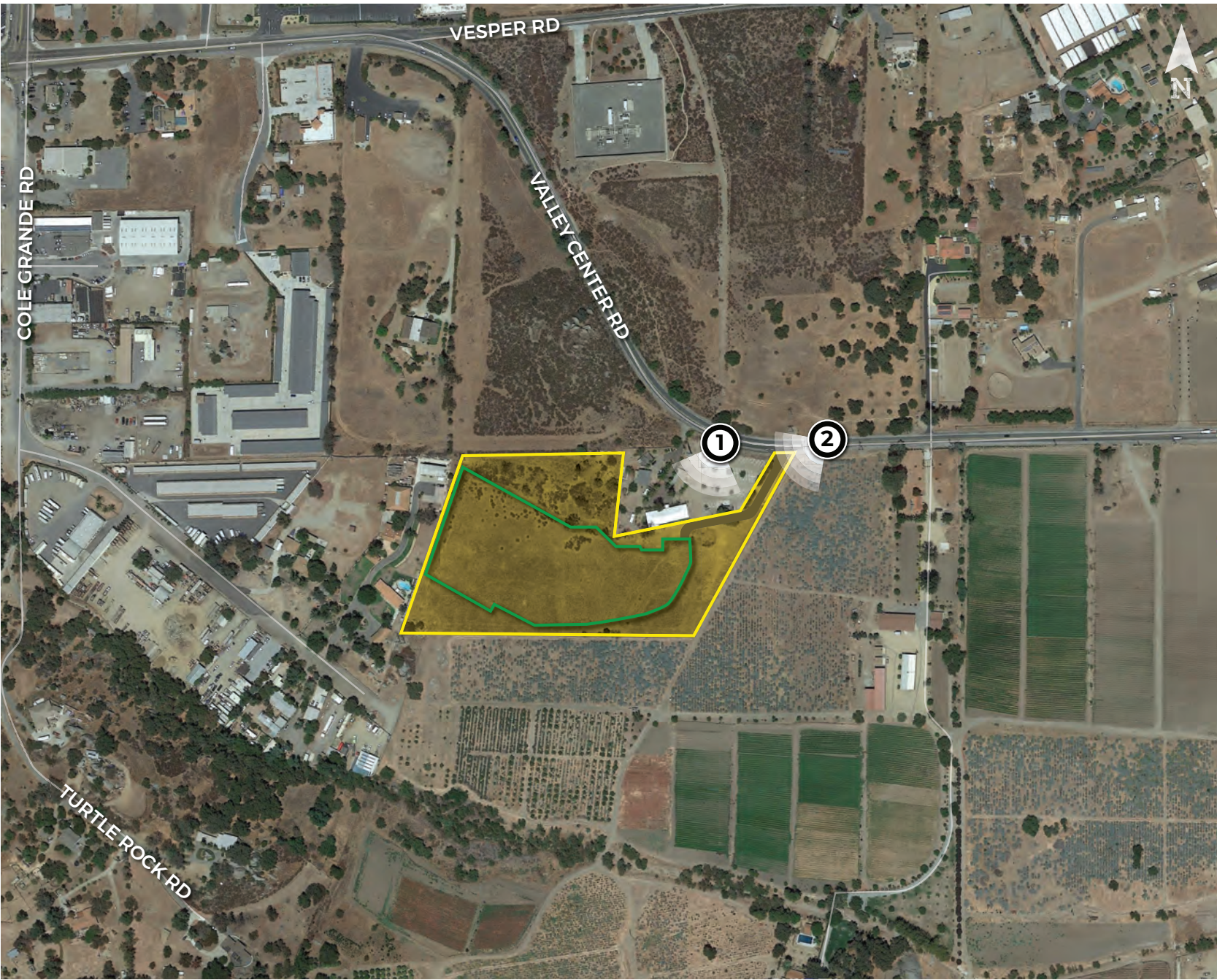
1 - 114

Existing and Proposed Aerial Views of the Project Site and Surrounding Area



Rendering 4
Proposed
aerial view
of the
Project Site
(left) and
surrounding
area facing
southwest.

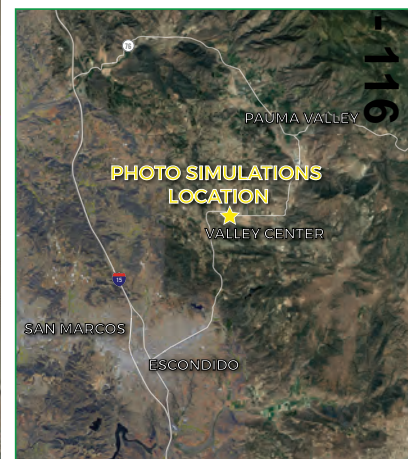
1 - 115



VALLEY CENTER STORAGE PROJECT

VIEWPOINT **MAP**

- ① PHOTO VIEWPOINT
- PROPOSED FENCING
- PROJECT SITE BOUNDARY



VALLEY CENTER ESS, LLC

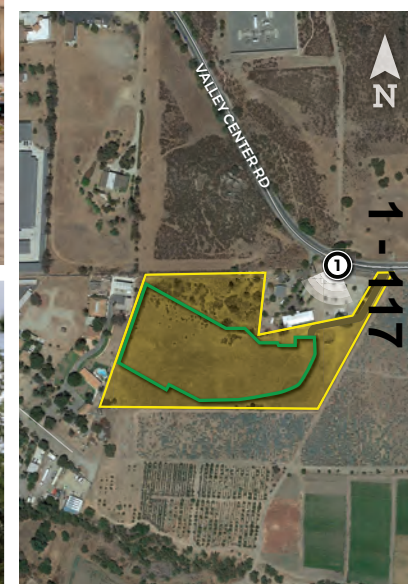
VALLEY CENTER STORAGE PROJECT

PHOTO VIEWPOINT 1

DATE: 04/11/2020

TIME: 2:15 PM

DIRECTION: SOUTH - SOUTHWEST



- ① PHOTO VIEWPOINT
- PROPOSED FENCING
- PROJECT SITE BOUNDARY

VALLEY CENTER ESS, LLC



EXISTING CONDITIONS



PROPOSED CONDITIONS

PHOTO SIMULATIONS ARE FOR DEMONSTRATION PURPOSES ONLY. FINAL DESIGN IS SUBJECT TO CHANGE PENDING PUBLIC, UTILITY, AND REGULATORY REVIEW.



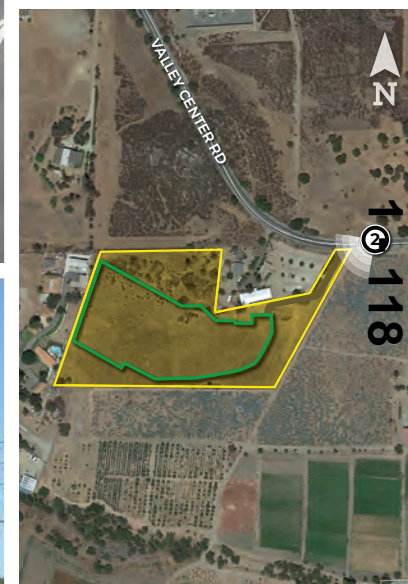
VALLEY CENTER STORAGE PROJECT

PHOTO VIEWPOINT 2

DATE: 04/25/2020

TIME: 11:31 AM

DIRECTION: SOUTHWEST



- ② PHOTO VIEWPOINT
- PROPOSED FENCING
- PROJECT SITE BOUNDARY

VALLEY CENTER ESS, LLC



EXISTING CONDITIONS



PROPOSED CONDITIONS

PHOTO SIMULATIONS CREATED BY:
 **POWER**
ENGINEERS

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APPENDIX D – VALLEY CENTER COMMUNITY CHARACTER PHOTOGRAPHS

East-Bound Views along Valley Center Road to the Project Site



Photo 1 – Joe's Country Feed & Pet and Gratzl Repair Incorporated along the south side of Valley Center Road. Photo is facing east.



Photo 2 – John Deere on south side of Valley Center Road. Photo is facing south.



Photo 3 – Valley Center Printing Co. on south side of Valley Center Road. Photo is facing south.



Photo 4 – Valley Center's Old Town Center on the south side of Valley Center Road. Photo is facing southeast.



Photo 5 –
Intersection of Valley Center Road and Cole Grade Road. Rite Aid on the southeast corner and signage for Valley Center Self Storage, CrossFit Valley Center, Delfino's Produce, and Valley Center Propane on the southwest corner. Photo is facing east.



Photo 6 – Rite Aid at the southeast corner of the Valley Center Road and Cole Grade Road intersection (also shown above). Photo is facing southeast.



Photo 7 – Impact Auto #2, Air Crafts Inc., Edward Jones, and available retail space on the southeast side of the Valley Center Road and Lizard Rocks Road intersection. Photo is facing southeast.



Photo 8 – Cruise Party Rentals in front of the Project site on the south side of Valley Center Road. Photo is facing south.

West-Bound Views along Valley Center Road from the Project Site



Photo 9 – SDG&E Valley Center Substation on the north side of Valley Center Road. Photo is facing north.



Photo 10 – Valley Center Municipal Water District on north side of Valley Center Road. Photo is facing west.



Photo 11 – First sign for Jilaberto's Mexican Food and sign for Pala Vista Gas on the northwest corner of the Valley Center Road and Cole Grade Road intersection. Photo is facing west.



Photo 12 – Second sign for Jilaberto's Mexican Food (first above), sign for Town Center Market, and California Bank & Trust; all along north side of Valley Center Road. Photo is facing northwest.



Photo 13 –
Shoemaker Realty,
Valley Center
Wireless, Summit
Mortgage
Corporation, Alliance
Propane, and
Creative Cuts on the
north side of Valley
Center Road. Photo is
facing northwest.



Photo 14 – Portino's
Fresh Italian on the
north side of Valley
Center Road. Photo is
facing northwest.



Photo 15 – Krueger Realty on the north side of Valley Center Road. Photo is facing northwest.



Photo 16 –Canyon Oaks Court on the north side of Valley Center Road. Photo is facing north.



Photo 17 – Rodriguez Nursery on the north side of the Valley Center Road and Canyon Road intersection. Photo is facing northwest.

Views along Cole Grade Road to the Project Site



Photo 18 – Valley Center RV & Outside Storage west of Cole Grade Road. Photo is facing west.



Photo 19 – Cole Grade Storage on the southeast side of Cole Grade Road. Fencing along Joe’s Paving Company, Inc. on the northeast side of Cole Grade Road. Photo is facing southeast.



Photo 20 – Construction storage area south of Cole Grade Road (right). Photo is facing east.

Views of Eucalyptus Fields East of the Project Site

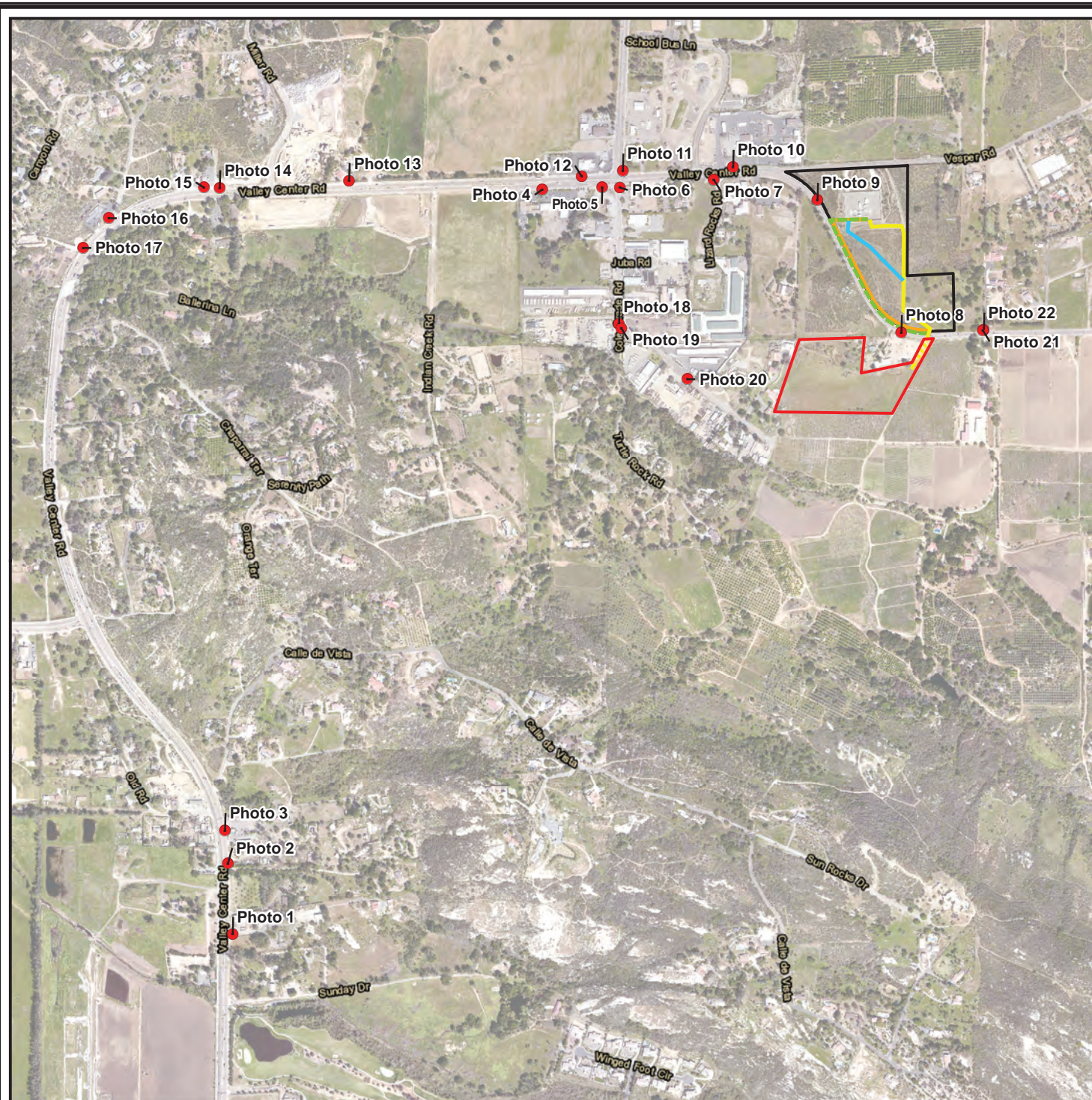


Photo 21 –
Eucalyptus fields
before trimming.
Photo taken on
March 10, 2020
facing southwest
from Valley Center
Road.

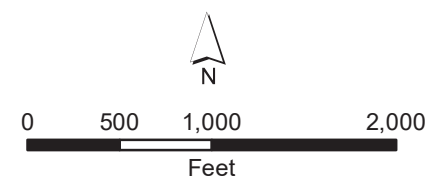


Photo 22 –
Eucalyptus fields
after trimming.
Photo taken on April
22, 2020 facing
southwest from
Valley Center Road.

Figure 1
Valley Center Storage Project
Character Photos



- Photo Locaitons
- Project Site
- SDG&E Property Boundary
- ▨ Private Access Easement
- Preliminary Underground 69kV Alignment**
 - Option A
 - Option B
 - Option C
 - Option D



Attachment D – Public Documentation

Valley Center Community Planning Group

Approved Minutes for a Virtual Zoom meeting held on **June 8, 2020** at 7:00 p.m.

Delores Chavez Harmes, **Chair**; Kevin Smith, **Vice-Chair**; James Garritson, **Secretary**

A=Absent; Ab=Abstention; DRB=Valley Center Design Review Board; N=Nay; P=Present; R=Recused; VCCPG=Valley Center Community Planning Group; VCPRD=Valley Center Parks & Recreation District; Y=Yea

A. Join Zoom Meeting:

<https://us02web.zoom.us/j/81545352838?pwd=T0xFUmRiQjBTZXVYT00xNGovZUFsQT09>; Meeting ID: 815 4535 2838; Password: VCCPG-June

B. Roll Call

- Meeting was called to order at **7:04 p.m.** and a Quorum was established with **14 members present. Mr. Del Pilar***, the 15th Member of the Group arrived at **7:24 p.m.**

- | | | |
|--------------------------|--------------------------|-----------------------|
| ● Lisa Adams - P | ● | ● |
| ● Jeana Boulos - P | ● James Garritson - P | ● Kathleen McCabe - P |
| ● William Del Pilar - P* | ● Delores ChavezHarmes-P | ● LaVonne Norwood - P |
| ● Susan Fajardo - P | ● Steve Hutchison - P | ● James Radden - P |
| ● Julia Feliciano - P | ● Joey Martinez - P | ● Kevin Smith - P |
| | ● Matt Matthews - P | ● Renee Wolf - P |

Guests

- | | | |
|--|--------------------------------|-------------------------------------|
| ● David Ross - Valley RoadRunner | ● Debra Jockinson | ● Emmet Aquino - County Parks & Rec |
| ● Kerry Garza - Touchstone Communities | ● Eric Jockinson | ● MikeWagner |
| ● Pam Wiedenkiller - VC Trails & VC Parks & Rec. | ● Mark Turner | ● Patricia Borchman |
| ● Sean Oberbauer - County Land Use/Environmental Planner | ● Ashley Smith - County | ● Peter Ricciardo |
| ● Peter Ricciardo - Chief of Development | ● Fredrick Wollman - VC Trails | ● Mark Jackson |
| ● Renee Meyst | ● Kristina Donica | ● Will Rogers |
| | ● Amy Fuller | ● Iphone participant |
| | ● Regina Ochoa - County | ● 605331484 participant |
| | ● Corinne Lytle | ● User Maggie participant |
| | ● Chris Brown | ● Laury Floryment |

C. Pledge of Allegiance - Chair Harmes

D. Approval of Minutes

1. **Motion: To approve the March 9, 2020 Minutes.**
 - a. **Maker/Second: Boulos/Norwood**
 - b. **Motion Carries 14-0-0 (Y-N-Ab).**
2. **Motion: To approve the April 13, 2020 Minutes.**
 - a. **Maker/Second: Norwood/Radden**
 - b. **Motion Carries 13-0-1 (Y-N-Ab). Mr. Smith abstained, as he did not attend this meeting.**
3. **Motion: To approve the May 11, 2020 Minutes.**
 - a. **Maker/Second: Smith/Wolf**

- b. Motion Carries 12-0-2 (Y-N-Ab). Ms. Boulos and Mr. Smith abstained, as they did not attend the meeting.**

E. Public Communication/Open Forum

- Chair Harmes provided a brief overview about using the Zoom features during the meeting tonight. She also asked the public to limit their time to one minute.
- Eric Jockinsen (guest) shared that the plans do not show any type of equine facilities. He is not against the proposed project, but the ten homeowners with houses above the proposed site have concerns about possible flies and odors if horses are housed at the facility. Chair Harmes had technical problems using Zoom and Mr. Smith took over the meeting during this time. Ms. McCabe wanted to share information about the project, but temporary Chair Smith requested that the Planning Group and guests either jump to Action Item 8 or go through the original order of the Action Items.
- There was no further public communication.

F. Action items (VCCPG advisory vote may be taken on the following items)

1) Rite-Aid ABC Lighting (Harmes): Discussion/Update – PDS2020-ENFGEN-000136 – Contact made with Rite Aid Corp, VP of Construction Robert Palmer. Advised they are out of compliance with VC DRB signage/lighting requirements. Copy of DRB signage guidelines sent to Mr. Palmer. Rite Aid will be rebranding 2,400 stores nationwide. Palmer confirmed compliance with lighting requirements when VC store signage is replaced. Of note is that the developer, Halferty Development, is responsible for circumventing the Planning Group. Rite Aid was not directly involved with the permitting and building process.

- Temporary Chair Smith suggested that the Planning Group move on to another action item until Chair Harmes was able to fix her technical problems.
- Sean Oberbauer, Land Use/Environmental Planner, shared background about the current status of this compliance issue.
- Ms. Feliciano wanted to make sure that Rite Aid is informed about this issue.
- Chair Harmes assumed leadership of the meeting again at 7:23 p.m. She has contacted Robert Palmer and he was not aware of any concerns that the Planning Group had about signage lighting requirements. Halferty Development did not follow the County guidelines. It will take between 3-4 weeks for this property to receive new digitized plans.
- Chevron (Action Item 2) will also need to make changes to their current lighting signage. Arco (Action Item 7) will need to revise some of their signage plans to meet DRB requirements.
- Chair Harmes stated that all businesses and projects must follow and meet the same guidelines.

2) Chevron Gas Station Lighting (Harmes): Informational/Discussion – Requested signage requirements from County on special lighting exceptions for gas stations. Similar scenario as Rite Aid. The 2003 site plan for United Oil listed monument lighting only with no signage on interior or canopy. The 2019 plan submission for minor deviation requests to change to Chevron did not indicate internal illumination signage on permit request. County has requested building plans to review if internal illumination is indicated anywhere on the

plans. County has informed us plans are with an off-site company for digitizing; it probably takes 3-4 weeks before the electronic version comes back.

- Chair Harmes stated that all businesses and projects must follow and meet the same guidelines.

3) Liberty Bell Plaza (Del Pilar): Informational - PDS2017-STP-17-037 CEQA determination to adopt 15183 Findings was heard at the County of San Diego Zoning Administrator on May 21, 2020. Approved.

- A brief informational statement was made about this action item.

4) Easement Vacation (Norwood): Discussion – VAC2019-0014-A-B-C – County submits to vacate pedestrian & equestrian easements for maintenance; drainage and access easements to flood control district and flowage easement. Trails and pedestrian easement are not part of the County Master Trails plan. The San Diego County Flood Control District has determined that the drainage and access easements are also excess to their needs because the facilities to be constructed within them will be relocated or eliminated and privately maintained by the HOA. Flowage easement is also no longer needed by the District because a new CLOMR Map was processed with FEMA and when the grading is complete and the LOMR is approved flowage easement will be obsolete as there will be a new FEMA 100 Year floodplain established. County would not be required to maintain trails. Responsibility would go to HOA development. Trails Association expressed concern apx. 8 miles of trails would not be accessible by the public. Actual trail area is apx. 1-2 miles. Additionally, the County determines whether the roads and trails will be public or private. Park Circle roads and trails are private, with the exception of Park Circle Way and adjacent trails which access the public park. The public park is easily accessed by public streets and public trails. This prevents County taxpayers from increasing taxes and from the liability of maintenance costs for private streets and trails. They are owned and maintained by the Park Circle HOA. Although the majority of the trails are on private property, there will be no gates that would prevent the public from access. A public trail surrounds the public park in the Park Circle community with access from Mirar De Valle Road and Valley Center Road. Orchard Run project was first approved 1998 with Site plans and final maps approved in 2006 & 2010. In June 2019 the County PDS approved and recorded site plans and specified that no site plan or design or land use changes can be requested by the DRB or the PG.

(Vote) [Appendix]

- Ms. Norwood shared that the County was offered the easement for this less than one mile of trails, but the County requested to vacate it, for the developer.
- Emmet Aquino (County official) shared that the County has not yet made an official recommendation about this easement vacation. Emmet will share Planning Group and community responses with SD County Parks and Recreation.
- Kerry Garza from Touchstone Communities shared a brief overview of this project. Orchard Run was approved in 1998. The former owner did offer some trail easements to the County. Mr. Garza shared a map of the proposed trails within the community. He shared that the County rejected some private trail easements because they do not provide connectivity. Chair Harmes commented that the trail easements are shown in orange.

- Mr. Smith shared that the community is concerned that they will lose access to these trails. Kerry shared that the County will not accept these trails because they are in excess of the Trails Master Plan for public dedication and therefore they are private trails.
- Mr. Hutchison shared his concerns that once the HOA takes control of these trails, the public will lose access to them. Mr. Garza shared that the trails within the community will remain private. Mr. Garritson commented that from previous meetings he understood that the public would have access to both the park and trails. Ms. Boulos shared that nothing has changed from the original plans. Chair Harmes stated that she had reviewed prior minutes and site plans for Park Circle.
- Mr. Garza stated that the trails will be privately built and maintained. The trails are not gated and the HOA will maintain them. Mr. Smith asked Kerry a few questions about the trail system. If the County does not accept the easements, it is easier for the builder to take over these sections of property to clean up the title. Ms. Boulos shared that the County has rejected the private trail easements. Mr. Hutchison asked if there was a way for the community to guarantee public access to these private trails. Kerry stated that these are private trails on private property. Part of the trails are public and will always remain public property. Mr. Garritson asked if the sidewalks within the community are public or private. Kerry shared that most newer developments do have private roads and sidewalks.
- Ms. Feliciano asked Emmet to clarify the County position about these private trails. Emmet and the County Parks management is still gathering information.
- Fredrick Wollman (guest and Chair of the Trails Association) shared that a promise of public access is a promise. He believes that the HOA might have the ability to guarantee access to these private trails.
- Laury Flory (guest) thought that these trails would remain public and as soon as the HOA is given control of these private trails, they will close public access to them.
- Pam Wiedenkiller (guest, member of the Trails Assoc. & Board Member of VCP&R) shared a Touchstone map and wanted Kerry to explain how there are 8 miles of trails. She wanted Touchstone to provide more details about the trail network.
- Ms. Boulos wanted to know how the offer of easement is recorded. Kerry agreed that there is some confusion about this. She asked if there was a way for the HOA to guarantee public access to these trails by including a declaration in the title of each property owner. Kerry stated that this is not an option because of numerous liabilities.
- Kerry shared that one of the trails (possibly 6A) will connect to the Daley Ranch.
- Frederick Wollman (guest) is working with the City of Escondido to provide access into Daley Ranch from Valley Center.
- **Motion: To separate this vote into two votes. Motion #2 is to accept the vacation of the drainage & access easement and flowage easement.**
- **Maker/Second: Norwood/Feliciano**
- **Motion Carries 15-0-0 (Y-N-Ab)**
- **Motion: To accept the vacation of the drainage and flowage easements.**
- **Maker/Second: Norwood/Feliciano**
- **Motion Carries 15-0-0 (Y-N-Ab)**

- **Motion: To accept the vacation of the drainage and flowage easements.**
- **Maker/Second:** Norwood/Feliciano
- **Motion Carries 14-0-1 (Y-N-Ab) Ms. Fajardo abstained from the vote because she had limited ability to hear and understand the official motion.**

5) Valley Center Storage (initially presented as Terra Gen Lithium Battery Storage) (Matthews): Informational/Discussion – PDS2020-STP-20-011 Application submitted to County April 30th. Valley Center ESS, LLC (Developer) plans to construct, own and operate the Valley Center Storage Project, a lithium-ion based battery energy storage facility capable of delivering up to 140 megawatts (MW) for approximately 4 hours on an 8.93-acre parcel and associated utility and access easement in Valley Center, San Diego County (the Project). The Project will interconnect to the existing, adjacent San Diego Gas & Electric (SDG&E) 69kV Valley Center Substation via an approximately 0.3-mile underground generation tie line (gen- tie line). The Project will be comprised of sets of four battery enclosures (each enclosure approximately 31.6 feet long by 5.7 feet wide by 8.6 feet high) that will house the integrated Battery Energy Storage System (BESS) including battery cells, modules, racks, a fully integrated fire and safety systems, HVAC systems, and other electrical systems. The batteries will be charged from the CAISO (California Independent System Operator) grid via the Project's interconnection to the SDG&E Valley Center Substation. Energy stored in the Project will then be discharged back into the grid when the energy is needed, providing essential electricity reliability services to the local area. This project has not been presented before Valley Center DRB. [Appendix]

- Mark Turner shared information about Terra Gen and the proposed project. Terra Gen is a company that brings a great amount of expertise to lithium-ion based battery energy storage facilities. The company serves a number of tech companies that like contracting with them to include in their energy portfolios. It is likely that there are three major customers that this project will service, with SDG&E becoming the largest customer. Terra Gen is a San Diego County company and does make an effort to become part of the community by providing lighting to some organizations and local scholarships. Battery storage will provide renewable energy to the Valley Center community and is an essential part of the power grid. This project is another step to have a zero carbon future in the State of California. Mark stated that the power facility might reduce power outages because current technologies cause SDG&E to shut off power when there are risks from Santa Ana winds and fire. The nine-acre property is located just off of Valley Center Road and is near Vesper Road. It is located in the industrial zone of Valley Center. Energy is stored in enclosed structures. The development has proposed a vinyl fence in front of the project. Chair Harmes shared images of the project as Mark Turner provided details about the proposed facility.
- Mr. Turner stated that a number of older facilities are now retired by energy companies. Terra Gen began considering Valley Center as a location for a substation back in 2015. The project could be completed by early 2021. The project location is in an industrial zone and will provide taxes to the County. Mark shared a number of possible benefits that the project will provide the Valley Center community. Batteries are less expensive than gas generators.

- Dr. Matthews asked Mark Turner a number of questions about the project. He shared that over twenty of these battery projects have caught fire in the last four years. Dr. Matthews has spoken with the fire marshall about the experience Arizona had with these battery systems and wanted to know how Terra Gen will provide additional safety features in the design of this project.
- Mark Turner shared that the modules are automatically shut off if there is a thermal runaway. Each enclosure is made of fire-resistant steel and has its own HVAC system. Each enclosure has its own system to control excessive heat.
- Dr. Matthews shared that he understands that using water for fire suppression is dangerous. He has concerns of dangerous fumes reaching a daycare that is located only 1200 feet from the project. There are also neighbors that surround this proposed site. Dr. Matthews asked for further details about how much noise the project will generate. He also wanted to know how Keys Creek, which is located next to the property, is protected from toxic waste. In the unlikely event that this happens, Mark Turner shared that there are a number of safety protocols and that Terra Gen is responsible for any damages.
- Dr. Matthews also asked about defensible space and how the project addresses potential dangers such as the intake vents on the HVAC systems. In the event of a fire at the battery storage facility, each enclosure is automatically shut down. The project is monitored 24/7 by both wired and wireless communication. The fire protection plan includes a fire hydrant at the site. A fire station is located less than a half mile from the site.
- Mr. Del Pilar did not agree with some of the statements made by Mark Turner . He does not believe SDG&E will reduce energy rates. He also does not see any benefit the project will provide to the Valley Center community.
- Mark Turner will send a digital map to Mr. Del Pilar to better show that battery storage facilities are spread throughout the County. Chair Harmes shared that the community of Fallbrook did vote to approve a battery storage facility, but now regrets this decision. Dr. Matthews asked another question about what happens when lithium-ion batteries are decommissioned.
- Mark shared that the project will dispose and recycle all materials when that time comes. Dr. Matthews had questions about the ownership of the property. Terra Gen owns the property, according to Mark Turner. Mark stated that he will share further information about the ownership of the property privately with Chair Harmes and Dr. Matthews.
- Mr. Garritson commented that he did see a benefit of the project if sections of the power grid are not shut down because of Santa Ana wind and fire warnings.
- Dr. Matthews and Mr. Del Pilar shared that there is no guarantee that the power grid will become more reliable if this project is built.
- Ms. Adams asked if there is a maintenance plan and a remediation plan for when the project is no longer in use. Mr. Turner indicated that these concerns are part of the permit.

6) Special Event Ordinance SEC. 72.249.5 (Harmes): Update - Traffic Engineering is bringing an updated Special Event program to the County based on feedback and input to the planned update through workshops, emails, and community group meetings. Highlights for

communities and event organizers as follows: c) Submittal Deadlines: 30 day submittal deadline for events that can self-certify there will be no environmental impacts via the environmental questionnaire. d) Signed Plans: previously approved plans can continue to be used (grandfather clause) without requiring a new stamp from an engineer. e) Event Promotion: we will not impose any limitation of event promotion timing. f) Trained Staff: we will not require that each event staff require traffic control training; just one supervisory member of the event team. g) Costs: We will present the analysis of staff costs to the Board of Supervisors for final decision on fees and funding for applicants.

- Chair Harmes shared information about this program. No comments were made about this program.

7) Arco (DelPilar): Informational – PDS2015-STP-15-012 – DRB signage requirements sent to Dan Goalwin, architect for Arco.

- Chair Harmes stated that all businesses and projects must follow and meet the same guidelines.

8) Clark Site Plan/Dental & Vet Offices-VC Professionals (McCabe): Discussion - PDS2020-STP-20-008 - Proposed building 7,572 sf veterinary clinic and a 3,140sf new dental office on a 2.52acre parcel with existing split zoning (C36 commercial and Rr residential). The new veterinary and dental offices will be located at the rear of the C36 Zone, where the Vet clinic will observe a 0' setback. This allows for optimal views out of the site, the ability to separate parking for each location, and a generous area to be used as a landscaped buffer from Valley Center Road. Long term stormwater BM P's have been incorporated into the project's design. The design theme of the buildings and the layout of the site are in keeping with the goals and objectives of the Valley Center Community Plan for commercial development. The offices will be served by a single driveway that leads to dedicated parking for each building. Community questions/concerns: a. Why bright white and black roofs when all the surrounding buildings are on earth tones and tile roofs? b. Concern of faux turf dog run (11 on site map) being positioned alongside of the office windows of the adjacent building (housing CofC etc.) Dr. Clarke is aware and will address changing the plan to move it away from the buildings to alleviate any possible odor pollution c. Will Rogers said property was included in a former south area traffic study. Should this be readdressed given traffic increases and new developments going in now?

- Ms. McCabe shared a brief report about this proposed building. She compiled these questions:
 - a. Why bright white and black roofs when all the surrounding buildings are on earth tones and tile roofs? She was told that this was to match the roof colors of a historical building.
 - b. Concern of faux turf dog run (11 on site map) being positioned alongside of the office windows of the adjacent building (housing CofC etc.) Dr. Clarke is aware and will address changing the plan to move it away from the buildings to alleviate any possible odor pollution
 - c. Will Rogers said property was included in a former south area traffic study. Should this be readdressed given traffic increases and new developments going in now?
- Ms. McCabe did address a concern that Eric Jockinsen (guest) and his neighbors had about potential fly problems if an equine facility is built below their properties. There are no plans for equine facilities and only a dog run is proposed.

9) Lilac Hills Ranch (Hutchinson): Update - Planning Commission will consider forming an ad hoc subcommittee for the Lilac Hills Ranch project and for County staff to provide an overview of the fire safety determination for the project. The hearing on this item is limited to consideration of this issue. BOS hearing June 12 th , 2020. Documents for the June 12, 2020 Planning Commission hearing are available:

<https://www.sandiegocounty.gov/content/sdc/pds/PC/200612-pc-hearing.html>

- **Motion: To extend the meeting until 10:30 p.m. if necessary tonight.**
- **Maker/Second:** Hutchison/Garritson
- **Motion Carries 14-1-0 (Y-N-Ab) Ms. Adams voted nay.**
- Mr. Hutchison shared that the County fire authority has identified a number of fire safety concerns about this project.

- **Motion: To add Mr. Hutchison in addition to Chair Harmes as representatives of the VCCPG.**
- **Maker/Second:** Hutchison/Feliciano
- **Motion Carries 14-1-0 (Y-N-Ab) Mr. Del Pilar voted nay.**
- Mark Jackson (guest) shared some of his concerns related to increased fire risk if the project is built.
- Mr. Smith wanted more clarification about the official position of the Planning Group.

10. Rabbit Run (Martinez): Information – PDS2020-TM-5478TE Tentative Map Time Extension [Appendix]

- Mr. Martinez provided a brief overview about this project. Rabbit Run has already requested an extension from the County. Chair Harmes asked if a vote was necessary about this extension, but Mr. Martinez stated that the developers are already working with the County,

G. Subcommittee Reports

1) Community Plan Update (Steve Hutchinson, Chair)

2) Emergency Evacuation (Delores Chavez Harmes, Chair)

- Progress on Paradise Mtn & Canal Rd. Ridge Ranch back entry road accessible for emergency vehicles but not “Prius ready”.

3) Mobility (Lisa Adams, Chair)

- Radar certification of 45 mph along N. Lake Wohlford to SR76 is part of the TAC Agenda for the June 12, 2020 meeting.

4) Villages (William Del Pilar, Chair)

- Mr. Del Pilar was happy that some newer members are taking on assignments. He likes it when a member is assigned a project because information is brought back to all members of the Planning Group. Chair Harmes shared background about how she assigns projects and her thoughts about the function of subcommittees.

5) Parks & Rec (LaVonne Norwood, Chair)

6) Tribal Liaison (Jeana Boulos, Chair)

7) Nominations (Susan Fajardo, Chair)

8) Member Training (Delores Chavez Harmes, Chair)

- Name plates for new members are in. Odd numbered seats for planning group members will be expiring on January 4, 2021. ROV has advised there will be changes to the filing

process due to COVID-19. Once the process is finalized ROV will be sending more information to the Chairperson.

9) Website (Renee Wolf, Chair)

I. Adjournment

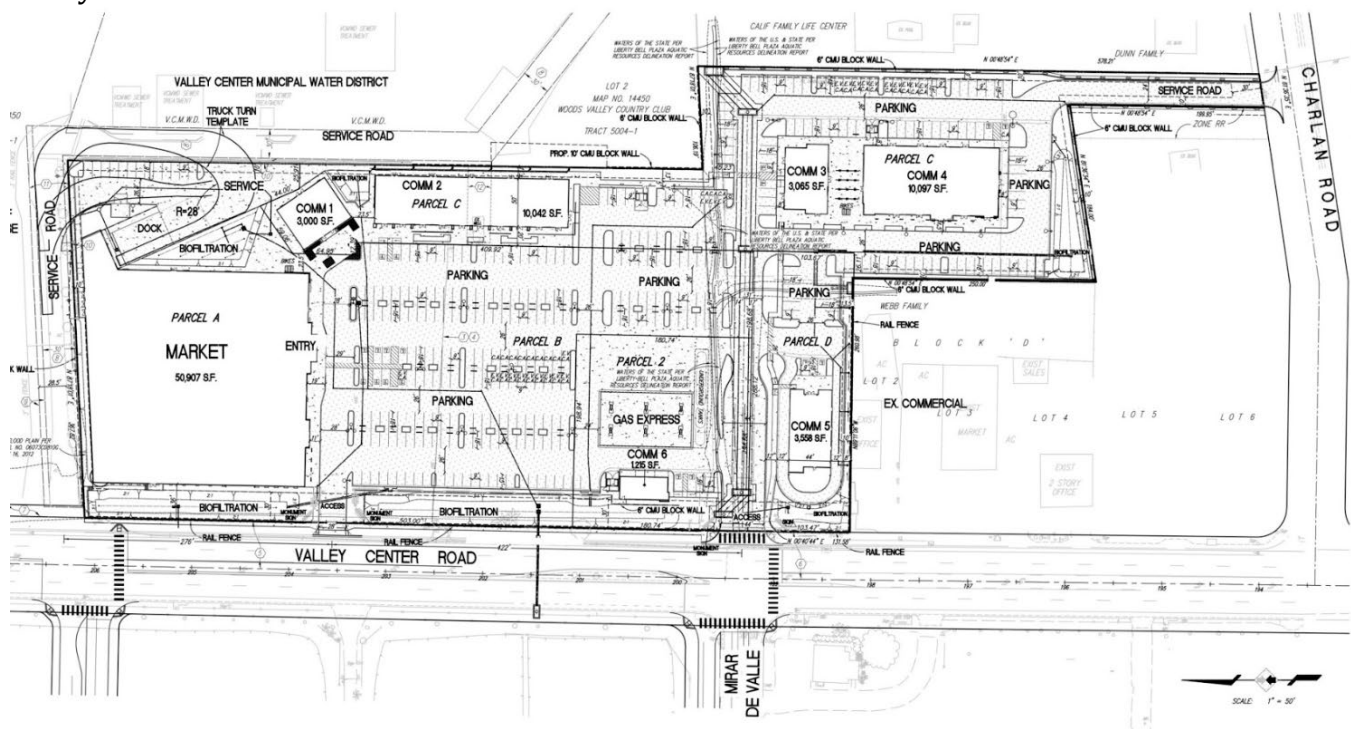
- Next regular meeting of VCCPG: **July 13, 2020 at 7 p.m.**
- The meeting adjourned at **10:14 p.m.**
- Minutes were approved on **July 13, 2020.**

James Garritson, Secretary

Appendix VCCPG June 8, 2020 Minutes

Liberty Bell Plaza Site Plan

Valley



: APN 189-091-30

Valley Center Trails Association Letter

May 28, 2020

Valley Center Community Planning Group
PO Box 127
Valley Center, CA 92082

RE: Easement vacation request for trails in Park Circle and Orchard Run

Dear Valley Center Community Planning Group Members,

The Park Circle/Orchard Run development includes a 3 acre public park and 8 miles of trails. These trails currently have Offers of Dedication (OD) to the County of San Diego for public Pedestrian and Equestrian Trails. The owners (Touchstone Communities) have requested that this Offer of Dedication be vacated. If this request is approved the Valley Center Community will have no guarantee that the public will have access to these trails.

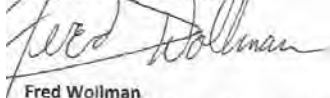
According to the attached April 17th letter from Tom McCabe, "the owner of these lands has purportedly agreed to continue to allow the public to use these trails once constructed, with no public maintenance responsibilities". In addition, the attached Park Circle promotional material highlights "8 miles of trails and pathways that link up to our neighborhood parks and the regional Heritage Trail", all of which are accessible to the public. Future HOAs can restrict public access if the easement is vacated.

The Valley Center Trails Association strongly recommends that the easement not be vacated until there is a guarantee that the public will have access to all 8 miles of trails in the Park Circle/Orchard Run development.

Public access to these trails is vital to link the new development to the community and necessary to maintain the character of Valley Center.

Thank you for your consideration.

Respectfully submitted,



Fred Woilman
President, Valley Center Trails Association

Valley Center Storage (initially presented as Terra Gen Lithium Battery Storage)





EXISTING CONDITIONS



PROPOSED CONDITIONS

VALLEY CENTER STORAGE PROJECT

PHOTO VIEWPOINT 1

DATE: 04/10/2020

TIME: 2:15 PM

DIRECTION: SOUTH - SOUTHWEST



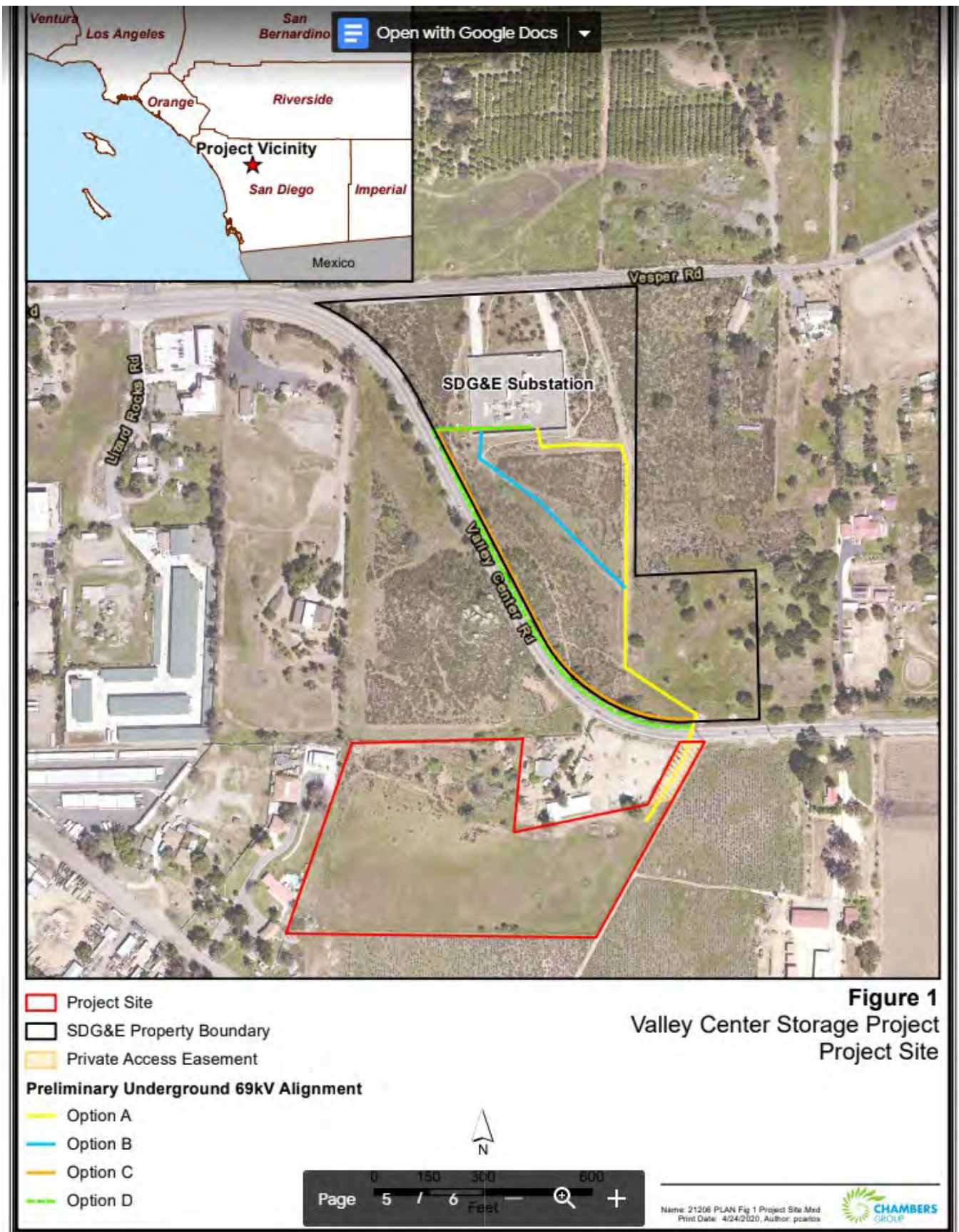
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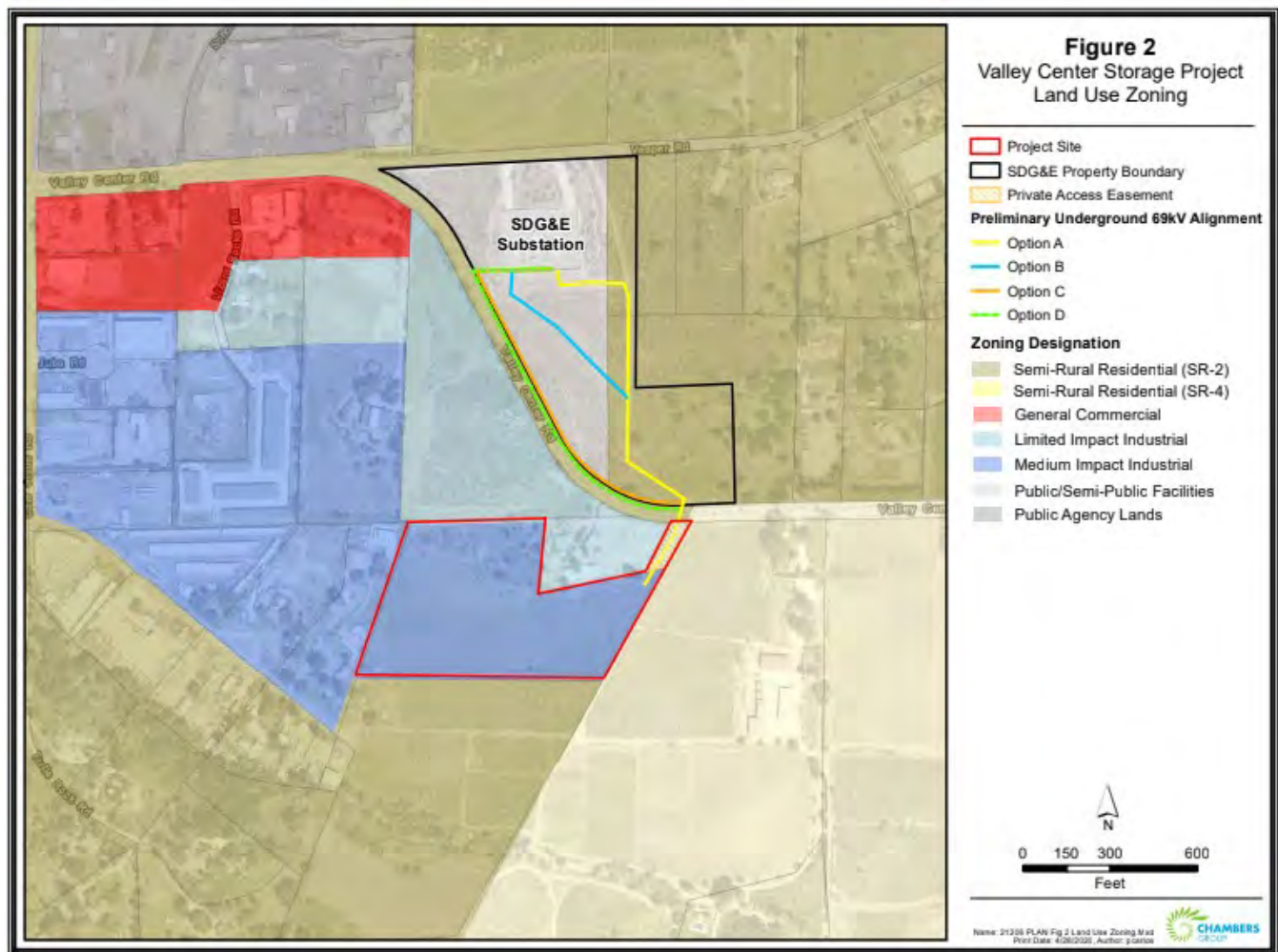
— PROPOSED FENCING

— PROJECT SITE BOUNDARY



VALLEY CENTER ESS, LLC







Valley Center Community Planning Group

Draft Minutes for a Virtual Zoom meeting held on **July 13, 2020** at 7:00 p.m.

Delores Chavez Harmes, **Chair**; Kevin Smith, **Vice-Chair**; James Garritson, **Secretary**

A=Absent; Ab=Abstention; DRB=Valley Center Design Review Board; N=Nay; P=Present; R=Recused; VCCPG=Valley Center Community Planning Group; VCPRD=Valley Center Parks & Recreation District; Y=Yea

A. Join Zoom Meeting: <https://us02web.zoom.us/j/89896528075?>, **Meeting ID:** 898 9652 8075
Password: VCCPG-July

B. Roll Call

- Meeting was called to order at **7:08 p.m.** and a Quorum was established with **15 members present**. Dr. Matthews joined the meeting at 7:26 p.m. Four members arrived at the virtual meeting after 7:30 p.m.
- Lisa Adams - **P**
- Jeana Boulos - **P***
- William Del Pilar - **P***
- Susan Fajardo - **P***
- Julia Feliciano - **P**
- James Garritson - **P**
- Delores ChavezHarmes-**P**
- Steve Hutchison - **P**
- Joey Martinez - **P***
- Matt Matthews - **P***
- Kathleen McCabe - **P**
- LaVonne Norwood - **P**
- James Radden - **P**
- Kevin Smith - **P**
- Renee Wolf - **P**

Guests

- David Ross - Valley RoadRunner
- Sean Oberbauer
- Amy Fuller
- Ashley Smith
- Cathy Baur
- Chris Brown
- Corinne Lytle Bonine
- Dori Ratray
- Fredrick Wollman
- Gary
- iPhone
- John
- Laury Flora
- Mark Turner
- Neil Kadakia
- Pankaj B.
- Pankaj Kadakia
- Regina Ochoa
- Sahil Desai
- Touchstone Communities
- Will Rogers
- AFuller
- MTurner iPhone 8x

C. Pledge of Allegiance - Chair Harmes

D. Approval of Minutes

1. **Motion: To approve the June 8, 2020 Minutes.**
 - a. **Maker/Second: Smith/Boulos**
 - b. **Motion Carries 10-0-0 (Y-N-Ab).**

E. Public Comments Members of the public may address the Planning Group on any topic not on the agenda.

- Cathy Baur asked to speak about the Valley Center Storage project during Action Item 4.

F. Action items (VCCPG advisory vote may be taken on the following items)

1) Lilac Hills Ranch (Hutchison): Update – Board of Supervisors voted down the project on June 24. Project can only move forward with only the originally approved 110 homes.

- Mr. Hutchison shared that the Supervisors voted down the project in a 4-1 vote based on the County Fire Authority recommendations. The applicant has worked ten years for project approval, but now must restart the entire project.

2) Arco (Harmes): Informational – PDS2015-STP-15-012 – New iterations received on proposed Arco signage.

- Chair Harmes is trying to prevent project delays by sharing detailed information with all developers. Sean Oberbauer (County) shared that the developer is now working closely with the CPG.

3) Valley Center Storage (initially presented as Terra Gen Battery Storage) (Matthews): Discussion – PDS2020-STP-20-011 Application submitted to County April 30 th . Valley Center ESS, LLC (Developer) plans to construct, own and operate the Valley Center Storage Project, a lithium-ion based battery energy storage facility capable of delivering up to 140 megawatts (MW) for approximately 4 hours on an 8.93-acre parcel and associated utility and access easement in Valley Center, San Diego County (the Project). The Project will interconnect to the existing, adjacent San Diego Gas & Electric (SDG&E) 69kV Valley Center Substation via an approximately 0.3-mile underground generation tie line (gen-tie line). The Project will be comprised of sets of four battery enclosures (each enclosure approximately 31.6 feet long by 5.7 feet wide by 8.6 feet high) that will house the integrated Battery Energy Storage System (BESS) including battery cells, modules, racks, a fully integrated fire and safety systems, HVAC systems, and other electrical systems. The batteries will be charged from the CAISO (California Independent System Operator) grid via the Project's interconnection to the SDG&E Valley Center Substation. Energy stored in the Project will then be discharged back into the grid when the energy is needed, providing essential electricity reliability services to the local area. This project has been presented to Valley Center DRB. (Vote)

- Mark Turner provided an update about the project and shared information that was requested by Dr. Matthews and Mr. Del Pilar. The DRB voted unanimously in favor of the project.
- Mark shared that this region of the County is in need of this type of project to prevent power outages due to fire and Santa Ana wind risks. From an environmental perspective, battery storage is necessary to create a zero-carbon future in California.
- Cathy Baur (participant) asked the Planning Group to vote against this project because of her concerns about a possible thermal runaway at the facility. Arizona and Hawaii are states that have had two fires occur at similar battery storage projects. Cathy said that a lithium-ion fire is very difficult to extinguish. She does not want the Valley Center community to risk a catastrophic fire occurring if this project is approved. She also said that South Korea has had numerous problems with preventing fires at lithium-ion battery storage plants.

- Dr. Matthews shared that a smaller private battery project was proposed on an adjacent property next to the SDG&E site. He believes that the scope of this project goes far above the needs of the Valley Center community.
- Mr. Del Pilar appreciated the information that Cathy Baur shared with the Planning Group. He believes we need to wait on voting for this project until we get further information from the fire department.
- Mr. Hutchison believes that the lithium-ion technology is not safe enough.
- John Corley (participant) wanted to know if this project will be voted upon tonight. He owns property adjacent to the SDG&E site and hopes this project is rejected. He now lives in Yuma, Arizona, but was born and raised in Valley Center. John does not believe this Valley Center Storage project will provide the same benefits for the community like the one that was proposed for his property. The proposed lease was for ten years with three additional 5 year lease renewals.
- Mark Turner shared that Terra Gen is based in Del Mar and although he lives in Northern California, the company is very close to Valley Center. Chief Davidson has frequent conversations with Mark Turner. Mark said that the risk if fire for this project is rated very low. The project will also provide regional benefits.
- Dr. Matthews shared that people in Fallbrook are complaining about the noise of their battery storage facility. Mr. Turner shared that Terra Gen will meet or beat any County noise guidelines. He also shared that the Fallbrook community would not know what their battery facility sounds like because it is not yet built.
- Amy Fuller (participant) shared that Chief Davidson has approved the fire district plan provided by Terra Gen. She shared that this documentation was already made public. Chair Harmes asked Mark Turner to explain why the Planning Group did not receive this important information before tonight's meeting.
- According to Mark, the battery storage facility will store 140 megawatts and a project of this size should provide a regional benefit.
- Mr. Del Pilar would like the Planning Group to wait another month to receive more information about potential fire risks from the fire district.
- Ms. Adams asked Ashley Smith about the official County position of the project. She shared that the project was approved by the fire protection district. The County is accepting public comments until August 10, 2020.
- Mr. Radden wanted to know further details about how to prevent a fire at this battery storage facility. Mark Turner said that there is a revised fire code that should prevent potential fires. Mr. Radden also would like a representative from SDG&E to share how this type of battery storage could benefit the Valley Center community.
- Mark Turned said that there are more potential customers than only SDG&E.
- **Motion: To approve the Valley Center Storage project.**
- **Maker/Second:** Smith/Adams
- **Motion Fails 3-11-1 (Y-N-Ab). Ms. Boulos abstained from the vote.**

- | | | |
|-------------------------|--------------------------|-----------------------|
| ● Lisa Adams - Y | ● | ● |
| ● Jeana Boulos - Ab | ● James Garritson - Y | ● Kathleen McCabe - N |
| ● William Del Pilar - N | ● Delores ChavezHarmes-N | ● LaVonne Norwood - N |
| ● Susan Fajardo - N | ● Steve Hutchison - N | ● James Radden - N |
| ● Julia Feliciano - N | ● Joey Martinez - N | ● Kevin Smith - N |
| | ● Matt Matthews - N | ● Renee Wolf - N |

4) Green Storage (Radden/Kadakia): Discussion - PDS2020-STP-03-026WI/PDS2020ER-03-08- 029A Discretionary Permit Application/Environmental Review CEQA. Lot merger and Greens Storage building expansion of adjacent business on south parcel. (Vote)

- Mr. Smith introduced Neil Kadakia and the Green Storage project. Neil shared details about the project. The project is solar powered. It is a modern project and will have no wood. It is built out of steel and concrete . It will have gooseneck signage. Additional project services include a dump station and propane filling station. Chair Harmes asked
- Mr. Smith shared information about a large retaining wall in the northwest corner near building #2. He wanted to know more information about the vines and landscaping that will hide much of the retaining wall. The vines will drape the entire retaining wall.
- Mr. Kadakia shared that the project cannot have much of a slope. It will sit on a 2 percent slope. Mr. Smith wanted further information about what a person will see on the backside of the building.
- Ms. McCabe asked about the maturity of the trees that the project will use. Mr. Kadakia said that the trees are in ten gallon containers at another project site and will take a few years to match more of the design shown on the project plans.
- All 5 members voted unanimously in favor of the project, but did want more detailed information about the retaining wall.
- Will Rogers (participant) shared his concerns about stormwater. Ms. Norwood asked about the traffic study. Neil explained that the project addresses any stormwater issues and a traffic study was completed.
- David Ross asked a question about the existing storage property and Neil shared that this is an extension of the project because people in Valley Center requested it.
- **Motion: To approve the Green Storage Project.**
- **Maker/Second:** Radden/Garritson
- **Motion Carries 15-0-0 (Y-N-Ab)**

- | | | |
|-------------------------|--------------------------|-----------------------|
| ● Lisa Adams - Y | ● | ● |
| ● Jeana Boulos - Y | ● James Garritson - Y | ● Kathleen McCabe - Y |
| ● William Del Pilar - Y | ● Delores ChavezHarmes-Y | ● LaVonne Norwood - Y |
| ● Susan Fajardo - Y | ● Steve Hutchison - Y | ● James Radden - Y |
| ● Julia Feliciano - Y | ● Joey Martinez - Y | ● Kevin Smith - Y |
| | ● Matt Matthews - Y | ● Renee Wolf - Y |

5) Easement Vacation (Norwood): Discussion – VAC2019-0014-A-B-C – County submits to vacate pedestrian & equestrian easements for maintenance; drainage and access

easements to flood control district and flowage easement. Vote to bi-furcate County Flood Control District and drainage and access easements as well as flowage easement was voted on and passed unanimously at VCCPG June 8 th meeting. Remaining trails easement is less than a mile and connects to nothing. Remaining easement was not intended as an equestrian trail, per San Diego County Parks & Rec official. (Vote)

- Emmet Aquino (County) shared that his department supports vacating these easements based on the plans that were approved. Ms. Norwood asked if the trails were ever open to the public. Emmet said that based on his review, the trails were always private. He said that the private loop is probably about a mile of trails.
- Kerry Garza (Touchstone Communities) shared that he is ready to move forward on the project.
- Chair Harmes said that the mile loop was never intended as an equestrian trail. The County was offered the easement, but rejected it. This section of trails was never intended for public usage.
- Mr. Hutchison asked why the County is requesting to vacate this easement if it never was intended for public use. Kerry Garza said that the easement was offered to the County a long time ago, but it was rejected.
- Chair Harmes read an email letter sent by Emmet Aquino (County). Based on documentation, the DPR recommends vacating the easements.
- There was discussion about the vacation between Ms. Norwood and Mr. Smith.
- Frederick Wollman (participant) shared that the County owns Keys Creek Preserve and he really would like the trails in Valley Center to connect. He would like all developments to include public trails that will connect to a master trail plan.
- Ms. Boulos said that the County does not want to maintain this easement.
- Laury Flora (participant) wanted to know if the HOA could allow public usage of the trails.
- **Motion: To vacate the easement VAC2019-0014-A-B-C.**
- **Maker/Second:** Norwood/Boulos
- **Motion Carries 12-3-0 (Y-N-Ab)**
- Lisa Adams - Y
- Jeana Boulos - Y
- William Del Pilar - Y
- Susan Fajardo - Y
- Julia Feliciano - Y
- James Garritson - Y
- Delores ChavezHarmes-Y
- Steve Hutchison - N
- Joey Martinez - Y
- Matt Matthews - N
- Kathleen McCabe - Y
- LaVonne Norwood - Y
- James Radden - Y
- Kevin Smith - Y
- Renee Wolf - N

G. Subcommittee Reports

1) Community Plan Update (Steve Hutchinson, Chair)

- Mr. Hutchinson shared that the subcommittee will probably not meet until September.

2) Emergency Evacuation (Delores Chavez Harmes, Chair)

- Red Cross is working on coordination with County Fire.

3) Mobility (Lisa Adams, Chair): Ridge Ranch Light - approved

- The Board of Supervisors voted to approve a traffic signal to be built where Valley Center Road and Ridge Ranch Road intersect.

- 4) Villages (William Del Pilar, Chair)
- 5) Parks & Rec (LaVonne Norwood, Chair)
- 6) Tribal Liaison (Jeana Boulos, Chair)
- 7) Nominations (Susan Fajardo, Chair)
- 8) Member Training (Delores Chavez Harmes, Chair)

a. Candidates must complete the candidacy documents. Documents will be available during the filing period – July 13 through August 7. You may request they be sent to you via email or mail or you may make an appt to pick them up. Documents cannot be sent to you by PDS. Completed candidacy documents need to be filed with the ROV. (They can be filed in-person by appt or by mail with a notarized declaration). Someone can pick up the candidacy documents for you if they have an appt and you complete the Authorization Form for Pick Up. Someone can file your candidacy documents for you if they have an appt and a notarized declaration. On the website provided in the email below, you can find a link to request your candidacy documents (it will be available soon) as well as the Authorization Form for Pick Up. You can contact the ROV with any questions or if you need clarification, by calling 858-505-7260 or emailing CandidateFiling@sdcounty.ca.gov.

b. Per County advisory - no physical meetings until further notice. c. 2021 Annual Training Update d. Hearing for Pauma Valley Potential Resident July 31. Public comments before July 14.

- Supervisor Desmond's office encouraged all concerned citizens in our area to send an email to Supervisor Desmond on or before July 27th in opposition of placing Bocklett in Pauma Valley, Valley Center area.

- 9) Website (Renee Wolf, Chair)

I. Adjournment

- Next regular meeting of VCCPG: **August 10, 2020 at 7 p.m.**
- **The meeting adjourned at 9:44 p.m.**
- **Minutes were approved on ...**

James Garritson, Secretary

From: [Delores Harmes](#)
To: [Smith, Ashley](#); [Ochoa, Regina](#)
Cc: [Mills, Benjamin](#); [Oberbauer, Sean](#); [Wardlaw, Mark](#)
Subject: Terra-Gen Lithium-Ion Battery Storage PDS2020-STP-02-011
Date: Thursday, July 30, 2020 3:02:54 PM
Attachments: [Terra Gen Opposition Letter.pdf](#)

Hello Ashley and Regina,
Please find attached a letter of opposition to the Terra-Gen Lithium-Ion Battery Storage project proposal for Valley Center. We are very alarmed and concerned at the prospect of this type of energy storage coming to Valley Center and located in the center of town where schools, parks and homes are nearby.
Please contact me if you have any questions. Thank you.

Delores Chavez Harmes - Chair

Valley Center Community Planning Group
(760)749-6555 off (619)318-8882 cell



Valley Center Community Planning Group

P.O. Box 127 Valley Center, CA 92082

(760) 749-6555

Delores Chavez Harmes, Chair

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July 30, 2020

Lisa Adams
Seat 13

lisa.adams.valleycenterca@gmail.com

Jeana Boulos
Seat 9

jeana.h.boulos@gmail.com

Delores Chavez Harmes
Chair
Seat 5

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Julia Feliciano
Seat 15

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Seat 7

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Renee Wolf
Seat 6

essentialaddictions3@gmail.com

Ashley Smith
Regina Ochoa
Planning & Development Services
5510 Overland Avenue #310
San Diego, CA 92123

Re: Valley Center Storage Project/Terra-Gen PDS2020-STP-02-011

Dear Ms's Smith and Ochoa,

On Monday, July 13, 2020 the Valley Center Community Planning Group voted not to approve the Valley Center Storage Lithium-ion Battery Storage project presented by Terra-Gen. The vote against this project was overwhelming with eleven board members voting against the project and only three voting in favor with one abstention. We strongly request County and staff not recommend this project for approval. There are many reasons for this, but the most important is public safety.

Placing this storage facility in Valley Center would create unacceptable risks to our community. One of these risks associated with lithium battery storage facilities is called thermal runaway. The systems are susceptible to rapid, uncontrolled overheating. It's a cycle of which excessive heat keeps creating more heat, and at high temperature gas builds up creating the potential for an explosion as well as the release of toxic gasses.

These explosions are not just theory but, unfortunately, have been a reality at numerous facilities. Just nine months ago there was an explosion and fire at an energy facility near Phoenix, Arizona that injured four fire fighters and four site personnel. This resulted in Arizona Public Service shutting down two other facilities. Inexperience did not play a role in this fire. Neither did any obvious technical malfunction. "Things worked the way they were intended to work; and we still had an event," said John Zahurancik COO of Fluence, the energy storage company who built the Arizona facility. A utility regulator with the Arizona Corporation Commission, Sandra Kennedy, warned that lithium-ion battery for energy storage are not prudent and create unacceptable risks. Scott Bordenkircher, director of technology innovation and integration at Arizona Public Service said "I don't think it's realistic for any of us to think that we're never going to have another lithium-ion battery failure."

The problem is not limited to Arizona. Hawaii and Vermont have had at least two fires of the same sort, and lithium-ion batteries have caused more than twenty storage complex battery fires in South Korea in the last three years alone. These battery fires are very intense and very difficult to control. They can take days or even weeks to extinguish properly and they can ignite or reignite days or often weeks after being extinguished.

Water on a lithium battery fire leads to the release of hydrogen fluoride which is highly flammable and toxic to humans. There is enormous concern that a toxic, poisonous cloud could result that would not only affect humans and animals but could also contaminate groundwater. During the intense heat and winds of a Santa Ana condition our communities would be subjected to potential devastation that would reach far beyond Valley Center, Bonsall and Pauma Valley.

Lithium-ion battery fires are also very hazardous to our firefighters and first responders. In addition to the immediate fire and electrical risks, they have close and intense exposure to toxic fumes, exposure to hazardous materials and building decontamination issues.

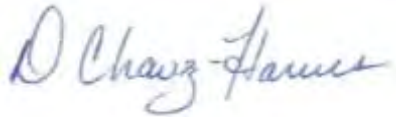
Although Valley Center Fire may have signed off on general fire safety for this project, direct conversations with our fire chief and fire marshal reveal there are reservations on this project's impact on safety for our community. Several members of the VCCPG, me included, have had direct conversations with our fire chief and fire marshal on this project and have been told they had still not completed a thorough analysis of the submitted plans.

Additionally, Chief Davidson indicated to us that Terra-Gen must show they are able to mitigate all the hazards of an international and adopted fire code. Whatever Terra-Gen plans to bring in to fight and prevent the spread of fire, Terra-Gen must purchase. And that is yet to be determined. How could this have been approved in April of 2020 when there is yet to be so much that has not been determined in regard to fire safety with this project? There seems to be a disconnect between our fire personnel and the county.

According to experts, energy storage is relatively early in its technologic maturation and incidents are to be expected. This is not what we want for Valley Center. Valley Center should not be a guinea pig for the county or state for an unmanned battery storage facility. The VCCPG strongly and emphatically does not want our community at risk for a potential explosion that would have disastrous ramifications. The risks and the potential for a catastrophic event if this project is allowed in Valley Center is real. And what reward would our community receive for this risk? None. That is why the VCCPG overwhelmingly voted against this project.

Valley Center is absorbing all the risk countywide and statewide for a project of this enormity. Battery storage is changing regularly and lithium-ion is not the only solution for energy storage. Our community has endured several years of devastation from organic fires. Please don't add another variable of fire to our already high fire danger community.

Respectfully,



Delores Chavez Harmes

Valley Center Community Planning Group Chair

Rincon Band of Luiseño Indians

CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov



July 28, 2020

Sent via email: Donna.Beddow@sdcounty.ca.gov

County of San Diego

Donna Beddow

Planning Division

5510 Overland Avenue, Suite 110

San Diego, CA 92123

Re: Valley Center Energy Storage Project

Dear Ms. Beddow,

This letter is written on behalf of the Rincon Band of Luiseño Indians ("Rincon Band" or "Band"), a federally recognized Indian Tribe and sovereign government. Thank you so much for consulting with us on the above mentioned project.

Thank you for your assistance to arrange a site visit with a representative of the Chambers Group. Per Cultural Resources Assessment, nine cultural resources have been identified within the Area of Potential Effects (APE). One of the resources will be impacted by the project. Long-term effects on the remaining eight resources cannot be determined at this time. The Band would like to review the geotechnical report and grading plans. In particular, we would like to have detailed information on the exact depths of the ground disturbances and information on the proposed drainage basins (earthen/lined/concrete).

A pedestrian survey was conducted by the Chambers Group between November 27, 2019 and June 2, 2020. It has been determined that P-37-0007596 will be impacted by the proposed project. Furthermore, one Shovel Test Pit (STP) within the APE returned positive, indicating that there is a high likelihood that further ground disturbance will unearth more cultural resources. As mentioned in our conversation on July 23, 2020, the Band would like to discuss further measures to protect the cultural resources within the APE.

The Band asks the County to assist with arranging for a call or virtual meeting between the developer, Chambers Group, Rincon and the County. If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 297-2635. Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager



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Local Union 569

San Diego and Imperial Counties



INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

4545 Viewridge Avenue, Suite 100 San Diego, CA 92123-5615 (858) 569-8900
2420 Imperial Business Park Drive Imperial, CA 92251-4004 (760) 355-3000

August 12, 2020

Darin Neufeld, Chief of Project Planning
County of San Diego
5510 Overland Avenue
San Diego, CA 92123
Email: Darin.Neufeld@sdcounty.ca.gov

Re: SUPPORT - Valley Center Battery Storage Project (Record ID Nos. PDS2020-STP-20-011 and PDS2020-ER-20-08-005)

Dear Mr. Neufeld:

On behalf of over 3,400 members of the International Brotherhood of Electrical Workers (IBEW) Local 569, we write in strong support of the Valley Center Battery Storage Project.

This project of up to 140 MW of energy storage will support grid reliability, assist the region in meeting California's climate goals and create quality local jobs with area wage standards and health insurance. It will also provide valuable electrical apprenticeship opportunities for women and men learning the electrical craft on their career path to becoming state-certified electricians. Local 569 has a robust apprenticeship outreach program that recruits applicants from across the County including local high schools, veteran organizations and community nonprofits.

IBEW 569 supports projects, such as the Valley Center Battery Storage Project, that provide good jobs and sustained viability and growth of California's energy storage industry which is essential to reducing harmful greenhouse gas emissions and achieving state and regional renewable energy requirements.

The construction of the Valley Center Battery Storage project will benefit San Diego County and the State of California and we urge the County to move this project forward.

Sincerely,

Jeremy Abrams
Business Manager/ Financial Secretary



County of San Diego, Planning & Development Services
Project Planning Division

MEMORANDUM

TO: File

FROM: Regina Ochoa, Project Manager

SUBJECT: Response to Comments; Valley Center Energy Storage Project
PDS2020-STP-20-011; PDSXXXX-HLP-XXX; PDS2020-ER-20-08-005

DATE: August 14, 2020

The following are staff's responses to comments received during the public disclosure period for the checklist prepared pursuant to the California Environmental Quality Act (CEQA) Section 15183 dated June 25, 2020, for the Valley Center Energy Storage Project (Project). The CEQA 15183 Checklist was circulated for public disclosure from June 25, 2020 through August 10, 2020, and 35 comments were received during that time.

Response to comments received from the San Diego County Archaeological Society, Inc. (June 30, 2020):

- A1. The comment states the San Diego County Archaeological Society agrees with the impact analysis and cultural resources mitigation measures as presented.

The County acknowledges and appreciates this comment. This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required.

Response to comments received from John Corley (August 3, 2020):

- B1. The commenter states that the Valley Center Energy Storage site on 29523 Valley Center Road is identified as vulnerable to flooding from the 1% annual chance flood (100-year floodplain) or Zone A and is therefore a special flood hazard area and is considered high risk. The commenter also states the parcel has a recognized on-site tributary that runs down the property into Keys Canyon Creek and quotes from the analysis of the 15183 Checklist, 10(e), which states the Project would be required to obtain a Conditional Letter of Map Revision (CLOMR) and a Letter of Map Revision (LOMR) as a Project condition of approval pursuant to FEMA.

The commenter is correct that the Registered Professional Engineer performing the floodplain modeling for the Project, Richard Lucera, concluded that a portion of the Project is located within the currently depicted Federal Emergency Management Agency (FEMA) and County of San Diego floodplain for Keys Canyon Creek and that portion would require a Letter of Map Revision (LOMR) to allow for revision to the



County of San Diego, Planning & Development Services
Project Planning Division

floodplain as currently mapped. To address this, the Project would be constructed in two phases: the first phase would be constructed in the portion of the Project site outside the currently depicted floodplain. The second phase would be constructed after FEMA has confirmed that the floodplain, as currently depicted, should be revised. No Project structures will be located within the revised, narrow, channelized floodplain and there would be no direct risk of exposing Project structures to flooding hazards.

A CLOMR is FEMA's opportunity to comment on a proposed project that would, after construction, affect the hydrologic or hydraulic characteristics of a stream or other flooding source and thus, result in the modification of the existing FEMA regulatory floodplain, floodway, the effective Base Flood Elevations (BFEs), and/or the Special Flood Hazard Area (SFHA). A CLOMR does not revise an effective Flood Insurance Rate Map (FIRM), rather it indicates whether the resulting floodplain from a project, if built as proposed, would result in a FIRM change. As discussed in the 15183 Checklist, the Developer will submit a CLOMR application and will receive a LOMR to the FIRM to FEMA once the Project has been constructed. For ease, this process is designated as "CLOMR/LOMR" throughout these responses to comments, except where a distinction is necessary.

As discussed in the 15183 Checklist and further described within Flood Plain Analysis, dated (as shown on the front cover directly below Mr. Lucera's stamp) April 21, 2020, the updated floodplain data resulting from the Project's modeling shows that the floodplain is actually a narrow isolated channel through the Project site, rather than the current large swath as depicted on FEMA's maps. No structures associated with the Project would be located within the revised, channelized floodplain. The Developer and the County are actively coordinating with FEMA and are compiling the necessary documentation for submittal to FEMA to complete the CLOMR/LOMR process. No changes were made to the 15183 Checklist as a result of this comment.

- B2. The commenter states within the CEQA Preliminary Drainage study by Westwood Professional Services, the study makes an assumption based on Kimley-Horn.

The commenter is correct that Westwood Professional Services assumed that a LOMR would be obtained by Kimley-Horn on behalf of the Developer to revise the FIRM covering the Project site, resulting in the conclusion that the Project battery enclosures would not be placed in the floodplain. As previously stated, the Developer and the County are actively coordinating with FEMA and are compiling updated hydrological data and associated documents for submittal to FEMA to fulfill the CLOMR/LOMR process. Once a LOMR is issued for the Project, the Project will be consistent with the requirements of FEMA's National Flood Insurance Program. No changes were made to the 15183 Checklist as a result of this comment.



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- B3. The commenter states the proposed battery energy storage site, as designed, should not be approved for a Site Plan permit by the Direction of Planning and Development Services due to the potential risk of flooding. The commenter further states that the Developer should be using the same criteria as San Diego Gas & Electric Company (SDG&E) when they chose their electric substation site in 2000.

Staff believes the Developer is using the same criteria used by SDG&E in 2000 during the siting for the Valley Center Substation. The Floodplain Analysis and 15183 Checklist produced for the Project acknowledges both the 100-year floodplain on a portion of the Project site, as well as the unnamed tributary (see Appendix F – Floodplain Maps in the Preliminary Floodplain Analysis). To the County's knowledge, SDG&E wrote their site selection procedures based on the understanding that going through FEMA's CLOMR/LOMR process to revise the floodplain could be costly and time intensive. The Developer here has decided to proceed with the LOMR process.

The sections highlighted from SDG&E's environmental analysis show that SDG&E planned to develop the underground transmission line and access road within the 100-year floodplain, but no above-ground structures would be placed within the floodplain. The Developer will be following this protocol through application for a LOMR to revise the floodplain to reflect actual floodplain conditions, which based on modeling, show only an isolated channel traveling through the Project site. With the proposed design, no Project structures would be located in a floodplain, and there would be no direct risk of exposing structures to flooding hazards. Project access roads would pass through the revised floodplain but, as indicated in the SDG&E environmental analysis, the access roads would not impede or redirect flood flows. Upon receipt of the LOMR, the Project would then be consistent with the requirements of FEMA's National Flood Insurance Program. No changes were made to the 15183 Checklist as a result of this comment.

- B4. This comment states that SDG&E "entertained the idea" of placing a "1MW" solar facility adjacent to the substation on Valley Center Road and that SDG&E acknowledged the 100-year floodplain and how they would have designed around it.

This comment echoes the previous comment (B3), emphasizing that the Project employ the design methodology that SDG&E utilized during the early stages of development of a proposed 1 megawatt (MW) solar facility. The documentation referenced within the comment indicates that SDG&E employed a combination of avoidance of the floodplain and designing the solar panels at a height to ensure that they would be 12 inches above the potential high-water level. In response, and as described above, extensive study and design has occurred over several years to design the Project as proposed. Specifically, and consistent with the commenter's recommendation, the Project will not place structures within the floodplain and, therefore, design recommendations similar to placing Project features at a height of at



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least 12 inches above the potential high-water level is not required. No changes were made to the 15183 Checklist as a result of this comment.

- B5. The commenter states that the Developer should have received a CLOMR/LOMR from FEMA during initial site preparation with the landowner.

In response, a LOMR cannot be obtained from FEMA until after a project is constructed and as-builts are submitted; therefore, it is not possible to obtain a LOMR during “initial site preparation with the landowner” like the comment suggests. Further, in order to submit a CLOMR application, exhaustive details about project design, including finalized site plans and extensive hydrological, geotechnical, and biological studies are required. Some of these studies require multiple days of field surveys that cannot be completed without legal authorization to be on the subject property. Additionally, prior to submittal of a CLOMR application, technical concurrence from the County must be obtained. In order to obtain technical concurrence from the County, submittal of the Site Plan, including Grading Plans and detailed modeling and design is required. As such, this stage of Project development is the appropriate timing for development of a CLOMR application and the County and the Developer are finalizing the CLOMR application for submittal to FEMA.

As mentioned in comments B1, B3, and B4, obtaining a CLOMR/LOMR would revise the currently depicted floodplain to reflect the updated modeled floodplain, which is an isolated channel traveling through the Project site. With these revisions, no Project structures would be placed in the floodplain and there would be no direct risk of exposing structures to flooding hazards. The Project is therefore consistent with the requirements of FEMA’s National Flood Insurance Program. No changes were made to the 15183 Checklist as a result of this comment.

Response to comments received from Aaron H. Reisner on behalf of Socalta (August 5, 2020):

- C1. The commenter states that the proposed battery storage Project will border property owned by Socalta and that Socalta is concerned about health and safety issues associated with a battery storage facility being in close proximity to their property, as well as the impact on economic value.

The County recognizes that the Project borders certain parcels owned by Socalta to the east and south in addition to commercial and industrial businesses the Project borders to the north and west. Consequently, the SoCalta property borders the industrially zoned Project site and the larger Valley Center commercial and industrial area of which the Project site is a part. Commercial and industrial businesses border the Project to the north and west including Joe’s Paving Company, Valley Center RV and Outside Storage, Cruise Party Rentals, Valley



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Center Self-Storage, Impact Auto #2, as well as utility services (SDG&E and Valley Center Municipal Water District). The Project is consistent with the visual character of the commercial/industrial businesses within this Valley Center commercial and industrial area. Specifically, the Project site is zoned General Impact Industrial (M54) which, under the County's Zoning Ordinance, allows for "unenclosed commercial and industrial operations having potential nuisance characteristics". In addition, the Project would construct a vinyl fence (with the appearance of a paneled wood fence) which provides screening for the Project. The Project also meets all the design standards of the Valley Center Design Guidelines, as unanimously determined by the Valley Center Design Review Board at their July 9, 2020 meeting.

A Hazard Consequences Analysis was prepared for the Project and reviewed by the County of San Diego, Valley Center Fire Protection District (VCFPD), and peer reviewed by Stantec Incorporated. The purpose of the Hazard Consequences Analysis is to inform and identify potential risks from the Project for operations staff and first responders and to implement appropriate Project safety design features and/or mitigation measures (if necessary). It was determined that no structures, day cares, or schools would be at risk from the Project due of distance. In addition, a Wildland Fire Protection Plan (FPP) was prepared for the Project and approved by the County of San Diego and the VCFPD. With implementation of the FPP, the Project would comply with the County regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. As a condition of approval, a Hazardous Materials Business Plan (HMBP) and an Operation Plan would also be required which includes an inventory of the site, an employee-training program and emergency response plan. The Operation plan would identify the necessary emergency response protocols with first responders, communications protocols, and ongoing training and communications for, with and between the VCFPD and the Project operations and maintenance staff in order to ensure safe and reliable operations.

Fire or thermal runaway events at battery storage facilities are very unlikely, particularly due to the required federal, California and local codes and standards that support the safe design, planning, and operations of battery energy storage systems (BESS). Pursuant to the Hazards Consequences Analysis, the Project's preventative measures and state-of-the-art fire and safety systems, described further below, make a thermal runaway event very rare. In addition, in the unlikely event of thermal runaway, the Project's preventative measures and systems are designed to limit the event to a single battery module as well as reduce the duration and intensity of an event if it occurs. The Project would also be required to meet all federal, state and local standards including the California Fire Code and the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems established in 2019 that requires rigorous equipment testing and establishes safety requirements for



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design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary BESS.

These energy storage installation standards are designed to prevent thermal runaway and minimize the risks of thermal runaway while establishing multiple levels of defense or safety to prevent the propagation of such an event. The first level of safety in the design is at the module level. At the module level, thermal barrier protections are installed between cells and modules to control heat propagation. Modules are independently controlled and monitored, so that, in the unlikely event the conditions of a battery unit during operations exceed safe operating conditions, that battery unit is shut down and isolated from the rest of the system in order to mitigate thermal runaway at the module level.

The second level of safety in Project design is the at the BESS enclosure and system level. Battery sub-modules, constructed of cells are located in modules or racks, with each rack equipped with thermal barriers for safety, and installed within integrated BESS enclosures. Each enclosure is fully equipped with integrated battery heat/fire and safety management systems, including electrical and mechanical controls and monitors, ventilation systems, HVAC, fire alarm detection and heat management systems, so that, in the unlikely of thermal runaway, it can be isolated and controlled at the rack and at the enclosure level.

The third level of safety in Project design is a the site level, where adequate separation between BESS enclosures, separation from other equipment and separation from neighboring receptors (residences, commercial operations, etc.) are integrated into Project design pursuant to the local fire code, the California Fire Code and NFPA 855 standards and guidelines. Additional local and California Fire Code standards require adequate setbacks from property lines, adequate fire apparatus (vehicle) access road design and other site design safety elements. No changes were made to the 15183 Checklist as a result of this comment.

- C2. This response addresses the commenters concerns regarding 1) the perception of possible health effects from electric or magnetic fields (EMF); 2) the potential noise and visual unattractiveness of the transmission line(s); 3) the proximity of existing improvements to the project facilities and any additional facilities that could be built within the foreseeable future; and 4) the potential interference with future land uses. Responses are provided below, corresponding by number to the above list:
- 1) The County is not aware of any scientifically credible information that EMF exposure is related to adverse health outcomes. In 1999 the US Federal Government completed a \$60 million research program managed by the National Institute of Environmental Health Services (NIEHS) and the Department of Energy to study electromagnetic fields (EMF) and extremely low frequency (ELF) fields. The NIEHS reported to the US



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Congress that the probability that ELF-EMF exposure as a health hazard is small and that virtually all laboratory evidence in animals and humans failed to support a causal relationship between exposure to ELF-EMF and changes in biological function or disease (NIESH 1999). The strength of a magnetic field also decreases dramatically with increasing distance from the source (NIEHS 2020). No changes were made to the 15183 Checklist as a result of this comment.

2) Visual simulations and a Noise Impact Analysis were produced for the Project and posted for public disclosure with the 15183 Checklist on June 25, 2020. As mentioned in the Project Description, an 8-foot tall vinyl (or similar material) fence with a Sound Transmission Class rating of 18 or greater will be installed between the Socalta property and the Project. The fence will ensure that the Project complies with the County's noise ordinance (see more detail on this point below) and will reduce visibility of the facility from the Socalta property. Additionally, the Project's transmission line (generation tie-line) will be installed underground and therefore will not be visible or audible.

The County recognizes that these Project features may be visible over the Project's fence from the Socalta property with the anticipated maximum structure height at approximately 26 feet, well under the maximum height limits allowed for a Project located within the General Impact Industrial (M54) zone. However, per the Visual Simulations produced for the Project and circulated for public disclosure June 25, 2020, the vinyl fence would predominantly screen the Project from public vantage points. In addition, the Project is zoned for industrial use and is bordered by commercial and industrial lots located to the north and west. The Project has been found to be consistent with the visual character of the surrounding area. Further, the General Impact Industrial (M54) zone under which the Project site is located allows for unenclosed commercial and industrial operations by right and without a use permit assuming the Project conforms to applicable design review standards. The Project meets all the design standards of the Valley Center Design Guidelines, as unanimously determined by the Valley Center Design Review Board at their July 9, 2020 meeting.

The County Zoning Ordinance and Noise Ordinance sets the one-hour average sound limit at the Project property line bordering the Socalta property as 57.5 A-weighted decibels (dBA). Pursuant to the modeling and calculations provided in the Noise Impact Analysis, the Project would meet the 57.5 dBA one-hour average sound limit required by the County Noise Ordinance with implementation of the Project design feature of an 8-foot vinyl (or similar material) fence with a Sound Transmission Class rating of 18 or greater. Therefore, the Project would not exceed applicable noise levels at the adjoining property lines. No changes were made to the 15183 Checklist as a result of this comment.

3) The Project site is located on a parcel zoned General Impact Industrial (M54) and



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designated within the County General Plan as Medium Impact Industrial (I-2). The Project falls under the land use category as a Minor Impact Utility, defined as public utilities which have a local impact on surrounding properties and are necessary to provide essential services. Minor Impact Utilities, such as the Project, are permitted uses within the M54 and I-2 use regulations; therefore, the Project is consistent with the County's intended uses for the property as permitted under the Zoning Ordinance and General Plan. In addition, the Project has reduced all Project-related impacts to a "less than significant" level in compliance with the County's standards and CEQA. The Developer does not foresee additional facilities being built on the Project site in the near future and neither the Developer nor the County can make assumptions about the future development of parcels in the vicinity. Any additional facilities proposed in the future would be subject to County review and to CEQA for compliance. No changes were made to the 15183 Checklist as a result of this comment.

4) The Project will not impermissibly interfere with future land uses on the parcel or surrounding area as the Project is considered a Medium Impact Utility and the parcel is zoned M54 and designated I-2, which makes the Project consistent with the County's intended uses for the site. No changes were made to the 15183 Checklist as a result of this comment.

- C3. CEQA requires an analysis of physical impacts to the environment; it does not require analysis of economic impacts. Under CEQA, "[a]n economic or social change by itself shall not be considered a significant effect on the environment" (CEQA Guidelines, Sections 15131 and 15382). Effects analyzed under CEQA must be related to a physical change (CEQA Guidelines, Section 15358[b]). Property value loss in and of itself is not a physical impact required to be included in a CEQA analysis. The Project's 15183 Checklist includes adequate analysis under CEQA for community services and population and housing including: Section 14, Population and Housing; Section 15, Public Services; Section 18, Utilities and Service Systems. The Project's 15183 Checklist also includes a thorough analysis regarding potential Project-related environmental impacts including: Section 1, Aesthetics; Section 3, Air Quality; Section 9, Hazards and Hazardous Materials; and Section 13, Noise.

In addition, projections about impacts of proposed development on values of adjacent properties are speculative. Valley Center is a unique sub-market within the County, and there is considerable disparity in the square footage of the homes, condition of the property, and associated acreage sold in this period. However, similar to other markets within the broader San Diego market, the sales price per square foot within the Valley Center area has continued to increase annually despite the construction of several energy projects in the area. Further, page 62 of the appraisal report submitted as part of this comment acknowledges that "There is no empirical evidence to support the appropriate discount or loss in economic value associated by being proximate to one of these battery storage facilities."



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Lastly, potential impacts on adjacent property values is not within the scope of the Director's authority to consider when determining whether to approve a Site Plan. Consistent with Zoning Code Section 7158(a), the scope of the Director's review of site plans is as follows: "Scope. The Director shall review and evaluate Site Plans for conformance with the Site Plan review standards and criteria set forth in the pertinent sections of The Zoning Ordinance, and his review and evaluation of the Site Plan shall not exceed the scope of said standards and criteria." For the reasons discussed within the 15183 Checklist, Ordinance Compliance Checklist, and reiterated here, the Project is in conformance with the Site Plan review standards and criteria. No changes were made to the 15183 Checklist as a result of this comment.

Response to comments received from John Corley (August 6, 2020):

- D1. The commenter states that the Valley Center Energy Storage facility would be classified as a critical facility in which higher regulatory standards and floodplain management plans would apply.

The Project, being a battery energy storage system, may be classified as a critical facility, confirmed by the transcript provided in Figure 1 and FEMA's Fact Sheet presented in Figure 2 of the comment letter. However, there is no regulatory standard set by FEMA or the County that eliminates the possibility for development within a special hazard flood zone (Zone A). Regardless, and as discussed in response to comments B1, B3, and B4, the Developer is seeking a CLOMR/LOMR that would revise the floodplain to reflect an isolated channel traveling through the Project site. With these map revisions, no structures associated with the Project would be placed in the floodplain and there would be no direct risk of exposing structures to flooding hazards.

The Developer and the County are actively coordinating with FEMA to prepare the submittal package for a CLOMR; nothing is currently in FEMA's files for the Project site because the application package has not yet been submitted. Upon completion of the CLOMR/LOMR process, the Project will proceed in compliance with the County's Grading Ordinance and Floodplain Damage Prevention Ordinance. No changes were made to the 15183 Checklist as a result of this comment.

- D2. The commenter states he communicated with the County of San Diego Flood Control who sent him the latest Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) that discusses critical facilities and the risk of potential hazards such as flood.

The purpose of the County's MJHMP is to enhance public awareness and understanding of hazards in the County; create a decision tool for County management; promote compliance with state and federal program requirements; provide a basis for local policies for hazard mitigation; provide inter-jurisdictional coordination of hazard



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mitigation programming; and achieve regulatory compliance to qualify for forms of federal aid. The MJHMP is not enforceable or codified. Regardless, the Project is consistent with MJHMP Goal 9. As discussed above, the Project, will not place structures within a floodplain and is neither in conflict with adopted policies to discourage growth in flood-prone areas nor would prevent the County from adopting further policies to do so. No changes were made to the 15183 Checklist as a result of this comment.

- D3. The commenter states FEMA and the County of San Diego's MJHMP have established standards and goals to discourage critical facilities from being locating in high risk flood hazard areas.

As discussed in response to comments B1 through B5, the CLOMR/LOMR process would revise the Project's FIRM to reflect the current floodplain according to updated modeling data, which shows that the actual floodplain is an isolated channel through the Project site. This revision reflects a greatly reduced flood risk to the Project site. The Developer will also comply with the County Floodplain Management Plan, Grading Ordinance, and Floodplain Damage Prevention Ordinance, particularly by placing structures outside of the floodplain, as revised. No changes were made to the 15183 Checklist as a result of this comment.

Response to comments received from Claire Collins (August 7, 2020):

- E1. The commenter states her opposition to the proposed Lithium-Ion Battery Storage for Valley Center. The commenter is concerned with the Project's placement within a high fire hazard area with a history of fires.

Please see response to comment C1.

Further, as stated in the Project's FPP, the overall wildland fire threat at the Project site is minimal. The Project would be conditioned to remove the dead/downed vegetation in order to establish a fuel modification zone. The Project would be setback 30 feet from the property boundary. This setback area would be cleared and maintained to eliminate potential fuel. The Project would reduce the risk of wildfire through the removal of dead and downed vegetation that, but for Project development, would serve as fuel for fires.

Pursuant to the FPP, the Project demonstrates compliance with all applicable Wildland Urban Interface fire codes. The FPP in combination with the VCFPD permit and inspection process, would ensure the applicable building codes are followed to construct the Project with ignition resistant materials, adequate fire/emergency ingress and egress, and fuel management as mentioned above.



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The Project would improve energy reliability, providing access to sustainable energy, preventing brown and blackouts in the area, and reducing the need for carbon-emitting generators during peak energy times. Further, events triggering a battery unit to exceed its safe operating temperature (potentially leading to fire) are caused either by faulty and/or improperly installed equipment, or improperly managed projects where the battery cells are allowed to operate outside of their safety zone. For further information on the safety features of the BESS, please see response C1. No changes were made to the 15183 Checklist as a result of this comment.

- E2. The commenter states the developer is overstepping the general plan and floodplain for capital gain at the expense and safety of residents.

As mentioned in response to comments (B1 through B5), the Developer is pursuing a CLOMR/LOMR. The CLOMR/LOMR process would revise the Project's Flood Insurance Rate Map to reflect a revised floodplain. According to updated modeling data, the floodplain is an isolated channel through the Project site instead of the wide swath as currently depicted on FEMA's FIRM. No Project structures would be located within the floodplain, as revised. This revision eliminates flood risk to the Project site to insignificant levels. The Developer will also comply with the County Floodplain Management Plan, Grading Ordinance, and Floodplain Damage Prevention Ordinance, particularly by placing structures at least one foot above the floodplain elevations. Compliance with these regulations will significantly reduce any potential risks associated with floodplains to surrounding properties. Further, and as described in the 15183 Checklist, the Project will comply with General Plan Update (GPU) Environmental Impact Report (EIR) as Mitigation Measure Hyd-6.1. In addition, the Project has been designed consistent with the GPU EIR Mitigation Measures Hyd-3.1 through Hyd-3.3 and Hyd-6.1. These measures require development to be located away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, maximize natural drainage and topography when conveying stormwater, comply with the Resource Protection Ordinance (RPO), as well as the Grading, Clearing, and Watercourses Ordinance. For these reasons, and as explained further within the 15183 Checklist, the Project is consistent with the General Plan. No changes were made to the 15183 Checklist as a result of this comment.

- E3. The commenter is concerned the harm the batteries would have on people and the economy. The commenter also states that all of "the facts" need to be laid out to the VCFPD and believes they have been misled. The commenter continues by stating the batteries can seep into the ground water and cause vapors and illnesses such as Cancer.

The VCFPD is the fire authority having jurisdiction over the Project. The Project applicant has been actively communicating with the VCFPD. The VCFPD has reviewed



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and approved the FPP, Hazard Consequences Analysis, and Site Plan prepared for the Project as part of the Project's 15183 Checklist CEQA review and Site Plan Review process. In addition, the VCFPD has been actively performing their own research to make informed decisions about the Project by seeking peer review with other fire authorities having jurisdiction for battery energy storage projects in other jurisdictions.

The potential for toxic vapors resulting from a thermal runaway event at the Project site has been analyzed in the Project's Hazards Consequences Analysis. The analysis determined that under the most conservative circumstances, toxic gases would travel up to 21 feet beyond the Project site boundary during a thermal runaway event (Haley & Aldrich 2020), which would not affect any offsite residences or structures. As required in the Fire Protection Plan, the Developer is actively working with the VCFPD to develop and implement a comprehensive Operations Plan that would appropriate emergency response protocols with first responders, communications protocols, and on-going training and communications for, with and between VCFPD and the Project operations and maintenance staff. Further, as required by the County, the Developer will prepare a HMBP and Spill Prevention Control and Countermeasure Plan that define how the Project will address any potential hazardous substance from entering the environment in the event of a spill or fire. No changes were made to the 15183 Checklist as a result of this comment.

- E4. The applicant states she does not believe the County understands that Valley Center is an organic, boutique, western community with ranches, 4H, rodeos and strives to be realistic about growth. The applicant asks the County representatives to be responsible and represent the interests of the people over revenue.

The Project site is located on a parcel zoned by the County as General Impact Industrial (M54) and designated within the County General Plan as Medium Impact Industrial (I-2). The Project falls under the land use category as a Minor Impact Utility, defined as public utilities which have a local impact on surrounding properties and are necessary to provide essential services. All Minor Impact Utilities, including the Project, are permitted uses within the M54 and I-2 use regulations; therefore, the Project is consistent with the County's intended uses for the property as established by the Zoning Ordinance and General Plan. Additionally, the Project is bordered by commercial and industrial lots located to the north and west and is therefore consistent with the visual character of the surrounding area. The Project would also be surrounded by a vinyl fence which would predominantly screen the Project from public vantage points as seen in the Visual Simulations produced for the Project and circulated for public disclosure June 25, 2020. The Project also meets all the design standards of the Valley Center Design Guidelines, as unanimously determined by the Valley Center Design Review Board at their July 9, 2020 meeting. No changes were made to the 15183 Checklist as a result of this comment.



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Response to comments received from Jason and Jennifer Boes:

- F1. The commenter does not appear to appreciate that the 15183 Checklist is not required for public disclosure and is concerned with the “determinations and statements” being stated in such “a matter of fact matter”. The commenter continues by suggesting her dislike in the word “sensitive receptors” instead of “people/humans with homes and health concerns”.

The County has prepared all reports in compliance with CEQA and the County’s Guidelines for Determining Significance and Report Format and Content Requirements for CEQA technical report preparation, including required formatting and terminology including language used in the public disclosure notice and the use of “sensitive receptors”. Specifically, Appendix G: Environmental Checklist Form of the CEQA Guidelines provides the basis for the 15183 Checklist analysis. The following language is included under the Evaluation of Environmental Impacts: “A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose *sensitive receptors* to pollutants, based on a project-specific screening analysis)” (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000– 15387). No changes were made to the 15183 Checklist as a result of this comment.

- F2. The commenter is concerned for the Project’s fire hazards to surrounding business, homes and schools, and states that Valley Center is a known area of serious wildfire concern. The commenter also states that Arizona recently experiences a serious fire situation from a BESS facility where firefighters were injured.

Please see the response to C1.

Additionally, The County and VCFPD have reviewed and approved the Project’s Hazards Consequences Analysis and FPP. In addition to these reviews, the Hazards Consequences Analysis also underwent an Independent Technical Review from a qualified professional, Stantec Incorporated. The result of this review is included within the report.

In the Arizona event referenced by the commenter, the facility either did not have proper fire and safety procedures in place with the local fire authority, or the proper procedures were in place; however, were not followed. Thus, after first responders arrived, the enclosure housing was opened without confirmation that the conditions inside the enclosure did not pose a threat of deflagration. The deflagration event was a direct result of that decision and four firefighters were injured. With a proper, comprehensive emergency response plan prepared in consultation with the VCFPD , training and implementation of the emergency response plan, the accident in Arizona could have been avoided. To ensure that this does not happen at the Project site, the Developers



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are required to implement the Project's comprehensive Operations Plan in consultation with VCFPD following local, federal, state, and local guidelines and requirements, including the newly established NFPA 855. The Operations Plan would appropriate emergency response protocols with first responders, communications protocols, and on-going training and communications for, with and between VCFPD and the Project operations and maintenance staff. Further, as required by the County, the Developer will prepare a HMBP which maintains an inventory of site and includes an employee-training program and emergency response plan.

Further, as stated in the Project's FPP, the Project would reduce the risk of wildfire through the removal of dead and downed vegetation that, but for Project development, would serve as fuel for fires. The Project also employs fire mitigation strategies such as County and VCFPD-approved setbacks from property boundaries, vegetation management within the Project development footprint, and inclusion of Vinyl fencing, which is a VCFPD-approved fire resistant material.

Pursuant to the FPP, the Project demonstrates compliance with all applicable Wildland Urban Interface fire codes. The FPP in combination with the VCFPD permit and inspection process, would ensure the applicable building codes are followed to construct the Project with ignition resistant materials, adequate fire/emergency ingress and egress, and fuel management as mentioned above. No changes were made to the 15183 Checklist as a result of this comment.

- F3. The commenter states the BESS facility would be an eyesore, and "out of place" among the rural homes, trees and vegetation.

The Project site is located on a parcel zoned by the County as General Impact Industrial (M54) and designated within the County General Plan as Medium Impact Industrial (I-2). The Project falls under the land use category as a Minor Impact Utility, defined as public utilities which have a local impact on surrounding properties and are necessary to provide essential services. All Minor Impact Utilities, including the Project, are permitted uses within the M54 and I-2 use regulations; therefore, the Project is consistent with the County's intended uses for the property as established by the Zoning Ordinance and General Plan. Additionally, the Project is bordered by commercial and industrial lots located to the north and west and is therefore consistent with the visual character of the surrounding area. The Project also meets all the design standards of the Valley Center Design Guidelines, as unanimously determined by the Valley Center Design Review Board at their July 9, 2020 meeting.

Additionally, and as described in the Project 15183 Checklist, public views of the Project are extremely limited. The analysis includes simulations from 2 viewpoints along Valley Center Road: eastbound and westbound. Because the Project is predominantly screened from public vantage points and is consistent with the visual



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character of the surrounding area, the Project would have a less-than-significant impact to the existing visual character or quality of public views of the Project site and its surroundings. Further, the Project site equipment and facilities (with the exception of stormwater drainage and retention basin) will be surrounded by a solid, 8-ft vinyl fence, which will aid in visual screening of the Project site from Valley Center Road and other surrounding viewpoints. In addition, the vinyl fence would be designed with the appearance of a paneled wood fence to not contrast with the surrounding visual setting. No changes were made to the 15183 Checklist as a result of this comment.

- F4. The commenter states the entrance to the Project site is located on a dangerous part of Valley Center Road between homes.

The Project has complied with County design standards related to transportation, including the provision of a Line of Sight Study, indicating that the Project exceeds necessary line of sight in both directions. As mentioned in the 15183 Checklist produced for the Project, construction and operation of the Project is anticipated to generate a limited number of vehicle trips; thus, the number of vehicles entering and exiting the Project site is not expected to increase traffic hazards along Valley Center Road. As mentioned by the commenter, the Project was sited in this location due to the proximity to the SDG&E Valley Center Substation. Siting a BESS facility close to an electrical load center reduces the risk of safety power outages, and decreases environmental impacts associated with transmission from the BESS facility to the connecting substation. The proposed use of the Project site is permitted "by right" due to zoning and land use designation. As mentioned above, Minor Impact Utilities such as the Project are permitted uses within M54 and I-2 use regulations. No changes were made to the 15183 Checklist as a result of this comment.

- F5. The commenter states this part of the scenic highway is part of a beautiful valley and one of the reasons the commenter moved to this part of Valley Center. In addition, the commenter is concerned with the proximity of the Project to the preschool, elementary school, and homes.

The 15183 Checklist addressed the fact that Valley Center Road is a County-designated scenic corridor and analyzed impacts using Visual Simulations of the Project from two Valley Center Road viewpoints. While traveling along Valley Center Road, the Project site is buffered by an existing commercial use for Cruise Party Rentals, as well as vegetation located directly north of the site along Valley Center Road. Further, the Project site equipment and facilities (with the exception of stormwater drainage and retention basin) will be surrounded by a solid, 8-ft vinyl fence, which will aid in visual screening of the Project site from Valley Center Road and other surrounding viewpoints. Moreover, the Project meets all the design standards of the Valley Center Design Guidelines, as unanimously determined by the Valley Center



County of San Diego, Planning & Development Services
Project Planning Division

Design Review Board at their July 9, 2020 meeting. No changes were made to the 15183 Checklist as a result of this comment.

- F6. The commenter questions why the Project is necessary for providing electricity for “50K homes” when there isn’t “that many homes in the whole town of Valley Center”. The commenter states concern for the urgency to build the project, would be an eyesore, and possibly dangerous.

The Project would not only be able to offer the community electricity for an increased number of homes, but would also improve energy reliability, provide access to sustainable energy, preventing brown and blackouts, and reducing the need for carbon-emitting generators during peak energy times.

Furthermore, the Project contributes to the achievement of County and State renewable energy goals. The County General Plan’s Conservation Element includes Goal COS-18: Sustainable Energy, which promotes energy systems that reduce consumption of non-renewable resources and reduce GHG and other air pollutant emissions while minimizing impacts to natural resources and communities. The Project aligns with policy COS-18.1: Alternate Energy Systems Design in particular. Policy COS-18.1 encourages the County to work with SDG&E and non-utility developers to facilitate the development of alternative energy systems that are located and designed to maintain the character of their setting (County 2011). No changes were made to the 15183 Checklist as a result of this comment.

Response to comments received from Janna McGee:

- G1. The commenter states her opposition to the battery storage Project being sited in her community in Valley Center.

The County acknowledges this comment. No changes were made to 15183 Checklist as a result of this comment.

Response to comments received from Katrina Pierce-Ubben:

- H1. The commenter states the Valley Center Community Planning Group voted to not approve the Valley Center Storage Lithium-ion Battery Storage Project presented by Terra-Gen. The commenter strongly suggests the County not recommend the Project for approval due to many reasons, but mainly for public safety. The commenter is concerned of the batteries overheating and thermal runaway.

Please see the response to C1 and F2. No changes were made to 15183 Checklist as a result of this comment.



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- H2. The commenter is concerned for a fire to occur at the facility resulting in a toxic, poisonous gas cloud effecting, humans, animals, and would be toxic to firefighters and first responders.

Please see the response to E3. No changes were made to 15183 Checklist as a result of this comment.

- H3. The commenter is concerned that VCFPD have not signed off the plans and additional review is required. The commenter states she has had direct conversations with the fire chief and fire marshal who have revealed “there are reservations on this project’s impact on safety for our community.

The VCFPD has been actively working with the Developer on this Project. VCFPD reviewed the Hazardous Consequence Analysis and FPP prepared for the Project. The VCFPD was also consulted to ensure compliance with local and state fire standards, and their recommendations were integrated into the Project Site Plan (fire access roads, set-backs, fire hydrants, fencing, removal of dead/downed vegetation, landscaping, etc.). There is no disconnect between the Developer, the County, and VCFPD. While the VCFPD has reviewed the Hazard Consequences Analysis and FPP, the VCFPD and Developer will have ongoing coordination through preparation and implementation of an Operations Plan inclusive of an emergency response plan and training for firefighters. The Operation plan would identify the necessary emergency response protocols with first responders, communication protocols, and ongoing training and communications for, with and between the VCFPD and the Project operations and maintenance staff in order to ensure safe and reliable operations. No changes were made to 15183 Checklist as a result of this comment.

- H4. The commenter states she “strongly and emphatically” does not want out community at risk for a potential explosion that would have disastrous ramifications”. The commenter continues by stating the community has endured several years of devastation from organic fires.

As mentioned in response to comment H1 above, the County has reviewed the Project’s Hazards Consequences Analysis and FPP. Fire or thermal runaway events at battery storage facilities are very unlikely, particularly due to the required federal, California and local standards that support the safe design, planning, and operations of BESS facilities. The Project will be required to meet all federal, state and local standards including the California Fire Code and the 855 Standard for the Installation of Stationary Energy Storage Systems established in 2019 that requires rigorous equipment testing and establishes safety requirements for design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary BESS. No changes were made to 15183 Checklist as a result of this comment.



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Response to comments received from Nita Stuckwish:

- I1. See summary and responses for H1 through H4 above, as this letter is resubmittal of the comment letter received from Katrina Pierce-Ubben.

Response to comments received from Kevin Smith:

- J1. The commenter states he is a resident of Valley Center and does not object to a lithium-ion battery storage Project being placed within the community. The commenter further states his understanding of the local fire district reaching an agreement to plan for, document, and train fire fighters on how to deal with problems that may arise. The commenter states the process is in its early stages, he feels it would be too soon to approve the Project since the type of technology has not been specified yet.

The Project is following the County's decision-making process for Site Plan review, which does not require selection and disclosure of a technology manufacturer prior to approval of the Site Plan. The Developer will select a manufacturer that complies with all federal, state and local standards including the California Fire Code and the NFPA 855 Standard for the Installation of Stationary Energy Storage Systems established in 2019 that requires rigorous equipment testing and establishes safety requirements for design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary BESS. For the reasons discussed within the 15183 Checklist, Ordinance Compliance Checklist, and reiterated here, the Project is in conformance with the Site Plan review standards and criteria.

Additionally, there are several points at which the County and VCFPD will have authority to review and approve final design, including the ultimate BESS manufacturer. These include approval of the Operations Plan and issuance of a building permit. The Site Plan and 15183 Checklist have been prepared to address the range of potential manufacturers. No changes were made to 15183 Checklist as a result of this comment.

Response to comments received from John Corley (August 10, 2020):

- K1. This comment compares the details of the Valley Center Energy Storage Project to those of the AES Fallbrook 40 MW Battery Energy Storage System Project according to a personal opinion.

No substantive comment on the adequacy of the environmental analysis was made. Therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required.



County of San Diego, Planning & Development Services
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- K2. The commenter states the “two similar concepts in unincorporated communities of Fallbrook and Valley Center with very different agendas.” The commenter believes Terra-Gen is trying to receive “a Return on Investment” by siting as many battery storage containers as possible.

It could be noted that, one difference the commenter does not include is that while the AES Fallbrook 40 MW Battery Energy Storage System required a Minor Use Permit to construction and operate, the Valley Center Energy Storage Project is a “by right” permitted use and consistent with the M54 and I-2 use regulations. Further, effects analyzed under CEQA must be related to a physical change in the environment (CEQA Guidelines, Section 15358[b]). No changes were made to 15183 Checklist as a result of this comment.

Response to comments received from Glynna Hoekstra:

- L1. The commenter states how unclear it is from the letter that was provided to her by a neighbor whether this Project is subject to “an environmental impact review, or any variances from CEQA.”

The County and the Developer have performed all public noticing and meetings in compliance with Section 15183 of CEQA and the County’s noticing requirements. California Public Resources Code section 21083.3 and CEQA Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. The complete discussion of this exemption under CEQA can be found within the Project’s 15183 Checklist.

The 15183 Checklist produced for the Project supports that the Project does not introduce any Project-specific significant impacts and that no additional density above and beyond that established in the General Plan is proposed. The Project site is designated as Medium Impact Industrial (I-2) by the County General Plan and M54 by the County Zoning Ordinance. These use regulations allow for unenclosed commercial and industrial operations such as construction, sales, and services. The Project would fall under the land use category as a Minor Impact Utility, defined as public utilities which have a local impact on surrounding properties and are necessary to provide essential services. All Minor Impact Utilities, including the Project, are permitted uses within the M54 and I-2 use regulations. Because the Project is a “by right” permitted use and consistent with the M54 and I-2 use regulations, it is consistent with the development density established by the General Plan and the certified GPU EIR. The Project is also consistent with the land use designations in the Valley Center Community Plan which are Public/Semi-Public Facilities or Public/Semi-Public Lands.



County of San Diego, Planning & Development Services
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Thus, the Project is eligible for an exemption from additional environmental review and a 45-day public disclosure period was deemed appropriate by the County. No changes were made to 15183 Checklist as a result of this comment.

- L2. The commenter states she has major concerns for the Project including fire safety and mobility on “one of our major thoroughfares”.

Please see the responses to C1, E1, F2, and H1.

Additionally, the Project is in compliance with County design standards related to transportation, including the provision of a Line of Sight Study, indicating that the Project exceeds necessary line of sight in both directions along Valley Center Road. As mentioned in the 15183 Checklist completed for the Project, construction and operation of the Project is anticipated to generate a limited number of vehicle trips; thus, the number of vehicles entering and exiting the Project site is not expected to increase traffic hazards along Valley Center Road. In addition, the Project was sited in this location due to the proximity to the SDG&E Valley Center Substation. Siting a BESS facility close to an electrical load center reduces the risk of safety power outages, and decreases environmental impacts associated with transmission from the BESS facility to the connecting substation. In addition, the proposed use is permitted “by right” per County zoning and land use designation for the Project site. As mentioned above, Minor Impact Utilities such as the Project are permitted uses within M54 and I-2 use regulations.

Lastly, the Project is consistent with the County’s intended uses for the property as permitted under the Zoning Ordinance and 2011 General Plan Update. The Developer analyzed and has or will mitigate all environmental Project-related impacts to a “less than significant” level in compliance with the County’s standards and the standards of CEQA. Commercial and industrial businesses border the Project to the north and west including Joe’s Paving Company, Valley Center RV and Outside Storage, Cruise Party Rentals, Valley Center Self-Storage, Impact Auto #2, as well as utility services (SDG&E and Valley Center Municipal Water District). The Project site is part of a larger Valley Center commercial and industrial area and is consistent with the visual character of the commercial/industrial business in that surrounding area. No changes were made to 15183 Checklist as a result of this comment.

- L3. The commenter asks for additional public review and input for the Project.

The County and the Developer have performed all public noticing and meetings in compliance with Section 15183 of CEQA and the County’s noticing requirements. Additionally, the Developer performed outreach in the community to get coverage of the Project long before the Project was agenized during meetings of the Valley Center Design Review Board on June 9, 2020 and the Valley Center Community Planning



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Group (VCCPG) on June 8, 2020 and July 13, 2020. On March 9, 2020, the Developer made an informal presentation of the Project to the VCCPG and an article was published in the local newspaper, the Valley Center Road Runner, on March 12, 2020 giving a brief overview of the Project. Additionally, the Valley Center Road Runner advertised the formal meeting with the VCCPG, providing access information to virtually attend the meeting, on July 9, 2020. Extensive details regarding the Project and potential environmental impacts resulting from the Project are provided in the publicly available 15183 Checklist produced for the Project. In addition, pursuant to the County Zoning Ordinance Procedures, a Zoning Administrator Hearing will be held where additional comments may be heard before an official vote is casted. The notices for the Zoning Administrator Hearing will be send out by email 10 days in advance of the hearing. No changes were made to 15183 Checklist as a result of this comment.

References:

Electric & Magnetic Fields. National Institute of Environmental Health Services. Updated May 14, 2020. Accessed online: <https://www.niehs.nih.gov/health/topics/agents/emf/>

Floodplain Management Plan. County of San Diego (County). August 2007. Accessed online: <https://www.sandiegocounty.gov/dpw/floodcontrol/floodcontrolpdf/floodplainmanagementplan.pdf>

NIEHS Report on Health Effects from Exposure to Power-Line Frequency Electric and Magnetic Fields.

National Institute of Environmental Health Services. May 4, 1999. Accessed online: https://www.niehs.nih.gov/health/assets/docs_p_z/report_powerline_electric_mg_predates_508.pdf

San Diego County General Plan. County of San Diego (County). August 3, 2011. Accessed online: <https://www.sandiegocounty.gov/content/sdc/pds/generalplan.html>



San Diego County Archaeological Society, Inc.

Environmental Review Committee

30 June 2020

To: Ms. Regina Ochoa
Department of Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, California 92123

Subject: Intent to Adopt Findings Pursuant to CEQA Section 15183
Valley Center Energy Storage
PDS2020-STP-20-011, PDS2020-ER-20-08-005

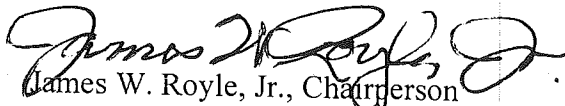
Dear Ms. Ochoa:

I have reviewed the documents for the subject project posted on the PDS website on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the project checklist and cultural resources report, we are in agreement with the impact analysis and cultural resources mitigation measures as presented.

Thank you for the opportunity to review and offer our comments on this project's environmental documents.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Chambers Group, San Diego
SDCAS President
File

John J. Corley
 14535 Vesper Road (Property)
 Valley Center, CA 92082
 jyelroc1@gmail.com

August 3, 2020

Regina Ochoa, Project Manager
 County of San Diego Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123-1239
 regina.ochoa@sdcounty.ca.gov

SUBJECT: VALLEY CENTER ENERGY STORAGE, PDS2020-STP-20-011, PDS2020-ER-20-08-005, PDSXXXX-HLP-XXX,

Dear Ms. Ochoa,

The proposed Valley Center Energy Storage site on 29523 Valley Center Road is identified as vulnerable to flooding from the 1% annual chance flood (100-year floodplain) or Zone A. This designation means it would be in a special flood hazard area (SFHA) and considered high risk. FEMA statistics used in the Flood Insurance Study (FIS) shows that a 100-year flood zone gives you a 26% chance of being flooded over the course of a 30-year mortgage to put that in perspective. The 8.9-acre parcel has a recognized on-site tributary that runs down the property into Keys Canyon Creek 500 feet to the south of the Project at its closest point.

Comment: *Floodplain Analysis for this Project was prepared by Kimley-Horn. Engineer Richard Lucera (no date on stamp or signature on report), came to this conclusion on the 15183 Checklist? See below.*

15183 Exemption Checklist

Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is gently sloped to the south with all water flowing into the adjacent Keys Canyon Creek. Keys Canyon Creek flows approximately 500 feet to the south of the Project site at its closest point. Floodplain delineation and mapping for Keys Canyon Creek were completed by the Federal Emergency Management Agency (FEMA) and the County of San Diego Flood Control. The creek has been mapped through the eastern portion of the Project site. However, the Project site is subject to concentrated flows that originate along Valley Center Road which discharge through an existing culvert along the westbound lane of Valley Center Road to the north of the Project site. According to the duplicative analysis performed for the Floodplain Analysis, the floodplain associated with the Keys Canyon Creek flows through the site, but in an isolated channel versus the previously predicted swath. Due to the above information, the Project would be required to obtain a Conditional Letter of Map Revision (CLOMR) and a Letter of Map Revision (LOMR) as a Project condition of approval pursuant to FEMA to ensure no impacts would occur. This condition was identified by the GPU EIR as Mitigation Measure Hyd-6.1.

Comment: CEQA Preliminary Drainage study for this Project was conducted by Westwood Professional Services. On page 8 of their report, they make assumptions based on Kimley-Horn. See below.

CEQA Preliminary Drainage Study | Valley Center Storage Project

June 5, 2020

Existing Conditions and Drainage

Existing Site Conditions

Historically the site has been used a pasture area based on both landcover data and imagery data. The topographic elevation used in this analysis is from publically available 2015 San Diego Region QL2 Lidar. These contours can be seen on Exhibit 2 & 3.

Based on the United States Department of Agriculture soil survey for the project area the onsite soils are classified mostly as Hydrologic Soils Group (HSG) A with a small amount of HSG C. Both the A and C soils area classified as a sandy loam. Additionally onsite Geotechnical work has verified the onsite soils. Based on onsite infiltration testing the A soils have an infiltration rate of 2.40 inches per hour. This infiltration rate was taken into account in both the basin sizing and the County's BMP sizing Spreadsheet V3.0. The typically recommend value is 0.30 in the spreadsheet and this value was used to determine the required BMP storage for the 85th percentile storm along with the required water quality volume. The BMP is assumed to be unlined to allow infiltration in the basin.

According to both FEMA and Regional WMAA data a portion of the site is located with a FEMA Zone A. The site is undergoing a study for a LOMR through another consultant to remove the site from the flood zone. All assumptions in this study assume the site is removed from the flood zone and removes the risk of offsite flooding. No housing is proposed on the project so no housing will be placed in a flood zone. Additionally no structures will be placed in the new delineation of the flood zone so no impediment or redirection of the flows will occur.

Comment: ***The proposed battery energy storage site, as designed, should not be approved for a Site Plan permit by the Director of Planning and Development Services due to the potential risk of flooding.*** The developer Terra-Gen should be using the same criteria as San Diego Gas & Electric Company (SDG&E) when they chose their electric substation site in 2000. SDG&E documents provided in this letter not only shows their acknowledgment of the 100-year floodplain on the southern portion of their parcel north of Valley Center Road. But SDG&E also recognized an unnamed drainage to Key Canyon Creek on the south side of Valley Center Road which would be a portion of Terra-Gen's proposed site.

DRAFT
MITIGATION NEGATIVE DECLARATION

SAN DIEGO GAS & ELECTRIC COMPANY
VALLEY CENTER SUBSTATION PROJECT
Application No. 99-09016

Lead Agency:

CALIFORNIA PUBLIC UTILITIES COMMISSION

505 Van Ness Avenue
San Francisco, CA 94102
Tel: (415) 703-1729
Contact: Beth Shipley

Prepared by:



605 Third Street

Encinitas, CA 92024
Tel.: (760) 942-5147

JANUARY 2000

Comment B-3
continued

APPENDIX B

SITE SELECTION

1998 SDG&E Site Selection Study

San Diego Gas & Electric (SDG&E) began a site selection study in October 1998 that consisted of fifteen potential sites for a proposed electric substation in the community of Valley Center. These fifteen candidate sites were selected from site visits, review of the Community Plan, existing land use, zoning, and hydrological research. A number of field visits by SDG&E's project team of engineers, planners, and designers were conducted, as well as a comprehensive decision analysis to determine feasible sites. Five of the fifteen sites were determined to be not feasible for substation construction due to lack of access, floodplains, acreage constraints, and land use incompatibilities.

In November 1998, SDG&E representatives presented a progress report of the site selection study to the Valley Center Community Planning Group. SDG&E requested a subcommittee of the planning Board be appointed to assist in the site selection study. The Chair of the Board nominated four people, two Planning Board members, and two Valley Center residents as the subcommittee members, which were unanimously approved.

A decision analysis, using a Kepner Trego (K.T.) formula, was performed on the ten remaining sites (see Figure B-1), which resulted in a ranking of those sites. Kepner Trego is a formula used to rank sites using factors applicable to the project. The process begins by identifying what the site 'must' have to be a feasible site. Secondly, the project team identifies the factors they 'want' the site to have. Thirdly, the 'musts' and 'wants' are ranked in order of importance. Lastly, the numbers are totaled and ranked using the highest total for the most favorable site. For the subject project, six 'musts' and eleven 'wants' were identified. They included:

Musts

- ! One-Mile Radius From Load Center
- ! Not Subject to Flooding
- ! Safe Vehicular Access
- ! Minimum Size of 1.65 - 2 acres
- ! Geotechnically Suitable
- ! Transmission and Distribution Access

Wants

- ! Fairly Level
- ! Land Use Compatibility (current & future)



1233-03

January 2000

SDG&E Valley Center Substation Project

B-1

Comment B-3
continued

Section 5.0

Discussion of Environmental Impacts

change the existing water drainage flow in the area and would not result in flooding on or offsite (see response 5.8-c).

- e) *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

Less than Significant Impact. See response 5.8-a, 5.8-b and 5.8-c.

- f) *Would the project otherwise degrade water quality?*

Less than Significant Impact. See response 5.8-a. No other degradation of water quality would result from project implementation.

- g) *Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary of Flood Insurance Rate Map or other flood hazard delineation map?*

No Impact. No housing is proposed by the project.

- h) *Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

Less than Significant Impact. The southeastern corner of the project site is within the 100-year floodplain of an unnamed drainage to Keys Creek which primarily flows on the south side of Valley Center Road (County of San Diego 1990b). Portions of the proposed underground transmission line and access road would be within the limits of the 100-year floodplain. The access road would be at the existing grade. Consequently, neither the underground transmission line nor the access road would impede or redirect flood flows.

- i) *Would the project 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?*

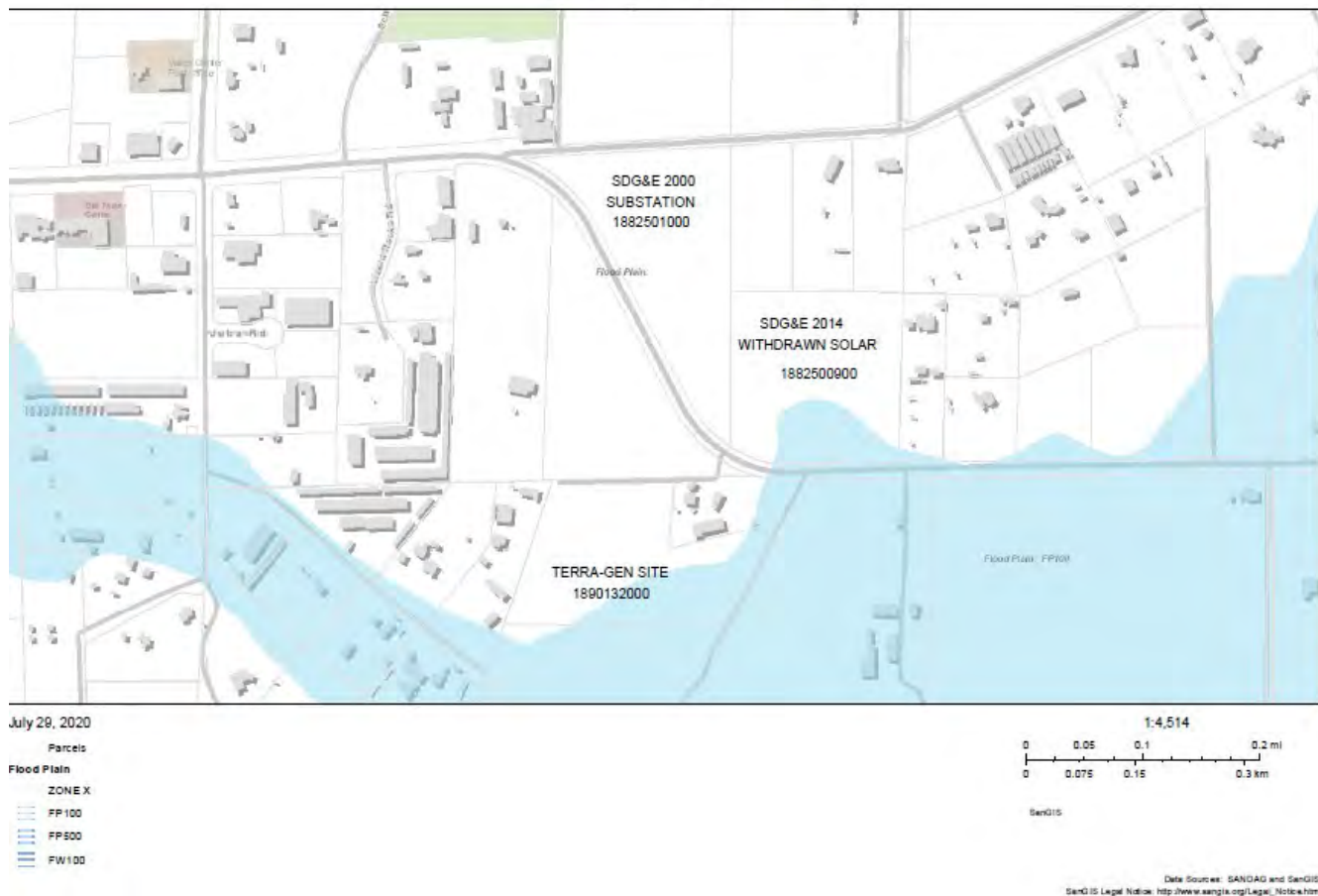
Less than Significant Impact. See response 5.8-h. All above-ground structures would be placed outside of the 100-year floodplain and therefore there is no direct risk of exposing structures to flooding hazards. Additionally, given that drainage

Comment B-3
continued

Comment: In 2014, SDG&E entertained the idea of putting a 1MW solar facility adjacent to the substation on Valley Center Road and met with the Valley Center Community Planning Group to discuss. Even though the project never got off the ground, I want to emphasize again SDG&E's acknowledgment of the 100-year floodplain and how they would have designed around it. See below.

| Valley Center Community Planning Group | | | | | | | | | | | | | | |
|--|---|---|----------|-----------|--------|---------|------|---------|----------|--|---------|--------|----|-----------|
| Minutes of the March 10, 2014 Meeting | | | | | | | | | | | | | | |
| Chair: Oliver Smith; Vice Chair: Ann Quinley; Secretary: Steve Hutchison | | | | | | | | | | | | | | |
| 7:00 pm at the Valley Center Community Hall; 28246 Lilac Road, Valley Center CA 92082 | | | | | | | | | | | | | | |
| A=Absent/Abstain BCS=Board of Supervisors PDS=Department of Planning & Development Services DPW=Department of Public Works DRB=Valley Center Design Review Board N=No P=Present R=Recuse SC=Subcommittee TBD=To Be Determined VCCPG=Valley Center Community Planning Group Y=Yea | | | | | | | | | | | | | | |
| Forwarded to Members: 17 March 2014; 10 April 2014 corrected | | | | | | | | | | | | | | |
| Approved: 14 April 2014 | | | | | | | | | | | | | | |
| A [1]* | Call to Order and Roll Call by Seat #: | | | | | | | | | | 7:08 PM | | | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 |
| | HUTCHISON | | GLAVINIC | BRITTSCHN | FRANCK | QUINLEY | VICK | BOULDER | NJOHNSON | SMITH | JACKSON | RUDOLF | | LAVENTURE |
| | A | | P | P | P | P | P | P | P | P | P | P | | A |
| Notes: * numbers in brackets indicate actual order of consideration | | | | | | | | | | | | | | |
| Quorum Established: 10 present | | | | | | | | | | | | | | |
| B [2] | Pledge of Allegiance | | | | | | | | | | | | | |
| C [3] | Approval of Minutes: | | | | | | | | | | | | | |
| Motion: Move to approve the minutes of February 10, 2014 | | | | | | | | | | | | | | |
| Maker/Second: Rudolf/Jackson | | | | | | | | | | Carries/Fails: 10-0-0 (Y-N-A) Voice | | | | |
| D [4] | Public Communication/Open Forum: | | | | | | | | | | | | | |
| Jon Vick distributes copies of Parks & Recreation District Survey to all VCCPG Members and all members of audience, urging participation. | | | | | | | | | | | | | | |
| E | Action Items [VCCPG advisory vote may be taken on the following items]: | | | | | | | | | | | | | |
| E1 [6] | Informational item on the proposed construction, operation and maintenance of a photovoltaic (PV) solar facility on land owned by SDG&E next to the existing substation at 29560 Valley Center Road. Facilities will allow for the long-term generation of energy from solar power connected to the local electrical distribution grid. Overall production capacity is expected to be enough to serve 500 households. (Smith) | | | | | | | | | | | | | |
| <p>Discussion: Ian Stewart, SDG&E Regional Public Affairs presents information sheet, trails map and photo of area for proposed 1-megawatt solar facility adjacent to SDG&E Substation on VC Road. He explains the line around the parcels shows the area to which they must give legal notice of the project. It will be constructed on approximately 4 ¼ acres of the 6-acre parcel, the balance vacant to avoid the 100-year floodplain through the parcel. The panel will be fixed at a 20-degree tilt, and staggered in height to ensure all panels will be 12 inches above the potential high water level. He introduces the IES design/construction contractor members, who explain their expertise and indicate construction would probably begin in about 1 year. Members Johnson and Glavinic express concern that VC will become target for even more sites. Mr. Stewart says their plans are for a 2-megawatt site in Pala and 5 megawatt in Ramona, and explains the potential is unlikely but exists. The capacity of the substation is the limit, but there has to be a need for the electricity, and someone has to pay the cost. He states there will be no chemicals to affect adjacent wells using groundwater, all lines are insulated so no possibility of arcing to cause fire, connection to substation will be underground 12K pole on-site.</p> <p>Chairperson Smith says aesthetics will be a major issue. Landscape consultant Amanda Gonzales says the on-site oaks will have to be removed, and mitigated for. Member Rudolf expresses frustration at lack of specificity in proposal, process requiring submittal to VCCPG before definitive project can be presented for comment. As Chairperson of VC Trails Association, he requests trail through project site connecting VC Road to Vesper Road, and potential future pathways along those roads to make circle with new trails on Sol Orchard solar project farther</p> | | | | | | | | | | | | | | |

Parcel Lookup Tool Map



The developer Terra-Gen should have done their due diligence in getting a CLOMR/LOMR from FEMA first during their initial site preparation with the landowner. Both are trying to put the cart before the horse now. Mark Turner, VP Energy Storage Development Terra-Gen, said his company has studied this site since 2016 during his July 13th meeting with the Valley Center Community Planning Group. (See Valley Roadrunner article on 7/16 – Planners say thumbs down to battery storage project.)

San Diego Gas & Electric Company, as you see in those documents took the 100-year floodplain very seriously in their decision making and siting of their facility. Even though Valley Center Energy Storage will be privately owned and operated, it will be an extension to the SDG&E's substation and must be held to the same strict standards when it comes to flooding hazards. This site plan designed with 58 sets of enclosed hazardous battery containers, inverters/transformers, etc. on 8.93-acres in a FEMA Zone A floodplain is irresponsible and naive by the developer. **Please reject this Site Plan and have Terra-Gen go back to the drawing board on a scaled down design not in the flood zone or an alternative site.** Thank you for your time and consideration.

Respectfully,

John J. Corley

From: [Aaron Reisner](#)
To: [Ochoa, Regina](#)
Cc: [Carl Skaja](#); [Bizz McBriar](#)
Subject: Valley Center Energy Storage--Socalta Objection
Date: Wednesday, August 5, 2020 2:28:49 PM
Attachments: [Valley Stream Ranch Appraisal Report Final.pdf](#)

Ms. Ochoa:

As you recall, our firm represents the interests of the owners (Socalta) of several properties (Valley Stream Ranch) adjacent to or near the proposed Valley Center Energy Storage. Pursuant to the Public Disclosure Notice dated June 25, 2020, we are submitting the following comments and concerns regarding the proposed project and land use.

By way of background, Valley Stream Ranch is comprised of 195.36 acres with addresses of 28341, 29535, 29553 & 29637 Valley Center Road. The proposed battery storage project will border the ranch's property at its east and south boundaries. Socalta is rightfully concerned about the health and safety issues associated with a battery storage facility being in close proximity to their property, as well as the impact on value.

We are attaching for your review and consideration an appraisal analysis of the project impacting the value of Socalta's property as well as the health and safety concerns. The report provides a thoughtful analysis of how the project will impact the aesthetics of the ranch's property as well as concerns such as fire and thermal runaway. Potential damages typically associated with these type of projects relate to: 1) the perception of possible health effects from electric or magnetic fields (EMF); 2) the potential noise and visual unattractiveness of the transmission line(s); 3) the proximity of existing improvements to the project facilities and any additional facilities that could be built within the foreseeable future; and 4) the potential interference with future land uses.

Based on the above and other factors noted in the report, Socalta's property will be devalued from the current appraisal of \$5,519,000 to \$4,415,000; or, **over \$1,000,000**. Socalta therefore **opposes** the proposed project based on the significant financial impact they will incur and the unpredictable health concerns associated with the battery storage facility.

Please confirm receipt of this correspondence and do not hesitate to contact us with any comments. Socalta is open to discussing ways to mitigate the financial and environmental impact on their property. As the appraisal notes, the subject property is rarely noted in the EIR studies and there is no recognition that there are seven residences on the property; just comments about its agricultural character.

We look forward to a response from you and/or the developer of the project.

Sincerely,

Aaron H. Reisner

Aaron H. Reisner, Esq.
SKAJA | DANIELS | LISTER | PERMITO LLP

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Valley Stream Ranch

APPRAISAL REPORT

VALLEY STREAM RANCH

195.36 ACRES OF LAND WITH IMPROVEMENTS

28341, 29535, 29553 & 29637 VALLEY CENTER ROAD

VALLEY CENTER

SAN DIEGO COUNTY

CALIFORNIA

APPRAISED FOR

Ranitea Harispuru on Behalf of Socalta
29553 Valley Center Road
Valley Center, CA 92082-6210

DATE OF VALUATION

July 16, 2020

DATE OF REPORT

July 20, 2020

APPRAISED BY

William B. Anderson, MAI, SRA
Anderson & Brabant, Inc.
353 W. 9th Avenue
Escondido, California 92025

File No. 20-054

ANDERSON & BRABANT, INC.

Real Estate Appraisers & Consultants

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Tel: 760-705-1591 Direct

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July 20, 2020

Ms. Ranitea Harispuru
on Behalf of Socalta
29553 Valley Center Road
Valley Center, CA 92082-6210

RE: Appraisal of the Valley Stream Ranch
Valley Center, CA 92082-6210

Dear Ms. Harispuru:

At your request and authorization, we have completed our appraisal of 195.36 acres of land and all improvements thereon located at 28341, 29535, 29553 & 29637 Valley Center Road in the community of Valley Center. The land is improved with seven residences, farm barns and garages, a pool house and a pool. The unimproved portions are primarily flat farm land with some gently sloping terrain at the south side of the property.

The objective of this appraisal is to provide our client estimates of market value as the property exists today, and subject to the influence of a proposed battery storage facility on an adjacent 8.93-acre industrial zoned parcel. The opinions expressed herein are set forth as of July 16, 2020, the last date of our property inspection.

The following is recognized as an Appraisal Report under the Uniform Standards of Professional Appraisal Practice (USPAP). As such, our report is intended to comply with the reporting requirements set forth under Standards Rule 2-2(a) of USPAP. It has been prepared in conformance with the Code of Professional Ethics and Standards of Professional Practice of the Appraisal Institute.

Based upon an investigation and analysis of relevant market data, it is our opinion that the market value of the appraised property as it exists today is **\$5,519,000**. Upon completion of construction of the battery storage facility and once it becomes operational, we estimate that the appraised property will suffer a diminution in value equivalent to 20 percent of the previously noted market value. This results in an estimated market value of \$4,415,000, rounded. This estimate reflects our opinion of what a buyer would pay for the property because of the presence of the battery storage facility.

These estimates are subject to the General and Special Assumptions and Limiting Conditions, and the Certification contained herein.

Ms. Ranitea Harispuru
Appraisal of the Valley Stream Ranch
July 20, 2020
Page 2

Thank you for this opportunity to be of service and if we can be of further assistance in this matter, please let us know.

Respectfully submitted,

ANDERSON & BRABANT, INC.

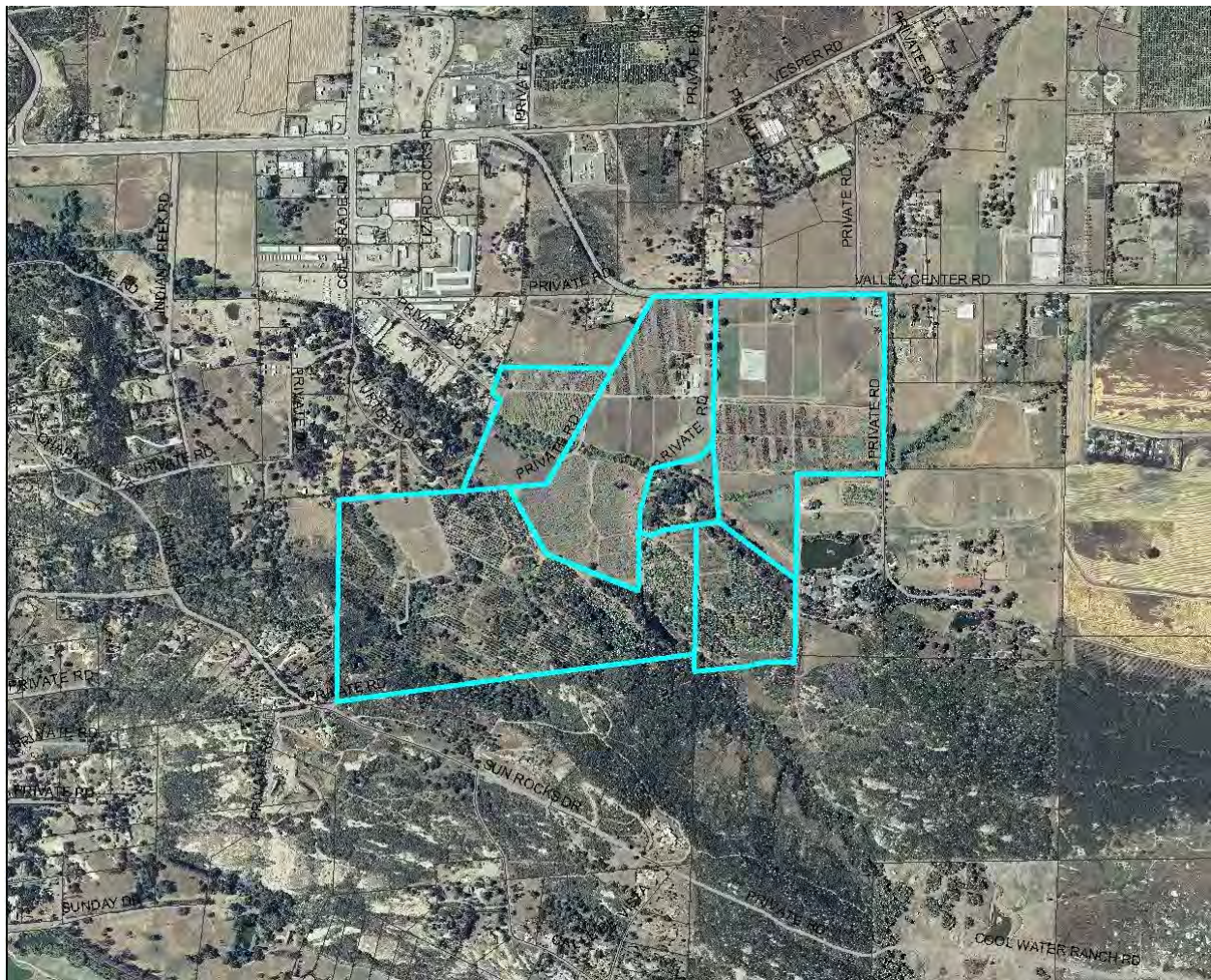
A handwritten signature in blue ink, reading "William B. Anderson", written over a horizontal line.

William B. Anderson, MAI, SRA
Certified General Real Estate Appraiser
BREA State Certification No. AG002315

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AERIAL VIEW OF THE SUBJECT PROPERTY



The approximate boundaries of the appraised property are outlined.

EXECUTIVE SUMMARY

Appraised Property: 28341, 29535, 29553 & 29637 Valley Center Road in the community of Valley Center, San Diego County, CA

Assessor Parcel Nos.: 189-020-37-00, 189-020-38-00, 189-013-22-00, 189-013-23-00, 189-013-24-00, 189-013-25-00

Owner of Record: SOCALTA SA

Land Description:

Size: 195.36 acres gross

Zone/General Plan:

| APN | Acreage | Zone | Gen Plan |
|------------|---------|----------|----------|
| 189-020-37 | 47.35 | A70-2 | SR-4 |
| 189-020-38 | 16.25 | A70-2 | SR-4 |
| 189-013-22 | 38.46 | A70/RR-2 | SR-4 |
| 189-013-23 | 6.39 | A70-2 | SR-4 |
| 189-013-24 | 71.66 | A70-2 | SR-4 |
| 189-013-25 | 15.25 | RR-2 | SR-2 |
| Totals | 195.36 | | |

Flood Zone: Shown on FEMA flood map 06073C0810G, dated May 16, 2012 as partially within Flood Zone A – areas with a 1% annual chance of flooding; and Flood Zone X – areas of minimal flood hazard.

Seismic Hazard: None known

Topography: Ranges from level to gently rolling hillsides

Access: The property takes access from Valley Center Road

Utilities: Electrical power; telephone, municipal water available through three water meters in use, four wells

Improvements: Seven residences, garages, metal workshop/office, warehouse, pool house/garage, carport, bridge, 2 pools and a tennis court

Interest Appraised: Encumbered fee estate

Highest and Best Use: Continuation of the current farming operation on approximately 80 acres. Presently the existing homes and other structures and improvements add significant appeal to the property and while they underutilize the land, they contribute to value. The land could also accommodate a plant nursery operation and at some future date, the existing general plan land use designations allowing minimum two to four acre lots could facilitate subdivision as demand warrants. The southern elevated portions of the land would be an ideal location for future homesites.

EXECUTIVE SUMMARY*Continued*

Date of Value: July 16, 2020

Date of Report: July 20, 2020

Exposure Time: Up to 12 months

Special Assumptions: Refer to page 4

**Extraordinary
Assumptions:** None

**Hypothetical
Conditions:** None

| | | |
|---------------------------|--|--------------------|
| Value Conclusions: | Market Value As Is: | \$5,519,000 |
| | With Battery Storage Facility in Place: | \$4,415,000 |

ASSUMPTIONS AND LIMITING CONDITIONS

This appraisal is subject to the following special assumptions and limiting conditions:

1. It is assumed that the existence of significant cultural or mineral resources, if any, discovered within the subject parcel will not create any abnormal hardship nor measurably impact market value in conjunction with our determination of highest and best use.
2. The opinions and conclusions included in this appraisal are based on information available and/or discovered as of the date of the appraisal. The appraiser reserves the right to change those opinions and conclusions if additional information which is in any way pertinent, such as items specific to the property or additional market data, becomes available and/or is discovered subsequent to the appraisal date.
3. A hypothetical condition is defined as a condition, directly related to a specific assignment, which is contrary to what is known by the appraiser to exist on the effective date of the assignment results, but is used for the purpose of analysis. For the second part of this analysis, we have assumed that the battery storage facility proposed for an adjacent property will be built as presently designed. No other hypothetical conditions were considered in this analysis.

This appraisal is subject to the following general assumptions and limiting conditions:

1. It is assumed that information furnished to us by our client is substantially correct.
2. No responsibility is assumed for matters legal in character, nor do we render an opinion as to title, which is assumed to be held in fee simple interest as of the date of valuation unless otherwise specified.
3. It is assumed that the property is readily marketable, free of all liens and encumbrances except any specifically discussed herein, and under responsible ownership and management.
4. Photographs, plats, and maps furnished in this appraisal are to assist the reader in visualizing the property. No survey has been made or provided and no responsibility has been assumed in this matter.
5. Possession of this report, or a copy thereof, does not carry with it the right of publication. It may not be used for any purpose by any person other than the party or parties identified as Intended Users, without the written consent of Anderson & Brabant, Inc. In any event, the report may be used only with proper written qualification and only in its entirety.
6. Disclosure of the contents of this appraisal report is governed by the by-laws and regulations of the Appraisal Institute. Neither all nor any part of the contents of this report (especially reference to the Appraisal Institute or the MAI designation) shall be disseminated to the public through advertising media, public relations media, news media, sales media, or any other public means of communication without prior written consent and approval of Anderson & Brabant, Inc.
7. The submission of this report constitutes completion of the services authorized. It is submitted on the condition that the client will provide Anderson & Brabant, Inc. customary

Valley Stream Ranch

compensation relating to any subsequent required depositions, conferences, additional preparation or testimony.

8. The valuation estimate is of surface rights only and the mineral rights, if any, have been disregarded.

9. No warranty is made as to the seismic stability of the subject property.

10. It is assumed that all applicable zoning and land use regulations and restrictions have been or will be complied with, unless a nonconformity has been stated, defined, and considered in this appraisal report.

11. As part of the analysis, we have estimated reasonable exposure and marketing periods for each appraised property at between six months and one year. The reported marketing period is based on the assumption that the property is marketed competently at a price that reflects market value. It is possible that market conditions could change during the marketing period if offered for sale today, and those changing conditions could affect both market value and marketing period.

APPRAISERS' CERTIFICATION

I do hereby certify that, to the best of my knowledge and belief ...

1. The statements of fact contained in this report are true and correct.
2. The reported analyses, opinions, and conclusions are limited only by the reported assumptions and limiting conditions and are my personal, impartial, and unbiased professional analyses, opinions, and conclusions.
3. I have no present or prospective interest in the property that is the subject of this report and no personal interest with respect to the parties involved.
4. I have performed no services, as an appraiser or in any other capacity, regarding the property that is the subject of this report within the three-year period immediately preceding acceptance of this assignment.
5. I have no bias with respect to the property that is the subject of this report or to the parties involved with this assignment.
6. My engagement in this assignment was not contingent upon developing or reporting predetermined results.
7. My compensation for completing this assignment is not contingent upon the development or reporting of a predetermined value or direction in value that favors the cause of the client, the amount of the value opinion, the attainment of a stipulated result, or the occurrence of a subsequent event directly related to the intended use of this appraisal.
8. My analyses, opinions, and conclusions were developed, and this report has been prepared, in conformity with the Uniform Standards of Professional Appraisal Practice.
9. I have made a personal inspection of the property that is the subject of this report.
10. No one provided real property appraisal assistance to the person signing this certification.
11. The reported analyses, opinions, and conclusions were developed, and this report has been prepared, in conformity with the Code of Professional Ethics and Standards of Professional Appraisal Practice of the Appraisal Institute.
12. The use of this report is subject to the requirements of the Appraisal Institute relating to review by its duly authorized representatives.
13. As of the date of this report, I have completed the continuing education program for Designated Members of the Appraisal Institute.



William B. Anderson, MAI, SRA
Certified General Real Estate Appraiser
BRE A State Appraiser No. AG002315
Expires May 31, 2022

July 20, 2020

Date

IDENTIFICATION OF THE PROPERTY

The property under appraisal involves six Assessor tax parcels with a gross area of 195.36 acres, improved with seven residences, garages, metal workshop/office, warehouse, pool house/garage, carport, bridge, 2 pools and a tennis court. It is located on the south side of Valley Center Road, a short distance east of its intersection with Cole Grade Road in the unincorporated area of north San Diego County known as Valley Center.

Reported Owner of Record: SOCALTA SA

Assessor Parcel Numbers: 189-020-37-00, 189-020-38-00, 189-013-22-00, 189-013-23-00, 189-013-24-00, 189-013-25-00

PURPOSE OF THE APPRAISAL

The purpose of this appraisal is to estimate the market value of the property rights appraised, both as these rights pertain to the subject as it currently exists and after development of a battery storage facility on an adjacent property. As used in this report, Market Value is defined as follows:

MARKET VALUE is the most probable price, as of a specified date, in cash, or in terms equivalent to cash, or in other precisely revealed terms, for which the specified property rights should sell after reasonable exposure in a competitive market under all conditions requisite to a fair sale, with the buyer and seller each acting prudently, knowledgeably, and for self-interest, and assuming that neither is under undue duress.¹

INTENDED USE & USER

The intended users are the client, Ranitea Harispuru on behalf of SOCALTA, and the clients' attorneys. It is our understanding that this appraisal report and the opinions contained herein will be utilized by the intended users in connection with possible litigation having to do with development of a battery storage facility on adjacent property.

PROPERTY RIGHTS APPRAISED

We have estimated the market value of the encumbered fee interest in the herein described 195.36 acres subject property, along with all building improvements and appurtenances located thereon.

EXTRAORDINARY ASSUMPTIONS

An extraordinary assumption is defined as an assumption, directly related to a specific assignment, as of the effective date of the assignment results, which, if found to be false, could alter the appraiser's opinions or conclusions. No extraordinary assumptions were considered in our analysis.

¹ *The Appraisal of Real Estate*, 14th ed. (Chicago: Appraisal Institute, 2013), p. 58

HYPOTHETICAL CONDITIONS

A hypothetical condition is defined as a condition, directly related to a specific assignment, which is contrary to what is known by the appraiser to exist on the effective date of the assignment results, but is used for the purpose of analysis. For the second part of this analysis, we have assumed that the battery storage facility proposed for an adjacent property will be built as presently designed. No other hypothetical conditions were considered in this analysis.

EFFECTIVE DATE OF VALUE OPINIONS

The value conclusions are set forth as of July 16, 2020.

DATE OF REPORT

The date of the report is July 20, 2020.

RECENT HISTORY OF THE SUBJECT PROPERTY

The subject property has been under the same legal vesting since at least 2001 and it has not been on the open market for sale or lease since that time.

SCOPE OF WORK

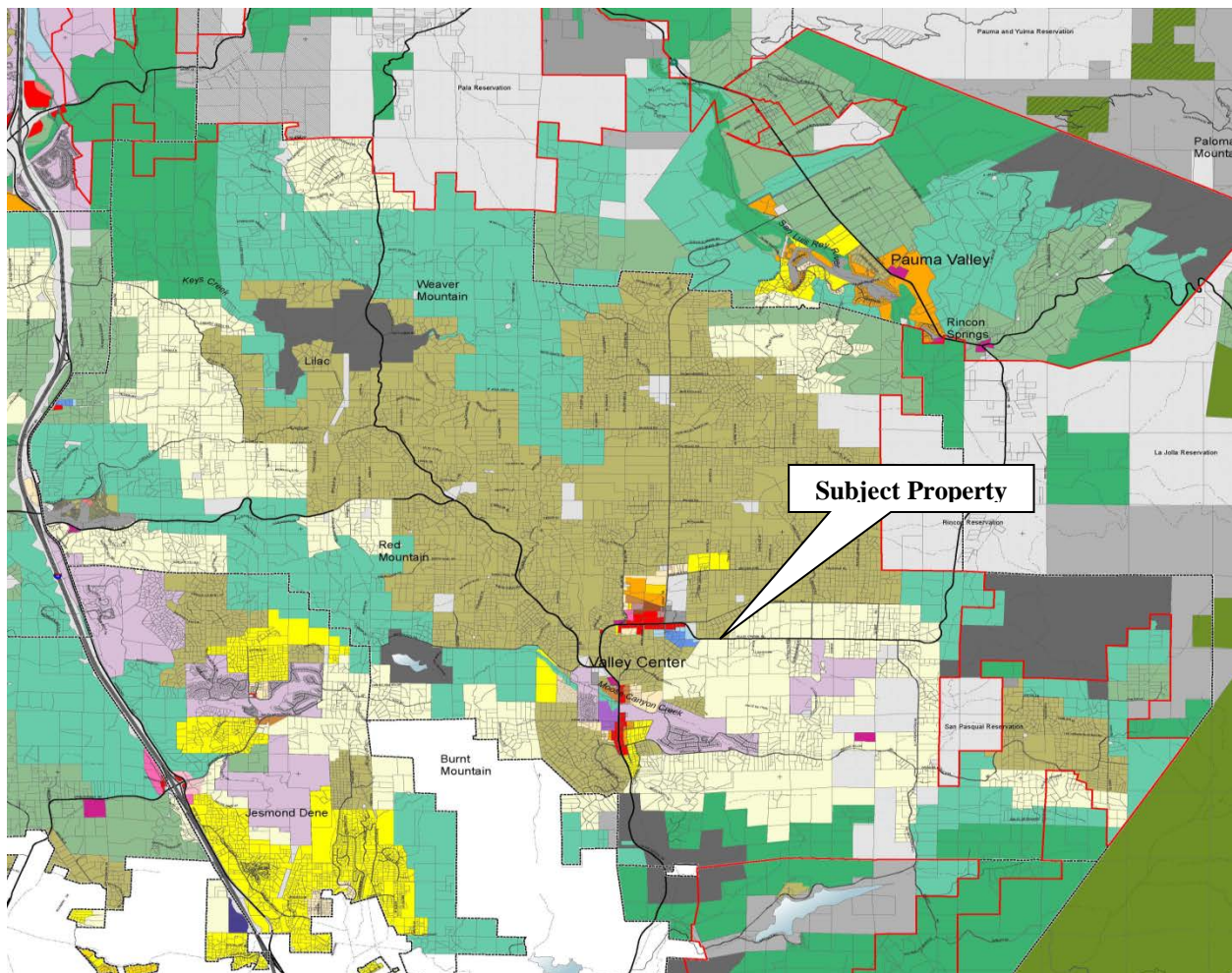
In preparing this appraisal report, we have completed the following tasks.

- Discussed the appraisal assignment with the client and their attorney's.
- Set forth all assumptions and limiting conditions affecting the appraisal.
- Inspected the subject property and took photographs on July 16, 2020.
- Analyzed market conditions for property with similar overall characteristics to the one being appraised.
- Researched County of San Diego public records for information regarding existing zoning and general plan designations and associated constraints to future development.
- Estimated highest and best use of the appraised property.
- Researched the current market for listings and sales of properties to be used in the valuation analysis.
- Researched properties subject to detrimental conditions from exterior sources.
- Compared the chosen market data to the subject property for identified elements of comparison making adjustments judged supportable in the open market.
- Arrived at value conclusions considering the stated definition of value with estimates of market value as the property currently exists, and upon development of the battery storage facility on an adjacent site.
- Prepared the appraisal report.

Valley Stream Ranch

PRIOR APPRAISAL SERVICES

We have not performed any services regarding the subject parcel, as appraisers or in any other capacity, within the three (3) year period immediately preceding acceptance of this appraisal assignment.

LOCATION MAP**REGIONAL DESCRIPTION**

The subject property is located within the unincorporated community of Valley Center in San Diego County and it is within the Valley Center Community Planning Area. San Diego County is located in the extreme southwesterly corner of the United States and is bordered by the Pacific Ocean to the west, the California/Mexico border to the south, Orange and Riverside Counties to the north, and Imperial County to the east. San Diego County is the second largest county in the State of California based on population which, as of January 1, 2020, was estimated by the California Department of Finance Demographic Research Unit at 3,343,355 persons. This reflects an increase of about 0.091 percent from the January 1, 2019 total of 3,340,312.

The county includes the State's second most populous city and offers such geographic features as mountainous regions of the Cleveland National Forest, the Anza Borrego Desert, the International Border with Mexico, and over 50 miles of Pacific Ocean coastline. These features,

Valley Stream Ranch

and the area's temperate year-round climate, are among the county's major attractions. Most of the county's population is located along the coastal region, inland valleys, and foothills, within approximately 25 to 30 miles of the ocean. The mountains and deserts are only sparsely developed and populated.

On a regional basis, San Diego County is served by three major freeways. These include Interstate 5, a coastal route connecting San Diego with Baja California to the south and the states of California, Oregon, and Washington to the north; Interstate 8, a major east-west route connecting San Diego with Arizona and other southwestern states to the east; and Interstate 15, an inland route connecting San Diego with Riverside and San Bernardino Counties and other points to the northeast. There are several important local freeways that provide access within the region. These include Interstate 805 that runs inland from and parallel to Interstate 5; State Route 94, parallel to Interstate 8; State Route 163, connecting Interstate 15 with Downtown San Diego; and State Route 78, the major east-west freeway in northern San Diego County.

San Diego International Airport (Lindbergh Field) is located about 40 miles southwest of the subject and is close to Downtown San Diego. This airport is serviced by 18 commercial airlines and four scheduled air-freight services. There are an additional eight small public airports located throughout the county. There is little commercial air activity at these facilities. Rail service is provided by San Diego and Arizona Eastern Railroad, Santa Fe Railroad, and Amtrak. Industrial/commercial use of the rail lines for freight carriage has declined in San Diego over the past 15+ years. However, the Amtrak line between San Diego and Los Angeles is popular with commuters. The North County Transit District (NCTD) operates the *Coaster* and *Sprinter* commuter train systems. The *Coaster* provides north/south service to eight stations between Oceanside and downtown San Diego, with more than 20 trains on weekdays and additional service on weekends. The *Sprinter* provides east/west service to fifteen stations between Oceanside and Escondido, running every 30 minutes in each direction Monday through Friday, from approximately 4 AM to 9 PM; Saturday trains run later. The San Diego Trolley (light rail transit system) has opened several commuter routes in the southern and eastern portions of San Diego County that have proven very popular. This service is scheduled to be expanded soon to other areas of the County. Individual transit districts throughout the county provide local bus service.

The economy within the San Diego region, until recently, was continuing to improve after a significant global financial crisis, considered the worst of its kind since the Great Depression. The poor economic conditions became prominently visible in the past decade with the failure, merger or conservatorship of several large United States-based financial firms. The underlying causes leading to the crisis had been reported in business journals with commentary about the financial stability of leading United States and European investment banks, insurance firms and mortgage banks consequent to the subprime mortgage crisis that commenced in 2007. The failures of large financial institutions in the United States and Europe led to dramatic declines in various stock indexes and significant reductions in the market-value of equities (stock) and commodities worldwide. The crisis led to a liquidity problem and the de-leveraging of financial institutions, especially in the United States and Europe, which further accelerated the

Valley Stream Ranch

liquidity crisis. World political leaders, national ministers of finance, and central bank directors coordinated efforts to reduce economic fears.

However, there is a new factor that could change things. Economic conditions and the market for most types of real estate in San Diego in recent years have been positive. Markets for residential, commercial and industrial properties have been good, with low interest rates, low inflation and very low unemployment rates. However, things have changed.

The outbreak of a “novel coronavirus” known as COVID-19 was identified in Wuhan, China in December 2019. The virus has quickly spread worldwide and is now impacting the United States, including the State of California. It was officially declared a pandemic by the World Health Organization (WHO) on March 11, 2020. California is one of many states to declare a state of emergency due to the spread of the virus.

The phrases “Stay Home” and “Social Distancing” are familiar to everyone. The short-term effects on the country have been dramatic. The stock market has been reacting in roller-coaster fashion with substantial downturns and upswings. Many local businesses have closed including bars, restaurants, schools, theaters, health clubs, etc. Dramatic impacts are being felt by travel and lodging providers, and many others.

Some short-term economic impacts are already obvious, such as dramatic increases in unemployment claims that until recently were rising every day, lower prices at hotels/motels that remain open, lower fares, and increasing numbers of tenants unable to pay rent at some apartment projects. However, these types of short-term impacts do not tell us what the long-term effect is going to be on the economy and on the real estate market, or the strength or timing of a recovery. There is presently no empirical evidence for the impacts on local real estate directly related to the virus, but that could be coming in the near future.

The reader is cautioned and reminded that the conclusions presented in this appraisal report apply only as of the effective date of this appraisal and are based on data that was available as of that date. The appraiser makes no representation as to the effect on the subject property of any unforeseen event, or additional data that becomes available, subsequent to the effective date of the appraisal.

IMMEDIATE AREA DESCRIPTION

The appraised property is located within the boundaries of the Valley Center Community Planning Area which is in northeastern San Diego County and comprises approximately 95 square miles. The rural Valley Center area is characterized by its low-density residential and agricultural uses. The rolling to hilly terrain that predominates throughout much of the area is utilized for citrus and avocado groves, ornamental flowers and other commercial crops. Residential development primarily consists of lots that are at least two acres in size, in accordance with the Valley Center Community Plan land use designations outside the country town boundary. Most of the dwellings in the area are custom homes that were constructed within the past thirty years, the period during which Valley Center has transitioned from a predominately agricultural community to one with a strong rural-residential influence.

Valley Stream Ranch

The commercial district in Valley Center is primarily located along Valley Center Road, between Woods Valley Road and Cole Grade Road. The development in this area is comprised of small retail and office buildings, several restaurants, gas stations and small multiple-tenant retail centers. There has not been any significant development in the central valley location for several years due to a moratorium on the installation of septic systems. The moratorium was the result of septic tank failures in areas of high ground water tables. That moratorium was lifted in June 1999; however, development in the commercial district has been limited until recently due to the availability of a public sewer system. The Valley Center Municipal Water District has developed the Woods Valley Ranch Water Reclamation Facility and its recent expansion to serve residences and businesses in the North and South Village Areas, and has identified a study area in North Village, the boundaries of which are immediately adjacent to the west boundary of the appraised property.

A significant influence on the Valley Center community, as well as on the surrounding communities of Pala and Pauma Valley, has resulted from the growth of Indian gaming facilities. This north county area is the site of the casino facilities at the Rincon, San Pasqual, Pala and Pauma Reservations, with the facilities at Rincon, San Pasqual and Pala, which all have ties with major gaming corporations, including large hotels and resort style accommodations. These gaming facilities have had impacts on local traffic and have brought a constant flow of visitors to the area.

Valley Center is served by the Valley Center Pauma Unified School District (unified as of July 1, 2000), which operates schools with grades kindergarten through twelfth. Prior to the unification date, high school students attended schools operated by the Escondido Union High School District. The community's first high school opened in the fall of 1998 and the approval for unification followed. The new district operates the high school, as well as the elementary and middle schools in the community.

As of August 3, 2011, the County of San Diego updated its general plan greatly increasing allowable residential densities in the central valley area to include what is referred to as the South Node along Valley Center Road between Woods Valley Road and Lilac Road, and the North Village area which is in the general vicinity of Valley Center Road and Cole Grade Road. The expansion of the Woods Valley Ranch Water Reclamation Facility is intended to provide the impetus for new development in this area of Valley Center.

Urbanization of certain areas within this rural community has been proposed on a number of occasions over the last 10-15 years, and it is occurring today. Most of these proposed projects have either failed entirely or have encountered significant public opposition and regulatory roadblocks. As an example, the former Rancho Lilac property, a residential subdivision that was planned to include a total of 949 acres and a proposed development totaling 354 single-family homes on lots ranging in size from 0.5 to 1.6 acres, is in the northern portion of the community. Land uses within the project were to include 342.7 acres for residential estates, 572 acres of open space and the balance in ancillary uses. The project was to include a wastewater treatment plant to be located near the west end of the Ranch property. This property was recently sold to CALTRANS to help mitigate right of way projects resulting in impacts to endangered habitats. This acquisition will significantly improve the prospects for this area to maintain its rural character, much to the delight of local residents.

Valley Stream Ranch

Another example is Lilac Hills Ranch, a 608-acre master planned development proposed by Accretive Development. Accretive has proposed 1,746 residences consisting of 903 single family detached homes, 164 single family attached homes, 211 mixed-use residential units, and 468 age-restricted dwellings within a neighborhood designated for senior citizens. It would also have 90,000 square feet of commercial office space, a 50-room country inn, a 200-bed group care facility, a recycling facility, a water reclamation facility, a new fire station if not a remodel of the Cal Fire existing Miller station, a site for a K-8 elementary school, 13.5 acres of public parks, 11.5 acres of private parks, 16 miles of trails, and 104 acres of biological open space. The existing general plan land use designation only allows a total of 110 residences on the acreage. This has been a controversial project from the outset and as a result, the San Diego County Board of Supervisors placed the project on a ballot for a countywide vote. It was identified as Measure B on the Ballot. Voters overwhelmingly defeated the measure in the November 8, 2016 election; however, the project has resurfaced. On June 24, 2020, the San Diego County Board of Supervisors voted to reject the project based on a purported deficiency in the proposed fire evacuation plans leaving its future status unknown.

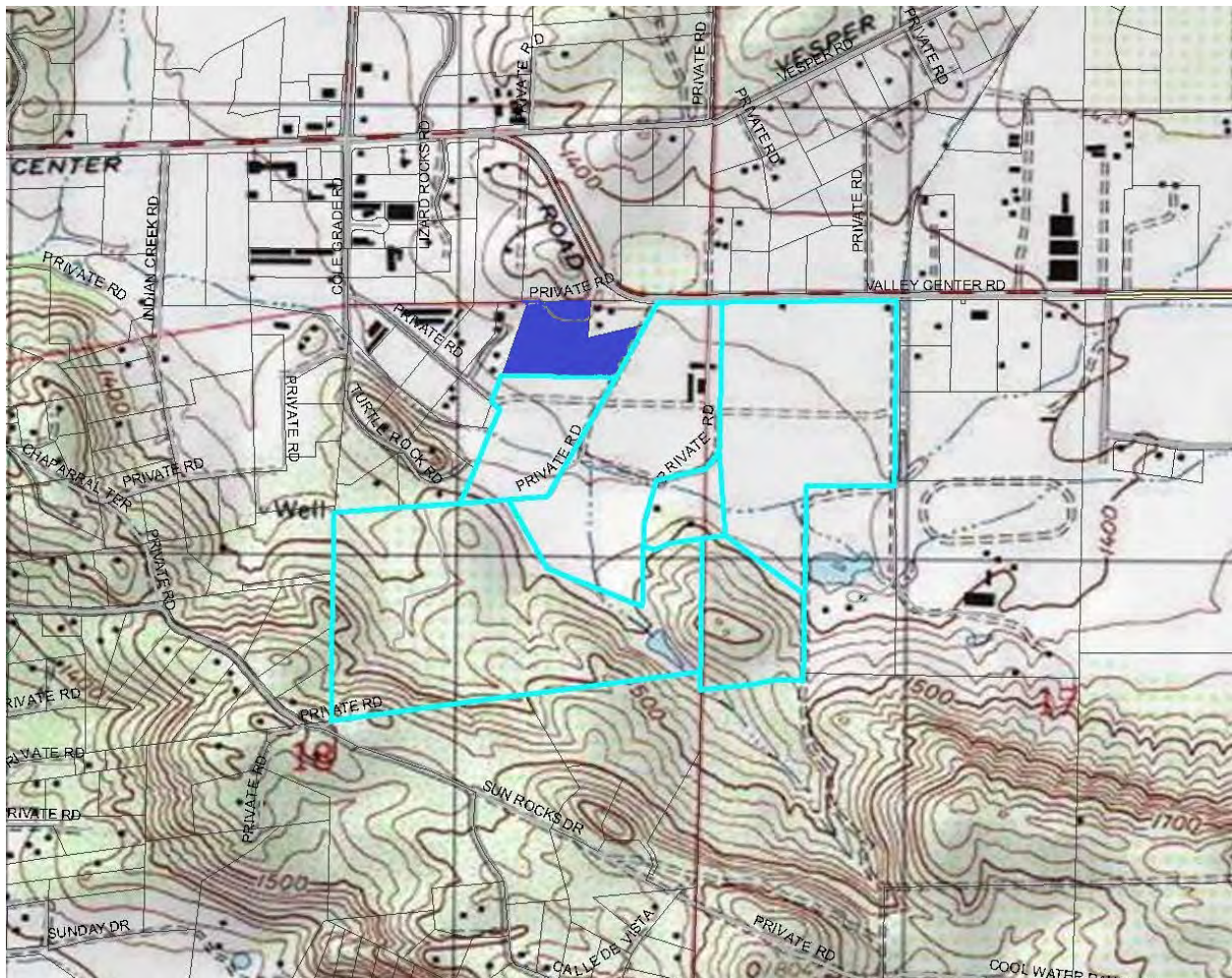
Other projects are either recently developed, under construction or in the development pipeline. Park Circle is a 632 unit single family home development which includes the 300 unit Orchard Run project in the South Village that is currently undergoing grading on the former Konyn Dairy site and will include 33,700 square feet of commercial space; Shady Oak at Park Circle by Kb Homes is currently selling 47 single family homes; Butterfield Trails is a 71-lot single family development with entitlements, but no work underway; and Liberty Bell Plaza, which received County approval on May 29, 2020. This project will include a Von's supermarket and a 12 pump gas station. Also proposed in South Village is a 7,572 square foot veterinary clinic, and a 3,140 square foot dental office on a 2.52 acre site; and a 7,000 square foot AutoZone auto parts store broke ground earlier this year next to Tractor Supply, but is currently on hold due to the coronavirus.

In the North Village a Rite-Aid pharmacy was built on the southeast corner of Cole Grade Road and Valley Center Road during the first quarter of 2020. An Arco (AM/PM) project is proposed for a site across the street from Rite-Aid. The Weston Development on 98.3 acres along Valley Center Road, Miller Road and Cole Grade Road has been in the planning stages for more than a decade, but is currently on hold. It is proposed to ultimately include 590 residential units (214 apartments and 376 attached and detached single family residences) in a project called Williams Riviera Ranch Estates, and the 11.3 acre Towne Center project that will include about 108,000 square feet of commercial and community space. Two other projects in various stages of entitlement and construction include Miller Plaza at the northeast corner of Miller Road and Valley Center Road which will include a Shell service station and convenience store, a Taco Bell restaurant, and an office building. At the southwest corner of Indian Creek Road and Valley Center Road Village Station is proposed which is a multi-building commercial center with pads for restaurants, office buildings and retails outlets. Both of these projects are in North Village.

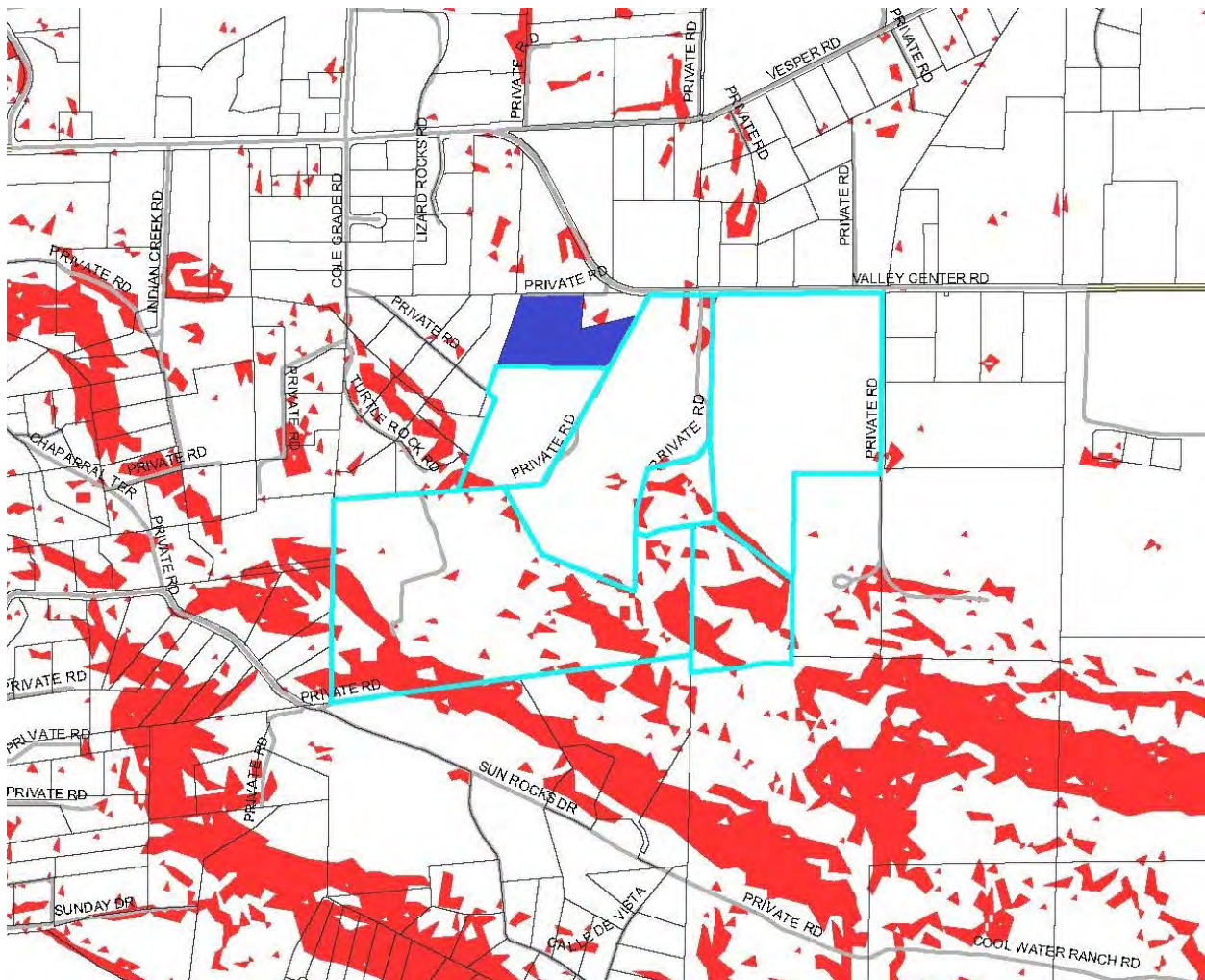
As shown on the map on page 10, the subject property is located in the south central area of the Valley Center Community Planning Area, near the intersection of Valley Center Road and Cole Grade Road. Uses to the east of subject include farming and nursery operations, San Diego

Valley Stream Ranch

Hellhole Canyon County Preserve is a dominant feature in the Valley Center area. Facilities in this over 2000-acre County preserve include a staging area, restrooms, parking for horse trailers, drinking water, an amphitheater and a primitive group camping area (available by reservation only). The canyon itself is crossed by 8.5 miles of hiking and equestrian trails. Benches and interpretive signs are placed along the trails. This is a popular hiking venue, the only one of its kind in the Valley Center community.

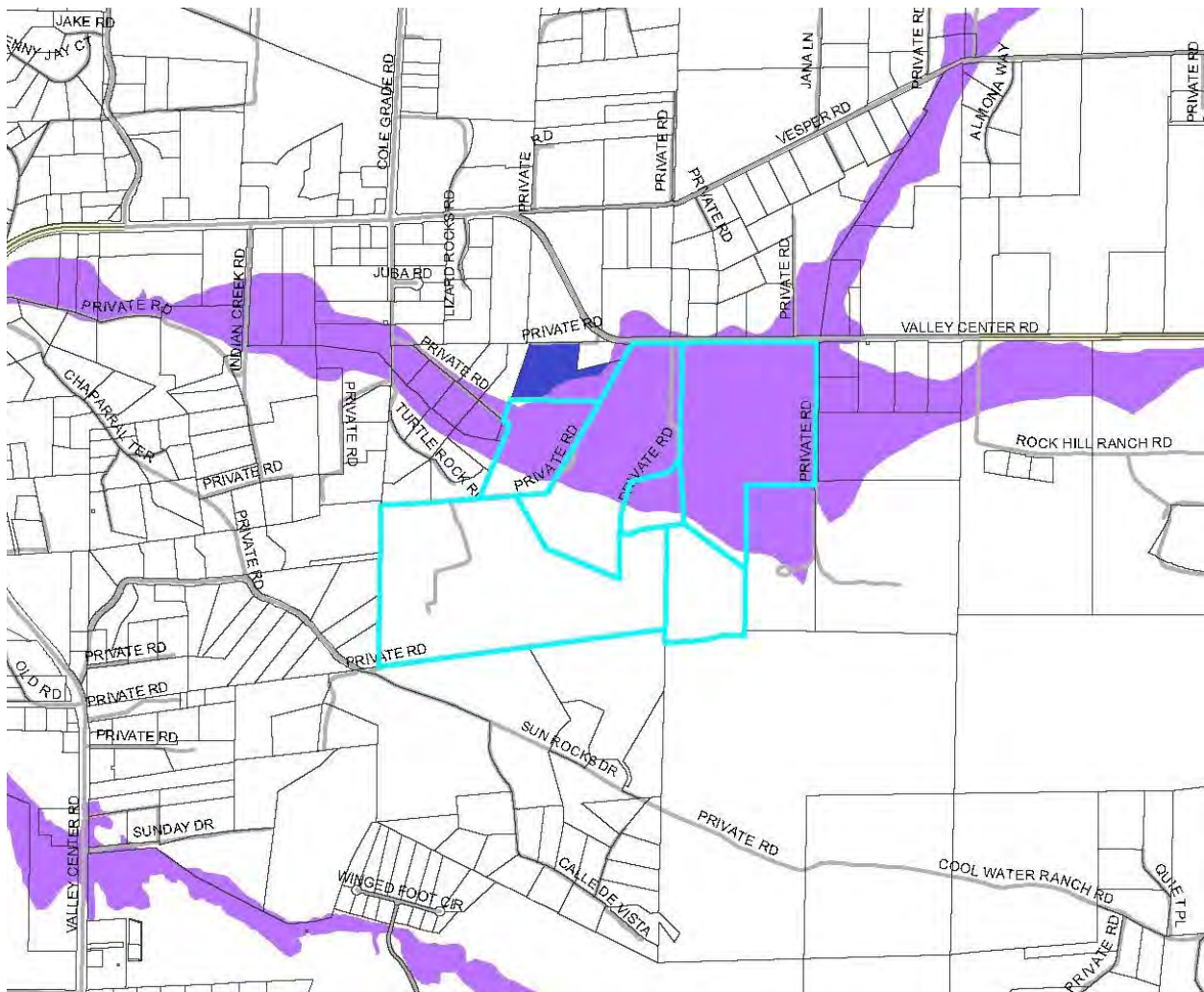
TOPOGRAPHY MAP OF SUBJECT PROPERTY

The location of the proposed battery energy storage facility is shaded blue.

STEEP SLOPES MAP OF SUBJECT PROPERTY

The red highlighted area represents slopes at or in excess of 25 percent. The location of the proposed battery energy storage facility is shaded blue.

Valley Stream Ranch

FEMA IDENTIFIED FLOODPLAIN ACROSS THE SUBJECT PROPERTY

The area highlighted is subject to inundation by the 100-year frequency flood event. Boundaries of the floodplain are approximate. The location of the proposed battery energy storage facility is shaded blue and it can be seen that a portion of the site is in the 100-year floodplain.

DESCRIPTION OF THE SUBJECT PROPERTY

LAND DESCRIPTION

| | |
|-----------------------------|--|
| Land Area: | The subject property consists of six Assessor tax parcels with a gross area of 195.36 acres. |
| Shape: | Irregular |
| Access/Street Improvements: | The land has approximately 1,740 feet of frontage on and takes access from Valley Center Road, a two lane publicly maintained right of way. |
| Topography/View: | Level to gently sloping. Slope characteristics are shown in the exhibits on pages 17 and 18. |
| Soils/Drainage: | No soils report was provided. The County of San Diego Initial Study Research Package identifies onsite soils as follows: Visalia sandy loam, 0 to 2 percent slopes; Visalia sandy loam, 2 to 5 percent slopes; Cieneba-Fallbrook rocky sandy loams, 9 to 30 percent slopes, eroded; Clayey alluvial land; Cieneba-Fallbrook rocky sandy loams, 30 to 65 percent slopes, eroded; Fallbrook rocky sandy loam, 9 to 30 percent slopes; and Fallbrook sandy loam, 9 to 15 percent slopes, eroded. Soil conditions are assumed to be adequate for the allowed uses. Drainage appears to be adequate. |
| Utilities: | <p>Electrical power and telephone services are available at the property. The land is located within the service area boundaries of the Valley Center Municipal Water District and water is available to the property as follows:</p> <p>APN 189-020-37-00 – ¾ inch domestic meter</p> <p>APN 189-020-38-00 – No meter</p> <p>APN 189-013-22-00 - 1 inch meter</p> <p>APN 189-013-23-00 - ¾ inch domestic meter</p> <p>APN 189-013-24-00 – No meter</p> <p>APN 189-013-25-00 – 1 inch domestic meter (not active – pulled in 2008)</p> <p>Four water wells serve the irrigation needs of the property. No natural gas is available; propane is provided by a number of vendors in the area. No public sewer is</p> |

Valley Stream Ranch

available; septic systems are commonly used for wastewater disposal.

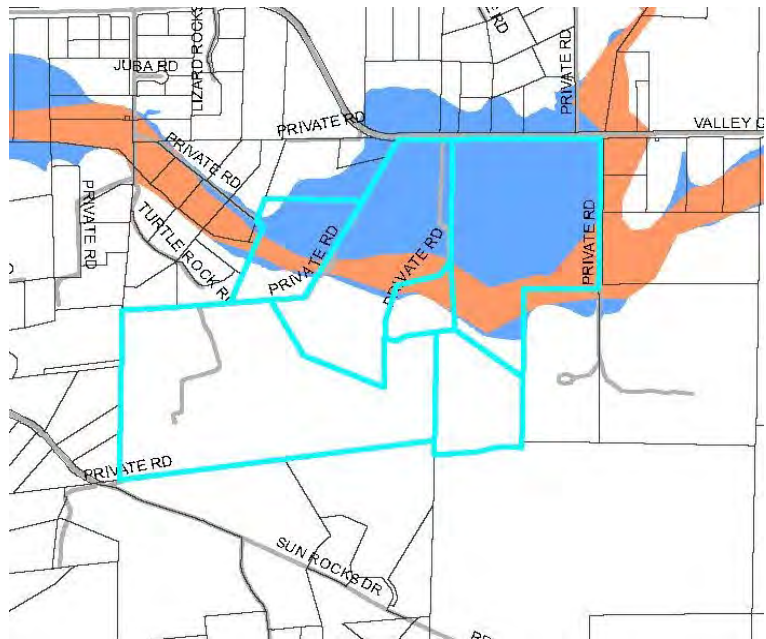
Easements/

Encumbrances:

We have not reviewed a Preliminary Title report for the property. For purposes of this appraisal, it is assumed that there are no existing or undiscovered easements or encumbrances that would adversely affect the land.

Flood Zone:

Portions of the property are located within a FEMA and County of San Diego flood hazard area. According to FEMA Map No. 06073C0810G, dated May 16, 2012, about 85 acres of the land area is within the floodplain and floodway of Keys Canyon Creek and carries the Special Flood Hazard Area Zone of A, areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 30-year mortgage. Because detailed analyses are not performed for such areas, no depths or base flood elevations are shown within these zones. The balance of the property is in Zone X, areas determined to be outside the 0.2% annual chance floodplain. The exhibit below, based on San Diego County Department of Sanitation and Flood Control Floodplain Maps for Keys Canyon Creek (1975), shows the path of Keys Canyon Creek across the subject property. The orange shade is the floodway and the blue is the 100-year floodplain.



Valley Stream Ranch

Flood Zone Continued:

The owners have done extensive flood control mitigation work on the property to include building a dam/spillway and reinforcing the slope banks to channelize the stream as it crosses their property. A bridge has been built to facilitate crossing the stream for access to southern portions of the land and improvements. These improvements likely remove a significant area of the property out of the floodplain and FEMA has a process to modify existing mapping called a LOMR. A Letter of Map Revision (LOMR) is FEMA's modification to an effective Flood Insurance Rate Map (FIRM), or Flood Boundary and Floodway Map (FBFM), or both. LOMRs are generally based on the implementation of physical measures that affect the hydrologic or hydraulic characteristics of a flooding source and thus result in the modification of the existing regulatory floodway, the effective Base Flood Elevations (BFEs), or the Special Flood Hazard Area (SFHA). The LOMR officially revises the Flood Insurance Rate Map (FIRM) or Flood Boundary and Floodway Map (FBFM), and sometimes the Flood Insurance Study (FIS) report, and when appropriate, includes a description of the modifications. The LOMR is generally accompanied by an annotated copy of the affected portions of the FIRM, FBFM, or FIS report.

Earthquake Zone:

The subject property is not located within an identified Earthquake Zone.

Environmental/
Constraints:

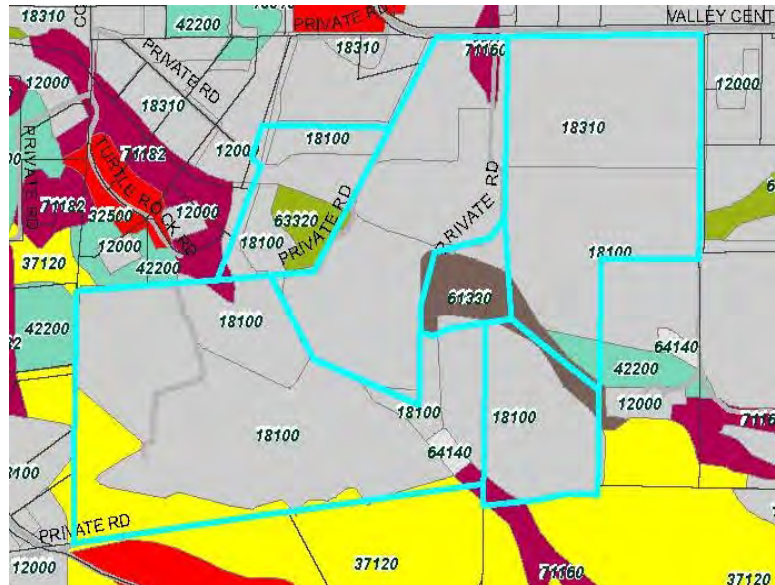
The County of San Diego has adopted the Multiple Species Conservation Program Subarea Plan (MSCP), which is a comprehensive, long-term habitat conservation plan that addresses the needs of multiple species and the preservation of natural vegetation communities in San Diego County. The MSCP addresses the potential impacts of urban growth, natural habitat loss and species endangerment and creates a plan to mitigate for the potential loss of covered species and their habitat due to the direct impacts of future development of both public and private lands within the MSCP area.

The subject property is within the proposed North County Segment of the MSCP. The subarea plan for this portion of unincorporated lands within the County's jurisdiction, the North County Multiple Species Conservation Program

(NCMSCP), is not yet approved. When the Final NCMSCP is approved, an Implementation Agreement between the County and the wildlife agencies, specific to this area of unincorporated lands within the County's jurisdiction, will be signed.

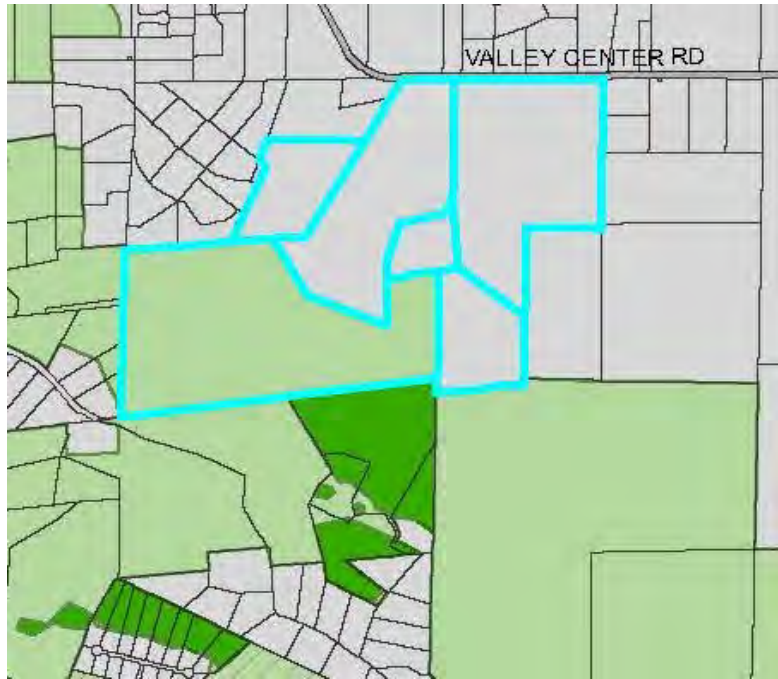
Until these documents are finalized, however, development in the area must continue to meet the conditions of the County's Resource Protection Ordinance and other established regulations. These regulations permit the development of sensitive lands as long as adequate compensatory mitigation is provided. This may involve onsite, offsite, or a combination of onsite and offsite habitat protection through fee title transfer, conservation easement, or other appropriate title encumbrances acceptable to the Wildlife Agencies and the County.

According to the County of San Diego Initial Study Research Packet (ISRP), the land features varied habitats as shown on the map below. The gray area is Disturbed Habitat; the yellow area is Southern Mixed Chaparral; the brown area is Riparian Forest; and the green area is Riparian Scrub.



As shown in green on the map below, all of Assessor Parcel No. 189-013-24-00 is within a Pre-Approved Mitigation Area (PAMA) according to the Draft North County MSCP.

Valley Stream Ranch



A PAMA is an area with high biological value in which conservation will be encouraged. This will be done by providing mitigation* ratios that favor developing outside of the PAMA and mitigating inside the PAMA. These areas may also be targets for acquisition by various entities from willing sellers when funding is available. *Mitigation - actions to help lessen the severity of a project's impact on the environment. Examples include preserving habitat by open space easement, purchasing “mitigation credits” in a mitigation bank, restoring natural areas, or by other means. Existing Federal and State regulations require reduction of impacts through mitigation for impacts. Any development projects proposed within the PAMA must conform to specific guidelines set by the County of San Diego and wildlife agencies.

Zoning/General Plan:

The property is under the jurisdiction of the County of San Diego, and is within the Valley Center Community Planning Area. There are two different zone designations which are summarized in the following chart. The A70 classification is a Limited Agriculture land use that permits some residential uses, in this case on minimum two acre parcels. The RR designation refers to Rural Residential land uses which also requires minimum two-acre parcels. The SR general plan designation refers to Semi-Rural

Valley Stream Ranch

Lands. The number represents the minimum allowed parcel size under each classification.

| APN | Acreage | Zone | Gen Plan |
|------------|---------|----------|----------|
| 189-020-37 | 47.35 | A70-2 | SR-4 |
| 189-020-38 | 16.25 | A70-2 | SR-4 |
| 189-013-22 | 38.46 | A70/RR-2 | SR-4 |
| 189-013-23 | 6.39 | A70-2 | SR-4 |
| 189-013-24 | 71.66 | A70-2 | SR-4 |
| 189-013-25 | 15.25 | RR-2 | SR-2 |
| Totals | 195.36 | | |

Present Use: Agriculture and residential.

IMPROVEMENT DESCRIPTION

The property is improved with a number of structures as identified in the following charts.

| Valley Stream Ranch Improvements | |
|----------------------------------|--|
| APN | Improvements |
| 189-020-37-00 | 1 single family residence, carport and pool |
| 189-013-22-00 | 2 single family residences, garages, warehouse and metal workshop/office |
| 189-013-23-00 | the main family residence, 3 guest houses pool house and pool |

| Valley Stream Ranch Improvements | | |
|-----------------------------------|-------|----|
| Main Residence Living Area (LA) | 2,314 | SF |
| Guest House #1 by Main House LA | 520 | SF |
| Guest House #2 Red House LA | 780 | SF |
| Guest House #3 by Tennis Court LA | 674 | SF |
| Pool House/Garage | 400 | SF |
| Junes House LA | 1,603 | SF |
| Carport at Junes House | 400 | SF |
| Foremans House LA | 1,536 | SF |
| Rental House LA | 1,258 | SF |
| Shed | 156 | SF |
| Garages/Break Room | 5,260 | SF |
| Metal Workshop/Office | 4,200 | SF |
| Warehouse | 3,950 | SF |

Valley Stream Ranch

Interior inspections were not conducted during the course of this appraisal assignment. The improvements were discussed with the client and the following details were provided. In addition, interior photographs were provided and they can be found in the Addenda section of this report. Exterior inspections were conducted on July 16, 2020.

Main House

INDOOR

Fully renovated in 2014

Renovations resembled more of a full rebuild keeping the original design and included: solidified walls and foundation, new roof, upgraded plumbing

Floor covering: ceramic tiles in the entire house (*only exception is in the showers*)

Heating and AC system: ductless heat pump / air conditioner units

- 1 wall-mounted unit in each of the following: 3 bedrooms, living room, and dining room
3 bedrooms:
- 1 master bedroom: includes a walk-in closet, in-suite bathroom, and in-suite office
- 2 guest bedrooms: each has an associated bathroom, but not directly connected
3 bathrooms:
- 1 master bathroom: Jacuzzi bathtub, toilet, double sink vanity, and shower
- 2 guest bathrooms: each has a shower, toilet, and single sink vanity
1 kitchen
- Jenn Air Appliances: microwave, double-door refrigerator and freezer, garbage disposal, dishwasher, double sink, and built-in compressor trash can, oven, induction stove, built-in fan that pull up out of the island
1 dining room
1 living room
- Fireplace

OUTDOOR

Fully redone patio wrapping around the house in 2014, including added small outdoor pond

Outdoor fireplace

Guest House #1 (closest to the Main House)

Fully renovated in 2018

Renovations resembled more of a full rebuild keeping the original design and included: solidified walls and foundation, new roof, upgraded plumbing

Floor covering: ceramic tiles in the entire house (*only exception is in the shower*)

Heating and AC system: ductless heat pump / air conditioner unit in the room

Valley Stream Ranch

1 bedroom, includes a walk-in closet and in-suite office space and a fireplace

1 bathroom with a shower, toilet, and single sink vanity

Guest House #2

Fully renovated in 2016

Renovations resembled more of a full rebuild keeping the original design and included: solidified walls and foundation, new roof, upgraded plumbing

Floor covering: ceramic tiles in the entire house (*only exception is in the shower*)

Heating and AC system: ductless heat pump / air conditioner unit in the room

1 bedroom, includes in-suite office space and in-suite kitchenette with sink and mini-refrigerator

1 bathroom with a shower, toilet, and single sink vanity

- Walk-in closet from the bathroom

Laundry room with new appliances (2016): Samsung washer, Samsung dryer, sink, storage

Guest House #3 (close to the tennis court)

Fully renovated in 2010

Floor covering: plastic “hardwood” floor in the entire house (*only exception is in the shower*)

Heating and AC system: ductless heat pump / air conditioner units

- 1 wall-mounted unit in each of the following: the bedroom and the living room

1 bedroom, includes closet (not walk-in)

1 bathroom with a shower, toilet, and single sink vanity

1 kitchen

- Appliances: microwave, refrigerator and freezer, dishwasher, double sink, oven, and induction stove

1 living room

- 1 fireplace

Other Residences

- Rental House (by the property entrance): 2 bedrooms, 1 bathroom, 1 living room, 1 kitchen
- Foreman’s House: 3 bedrooms, 2 bathrooms, 2 living rooms, 1 kitchen
- Aunt’s House: 2 bedrooms, 2 bathrooms, 1 living room, 1 kitchen, outdoor pool

Other Value-Add Structures & Renovations

- Barns: rebuilt in 2014 to be a 6-door garage enclosed structure
- Tennis court: refreshed 2014
- Pool: rebuilt in 2014

Valley Stream Ranch

- Pool house: rebuilt in 2014 and includes: separated gardening storage room, and connected changing room and bathroom (with a shower, toilet, and single sink vanity)
- Bridge: made wider and solidified structure in 2018
- Stream: consolidated the banks to prevent from flooding hazards in 2020

ASSESSED VALUES AND TAXES

| APN | Assessed Values - 2019-2020 Taxes | | | | | AV/Acre/Land |
|------------|-----------------------------------|-------------|--------------|-------------|-------------|--------------|
| | Acreage | Land | Improvements | Total | Taxes | |
| 189-020-37 | 47.35 | \$975,855 | \$195,042 | \$1,170,897 | \$14,945.56 | \$20,609 |
| 189-020-38 | 16.25 | \$338,409 | \$55,718 | \$394,127 | \$4,907.30 | \$20,825 |
| 189-013-22 | 38.46 | \$726,612 | \$398,131 | \$1,124,743 | \$13,910.20 | \$18,893 |
| 189-013-23 | 6.39 | \$149,286 | \$368,266 | \$517,552 | \$6,347.14 | \$23,362 |
| 189-013-24 | 71.66 | \$1,353,709 | \$129,380 | \$1,483,089 | \$18,790.68 | \$18,891 |
| 189-013-25 | 15.25 | \$298,595 | \$0 | \$298,595 | \$3,995.28 | \$19,580 |
| Totals | 195.36 | \$3,842,466 | \$1,146,537 | \$4,989,003 | \$62,896.16 | \$19,669 |

VALUATION**HIGHEST AND BEST USE**

Highest and Best Use is an important concept in real estate valuation as it represents the premise upon which value is based. As used in this report, *Highest and Best Use* is defined as follows.

“The reasonably probable and legal use of vacant land or an improved property, that is physically possible, appropriately supported, financially feasible, and that results in the highest value. The four criteria the highest and best use must meet are legal permissibility, physical possibility, financial feasibility, and maximum productivity.”²

Highest and best use analysis is used in the appraisal process to identify comparable properties and, where applicable, to determine whether any existing improvements should be retained, renovated, or demolished. The conclusion of highest and best use is determined by social, economic, governmental, and physical forces. The concept addresses the question of legally allowable, physically possible, economically feasible, and maximally productive uses. Potential alternative uses of the property must be considered in the highest and best use analysis.

Once the legally allowable and physically possible uses have been identified, the economic viability of the various uses must be determined. The use is financially feasible if it provides a positive return to the land. The highest and best use is that use that provides the highest overall return.

Legally Permissible: The legally allowable uses of the subject property are governed primarily by regulations set forth in the San Diego County Municipal Code dealing with land use issues, supplemented by requirements set forth in the Valley Center Community Plan. The appraised property is currently zoned to allow a variety of agricultural pursuits and some residential uses by right and other associated uses by special permit. The existing general plan will allow similar uses on minimum two-acre parcels, subject to limitations associated with this land use classification. The General Plan takes precedent when zoning is inconsistent, so four-acre minimum lots are legally allowed on all parcels except for APN 189-013-25 which has a minimum two-acre requirement.

Physically Possible: Any of the legally allowed uses would be physically possible on portions of the land, subject to existing land use restrictions. The land is not constrained by topography, but areas of the property are within the Keys Canyon Creek floodplain, estimated to be about 85 acres. These areas are farmable and with mitigation can likely be developed as the general plan would allow (see discussion under the heading Flood Zone on pages 21 and 22). Public utilities are available to facilitate residential development should that program of land use be proposed.

² *The Dictionary of Real Estate Appraisal*, 5th ed. (Chicago: Appraisal Institute, 2010), p.93

Valley Stream Ranch

Economically Feasible and Maximally Productive Uses: The issue of economic feasibility focuses primarily on supply and demand characteristics of the local market for residential/agricultural use land. A review of the local competitive market area reveals a good number of available unimproved properties within the greater Valley Center market area as shown in the following table.

| Location | Acres | ListPrice | DOMLS | List Date | Price Per Ac |
|----------------------|--------|-------------|-------|------------|--------------|
| 30933 Mesa Crest Rd | 21.27 | \$649,000 | 79 | 4/20/2020 | \$30,512 |
| 31846 Patrick Way | 21.53 | \$796,000 | 569 | 12/17/2018 | \$36,972 |
| Pauma Vista Dr | 21.98 | \$199,000 | 68 | 4/30/2020 | \$9,054 |
| Paradise Mountain Rd | 27.00 | \$1,150,000 | 178 | 1/8/2020 | \$42,593 |
| 00 Old Castle Rd 74 | 32.00 | \$500,000 | 92 | 4/6/2020 | \$15,625 |
| 32413 Lilac Rd | 37.79 | \$239,000 | 250 | 11/1/2019 | \$6,324 |
| Rancho Heights | 38.79 | \$250,000 | 121 | 3/9/2020 | \$6,445 |
| Rancho Heights | 40.59 | \$1,190,000 | 132 | 2/26/2020 | \$29,318 |
| 31076 Mesa Crest Rd | 41.43 | \$599,990 | 275 | 10/4/2019 | \$14,482 |
| 11922 Betsworth Rd | 45.00 | \$2,799,999 | 40 | 5/29/2020 | \$62,222 |
| McNally Rd | 48.04 | \$209,000 | 68 | 4/30/2020 | \$4,351 |
| Vesper Road | 52.00 | \$1,290,000 | 41 | 2/8/2020 | \$24,808 |
| McNally Road | 58.11 | \$299,000 | 68 | 4/30/2020 | \$5,145 |
| Highway 76 | 62.96 | \$875,000 | 236 | 11/6/2019 | \$13,898 |
| 17060 N Mesa Drive | 104.00 | \$595,000 | 509 | 12/20/2018 | \$5,721 |
| Pauma Reservation Rd | 140.00 | \$7,750,000 | 26 | 3/2/2020 | \$55,357 |
| 12363 Betsworth Rd | 198.00 | \$6,875,000 | Years | 12/23/2010 | \$34,722 |
| N Mesa Dr | 239.00 | \$2,300,000 | 496 | 12/20/2018 | \$9,623 |
| Santa Catalina | 263.00 | \$4,000,000 | 296 | 9/16/2019 | \$15,209 |

The data in the table are located throughout Valley Center and Pauma Valley, and they represent the total properties in excess of 20 acres currently being marketed on the local Multiple Listing Service (MLS). The listing at 12363 Betsworth Road is not on the MLS, but it is available. This is not an oversupply per se, but some of the properties have had extended marketing times (DOMLS).

Conclusion: Accordingly, it is our opinion that the likely purchaser of the subject property is an owner-user who would continue the current farming operation on approximately 80 acres. Presently the existing homes and other structures and improvements add significant appeal to the property and while they underutilize the land, they contribute to value. The land could also accommodate a plant nursery operation and at some future date, the existing general plan land use designations allowing minimum two to four acre lots could facilitate subdivision as demand warrants. The southern elevated portions of the land would be an ideal location for future homesites.

METHODOLOGY

The three common valuation approaches in real estate include the Cost Approach, Income Approach, and Sales Comparison Approach. Of these three, the Cost and Sales Comparison Approaches were considered to be the only pertinent valuation methods in the analysis of the subject property. The Cost Approach is useful in estimating the contributory value of the many improvements on the property. The Income Approach may have some application, but an analysis of income and expense information would incorporate the business operation and this appraisal addresses only the real estate. Further, there are limited sales in this market and sales that display economic details are rare. Consequently, data to facilitate this approach is unavailable.

SALES COMPARISON APPROACH – LAND VALUE

The Sales Comparison Approach is based on the premise that market value of a property is directly related to the prices of comparable, competitive properties. It is based on the principal of substitution, wherein the value of a property tends to be set by the price that would be paid to acquire a substitute property of similar utility and desirability.

Market value is estimated by comparing the subject property to similar properties that have sold recently or for which offers to purchase have been made. Listings are also considered where appropriate. This approach is applicable when the market provides reliable data which can be verified from authoritative sources. The comparative analysis focuses on differences in the legal, physical, locational, environmental and economic characteristics of the appraised property and comparable data, as well as the real property rights conveyed, the dates of sale, the motivations of buyers and sellers, and the financing arrangements for each sale transaction, all of which can account for variations in prices. Our research resulted in the discovery of 13 items of data deemed suitable for analysis and summarize in the following chart.

Valley Stream Ranch

| Land Data Summary | | | | | | | | | | | | |
|-------------------|-----------------------------|------------------------------------|---------|----------------------|----------|--------|--------------|--------------|----------------------|------------------|-------------|----------|
| | | Assessor | | Buyer | Date | | | Zone | | Use at Time | Price | |
| No. | Location/APN | Parcel Nos. | Status | Owner/Seller | Doc. No. | Acres | Topography | Gen. Plan | Utilities | of Sale | Price | Per Acre |
| Subject | Valley Center Road | 189-020-37, 38; | NA | NA | NA | 195.36 | Level | A70/RR-2 | El. Power | Assumed | | |
| | Valley Center | 189-013-22, 23, 24, 25 | NA | SOCALTA SA | NA | | Gentle Slope | SR-2, SR-4 | 4 wells | Unimproved | | |
| 1 | Cobb Lane | 189-040-05, 08; 189-031-11 | Expired | NA | Jul-19 | 310.00 | Level | A70-2, SPA | El. Power | 3,000 SF SFR | \$4,700,000 | \$15,161 |
| | Valley Center | 189-030-06, 17; 189-032-18, 21 | Listing | Frank | NA | | Gentle Slope | S88 | 1 Well/7 Wtr. Meters | | | |
| 2 | Cool Valley Ranch Rd. | 133-352-01, 05, 07, 08, 09, 10, 11 | Expired | NA | Jan-16 | 117.42 | Level | A70/RR-2 | El. Power | 3 SFR's, 3 barns | \$6,875,000 | \$58,551 |
| | Valley Center | 133-202-10 | Listing | Bell Holdings LLC | NA | | Gentle Slope | SR-2 | 8 Wells | Others Imps. | | |
| 3 | 12363 Betsworth Rd. | 186-062-02, 20, 21, 22 | Active | NA | NA | 198.00 | Level | A70-2 | El. Power | 2 SFR's, barn | \$6,875,000 | \$34,722 |
| | Valley Center | 186-061-11, 12, 13 | Listing | Fed. Blvd. Prop. LLC | NA | | Gentle Slope | RL-20 | | garage | | |
| 4 | Vesper Rd. | 188-290-11; 188-271-65 | Active | NA | NA | 52.82 | Level | A70-2 | El. Power | Unimproved | \$1,290,000 | \$24,423 |
| | Valley Center | | Listing | Irvine | NA | | Gentle Slope | SR-2 | Muni. Water | | | |
| 5 | Mactan Rd. | 188-082-43 | Sale | Martinez | Jun-20 | 19.57 | Level | A70-2 | El. Power | Unimproved | \$450,000 | \$22,994 |
| | Valley Center | | | Trosic | 0295604 | | Gentle Slope | SR-4 | 1 Well | | | |
| 6 | Cool Valley Rd. | 133-202-02 | Sale | Alfaro/Diaz | Aug-19 | 20.96 | Level | RR-2 | El. Power | Unimproved | \$360,000 | \$17,176 |
| | Valley Center | | | Knapp | 0358899 | | Gentle Slope | SR-2 | Muni. Water | | | |
| 7 | Lake Wohlford Rd. | 190-090-02, 04, 05 | Sale | Esc. Creek Conserv. | Jul-19 | 281.99 | Level to | A70-10, S-80 | None at Property | Unimproved | \$4,200,000 | \$14,894 |
| | Valley Center | 190-100-03 | | John Henry LLC | 0260358 | | Steep | RL-40 | 1 Well | | | |
| 8 | Fruitvale Rd. | 188-271-01, 02 | Sale | Netwig | Jun-19 | 23.40 | Level | A70-2 | El. Power | Unimproved | \$435,000 | \$18,590 |
| | Valley Center | | | Hammond, et al. | 0231025 | | Gentle Slope | SR-2 | Muni. Water | | | |
| 9 | East of Sierra Verde Rd. | 191-180-05, 07, 08 | Sale | County of San Diego | Feb-19 | 250.90 | Gentle, Mod. | A70-4 | El. Power | Unimproved | \$3,000,000 | \$11,957 |
| | Valley Center | | | JP Birdland, et al. | 073261 | | & Steep | RL-20 | Wells | | | |
| 10 | 29471 Cole Grade Rd. | 188-120-49, 50 | Sale | Baywa R E Dev. LLC | Jun-17 | 65.57 | Level | RR-2 | El. Power | Retired | \$1,200,000 | \$18,301 |
| | Valley Center | | | Armstrong | 0273090 | | Gentle Slope | SR-2 | Muni. Water | Citrus Grove | | |
| 11 | 29902 Valley Center Rd. | 188-290-14, 71 | Sale | VC Parks & Rec Dist. | Mar-17 | 28.38 | Level | Open Space | El. Power | Unimproved | \$530,000 | \$18,675 |
| | Valley Center | | | Burkel | 0139586 | | Gentle Slope | S80-2 | Muni. Water | | | |
| 12 | 14532 Cool Valley Ranch Rd. | 133-352-13 | Sale | Lopez | Jun-16 | 39.43 | Level | A70/RR-2 | El. Power | 3,460 SF SFR | \$1,095,000 | \$27,771 |
| | Valley Center | | | Bell Holdings LLC | 0304693 | | Gentle Slope | SR-2 | 4 Wells | | | |
| 13 | 14700 Fruitvale Rd. | 188-151-14, 15 | Sale | Fruitvale Farms | Apr-16 | 35.46 | Level | A70-2 | El. Power | Unimproved | \$850,000 | \$23,971 |
| | Valley Center | | | Chipman | 0148671 | | Gentle Slope | SR-4 | 1 Well | | | |

Discussion of the Data

Comparable No. 1 is located a short distance east of the appraised property on the south side of Valley Center Road at Cobb Lane. This 310 acre property features level to gently rolling topography and an approximate 3,000 square foot residence. Utilities are available including electrical power, phone, municipal water with seven meters (three 3-inch, two 2-inch, and two 3/4-inch), and a 125 GPM water well. Two other wells on the land have been abandoned. The property offers views of the surrounding countryside and the Palomar Mountain range. There are also two residences in disrepair that do not contribute to value. The property has been on the market for an extended period since it was acquired in 2011 from the bank owner for \$1,660,000. It had previously sold in December 2009 for \$4,800,000. It was placed on the market more recently at a price of \$5,300,000 and subsequently dropped to \$4,700,000 which is equivalent to \$15,161 per acre.

Comparable No. 2 is another expired listing involving the former Bell Gardens property and other holdings under the same ownership that total about 117 acres located a short distance north of subject on the east side of Cole Grade Road at Cool Valley Ranch Road. This property came to market on June 25, 2015 at a price of \$7,995,000 and it did not sell. It is comprised of seven legal parcels that were later individually marketed resulting in a couple of sales. Improvements include a 3,460 square foot, three bedroom, three bath residence built in 1984, a 1,500 square foot barn, carport, all located on over 39 acres; a 4,165 square foot, four bedroom, five bath home built in about 1945 for June Allyson and Dick Powell, and designed by Cliff May, and a pool all on 4.47 acres; a 2,147 square foot, three bedroom, three bath home built in 1975 on 2.3 acres; a 2,800 square foot masonry barn with clerestory windows, open beam trusses, 20-foot ceiling at the ridge, office, tasting/event patio and three bathrooms; a 6,600 square foot steel frame barn (formerly the train barn) with high ceilings and two roll-up doors, offices, one bath, and an attached one bedroom, one bath apartment. The property is served by the Valley Center Municipal Water District (VCMWD) and has five water installed water meters. In addition there are eight water wells, two of which have excellent production records. Much of the property has been farmed over the years and that continues today. Three of the seven parcels are unimproved. The former Allyson/Powell property sold in June 2016 for \$650,000, and the 39-acre parcel also sold in June 2016 for \$1,095,000 (see Comparable 10).

Comparable No. 3 consists of six Assessor tax parcels with a combined area of approximately 198 acres located about 2.70 miles west of subject on the south side of Betsworth Road, a short distance west of its intersection with Lilac Road. This property has been on and off the market for years since it was acquired by EDCO Disposal in May 2008 for \$6,099,000. It was put up for sale on December 23, 2010 at a price of \$6,875,000 and it is still on the market at that price. It was formerly the Groot Farm that at one time was viewed as a potential golf course venue. The land is improved with a 3,100 square foot ranch house, a 1,040 square foot caretaker home, a 1,080 square foot office trailer, a 3,136 square foot barn, and a 2,440 square foot equipment garage. The property is in the service area of the VCMWD and has four installed water meters including three 2-inch meters and one 3/4-inch meter, as well as six in-ground water wells with three in current operation for sunflower seed farming. Electrical power and telephone services are also available at the property. The land features level terrain and gentle slopes with

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stands of oaks and some granite rock piles. The advertised potential uses include farming with an existing 100 acres of padded plant areas, estate residential, equestrian, conservation bank, and some institutional uses.

Comparable No. 4 is 1 52.82 acre property located approximately 1.30 miles by road northeast of the appraised property at the northwest corner of Vesper Road and Jana Road. The San Diego County General Plan allows minimum two-acre homesites and this property features physical characteristics that would facilitate such as use. According to the listing agent, a local engineer opined in 2015 that the land could yield 20-24 lots in a relatively easy map process. The sellers own a three-inch water meter that the water district has pulled for lack of use, but it could be used as a sizeable credit toward ¾-inch residential meters if the property is subdivided. The land was originally listed for sale on May 31, 2018 at a price of \$1,599,000 and that listing expired on January 21, 2020. It was again listed, this time on February 8, 2020 at the lower price of \$1,290,000. An escrow failed and the property is still in the market at the same price. Electrical power and telephone are available in the area.

Comparable No. 5 is a 19.57 acre level parcel of undeveloped land located a short distance east of subject at the northeast corner of Valley Center Road and Mactan Road. Electrical power and telephone services are available at the property. The land is located within the service area boundaries of the VCMWD, and while water from this source is currently available, an onsite water well is used to irrigate the flowers being grown. The site was brought to market on April 24, 2020 and it closed escrow on June 9, 2020 at the asking price of \$450,000, all cash to the seller. The buyer owns the adjacent 19.52 acre parcel at the southeast corner of Vesper Road and Mactan Road.

Comparable No. 6 involves a single legal elongated level parcel of 20.96 acres that has 396 feet of frontage on Cole Grade Road and over 2,600 feet of frontage along Cool Valley Road. The site sets slightly below street grade and an open space easement with a seasonal creek extends the length of the north property boundary which is an area heavily vegetated with mature trees. It is also encumbered with a flowage easement. There is some interesting history associated with this site as it at one time had a short airstrip that is featured in the local museum. The site was listed on May 31, 2019 for \$374,000, and it sold in 53 days for \$360,000, all cash to the seller. A nine lot subdivision had recently been proposed for the site, but the buyer plans a container nursery. Public utilities are available at the site. The County ISRP shows onsite vegetation to be grassland and other woodlands.

Comparable No. 7 is a 281.99 acre property located in an unincorporated area of North San Diego County, just to the northeast of the City of Escondido corporate limits at 25320 Lake Wohlford Road, approximately 8.20 miles by road south of subject. It is within the North County Metropolitan Community Planning Area, and the Escondido Sphere of Influence. The land has very limited frontage on Lake Wohlford Road at the southeasterly corner of the property. At this location, Lake Wohlford Road is a two-lane, asphalt paved, County maintained roadway that meanders eastward from Valley Center Road. The land is characterized by topography that varies from level and gently sloping to steep, rugged, and mountainous. Site elevations range from about 900 feet above mean sea level near the southwesterly corner of the property to approximately 1,630 feet above mean sea level at the top of a peak at the east side of

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the land. A stretch of Escondido Creek, a blue line stream, flows through the southwest segment of the property.

The property is not served by any public utilities, although electrical power lines are in Lake Wohlford Road. There is a well in place on the site, and a generator provides electrical power. Sewage disposal needs for area properties are currently met by the use of onsite septic systems, but no systems have been installed on the property. Access to public water and sewer services would require annexation into water and sewer districts.

The land is within the North County Subarea of the MSCP, and it is entirely within a PAMA. According to the County of San Diego ISRP the land is mostly covered with southern mixed chaparral and dense Engelmann oak woodland, along with small amounts of Diegan coastal sage scrub, non-native grassland, coast live oak woodland, eucalyptus woodland, and minor patches of other habitat. It is located within the North County Habitat Evaluation Map and is rated as having very high habitat value.

The property was offered for sale on the open market in March 2015 at an asking price of \$4,300,000, and the seller ultimately agreed to sell the land to The Escondido Creek Conservancy for \$4,200,000 all cash in the first part of 2016. We were informed that the owners received interest to purchase the property from three potential buyers between about 2011 and 2015 who considered residential development of the site. The offered prices were not disclosed and, in each case, the buyers declined to complete the purchase as projected on and offsite costs were viewed to be too excessive to support economically feasible development.

There are some miscellaneous improvements on the land associated with a paintball operation that was allowed pursuant to a Use Permit and via a lease that expired at the end of February 2019. The paintball improvements are comprised of some sheds, shade structures, fencing, and other features that do not contribute to value. The buyer plans to remove these improvements and restore the land to its natural state.

Comparable No. 8 consists of two adjacent parcels with a combined area of 23.40 acres located on the south side of Fruitvale Road, a short distance east of Cole Grade Road. This property had been on and off the market since 2010 at prices up to \$800,000 as recently as 2016. The most recent listing is dated June 29, 2018 at a price of \$500,000. After a marketing time of 271 days, the property sold for \$435,000, all cash to the seller. This property is relatively flat and has a small wetlands area and some oak trees along the west boundary. The intended use is unknown, but the listing agent suggests subdivision potential in accordance with the two acre zoning. Public utilities are available at the site. The County of San Diego Initial Study Research Packet (ISRP) shows onsite vegetation includes grassland, coastal sage scrub and other woodlands.

Comparable No. 9 has been marketed periodically since 2007, when the property was offered at \$4,900,000. In 2008 the list price was reduced to \$4,650,000, and then in 2009 it was further reduced to \$3,900,000. It is located about 7.50 miles southeast of subject in the Paradise Mountain area. The County of San Diego purchased the property for preservation at a price of \$3,000,000 in February 2019, based on a local appraisal. Terms of sale were all cash to the seller. At one time a 32-lot project was plotted on this land, but did not gain County approval.

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Datum No. 9 is within an identified PAMA in the draft North County Subarea Plan MSCP. About 30% of the topography exceeds 25% slope, and elevation ranges from 1,900 feet in the northeast portion of the land to 2,200 feet near the western boundary. Most of the land is characterized by rolling and gently sloping terrain. Access is via the privately maintained (60-foot wide, dirt) Sierra Verde Road, that extends east from Kiavo Drive.

Comparable No. 10 involves two adjacent parcels with a combined area of 65.57 acres located on the east side of Cole Grade Road between Fruitvale Road and Miller Road. The site of a former citrus grove, a 23.43 acre portion of this property has been converted to a solar energy generating facility with a production capacity of approximately 2.5 megawatts. The use is allowed by a major use permit (MUP), the application for which was begun in October 2013 under the project name NLP Valley Center Solar. It is our understanding that the buyer paid for all of the entitlement processing for the MUP, but the land price was based on a large lot residential highest and best use. These parcels were formerly 188-120-09 and 10. They were on the market during 2012-2013 for a combined price of \$1,500,000. Former parcel 09 has an installed water meter and 10 has an installed water meter, well and old single family residence. Electrical power is available to both parcels. The land sold for \$1,200,000, closing on June 16, 2017. The seller was cashed out in this transaction.

Comparable No. 11 is a part of the Star Valley Ranch acquisition by the County of San Diego on March 28, 2017 and consists of two adjacent parcels that total 28.38 acres that are located a short distance east of subject. No listing details were available for the property, but this segment sold for \$530,000 all cash to the seller. This is equivalent to \$18,675 per acre. On March 17, 2015, the County acquired the other component of the park for a price of \$300,000 which equates to approximately \$19,231 for the 15.60 acre parcel. This was also an all cash transaction. The irregular shaped holding extends from Valley Center Road back to Vesper Road. The property is improved with a very old single family residence and a number of shade houses for agricultural use. These improvements did not contribute to value as the County is planning a multi-use park on the acreage.

Comparable No. 12 involves 39.43 acres of land located 3.80 miles north of subject within the gated Cool Water Ranch Estates development on the east side of Cole Grade Road, just north of Cool Valley Road. This is a component of expired listing Comparable No. 2. The land has been farmed over the years which continues to this day. The asking price is not known, but the property sold on June 20, 2016 for \$1,095,000 all cash to the seller. The land is within the service area of the VCMWD and it takes water for domestic use from this entity, while crops are watered through a series of wells. Improvements include a good quality 3,460 square foot single family residence, an attached three-car garage and a 1,500 square foot barn. A significant portion of the property is encumbered with open space easements.

Comparable No. 13 is two adjacent parcels that total 35.46 acres located on the north side of Fruitvale Road, a short distance east of Cole Grade Road, two miles north of the appraised property. This property was listed for \$1,200,000 on September 30, 2013 and it sold after a marketing time of 886 days for \$850,000 with a \$450,000 cash down payment and seller carry back for the balance at market terms. At the time of sale the property was leased for agricultural use at the rate of \$20,000 per year. The land is flat and 100 percent usable. Utilities

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are available at the site including a two-inch water meter. The land is zoned to allow minimum two acre parcels and the general plan designation allows minimum four acre sites. The most restrictive prevails in most instances. The property was advertised as a potential subdivision site for 24-28 lots. The seller in 2007 had proposed a 96-lot subdivision that was not approved. The buyer has developed a commercial agricultural business with multiple hot house type buildings and is operating as Western Cactus Enterprises.

Elements of Comparison/Analysis of Data

We have conducted a qualitative analysis addressing relative differences between the subject and each item of data. The selected elements of comparison are discussed below and set forth in the exhibits on page 40. An equal sign signifies that for that particular item, the comparable and the subject are considered to be similar overall. A plus sign indicates that the subject is judged superior to the comparable for that element of comparison and a minus sign suggests that the comparable is superior to subject for that item.

Property Rights Conveyed: All of the data involved the transfer of the fee simple estate, with no adjustments needed.

Financing Terms: Financing was not a factor for any of the sold comparables considered in this analysis as the seller was cashed out in each transaction. Consequently, no adjustments were made for financing terms.

Conditions of Sale: Adjustments for conditions of sale usually reflect the motivation of the buyer and the seller. The definition of market value requires that buyers and sellers be typically motivated and not unusually motivated to buy or sell. The purchase of each sold property was reportedly negotiated in good faith, and represented an “arms-length” transaction; consequently no adjustments were warranted.

Market Conditions: The local market area has seen very few sales over the last several years involving properties with the unique characteristics of subject such as its location, size and proximity to the Valley Center Industrial area. Consequently, it is difficult to isolate market pricing and value trends for this type of property. In an effort to gain some insight into this matter, we conducted two studies. The first one was a year over year comparison of average and median selling prices for lots and land within the time period January 2017 to July 15 2020. The results are shown in the table below.

| Market Trends Analysis - Lots/Land - MLS Data - 01/01/2016 - 07/15/2020 | | | | | |
|--|-----------------|-------------------------|-----------------|--------------------------|-----------------|
| Zip Code | No. Sold | Avg. Sales Price | % Change | Avg. Median Price | % Change |
| 92082 | | | | | |
| 2020 YTD | 13 | \$255,711 | 8.07% | \$205,000 | 10.07% |
| 2019 | 34 | \$236,614 | -2.59% | \$186,250 | 20.94% |
| 2018 | 44 | \$242,911 | -13.19% | \$154,000 | -9.41% |
| 2017 | 49 | \$279,830 | | \$170,000 | |

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The second analysis was a study of lot and land sales throughout north San Diego County that have sold and resold during the period January 2015 to April 2020. The results are shown below.

| Summary of Results | |
|---|----------------|
| | All Properties |
| No. of Resales of the Same Property | 23 |
| Average Annual Rate of Price Appreciation | 4.72% |
| Median Annual Rate of Price Appreciation | 2.61% |

The first chart above is a summary of land sales in the greater Valley Center area over a three plus year time span. The data shows only one year where prices increased on an average price basis and two years on a median price basis. There is a big spread in lot sizes and land use, making this data difficult to support a trend in pricing. The second table involves the sale and resale of the same property sometimes more than once during the study period. There is quite a spread between the average and the median caused partly by the variance in the individual indicators. In our view the data in the second table are more meaningful and we have concluded that an average annual rate of appreciation for the time period represented by the sales data is 2.50 percent per year, below the averages, but in consideration of the magnitude of the appraised property.

Location and Access: The adjustments in this category recognize differences between the data and the subject with regard to benefits and/or desirability of the properties associated with location, as well as legal and physical access. All of the comparables with the exception of Sale 12 were rated similar overall for this element of comparison. Sale 12 is in the Cool Valley Ranch Estates area and is rated superior to subject for location.

Parcel Size/Shape: As to size and shape, the typical real estate market responds to size differences due to supply and demand factors that can result in a larger pool of potential buyers for smaller properties because of the comparatively lower total financial commitment involved. The result is that smaller properties commonly attract a greater per acre price than larger parcels of similar use potential. Accordingly, Sales 4, 5, 6, 8, and 10 through 13 were all rated superior to subject for parcel size as they range from 19.57 to 65.57 acres. Sales 7 and 9 were rated inferior as they are much larger.

Topography/View: The subject is relatively flat over most of its terrain and enjoys a low level area view. Some of the comparables enjoy superior views, but have inferior topography. Sales 7 and 9 were rated inferior for topography warranting upward adjustment (plus sign).

Improvements: Only Sale 12 has any improvements that contributed to value and in this case, substantial value. Accordingly, since the goal of this analysis is

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land value only, it was rated superior to the appraised property for this element of comparison. All the other comparables were rated similar.

Availability of Utilities: This element of comparison can have significant influence on property value depending upon its highest and best use and near term development potential. The subject property has electrical power, four wells and three active water meters installed from the VCMWD. All of the comparables except Sales 5 and 12 were rated inferior to subject for this element of comparison.

Land Use Potential: The subject comprises 195.36 acres in seven Assessor tax parcels. The legality of each of these parcels has not been determined since we have not reviewed a title report for the property. To be legal, these individual parcels would have had to be created by parcel map or some other means prior to implementation of the 1972 subdivision map act. In consideration of the subject's land use potential, we have reviewed the limitation on parcel size as summarized in the following chart.

| APN | Acreage | Zone | Gen Plan |
|------------|---------|----------|----------|
| 189-020-37 | 47.35 | A70-2 | SR-4 |
| 189-020-38 | 16.25 | A70-2 | SR-4 |
| 189-013-22 | 38.46 | A70/RR-2 | SR-4 |
| 189-013-23 | 6.39 | A70-2 | SR-4 |
| 189-013-24 | 71.66 | A70-2 | SR-4 |
| 189-013-25 | 15.25 | RR-2 | SR-2 |
| Totals | 195.36 | | |

As noted previously, the general plan takes precedence over zoning when the two are in conflict, so the minimum parcel size over most of the subject property is four acres with a minimum of two acres permitted on APN 189-013-25. Theoretically, this could result in a lot yield of approximately 52 or 53 lots upon subdivision to residential homesites, subject to physical constraints associated primarily with the existing floodplain that crosses a portion of the property. This alone will not preclude development as the county has criteria for building in floodplains. A review of the market data suggests that Sales 4, 5, 8, and 10 through 13 are superior to subject in this regard and were rated accordingly.

A summary of our comparative analysis for the appraised property is found in the following exhibits.

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| Summary of Adjustment Analysis | | | | | | |
|--|-----------------|--------------|-------------|---------------|---------------|-----------|
| Datum No. | Subject | 4 | 5 | 6 | 7 | 8 |
| Location | Valley Center | Vesper | Mactan | Cool Valley | Lake Wohlford | Fruitvale |
| | Road | Road | Road | Road | Road | Road |
| Price | NA | \$1,290,000 | \$450,000 | \$360,000 | \$4,200,000 | \$435,000 |
| Date of Sale/Listing | | Current | Jun-20 | Aug-19 | Jul-19 | Jun-19 |
| Size (Acres) | 195.36 | 52.82 | 19.57 | 20.96 | 281.99 | 23.40 |
| Price Per Acre | | \$24,423 | \$22,994 | \$17,176 | \$14,894 | \$18,590 |
| Transaction Adjustments | | | | | | |
| Market Conditions | Fee Simple | 0.00% | 0.27% | 2.69% | 3.13% | 12.35% |
| Adjusted Indicator | Cash Equiv. | \$24,423 | \$23,056 | \$17,638 | \$15,360 | \$20,886 |
| Conditions of Sale | Arm's Length | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| Property Rights Conveyed | Stable | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| Financing Terms | | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| Property Features Comparison | | | | | | |
| Location/Access | Average | = | = | = | = | = |
| Parcel Size/Shape | Good | - | - | - | + | - |
| Topography/View | Average/Average | = | = | = | + | = |
| Improvements | Not Included | = | = | = | = | = |
| Availability of Utilities | At the Property | + | = | + | + | + |
| Land Use Potential | Res./Ag | - | - | = | + | - |
| Overall Comparison to Subject Property | | Superior | Superior | Inferior | Inferior | Superior |
| | | Less than | Less than | More than | More than | Less than |
| Indicated Value Per Acre | | \$24,423 | \$23,056 | \$17,638 | \$15,360 | \$20,886 |
| Summary of Adjustment Analysis | | | | | | |
| Datum No. | Subject | 9 | 10 | 11 | 12 | 13 |
| Location | Valley Center | E. of Sierra | Cole Grade | Valley Center | Cool Valley | Fruitvale |
| | Road | Villa Road | Road | Road | Ranch Road | Road |
| Price | NA | \$3,000,000 | \$1,200,000 | \$530,000 | \$1,095,000 | \$850,000 |
| Date of Sale/Listing | | Feb-19 | Jun-17 | Mar-17 | Jun-16 | Apr-16 |
| Size (Acres) | 195.36 | 250.90 | 65.57 | 28.38 | 39.43 | 35.46 |
| Price Per Acre | | \$11,957 | \$18,301 | \$18,675 | \$27,771 | \$23,971 |
| Transaction Adjustments | | | | | | |
| Market Conditions | Fee Simple | 4.16% | 13.02% | 10.01% | 12.35% | 13.02% |
| Adjusted Indicator | Cash Equiv. | \$12,454 | \$20,684 | \$20,545 | \$31,200 | \$27,092 |
| Conditions of Sale | Arm's Length | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| Property Rights Conveyed | Stable | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| Financing Terms | | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| Property Features Comparison | | | | | | |
| Location/Access | Average | = | = | = | - | = |
| Parcel Size/Shape | Good | + | - | - | - | - |
| Topography/View | Average/Average | + | = | = | = | = |
| Improvements | Not Included | = | = | = | - | = |
| Availability of Utilities | At the Property | + | + | + | = | + |
| Land Use Potential | Res./Ag | + | - | - | - | - |
| Overall Comparison to Subject Property | | Inferior | Superior | Superior | Superior | Superior |
| | | More than | Less than | Less than | Less than | Less than |
| Indicated Value Per Acre | | \$12,454 | \$20,684 | \$20,545 | \$31,200 | \$27,092 |

CONCLUSION OF MARKET LAND VALUE

After our initial analysis of the data, each item was rated based on its perceived relevance as an indicator of value for the subject property. This bracketing process is justified due to the relatively wide range of indicators and the capriciousness of the local land market. The bracketing analysis is summarized in the following chart.

| Bracketing Analysis | | | |
|----------------------------|---------|---------------|----------|
| Datum | Size | Overall | Price |
| No. | (Acres) | Comparability | Per Acre |
| 9 | 250.90 | Inferior | \$12,454 |
| 7 | 281.99 | Inferior | \$15,360 |
| Subject | 195.36 | | \$17,500 |
| 6 | 20.96 | Superior | \$17,638 |
| 11 | 28.38 | Superior | \$20,545 |
| 10 | 65.57 | Superior | \$20,684 |
| 8 | 23.40 | Superior | \$20,886 |
| 5 | 19.57 | Superior | \$23,056 |
| 4 | 52.82 | Superior | \$24,423 |
| 13 | 35.46 | Superior | \$27,092 |
| 12 | 39.43 | Superior | \$31,200 |

The indicators indicate a range of values from a low of \$12,454 per acre to a high of \$31,200 per acre. The average of the indicators is \$19,370 per acre, and the median is \$18,590 per acre. Given the overall attributes of subject in relation to the comparables, it is our opinion that the value of the property should be somewhere between \$17,000 and roughly \$18,000 per acre overall. Accordingly, based on the overall physical and legal characteristics of the subject property, it is our opinion that the market value of the land component is as shown in the following calculation.

$$\begin{array}{rclcl}
 195.36 \text{ Acres} & \times & \$17,500 \text{ Per Acre} & = & \$3,418,800 \\
 & & \text{Rounded} & & \$3,419,000
 \end{array}$$

CONTRIBUTORY VALUE OF THE IMPROVEMENTS

There are no sales of properties with improvements on the scale of those found at the subject property; consequently, direct comparison of the improved property with other improved sale properties is not possible. Alternatively, the contributory depreciated value of the subject improvements has been estimated based on replacement cost figures found in the Marshall & Swift *Marshall Valuation Service* cost manual. This company is a recognized leader in providing reliable cost data for all types of property and improvements. Appraisers routinely use

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this service when applying a Cost Approach to their analysis. The summary of this procedure as it applies to the appraised property follows.

| Reproduction Cost Estimate | | | | | | | |
|---|----------|----|------|----------|---|-------------|---------------|
| Valley Stream Ranch Improvements | | | | | | | |
| Main Residence | 2,314 | SF | x | \$250.00 | = | \$578,500 | |
| Guest House #1 by Main House | 520 | SF | x | \$225.00 | = | \$117,000 | |
| Guest House #2 Red House | 780 | SF | x | \$225.00 | = | \$175,500 | |
| Guest House #3 by Tennis Court | 674 | SF | x | \$225.00 | = | \$151,650 | |
| Pool House/Garage | 400 | SF | x | \$200.00 | = | \$80,000 | |
| Junes House | 1,603 | SF | x | \$225.00 | = | \$360,675 | |
| Carport at Junes House | 400 | SF | x | \$30.00 | = | \$12,000 | |
| Foremans House | 1,536 | SF | x | \$215.00 | = | \$330,240 | |
| Rental House | 1,258 | SF | x | \$215.00 | = | \$270,470 | |
| Shed | 156 | SF | x | \$25.00 | = | \$3,900 | |
| Garages/Break Room | 5,260 | SF | x | \$50.00 | = | \$263,000 | |
| Metal Workshop/Office | 4,200 | SF | x | \$35.00 | = | \$147,000 | |
| Warehouse | 3,950 | SF | x | \$50.00 | = | \$197,500 | |
| Pools and Tennis Court | | | | Lump Sum | | \$150,000 | |
| Utility Systems/Wells | | | | Lump Sum | | \$120,000 | |
| Landscaping/Bridge/Stream/Misc. | | | | Lump Sum | | \$350,000 | |
| Total Reproduction Cost Estimate | | | | | | | \$3,307,435 |
| | | | | | | | |
| Depreciation Estimate | | | | | | | |
| Valley Stream Ranch Improvements | | | | | | | |
| Total Reproduction Cost Estimate | | | | | | | \$3,307,435 |
| Depreciation | | | | | | | |
| Main Residence | Eff. Age | 10 | Yrs. | 16.67% | = | (\$96,417) | |
| Guest House #1 by Main House | Eff. Age | 10 | Yrs. | 16.67% | = | (\$19,500) | |
| Guest House #2 Red House | Eff. Age | 10 | Yrs. | 16.67% | = | (\$29,250) | |
| Guest House #3 by Tennis Court | Eff. Age | 15 | Yrs. | 25.00% | = | (\$37,913) | |
| Pool House/Garage | Eff. Age | 15 | Yrs. | 25.00% | = | (\$20,000) | |
| Junes House | Eff. Age | 30 | Yrs. | 50.00% | = | (\$180,338) | |
| Carport | Eff. Age | 30 | Yrs. | 50.00% | = | (\$6,000) | |
| Foremans House | Eff. Age | 40 | Yrs. | 66.67% | = | (\$220,160) | |
| Rental House | Eff. Age | 40 | Yrs. | 66.67% | = | (\$180,313) | |
| Shed | Eff. Age | 40 | Yrs. | 66.67% | = | (\$2,600) | |
| Garages | Eff. Age | 10 | Yrs. | 16.67% | = | (\$43,833) | |
| Workshop/Office | Eff. Age | 40 | Yrs. | 66.67% | = | (\$98,000) | |
| Warehouse | Eff. Age | 30 | Yrs. | 50.00% | = | (\$98,750) | |
| Pools and Tennis Court | Eff. Age | 10 | Yrs. | 16.67% | = | (\$25,000) | |
| Utility Systems/Wells | Eff. Age | 20 | Yrs. | 33.33% | = | (\$40,000) | |
| Landscaping/Bridge/Stream/Misc. | Eff. Age | 20 | Yrs. | 33.33% | = | (\$116,667) | |
| Total Depreciation | | | | | | | (\$1,214,740) |
| Depreciated Reproduction Cost | | | | | | | \$2,092,695 |

CONCLUSION OF MARKET VALUE AS IS

The estimated market value of the subject property before construction and operation of the battery storage facility on the adjacent property is as shown below.

| | |
|--------------------------------|--------------------|
| Land Value | \$3,419,000 |
| Contributory Improvement Value | <u>\$2,100,000</u> |
| Total | \$5,519,000 |

ESTIMATED EXPOSURE TIME

The value estimate reflects a reasonable exposure time estimated at between six months and one year for the subject property. According to the Uniform Standards of Professional Appraisal Practice, Exposure Time is defined as the estimated length of time the property interest being appraised would have been offered on the market prior to the hypothetical consummation of a sale at market value on the effective date of the appraisal; a retrospective estimate based upon an analysis of past events assuming a competitive and open market.

POTENTIAL INFLUENCE FROM THE PROPOSED BATTERY STORAGE FACILITY

Battery storage facilities like the one proposed adjacent to the appraised property are typically built in industrial areas near electrical power substations. We know of no such facilities recently developed in residential/agricultural areas on land with residential use potential similar to that of the subject property. Consequently, directly comparable situations have not been discovered that would provide some indication of the influence these facilities may have on market value. Since our research suggests that concerns relating to large scale battery storage facilities deal primarily with potential health hazards and visual character, we have investigated what is considered to be an analogous situation – high voltage power transmissions lines and appurtenances. Potential damages typically associated with these type of projects relate to: 1) the perception of possible health effects from electric or magnetic fields (EMF); 2) the potential noise and visual unattractiveness of the transmission line(s); 3) the proximity of existing improvements to the project facilities and any additional facilities that could be built within the foreseeable future; and 4) the potential interference with future land uses.

While there is still significant debate about the effects of EMF on health, it is recognized that people's concerns about this issue can influence their decisions related to the purchase of property. In terms of market value, courts have generally held that whether the danger of EMF is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact. The visual profile of transmission line structures and wires can also decrease the perceived aesthetic quality of property. These conclusions have been cited in several court cases and legal opinions.

In our opinion, potential damages to a specific property must consider the above noted issues, as well as the market in which the properties compete and market conditions prevalent at the time of appraisal. The subject property is rural in character and buyers typically locate to these areas to get away from the more hectic urban environment found in most cities. While electrical transmission corridors are a typical sight in many neighborhoods, they nevertheless are

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usually considered detrimental to property value. We have discussed this issue with real estate agents who typically suggested that major electrical transmission corridors improved with power lines and lattice towers adversely impact value. However, while this sentiment is universal among those interviewed, they were not clear just how to quantify the extent of this impact. On the other hand, our research shows that people will live next to these corridors; albeit sometimes not by choice. For example, consider the following photos.



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These are just a few representations of property proximate to transmission line corridors and improvements. They are not meant to suggest acceptability of this proximity without some possible corresponding influence on property value. In an effort to measure any potential impact, we have conducted a couple of studies; one is a paired sales analysis of improved residential properties and the second is an analysis of land sales. The following are summaries of the first analysis.

| Paired Sales Analysis - Improved Residential - Vista Rodeo Drive | | | | | | | | | |
|--|------------------|------------------|-----------|------------------|-------------|------------------|------------|------------------|-------------|
| ITEM | Index Sale | Comparable | No. 1 | Comparable | No. 2 | Comparable | No. 3 | Comparable | No. 4 |
| Address | 2515 Vista Rodeo | 2588 Vista Rodeo | | 2549 Vista Rodeo | | 2597 Vista Rodeo | | 2573 Vista Rodeo | |
| Sales Price | \$545,000 | \$545,000 | | \$583,500 | | \$630,000 | | \$640,500 | |
| Price/Living Area S.F. | \$156.52 | \$156.52 | | \$167.58 | | \$149.96 | | \$152.46 | |
| VALUE ADJUSTMENTS | DESCRIPTION | DESCRIPTION | +(-) | DESCRIPTION | +(-) | DESCRIPTION | +(-) | DESCRIPTION | +(-) |
| Sales or Financing Concessions | | Conventional | | Conventional | | Conventional | | Conventional | |
| Date of Sale | 2/28/02 | 6/10/02 | | 1/31/01 | 29,175 | 10/3/01 | | 8/13/01 | 16,013 |
| Location Quality | Good | Similar | | Similar | | Similar | | Similar | |
| Site Size (Acres) | 4.08 | 3.27 | | 1.24 | 58,350 | 1.78 | 63,000 | 1.00 | 64,050 |
| View | Very Good | Similar | | Similar | | Similar | | Similar | |
| Design & Appeal | Good | Similar | | Similar | | Similar | | Similar | |
| Construction Quality | Good | Similar | | Similar | | Similar | | Similar | |
| Age & Condition | 2001/New | 2001/New | | 2001/New | | 2001/New | | 2001/New | |
| Bdms/Baths | 4/3.5 | 4/3.5 | | 4/3.5 | | 5/4.5 | | 5/4.5 | |
| Gross Living Area | 3,482 | 3,482 | | 3,482 | | 4,201 | (53,925) | 4,201 | (53,925) |
| Functional Utility | Good/2 Sty | Similar | | Similar | | Similar | | Similar | |
| Heating/Cooling | Central FA | Similar | | Similar | | Similar | | Similar | |
| Garage/Carport | 3 Car Gar. | Similar | | Similar | | Similar | | Similar | |
| Patios, Porches, Pools etc. | Good | Similar | | Similar | | Similar | | Similar | |
| Miscellaneous | NA | Similar | | Similar | | Similar | | Similar | |
| Other (kitchen equip., extras) | Average | Similar | | Similar | | Similar | | Similar | |
| NET ADJUSTMENT | | | \$0 | | \$87,525 | | \$9,075 | | \$26,138 |
| ADJUSTED PRICE OF COMPARABLE | | | \$545,000 | | \$671,025 | | \$639,075 | | \$666,638 |
| PRICE OF INDEX SALE | | | \$545,000 | | \$545,000 | | \$545,000 | | \$545,000 |
| DIFFERENCE | | | \$0 | | (\$126,025) | | (\$94,075) | | (\$121,638) |
| PERCENT DIFFERENCE | | | 0.00% | | -23.12% | | -17.26% | | -22.32% |
| AVERAGE DIFFERENCE | -15.68% | | | | | | | | |

| Paired Sales Analysis - Improved Residential - Tiffany Park | | | | | | | | | |
|---|-------------------|-------------------|------------|-------------------|------------|------------------|------------|-------------------|------------|
| ITEM | Index Sale | Comparable | No. 1 | Comparable | No. 2 | Comparable | No. 3 | Comparable | No. 4 |
| Address | 9369 Tiffany Park | 9262 Pinkard Lane | | 9227 Pinkard Lane | | 9335 Ashley View | | 9330 Tiffany Park | |
| Sales Price | \$365,000 | \$395,500 | | \$398,500 | | \$391,000 | | \$390,000 | |
| Price/Living Area S.F. | \$147.95 | \$160.32 | | \$161.53 | | \$158.49 | | \$158.09 | |
| VALUE ADJUSTMENTS | DESCRIPTION | DESCRIPTION | +(-) | DESCRIPTION | +(-) | DESCRIPTION | +(-) | DESCRIPTION | +(-) |
| Sales or Financing Concessions | | Conventional | | Conventional | | Conventional | | Conventional | |
| Date of Sale | 7/28/03 | 7/8/03 | | 7/10/03 | | 7/7/03 | | 6/5/03 | 9,750 |
| Location Quality | Good | Good | | Good | | Good | | Good | |
| Site Size (SF) | 16,666 | 14,730 | | 9,328 | 39,850 | 10,342 | 39,100 | 8,518 | 39,000 |
| View | None | None | | None | | None | | None | |
| Design & Appeal | Good | Good | | Good | | Good | | Good | |
| Construction Quality | Good | Good | | Good | | Good | | Good | |
| Age & Condition | 2003/New | 2003/New | | 2003/New | | 2003/New | | 2003/New | |
| Bdms/Baths | 4/2.5 | 4/2.5 | | 4/2.5 | | 4/2.5 | | 4/2.5 | |
| Gross Living Area | 2,467 | 2,467 | | 2,467 | | 2,467 | | 2,467 | |
| Functional Utility | Good/2 Sty | Good/2 Sty | | Good/2 Sty | | Good/2 Sty | | Good/2 Sty | |
| Heating/Cooling | Central FA | Central FA | | Central FA | | Central FA | | Central FA | |
| Garage/Carport | 2 Car Gar. | 2 Car Gar. | | 2 Car Gar. | | 2 Car Gar. | | 2 Car Gar. | |
| Patios, Porches, Pools etc. | Good | Good | | Good | | Good | | Good | |
| Miscellaneous | NA | NA | | NA | | NA | | NA | |
| Other (kitchen equip., extras) | Average | Average | | Average | | Average | | Average | |
| NET ADJUSTMENT | | | \$0 | | \$39,850 | | \$39,100 | | \$48,750 |
| ADJUSTED PRICE OF COMPARABLE | | | \$395,500 | | \$438,350 | | \$430,100 | | \$438,750 |
| PRICE OF INDEX SALE | | | \$365,000 | | \$365,000 | | \$365,000 | | \$365,000 |
| DIFFERENCE | | | (\$30,500) | | (\$73,350) | | (\$65,100) | | (\$73,750) |
| PERCENT DIFFERENCE | | | -8.36% | | -20.10% | | -17.84% | | -20.21% |
| AVERAGE DIFFERENCE | -16.62% | | | | | | | | |

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| Paired Sales Analysis - Improved Residential - Jamacha View Drive | | | | | | |
|---|---|-------------------|---|-------------------|----------------|----------------------|
| ITEM | [| Index Sale |] | Comparable | No. 1 | : Comparable No. 2 : |
| Address | [| 3052 Jamacha View |] | 3003 Jamacha View | : | 3105 Jamacha View : |
| Sales Price | [| \$737,500 |] | | : \$725,000 : | : \$737,500 : |
| Price/Living Area S.F. | [| \$267.21 |] | \$284.76 | : : | \$273.55 : : |
| VALUE ADJUSTMENTS | [| DESCRIPTION |] | DESCRIPTION | +(-) | : DESCRIPTION +(-) : |
| Sales or Financing Concessions | [| |] | Conventional | : | Conventional : |
| Date of Sale | [| 5/16/05 |] | 12/29/05 | : | 3/29/07 : 73,750 : |
| Location Quality | [| Good |] | Similar | : | Similar : |
| Site Size (SF) | [| 10,000 |] | 12,197 | : (14,500) : | 10,454 : |
| View | [| Good |] | Similar | : | Similar : |
| Design & Appeal | [| Good |] | Similar | : | Similar : |
| Construction Quality | [| Good |] | SI Inferior | : 72,500 : | SI Inferior : |
| Age & Condition | [| 1990/Good |] | 1990/Good | : | 1990/Good : |
| Bdrms/Baths | [| 4/2.5 |] | 4/2.5 | : | 5/3 : (5,000) : |
| Gross Living Area | [| 2,760 |] | 2,546 | : 16,050 : | 2,696 : 4,800 : |
| Functional Utility | [| Good/2 Sty |] | Similar | : | Similar : |
| Heating/Cooling | [| Central FA |] | Similar | : | Similar : |
| Garage/Carport | [| 3 Car Gar. |] | Similar | : | Similar : |
| Patios, Porches, Pools etc. | [| Good |] | Similar | : | Similar : |
| Miscellaneous | [| NA |] | Similar | : | Similar : |
| Other (kitchen equip., extras) | [| Average |] | Similar | : | Similar : |
| NET ADJUSTMENT | [| |] | | : \$74,050 : | : \$73,550 : |
| ADJUSTED PRICE OF COMPARABLE | [| |] | | : \$799,050 : | : \$811,050 : |
| PRICE OF INDEX SALE | [| |] | | : \$737,500 : | : \$737,500 : |
| DIFFERENCE | [| |] | | : (\$61,550) : | : (\$73,550) : |
| PERCENT DIFFERENCE | [| |] | | : -8.35% : | : -9.97% : |
| AVERAGE DIFFERENCE | [| -9.16% |] | | : | : |

| Paired Sales Analysis - Improved Residential - Caroway Ct. | | | | | | |
|--|---|------------------|---|-------------------|----------------|---------------------------------|
| ITEM | [| Index Sale |] | Comparable | No. 1 | : Comparable No. 2 : |
| Address | [| 3501 Caroway Ct. |] | 2852 Windward Way | : | 3426 Heatherwood Dr. : |
| Sales Price | [| \$775,000 |] | | : \$750,000 : | : \$875,000 : |
| Price/Living Area S.F. | [| \$187.11 |] | \$220.59 | : : | \$226.68 : : |
| VALUE ADJUSTMENTS | [| DESCRIPTION |] | DESCRIPTION | +(-) | : DESCRIPTION +(-) : |
| Sales or Financing Concessions | [| |] | Conventional | : | Conventional : |
| Date of Sale | [| 8/28/01 |] | 7/27/01 | : | 7/31/01 : |
| Location Quality | [| Good |] | Good | : | Good - Golf Course : (43,750) : |
| Site Size (Acres) | [| 2.48 |] | 1.00 | : 37,500 : | 1.58 : 43,750 : |
| View | [| Low Level |] | Low Level | : | None : |
| Design & Appeal | [| Good |] | Good | : | Good : |
| Construction Quality | [| Good |] | Good | : | Superior : (87,500) : |
| Age & Condition | [| 1989/Good |] | 1989/Good | : | 1990/Good : |
| Bdrms/Baths | [| 4/4.5 |] | 5/4 | : | 3/3 : 25,000 : |
| Gross Living Area | [| 4,142 |] | 3,400 | : 74,200 : | 3,860 : 28,200 : |
| Functional Utility | [| Good/2 Sty |] | Good/2 Sty | : | Good/1 Sty : |
| Heating/Cooling | [| Central FA |] | Central FA | : | Central FA : |
| Garage/Carport | [| 3 Car Gar. |] | 3 Car Gar. | : | 3 Car Gar. : |
| Patios, Porches, Pools etc. | [| Good |] | Good | : | Good : |
| Miscellaneous | [| Pool |] | Pool | : | NA : 50,000 : |
| Other (kitchen equip., extras) | [| Good |] | Good | : | Average : |
| NET ADJUSTMENT | [| |] | | : \$111,700 : | : \$15,700 : |
| ADJUSTED PRICE OF COMPARABLE | [| |] | | : \$861,700 : | : \$890,700 : |
| PRICE OF INDEX SALE | [| |] | | : \$775,000 : | : \$775,000 : |
| DIFFERENCE | [| |] | | : (\$86,700) : | : (\$115,700) : |
| PERCENT DIFFERENCE | [| |] | | : -11.19% : | : -14.93% : |
| AVERAGE DIFFERENCE | [| -13.06% |] | | : | : |

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In all but one instance, the index sale is adversely impacted by the proximity to the corridor facilities. The first chart is an analysis of an index sale on Vista Rodeo Drive and four comparable sales within the same 12 lot subdivision, Boulder Point. These homes were originally sold during 2001-2002. Prices ranged from \$545,000 to \$655,000. Lot sizes are from 1.00 acre to 4.08 acres. The index sale has a 250 foot wide transmission line corridor along the west boundary of the 4.08 acre site. The facilities are visible from some of the other lots in the development. As shown, the analysis shows a range of negative influence on prices from zero percent to 23.12 percent, averaging 15.68 percent.

The second chart also includes an index sale and four sale comparables. The index sale is located on Tiffany Park Place. These properties are in a tract development that originally sold out in 2003. Prices were typically in the mid to high \$300,000 price range. The index sale has a 200 foot wide transmission line corridor across the rear portion of the site. The sale comparables are in the same development, but not adversely influenced by the corridor. The range of indicators is from a low of 8.36 percent to a high of 20.21 percent. The overall average discount is 16.62 percent.

The third chart involves an index sale on Jamacha View Drive and two comparable sales in the same development. These are tract homes that originally sold in the early 1990's. There is a 250 foot wide transmission line corridor at the rear of the lots along the west side of Jamacha View Drive, off the property. The facilities are in direct view of these home sites. The range of indicators from this analysis is 8.35 percent to 9.97 percent with an average discount of 9.16 percent.

The fourth chart involves homes in the same general area as those in the third chart, on the other side of the noted transmission corridor. The index sale is on Caroway Court. These are expensive well built homes, some of which front the Cottonwood golf course. One index sale and two homes were chosen for analysis. The rear yard of the index sale is encumbered by about 115 feet of the 250 foot wide corridor. After appropriate adjustments, the indicators show a range of 11.19 percent to 14.93 percent, with an average discount of 13.06 percent.

The second analysis also involves choosing an index sale and comparables not subject to the influence of a major transmission line corridor. In this case, land data provide the basis for the analysis. Four pairings are included and summarized below in four separate charts.

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| Summary of Market Data - Adjustment for Proximity | | | | |
|---|------------------------------|-------------------------------|--------------------------------|--------------------------------|
| Datum No. | Index Sale | 1 | 2 | 3 |
| Location | ES of Highway 67 Lakeside | 11818 Moreno Ave. Lakeside | 12019 Promise Lane Lakeside | 11790 Hi Ridge Rd. Lakeside |
| Assessor Parcel Nos. | 377-271-30 | 377-340-01 | 379-093-56 | 375-160-10 |
| Lot Size (Acres) | 1.57 | 1.56 | 1.14 | 2.04 |
| Zone | A70 | A70 | A70 | A70 |
| General Plan | Residential | Residential | Residential | Residential |
| Entitlements | None | None | None | None |
| Existing Site Use | Vacant | Unpermitted Res. | Vacant | Vacant |
| Highest & Best Use | Residential | Residential | Residential | Residential |
| Sale Price | \$240,000 | \$285,000 | \$415,000 | \$330,000 |
| Sale Terms | Cash to Seller | \$170,200 Cash | Cash to Seller | Cash to Seller |
| Date of Recording | 5/25/2005 | 10/17/2005 | 10/13/2006 | 5/15/2006 |
| Price Per Site | \$240,000 | \$285,000 | \$415,000 | \$330,000 |
| Summary of Adjustment Analysis | | | | |
| Datum No. | Index Sale | 1 | 2 | 3 |
| Price Per Site | | \$285,000 | \$415,000 | \$330,000 |
| Adjustments | | | | |
| Property Rights Conveyed | Fee Simple | 0.00% | 0.00% | 0.00% |
| Financing | Cash Equiv. | 0.00% | 0.00% | 0.00% |
| Conditions of Sale | Arm's Length | 0.00% | 0.00% | 0.00% |
| Market Conditions | Stable | 0.00% | 8.50% | 12.25% |
| Net Adjustment | | 0.00% | 8.50% | 12.25% |
| Adj. Price Per Site | | \$285,000 | \$450,275 | \$370,425 |
| Physical Adjustments | | | | |
| Location | Good | 0.00% | -25.00% | -10.00% |
| Size/Shape/Utility | Good | 0.00% | -5.00% | 5.00% |
| Topo/View/Use Potential | Gen. Roll./Avg./Avg. | 10.00% | 0.00% | -10.00% |
| Net Adjustment | | 10.00% | -30.00% | -15.00% |
| Adjusted Price of Comparable | | \$313,500 | \$315,193 | \$314,861 |
| Price of Index Sale | | \$240,000 | \$240,000 | \$240,000 |
| Difference | | -\$73,500 | -\$75,193 | -\$74,861 |
| Percent Difference | | -30.63% | -31.33% | -31.19% |
| Average Difference | | -31.05% | | |

This paired sales analysis involves a relatively small lot located adjacent to State Highway 67 in Lakeside. The index sale is an undeveloped site that was purchased by an adjoining property owner to incorporate into his business operation. The selling agent indicated that the existence of the transmission line corridor across the southern portion of the property did not have a significant influence on the price paid, however, it appears from the analysis that there was significant impact.

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| Summary of Market Data - Adjustment for Proximity | | | | |
|---|----------------------|----------------|----------------------|-----------------|
| Datum No. | Index Sale | 1 | 2 | 3 |
| Location | ES Mussey Grade Rd. | Highway 67 | 12494 Buena Vida Rd. | Muth Valley Rd. |
| | Ramona | Lakeside | Lakeside | Lakeside |
| Assessor Parcel Nos. | 329-010-05 | 324-051-05 | 329-131-05 | 329-132-37 |
| Lot Size (Acres) | 57.20 | 22.35 | 39.77 | 39.37 |
| Zone | A70 | A70 | A70 | A70 |
| General Plan | MRU | MRU | MRU | Estate |
| Entitlements | None | None | None | None |
| Existing Site Use | Vacant | Vacant | Vacant | Vacant |
| Highest & Best Use | Residential | Residential | Residential | Residential |
| Sale Price | \$350,000 | \$225,000 | \$435,000 | \$350,000 |
| Sale Terms | Cash to Seller | Cash to Seller | Cash to Seller | Cash to Seller |
| Date of Recording | 6/23/2005 | 4/15/2004 | 5/3/2005 | 5/31/2006 |
| Price Per Acre | \$6,119 | \$10,067 | \$10,938 | \$8,890 |
| Summary of Adjustment Analysis | | | | |
| Datum No. | Index Sale | 1 | 2 | 3 |
| Price Per Site | | \$10,067 | \$10,938 | \$8,890 |
| Adjustments | | | | |
| Property Rights Conveyed | Fee Simple | 0.00% | 0.00% | 0.00% |
| Financing | Cash Equiv. | 0.00% | 0.00% | 0.00% |
| Conditions of Sale | Arm's Length | 0.00% | 0.00% | 0.00% |
| Market Conditions | Stable | 0.00% | 8.50% | 12.25% |
| Net Adjustment | | 0.00% | 8.50% | 12.25% |
| Adj. Price Per Site | | \$10,067 | \$11,868 | \$9,979 |
| Physical Adjustments | | | | |
| Location | Good | -10.00% | -10.00% | -10.00% |
| Size/Shape/Utility | Good | -10.00% | -7.50% | -7.50% |
| Topo/View/Use Potential | Gen. Roll./Avg./Avg. | -10.00% | -15.00% | -5.00% |
| Net Adjustment | | -30.00% | -32.50% | -22.50% |
| Adjusted Price/Ac of Comparable | | \$7,047 | \$8,011 | \$7,734 |
| Price/Ac of Index Sale | | \$6,119 | \$6,119 | \$6,119 |
| Difference | | -\$928 | -\$1,892 | -\$1,615 |
| Percent Difference | | -15.17% | -30.92% | -26.39% |
| Average Difference | -24.16% | | | |

The second land pairing involves a 57.20 acre parcel that is bisected in a general east to west direction by a 100 foot wide/69kV transmission line easement. The alignment is through the approximate mid portion of the land, consuming an area of approximately 2.8 acres. There are two tower sites on the property. After adjustments, the indicated range of discount is from a low of 15.17 percent to a high of 30.92 percent. The average discount is 24.16 percent.

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| Summary of Market Data - Adjustment for Proximity | | | | |
|---|----------------------|----------------|------------------|---------------------|
| Datum No. | Index Sale | 1 | 2 | 3 |
| Location | Paseo De Ocho Minos | Highway 67 | 14365 Highway 67 | 16340 Chaparral Way |
| | Lakeside | Lakeside | Lakeside | Poway |
| Assessor Parcel Nos. | 324-040-41 | 324-051-05 | 324-010-56 | 322-010-49 |
| Lot Size (Acres) | 20.02 | 22.35 | 10.00 | 20.55 |
| Zone | A70 | A70 | A70 | RRA |
| General Plan | MRU | MRU | MRU | Residential |
| Entitlements | None | None | None | None |
| Existing Site Use | Vacant | Vacant | Vacant | Vacant |
| Highest & Best Use | Residential | Residential | Residential | Residential |
| Sale Price | \$300,000 | \$225,000 | \$180,000 | \$500,000 |
| Sale Terms | Cash to Seller | Cash to Seller | Cash to Seller | Cash to Seller |
| Date of Recording | 10/7/2004 | 4/15/2004 | 3/23/2005 | 4/30/2004 |
| Price Per Acre | \$14,985 | \$10,067 | \$18,000 | \$24,331 |
| Summary of Adjustment Analysis | | | | |
| Datum No. | Index Sale | 1 | 2 | 3 |
| Price Per Site | | \$10,067 | \$18,000 | \$24,331 |
| Adjustments | | | | |
| Property Rights Conveyed | Fee Simple | 0.00% | 0.00% | 0.00% |
| Financing | Cash Equiv. | 0.00% | 0.00% | 0.00% |
| Conditions of Sale | Arm's Length | 0.00% | 0.00% | 0.00% |
| Market Conditions | Stable | 0.00% | 8.50% | 12.25% |
| Net Adjustment | | 0.00% | 8.50% | 12.25% |
| Adj. Price Per Site | | \$10,067 | \$19,530 | \$27,311 |
| Physical Adjustments | | | | |
| Location | Good | 10.00% | 10.00% | -25.00% |
| Size/Shape/Utility | Good | 0.00% | -25.00% | 0.00% |
| Topo/View/Use Potential | Gen. Roll./Avg./Avg. | 10.00% | 0.00% | -10.00% |
| Net Adjustment | | 20.00% | -15.00% | -35.00% |
| Adjusted Price/Ac of Comparable | | \$12,081 | \$16,601 | \$17,752 |
| Price/Ac of Index Sale | | \$14,985 | \$14,985 | \$14,985 |
| Difference | | \$2,904 | -\$1,615 | -\$2,767 |
| Percent Difference | | 19.38% | -10.78% | -18.47% |
| Average Difference | -3.29% | | | |

The above index sale is located in the northern portion of the Lakeside Community Planning Area. The approximate 20 acre site is encumbered by a 100 foot wide 69kV transmission corridor along the south property boundary. The easement contains an area of about 2.79 acres. This property is zoned for agricultural and residential uses, but it was purchased for mitigation of disturbed coastal sage scrub habitat for a project in San Marcos. The unique aspect of this analysis is that Comparable 1 actually shows a positive number. This could be explained due to a low sale or because the index sale price is on the high side. The other two sales are considered more typical of the market and suggest discounts between 10.78 percent and 18.47 percent. The average discount is 3.29 percent. Excluding the atypical sale, the overall average is a discount of 14.63 percent.

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| Summary of Market Data - Adjustment for Proximity | | | | |
|---|---|-----------------------------|-----------------------------|---------------------------------------|
| Datum No. | Subject | 1 | 2 | 3 |
| Location | So. of State Route 94 W. of Barrett Junction | Harris Ranch Rd. Potrero | 27435 Highway 94 Potrero | SW of Olde Hwy 80 Bankhead Springs |
| Assessor Parcel Nos. | 650-070-06 | 654-030-11, 654-040-14 | 654-080-15 | 659-040-05, 659-100-02, 16 |
| Lot Size (Acres) | 208.34 | 122.18 | 73.95 | 194.67 |
| Zone | A70 | S92 | S92 | S92 |
| General Plan | Gen. Ag./Ag. Pres. | MRU | MRU | MRU |
| Entitlements | None | None | None | None |
| Existing Site Use | Vacant | Old Res. Imps. | Old Res. Imps. | Vacant |
| Highest & Best Use | Residential | Residential | Residential | Residential |
| Sale Price | \$365,000 | \$275,000 | \$246,000 | \$349,000 |
| Sale Terms | Cash to Seller | Cash to Seller | Cash to Seller | Cash to Seller |
| Date of Recording | 11/1/2001 | 12/13/2002 | 3/25/2002 | 11/6/2002 |
| Price Per Acre | \$1,752 | \$2,251 | \$3,327 | \$1,793 |
| Summary of Adjustment Analysis | | | | |
| Datum No. | Subject | 1 | 2 | 3 |
| Price Per Site | | \$2,251 | \$3,327 | \$1,793 |
| Adjustments | | | | |
| Property Rights Conveyed | Fee Simple | 0.00% | 0.00% | 0.00% |
| Financing | Cash Equiv. | 0.00% | 0.00% | 0.00% |
| Conditions of Sale | Arm's Length | 0.00% | 0.00% | 0.00% |
| Market Conditions | Stable | 0.00% | 0.00% | 0.00% |
| Net Adjustment | | 0.00% | 0.00% | 0.00% |
| Adj. Price Per Site | | \$2,251 | \$3,327 | \$1,793 |
| Physical Adjustments | | | | |
| Location | Good | 0.00% | 0.00% | 0.00% |
| Size/Shape/Utility | Good | -10.00% | -25.00% | 0.00% |
| Topo/View/Use Potential | Gen. Roll./Avg./Avg. | -5.00% | -10.00% | 0.00% |
| Net Adjustment | | -15.00% | -35.00% | 0.00% |
| Adjusted Price/Ac of Comparable | | \$1,913 | \$2,162 | \$1,793 |
| Price/Ac of Index Sale | | \$1,752 | \$1,752 | \$1,752 |
| Difference | | -\$161 | -\$410 | -\$41 |
| Percent Difference | | -9.20% | -23.42% | -2.33% |
| Average Difference | -11.65% | | | |

The last pairing involves a large land holding located just west of Barrett Junction in the southern portion of the County. This is an irregular shaped parcel that is split east to west by a 200 foot wide/500kV transmission line easement that consumes an area of 18.18 acres. The easement contains one tower site. The property was purchased as a passive investment for an employee pension fund. The comparables are similar type properties of varying sizes, not influenced by major transmission lines. After adjustments, the discount range is from a low of 2.33 percent to a high of 23.42 percent, with an average of 11.65 percent.

Summary

A total of eight pairings have been prepared, four each involving detached single family residential properties and land sale transactions. The summary of our overall analysis is shown in the following chart.

Valley Stream Ranch

| Summary of Paired Sales Analysis | | | | | |
|----------------------------------|---------|---------|---------|---------|---------|
| Residential Pairings | | | | | |
| | Datum 1 | Datum 2 | Datum 3 | Datum 4 | Average |
| Vista Rodeo Drive | 0.00% | -23.12% | -17.26% | -22.32% | -15.68% |
| Tiffany Park Place | -8.36% | -20.10% | -17.84% | -20.21% | -16.62% |
| Jamacha View Drive | -8.35% | -9.97% | NA | NA | -9.16% |
| Caroway Court | -11.19% | -14.93% | NA | NA | -13.06% |
| Land Pairings | | | | | |
| | Datum 1 | Datum 2 | Datum 3 | Datum 4 | Average |
| ES of Highway 67 | -30.63% | -31.33% | -31.19% | NA | -31.05% |
| ES Mussey Grade Rd. | -15.17% | -30.92% | -26.39% | NA | -24.16% |
| Paseo De Ocho Minos | 19.38% | -10.78% | -18.47% | NA | -3.29% |
| So. of State Route 94 | -9.20% | -23.42% | -2.33% | NA | -11.65% |

These studies show a wide variance of indicated discounts; from no discount to 23.12 percent in the residential pairings, and from a low of 2.33 percent to a high of 31.33 percent in the land pairings. The corridors influencing these data range from 100 feet wide with 69kV power lines to 250 feet wide with 230kV/500kV power lines. The location of the homes used in this analysis would be regarded as generally superior to the subject location, while the location of the land pairings would be considered generally inferior.

More Recent Data

A more recent search was undertaken in an effort to verify the validity of the findings reflected by these many studies. We also discussed the current market with real estate agents familiar with sales and listings around some of these electrical transmission line and tower facilities.

One of the properties appraised back in 2010 was APN 389-030-17 at 11670 Wildcat Canyon Road in Lakeside. The property is an undeveloped 28.63 acres parcel of land. At the time of appraisal, the site was zoned A-72, General Agriculture permitting minimum eight acre parcels on the approximate westerly three-quarters of the parcel; RR.5, Rural Residential, allowing single family residential use at a density of one unit per two gross acres on the balance of the parcel. The general plan designation was Category 17, Estate Residential which allows a two acre minimum parcel size; and Category 18, Multiple Rural Use which allows a four acre minimum site size. The property was appraised at that time prior to placement of the 300 foot wide easement and electrical transmission line facilities for \$554,000. The facilities were installed in 2011-2012 and the property resold in October 2018 for \$375,000, a decrease of over 32 percent.

A second property appraised back in 2010 was APN 389-041-06 located east of Wildcat Canyon Road in Lakeside. The property is an undeveloped 83.00 acres parcel of land. At the time of appraisal, the site was zoned A70, Limited Agriculture permitting minimum four acre parcels. The general plan designation was Category 18, Multiple Rural Use which allows a four

Valley Stream Ranch

acre minimum site size. The property was appraised at that time prior to placement of the 300 foot wide easement and electrical transmission line facilities for \$403,000. The facilities were installed in 2011-2012 and the property resold in April 2018 for \$95,000, a decrease of over 76 percent.

A third property appraised back in 2010 was APN 389-050-11 located on Rocky Lane east of Moreno Avenue in Lakeside. The property is an undeveloped 19.61 acres parcel of land. At the time of appraisal, the site was zoned A70, Limited Agriculture permitting minimum four acre parcels; and A72, General Agriculture, permitting minimum eight acre parcels on the approximate easterly one-eighth of the parcel. The general plan designation was Category 18, Multiple Rural Use which allows a four acre minimum site size. The property was appraised at that time prior to placement of the 300 foot wide easement and electrical transmission line facilities for \$310,000. The facilities were installed in 2011-2012 and the property resold in January 2019 for \$200,000, a decrease of over 35 percent.

A fourth property appraised back in 2010 was APN 389-050-10, also located on Rocky Lane east of Moreno Avenue in Lakeside. The property is an undeveloped 47.80 acres parcel of land. At the time of appraisal, the site was zoned A70, Limited Agriculture permitting minimum four acre parcels; and A72, General Agriculture, permitting minimum eight acre parcels on the approximate easterly one-eighth of the parcel. The general plan designation was Category 18, Multiple Rural Use which allows a four acre minimum site size. The property was appraised at that time prior to placement of the 300 foot wide easement and electrical transmission line facilities for \$392,000. The facilities were installed in 2011-2012 and the property resold in March 2020 for \$120,000, a decrease of over 69 percent.

These more recent data are not sales and resales of the same property nor are they paired sales where a discount can be derived by comparison of an index sale property affected by an adverse condition to others that are not so affected. They are presented only to illustrate that there is indeed some influence on prices paid for properties subject to some adverse physical condition. It is noted that all of the examples associated with electrical power line transmission facilities are not directly relatable to the subject situation, but they do illustrate that there are issues associated with being proximate to a visual and potentially dangerous feature. Following are excerpts from some publications that have addressed these issues.

With Lithium-Ion Batteries, Fire Hazard Remains Unsolved ENR-Engineering News-Record – October 23-2019

Six months after an explosion and fire destroyed a grid-connected energy storage battery facility in Surprise, Ariz., investigators are still trying to figure out all that happened. The incident sent eight firefighters and a police officer to the hospital, and three required extended stays. What happened at the Arizona Public Service Co. site was a shocking reminder of the potential fire hazards of lithium-ion battery energy storage, which makes up virtually all such new systems in the U.S. This was not the utility's first fire experience. Following a 2012 blaze at another battery storage facility, Arizona Public Service applied lessons from that failure as it continued to add stationary storage for its renewable energy fleet. Storage is a major part of the utility's plans. In February 2019 Arizona Public Service announced that it intended to add 850

MW of solar storage and standalone battery storage to its system's existing 6 MW of battery storage by 2025. The storage program is part of a long-term clean energy transition in which renewable and storage technologies will play an increasingly important role, utility officials say.

Arizona Commissioner Cites “Unacceptable Risks” from Lithium-Ion Batteries for Large-Scale Projects

Utility Dive – August 6, 2019

Democratic Commissioner Sandra Kennedy raised concerns on Friday about the use of lithium-ion battery chemistry in the wake of Arizona Public Service's (APS) battery storage fire on April 19 (2019). Kennedy acted independent of the other four members of the Arizona Corporation Commission (ACC), having previously expressed interest in opening an ACC investigation into lithium-ion chemistries. Her letter, part of the commission's docket on the fire with a 2 MW, 2 MWh lithium-ion storage system at APS McMicken substation, outlined the risks of lithium-ion and offered other battery substitutes for a larger deployment of storage. Investigations into the APS fire at the McMicken facility are ongoing, including internally at APS. However, Kennedy's letter cites lessons learned from a 2012 lithium-ion fire at APS' Eldon Substation, concluding that utility-scale batteries using those lithium-ion chemistries "are not prudent and create unacceptable risks."

"As large-scale investments are made, it would be prudent and advisable to invest in utility scale energy storage systems that are sustainable, less risky, and do not utilize chemistries that have a potential to release hydrogen fluoride in the event of a fire or explosion," Kennedy wrote in her letter. She referred to hydrogen fluoride, a poisonous gas that can be created when lithium-ion batteries degrade and decompose during a fire. While lithium-ion prices continue to fall, she identified other types of storage, including non-battery energy storage that has become price competitive. "There are other utility scale battery technologies that are available that are far more sustainable and do not have these risks. There are also other lithium ion batteries that utilize chemistries that do not carry the same risks as those involved in the Eldon Substation and McMicken incidents," Kennedy said in her letter.

"There are 9,000 megawatts of energy storage in operation around the world, using these [lithium-ion] cells in safe, controlled, pre-engineered environments," John Zahurancik, Chief Operating Officer of Fluence, told Utility Dive via email. "All electricity generation, distribution, and transmission technologies bring a measure of risk that requires careful operation and appropriate layers of safety. Lithium-ion based energy storage has been proven safe through years of operation, and utilities around the world have made it a critical part our energy mix."

Concerns about Li-Ion Battery Safety in Wake of Fires **American Public Power Association – August 9, 2019**

This article expands on the Kennedy letter discussed in the previous paragraphs.

That incident had been preceded by a “near miss” in May in which a severely discharged cell in the battery was continuously charged in contravention of design parameters. Kennedy noted there were no subsequent changes to the storage facility's control system and the event was not disclosed to APS staff by Electrovaya, the designer and installer of the system.

An investigation into the 2012 fire found “inadequate electrical circuit protection and issues with the design of the temperature sensors within the modules,” Kennedy wrote. The investigation warned of “thermal runaway” that can occur when a severely discharged battery cell is charged, resulting in cell deterioration and damage to nearby cells. The thermal degradation can result in the release of flammable and poisonous gases, including deadly hydrogen fluoride and hydrofluoric acid. The danger is increased because that type of battery cannot be suppressed by water but requires a chemical suppressant to suffocate there, but use of a chemical suppressant “does not seem viable for a very large facility incident,” Kennedy wrote.

“Knowing now how easily a fire and/or explosion can evidently occur at these types of relatively small (2 MW) lithium ion battery facilities, it appears that a similar re event at a very large lithium ion battery facility (250+ MW) would have very severe and potentially catastrophic consequences, and that responders would have a very difficult time trying to handle such an incident.” Kennedy wrote.

Kennedy noted that the explosive potential of a 2 MW battery facility is equal to 1.72 tons of TNT and that a 250 MW battery storage facility is equal to 215 tons of TNT. She also noted that the large amount of hydrogen fluoride that could be released could harm the public “at a substantial distance downwind.”

Lithium-ion Battery Energy Storage Systems - The risks and how to manage them - What are the risks involved?

AIG Energy Industry Group – January 2018

While the use of batteries is nothing new, what is new is the size, complexity, energy density of the systems and the Li-ion battery chemistry involved – which can lead to significant fire risks.

These risks are exacerbated by the fact that many of the new users of BESS’s are not energy specialists. Previously, these systems would have been used by companies that had an in-depth understanding of their uses and potential dangers. Today, a buyer of a BESS is just as likely to be a property developer, council or university, with limited understanding of the inherent hazards.

Thermal runaway

‘Thermal runaway’ – a cycle in which excessive heat keeps creating more heat – is the major risk for Li-ion battery technology. It can be caused by a battery having internal cell defects, mechanical failures/damage or overvoltage. These lead to high temperatures, gas build-up and potential explosive rupture of the battery cell, resulting in fire and/or explosion. Without disconnection, thermal runaway can also spread from one cell to the next, causing further damage. In BESS’s that utilize lead acid batteries, hydrogen evolution can result in explosive atmospheres unless proper ventilation methods are employed

Difficulty of fighting battery fires

Battery fires are often very intense and difficult to control. They can take days or even weeks to extinguish properly, and may seem fully extinguished when they are not. They can also

be very dangerous to fire fighters and other first responders because, in addition to the immediate fire and electricity risks, they may be dealing with toxic fumes, exposure to hazardous materials and building decontamination issues. Different types of batteries also react differently to fire, so firefighters must be knowledgeable about how they react and how to respond. Otherwise they may decide to contain the fire but leave it to burn itself out leading to the loss of the entire facility.

Failure of control systems

Another issue can be failure of protection and control systems. For example, a Battery Management System (BMS) failure can lead to overcharging and an inability to monitor the operating environment, such as temperature or cell voltage. Sensitivity of Li-ion batteries to mechanical damage and electrical transients Contrary to existing conventional battery technology, Li-ion batteries are very sensitive to mechanical damage and electrical surges. This type of damage can result in internal battery short circuits which lead to internal battery heating, battery explosions and fires. The loss of an individual battery can rapidly cascade to surrounding batteries, resulting in a larger scale fire.

Burning concern: Energy storage industry battles battery fires ThemeEnergy – 2019

When a 2-MW battery array in Surprise, Ariz. caught fire and subsequently exploded on April 19, 2019 it highlighted a troubling reality for the nascent energy storage industry: the sector's momentum, marked by record numbers of deployments, falling prices and expanding state mandates and incentives, could be derailed by a series of well-publicized and, in some cases, little-known incidents involving runaway fires.

As projects proliferate, driven by demand for solutions to integrate intermittent renewables into grid operations and to offset the need for fossil fuels, the industry is being forced to acknowledge that fires, most of them linked to lithium-ion batteries, are occurring with troubling frequency. Incidents over the past year include the blaze in Arizona along with more than 20 energy storage systems that have reportedly caught fire in South Korea, putting the world's hottest energy storage market on ice amid a safety probe. Fires linked to lithium-ion batteries also have hit Europe and Australia.

Analysis of the 2012 incident revealed critical system design flaws, including a lack of proper ventilation and an inadequate monitoring system, an APS official said in an email. Those shortcomings were supposedly corrected in subsequent installations, but that did not prevent the latest disaster. The probe into the April blaze looms large for APS, which plans to add at least 850 MW of batteries by 2025, including at existing and new solar farms, and the U.S. storage industry as a whole, given the current dominance of lithium-ion batteries for new projects.

"In general, it's a very safe technology," Ken Boyce, a principal engineer at product safety certification, testing and advisory firm UL LLC, said in an interview. Lithium-ion battery cells fail at a rate of only around one in every 12 million, he said. Unfortunately, with billions of cells now being installed each year, that means "something is going to happen," he said. UL's research into "the physics of failure" have revealed repeated problems with the flammable

Valley Stream Ranch

electrolyte in lithium-ion batteries that can cause "thermal runaway," according to Boyce, when an overheated cell turns into a self-perpetuating cascade. The problem can be triggered by internal defects or external stress factors, such as temperature, that cause one compromised cell to ignite adjacent ones, risking a large-scale fire. Boyce calls thermal runaway his top safety concern related to lithium-ion batteries. It can also affect other battery types.

"Lithium-ion batteries can burn," said Ben Ditch, a fire researcher at FM Global. "The fact is the hazard exists. It is something a lot of us have been worried about for some time."

FINAL CONCLUSION

In the case of electrical power line facilities there is both the aesthetic issue and the EMF issue that could deter someone from acquiring a property proximate to these facilities, or as our study shows, may buy it at a discounted amount. The discounts that we determined through our study range from zero to roughly 22 percent for the residentially improved pairings with most in the range of 10 to 20 percent; and from approximately three to 31 percent for the land pairings, with most in the range of 10 to 30 percent.

The battery storage facility to be built on the adjacent parcel will enclose the proposed improvements within an 8-foot high vinyl fence, but this will not completely eliminate views of the buildings from across the subject property. The fence alone would not appear to be a visually appealing feature. Photo simulations were conducted during the planning phase for the facility and one of these is shown below with a notation of its proximity to the appraised property.



This view is southeast over the project site with the subject visible adjacent on two sides.

Valley Stream Ranch

Project proponents have prepared a Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183 for the Valley Center Energy Storage project. In this statement they have addressed aesthetics, air quality, noise, drainage, fire protection, greenhouse gas emissions, hazards and hazardous materials, flood potential, and others.

This statement concluded in every instance that there will be no adverse impacts resulting from construction and/or operation of the proposed facility beyond what had already been identified in the San Diego County General Plan Update Environmental Impact Report (EIR). It identifies mitigation measures wherever the EIR notes potentially significant off-site and/or cumulative impacts resulting from the project. All of the issues addressed in the Statement are important, but from a valuation perspective, we view the issues of aesthetics, noise, air quality and hazards and hazardous materials most significant.

The subject property is rarely noted in these studies and we never did see recognition that there are seven residences on the property; just comments about its agricultural character. The proposed battery storage project will border subject at its east and south boundaries. While the appraised property is mostly used for agricultural purposes, it has a general plan land use classification that would permit residential development on two to four acre sites. Some of these potential lots could be immediately adjacent to the battery storage facility site. Agricultural development is getting more and more costly over time and newly implemented water well management regulations will likely exacerbate that situation.

In the final analysis, we estimate that a potential buyer of the appraised property would discount its market value due to the scope, magnitude and perception that things could go wrong as they have at other lithium-ion battery storage facilities. Certain potential buyers would likely view the risks of this happening too significant and not consider the property a candidate for acquisition. Electrical transmission line facilities are visually unappealing and electromagnetic fields effect on health is inconclusive, but we discovered perception of such a potential hazard can contribute to the discounts shown in our studies. As noted there is no empirical evidence to support the appropriate discount or loss in value associated by being proximate to one of these battery storage facilities; but nonetheless, the electrical power line analyses provide an indication that some value loss is probable. Accordingly, we estimate that as a result of the construction and operation of the proposed lithium-ion battery storage facility adjacent to the appraised property that a potential buyer would allocate a 20 percent discount to its market value as is. This results in the following estimates of market value.

| | |
|---|--------------------|
| Market Value As Is | \$5,519,000 |
| Discount 20.00% | <u>\$1,103,800</u> |
| Market Value with Battery Storage Facility on Adjacent Parcel | \$4,415,200 |
| Rounded | \$4,415,000 |

ADDENDA

Subject Property Photographs

Valley Stream Ranch

Subject Property Photographs



Guest House # 1 Shower

Valley Stream Ranch

Subject Property Photographs



Guest House # 1 Bedroom

Valley Stream Ranch

Subject Property Photographs



Guest House # 1 Fireplace

Valley Stream Ranch

Subject Property Photographs



Guest House # 1 Office

Valley Stream Ranch

Subject Property Photographs



Guest House # 2 Bathroom

Valley Stream Ranch

Subject Property Photographs



Guest House # 2 Laundry Room

Valley Stream Ranch

Subject Property Photographs



Guest House # 2 Main Room

Valley Stream Ranch

Subject Property Photographs



Main House Dining Room

Valley Stream Ranch

Subject Property Photographs



Main House Guest Bathroom # 1

Valley Stream Ranch

Subject Property Photographs



Main House Guest Bedroom # 1

Valley Stream Ranch

Subject Property Photographs



Main House Guest Bedroom # 2

Anderson & Brabant, Inc.

Valley Stream Ranch

Subject Property Photographs



Main House Kitchen

Valley Stream Ranch

Subject Property Photographs



Main House Master Bathroom Shower and Vanity

Valley Stream Ranch

Subject Property Photographs



Main House Master Bathroom Tub and Toilet

Valley Stream Ranch

Subject Property Photographs



Main House Living Room

Valley Stream Ranch

Subject Property Photographs



Main House Master Bedroom

Valley Stream Ranch

Subject Property Photographs



Office in the Main House

Valley Stream Ranch

Subject Property Photographs



Pool House Bathroom

Valley Stream Ranch

Subject Property Photographs



Main entrance to the property off Valley Center Road



Front of the Main House

Valley Stream Ranch

Subject Property Photographs



Rear of Main House



View of the Pool and Pool House from the Main House

Subject Property Photographs



Guest House #1



Guest House #2

Valley Stream Ranch

Subject Property Photographs



Guest House #3



Tennis Court

Valley Stream Ranch

Subject Property Photographs



Pool and Pool House



View toward the Main House from the area of the Pool House

Valley Stream Ranch

Subject Property Photographs



Large Garages



Two additional Garages – Break Rooms

Anderson & Brabant, Inc.

Valley Stream Ranch

Subject Property Photographs



Warehouse



Workshop

Anderson & Brabant, Inc.

Valley Stream Ranch

Subject Property Photographs



Foreman's House



Rental House

Anderson & Brabant, Inc.

Valley Stream Ranch

Subject Property Photographs



Junes House



Carport/Parking Area at Junes House

Anderson & Brabant, Inc.

Valley Stream Ranch

Subject Property Photographs



Portion of the Canal



Some of the Eucalyptus Plantings

Subject Property Photographs



Some of the Citrus Plantings



Some of the Sunflower Plantings

From: [John Corley](#)
To: [Ochoa, Regina](#)
Subject: Valley Center Energy Storage (PDS2020-STP-20-011) Comment Letter #2
Date: Thursday, August 6, 2020 6:01:11 PM
Attachments: [VC Energy Storage Comment Letter #2.pdf](#)

Hi Regina,

Attached is another letter discussing how the Valley Center Energy Storage site would be classified as a critical facility in a high risk flood zone.

Thank you,

John Corley

Comment D-1



John J. Corley
 14535 Vesper Road (Property)
 Valley Center, CA 92082
 jyelroc1@gmail.com

August 6, 2020

Regina Ochoa, Project Manager
 County of San Diego Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123-1239
 regina.ochoa@sdcounty.ca.gov

SUBJECT: VALLEY CENTER ENERGY STORAGE, PDS2020-STP-20-011, PDS2020-ER-20-08-005, PDSXXXX-HLP-XXX,

Dear Ms. Ochoa,

The Valley Center Energy Storage Project would construct a battery energy storage system (BESS) facility capable of delivering 140-megawatts (MW) for a 4-hour period on a potential site already designated in a FEMA Flood Zone A. Floodplain Analysis and CEQA Preliminary Drainage Studies were conducted by hired consultants to obviously try and change that narrative in favor of the developer Terra-Gen. Unfortunately, Terra-Gen overlooked one important factor that they cannot ignore. The Valley Center Energy Storage facility would be classified as a critical facility in which higher regulatory standards and floodplain management plans would apply for their site.

I reached out and live chatted with a FEMA representative on July 30th, 2020, *see figure 1*. In the live chat transcript, you can see my detailed questions concerning this Project and FEMA's responses to them. Two important takeaways from my chat. First, FEMA doesn't show any CLOMR/LOMR applications with Terra-Gen's site address. Second, as a power generating station, Valley Center Energy Storage would fall within the category of being a critical facility. For good measure, I also included the FEMA Fact Sheet for Critical Facilities and Higher Standards, *see figure 2*.

I also communicated with the County of San Diego Flood Control who sent me the latest Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) that talks about critical facilities and the risk of potential hazards such as flood. On page 77, under 4.4.1 Asset Inventory, they define a critical facility as a facility in either the public or private sector that provides essential products and services to the general public, is otherwise necessary to preserve the welfare and quality of life in the County, or fulfills important public safety, emergency response, and/or disaster recovery functions. One of those examples would be electric power facilities and their systems. *See figure 3*, Abbreviations and Costs Used for Critical Facilities and Infrastructure (ELEC – Electric Power facility). In the MJHMP, it states that the County of San Diego has developed 13 Goals for their Hazard Mitigation Plan. Goal 9 is to reduce the possibility of damage and losses to new or existing assets, including people, critical facilities/infrastructure, and public facilities due to floods, *see figure 4*.

Comment D-1
continued

Comment D-2

Comment D-3

Between FEMA and the County of San Diego's MJHMP, standards and goals have been established to discourage critical facilities from being located in high risk flood hazard areas. In my previous letter, I focused on San Diego Gas & Electric (SDG&E) and how they avoided the same 100-year floodplain that Terra-Gen thinks that they can easily remap off their proposed site. The Valley Center Community Planning Group overwhelmingly rejected Terra-Gen's Project due to public safety concerns, mainly fire hazard. Add to that the potential risk of flooding and the Director of Planning and Development Services and staff have no choice but to deny Terra-Gen's Site Plan permit to protect the residents of Valley Center.

Respectfully,

John J. Corley



Federal Emergency Management Agency

Washington, D.C. 20472

FEMA Map Information eXchange (FMIX) Live Chat Transcript 22402

John Corley (07/30/2020 09:39:33 AM)

***** Internal Message *****

First Name: John

Last Name: Corley

City: Valley Center

State: CA

Email: jyelroc1@gmail.com

Subject: 100 year flood zone site and a proposed battery energy storage system being considered on it. (29523 Valley Center Road Valley Center, CA 92082)

Treana (07/30/2020 09:39:42 AM)

Thank you for contacting the FEMA Mapping and Insurance eXchange (FMIX). How may I assist you today?

John Corley (07/30/2020 09:41:45 AM)

Good Morning. I need some help about about 100 year flood zone site and a developer trying to put battery containers on it.

John Corley (07/30/2020 09:42:53 AM)

I need a specialist that would know more about that process.

Treana (07/30/2020 09:43:53 AM)

Okay, what specific questions did you have?

John Corley (07/30/2020 09:46:25 AM)

I need to know if BESS (battery energy storage system) that stores energy and puts it back to the power grid would be considered a "Critical Facility" and would have stricter standards.

John Corley (07/30/2020 09:47:44 AM)

They are in the process with San Diego County planners to build it. Public Review on environmental right now.

Treana (07/30/2020 09:48:56 AM)

Please hold while I research your inquiry. I will be with you momentarily. Thank you.

John Corley (07/30/2020 09:49:14 AM)

Thank you

John Corley (07/30/2020 09:51:06 AM)

They are trying to get a CLOMR and LOMR. The site is 29523 Valley Center Road Valley Center, CA 92082.

John Corley (07/30/2020 09:52:19 AM)

As you probably can tell, I am a very concerned property owner nearby.

Treana (07/30/2020 09:56:34 AM)

A critical facility provides services and functions essential to a community, especially during and after a disaster. Power generating stations and other public and private utility facilities vital to maintaining or restoring normal services to flooded areas before, during, and after a flood would be considered a critical facility. If at all possible, critical facilities should be located outside all high-risk flood hazard areas, including Zones V and A.

figure 1

Unfortunately, we were unable to find a Letter of Map Change application using the address provided. Have you spoken with anyone in the community regarding your concerns?

John Corley (07/30/2020 09:58:18 AM)

So to clarify, right now you do not show any requests (CLOMR/LOMR) for that address by the developer?

John Corley (07/30/2020 09:59:46 AM)

The Valley Center Community Planning group did not recommend this project (3-11-1). Unfortunately its just a recommendation and now it is in the San Diego County hands.

Treana (07/30/2020 09:59:56 AM)

Yes that is correct, but it is possible they may have a different name for the project identifier.

Treana (07/30/2020 10:01:23 AM)

I would advise contacting the county Floodplain Administrator so that you can discuss your concerns with them regarding the project and discuss appeal options as well. If you would like I can provide you with their contact information.

John Corley (07/30/2020 10:02:09 AM)

Project Name is Valley Center Energy Storage. Project Applicant Name and Address : Valley Center ESS, LLC 1455 El Camino Real, Suite 160 San Diego, CA 92130.

Treana (07/30/2020 10:05:44 AM)

Unfortunately, I did not find an application under the project name or applicant name either.

John Corley (07/30/2020 10:07:52 AM)

Thank you so much. I have been in contact with SD County. One last question, this project would fit the criteria as a critical facility, i.e. acting like a utility company even though this is private?

John Corley (07/30/2020 10:08:44 AM)

Once you receive the request, I noticed it would take at least 60 days to review and make a decision right?

John Corley (07/30/2020 10:08:57 AM)

Once

Treana (07/30/2020 10:11:51 AM)

As a power generating station, it would fall within the category of being a critical facility. The case processing is about 60-90 days for a CLOMR/LOMR application.

John Corley (07/30/2020 10:13:56 AM)

Again thank you so much! That is what I figured, just wanted to make sure. Is there a way to have this chat copied and sent for documentation?

Treana (07/30/2020 10:14:24 AM)

Yes I can email you the transcript.

John Corley (07/30/2020 10:14:51 AM)

Great. Thanks again and have a nice day.

Treana (07/30/2020 10:14:59 AM)

Thank you for contacting the FEMA Mapping and Insurance eXchange (FMIX). It has been my pleasure to assist you today. This session will now be disconnected. Goodbye.

To exit from this chat window, please click on the "X" button at the top right corner.



FEMA

Fact Sheet

Federal Insurance and Mitigation Administration

Critical Facilities and Higher Standards

Even a slight chance of flooding can pose too great a threat to the delivery of services offered by the maintenance and operation of a community's critical facilities. Special consideration when formulating higher regulatory standards and floodplain management plans needs to occur when critical facilities are involved.

Identifying Critical Facilities

A critical facility provides services and functions essential to a community, especially during and after a disaster. Examples of critical facilities requiring special consideration include:

- Police stations, fire stations, critical vehicle and equipment storage facilities, and emergency operations centers needed for flood response activities before, during, and after a flood
- Medical facilities, including hospitals, nursing homes, blood banks, and health care facilities (including those storing vital medical records) likely to have occupants who may not be sufficiently mobile to avoid injury or death during a flood
- Schools and day care centers, especially if designated as shelters or evacuation centers (see Figure 1 for an example of an elevated school)
- Power generating stations and other public and private utility facilities vital to maintaining or restoring normal services to flooded areas before, during, and after a flood
- Drinking water and wastewater treatment plants
- Structures or facilities that produce, use, or store highly volatile, flammable, explosive, toxic, and/or water-reactive materials

Protecting Critical Facilities

For a critical facility to function, building systems and equipment must remain operational. Furthermore, it must be supplied with essential utilities (typically power, water, waste disposal, and communications, but occasionally natural gas and steam). The loss of municipal utilities has prevented some critical facilities from functioning during and immediately after major floods, and in some cases, loss of municipal water and



Figure 1: School elevated on columns

waste disposal has prevented facilities from operating for weeks after an event.

If at all possible, critical facilities should be located outside all high-risk flood hazard areas, including Zones V and A. Some communities do not permit critical or hazardous facilities or uses in the Coastal High Hazard Area (Zone V), the entire Special Flood Hazard Area (SFHA, or 1-percent-annual-chance flood hazard area), or the 0.2-percent-annual-chance flood hazard area (see Figure 2). If a critical facility must be located in a high-risk flood hazard area, it should be designed to higher protection standards and have flood evacuation plans.

Fire prevention, evacuation, and rescue operations are common emergency response activities associated with flooding. The effectiveness and success of these efforts depend on readily available access for emergency vehicles. However, streets and roads are usually the first to be inundated in the event of a flood.

What is Freeboard?

"Freeboard" is a factor of safety usually expressed in feet above a certain flood level, and is often applied to critical facilities. Freeboard (commonly 1-3 additional feet) compensates for the many unknown factors that could contribute to how high flood waters can rise, such as wave action, constricted bridge openings, and the hydrological effect of urbanization in the watershed.

"FEMA's mission is to support our citizens and first responders to ensure that as a nation we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards."

SECTION FOUR**Risk Assessment**

Table 4.4-1
Abbreviations and Costs Used for Critical Facilities and Infrastructure

| Abr. | Name | Building Type (where applicable) | Average Replacement Cost |
|------|--|----------------------------------|--------------------------|
| AIR | Airport facilities | s1l | 200,000,000 |
| BRDG | Bridges | n/a | 191,600 |
| BUS | Bus facilities | c1l | 2,000,000 |
| COM | Communication facilities and Utilities | c1l | 2,000,000 |
| ELEC | Electric Power facility | c1l | 10,000,000 |
| EMER | Emergency Centers, Fire Stations and Police Stations | c1l | 2,000,000 |
| GOVT | Government Office/Civic Center | c1l | 2,000,000 |
| HOSP | Hospitals/Care facilities | s1m | 100,000,000 |
| INFR | Kilometers of Infrastructure. Includes: | | |
| | Oil/Gas Pipelines (OG) | n/a | 300 |
| | Railroad Tracks (RR) | n/a | 860 |
| | Highway (HWY) | n/a | 3,860 |
| PORT | Port facilities | c1l | 20,000,000 |
| POT | Potable and Waste Water facilities | c1l | 100,000,000 |
| RAIL | Rail facilities | c1l | 2,000,000 |
| SCH | Schools | rm1l | 1,000,000 |

figure 3

SECTION FIVE**Goals, Objectives and Actions**

| | | |
|--|---|------------------------------|
| Goal 8: Reduce the possibility of damage and losses to existing assets, including people, critical facilities /infrastructure, and public facilities due to <u>landslide</u>. | | New, Existing or Both |
| Action 8.C.2 | Continue to streamline policies to eliminate conflicts and duplication of effort. | Both |
| Action 8.C.3 | Develop and publish evacuation procedures to the public. | Both |
| <i>Objective 8.D: Address identified data limitations regarding the lack of information about the relative vulnerability of assets from landslide.</i> | | |
| Action 8.D.1 | Identify hazard-prone structures through GIS modeling. | Both |
| Action 8.D.2 | Implement hazard awareness program. | Both |

| | | |
|---|--|------------------------------|
| Goal 9: Reduce the possibility of damage and losses to existing assets, including people, critical facilities/infrastructure, and public facilities due to <u>floods</u>. | | New, Existing or Both |
| <i>Objective 9.A: Develop a comprehensive approach to reducing the possibility of damage and losses due to floods.</i> | | |
| Action 9.A.1 | Continue to review and compare existing flood control standards, zoning and building requirements. | Both |
| Action 9.A.2 | Identify flood-prone areas by using GIS. | Both |
| Action 9.A.3 | Adopt policies that discourage growth in flood-prone areas. | Both |
| <i>Objective 9.B: Protect existing assets with the highest relative vulnerability to the effects of floods within the 100-year floodplain.</i> | | |
| Action 9.B.1 | Assure adequate funding to restore damaged facilities to 100-year flood design. | Both |
| Action 9.B.2 | Update storm water system plans and improve storm water facilities in high-risk areas. | Both |
| Action 9.B.3 | Plan for evacuation in case of major hazard event. | Both |
| <i>Objective 9.C: Coordinate with and support existing efforts to mitigate floods (e.g., US Army Corps of Engineers, US Bureau of Reclamation, and California Department of Water Resources).</i> | | |
| Action 9.C.1 | Develop a flood control strategy that ensures coordination with Federal, State and local agencies. | Both |
| Action 9.C.2 | Improve hazard warning and response planning. | Both |
| <i>Objective 9.D: Minimize repetitive losses caused by flooding.</i> | | |
| Action 9.D.1 | Identify those communities that have recurring losses. | Both |
| Action 9.D.2 | Develop project proposals to reduce flooding and improve control in flood prone areas. | Both |
| Action 9.D.3 | Acquire properties, when feasible, on floodway to prevent development. | Both |

From: [Claire Collins](#)
To: [Smith, Ashley](#); [Ochoa, Regina](#); [Mills, Benjamin](#); [Oberbauer, Sean](#); [Wardlaw, Mark](#)
Subject: Terr-Gen Lithium-Ion Battery storage PDS2020-STP-0-011
Date: Friday, August 7, 2020 10:22:48 AM

Comment E-1

This email is in opposition to the proposed Lithium-Ion Battery storage for Valley Center that looks like it was approved on some preliminary level. The letter sent by the Valley Center Planning Group Chairwoman brilliantly explains the facts and I am in full support of everything she has researched and written. To that I add my own concerns:

First off, Valley Center is a high fire hazard area with a history of fires. There is no good reason why this would be considered beneficial for the community. We all know even when encapsulated, the batteries will eventually corrode or catch fire. Terra-Gen said not if, but when they catch fire.

Comment E-2

We also know that the proposed site has a 100 year floodplain plan. Here we have yet another case of a developer overstepping the general plans and floodplains for capital gain, at the expense and safety of residents.

Comment E-3

If the batteries catch fire, and I've talked to high up employees of electric cars, it's a dirty little secret, the truth of batteries and what harm they can cause people and the economy. I think it's imperative you lay out all of the facts to the Valley Center Fire Protection District, clearly they've been misled. Dig deeper into this company and you will see issues and problems wherever they go.

There's a good chance it can seep into the ground water and cause vapors and illnesses such as cancer to the people of Valley Center and surrounding areas.

Comment E-4

This smells like Erin Brokovich and PG&E all over again.

It feels like Valley Center is treated like a "catch-all" community for projects deemed hazardous by other communities. It feels like the County doesn't know or understand that Valley Center is an Organic, boutique, western community with ranches and 4H and rodeos and strives to be realistic about responsible growth.

Please be the responsible County representatives we count on you to be and represent the interests of the people over revenue.

Thank you, Claire Collins

From: [Jennifer](#)
To: [Ochoa, Regina](#); [Roady, Jennifer](#)
Subject: Valley Center Energy Storage, PDS2020-STP-20-011, PDSXXXX-HLP-XXX, PDS2020-ER-20-08-005
Date: Friday, August 7, 2020 1:26:57 PM

TO: Planning & Development Services
 County of San Diego
 5510 Overland Ave, Suite 310
 San Diego, CA 92123

RE: Valley Center Energy Storage, PDS2020-STP-20-011,
PDSXXXX-HLP-XXX, PDS2020-ER-20-08-005

The following are a few comments/concerns regarding the proposed BESS facility at 29523 Valley Center Road, Valley Center, CA

One has to love the part whereby “public review is not required however any comment received will be accepted” Awesome! Not!

I am choosing to make my comments in “regular” language as opposed to the mumbo jumbo legalese throughout the public disclosure notice. The fact that the notice makes negative, harmful determinations and statements in such a matter of fact manner as if there is nothing to worry about, is disturbing to say the least.

For example, are you really calling the people and homes next to and in very close proximity to the project “sensitive receptors” WOW!!!! Not people/humans with homes and health concerns!!

The report is riddled with examples of harmful statements shrouded in matter of fact statements that seem to bear no real concern.

First, it has been well documented that these BESS facilities come with inherent fire hazards among a host of other safety deficiencies. One of the most prevalent being fire hazard. Valley Center is a known area of serious wildfire concern and yet, let’s just build a possible serious fire and health hazard right on a small acreage amid schools, local businesses and homes!

There have been numerous BESS mishaps due to “thermal runaway” and other fire hazard situations in the U.S. and around the globe. Arizona recently experienced serious fire situations from a BESS where numerous firefighters were injured, etc. due the chemical inhalation and intense heat from battery fire. See below a quote from an article on S&P Global Market:

“As projects proliferate, driven by demand for solutions to integrate intermittent renewables into grid operations and to offset the need for fossil fuels, the industry is being forced to acknowledge that fires, most of them linked to lithium-ion batteries, are occurring with troubling frequency.

Comment F-2
continued

Incidents over the past year include the blaze in Arizona along with more than 20 energy storage systems that have reportedly caught fire in South Korea, putting the world's hottest energy storage market on ice amid a safety probe. Fires linked to lithium-ion batteries also have hit Europe and Australia."

Comment F-3

Aesthetically, the BESS facility will obviously be an eyesore and "out of place" among the other rural homes and trees and vegetation, standing out like a sore thumb!

Comment F-4

Is it really necessary to "plug" that BESS installation right on a dangerous part of Valley Center road in between homes? The entrance to the project is one of the most dangerous local curves in Valley Center that has seen many accidents and fatalities. This sounds like a project ripe for the new Park Circle area development. Why not build something like this in a more remote location?

Comment F-5

This part of the scenic highway corridor is part of a beautiful valley and one of the reasons I moved to this part of Valley Center. Just because the SDGE facility is nearby is not an excuse to add more unsightly structures. Is it not bad enough that we have to deal with and look at the 54 acre solar site a half mile down the road? (Which already had a fire!) So, since we already have a few out of place structures, let's just add more??? Not to mention the proximity to the preschool, elementary school and homes.

Comment F-6

Granted this project is a money maker for Terra-Gen, etc. However, how is it even necessary at this point to provide electricity for 50K homes when we don't even have that many homes in the whole town of Valley Center? Doesn't Escondido already house one of the biggest BESS in the area? Aside from money what is the urgency to get this built? Why not find a location that isn't between homes and on the way to schools, Star Valley Park, casinos, mountain locations, etc. This is a main thoroughfare in Valley Center and this will definitely be an eyesore and possibly dangerous.

I understand the need for future renewable energy sources and the ability to store clean energy. I am not against the technology or ideology but I do have concerns with the urgency and the location of this project! May I remind you most folk don't have the time or energy to send in formal comments as they are busy working and paying bills, etc. Just know that I am not alone in my commentary.

Thank you for your time and consideration.

Sincerely,
Jason & Jennifer Boes
29566 Valley Center Road,
Valley Center CA 92082
760-468-4719

From: [Janna McGee](#)
To: [Smith, Ashley](#); [Ochoa, Regina](#); [Oberbauer, Sean](#); [Wardlaw, Mark](#); [Mills, Benjamin](#)
Subject: Lithium battery storage opposition, Valley Center
Date: Saturday, August 8, 2020 7:08:06 AM

Hello, I am writing to oppose battery storage being placed in our community of Valley center. If there is something further I need to do or can do to voice my opposition please let me know.

THANKS!



Comment G-1

From: [Katrina Pierce-Ubben](#)
To: [Smith, Ashley](#); [Ochoa, Regina](#); [Mills, Benjamin](#); [Oberbauer, Sean](#); [Wardlaw, Mark](#)
Subject: Valley Center Storage Project/Terra-Gen PDS2020-STP-02-011
Date: Saturday, August 8, 2020 7:27:30 AM

Re: Valley Center Storage Project/Terra-Gen PDS2020-STP-02-011

On Monday, July 13, 2020 the Valley Center Community Planning Group voted not to approve the Valley Center Storage Lithium-ion Battery Storage project presented by Terra-Gen. The vote against this project was overwhelming with eleven board members voting against the project and only three voting in favor with one abstention. We strongly request County and staff not recommend this project for approval. There are many reasons for this, but the most important is public safety. Placing this storage facility in Valley Center would create unacceptable risks to our community. One of these risks associated with lithium battery storage facilities is called thermal runaway. The systems are susceptible to rapid, uncontrolled overheating. It's a cycle of which excessive heat keeps creating more heat, and at high temperature gas builds up creating the potential for an explosion as well as the release of toxic gasses. These explosions are not just theory but, unfortunately, have been a reality at numerous facilities. Just nine months ago there was an explosion and fire at an energy facility near Phoenix, Arizona that injured four fire fighters and four site personnel. This resulted in Arizona Public Service shutting down two other facilities. Inexperience did not play a role in this fire. Neither did any obvious technical malfunction. "Things worked the way they were intended to work; and we still had an event," said John Zahurancik COO of Fluence, the energy storage company who built the Arizona facility. A utility regulator with the Arizona Corporation Commission, Sandra Kennedy, warned that lithium-ion battery for energy storage are not prudent and create unacceptable risks. Scott Bordenkircher, director of technology innovation and integration at Arizona Public Service said "I don't think it's realistic for any of us to think that we're never going to have another lithium-ion battery failure." The problem is not limited to Arizona. Hawaii and Vermont have had at least two fires of the same sort, and lithium-ion batteries have caused more than twenty storage complex battery fires in South Korea in the last three years alone. These battery fires are very intense and very difficult to control. They can take days or even weeks to extinguish properly and they can ignite or reignite days or often weeks after being extinguished. Water on a lithium battery fire leads to the release of hydrogen fluoride which is highly flammable and toxic to humans. There is enormous concern that a toxic, poisonous cloud could result that would not only affect humans and animals but could also contaminate groundwater. During the intense heat and winds of a Santa Ana condition our communities would be subjected to potential devastation that would reach far beyond Valley Center, Bonsall and Pauma Valley. Lithium-ion battery fires are also very hazardous to our firefighters and first responders. In addition to the immediate fire and electrical risks, they have close and intense exposure to toxic fumes, exposure to hazardous materials and building decontamination issues. Although Valley Center Fire may have signed off on general fire safety for this project, direct conversations with our fire chief and fire marshal reveal there are reservations on this project's impact on safety for our community. Several members of the VCCPG, me included, have had direct conversations with our fire chief and fire marshal on this project and have been told they had still not completed a thorough analysis of the submitted plans. Additionally, Chief Davidson indicated to us that Terra-Gen must show they are able to mitigate all the hazards of an international and adopted fire code. Whatever Terra-Gen plans to bring in to fight and prevent the spread of fire, Terra-Gen must purchase. And that is yet to be determined. How could this have been approved in April of 2020 when there is yet to be so much that has not been determined in regard to fire

Comment H-1

Comment H-2

Comment H-3

Comment H-3
continued

Comment H-4

safety with this project? There seems to be a disconnect between our fire personnel and the county. According to experts, energy storage is relatively early in its technologic maturation and incidents are to be expected. This is not what we want for Valley Center. Valley Center should not be a guinea pig for the county or state for an unmanned battery storage facility. The VCCPG strongly and emphatically does not want our community at risk for a potential explosion that would have disastrous ramifications. The risks and the potential for a catastrophic event if this project is allowed in Valley Center is real. And what reward would our community receive for this risk? None. That is why the VCCPG overwhelmingly voted against this project. Valley Center is absorbing all the risk countywide and statewide for a project of this enormity. Battery storage is changing regularly and lithium-ion is not the only solution for energy storage. Our community has endured several years of devastation from organic fires. Please don't add another variable of fire to our already high fire danger community. We have had too many close calls don't need to be in fear of furthering with fueling the fire!!!

Concerned citizen
Katrina Pierce
Valley Center, Ca

From: [Nita](#)
To: [Smith, Ashley](#); [Ochoa, Regina](#); [Mills, Benjamin](#); [Oberbauer, Sean](#); [Wardlaw, Mark](#)
Subject: Project/Terra-Gen PDS2020-STP-02-011
Date: Saturday, August 8, 2020 6:06:49 PM

Regina Ochoa Planning & Development Services
 5510 Overland Avenue #310 San Diego, CA 92123

Dear Ms's Smith and Ochoa, On Monday, July 13, 2020 the Valley Center Community Planning Group voted not to approve the Valley Center Storage Lithium-ion Battery Storage project presented by Terra-Gen. The vote against this project was overwhelming with eleven board members voting against the project and only three voting in favor with one abstention. We strongly request County and staff not recommend this project for approval. There are many reasons for this, but the most important is public safety. Placing this storage facility in Valley Center would create unacceptable risks to our community. One of these risks associated with lithium battery storage facilities is called thermal runaway. The systems are susceptible to rapid, uncontrolled overheating. It's a cycle of which excessive heat keeps creating more heat, and at high temperature gas builds up creating the potential for an explosion as well as the release of toxic gasses. These explosions are not just theory but, unfortunately, have been a reality at numerous facilities. Just nine months ago there was an explosion and fire at an energy facility near Phoenix, Arizona that injured four fire fighters and four site personnel. This resulted in Arizona Public Service shutting down two other facilities. Inexperience did not play a role in this fire. Neither did any obvious technical malfunction. "Things worked the way they were intended to work; and we still had an event," said John Zahurancik COO of Fluence, the energy storage company who built the Arizona facility. A utility regulator with the Arizona Corporation Commission, Sandra Kennedy, warned that lithium-ion battery for energy storage are not prudent and create unacceptable risks. Scott Bordenkircher, director of technology innovation and integration at Arizona Public Service said "I don't think it's realistic for any of us to think that we're never going to have another lithium-ion battery failure." The problem is not limited to Arizona. Hawaii and Vermont have had at least two fires of the same sort, and lithium-ion batteries have caused more than twenty storage complex battery fires in South Korea in the last three years alone. These battery fires are very intense and very difficult to control. They can take days or even weeks to extinguish properly and they can ignite or reignite days or often weeks after being extinguished. Water on a lithium battery fire leads to the release of hydrogen fluoride which is highly flammable and toxic to humans. There is enormous concern that a toxic, poisonous cloud could result that would not only affect humans and animals but could also contaminate groundwater. During the intense heat and winds of a Santa Ana condition our communities would be subjected to potential devastation that would reach far beyond Valley Center, Bonsall and Pauma Valley. Lithium-ion battery fires are also very hazardous to our firefighters and first responders. In addition to the immediate fire and electrical risks, they have close and intense exposure to toxic fumes, exposure to hazardous materials and building decontamination issues. Although Valley Center Fire may have signed off on general fire safety for this project, direct conversations with our fire chief and fire marshal reveal there are reservations on this project's impact on safety for our community. Several members of the VCCPG, me included, have had direct conversations with our fire chief and fire marshal on this project and have been told they had still not completed a thorough analysis of the submitted plans. Additionally, Chief Davidson indicated to us that Terra-Gen must show they are able to mitigate all the hazards of an international and adopted fire code. Whatever Terra-Gen plans to bring in to fight and prevent the spread of fire, Terra-Gen must purchase. And that is yet to be determined. How could this have been approved in April of 2020 when there is yet to be so much that has not been determined in regard to fire safety with this project? There seems to be a disconnect between our fire personnel and the county. According to experts, energy storage is relatively early in its technologic maturation and incidents are to be expected. This is not what we want for Valley Center. Valley Center should not be a guinea pig for the county or state for an unmanned battery storage facility. The VCCPG strongly and emphatically does not want our community at risk for a potential explosion that would have disastrous ramifications. The risks and the potential for a catastrophic event if this project is allowed in Valley Center is real. And what reward would our community receive for this risk? None. That is why the VCCPG overwhelmingly voted against this project. Valley Center is absorbing all the risk countywide and statewide for a project of this enormity. Battery storage is changing regularly and lithium-ion is not the only solution for energy storage. Our community has endured several years of devastation from organic fires. Please don't add another variable of fire to our already high fire danger community.

Comment I-1

1 - 304

Sincerely, Nita J Stuckwisch

Sent from my iPhone

From: [Kevin Smith](#)
To: [Smith, Ashley](#); [Ochoa, Regina](#)
Subject: Terra-Gen Battery Storage
Date: Sunday, August 9, 2020 11:56:06 PM

Hello,

I am a resident of Valley Center and do not object to a lithium-ion battery storage project being placed within our community. While there have been accidents at other sites, I believe that the industry has learned from each of those. Response directives have been modified and improved to address the possibility of fires.

The proponent of this particular facility has been in contact with our local Fire District and has reached an agreement to plan for, document and train firefighters to deal with problems that may arise. That process is in its early stages and while I feel it would be too soon to approve this project since they have not yet specified their particular type of technology, I do not doubt that the facility can be safely sited.

I am Vice Chair of the Valley Center Community Planning Group and do not agree with the opinions stated by our Chair in her letter of July 30. My opinions are my own and are not meant to represent the Planning Group.

Regards,
Kevin Smith

Comment J-1

John J. Corley
14535 Vesper Road (Property)
Valley Center, CA 92082
jyelroc1@gmail.com

August 10, 2020

Regina Ochoa, Project Manager
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123-1239
regina.ochoa@sdcounty.ca.gov

SUBJECT: VALLEY CENTER ENERGY STORAGE, PDS2020-STP-20-011, PDS2020-ER-20-08-005, PDSXXXX-HLP-XXX,

Dear Ms. Ochoa,

I want to show the stark differences between this project and another very similar project due to be completed in Fallbrook by 2021. It is called the AES Fallbrook 40 MW Battery Energy Storage System (PDS2019-ZAP-19-001).

AES FALLBROOK

- 40 MW from 16 BESS containers on 4.22 acres.
- Connects to 69-kV SDG&E Avocado substation 450 feet away.
- SDG&E will own and operate facility to provide reliability and flexibility to its grid.
- Parcel is not in a floodplain.
- Fallbrook Community Planning Group recommended project.

TERRA-GEN VALLEY CENTER

- 140 MW from 58 BESS containers on 8.9 acres.
Comment – 3 ½ times bigger, more suited for a city like Escondido than a town like Valley Center.
- Connects to 69-kV SDG&E VC substation 0.3 miles or 1,584 feet away.
Comment – 3 ½ times longer to connect, not an ideal site. Recent SDG&E BESS facilities are being built adjacent to their substations.
- Valley Center ESS, LLC will own and operate facility.
Comment – Owner will sell back stored energy to the highest bidder regionally for ROI. No benefit to VC residents.
- Parcel is in a known FEMA 100-year floodplain Zone A.
Comment – SDG&E stayed away from the same floodplain when siting their substation.

Comment K-1



- Valley Center Community Planning Group overwhelmingly denied recommendation.
Comment – Voted 3-11-1 due to public safety concerns.

Two similar concepts in unincorporated communities of Fallbrook and Valley Center with very different agendas. Terra-Gen is clearly trying to get their ROI (Return On Investment) on the \$40 million dollar price tag by siting as many battery containers they can get away with. Terra-Gen is trying a money-making venture in Valley Center using fear to sell its product with proceeds going to their umbrella corporation Energy Capital Partners. The residents of Valley Center deserve much better. Please consider this when it is time to decide on the Site Plan permit. Thank you for your time.

Respectfully,

John J. Corley

From: [RDVC](#)
To: [Ochoa, Regina](#); [Roady, Jennifer](#)
Cc: jim.desmond@sdccounty.ca.gov
Subject: Valley Center Energy Storage PDS-2020-STP-02-11
Date: Monday, August 10, 2020 2:06:43 PM

Madames Ochoa and Roady,

Comment L-1

Please forgive the informality of an email, I only became aware of this project within the last day, and due to the deadline for public comment needed to respond accordingly. My home and business are very near the proposed project. I did not receive notice from the county with regard to the project, perhaps that was only immediately adjacent properties. Nonetheless, it is unclear from the letter that was provided to me by a neighbor whether this project is subject to an environmental impact review, or any variances from CEQA. The letter states that the county intends to adopt findings, although it only states what the project will be, not whether the findings include any variances.

Comment L-2

I have several concerns related to this project. First, the obvious concern about fire safety and mobility on one of our major thoroughfares. With Valley Center already restricted to merely three exit routes had a wildfire situation, any potential for a large scale disaster along one of those thoroughfares becomes increasingly critical. Second, the location of the project is on one of the most dangerous curves in our entire community. There are multiple accidents here, many involving vehicles leaving the roadway - a potential hazard if they were to impact the project. Third, but perhaps most concerning, is the adjacency of homes, ranches, childcare centers and other public spaces. It is unclear how an industrial use such as this would be considered a fitting neighbor for a location that is clearly rural residential (notwithstanding the SDGE substation, but that was here long before our current General Plan). It appears the zoning is for industrial use, however, I do believe it's worth the county reviewing the adjacent properties and not just going with the zoning as it stands.

Comment L-3

At the very least, I respectfully request that the county allow further public review and input of this proposed project, including the opportunity to ask more detailed questions than we can find answers to on the Internet. I apologize that we missed the review at the community planning committee, advertising can be a bit light at times and we simply missed this one. At this time, there are multiple theories circulating around Valley Center on social media regarding what the project really is. Some state it is a lithium battery disposal site, that does not appear to be the case from the letter I saw, but the facts should be more widely shared to avoid confusion and eliminate concerns. Please know I am not anti-development, I am 100% in favor of smart development. As a homeowner and businesswoman, I believe it is in everyone's best interest to allow discourse and discussion. My family, including my elderly parents, my livestock, my property value and my livelihood could possibly be quite negatively impacted by this project and I would appreciate more information be made public before a vote is held. Thank you for your time and thoughtful attention to my concerns. You may reach me at (858) 531-8125 or via email. Our home physical address is 14637 Vesper Road, and we own two adjacent parcels off of Valley Center Road a mere three parcels from the proposed project site.

Glynn Hoekstra
 Rancho Descanso Valley Center