



County of San Diego

DAHVIA LYNCH
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 505-6445 General • (858) 694-2705 Codes
(858) 565-5920 Building Services
www.SDCPDS.org

VINCE NICOLETTI
ASSISTANT DIRECTOR

October 26, 2023

CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Title: Seguro Storage Project
Project Number(s): PDS2023-MUP-23-012
2. Lead agency name and address:
County of San Diego, Planning & Development Services (PDS)
5510 Overland Avenue, Suite 310
San Diego, CA 92123-1239
3.
 - a. Contact: Jae Roland-Chase
 - b. Phone number: (619) 380-3130
 - c. E-mail: jae.rolandchase@sdcounty.ca.gov
4. Project location:
The Project is located in unincorporated northeastern San Diego county (county) west of the Interstate (I-) 15 and State Route (SR-) 78 interchange (see Figure 1, Project Location and Figure 2, Project Site). The Project site comprises approximately 22.55 acres where the battery energy storage system (BESS) is proposed (herein referred to as the "BESS site") and an approximately 1-mile generation tie (gen-tie) line and associated gen-tie corridor to connect to the San Diego Gas & Electric (SDG&E) Escondido Substation (approximately 22.25 acres). Collectively, the BESS site and gen-tie corridor total approximately 44.80 acres (referred to as the Project site). As the Project moves through advanced design, the gen-tie corridor would be revised to a single route, but for the purposes of evaluating impacts, the entire corridor is being evaluated. The Project site is located within the San Dieguito Community Planning area and is bordered to the west by County Club Drive, between County Club Drive and Huston Ranch (a private road). Regional access would be provided by I-15 and SR-78. Primary local access would be provided via County Club Drive, a County maintained road.

5. Project Applicant name and address:
Seguro Storage, LLC
1420 Kettner Boulevard, Suite 312
San Diego, CA 92101
6. General Plan
Community Plan: San Dieguito Community Plan
Land Use Designation: Semi- Rural Residential (SR-2)
Density: 1 unit/2,4, or 8 gross acres
Floor Area Ratio (FAR): N/A
7. Zoning
Use Regulation: Limited Agricultural (A70)
Minimum Lot Size: 1 acre
Special Area Regulation: Palomar Airport Influence Area 2
8. Description of Project:

Seguro Storage, LLC (Applicant) is requesting a Major Use Permit from the County to construct, operate, and maintain a 400-megawatt (MW) battery storage facility in northeastern unincorporated San Diego County. The BESS site currently contains a mixed-used residential property, operated as an equestrian facility. The Project would include demolition of on-site structures, development of a BESS on approximately 22.55 acres of land encompassing 4 parcels and would interconnect to the SDG&E 230-kilovolt (kV) Escondido Substation via a proposed gen-tie line. It is anticipated that the gen-tie line would be located on undeveloped lands to the east of County Club Drive for a total distance of approximately 1 mile within a 150-foot-wide corridor totaling approximately 22.25 acres (herein referred to as the “gen-tie corridor”), a portion of which would traverse City of Escondido jurisdiction. The total Project inclusive of the BESS site and the gen-tie corridor would be approximately 44.80 acres.

The proposed Project would include the following primary components:

- Battery storage containers: Energy storage enclosures and appurtenances would be constructed that would provide energy storage capacity and dispatch for the electric grid. Battery enclosures would be up to 11 feet tall, 9 feet wide, and 40 feet long.
- Inverters and transformers: Power inverters to convert between alternative current (AC) and direct current (DC) would be included, along with transformers that would step up the voltage.
- On-site collector substation: The Project would step the electricity from the inverter-transformer up to the kV level of the transmission system, delivering it into the grid via a gen-tie line. The collector substation would be approximately 240 feet by 385 feet.
- A gen-tie -line would be constructed from the on-site collector substation to the SDG&E Escondido Substation. If overhead, approximately 6 poles structures not to exceed 120 feet tall would be constructed within the gen-tie corridor.

- A detention pond is proposed in the center of the BESS site to collect and process stormwater runoff.
- Access driveways: Six site access driveways and internal circulation would be developed on the BESS site.
- Supervisory Control and Data Acquisition (SCADA): One Control Enclosure for the SCADA system.
- Modular battery racks designed for ease of maintenance.
- Integrated heat, smoke, gas, and fire detection system.
- Perimeter security fencing and lighting. The entire BESS site perimeter would be secured with wood/chain-link/vinyl fencing and/or block/concrete walls, 6-10 feet high. Internal safety lighting would be installed in various locations throughout the BESS site.
- Improvements to the SDG&E Escondido Substation.
- Temporary construction laydown yard(s).

The proposed 230-kV gen-tie line would carry load to and from the on-site collector substation and the SDG&E Escondido Substation. The gen-tie line would be located on undeveloped lands to the east of County Club Drive and extend approximately 1 mile to the east from the Project's collector substation to the point of interconnection at the SDG&E Escondido Substation.

In addition to the Major Use Permit, the project may require other permits/approvals that may be discovered during project processing.

Construction

Construction of the Project is anticipated to occur over approximately 12 to 18 months and would consist of several construction phases. Construction phases would include site mobilization, demolition of existing structures, site preparation, grading, battery/container installation, substation installation, gen-tie installation, stormwater protections, and commissioning. Grading would be required throughout the entire development footprint. Grading is expected to result in 23,000 cubic yards of cut and 62,000 cubic yards of fill, which would result in a net import of 39,000 cubic yards of fill.

Decommissioning

The operational lifespan of the Project would be approximately 35 years after which time the facility would be decommissioned. Decommissioning of the facility would last approximately 12 months. Following decommissioning of the Project, the use of the land would return to a use that is consistent with the County of San Diego Zoning Ordinance. The land will remain vacant until it is repurposed in accordance with the County of San Diego Zoning Ordinance, following the 35-year operational lifespan of the Project.

9. Surrounding land uses and setting:

The Project site is located in northern unincorporated San Diego county. The San Dieguito Community Plan Area (CPA) within which the Project is located is a low-

density estate residential area surrounded by urbanizing areas.

Surrounding land uses include open space to the north; Country Club Drive and single-family residential to the east; single-family residential, open fields, and landscape features to the south; and equine training facilities and single-family residential to the west.

In the broader vicinity, the landscape encompasses a diverse array of land uses, including open spaces, commercial and warehouse developments, and the prominent Palomar Medical Center of Escondido. Moreover, the residential fabric of the area encompasses various styles, ranging from rural residential layouts and single-family home neighborhoods to mobile home parks.

10. Other public agencies whose approval is required or anticipated (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
General Construction Storm Water Permit	Regional Water Quality Control Board (RWQCB)
Stormwater Pollution Prevention Plan	RWQCB
Fire District Approval	County Fire Authority
Encroachment Permit	City of Escondido

Note: This is a non-exhaustive list of approvals that may change when the County begins the Environmental Impact Report.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there a plan that includes consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

YES

NO

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21080.3.2). Information is also available from the Native American Heritage Commission’s Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

Figure 1. Project Location

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Figure 2. Project Site

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a “Potentially Significant Impact” or a “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> <u>Aesthetics</u> | <input type="checkbox"/> <u>Agriculture & Forestry Resources</u> | <input checked="" type="checkbox"/> <u>Air Quality</u> |
| <input checked="" type="checkbox"/> <u>Biological Resources</u> | <input checked="" type="checkbox"/> <u>Cultural Resources</u> | <input checked="" type="checkbox"/> <u>Energy</u> |
| <input checked="" type="checkbox"/> <u>Geology & Soils</u> | <input checked="" type="checkbox"/> <u>Greenhouse Gas Emissions</u> | <input checked="" type="checkbox"/> <u>Hazards & Hazardous Materials</u> |
| <input checked="" type="checkbox"/> <u>Hydrology & Water Quality</u> | <input checked="" type="checkbox"/> <u>Land Use & Planning</u> | <input checked="" type="checkbox"/> <u>Mineral Resources</u> |
| <input checked="" type="checkbox"/> <u>Noise</u> | <input type="checkbox"/> <u>Population & Housing</u> | <input checked="" type="checkbox"/> <u>Public Services</u> |
| <input checked="" type="checkbox"/> <u>Recreation</u> | <input checked="" type="checkbox"/> <u>Transportation</u> | <input checked="" type="checkbox"/> <u>Tribal Cultural Resources</u> |
| <input checked="" type="checkbox"/> <u>Utilities & Service Systems</u> | <input checked="" type="checkbox"/> <u>Wildfire</u> | <input checked="" type="checkbox"/> <u>Mandatory Findings of Significance</u> |

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation:

- On the basis of this Initial Study, PDS finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- On the basis of this Initial Study, PDS finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- On the basis of this Initial Study, PDS finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature

Date

Printed Name

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). 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).
2. All answers must take account of the whole action involved, including offsite as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. **AESTHETICS** – Except as provided in Public Resources Code §21099 – Would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: 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.

Less Than Significant: The Project site is located 1 mile south of SR-78. The BESS site is located west of County Club Drive, south of Milpas Drive, and is bound by rural residential single-family homes to the north, east, and west and Huston Ranch, mixed-use residential, and agricultural land to the south. The BESS site currently contains a mixed-used residential property, operated as an equestrian facility. The Project would include several key components, including the installation of new battery storage containers for enhanced energy storage, inverters and transformers to facilitate energy conversion, an on-site collector substation for grid connection, an approximately 1-mile 230-kV gen-tie line, a detention pond and stormwater conveyance system, laydown yards, access driveways, and perimeter security fencing and lighting. The Project's impact on scenic vistas is anticipated to be less than significant due to its location and lack of visibility from designated scenic vistas. Elfin Forest Road / Harmony Grove Road is the nearest scenic corridor identified in the County's Scenic Highway System (County of San Diego 2011). The Project site is situated approximately 3.78 miles northeast of this corridor. Given the distance of the site location relative to Elfin Forest Road / Harmony Grove Road and intervening topography, it is not anticipated public views would be significantly impacted with the introduction of the Project. However, this location, among others, will be evaluated in the Project-specific visual analysis to be prepared for and discussed in the Draft Environmental Impact Report (DEIR) in order to analyze potential Project impacts to scenic vistas.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: 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 Impact: The proposed Project is not located along an officially designated or eligible state scenic highway as identified by Caltrans (Caltrans 2023). The nearest officially designated or eligible state scenic highway, as identified by Caltrans is SR 5, located approximately 10 miles west from the Project site. Therefore, the proposed Project would not impact scenic resources including, among other elements, trees, rock outcroppings, and historic buildings along an officially designated or eligible state scenic highway. Nonetheless, a comprehensive evaluation of potential impacts on these specific scenic resources within the context of a state scenic highway will be conducted as part of the more detailed analysis of Aesthetics presented in the DEIR.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: Visual character is the objective composition of the visible landscape within a viewshed; it 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.

Potentially Significant Impact: The Project includes the construction and operation of a BESS within the San Dieguito Community Plan area, in northeastern unincorporated San Diego county. The Project would introduce a BESS and associated infrastructure to the Project site, which is not found in the existing landscape. A Project-specific visual analysis will be prepared for and discussed in the DEIR to analyze potential impacts related to Project consistency with applicable zoning and other regulations governing scenic quality.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project would introduce a BESS and associated infrastructure to the Project site, which is currently utilized for residential and equestrian uses. Project implementation could result in a new source of substantial light or glare. Therefore, a Project-specific visual impact analysis will be prepared for and discussed in the DEIR to analyze potential impacts related to light and glare affecting day or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES – Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Project site is not designated by the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance. The Project site has been mapped as other lands as well as urban and built-up land. Therefore, the Project would not convert an important farmland category designated by the FMMP to a non-agricultural use. The Project site does not meet other criteria for the definition of an agricultural resource as defined by the County's Guidelines for Determining Significance for Agricultural Resources (Agricultural Guidelines; County of San Diego 2015), since the site is not an active agricultural operation and is not designated as an important farmland category by the FMMP. Therefore, according to the County's Agricultural Guidelines, the Project site is not considered an agricultural resource. This issue will not be further discussed in the DEIR.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Project site is not located within or in the vicinity of a Williamson Act Contract or Agricultural Preserve (County of San Diego 2006). The Project would be consistent with existing zoning and a rezone of the property is not proposed. Therefore, the Project would not conflict with the existing zoning for agricultural use, or a Williamson Act Contract. This issue will not be further discussed in the DEIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), or timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Project site does not contain forest land or timberland. The County of San Diego does not have any existing Timberland Production Zones. Therefore, Project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones. This issue will not be further discussed in the DEIR.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Project site does not contain any forest lands as defined in Public Resources Code §12220(g); therefore, Project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the Project site is not located in the vicinity of forest resources. This issue will not be further discussed in the DEIR.

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 or conversion of forest land to non-forest use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: As described above in Section II(a), while the Project site is compatible with agricultural use types due to its rural nature, the Project has been determined to not meet the definition of an agricultural resource pursuant to the County’s Agricultural Guidelines. In addition, the Project is not under a Williamson Act Contract or Agricultural Preserve, nor is the Project site located within the vicinity of a Williamson Act Contract or an Agricultural Preserve. Therefore, the Project would not have significant adverse impacts related to the conversion of Important Farmland or other agricultural resource to a non-agricultural use. In addition, as described above in Section II(c) and (d), the Project would not result in the loss of forest land or conversion of forest land to non-forest use. However, this issue will be further addressed in the DEIR.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. 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 checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project site is located within the San Diego Air Basin and is subject to the San Diego Air Pollution Control District (SDAPCD) Guidelines and regulations. The RAQS relies on population and projected growth in the County and projects future mobile, area, and all other source emissions. Based on these emissions, the RAQS determines 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 the County. As such, projects that are consistent with the growth anticipated in the General Plan would be considered consistent with the RAQS.

The Project may conflict with or obstruct implementation of the RAQS and SIP because the Project requires a Major Use Permit. A Project-specific air quality study will be prepared for and discussed in the DEIR to identify and address and direct and/or cumulative air quality impacts resulting from the Project, specifically construction.

b) 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?

- | | |
|--|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> | |

Less Than Significant With
Mitigation Incorporated

No Impact

Discussion/Explanation: Currently, San Diego County is in “non-attainment” status for the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) federal and state Ozone (O₃) and state Particulate Matter less than or equal to 10 microns and less than or equal to 2.5 microns (PM₁₀ and PM_{2.5}). O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (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 in both urban and rural areas include the following: 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 SDAPCD does not provide quantitative thresholds for determining the significance of construction or mobile source-related air emission impacts. However, the SDAPCD does specify screening-level thresholds (SLTs) that trigger an Air Quality Impact Analysis (AQIA) for new or modified stationary sources (SDAPCD Rules 20.2 and 20.3). If these SLTs for stationary sources are exceeded, an AQIA must be performed for the proposed new or modified stationary source. Although these SLTs levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions, which would be discharged to the San Diego Air Basin from proposed land development projects. For projects whose stationary source emissions are below these SLTs, no AQIA is typically required, and project level emissions are presumed to be less than significant.

For CEQA purposes, these SLTs, shown in Table 1, can be used to determine if a project’s total emissions would result in a significant impact to air quality.

Table 1. San Diego County Screening-Level Thresholds for Air Quality Impact Analysis

Pollutant	Total Emissions		
	Lbs. per Hour	Lbs. per Day	Tons per Year
Respirable Particulate Matter (PM ₁₀)	---	100	15
Fine Particulate Matter (PM _{2.5})	--- *	55	10*
Nitrogen Oxides (NO _x)	25	250	40
Sulfur Oxides (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75**	13.7***

Notes: * The U.S. Environmental Protection Agency “Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards” published September 8, 2005. Also used by the South Coast Air Quality Management District (SCAQMD).

** Threshold for VOCs based on the threshold of significance for VOCs from the SCAQMD for the Coachella Valley.

*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2,000 lbs/ton.

Potentially Significant Impact: Air quality emissions associated with the Project could exceed

County of San Diego SLTs during construction activities, specifically grading, and operational activities primarily from battery off-gassing. Any exceedance of SLTs could cumulatively contribute to a net increase of a criteria air pollutant or precursor emissions for which the San Diego Air Basin is in nonattainment under the NAAQS and/or CAAQS. Therefore, the Project may contribute to a cumulatively considerable net increase of criteria pollutants for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard. A Project-specific air quality study will be prepared for and discussed in the DEIR to identify and address any direct and/or cumulative air quality impacts resulting from the Project.

c) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County also considers residences as sensitive receptors since they house children and the elderly.

Potentially Significant Impact: Grading and construction activities associated with the proposed development could expose sensitive receptors to substantial pollutant concentrations. A Project-specific air quality analysis will be prepared for and discussed in the DEIR to analyze the Project's potential to expose sensitive receptors to substantial pollutant concentrations.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Odors from the emission of diesel fumes and other odors typically associated with construction activities could result from Project construction. Given that there are sensitive receptors in proximity to the Project site, potentially significant impacts could occur. Odor impacts are unlikely during Project operations. Construction impacts related to odor will be discussed further in the DEIR.

IV. BIOLOGICAL RESOURCES – Would the project:

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

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Sensitive or special status species occur or have the potential to occur within the Project site. Therefore, the Project has the potential to directly and indirectly impact candidate, sensitive, and/or special status species. A Project-specific biological resources analysis will be prepared for and discussed in the DEIR to analyze potential impacts to candidate, sensitive, or special status species.

- 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 checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project has the potential to have an adverse effect on riparian and other sensitive natural communities. Therefore, a Project-specific biological resources report will be prepared for and discussed in the DEIR to identify and address any direct and/or cumulative impacts to sensitive natural communities resulting from the Project.

- 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 checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project site is not anticipated to contain federally protected wetlands as defined by the Section 404 of the Clean Water Act, nor is it anticipated to contain aquatic features that could qualify as waters of the state. Therefore, the Project is not expected to cause a substantial adverse effect on state or federally protected water or wetland. However, the Project applicant is conducting consultations with the regulatory agencies to verify the results and conclusions of the aquatic resources delineation. Additionally, a Project-specific biological resources report, including an aquatic resources delineation, will be prepared for and discussed in the DEIR to identify and address any direct and/or cumulative impacts to state or federally protected water or wetlands.

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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: The Project site is located in a semi-urbanized community in proximity to the I-15 and SR-78 freeways. The BESS site is currently developed with structures and equine training facilities, including fences and gates. Therefore, wildlife movement through the area is limited and wildlife movement would not be substantially altered with introduction of the proposed Project. A Project-specific biological resources analysis will be prepared for and discussed in the DEIR to analyze potential Project impacts to wildlife movement.

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed Project preliminarily evaluated 13 properties over 45 years of age located in the Project vicinity for historical and architectural significance. The 13 properties are preliminarily recommended as not eligible for listing in the California Register of Historical Resources (CRHR) or the Local Register and do not qualify as significant historic sites under the County's Resource Protection Ordinance, nor as historic resources under CEQA. Therefore, the Project would not cause a substantial adverse change

in the significance of a historical resource. The significance of any historical resources will be evaluated within a Project-specific cultural resources report prepared for and discussed in the DEIR to identify and address any direct and/or cumulative impacts to cultural resources that result from the Project.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Archaeological resources may be located within the Project site. Therefore, the Project has the potential to cause a substantial adverse change of an archaeological resource during ground-disturbing construction activities. The significance of any archaeological resources found will be evaluated within a Project-specific cultural resources report prepared for and discussed in the DEIR to identify and address any direct and/or cumulative impacts to cultural resources that result from the Project.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project area could contain interred human remains. The potential for disturbance of human remains will be evaluated within a Project-specific cultural resources report prepared for and discussed in the DEIR to identify and address any direct and/or cumulative impacts to cultural resources that result from the Project.

VI. ENERGY – 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 checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact. The Project would result in the use of electricity, natural gas, petroleum, and other consumption of energy resources during the construction and operation phases of the project. Overall energy use throughout the region is expected to be reduced throughout the operation of the BESS through mechanisms such as peak shaving, load balancing, renewable energy integration, grid reliability, efficiency improvements, and the reduction of transmission and distribution losses. Additionally, wasteful and inefficient use of energy is not expected to result. Although the Project is expected to reduce energy use throughout the region, potential impacts due to inefficient, wasteful, and unnecessary consumption of nonrenewable energy will be evaluated further in the DEIR.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact. In 2002, California established its Renewables Portfolio Standard (RPS) Program with the goal of increasing renewable energy in the state's electricity mix over time through a subsequent series of Senate Bills (SB) and Executive Orders (EO). California eventually passed SB 100 which established a 50 percent renewable resources target by December 31, 2026, and a 60 percent target by December 31, 2030. SB 100 further requires 100 percent carbon-free energy by 2045.

In 2016, the California Public Utilities Commission (CPUC) issued Decision 16-06-055 revising the Self-Generation Incentive Program pursuant to SB 861, Assembly Bill (AB) 1478 and implementing other changes. This decision formally adopted three overarching goals for the Self-Generation Incentive Program:

- Environmental: The reduction of greenhouse gases (GHGs), the reduction of criteria air pollutants, and the limitation of other environmental impacts such as water usage.
- Grid Support: (1) Reduce or shift peak demand, (2) improve efficiency and reliability of the distribution and transmission system, (3) lower grid infrastructure costs, (4) provide ancillary services, and (5) ensure customer reliability.
- Market Transformation: The Self-Generation Incentive Program should support technologies that have potential to thrive in future years without rebates.

BESS facilities help to achieve the goals of CPUC Decision 16-06-055 in the following manner:

- Environmental: By storing energy during peak power generation and providing power during peak demand, BESS facilities enable deeper penetration and integration of renewable resources into the grid, thereby reducing GHG emissions from fossil fuel generation.

- Grid Support: BESS facilities can reduce peak demand by providing power on demand, provide grid stability by providing instantaneous power to address frequency instability, lower grid infrastructure costs by reducing loads on overloaded transmission systems, and ensure customer reliability by balancing peak demand and peak generation through load shifting.

Therefore, the Project is in alignment with state objectives pertaining to renewable energy and energy efficiency. This issue will undergo comprehensive analysis within the context of the DEIR.

VII. GEOLOGY AND SOILS – Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 2018, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault (see Figures 1 and 2; County of San Diego 2007b). Additionally, construction and operation of a BESS facility and installation of a gen-tie line would not induce fault rupture of any recognized earthquake fault. Implementation of the Project would also not introduce any new habitable structures or buildings; therefore, the Project would not expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. To ensure that all structures included on the Project site have structural integrity, the Project must conform to the Seismic Requirements as outlined within the County's Grading Ordinance and the California Building Code (CBC). Nonetheless, given the seismically active nature of southern California, the potential for exposure to potentially significant seismic impacts will be evaluated in the DEIR.

- ii. Strong seismic ground shaking?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Construction and operation of a BESS facility and installation of a gen-tie line would not induce strong seismic ground shaking. To ensure that all structures included on the Project site have structural integrity, the Project must conform to the Seismic Requirements as outlined within the County’s Grading Ordinance and the CBC. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Therefore, compliance with the CBC and the County Code ensures the Project will not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking. Additionally, implementation of the Project would not introduce any new habitable structures or buildings; therefore, the Project would not expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Nonetheless, given the seismically active nature of southern California, this topic will be evaluated in the DEIR.

iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Project site is not located within a “Potential Liquefaction Area” as identified on Figure 4, Potential Liquefactions Areas of the County’s Guidelines for Determining Significance for Geologic Hazards (Geologic Hazards Guidelines; County of San Diego 2007b). Additionally, because the Project would construct and operate a BESS and would not include habitable structures, the Project would not expose people to the risk of loss, injury, or death involving susceptible to ground failure, including liquefaction. Nonetheless, given the seismically active nature of southern California, this topic will be evaluated in the DEIR.

iv. Landslides?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Project site is not located within a “Landslide Susceptibility Area” as identified on Figure 5, County Landslide Susceptibility Areas of the County’s Geological Hazards Guidelines (County of San Diego 2007b). Furthermore, given that the Project would construct and operate an unoccupied BESS and would not include habitable

structures, the Project would not expose people to the risk of loss, injury, or death involving landslides. Nonetheless, this topic will be evaluated in the DEIR.

b) Result in substantial soil erosion or the loss of topsoil?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Soil erosion may result during construction of the Project during grading and other ground-disturbing activities when surface soils are excavated and potentially exposed to wind events or come into contact with a water source causing erosional effects. As such, the Project would develop a Stormwater Management Plan (SWPPP) that will detail how erodible soils would be protected during grading, construction, and operation of the proposed BESS. The SWPPP will identify site-specific best management practices (BMPs) to manage erosion, sediment, and other potential construction-related pollutants from entering downstream waterbodies. This issue will be further evaluated in the DEIR.

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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: As discussed in Section VII(b) and (c) above, the Project would not be located in a known potential liquefaction area or known landslide area as identified by the County's Geological Hazards Guidelines (County of San Diego 2007b). Adherence to regulatory standards including the County's Watershed Protection Ordinance (WPO), Grading Ordinance, and CBC would be required and would further reduce the potential for Project impacts associated with hazards or risk related to landslide, lateral spreading, subsidence, liquefaction or collapse. Additionally, the Project would not exacerbate existing underlying hazards or risk related to landslide, lateral spreading, subsidence, liquefaction or collapse. However, this environmental issue will be further evaluated in the DEIR.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: As shown in the County of San Diego Geologic Hazards Guidelines (Figure 6, Potential Expansive Soils), the Project site may contain expansive soils (County of San Diego 2007b, 2011), as defined by Table 18-1-B of the Uniform Building Code (1994). The soils on site are mostly Vista coarse/rocky sandy loams as identified in the Soil Survey for the San Diego Area (Conservation Biology Institute 2011). This issue will be further evaluated within the DEIR.

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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The BESS site would maintain existing septic tanks which are adequately supported by existing site soils; however, existing on-site septic systems may require abandonment and closure in accordance with County standards prior to Project construction. The Project does not propose the installation of new septic tanks or other alternative wastewater disposal systems. The Project's avoidance of new septic installations and adherence to County standards and requirements in the event abandonment of existing facilities is necessary would result in less than significant impacts. Regardless, this issue will be discussed further in the DEIR.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world.

However, some features stand out as being unique in one way or another within the boundaries of the County.

Less than Significant Impact: A review of Paleontological Resources including the geological data and paleontological resources maps for San Diego County determined that the Project area, nestled within an area of established residential and commercial development, encompasses late Holocene alluvial floodplain deposits and early to middle Cretaceous plutonic igneous bedrock. Records indicate a low potential for paleontological resource discovery within these formations. In the unlikely event of discovering such resources during construction, proper measures, including involving a qualified paleontologist in adherence with established guidelines, would be taken. Therefore, impacts would be less than significant. Regardless, this issue will be discussed further in the DEIR.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: GHG emissions 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 in buildings as well as 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, and 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 project when the incremental contribution of those emissions may be cumulatively considerable.

Potentially Significant Impact: A regional GHG inventory prepared for the San Diego Region

(Energy Policy Initiatives Center and Ascent Environmental Inc. 2017) identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 45 percent of the total regional emissions. Electricity and natural gas combustion were the second (24 percent) and third (9 percent) largest regional contributors, respectively, to regional GHG emissions.

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 will 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.

In 2006, the State of California passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the GHG emissions reduction goal for the state into law. The law requires that by 2020, state emissions must be reduced to 1990 levels by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions.

SB 32 and AB 197 (enacted in 2016) are companion bills that set a new statewide GHG reduction target; make changes to the California Air Resources Board's (CARB's) membership and increase legislative oversight of CARB's climate change-based activities; and expand dissemination of GHG and other air quality-related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030.

AB 2514 (enacted in 2010) is designed to encourage California to incorporate energy storage into the electricity grid, as codified at Public Utilities Code § 2835-2839 and § 9506. Energy storage can provide a multitude of benefits to California, including supporting the integration of greater amounts of renewable energy into the electric grid, deferring the need for new fossil-fueled power plants and transmission and distribution infrastructure, and reducing dependence on fossil fuel generation to meet peak loads. The California Public Utilities Commission set an energy storage procurement framework with a 1,325 GW investor-owned utilities storage target by 2020. Since then, California's three largest investor-owned utilities have procured or are seeking approval to procure 1,500 MW or energy storage by 2024 (CEC 2018). The state's commitment to renewable energy and carbon reduction has intensified with the enactment of SB 100 in 2018, which mandates that 60 percent of retail electricity be sourced from renewables and all electricity be procured from 'zero-carbon' sources by 2045. Furthermore, Governor Brown's EO B-55-18 establishes a statewide objective of achieving carbon neutrality by 2045, with a subsequent focus on achieving net negative greenhouse gas emissions. Considering these ambitious goals, AB 2514 has continued to play a pivotal role in promoting energy storage solutions and grid resiliency to support California's transition to a more sustainable and carbon-neutral energy future.

In 2022, the state enacted AB 1279 with a goal to achieve net zero GHG emissions no later than 2045, which is quantified as a reduction of anthropogenic emissions (i.e., emission from

human activities) of 85 percent below 1990 levels no later than 2045. The California Air Resources Board (CARB) adopted the 2022 Scoping Plan to achieve this state target.

Development of the Project would result in emissions associated with construction operations and vehicular movements. Emissions from the construction activities are anticipated to be minimal and temporary.

Operational emissions are anticipated to be minimal and would be generated from vehicle trips for ongoing operation and maintenance activities. The proposed Project consists of a 400 MW BESS that will store energy. Therefore, the Project promotes the establishment of energy storage through the use of renewable sources, replacing conventional fossil fuel-based electricity generation and thus yielding enduring improvements in air quality. The Project is expected to offset GHG emissions by serving as a long-term renewable energy source, resulting in a decrease in overall emissions attributable to electrical generation in California, and assisting the state in meeting its 50 percent by 2030 and 60 percent by 2045 RPS, which was put in place by SB 350 and SB 100. Additionally, the Project aligns with the objectives of AB 2514, further reinforcing its role in advancing renewable energy and energy storage solutions in California. Regardless, a Project-specific climate change analysis will be prepared, and this topic will be further discussed in the DEIR.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Building upon the points addressed in Section VIII(a) above, the Project is not anticipated to impede the implementation of any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. This includes AB 32 and AB 2514, both of which advocate for GHG reduction and the integration of renewable energy and energy storage solutions. Regardless, a Project-specific climate change analysis will be prepared, and this topic will be discussed in the DEIR.

IX. 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?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project includes the construction and operation of a BESS, which would include the installation of new battery storage containers for enhanced energy storage, inverters and transformers to facilitate energy conversion, an on-site collector substation for grid connection, an approximately 1-mile 230-kV gen-tie line, a detention pond and stormwater conveyance system, laydown yards, access driveways. However, the Project would not result in a significant hazard to the public or environment because all storage, handling, transport, emission, and disposal of hazardous substances would be in full compliance with local, state, and federal regulations. California Government Code Section 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapters 6.95, Article 2, Sections 25500-25520.

A variety of hazardous substances and wastes would be transported to and stored, used, and handled on the Project site throughout construction. These would include fuels for construction equipment and vehicles, motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials. However, construction activities would be short term and the types of materials that would be routinely involved are not considered acutely hazardous.

The proposed battery storage containers would contain lithium ion batteries that are classified as a Class 9 hazardous material. As such, the U.S. Department of Transportation's Hazardous Material Regulations (49 CFR 171-180) would be followed during transport of these materials. In addition, under United Nations identification number, UN3536, "Lithium batteries installed in cargo transport units," the batteries must pass UN38.3 tests which prevent overcharge and over discharge between batteries, and no additional hazardous cargo is allowed that is not directly related to the transport of the batteries. UN38.3 compliance would allow certification for safe transport in air, land, or sea. Thus, impacts from the transport of lithium ion batteries are anticipated to be less than significant.

The San Diego County Department of Environmental Health – Hazardous Materials Division (DEH HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The hazardous materials business plan is required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of on site. The plan also contains an emergency response plan which describes the procedures for mitigating a hazardous materials release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Therefore, due to the requirements which regulate hazardous substances outlined above and the fact that the initial planning, ongoing monitoring, and inspections will occur in compliance with local, state, and federal regulation, the Project is not anticipated to result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances. However, due to the hazardous material composition of utility-scale battery storage units and the limited potential of battery unit rupture or a thermal runaway event, this topic will be further discussed in the DEIR.

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

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project includes the construction and operation of a BESS, which would be comprised of various hazardous materials. Although the Project would adhere to the requirements that regulate hazardous materials and would be in compliance with local, state, and federal regulations the Project could create a significant hazard to the public through the limited potential for upset and/or accidental conditions involving the release of hazardous materials due to battery unit rupture or a thermal runaway event. Thus, this environmental issue will be further evaluated in the DEIR.

- c) 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: There are no schools located within 0.25-mile of the Project site. The nearest school to the Project site is Community Montessori, approximately 1 mile northeast. Additionally, two license-exempt day care facilities were identified within 0.25 miles of the Project. License-exempt day care facilities, in some cases, may provide services only to relatives or only one family in addition to the operator's own children. It is important to note that these facilities, although license-exempt, may have different regulatory requirements and capacity allowances compared to state-licensed day care facilities. State-licensed day care facilities in California can typically have up to 14 children in their care, subject to state regulations. The identified day care facilities are:

- Little Eva’s Preschool – Operated from a residence approximately 900 feet east southeast of the Project site at 842 Chateau Pl, Escondido, CA; and
- Just for Kids Family Child Care – Operated from a residence approximately 1,400 feet south of the Project site.

The transport and handling of minor amounts of hazardous materials during construction would comply with all applicable federal, state, and local regulations that control hazardous material handling. Nevertheless, this environmental issue will be discussed further in the DEIR.

d) 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 checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Based on an initial regulatory database search, the Project site is not included in the State of California Hazardous Waste and Substances site list (Department of Toxic Substances Control 2018). Additionally, the Project site is not located within 1,000 feet of a Formerly Used Defense Site (FUNDS). A more thorough search of all hazardous sites compiled pursuant to Government Code Section 65962.5 will be included as part of a Project-specific Phase 1 ESA prepared for the Project. Therefore, hazardous materials sites will be discussed further in the DEIR.

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 result in a safety hazard or excessive noise for people residing or working in the project area?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Project is situated more than two miles away from any public Airport Influence Area, Airport Safety Zone, Avigation Easement, Overflight area, or Federal Aviation Administration Height Notification Surface area. The closest public airport, McClellan-Palomar Airport, is approximately 8.4 miles to the west of the Project site. As the Project would be operated remotely, it is anticipated that there will be no considerable risk to individuals in the vicinity of the Project in terms of safety hazards or excessive noise emissions. Moreover, the Project does not involve the construction of any structures that could pose a safety risk to

aircraft or disrupt airport/heliport operations. Therefore, there will be no impact and this issue will not be discussed further in the DEIR.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

The following sections summarize the Project's consistency with applicable emergency response plans or emergency evacuation plans.

i. SAN DIEGO COUNTY OPERATIONAL AREA EMERGENCY PLAN AND MJHMP:

Discussion/Explanation:

Less Than Significant Impact: The Operational Area 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 MJHMP 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 will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Nonetheless, this environmental issue will be further evaluated in the DEIR.

ii. UNIFIED SAN DIEGO COUNTY EMERGENCY SERVICES ORGANIZATION
AREA HAZARDOUS MATERIALS PLAN: OIL SPILL CONTINGENCIES
ELEMENT

Discussion/Explanation:

No Impact: The Oil Spill Contingency Element would not be interfered with because the Project is not located along the coastal zone or coastline. Therefore, no impact would occur. This issue will not be further discussed in the DEIR.

iii. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY
SHORTAGE RESPONSE PLAN

Discussion/Explanation:

Potentially Significant Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan could be interfered with because the Project includes the alteration of

energy supply infrastructure. The potential for the Project to impair implementation of or physically interfere with these plans will be analyzed in the DEIR.

v. DAM EVACUATION PLAN

Discussion/Explanation:

No Impact: The Project is not located within a dam inundation zone; therefore, it would not interfere with the Dam Evacuation Plan.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project is located within a California Department of Forestry and Fire Protection (CAL FIRE) designated as both High and Moderate Fire Hazard Severe Zone (FHSZ) (CAL FIRE 2023). The Project would be required to comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in the County. Additionally, given that the Project would construct and operate a battery storage facility, the Project would not include occupied or habitable structures that would expose people or structures to significant risks. Additionally, because the Project contains a high concentration of electrical equipment as well as a greater number of ignition sources on the site, a Project-specific Fire Protection Plan will be prepared for and discussed in the DEIR to determine the Project's potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires.

X. HYDROLOGY AND WATER QUALITY – Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project site may contain jurisdictional aquatic features, and the Project may propose discharges (in the form of soil material) to those areas during the construction phase of the Project. If this occurs, the Project may be required to obtain a General Construction Storm Water Permit, and Waste Discharge Requirements Permit from

the San Diego Basin RWQCBs. Development of the BESS facility and substation would increase the total area of impervious surfaces across the Project area, which could result in an increase in peak runoff. Therefore, the Project could potentially result in an increase in stormwater runoff and pollutant discharge. A Project-specific Stormwater Quality Management Plan (SWQMP) will be prepared for and discussed in the DEIR to determine the Project's compliance with regulations pertaining to water quality and waste discharge.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project would create water demand during construction and operation of the Project site. Additionally, construction of the BESS facility and substation would increase the total area of impervious surfaces across the Project area, which could interfere with groundwater recharge at the site. As such, the Project has the potential to decrease groundwater supplies and interfere with groundwater recharge. A SWPPP will be prepared for the Project that will address BMPs to ensure that potential pollutants will be reduced in any runoff to the maximum extent practicable so as not to impact receiving waters. The Project's impacts on groundwater supplies and recharge will be further discussed in the DEIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surface, in a manner which would:

i. result in substantial erosion or siltation on- or offsite;

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project could result in the alteration of the existing drainage pattern resulting in erosion or siltation. A SWPPP will be prepared for the Project that will identify all necessary BMPs to prevent significant impacts to water quality and ensure potential pollutants would be reduced in any runoff to the maximum extent practicable so as not to impact receiving waters. This topic will be discussed further in the DEIR.

- ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project site is currently occupied by equestrian-use structures and a single-family residence. Construction of the BESS facility and substation would increase the total area of impervious surfaces across the Project area, which could result in an increase in peak runoff. A Project-specific Drainage Study will be prepared for and discussed in the DEIR to determine the Project's potential impact on drainage patterns across the site and surrounding area, which could result in flooding.

- iii. 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; or

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project site is currently occupied by equestrian-use structures and a single-family residence. Construction of the BESS facility and substation would increase the total area of impervious surfaces across the Project area, which could result in an increase in peak runoff. A Project-specific Drainage Study will be prepared for and discussed in the DEIR to determine the Project's potential impacts on drainage patterns across the site and surrounding area related to capacity of the stormwater drainage systems.

- iv. impede or redirect flood flows?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project would include development that may impede or redirect flood flows. A SWPPP will be prepared for the Project that will identify all necessary BMPs to prevent significant impacts to water quality and ensure potential pollutants would be

reduced in any runoff to the maximum extent practicable so as not to impact receiving waters. This topic will be discussed further in the DEIR.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

i. FLOODING

Discussion/Explanation:

Less Than Significant Impact: The Project site is not located near a mapped dam inundation area for a major dam/reservoir within San Diego County. Additionally, the Project site is not located within a Flood Hazard area. A Project-specific Drainage Study will be prepared for and discussed in the DEIR to determine the Project's potential to result in a release of pollutants due to inundation.

ii. TSUNAMI

Discussion/Explanation:

No Impact: The Project site is located more than one mile from the coast; therefore, in the event of a tsunami, the Project would not be inundated. This issue will not be further discussed in the DEIR.

iii. SEICHE

Discussion/Explanation:

No Impact: The Project site is not located along the shoreline of a lake or reservoir; therefore, could not be inundated by a seiche. This issue will not be further discussed in the DEIR.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project could potentially result in an increase in

stormwater runoff and pollutant discharge, which could conflict with the San Diego Basin Plan. The Project would also result in an increase in impervious surfaces that could affect groundwater recharge in the area. Therefore, the Project could conflict with or obstruct implementation of a sustainable groundwater management plan. Potential impacts to groundwater recharge and water quality will be further discussed in the DEIR.

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The Project involves construction and operation of a BESS on approximately 22.55 acres with an additional 22.25-acre corridor evaluated for installation of the gen-tie line within a semi-rural area of unincorporated San Diego County. The vicinity surrounding the Project site primarily comprises open spaces, commercial and warehouse areas, as well as various residential developments, such as rural residential zones, single-family neighborhoods, and mobile home parks. While the proposed Project would include construction of an industrial battery storage facility, the scale of the Project would not substantially divide an established community. However, this issue will be further evaluated in the DEIR.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project includes the construction and operation of a battery storage facility. The Project is anticipated to assist in 1) achieving the state's RPS, as mandated under the 100 Percent Clean Energy Act of 2018 (SB 100), by developing and constructing California RPS-qualified renewable energy resources; 2) achieving or exceeding its energy storage targets, consistent with the terms of AB 2514; and 3) achieving its GHG reduction targets, consistent with AB 32, SB 32, and AB 1279.

The Project is subject to the San Dieguito Community Plan. The existing General Plan Land Use Designation is the Semi-Rural Residential (SR-2). Additionally, the Project is subject to

Limited Agriculture Use Regulation. The proposed land use to construct the BESS would be permitted under a Major Use Permit. Nevertheless, this issue will be discussed further in the DEIR.

XII. 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The California Department of Conservation – Division of Mines and Geology has not classified the land within the Project site. No alluvium or mines are present on the Project site. The Project site is within Mineral Resource Zone 3 (MRZ-3) as designated in the County’s General Plan. MRZ-3 areas contain known mineral deposits that may qualify as mineral resources and could result in the reclassification of specific localities into the MRZ-2 category. Although the Project site is within MRZ-3, Figure CE-6, Generalized Mineral Land Classification of the Conservation Element of the County’s General Plan depicts that there are no known mineral resource deposits within the Project site (County of San Diego 2008). Further, the Project site is surrounded by developed residential land uses which would be incompatible with future extraction of mineral resources on the Project site. A future mining operation at the Project site would create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, this environmental issue will not be further evaluated in the DEIR.

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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The California Department of Conservation – Division of Mines and Geology has not classified the land within the Project site. No alluvium or mines are present on the Project site. The Project site is within Mineral Resource Zone 3 (MRZ-3). MRZ-3 areas contain known mineral deposits that may qualify as mineral resources and could result in the reclassification of specific localities into the MRZ-2 category. Although the project site is within MRZ-3, Figure CE-6 of the County’s General Plan Conservation Element shows that there are no known mineral resource deposits within the Project site (County of San Diego

2008). Further, the Project site is surrounded by developed residential land uses which would be incompatible with future extraction of mineral resources on the Project site. A future mining operation at the Project site would create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. This environmental issue will be further evaluated in the DEIR.

XIII. NOISE – Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project may produce noise during construction and operation which could exceed the applicable sound limits of the County’s General Plan Noise Element. A Project-specific noise analysis will be prepared for the Project that will evaluate noise generating sources of the Project for conformance with the County Noise Ordinance and General Plan, and compare with existing noise levels on the Project site. This topic will be discussed in the DEIR.

b) Generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Project construction may produce groundborne vibration or groundborne noise. A Project-specific noise analysis will be prepared for the Project that will evaluate noise generating sources of the Project for conformance with the County Noise Ordinance and General Plan, and in comparison, with existing noise levels on the Project site. Analysis will include the potential for groundborne vibration and groundborne noise levels during construction of the Project. This topic will be discussed in the DEIR.

c) For a project located within the vicinity of a private airstrip or 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 checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The nearest public airport to the Project site is McClellan-Palomar Airport, located roughly 8.4 miles to the west. The Project is not within the Airport Influence Area as identified in the McClellan-Palomar Airport Land Use Compatibility Plan and would not be subject to its Airport Safety Zones, Noise Contours, Avigation Easements, Overflight areas, or Federal Aviation Administration Height Notification Surface Areas.

There are two heliports located within two miles of the Project site. The Palomar Medical Center Escondido is located 0.25 miles south of the Project site and has a medical helipad to accommodate life flights. The Pat Coyle Memorial Heliport is also located approximately 1.50 miles northwest of the Project site. This private heliport is operated by the San Diego County Sheriff's Department. Given the proximity of the Project site to these locations, coordination with the Sheriff's Department and/or the FAA may be required during Project construction and operation. As a result, the anticipated impacts may be potentially significant, and this environmental issue will be further evaluated in the DEIR.

XIV. POPULATION AND HOUSING – Would the project:

a) Induce substantial unplanned 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"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Project would not include residential or commercial development that could directly contribute to population growth in the region, and it also refrains from extending infrastructure that might indirectly encourage such growth. Instead, the Project's focus lies in establishing and operating an uninhabitable energy storage facility, aimed at enhancing the electrical reliability of the San Diego area. The employment opportunities arising from the Project's construction would be of a temporary nature, and as such, there would be no lasting relocation of workers. The Project's implementation would have no impact on the population or housing within both the immediate Project vicinity and the broader County area. Consequently,

the Project is not expected to influence population growth in any way. As a result, this issue will not be discussed further in the DEIR.

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The Project site is currently occupied by equestrian-use structures. Additionally, the property includes an existing residence with accessory structures, which would be demolished; however, demolition of a single-family home as part of Project implementation would not result in the displacement of a substantial number of people necessitating housing elsewhere. Therefore, impacts would be less than significant. As a result, this issue will be further evaluated in the DEIR.

XV. 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 governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: Fire protection considerations indicate that, while various fire stations are nearby, the Project's location is within a CAL FIRE High and Moderate FHSZ. Project impacts to police protection are deemed less than significant, as the County Sheriff's Department would continue to provide law enforcement services, and the BESS construction would not increase service requirements. Regarding schools, parks, and other public facilities, the unoccupied BESS construction and operation's minimal effect on local population growth indicates no need for new or altered facilities in these categories. Therefore, overall impacts across fire protection, police protection, schools, parks, and other public facilities are evaluated as less than significant. Given the Project's location is within a CAL FIRE High and Moderate FHSZ, these environmental issues will be further evaluated in the DEIR.

XVI. RECREATION – Would the project:

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

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact. The Project does not propose a residential use that could contribute to increased utilization of existing neighborhood and regional parks or recreational facilities such that substantial physical deterioration would occur or be accelerated. However, there is potential for existing recreational activities to be relocated away from the Project site due to public concerns regarding Project safety, potentially directing recreational users to other nearby recreational opportunities. This potential scenario suggests that removing an existing equine facility could indirectly lead to the emergence of alternative recreational options. Alternatively, it could place a burden on other equine/recreational facilities. Given this potential scenario, the Project's impact on existing recreational opportunities and the possibility of increased use of recreational facilities elsewhere will be examined in the DEIR.

- b) 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"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Project does not include recreational facilities or require the construction or

expansion of recreational facilities. Therefore, no impacts are anticipated to occur from implementation of the Project. This issue will be further discussed in the DEIR.

XVII. TRANSPORTATION – Would the project:

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Transportation Guidelines) establish measures of effectiveness for the performance of the circulation system. These Transportation Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee (TIF) Program, and the Congestion Management Program (CMP).

Potentially Significant Impact: The Project includes the construction and operation of an unoccupied BESS facility. The Project would improve electrical reliability for the San Diego region by providing a source of local storage as near as possible to existing SDG&E infrastructure. Construction and operation of the Project could potentially conflict with a program, plan, ordinance or policy addressing the circulation system during construction; however, once operational, the Project would be limited to as-needed operations and maintenance (O&M) trips by O&M personnel. A Project-specific transportation analysis will be prepared for and discussed in the DEIR to determine the Project's potential impact.

b) Would the project conflict or be consistent with CEQA Guidelines section 15064.3, subdivision (b)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: Per CEQA Guidelines Section 15064.3, *Determining the Significance of Transportation Impacts*, land use projects should be evaluated based on vehicle miles traveled (VMT).

Potentially Significant Impact: The Project entails both the construction and operation of a BESS aimed at enhancing grid reliability within the San Diego region. This enhancement is achieved by implementing a localized energy storage solution positioned in proximity to the existing SDG&E transmission infrastructure. The Project's construction phase is expected to take approximately 12 to 18 months. To evaluate potential effects on VMT, a Project specific transportation analysis will be prepared for and disclosed in the DEIR.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Project would not substantially increase driving hazards due to a geometric design feature or incompatible uses. The Project includes the construction and operation of a BESS. A safe and adequate sight distance shall be required at all driveways and intersections pursuant to County standards and to the satisfaction of the Director of the Department of Public Works. The Project would not place incompatible uses on existing roadways. Therefore, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant. Nevertheless, this topic will be discussed further in the DEIR.

d) Result in inadequate emergency access?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: It is not anticipated that the Project would result in inadequate emergency access. A Fire Protection Plan (FPP) will be prepared for the Project that will describe how the Project will comply with requirements related to emergency access, water supply, and fire suppression design measures in consideration of the high concentration of electrical equipment that will be present on the Project site. Adequate emergency access would be required of the Project and the FPP will identify the necessary emergency access requirements. This topic will be discussed further in the DEIR. See also Section XX. Wildfire.

XVIII. TRIBAL CULTURAL RESOURCES – Would the project:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Consultation will be conducted with the California Native American tribes that request consultation. The DEIR will analyze whether the Project would cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the CRHR or in a local register of Historical Resources.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Consultation will be conducted with the California Native American tribes that request consultation. The DEIR will analyze whether the Project would cause a substantial adverse change in the significance of a tribal cultural resource as determined by the lead agency.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project includes the construction and operation of a battery energy storage facility. Due to the nature of the Project as a primarily unoccupied facility with minimal maintenance personnel anticipated at the site, the Project would not

require new or expanded facilities for water, wastewater treatment, natural gas, or telecommunications. However, the Project would include new stormwater drainage, and would involve the installation of new electric infrastructure and connections to the existing network to enhance electrical reliability in the San Diego region. The construction, installation, operation, and maintenance of the infrastructure has the potential to result in environmental impacts. Therefore, this issue will be discussed further in the DEIR.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Water usage would be required during Project construction which involves regular watering up to three times daily as dictated by weather conditions, to mitigate airborne dust during ground-disturbing activities, such as grubbing, clearing, grading, trenching, and soil compaction. Water demand associated with construction of the Project would primarily be sourced from Rincon Del Diablo Municipal Water District. Water demand during operations would be nominal. Water supply and demand will be further evaluated in the DEIR.

c) 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"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The Project includes the construction and operation of an unoccupied BESS. It does not propose any use types that would require wastewater treatment. Therefore, the Project would not interfere with any wastewater treatment providers service capacity, and impacts would be less than significant.

- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Construction of the Project would generate construction wastes that would be recycled to the extent possible. The waste generated by construction and demolition of existing structures would be directed to local landfill facilities. This practice would not impact the facilities' ability to meet existing demand. In addition, area landfills have sufficient capacity to accommodate the minor volume of waste expected to be generated during operation of the Project. During decommissioning of the Project, waste generated would be similar to those generated during construction and would also be recycled to the extent possible. Remaining materials that cannot be recycled or reclaimed would be limited and would be contained and disposed of offsite, consistent with the County of San Diego Construction Demolition and Debris Management Plan (County Ordinance 68.508-68.518). Though exact landfill capacities at the time of decommissioning cannot be known at this time, based on the requirement of the Integrated Waste Management Act that the County provide for sufficient solid waste capacity in its landfills for a 15-year period (to be periodically updated), it is anticipated that the local landfills would have capacity to accept the waste from decommissioning activities. Total waste sent to local landfills during construction, operation, and decommissioning is not anticipated to be substantial. Therefore, sufficient solid waste capacity exists to accommodate the Project's solid waste disposal needs and impacts would be less than significant. This topic will be discussed further in the DEIR.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Project would be required to comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste and recycling. During construction, solid waste would be appropriately sorted and

recycled, when feasible, in accordance with the California Green (CALGreen) Building Standards (i.e., a minimum 65 percent of the nonhazardous construction and demolition waste or meet a local construction and demolition waste management ordinance, whichever is more stringent). Further, construction waste would meet local standards of solid waste and recycling policies as defined in the Conservation and Open Space Element of the County's General Plan and in Chapter 5, Management of Solid Waste, of the County Administrative Code. Compliance with these regulations and statutes would result in less than significant Project impacts related to disposal of solid waste. This topic will be discussed further in the DEIR.

XX. 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 checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project site is situated within areas categorized as High and Moderate FHSZ as identified by CAL FIRE. Adherence to regulations governing emergency access, water supply, and defensible space, in accordance with the Consolidated Fire Code, would be required for the Project. It is important to highlight that the unoccupied nature of the Project effectively reduces the potential exposure of individuals or buildings to significant hazards. Nevertheless, due to the elevated density of ignition sources on-site, a Project-specific FPP will be prepared and discussed in the DEIR. This plan will assess potential risks pertaining to losses, injuries, or fatalities resulting from wildland fires during both Project construction and operation. While the Project is not projected to increase the demand for fire protection or emergency services on account of operational activities, the increased presence of ignition sources necessitates further consideration. Therefore, emergency response and evacuation will be evaluated in the DEIR.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project site is located within High and Moderate FHSZs. Additionally, the Project would increase ignition potential at the Project site. A Project-specific FPP will be prepared for and discussed in the DEIR to determine the Project's potential to exacerbate wildfire risks during Project operation and construction.

- 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 to the environment?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project would include the construction, operation, and maintenance of a BESS and associated infrastructure. This infrastructure could exacerbate fire risk that may result in temporary or ongoing impacts to the environment. A Project-specific FPP will be prepared for and discussed in the DEIR to determine the Project's potential to result in exacerbated fire risks or temporary or ongoing impacts to the environment due to installation, operation, or maintenance of Project infrastructure.

- d) Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project has the potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of drainage changes. A FPP and Drainage Study will be prepared for the Project and will be evaluated in the DEIR to determine the Project's potential to expose people or structures to significant risks from fire, including flooding or landslides.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project has the potential to impact biological resources and cultural resources. The DEIR will further analyze the Project's potential to degrade the quality of the environment, reduce the habitat of wildlife species, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project has the potential to incrementally contribute to cumulatively significant impacts. Cumulative impacts associated with the Project will be analyzed further in the DEIR.

- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Project has the potential to result in impacts to environmental issue areas that could directly or indirectly affect human beings. The Project is required to prepare a DEIR which shall identify and address environmental effects that may cause adverse direct or indirect effects on humans.

REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

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Federal Emergency Management Agency (FEMA). 2023. FEMA Flood Map Service Center –
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