



County of San Diego

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June 25, 2020
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Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183

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

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

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

General Plan

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

Zoning

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

Description of Project:

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

Project Components

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

The detailed list of major equipment is as follows:

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

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

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

Project Construction

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

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

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

Project Operations

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

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

Existing Conditions

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

Discretionary Actions:

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

Overview of 15183 Checklist

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

General Plan Update Program EIR

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

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

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

Summary of Findings

The Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Project, identified applicable mitigation measures necessary to reduce Project specific impacts, and the Project implements these mitigation measures (see [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 - Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

	June 25, 2020
Signature	Date
Jenna Roady	Land Use/Environmental Planner
Printed Name	Title

CEQA Guidelines §15183 Exemption Checklist

Overview

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

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

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

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

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

Discussion

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

KOP 1 – Eastbound Valley Center Road

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

KOP 2 – Westbound Valley Center Road

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

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

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

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

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

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

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

Conclusion

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

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

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

Discussion

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

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

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

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

Discussion

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

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

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

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

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

Project Mitigation

Tier 4 Construction Equipment and Diesel Particulate Filters

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
4. Biological Resources – Would the Project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

Discussion

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

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

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

Project Mitigation

The following is a list of Project mitigation measures:

MBTA Compliance

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

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

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

CSS Mitigation Credits or Revegetation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

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

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

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

Discussion

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

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

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

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

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

Conditions of Approval

The following list includes the Project conditions of approval:

Archaeological Monitoring Program

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

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

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

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

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

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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6. Energy Use – Would the Project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Discussion

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

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

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

Grading and Construction

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

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

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

Operational

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

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

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

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

Conclusion

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

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

7. Geology and Soils – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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

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

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

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

Conditions of Approval

The following list includes the Project conditions of approval:

Geotechnical Report

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

8. Greenhouse Gas Emissions – Would the Project:

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

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

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

Discussion

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

GHG Overview

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

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

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

Proposed Project

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

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

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

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

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

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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9. Hazards and Hazardous Materials – Would the Project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

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

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

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

Discussion

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

Transport and Storage

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

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

Project Condition of Approval

The following is the Project condition of approval:

HMBP

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

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

Accident Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

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

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

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

- 9(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.

- 9(f)(iii) OIL SPILL CONTINGENCY ELEMENT:
The Project is not located along the coastal zone.

- 9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:

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

9f)(v) DAM EVACUATION PLAN:

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

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

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

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

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

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

Conclusion

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

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

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

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

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

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

Discussion

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

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

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

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

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

Conditions of Approval

The following list includes the Project conditions of approval:

SWPPP

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

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

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

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

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

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

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

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

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

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

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

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

Project Condition of Approval

CLOMR/LOMR

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
11. Land Use and Planning – Would the Project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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12. Mineral Resources – Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Discussion

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

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

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

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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13. Noise – Would the Project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The following study has been prepared for the Project in relation to noise and incorporated into the below discussion:

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

Discussion

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

General Plan

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

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

Project Design Feature

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

Vinyl Fence or Similar Fence

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

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

Noise Ordinance

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

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

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

Project Conditions of Approval

The following list includes Project's Conditions of Approval:

Temporary Construction Noise

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

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

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

Discussion

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

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

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

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

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

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

Conclusion

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

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

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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15. Public Services – Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Discussion

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

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
16. Recreation – Would the Project:			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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

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

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

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

Conclusion

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

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

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

Discussion

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

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

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

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

Project Mitigation

Payment into the TIF Program

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

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
18. Utilities and Service Systems – Would the Project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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

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

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

Wastewater and Water Facilities

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

Electric Power Facilities

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

Natural Gas

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

Telecommunications Facilities

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

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

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

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

The following studies have been prepared for the proposed project:

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

Discussion

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

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

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

Appendices

Appendix A – References

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

Appendix A

The following is the list of Project specific technical studies used to support the Project's environmental analysis. All technical studies are available on the website here https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects.html#par_title or hard copies are available at the County of San Diego Zoning Counter, 5510 Overland Avenue, Suite 110, San Diego, 92123:

- Alberts, Kris; Blackhawk Environmental, Inc., (June 2020), Biological Resources Letter Report
- Berceli-Boyle, Tina; Haley & Aldrich, Inc, (June 2020), Draft Hazard Consequences Analysis
- Carda, Chris; Westwood Professional Services, (June 3, 2020), Preliminary Drainage Study
- Carda, Chris; Westwood Professional Services, (June 22, 2019), Priority Development Project (PDP) SWQMP
- Clayton, Heather; Chambers Group, Inc., (June 24, 2020), Conceptual Revegetation Plan
- Loudin, Jeremy; Ldn Consulting, Inc., (June 17, 2020), Air Quality Analysis
- Loudin, Jeremy; Ldn Consulting, Inc., (June 22, 2020), Greenhouse Gas Screening Letter
- Lucera, Richard; Kimley Horn, (April 21, 2020), Floodplain Analysis for Unnamed Tributary to Keys Canyon Creek
- Morel, Sid; Santa Margarita Consulting, LLC., (April 2020), Wildland Fire Protection Plan
- Pentney, Sandra; Chambers Group, (June 2020), Cultural Resources Phase I Survey and Phase II Evaluation for the Valley Center Storage Project; 29523 Valley Center Road, San Diego County, California
- Power Engineers, (April 2020), Visual Sims and Character Photographs
- Tonkovich, Greg; Vista Environmental, (May 20, 2020), Noise Impact Analysis

References

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

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

Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:
http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf