



County of San Diego

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December 5, 2019

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

1. Title: AES Fallbrook 40MW Battery Energy Storage System Project
Project Number(s): PDS2019-ZAP-19-001
Environmental Log Number: PDS2019-ER-19-02-001
2. Lead agency name and address:
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239
3.
 - a. Contact Nicholas Koutoufidis, Project Manager
 - b. Phone number: (858) 495-5329
 - c. E-mail: Nicholas.Koutoufidis@sdcounty.ca.gov.
4. Project location:
1405 E. Mission Road, Fallbrook Community Planning Area, County of San Diego
Thomas Guide Coordinates: Page 1027, Grid H/2
5. Project Applicant name and address:
Fluence Energy, 4300 Wilson Blvd., Arlington VA 22203
6. General Plan

Community Plan:	Fallbrook
Land Use Designation:	Limited Impact Industrial (I-1)
Density:	N/A
Floor Area Ratio (FAR)	0.60
7. Zoning

Use Regulation:	Limited Impact Industrial (M52)
Minimum Lot Size:	6,000 acre(s)
Special Area Regulation:	B (Community Design Review) C (Airport Land Use Compatibility Plan Area)

8. Description of project:

The proposed project consists of a Minor Use Permit (ZAP) to construct a 40-megawatt (MW) battery energy storage system (BESS) facility located at 1405 East Mission Road in the Fallbrook Community Plan area of the County of San Diego (Project). The ZAP would be placed over one parcel, 105-410-19, while two additional parcels (105-410-10, 105-410-44) would support off-site components: a 16-foot wide access driveway, infiltration basins and an underground utility easement. The Project would require the grading of 1,460 cubic yards, with 70 cubic yards of fill and 1,390 cubic yards of export.

The facility would utilize advanced technology batteries and control systems contained within an approximately 660-foot by 278-foot (179,568 sf) fenced area. The proposed BESS would consist of 16, 63-foot long, 12-foot wide, and 13-foot tall (756 sf each) battery storage containers on individual concrete equipment pads. Each container would store approximately 50 battery racks, and each rack would hold 12 battery modules. The battery storage containers would be setback 19 feet from the eastern parcel boundary and would be separated by a minimum of 8 feet from each other. In addition to the batteries, the system would contain 16 inverters/transformers (130 sf each) on individual concrete equipment pads, mechanical equipment such as electrical controls, and heating, ventilation, and air conditioning (HVAC) units. The area of new impervious surface would be 1.17 acres, an increase from an existing impervious area 0.36 acres.

The detailed list of major equipment is as follows:

- Batteries (LG Chem or Samsung SDI modules connected in racks)
- Power Conversion System (PCS - i.e., Power Electronics inverters) to convert direct current into alternative current and vice versa. Each PCS is 3 Mega Volt Amp (MVA) power capacity, with noise levels < 79 A-weighted decibels (dBA) measured at 1 meter from the back of the unit.
- HVAC systems (4 per container) to keep battery cores at optimal operating temperature
- Fire suppression systems in each container (clean agent Novec 1230 in a tank connected to nozzles and designed to flood the entire container during fire event) equipped with early smoke detection, alarms and remote monitoring
- Low and medium voltage electrical switching equipment
- Computer and telecommunications equipment
- Medium-voltage transformers
- Medium-voltage switchgear
- Step-up transformer and associated equipment
- Security lighting and fencing
- Signage

The facility would upgrade and connect to the existing SDG&E 69-kV Avocado substation (approximately 450 feet to the west) via approximately 630 linear feet of underground cable/vaults along a proposed easement to the south. Connection to the Fallbrook Public Utility District water line along East Mission Road would be established at the Project

entrance to supply water to the facility as needed. Stormwater drainage facilities would include infiltration basins located in the northern portion of the fenced facility, as well as adjacent to the access driveway. Landscaping would be designed to screen the Proposed Project facilities from East Mission Road. Access to the site would be provided via an existing paved driveway from East Mission Road which would be widened to 24-foot wide.

The Project would be delivered to San Diego Gas and Electric (SDG&E) through a Build-Own-Transfer (BOT) contract. In this case, The AES Corporation (AES) purchased the land and would then build and commission the Project. Upon successful completion of a series of Acceptance Tests in March 2021, AES would transfer the Project assets (e.g., energy storage system, land, interconnection, interconnection agreement) to SDG&E. The facility would be remotely operated and would have no permanent employees on-site. The long-term operational workforce would entail AES-contracted maintenance staff who would maintain the facilities and landscaping on a periodic basis over the Project life. The Project would require a four-person crew for maintenance visits twice a month on average.

After completion of 20 years of operations, 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.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The Project site is immediately adjacent to rural residential and agricultural land uses. The parcels adjacent to the Project site on the west are designated for Limited Impact Industrial (I-1) uses in the County's General Plan. The industrial complex to the west includes both a Calvary Chapel and the North Coast Church as well as an animal hospital and industrial uses such as welding and sign shops and a fabricator.

Surrounding lots on the north, east, and south are designated for Village Residential (VR-2) under the County's General Plan and are zoned Rural Residential (RR). However, existing development patterns include large lot residential-type land uses immediately to the north; while the development to the south, southeast, and southwest is tract housing at a slightly higher density.

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

Permit Type/Action	Agency
Landscape Plans	County of San Diego
Minor Minor Grading Permit	County of San Diego
Minor Use Permit	County of San Diego
Site Plan	County of San Diego
County Right-of-Way Permits Construction Permit Excavation Permit Encroachment Permit	County of San Diego
Improvement Plans	County of San Diego
401 Permit - Water Quality Certification	Regional Water Quality Control Board (RWQCB)
1603 – Streambed Alteration Agreement	CA Department of Fish and Wildlife (CDFW)
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB
General Industrial Storm Water Permit	RWQCB
General Construction Storm Water Permit	RWQCB
Waste Discharge Requirements Permit	RWQCB
Water District Approval	Fallbrook Water District
Sewer District Approval	Fallbrook Sewer District
Fire District Approval	North County Fire Protection District

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES

NO


Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission’s Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

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

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

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

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



Signature

December 5, 2019

Date

Nicholas Koutoufidis

Printed Name

Land Use/Environmental Planner

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

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

I. AESTHETICS. Except as provided in Public Resources Code Section 21099 -- Would the project:

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

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

Discussion/Explanation:

Less than Significant Impact: 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 also to individual visual resources.

As described in the General Plan Update Environmental Impact Report (GPU EIR; County of San Diego 2011), 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 includes the construction and operation of a battery energy storage facility on parcels designated for M52 Limited Impact Industrial uses within the Fallbrook Community Plan area. Surrounding land uses consist of Limited Impact Industrial uses on the west and rural residential and agricultural land uses on the north, east, and south. The proposed facility would consist of battery storage containers located on an interior parcel and set back from East Mission Road by approximately 550 feet. The facility would be screened by existing structures and vegetation on East Mission Road. In addition, new landscaping is proposed along the northern, eastern, and southern boundaries of the facility, based on consultation with the Fallbrook Community Planning Group and to ensure consistency with the Fallbrook Community Plan Design Guidelines/Checklist. Further, proposed containers would be constructed on individual concrete equipment pads to conform to the natural topography of the site. Therefore, the Project would be compatible with existing surrounding industrial and agricultural operations.

Moreover, although there are several RCAs in the Fallbrook CPA, all RCA's within a mile radius of the site are low-lying creek and stream resources which would not afford views of the Project site. The nearest RCA offering views from a vantage point would be Mount Olympus, approximately 5.65 miles to the east. Due to the distance and Project compatibility with surrounding development in relation to bulk and scale, the Project would not substantially change the composition of an existing scenic vista in a way that would adversely alter the visual quality or character of the view.

Due to the aforementioned criteria, the Project would have a less than significant effect on a scenic vista.

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

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

Discussion/Explanation:

Less than Significant Impact: 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 natural features of scenic value are associated with the Project site. The Project is not located near or visible within the composite viewshed of a state scenic highway or County Designated Scenic Corridor and would not damage or remove visual resources within a state scenic highway or County Designated Scenic Corridor. The Project site is located approximately 1.4 miles northeast of Mission road, 1.6 miles northwest of Green Canyon road, and 2.4 miles northwest of Gird and Reche road, all County-Designated Scenic Corridors. It should be noted that not all segments of the above County roads have been designated as a County scenic corridor. Due to distance, intervening topography and structures, the site would not be visible from any designated segment of a County Scenic Corridor. Additionally, the nearest eligible state scenic highway (I-15) is located 3.4 miles to the east and the Project site is not visible from that highway. The nearest designated state scenic highway is approximately 50 miles southeast. Therefore, the Project would not have any impact on a scenic resource within a state scenic highway.

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

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

Discussion/Explanation:

Less than Significant Impact: 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 Fallbrook Community Plan describes the community vision as maintaining its "small town atmosphere and rural, semi-rural natural environment." The existing visual character and quality of the Project site and surrounding is characterized by Limited Impact Industrial uses on the west and rural residential and agricultural land uses on the north, east, and south.

The Project is compatible with the existing natural and built environment. The proposed facility would be primarily un-manned and remotely operated. The facility would consist of battery storage containers constructed on individual concrete equipment pads to limit any impacts to existing topography to the extent possible. This would additionally break up the Project components by reducing the bulk and scale of the Project for consistency with development to the north, east and south. As previously discussed, the Project would be located on an interior parcel, set back approximately 500 feet and behind existing structures and vegetation on East Mission Road. Further, based on consultation with the Fallbrook Community Planning Group and to ensure consistency with the Fallbrook Community Plan Design Guidelines/Checklist, a compatible color scheme and new landscaping along the northern, eastern, and southern boundaries of the facility is proposed as part of Project design. Therefore, the Project would not degrade the visual character of the area and would be compatible with existing surrounding industrial and agricultural operations.

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

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

Discussion/Explanation:

Less than Significant Impact: The Proposed Project is located within Zone B as identified by the San Diego County Light Pollution Code. Zone B is an area that is more than 15 miles from an observatory. The Project outdoor lighting, if necessary, would be minimal and only required for security purposes. The Project would not adversely affect nighttime views or astronomical observations because the Project would conform to the County's Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. Compliance with the Code is

required prior to issuance of a building permit. Therefore, the Project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES -- Would the project:

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

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

Discussion/Explanation:

Background: In determining whether impacts to agricultural resources are significant environmental effects, the CEQA Guidelines references the California Agricultural LESA Model (1997) prepared by the California Department of Conservation (DOC), as an optional methodology that may be used to assess the relative value of agriculture and farmland. After several years of practical experience with application of the LESA model in San Diego County, the inadequacy of the model in capturing the unique and varied character of San Diego agriculture has become apparent. An alternative approach, referred to as the Local Agricultural Resource Assessment (LARA) model has been developed to assess the relative value of agricultural resources in the County of San Diego. Specific documentation of the LARA model can be found in the Guidelines for Determining Significance for Agricultural Resources (Guidelines) at <http://www.sdcounty.ca.gov/pds/procguid.html#Agricultural Resources>.

Less than Significant Impact: Portions of the Project site were used for residential, and previously for agricultural purposes (primarily citrus crops) beginning in 1994 or possibly earlier, the remnants of which are still visible in places (e.g., irrigation pipe, tree stumps, etc.). However, no active agricultural uses are currently taking place.

Through initial County review, the following are the Project site specific characteristics of importance regarding agricultural resources:

- Historic Agricultural Site
- Recent Agricultural Use within 10 years
- Within the County Water Authority
- Sunset Zone: 23 (High significance)
- Farmland of Statewide Local Importance
- Topography Rating (High Significance)

According to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), portions of the Project site are categorized as “Farmland of Statewide Importance”, “Farmland of Local Importance”, and “Unique Farmland.” Use of this categorized land for the Project could constitute converting protected or important farmland.

As discussed above, the County evaluates agricultural resources based on the County’s LARA model which takes into account local factors that define the importance of San Diego County agricultural resources. Pursuant to the LARA model prepared for the Project by the County of San Diego, dated July 12, 2018, the site would not constitute an important agricultural resource. The site has received a rating of “high” for climate and a rating of “moderate” for soil quality. However, the site has received a rating of “low” for water. The site is located within the County Water Authority service area, however, pursuant to the Guidelines, if no water infrastructure connections to the site exist and no meter has been installed, the site would receive a rating of “low” for water. In order for a site to be considered an important agricultural resource based on the LARA model, all three required LARA model factors (water, soil, and climate) must receive either a high or moderate score. A low score in any of these three categories would render a LARA model result that the site is not an important agricultural resource pursuant to the Guidelines. Therefore, the site would not meet the definition of a significant agricultural resource, and conversion of this Farmland of Statewide or Local Importance to a non-agricultural use would be considered less than significant.

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

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

Discussion/Explanation:

According to the Guidelines, indirect impacts would occur if a project proposes a school, church, day care or other use involving a concentration of people, or is placed within one-quarter mile of an active agricultural operation or land under a Williamson Act Contract, and as a result of the project, land use conflicts would occur.

Less than Significant Impact: The Project site is zoned M52, Limited Impact Industrial, which is not considered to be an agricultural zone. In addition, the Project site and surrounding land within a quarter mile is not under a Williamson Act Contract, a County Agricultural Preserve, or contains active agricultural operations. The closest agricultural preserve is located approximately 1.3 miles west of the Project site and the closest land under a Williamson Act contract are located approximately 2.1 miles north of the Project site. Adjacent parcels to the east and south have been used historically for a grove, but no current agricultural uses are operating within 300 feet of the Project. According to the Guidelines, for most types of agriculture, if the land uses are separated by 300 feet, interface conflicts would usually be less than significant. In addition, land with a history of agricultural use would usually be considered agricultural land, unless there is evidence that it has been committed to a non-agricultural use,

according to the Guidelines. The Project site and surrounding parcels have been re-zoned to Limited Impact Industrial (M-52) zone, thereby committing the land to a non-agricultural use. Moreover, the Project site does not propose a sensitive land-use type such as a school or daycare. Therefore, the Project would have a less than significant impact on conflicts with existing zoning for agricultural use or a Williamson Act contract.

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

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

Discussion/Explanation:

No Impact: The Project site, including offsite improvements, does not contain forest land or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the Project would be consistent with existing zoning and a rezone of the property is not proposed. Therefore, Project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones.

- d) Result in the loss of forest land or 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"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Project site, 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. A portion of the Cleveland National Forest is located approximately 8.5 miles to the northwest of the Project site, however, due to distance the Project would not impact forest land.

- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use or conversion of forest land to non-forest use?

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

Discussion/Explanation:

Less than Significant Impact: As described above in response II. Agriculture and Forestry Resources, a), the Project has been determined to not meet the definition of a significant agricultural resource pursuant to the Guidelines of Determining Significance for Agricultural Resources. In addition, the Project is not under a Williamson Act Contract or within an Agricultural Preserve, nor is the Project site located within the vicinity of a Williamson Act Contract, an Agricultural Preserve, existing agricultural operation, nor surrounded by agricultural-zoned land. Therefore, the Project would not have significant adverse impacts related to the conversion of Farmland of Statewide Importance, Farmland of Local Importance, or Unique Farmland to a non-agricultural use

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

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

Discussion/Explanation:

Less Than Significant Impact: The Project proposes development of a 40-MW battery storage facility on land designated for M52 Limited Impact Industrial use in the community of Fallbrook. Construction would include 16 battery storage containers (756 sf each) on individual concrete equipment pads with HVAC systems, access road widening, underground transmission line, and landscaping. The system would be remotely operated; long-term operational workforce would entail maintenance visits only twice a month on average.

The RAQS rely on population and projected growth in the County, mobile, area and all other source emissions in order to project 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 consistent with the General Plan category and zoning with the application of a minor use permit for the site and was accounted for in the County's General

Plan. Therefore, based on the *County's Guidelines for Determining Significance for Air Quality*, since the Project is considered consistent with the growth anticipated by the General Plan, the Project would also be consistent with the RAQS and would not conflict with or block the implementation of the RAQS or the SIP.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

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

Discussion/Explanation:

Less Than Significant Impact with Mitigation Incorporated: Currently, San Diego County is in "non-attainment" status for federal and state Ozone (O₃) and state Particulate Matter less than or equal to 10 microns and less than or equal to 2.5 microns (PM₁₀ and PM_{2.5}). O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Air quality emissions associated with the Project would include emissions of PM₁₀, NO_x and VOCs from construction/grading activities. Operational sources would include area sources such as landscaping equipment, energy usage for battery cooling, water usage for limited landscaping, vehicle usage and minimal solid waste generated from the site during maintenance activities (i.e., landscape debris). Additional operational emissions would be generated from traffic associated with bi-monthly maintenance site visits.

Pursuant to the Project Air Quality Assessment prepared by Ldn Consulting, Inc. and dated April 5, 2019, the Project was found to have potentially significant health risk impacts from diesel exhaust during construction; however, with the use of at least Tier 3 or better diesel equipment fitted with diesel particulate filters (DPF), impacts would be mitigated to less than significant. In addition, grading operations associated with the construction of the Project would be subject to the County of San Diego Grading Ordinance and the San Diego Air Pollution Control District (SDAPCD) Rule 55, which requires the implementation of dust control measures during grading activities. Further, operational emissions have been determined to be minimal and below the screening level thresholds within the San Diego County Guidelines for Determining Significance for Air Quality.

Based on analysis of proposed construction and operational activities, the Project would not result in substantial emissions such that any criteria pollutant air quality standard would be violated. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant; impacts would be less than significant with mitigation incorporated.

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Discussion/Explanation:

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

Existing residences are located within a quarter mile (the radius determined by SCAQMD in which the dilution of pollutants is typically significant) of the Project site. The Project could result significant health risk impacts from diesel exhaust during construction. However, based on the Project Air Quality Assessment, with the use of Tier 3 or better diesel equipment fitted with diesel particulate filters (DPF), impacts would be mitigated to less than significant. In addition, Project operational emissions have been determined to be minimal and below the screening level thresholds within the San Diego County Guidelines for Determining Significance for Air Quality. Therefore, the Project would not propose uses or activities that would result in exposure of identified sensitive receptors to substantial pollutant concentrations and impacts would be less than significant with mitigation incorporated.

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

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

Discussion/Explanation:

Less than Significant Impact: The Proposed Project would likely generate short-term odors from temporary construction activities such as paving and possibly painting. Odors created during short-term construction activities would most likely be from placing asphalt which has a slight odor from the bitumen and solvents used within hot asphalt. Impacts associated with asphalt operations are short-term, less than one month, and are expected to be less than significant. The Project may also create temporary construction odors from combustion engine

equipment but would not be considered significant due to the highly dispersive nature of diesel exhaust. No odor-generating land uses are proposed and, therefore, no significant operational odors emissions would not be expected to affect surrounding receptors. Therefore, impacts would be less than significant.

IV. BIOLOGICAL RESOURCES -- Would the project:

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

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

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, site photos, and a Biological Resources Letter Report dated October 17, 2019 prepared by Cummings Environmental Inc, it has been determined that the site, and surrounding area, supports native vegetation, including coast live oak woodland and southern willow scrub. Staff has determined the removal of the 0.47 acres of coast live oak habitat and their oak root protection zone will not result in substantial adverse effects with the incorporation of mitigation. The proposed mitigation consists of the purchase of 1.41 acres of coast live oak woodland mitigation credits. In addition, the Project includes dedication of an open space easement over the remainder of the coast live oak woodland and southern willow scrub with open space signage, and dedication of a limited building zone. Therefore, the impact is less than significant with the incorporation of mitigation.

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

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Based the Biological Resources Letter Report dated October 17, 2019 and prepared by Cummings Environmental Inc, it has been determined that the Project site contains southern riparian scrub and coast live oak woodland

within the Project boundaries. However, the areas proposed for development will completely avoid direct impacts to any portion of the southern riparian scrub. Mitigation measures have been incorporated regarding the coast live oak woodland as described in part (a). Therefore, Project impacts to any riparian habitat or sensitive natural community identified in the County of San Diego Multiple Species Conservation Program, County of San Diego Resource Protection Ordinance, Natural Community Conservation Plan, Fish and Wildlife Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies or regulations, are considered less than significant with the incorporation of mitigation.

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

Discussion/Explanation:

Less Than Significant Impact: Based on the Biological Resources Letter Report dated October 17, 2019 and prepared by Cummings Environmental Inc, it has been determined that wetlands, defined by Section 404 of the Clean Water Act that include disturbed wetland and southern riparian woodland habitat(s) is on the Project site. However, the Project will not impact through, discharging into, directly removing, filling, or hydrologically interrupting, any federally protected wetlands supported on the Project site. The Project proposes complete avoidance. Therefore, no significant impacts will occur to wetlands or waters of the U.S. as defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers. The Project has been conditioned to provide evidence that permits under Section 404 of the Clean Water Act are not required (or to obtain appropriate permits if determined to be required).

d) Interfere substantially with the movement of any native resident or migratory Fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

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

Discussion/Explanation:

Less than Significant Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, site photos, and a Biological Resources Letter Report dated October 17, 2019 prepared by Cummings Environmental Inc, it has been determined that the site has limited biological value and impedance of the movement of any native resident or migratory fish or wildlife species, the use

of an established native resident or migratory wildlife corridors, and the use of native wildlife nursery sites would not be expected as a result of the Project due to the Project area being surrounded by development and busy roads. Breeding season avoidance will be implemented and if an active nest is observed, avoidance measures will be implemented.

- 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?

Potentially Significant Impact Less than Significant Impact
Less Than Significant With Mitigation No Impact
Incorporated

Discussion/Explanation:

Less Than Significant Impact: Refer to the attached Ordinance Compliance Checklist dated December 5, 2019 for further information on consistency with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan, including, Habitat Management Plans (HMP), Special Area Management Plans (SAMP), or any other local policies or ordinances that protect biological resources including the Multiple Species Conservation Program (MSCP), Biological Mitigation Ordinance, Resource Protection Ordinance (RPO), Habitat Loss Permit (HLP).

V. CULTURAL RESOURCES -- Would the project:

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

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation No Impact
Incorporated

Discussion/Explanation:

Less than Significant Impact: Based on an analysis of records and a survey of the property by a County of San Diego approved historian, Doug Mengers, it has been determined that there are one or more historical resources within the Project site. These resources include a 1956 ranch style residence. An historical resources report titled, *Cultural Resources Survey Report for the AES Fallbrook Project* (October 2018), prepared by Shelby Castells and Doug Mengers evaluated the significance of the historical resources based on a review of historical records including site record forms, historic maps, historic addresses and an architectural evaluation. Based on the results of this study, it has been determined that the historic resource is not significant pursuant to the State of California Environmental Quality Act (CEQA) Guidelines, Section 15064.5. Because the resources are not considered significant historic resources

pursuant to CEQA Section 15064.5, the loss of these resources cannot contribute to a potentially significant cumulative impact.

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

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

Discussion/Explanation:

Less than Significant Impact:

Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologist, Shelby Castells, it has been determined that the Project site does not contain any archaeological resources. The results of the survey are provided in an archaeological survey report titled, *Cultural Resources Survey Report for the AES Fallbrook Project* (October 2018), prepared by Shelby Castells and Doug Mengers. An Archaeological Monitoring Program will be made a condition of approval for the potential discovery of buried resources as outlined below.

- Pre-Construction
 - Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction.
 - Pre-construction meeting to be attended by the Project Archaeologist and Luiseno Native American monitor to explain the monitoring requirements.
- Construction
 - Monitoring. Both the Project Archaeologist and Luiseno Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Luiseno Native American monitor. Both the Project Archaeologist and Luiseno Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources
 - If cultural resources are identified:
 - Both the Project Archaeologist and Luiseno Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project Archaeologist shall contact the County Archaeologist at the time of discovery.
 - The Project Archaeologist in consultation with the County Archaeologist and Luiseno Native American shall determine the significance of discovered resources.

- Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
- Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Luiseno Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
- If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Luiseno Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
- Human Remains.
 - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Luiseno Native American monitor.
 - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- Rough Grading
 - Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
- Final Grading
 - Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, the Pechanga Band of Luiseno Indians, the Rincon Band of Luiseno Indians, the San Luis Rey Band of Mission Indians, and any culturally-affiliated tribe who requests a copy.

- o Cultural Material Conveyance
 - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.
 - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

- c) Disturb any human remains, including those interred outside of dedicated cemeteries?
 - Potentially Significant Impact
 - Less Than Significant With Mitigation Incorporated
 - Less than Significant Impact
 - No Impact

Discussion/Explanation:

No Impact: Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologist, Shelby Castells, it has been determined that the Project will not disturb any human remains because the Project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The results of the survey are provided in an archaeological survey report titled, *Cultural Resources Survey Report for the AES Fallbrook Project* (October 2018), prepared by Shelby Castells and Doug Mengers.

VI. ENERGY -- Would the project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
 - Potentially Significant Impact
 - Less Than Significant With Mitigation Incorporated
 - Less than Significant Impact
 - No Impact

Discussion/Explanation:

Less than Significant Impact: The Project is intended to provide local area capacity for electrical system reliability and flexibility. During construction, the Project would require the use of heavy construction equipment that would be fueled by gas and diesel but would be temporary. The Project does not include any permanent components that would increase demand for existing sources of energy for the exception of gasoline usage for bi-monthly maintenance visits and landscaping equipment. 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.

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

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

Discussion/Explanation:

No Impact: The Project would be part of a sustainable solution to enable increasing amounts of intermittent renewable energy generating sources to be accessed; therefore, no conflicts with renewable energy or energy efficiency plans would occur and there would be no impact from the Project.

VII. GEOLOGY AND SOILS -- Would the project:

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

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

A Geotechnical Investigation (Investigation) has been prepared by AECOM, dated February 27, 2017. The following responses has incorporated the analysis from the Investigation.

Discussion/Explanation:

Less than Significant Impact: The Project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 2007, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. According to the Investigation, the nearest active fault to the site is the Elsinore fault zone located approximately 8 miles east. This fault is not considered to present a significant fault rupture hazard in the Project area. Therefore, the potential for surface fault rupture at the Project site is considered to be very low, and impacts would be less than significant.

ii. Strong seismic ground shaking?

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

Discussion/Explanation:

Less than Significant Impact: To ensure the structural integrity of all structures, the Proposed Project must conform to the Seismic Requirements as outlined within the California Building Code. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Additionally, the proposed battery storage containers would be individually placed on level ground. Each battery storage container would be fastened to earth screws at all four corners of the container. Within the containers, battery racks would be attached to the floor of the storage container using methods and materials approved by a structural engineer to withstand damage from seismic ground shaking consistent with the California Building Code. No permanent occupancy is proposed at the Project site, and people would generally not be present except during construction or during scheduled or required maintenance or repairs of the facility operations. Therefore, compliance with the California Building Code and the County Code ensures the Project will not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

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

Discussion/Explanation:

Less than Significant Impact: The Project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, according to the Investigation, the Project site is predominately underlain by variably weathered dense and very dense granitic rock, and groundwater is expected to occur at depth within the fractured granitic rock. Therefore, there will be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. In addition, because liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

iv. Landslides?

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

Discussion/Explanation:

Less than Significant Impact: The Project site is not within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone.

According to the Investigation, the Project site is relatively flat. No existing slopes are located within the Project area. Site grading creating new slopes or requiring retaining walls is not expected for the Project. Because the Project is not located within an identified Landslide Susceptibility Area and the geologic environment has a low probability to become unstable, the Project would have a less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

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

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

Discussion/Explanation:

Less than Significant Impact: The majority of soils on the Project site are identified as Placentia sandy loam, 2 to 9 percent slopes (PeC), which has a soil erodibility rating of "slight to moderate" and a "slow to medium" runoff class, as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. In addition, the Project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The Project would not result in unprotected erodible soils; is not located in a floodplain; and would not develop steep slopes.
- A Storm Water Quality Management Plan (SWQMP) and Drainage Study (November 2019) have been prepared by Haley and Aldrich, Inc. for the Project. Proposed new

stormwater drainage facilities would include infiltration basins to capture runoff and protect downstream resources.

- The Project involves grading. However, the Project would be required to comply with the County's Grading Ordinance [San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING)]. Compliance with these regulations would minimize the potential for water and wind erosion.

Due to these factors, it has been found that the Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project involves 1,460 cubic yards of grading that would result in the creation of areas of cut and areas underlain by fill. In order to assure that Proposed Project components are adequately supported, a Geotechnical Investigation was prepared for the Project, in compliance with the San Diego County Building Permit process. The investigation found that excessive swelling or shrinkage of surficial soil/rock due to wetting and drying over time is not anticipated. In addition, since native soils are primarily derived from weathering of dense to very dense native granitic rock, the potential for collapse at the Project site is considered low. The investigation also found that the potential for excessive settlement affecting the Project is low, and the potential for subsidence is very low. The investigation evaluated the strength of underlying soils and provided recommendations on foundation design. The investigation demonstrated that the site would be suitable for development when constructed in accordance with structural stability standards required by the California Building Code, and in compliance with the Grading Ordinance. Therefore, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to Section VI Geology and Soils, Question a), iii) through iv) listed above.

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

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

Discussion/Explanation:

Less than Significant Impact: The main soil unit on the Project site is PeC Placentia sandy loam, 2 to 9 percent slopes pursuant to the County of San Diego Soil Survey. This soil has a high shrink-swell potential, which is associated with expansive soils. However, the Geotechnical Investigation performed for the Project found that the site residual soil as well as the granitic rock weathering is predominately silty to clayey sand with a relatively low plasticity. It determined that that excessive swelling or shrinkage of the surficial soil/rock due to wetting and drying over time is not anticipated, and that the potential for expansive soil to impact performance of the Proposed Project is considered low. The Proposed Project would be designed and constructed in compliance with the California Building Code design standards and incorporate geotechnical recommendations to ensure soil stability and proper engineering design of the battery storage footings, thus reducing potential impacts related to geologic units or soils to a less than significant level. Therefore, the Project would not create a substantial risk to life or property and impacts would be less than significant.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

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

Discussion/Explanation:

No Impact: The Project does not propose any septic tanks or alternative wastewater disposal systems because no wastewater would be generated. Therefore, the Project would have no impact related to the use of septic tanks or alternative wastewater disposal systems.

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

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

Discussion/Explanation:

San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

No Impact: A review of the County's Paleontological Resources Maps indicates that the Project is located entirely on plutonic igneous rock and has no potential for producing fossil remains.

The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

VIII. GREENHOUSE GAS EMISSIONS -- Would the project

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

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

Discussion/Explanation:

Less than Significant Impact: The Project would produce Greenhouse Gas (GHG) emissions during construction activities, as well as during the operation of the Project through vehicle trips and landscaping maintenance. However, the Project falls below the screening criteria that were developed to identify project types and sizes that would have less than cumulatively considerable GHG emissions.

GHG Overview

Greenhouse gas (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.

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

Senate Bill (SB) 375, passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (CARB) to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under the California Environmental Quality Act (CEQA). The San Diego Association of Governments (SANDAG) has prepared a Sustainable Communities Strategy (SCS) and the 2050 Regional Transportation Plan (RTP) which are elements of the San Diego Forward: The Regional Plan. The strategy identifies how regional GHG reduction targets, as established by the CARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible. The County of San Diego has also adopted various GHG related goals and policies in the General Plan.

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 environmental impact report (EIR) shall analyze GHG emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

Background on CAP and Litigation

The County of San Diego adopted a Climate Action Plan on February 14, 2018 which outlines actions that the County will undertake to meet its greenhouse gas (GHG) emissions reductions targets. Implementation of the CAP requires that new development projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. In addition, a CAP Consistency Review Checklist has been prepared by the County to help streamline the review and determine consistency with the CAP. However, in March 2018, several petitioners filed a lawsuit against the County, alleging that the CAP and, in particular, M-GHG-1 were inconsistent with General Plan Goal COS-20 and Policy COS-20.1.

In December 2018, the San Diego Superior Court ruled against the County. The Court issued a writ ordering the approval of the CAP and its EIR to be set aside, and enjoining reliance on the County CAP's mitigation measure M-GHG-1. In January 2019, the County appealed the San Diego Superior Court ruling which stayed the above described writ. Essentially, the CAP and its EIR are still in place during the appeal. Given the current legal instability concerning the County's CAP, the analysis prepared for the Project did not rely solely on the CAP to streamline the Project's environmental analysis under CEQA Guidelines Section 15183.5. Rather, the Project's significance determination used the criteria detailed above, (informed by CEQA Guidelines Section 15064.4) and mitigation strategies (informed by CEQA Guidelines Section 15126.4(c)) that are independent of the CAP. As such, in the event that the CAP does not withstand judicial scrutiny, the Project has undergone a separate, stand-alone analysis for determining whether the Project's GHG emissions would significantly impact the environment. The results from both the CAP checklist and the supplemental GHG analysis are described below.

Project Analysis

The Project has prepared the CAP checklist and would implement all applicable measures identified in the checklist. The Project would therefore be consistent with the County's Climate Action Plan. Proposed incorporated measures from the CAP Checklist include the following:

In order to supplement the CAP checklist, a Greenhouse Gas Screening analysis was prepared by Ldn Consulting, Inc. and dated April 5, 2019. The analysis found that demolition and construction of the Project would generate approximately 95 MTCO_{2e} over the construction life of the Project. Given the fact that the total emissions would ultimately contribute to cumulative levels, total construction emissions averaged over the life of the Project, assumed to be 30 years, would add 5 MTCO_{2e} per year. Adding both annual construction and the expected operational emissions from vehicle exhaust emissions associated with the maintenance crews traveling to and from the site, the Project would generate emissions of 8.19 MTCO_{2e} per year. For reference, the California Air Pollution Control Officers Association (CAPCOA) prepared a white paper which recommends a 900 metric tons (MT) of carbon dioxide equivalent (CO_{2e}) per year per screening level to determine the size of projects that would be likely to have a less than considerable contribution to the cumulative impact of climate change. Given this, the Project would not exceed CAPCOA's 900 MTCO_{2e} screening level and would not be expected to result in a substantial contribution of GHG emissions to global climate change.

The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, impacts are less than significant.

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

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

Discussion/Explanation:

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

SB 375, passed in 2008, links transportation and land use planning with global warming. It requires CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. SANDAG has prepared a SCS and the 2050 RTP which are elements of the San Diego Forward: The Regional Plan. The strategy identifies how

regional GHG reduction targets, as established by CARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

To implement state mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local General Plans to ensure development is guided by a land use plan that reduces GHG emissions. The County of San Diego's General Plan incorporates policies related to climate change. These policies provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets.

As discussed in Section VIII(a) above, the Proposed Project's emissions would be below the 900 MTCO_{2e} per year screening level. As such, the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. Impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

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

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

Discussion/Explanation:

A Hazard Consequence Analysis Report dated November 2019 was prepared by the consulting firm Haley and Aldrich by Robert Kalin, Senior Technical Specialist and Tina Berceli-Boyle, P.E., Senior Associate/Chemical Engineer. The study was peer reviewed by Eric Clark of Stantec. San Diego Gas & Electric was also provided the study for review and has no further comments.

Less than Significant Impact: The Project will be conditioned to comply with Department of Environmental Health requirements for the transport and storage of hazardous chemicals. Therefore, the Project will not have any effects to hazards and hazardous materials with the preparation and approval of a Hazard Materials Business Plan prior to building permit issuance.

The HMBP contains detailed information on the storage of hazardous materials at regulated facilities. 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. The HMBP

also provides emergency response personnel with adequate 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 preventive measures designed to minimize the risk of a spill or release of hazardous materials.

The HMBP is not a mitigation measure and is considered part of the standard conditions of approval for a Project.

The EPA's "Risk Management Program Guidance for Offsite Consequence Analysis" and the CalARP both recommend conducting an offsite consequence analysis to represent release scenarios that are possible (although unlikely) to occur 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 were used for conducting the off-site consequence analysis are specified in the California Code of Regulations (CCR), Title 19, Chapter 4.5, Article 2735.1 et seq.

Plume analysis and exposure impacts were conducted using USEPA's ALOHA hazards modeling program. Based on information about a chemical release, ALOHA estimates how quickly the chemical will escape from containment and form a hazardous gas cloud, and also how that release rate may change over time. ALOHA can then model how that hazardous gas cloud will travel downwind, including both neutrally buoyant and heavy gas dispersion. Additionally, 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); toxicity, flammability, thermal radiation, and overpressure. ALOHA produces a threat zone estimate, which shows the area where a particular hazard (such as toxicity or thermal radiation) is predicted to exceed a specified level of concern at some time after the release begins. ALOHA is able to determine a threat zone under different weather and wind scenarios.

Based the Offsite Consequence Analysis dated October 2019 and prepared by Haley & Aldrich, a toxic release from 1.5 battery racks was assumed to be triggered by a fire event and result in a release of HCl, HF, HCN, and CO. Using nighttime meteorological conditions, modeling results indicate that the distance of the Project to sensitive use types will be adequately sited. ALOHA is unable to predict threat zones less than 10 meters because of the effects of near-field patchiness which make dispersion predictions less reliable for short distances.

The Project is required to conform to California Fire Code 2018 section 608.5.1.1. which requires stationary storage battery systems to have a fire suppression system. Each container will have four heating, ventilation, and air conditioning systems to keep battery cores at optimal operating temperature. Fire suppression systems in each container include the clean agent Novec 1230

in a tank connected to nozzles and designed to floor the entire container during a fire vent. The systems will be reequipped with early smoke detection, alarms, and remote monitoring. The use of Novec 1230 with an active suppression system supports the determination adequate separations, cascading protections, and suppression systems would limit failure to a single module or at least a single rack and that the credible thermal runaway/fire event involving a maximum 1.5 battery racks is a conservative assumption.

The results of the offsite consequence analysis show that the Project would be adequately sited relative to sensitive use types. The estimated maximum distance is primarily within the Project site's boundary but does extend to the adjacent undeveloped parcel (APN 1054101100), which is also controlled by Fluence. No schools or residences are located within the maximum distance of the Project site.

Therefore, impacts would be less than significant and no mitigation would be required.

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

Discussion/Explanation:

Less than Significant Impact:

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 vent 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.

The County of San Diego's Planning and Development Services identified the St. Stephen Lutheran Church located on parcel APN 1050922200 is proposing to modify their Major Use Permit to be a small school. This property is located approximately 0.25 mile from the Project site's boundary. In addition, Lavender Hill School is a small home school located approximately 700 feet east of the Project site on parcel APN 1054210100.

As previously identified in response IX. Hazards and Hazardous Materials, a), the Project would be adequately sited relative to sensitive use types. The estimated maximum distance is primarily within the Project site's boundary but does extend to the adjacent undeveloped parcel (APN

1054101100), which is also controlled by Fluence. No schools or residences are located within this distance.

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

Discussion/Explanation:

No Impact: Based on a Phase I Environmental Site Assessment completed for the Project, in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process as referenced in 40 Code of Federal Regulations (CFR) Part 312 (the All Appropriate Inquiries [AAI] Rule), the Project site has not been subject known or suspected “recognized environmental conditions” (REC) as defined in the ASTM E 1527-13 Standard. Therefore, the Project would not create a significant hazard to the public or environment.

- 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 or excessive noise for people residing or working in the project area?

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

Discussion/Explanation:

Less than Significant Impact: The Project is not located within 2 miles of a public airport; however, it is located within the Fallbrook Community Airpark Land Use Compatibility Plan area (Review Area 2). Although the Project would be unmanned (with the exception of limited maintenance activities), and would not include construction of any structure equal to or greater than 150 feet in height that would constitute a safety hazard to aircraft and/or operations from an airport or heliport, a Federal Aviation Administration (FAA) Form 74-60-1 Notice of Proposed Construction or Alteration would be filed in compliance with FAA Height Notification coordination requirements. Therefore, the Proposed Project would not constitute a safety hazard for people residing or working in the Project area, and impacts would be less than significant.

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

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

Discussion/Explanation:

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

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

Less than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The 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 of San Diego, 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.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan would not be interfered with by the Project due to the location of the Project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element would not be interfered with because the Project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan would not be interfered with because the Project does not include the alteration of a major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

No Impact: The Dam Evacuation Plan would not be interfered with because the Project is not located within a dam inundation zone.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project is not listed as high fire hazard area but is located within the Urban-Wildland Interface Zone. A Fire Protection Plan (FPP) prepared by Santa Margarita Consulting LLC, dated October 24, 2019 has been prepared for the Project, in coordination with North County Fire Protection District. 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. Implementation of these fire safety standards would occur during the Minor Use Permit, or building permit process. In addition, a Fire Service Availability Letter and conditions, dated December 13, 2018, has been received from the North County Fire Protection District. The conditions from the North County Fire Protection District as outlined in the FPP include: location of fire hydrants along fire access driveways and roadways to meet operational needs, and at intersections (i.e., access road/East Mission Road and access road terminus/ Project driveway) and intervals pursuant to the Fire Code; 2,500 gallons per minute fire flow in water main; adequate access road a minimum of 24 feet wide, paved surface suitable for a 75,000 pound fire apparatus; driveway grade of no more than 4 percent slope; turn-around provisions at dead-end fire access roads in excess of 150 feet; driveway terminating in a 40-foot radius cul-de-sac; minimum vertical clearance of 13 feet 6 inches for the entire width of fire access road; North County Fire Protection District-approved Knox box key opener on 24-foot gate across access road; automatic fire sprinklers and fire suppression systems with early smoke detection, alarms, and remote monitoring; minimum 100-foot fuel management zone around structures over 250 square feet in size maintained annually or as needed; and fire resistant construction. The Fire Service Availability Letter indicates the expected emergency travel time to the Project site to be 2 minutes. The Maximum Travel Time allowed pursuant to the Safety Element is 5 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. Based on review of the Project by County staff, through

compliance with the County Fire Code and Consolidated Fire Code, and through compliance with the North County Fire Protection District's conditions, impacts would be less than significant.

- g) 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?

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

Discussion/Explanation:

Less than Significant Impact: The Project includes proposed infiltration basins to improve stormwater runoff and enhance natural hydrologic flow and drainage. Infiltration basins have the potential to be suitable habitat for mosquito breeding when conditions allow water to stand for a period of 72 hours (3 days) or more. A Vector Control Plan would be required if proposed basins would not drain in less than 96 hours. However, drawdown calculations from the Project drainage study and SWQMP show that the two proposed large basins would drawdown in approximately 57 and 39 hours. Therefore, water is not anticipated to stand for a period of 72 hours or more, and the proposed basins would not be considered suitable habitat for mosquito breeding. Further, the Project would be well below the 96-hour trigger requiring a Vector Control Plan. Therefore, human exposure to vectors would not substantially increase, and impacts would be less than significant.

The Proposed Project would 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. Therefore, the Project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

X. HYDROLOGY AND WATER QUALITY -- Would the project:

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

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

Discussion/Explanation:

Less than Significant Impact: The Project would be required to obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. Minimum required construction Best Management Practices (BMPs) would include vegetation stabilization planting,

fiber rolls (straw wattles), stabilized construction entrance, materials management, and waste management.

In addition, a Drainage/Hydro-modification Study and Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP), both dated November 2019, have been prepared to demonstrate that the Project would comply with all operational requirements. The Project proposes and would be required to implement the following site design measures and/or source control BMPs and/or permanent post-construction pollutant and hydro-modification control BMPs to reduce potential pollutants to the maximum extent practicable from entering storm water runoff: 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, and measures to control materials management and waste management. Proposed basins have been designed to detain excess runoff generated by the Project such that peak runoff flows offsite are maintained at or below their pre-development values. Further, most of the proposed battery storage system components would be enclosed (lithium-ion batteries would be fully contained within the storage containers, and battery fluids or substances would not be susceptible to spills or release as runoff).

The Project would be consistent with PDP requirements of the County of San Diego BMP Design Manual, which is a design manual for compliance with local County of San Diego Watershed Protection Ordinance (Sections 67.801 et seq.) and regional Municipal Separate Storm Sewer System (MS4) Permit (RWQCB, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100) requirements for storm water management.

Therefore, the Project would have less than significant impacts on water quality standards and discharge requirements, as well as degradation of surface and groundwater quality in general.

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

Discussion/Explanation:

Less than Significant Impact: The Project site is located within the Ysidora Hydrologic Area of the Santa Margarita River Hydrologic Unit in the San Diego Region. The Santa Margarita River is a 303(d) Impaired Water Body from Phosphorous, total nitrogen as N, Enterococcus, and fecal coliform.

The PDP SWQMP prepared for the Project proposes the following design measures and source control BMPs such that potential pollutants would be reduced to the maximum extent practicable so as not to increase the level of pollutants in receiving waters and reduce impacts on storm water quality and hydromodification to less than significant levels: vegetation stabilization planting, fiber rolls (straw wattles), stabilized construction entrance, materials and waste management, permeable surfaces, and biofiltration basins.

The proposed BMPs are consistent with regional surface water and storm water planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the Project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d). Regional surface water and storm water permitting regulation for County of San Diego includes the following: RWQCB, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100, San Diego Watershed Protection Ordinance (Sections 67.801 et seq.), and the County of San Diego BMP Design Manual. The stated purposes of these ordinances are to protect the health, safety and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of storm water as a resource; and to ensure the County is compliant with applicable state and federal laws. The Watershed Protection Ordinance has discharge prohibitions, and requirements that vary depending on type of land use activity and location in the County. The Project would be subject to the Watershed Protection Ordinance which would require the preparation of a Stormwater Management Plan that details the Project's pollutant discharge contribution to a given watershed and proposes BMPs or design measures to mitigate any impacts that may occur in the watershed. Therefore, impacts would be less than significant.

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

Discussion/Explanation:

Less than Significant Impact: The RWQCB has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each hydrologic unit. The Project lies in the Ysidora Hydrologic Area of the Santa Margarita River Hydrologic Unit that has the following existing and potential beneficial uses for ground water: municipal and domestic supply; agricultural supply; industrial process supply, and industrial service supply.

Potential sources of polluted runoff resulting from the Project are discussed in the PDP SWQMP prepared for the Project. The following site design measures and/or source control BMPs and/or permanent post construction pollutant and hydro-modification control BMPs would be employed

to reduce potential pollutants in runoff to the maximum extent practicable, such that the Project would not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses: permeable surfaces and biofiltration basins.

In addition, the proposed BMPs are consistent with regional surface water, storm water and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the Project would not contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Refer to Section X, Hydrology and Water Quality, Question b), for more information on regional surface water and storm water planning and permitting process.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project would obtain its water supply from the Fallbrook Public Utility District. The Project would not require restroom facilities or associated use of potable water, and would only require minimal water use for landscaping and fire suppression. Limited water required during the construction phase would be trucked in as necessary. No groundwater would be used for any purposes during construction or operation phases of the Project.

The majority of the Project would consist of gravel infill and remain pervious to allow infiltration of precipitation. New impervious surfaces would be limited to the individual concrete equipment pads and the widened areas of the access driveway. Any runoff would be directed to proposed infiltration basins located at the northern end of the facility and along the access driveway. In the context of the whole groundwater basin, the incremental amount of impervious surface that would be introduced by the Project would be small and would not substantially interfere with groundwater recharge. The Project would not involve regional diversion of water to another groundwater basin, or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. ¼ mile). Therefore, impacts would be less than significant.

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

(i) result in substantial erosion or siltration on- or offsite;

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

Discussion/Explanation:

Less than Significant Impact: As outlined in the PDP SWQMP prepared for the Project, the Project would implement the following site design measures, source control, and/or permanent post construction pollutant and hydro-modification control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff: permeable surfaces and biofiltration basins. Runoff would be directed to the proposed infiltration basins located at the northern end of the facility and along the access driveway. These measures would control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego MS4 Permit (SDRWQCB Order No. R9-2013-0001), as implemented by the San Diego County Jurisdictional Runoff Management Program (JRMP) and BMP Design Manual. The PDP SWQMP specifies and describes the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation. The Department of Public Works would ensure that the Plan is implemented as proposed. Due to these factors, the Project would not result in significantly increased erosion or sedimentation potential and impacts would be less than significant. For further information on soil erosion, refer to Section VII, Geology and Soils, Question b).

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

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

Discussion/Explanation:

Less than Significant Impact: The Drainage Study analyzes drainage before and after proposed development of the Project site, including BMPs required to control runoff rate and quality to ensure that no adverse effects would occur to downgradient neighboring properties, consistent with the County's Hydrology Manual, Hydraulic Design Manual, and BMP Design Manual. Based on the study, the proposed infiltration basins would:

- detain excess runoff generated by the Project, such that peak runoff flows off-site are maintained at or below their pre-development values; and
- retain and treat the 85th percentile storm runoff volume.

The proposed basins would control flows at the points where existing runoff leaves the property.

Furthermore, since the Project site is not currently prone to flooding and future site grading would not substantially alter the drainage patterns, the Project site would not be prone to on-site flooding under design peak flow conditions. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

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

Discussion/Explanation:

Less than Significant Impact: As discussed above in Section X, Hydrology and Water Quality, Question e)ii), the proposed infiltration basins would detain excess runoff generated by the Project such that peak runoff flows off-site are maintained at or below their pre-development values, and would retain and treat the 85th percentile storm runoff volume. Therefore, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

(iv) impede or redirect flood flows?

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

Discussion/Explanation:

Less than Significant Impact: As discussed above in Section X, Hydrology and Water Quality, Question e)ii), runoff would be directed to proposed infiltration basins which would maintain flow at or below pre-development values. Flows would be controlled at the points where existing runoff leaves the property. Therefore, the Project would not impede or redirect flows. Impacts would be less than significant.

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

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

Discussion/Explanation:

No Impact: The Project site is not located within Federal Emergency Management Agency (FEMA), County Floodplain, County Floodway, or Dam Inundation flood zones. In addition, the Project site is not located within a tsunami or seiche inundation zone. Therefore, no impacts would occur.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project site would be in compliance with the San Diego Basin Water Quality Control Plan and is not located within a County Sustainable Groundwater Management Act or Groundwater Sustainability Plan basin area. See responses to Section X, Hydrology and Water Quality, Questions a) through d). Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

XI. LAND USE AND PLANNING -- Would the project:

- a) Physically divide an established community?

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

Discussion/Explanation:

Less than Significant Impact: The Project does not propose the introduction of new major infrastructure such as roadways, water supply systems or utilities to the area. The Project was accounted for in the County's General Plan and is consistent with the M52 Limited Impact Industrial General Plan category and zoning for the site. Surrounding land uses consist of similar Limited Impact Industrial uses adjacent on the west, including the SDG&E Avocado substation. Therefore, the Project is considered consistent with surrounding land uses and would not significantly disrupt or physically divide an established community. Impacts would be less than significant.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project was accounted for in the County's General Plan and is consistent with the M52 Limited Impact Industrial General Plan category and zoning for the site. The Project is consistent with Policy LU-6.1, Environmental Sustainability and Policy COS-14.7, Alternative Energy Sources for Development Projects, because it is a clean, reliable resource that would help integrate renewables and reduce dependence on gas-fired generation, eliminate ocean water for cooling, reduce fresh water consumption, and reduce GHG and criteria air pollutant emissions. The Project is consistent with Policy LU-6.5, Sustainable Stormwater Management, because it consists mainly of gravel infill and includes several stormwater infiltration basins. The Project is consistent with Policy LU-10.2, Development–Environmental Resource Relationship, because the facility would be setback, screened by landscaping, and conform to the natural topography of the site. The Project is consistent with Policy COS-4.1, Water Conservation, because the facility would be unmanned and would require minimal water use (no groundwater). The Project is consistent with Policy COS-2.2, Habitat Protection through Site Design, because it has been sited to avoid sensitive habitat. In addition, the Project is also subject to the policies of the Fallbrook Community Plan and Design Guidelines which supports development that can be compared to, or transition with, existing development and “fits” with the community. The Project would not contrast with the surrounding use types due to the following reasons: the mass and scale of the Project would not conflict with the residences to the east due to the design as separate battery units (rather than one large unit); land use conflicts such as dust, noise and traffic would not be expected with the Project; and a landscape plan has been approved, providing for landscape screening of the site. The Project is consistent with Policy 2.3 of the Fallbrook Community Plan for industrial use because the facility would not create noise, dirt, air pollution and traffic and would include landscaping in the design of the facility to soften structure. Moreover, the Fallbrook Community Planning Group unanimously supported the Project at the February 18, 2019 hearing. 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.

XII. MINERAL RESOURCES -- Would the project:

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

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

Discussion/Explanation:

Less than Significant Impact: The Project site has been classified by the California Department of Conservation – Division of Mines and Geology as an area of “Potential Mineral Resource Significance” (MRZ-3), but with no alluvium and no active mines. The Project site is surrounded by developed land uses including residential and industrial land uses which are incompatible to future extraction of mineral resources on the Project site. A future mining operation at the Project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

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

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

Discussion/Explanation:

No Impact: The Project site is not located in an area that has Mineral Resource Zone 2 (MRZ-2) designated lands, nor is it located within 1,300 feet of such lands. Therefore, the Project would not result in the loss of availability of locally important mineral resource(s). Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan would occur as a result of this Project.

XIII. NOISE -- Would the project result in:

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

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

Discussion/Explanation:

Less than Significant Impact: The Project would include construction and remote operation of a battery energy storage facility, including 16 battery storage containers (756 sf each) with inverters and HVAC systems. A Noise Assessment (Assessment) was prepared for the Project by Ldn Consulting, Inc. in February 2019. According to the Assessment, the Project is consistent with the County of San Diego General Plan, Noise Ordinance, and other applicable noise standards for the following reasons:

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Moreover, if the Project is in excess of 60 dBA Community Noise Equivalent Level (CNEL) or 65 dBA CNEL, modifications must be made to the Project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities as mentioned within Tables N-1 and N-2. The Project is not a noise sensitive land use. However, noise sensitive land uses exist to the north, east and west of the Project site. Based on the Analysis, Project implementation would not expose existing or planned noise sensitive areas to noise in excess of the outside sound level threshold. The Project was found to be below the most restrictive nighttime property line standard of 57.5 dBA at the adjacent properties zoned Residential. In addition, the Project is consistent with the County Guidelines for Determining Significance and would not be expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels. Therefore, the Project is consistent with the General Plan – Noise Element and impacts would be less than significant.

Noise Ordinance – Section 36.404

Non-transportation noise for the Project would be sourced from the HVAC system and periodic maintenance of the Bess Facility. Based on the Analysis including the empirical data, manufactures specifications and distances to property lines, non-transportation noise generated by the Project would not exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the Project's property line. The HVAC system and periodic site maintenance of the BESS facility would not result in a substantial increase in noise levels above existing landscape maintenance on the existing and surrounding properties nor would it exceed

County noise standards. In addition, on-site operations would be limited to the daytime hours of 7 a.m. to 10 p.m. Therefore, the Project is consistent with the Noise Ordinance Section 36.404 and impacts would be less than significant.

Noise Ordinance – Section 36.409 and Section 36.410

Based on the Assessment, the Project would not generate construction noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36.409). The assessment found that at a distance as close as 240 feet, the point source noise attenuation from grading activities and the nearest property line would be -13.6 dBA, which equates to a worst-case 8-hour average combined noise level of 66 dBA at the property line during grading. During construction of the offsite transmission line, noise levels of 69 dBA L_{eq} would be anticipated at the edge of the easement. Given these noise levels and the spatial separation of the equipment over the site, the noise levels of the grading transmission line construction are anticipated to comply with the County of San Diego's 75 dBA standard at all Project property lines. Noise associated with construction would occur between 7:00 a.m. and 7:00 p.m. Thus, daytime construction would not result in significant noise impacts. In addition, no impulsive noise sources, such as blasting or rock crushing, is anticipated during grading operations. Therefore, the Project is consistent with the Noise Ordinance Section 36.409 and 36.410; impacts would be less than significant.

Finally, the Project's conformance to the County of San Diego General Plan and County of San Diego Noise Ordinance (Section 36-404 and 36.410) ensures the Project will not create cumulatively considerable noise impacts, because the Project will not exceed the local noise standards for noise sensitive areas; and the Project will not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Therefore, the Project will not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

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

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

Discussion/Explanation:

Less than Significant Impact: As discussed in response XIII(a) above, no blasting or rock crushing is anticipated during grading operations. Therefore, no impulsive noise sources are expected, and the Project would comply with Section 36.410 of the County Noise Ordinance. In addition, the Project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels. Potential for vibration and

ground-borne noise would be minimal and would substantially attenuate with distance such that impacts at sensitive receptors would be less than significant.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

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

Discussion/Explanation:

Less than Significant Impact: The Project is located within the Fallbrook Community Airpark Land Use Compatibility Plan area (Review Area 2); however, it is not located within 2 miles of the Airpark, and it is not located within 1 mile of a private airstrip. Further, the Project would be unmanned with the exception of limited maintenance activities. Therefore, the Project would not expose people in the Project area to excessive airport-related noise levels. Impacts would be less than significant.

XIV. POPULATION AND HOUSING -- Would the project:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

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

Discussion/Explanation:

Less than Significant Impact: The Project is for the development of a battery energy storage facility. This physical change would not induce substantial population growth in the area because there would be no extension of new major infrastructure such as roadways or other infrastructure into previously unserved areas, and no regulatory changes are proposed that would allow increased population growth. In addition, the Project site and approximately 6 square miles of surround lands have a population of greater than 1,000 persons per square mile and is considered "urban" by the U.S. census. Therefore, impacts would be less than significant.

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

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

Discussion/Explanation:

No Impact: The Proposed Project would not displace any existing people or housing because the Project site is presently vacant.

XV. PUBLIC SERVICES

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

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

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

Discussion/Explanation:

Less than Significant Impact: Based on the service availability forms received for the Project, the Proposed Project would not result in the need for significantly altered services or facilities. Service availability forms have been provided which indicate existing services are available to the Project from the following agencies/districts: Fallbrook Public Utilities District and North County Fire Protection District. The Project does not involve the construction of new or physically altered governmental facilities, including, but not limited to, fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the Project would not have an adverse physical effect on the environment because the Project does not require new or significantly altered services or facilities to be constructed.

XVI. RECREATION

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

Discussion/Explanation:

No Impact: The Project does not 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.

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

Discussion/Explanation:

No Impact: The Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the construction or expansion of recreational facilities would not have an adverse physical effect on the environment.

XVII. TRANSPORTATION -- Would the project:

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

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

Discussion/Explanation:

San Diego Association of Governments (SANDAG) is the designated congestion management agency for the San Diego region. SANDAG is responsible for preparing the Regional Transportation Plan (RTP), of which the CMP is an element, to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate

land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak hour vehicle trips. These large projects must complete a traffic analysis that identifies the project's impacts on CMP system roadways, their associated costs and identify appropriate mitigation.

The County of San Diego has also 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. These new projects were based on SANDAG regional growth and land use forecasts, the SANDAG Regional Transportation Model was utilized to analyze projected buildout (year 2030) development conditions on the existing Mobility Element roadway network throughout the unincorporated area of the County. Based on the results of the traffic modeling, funding necessary to construct transportation facilities that will mitigate cumulative impacts from new development was identified. Existing roadway deficiencies would be corrected through improvement projects funded by other public funding sources, such as TransNet, gas tax, and grants. Potential cumulative impacts to the region's freeways have been addressed in SANDAG's RTP. The RTP, which considers freeway buildout over the next 30 years, will use funds from TransNet, State, and Federal funding to improve freeways to projected level of service objectives in the RTP.

Less than Significant Impact: The Project would not have a direct impact related to a conflict with any plans, ordinances, or policies addressing the circulation system. Project trips, or average daily trips (ADTs), associated with 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 grading and access road phase. This would be a short-term increase and would only occur during the duration of 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. Once operational, the system would be remotely operated, and traffic associated with Project maintenance site visits would occur only twice monthly on average. Estimated trip generation would be between 2 to 4 trips twice per month. 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. Further, payment of the TIF would be required at issuance of building permits.

Implementation of the Project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities, nor would it generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities. Therefore, the Project would not conflict with policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

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

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

Discussion/Explanation:

Less than Significant Impact: Per CEQA Guidelines Section 15064.3, *Determining the Significance of Transportation Impacts*, land use projects would be evaluated based on vehicle miles traveled. As discussed above, traffic associated with Project maintenance site visits would occur only twice monthly on average. Estimated trip generation would be between 2 to 4 trips twice per month. The Project would not generate sufficient traffic to require advanced CEQA review per the CMP. Impacts would be less than significant.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project would not substantially increase driving hazards due to a geometric design feature or incompatible uses. The proposed on-site access driveway would be used only by limited maintenance staff and emergency responders in the event of an emergency. Turning radius on the proposed access driveway would accommodate maneuverability of large trucks and vehicles, including fire trucks per County roadway standards.

Existing access to and from the Project site from East Mission Road would remain unchanged. A Sight Distance Analysis and Design Exception Request prepared for the Project has been approved by the Department of Public Works regarding safe and adequate minimum stopping sight distances for westbound and eastbound traffic on East Mission Road approaching the intersection with the Project driveway. The Sight Distance Analysis and Design Exception Request for the Project was approved based on consistency with American Association of State Highway and Transportation Officials (AASHTO) stopping sight distance criteria in lieu of County corner sight distance criteria. The Project was determined to not adversely affect traffic safety and flow of traffic in the area.

In addition, the Project would not place incompatible uses (e.g., farm equipment) on existing roadways. Therefore, the Project would not significantly increase hazards due to design features or incompatible uses. Impacts would be less than significant.

d) Result in inadequate emergency access?

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

Discussion/Explanation:

Less than Significant Impact: The Project would not generate traffic volumes that would impede emergency access. A FPP has been approved by North County Fire Protection District that 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. Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

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

Discussion/Explanation:

No Impact: No tribal cultural resources were identified within the Project area during the Cultural Resources Survey. Therefore, no impacts to listed or eligible for listing tribal cultural resources would occur.

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

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

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: The Native American Heritage Commission (NAHC) was contacted on May 5, 2017, for a review of the Sacred Lands File (SLF), to determine if any known Native American cultural properties (e.g., traditional use or gathering areas, places of religious or sacred activity, etc.) are present within or adjacent to the Project area. The NAHC responded on May 8, 2017, noting that the SLF search failed to indicate the presence of Native American cultural resources in the immediate Project area. The NAHC requested that Native American individuals and organizations be contacted to elicit information and/or concerns regarding cultural resource issues related to the Project. A letter describing the Project and asking these individuals and organizations for their input was sent via mail and electronic mail on December 12, 2017. As of the date of the Cultural Resources Survey report (October 2018), four responses had been received:

- **Agua Caliente Band of Cahuilla Indians:** A response was received from the tribe's Cultural Resource Manager, Katie Croft, on January 4, 2018 stating that the Project is not located in the tribe's traditional use area and that the letter concludes their consultation efforts.
- **lipay Nation of Santa Ysabel:** A response was received from the tribe's contact, Clint Linton, on December 15, 2017 stating that the tribe would defer to Cami at the San Luis Rey Band.
- **Pala Band of Mission Indians:** A response was received from the tribe's THPO, Shasta Gaughen, on December 13, 2017 stating that the Project is within the tribe's traditional use area and therefore, they request that documentation regarding the Project be provided to them and archaeological monitoring be conducted.
- **Jamul Indian Village:** A call was received from a representative of Jamul Indian Village stating that the tribe would be deferring to the Pala Band of Mission Indians.

Government-to-government consultation pursuant to Assembly Bill 52 is ongoing and is conducted by County staff.

No information has been obtained through Native American consultation or communication with the Native American monitors during fieldwork that there are any culturally or spiritually significant sites within the Project area. No Traditional Cultural Properties that currently serve religious or other community practices are known to exist within the Project area. During the archaeological survey, no artifacts or remains were identified or recovered that could be reasonably associated with such practices. No Tribal Cultural Resources were identified or reported from the Native American contacts.

As noted in Section V, Cultural Resources, Questions b) and c), monitoring of initial ground disturbance by a qualified archaeologist and Native American monitor would be implemented to mitigate potential impacts to sensitive resources, should subsurface resources be found during

the construction process. Thus, potential impacts tribal cultural resources, as defined in Public Resources Code §5024.1(c) would be less than significant with mitigation incorporated.

XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:

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

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

Discussion/Explanation:

Less than Significant Impact: The Project would include connection to the existing SDG&E 69-kV Avocado substation (approximately 450 feet to the west) via approximately 630 linear feet of underground cable/vaults along a proposed easement (off-site parcel APN 105-410-44). Proposed stormwater drainage facilities would include infiltration basins located in the northern portion of the fenced facility, as well as along the access driveway parcel (off-site parcel APN 105-410-10). In addition, connection to the existing Fallbrook Public Utility District water line along East Mission Road would be established at the Project entrance to supply water to the facility.. The Project would not require the construction or expansion of wastewater treatment facilities as no wastewater would be produced. Similarly, no natural gas or telecommunications facilities would be required. Therefore, the Project would not require the construction of new or expanded facilities, which could cause significant environmental effects.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project would not require restroom facilities or associated use of potable water. Minimal water required for low water/drought tolerant landscaping and fire suppression would be obtained through connection to Fallbrook Public Utility District. A 399W Water Availability Form was provided by the Fallbrook Public Utility District on December 3, 2018, indicating adequate water resources and entitlements are available to serve the requested water resources. Limited water required during the construction phase would be trucked in as

necessary. Therefore, the Project would have sufficient water supplies available to serve the Project.

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

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

Discussion/Explanation:

No Impact: The Project would be remotely operated and there would be no full-time employees at the site; therefore, no bathroom/septic facilities would be required. No wastewater would be produced; therefore, the Project will not interfere with any wastewater treatment providers service capacity.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project would be unmanned and would generate minimal solid waste. In addition, the Project proposes recycling, reduction, and reuse of construction materials. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency 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. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the Project's solid waste disposal needs and the Project would not impair the attainment of solid waste reduction goals.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project would be unmanned and would generate minimal solid waste. In addition, the Project proposes recycling, reduction, and reuse of construction materials. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency 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.). The Project would deposit all solid waste at a permitted solid waste facility and therefore, would comply with federal, state, and local statutes and regulations related to solid waste.

XX. WILDFIRE -- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

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

Discussion/Explanation:

Less than Significant Impact: The Project would not substantially impair an adopted emergency response plan or evacuation plan. Project access has been designed in conformance with State law, and local regulations, and in coordination with the North County Fire Protection District. A FPP has been approved by the North County Fire Protection District, dated October 30, 2018, that 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. Per North County Fire Protection District emergency vehicle requirements, the paved width of the Project access road would total 24 feet, including a hammerhead turnaround at the northern end of the facility. The 24-foot wide driveway heads south through the center of the facility and terminates with a 40-foot radius cul-de-sac at the southern end of the facility. Further, the Project would contribute its fair share towards funding the appropriate fire and emergency medical services to adequately serve the Project, as determined through required development fees. Therefore, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

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

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

Discussion/Explanation:

Less than Significant Impact: The Project is not listed as a high fire hazard area but is located within the Urban-Wildland Interface Zone. A FPP and landscape plan has been prepared for the Project, and approved by the North County Fire Protection District. 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. Implementation of these fire safety standards would occur during the building permit process.

In addition, a Fire Service Availability Letter and conditions, dated December 13, 2018, has been received from the North County Fire Protection District. The conditions from the North County Fire Protection District as outlined in the FPP include: location of fire hydrants along fire access driveways and roadways to meet operational needs, and at intersections (i.e., access road/East Mission Road and access road terminus/ Project driveway) and intervals pursuant to the Fire Code; 2,500 gallons per minute fire flow in water main; adequate access road a minimum of 24 feet wide, paved surface suitable for a 75,000 pound fire apparatus; driveway grade of no more than 4 percent slope; turn-around provisions at dead-end fire access roads in excess of 150 feet; driveway terminating in a 40-foot radius cul-de-sac; minimum vertical clearance of 13 feet 6 inches for the entire width of fire access road; North County Fire Protection District-approved Knox box key opener on 24-foot gate across access road; automatic fire sprinklers and fire suppression systems with early smoke detection, alarms, and remote monitoring; minimum 100-foot fuel management zone around structures over 250 square feet in size maintained annually or as needed; and fire resistant construction. The Fire Service Availability Letter indicates the expected emergency travel time to the Project site to be 2 minutes. The Maximum Travel Time allowed pursuant to the Safety Element is 5 minutes. The project site does not contain any steep slopes and is gently sloping with elevations ranging from approximately 789 to 832 feet above mean sea level. The project site is located inland near the downtown community of Fallbrook and is subject to westerly breezes, and possible events of Santa Ana winds. However, the Project facility 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. Based on review of the Project by County staff, through compliance with the County Fire Code and Consolidated Fire Code, and through compliance with the North County Fire Protection District's conditions, impacts would be less than significant.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

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

Discussion/Explanation:

Less than Significant Impact: As discussed above, the Project facility would be unmanned and would require minimal maintenance and landscaping. The Project has been located and designed to avoid flammable vegetation and is consistent with the North County Fire Protection Districts Weed Abatement Ordinance. In addition, the proposed transmission lines connecting the facility to Avocado substation would be underground, reducing the risk of exacerbation to wildfire. The facility would be maintained per the FPP and landscape plan that has been approved by the North County Fire Protection District. Further, a 100-foot Fuel Management Zone would be established and maintained around all structures of the project as a condition of approval. Therefore, based on Project coordination with County staff, compliance with the County Fire Code and Consolidated Fire Code, and compliance with the North County Fire Protection District's conditions, impacts associated with fire risk would be less than significant.

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

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

Discussion/Explanation:

Less than Significant Impact: As previously stated in response XX(b), the Project site topography is gently sloping. A Stormwater Management Plan and Drainage Study has been prepared for the Project to ensure adequate drainage. Proposed new stormwater drainage facilities would include a large infiltration basin located at the northern end of the facility, as well as two smaller basins along the proposed access driveway to capture runoff. In addition, pursuant to the Geotechnical Investigation, the potential for landslides at the Project site is low due to the minimal grading required at the site. Therefore, impacts from downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would be considered less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

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

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

Discussion/Explanation:

Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition to Project specific impacts, this evaluation considered the Proposed Project's potential for significant cumulative effects. As a result of this evaluation, the Proposed Project was determined to have potential significant effects related to air quality, biological resources, cultural and tribal resources, and hazards and hazardous materials. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes:

- Air Quality: Use of at least Tier 3 or better diesel equipment fitted with diesel particulate filters (DPF) to mitigate a cumulatively considerable net increase of criteria pollutants for which the Project region is non-attainment, and exposure of sensitive receptors to substantial pollutant concentrations;
- Biological Resources: The applicant shall purchase 1.41 acres of coast live oak woodland mitigation credits and dedicate an on-site open space easement with fencing, signage and dedication of a limited building zone. The applicant would also be required to comply with the Bird Migratory Treaty Act and obtain permits (if required) under Section 404 of the Clean Water Act; and
- Cultural and Tribal Resources: Monitoring of all ground disturbing activities by a qualified archaeologist and Luiseno Native American monitor and the preparation of a Research Design and Data Recovery Program if any significant resources are found, to mitigate potential impacts to archaeological or tribal resources or human remains.

As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this Project would result. Therefore, this Project has been determined not to meet this Mandatory Finding of Significance.

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

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation:

The following list of past, present and future projects located within a 1-mile radius of the Project were considered and evaluated as a part of this Initial Study:

PROJECT NAME	ADDRESS	PROJECT NUMBER	APN
McDaniel Fruit Company	937 E Mission Road, Fallbrook, CA 92028	PDS2009-3993-09-015	1055403200
St Peter’s Catholic Church MUP	404 S Stage Coach Lane, Fallbrook, CA 92028	PDS2004-3300-65-041	1056401700
CA8468-Willow Glen MUP	2119 Mission Road, Fallbrook, CA 92028	PDS2005-3300-05-056	1051121100
Salem Carwash & Oil Change, P10-015 MUP	936 E Mission Road, Fallbrook, CA 92028	PDS2010-3300-10-015	1055405600
The Crest MUP Modification	1911 Gum Tree Lane, Fallbrook, CA 92028	PDS2004-3301-00-006-01	1054500300
St John’s Anglican Church MUP TE	320 S Stage Coach Lane, Fallbrook, CA 92028	PDS2006-3381-00-040	1052816200
St John’s Anglican Church MUP TE	320 S Stage Coach Lane, Fallbrook, CA 92028	PDS2006-3381-00-040	1052812500
St John’s Anglican Church MUP TE	320 S Stage Coach Lane, Fallbrook, CA 92028	PDS2006-3381-00-040	1052816000
AT&T Mobility, 4D0663 Fallbrook P09-022 Minor Use Permit Modification	550 E Ivy Street, Fallbrook, CA 92028	PDS2010-3401-03-051-01	1031830800
SD0663 Olive Hill Minor Use Permit Modification	No Address	PDS2012-ZAP-03-051W3	1031830800
Walz STP	21348 Bresa De Loma Dr, Escondido, CA 92029	PDS2002-3500-02-055	1054107100
Village Medical Center STP	585 E Elder Street, Fallbrook, CA 92028	PDS2004-3500-04-056	1042911000
McDaniels Fruit Company STP	336 Industrial Way, Fallbrook, CA 92028	PDS2006-3500-07-005	1055408800
Rashkin Design Review Exemption STP	No Address	PDS2013-STP-13-026	1054109400
Industrial Way III STP	550 Industrial Way	PDS2009-3500-97-014	1054109200

Vine Street Apartments STP	No Address	PDS2016-STP-16-026	1031160700
Rashkin Design Review Exemption STP	No Address	PDS2013-STP-13-026	1054109700
Rashkin Industrial Buildings STP TE	No Address	PDS2015-STP-13-026TE	1054109400
Alvarado Knolls TM5215	137 Gardenside Court, Fallbrook, CA 92028	PDS2003-3100-5215	1058700100
Elder Subdivision TM	No Address	PDS2006-3100-5493	1058116000
Barr Ranch TM-5293TE	No Address	PDS2017-TM-5293TE	1058410300
The Arbors TE	No Address	PDS2016-TM-5268TE	1053801900
Alkema TPM	No Address	PDS2005-3200-20928	1054216500
Rosemere Lane TPM	No Address	PDS2005-3200-20901	1058413200
Zebu Construction & Design TPM	No Address	PDS2003-3200-20584	1058410600
Aguilar TPM In Fallbrook	495 Beaver creek Lane, Fallbrook, CA 92028	PDS1998-3200-20359	1056407400
Matheny TPM	25617 Rue De Lac, Escondido, CA 92026	PDS2006-3200-21024	1052424000
Arena TPM	No Address	PDS2013-TPM-21199	1055145100
Hudak, TPM, 3 Lots	No Address	PDS2007-3200-21110	1054215900
Dawson TPM	No Address	PDS2013-TPM-21209	1040552300
Lavender Hill Charter School TPM	304 Sky Vista Way	-	1054211000

MUP – Major Use Permit
STP – Site Plan
TE – Time Extension
TM – Tentative Map
TPM – Tentative parcel map

Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in Sections I through XIX of this form. In addition to Project specific impacts, this evaluation considered the Project’s potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there were determined to be potentially significant cumulative effects related to Air Quality, Biological Resources, Cultural and Tribal Cultural Resources. However, mitigation has been included that clearly reduces these cumulative effects to a level below significance. This mitigation includes:

- Air Quality:
- Biological Resources:
- Cultural and Tribal Resources:

As a result of this evaluation, there is no substantial evidence that, after mitigation, there are cumulative effects associated with this Project. Therefore, this Project has been determined not to meet this Mandatory Finding of Significance.

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

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

Discussion/Explanation:

In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in Sections I. Aesthetics, III. Air Quality, VII. Geology and Soils, IX. Hazards and Hazardous Materials, X Hydrology and Water Quality, XIII. Noise, XIV. Population and Housing, and XVII. Transportation and Traffic. As a result of this evaluation, there were determined to be potentially significant effects to human beings related to the following: Air Quality. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes the following measures:

- Air Quality: Use of at least Tier 3 or better diesel equipment fitted with diesel particulate filters (DPF) to mitigate a cumulatively considerable net increase of criteria pollutants for which the Project region is non-attainment, and exposure of sensitive receptors to substantial pollutant concentrations; and

As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this Project. Therefore, this Project has been determined not to meet this Mandatory Finding of Significance.

XX. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

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