INITIAL STUDY
GOAL LINE RELIABILITY PROJECT
ESCONDIDO, CA

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TABLE OF CONTENTS

Page

LIST OF TABLES

Page

LIST OF FIGURES

Page

SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

1.1 PROJECT OVERVIEW

Onward Energy proposes to construct, own, and operate the Goal Line Reliability Project (Project), a lithium-ion battery energy storage facility capable of delivering up to 50 MW of energy storage with an 8-hour capacity rating on approximately 4.5 acres within the approximately 6.5-acre site containing an existing electrical generation facility and a non-operational ice-rink facility (Project Site). Energy stored in the Project will then be discharged into the grid when the energy is needed, providing important electrical reliability services to the local area. It is expected that between two to four staff members will visit the site weekly and as needed for maintenance and monitoring of the Project. The Project will be operated remotely with no permanent on-site operations personnel. No changes are proposed to the existing electrical generation assets or operations as part of the Project.

1.2 PROJECT DESCRIPTION

The approximately 6.5-acre Project Site is located at 555 Tulip Street, within Escondido, California, 92025 (Figure 1). The Project Site currently contains a non-operational ice-rink and a 50 MW natural gas power plant (Figure 2). The existing ice-rink will be demolished and the Project facilities will be constructed in its place. The parking facilities and other structures adjacent to the natural gas power plant facilities, which will remain. This includes an area of approximately 4.5 acres.

1.3 FACILITIES DESCRIPTION

The Project will be capable of delivering energy storage services to the electrical transmission grid through SDGE's Esco substation. The major components of the Project are described below and summarized in Table 1-1. The ultimate make, model, and manufacturer of the batteries, including equipment sizing and count, is still under consideration. As such, details associated with Project facilities is intended to "envelope" the foreseeable component models available at the time of Project construction. Exact dimensions and specifications are dependent on technology selection; however, the following information is a reasonable "worst case" assumption for the purposes of permitting and analyzing impacts from the Project.

Batteries housed within BESS Enclosures: The Project consists of lithium-based battery modules installed in racks and housed within purpose-built outdoor Battery Energy Storage System (BESS) enclosures. A typical BESS enclosure will house hundreds of battery modules where each enclosure is typically capable of storing between 0.4 to 5 megawatt-hours (MWh) of energy.

Each individual module within an enclosure is equipped with integrated operational management systems, fire and safety systems (HVAC systems, ventilation, gas, heat and smoke detection and alarms, and fire suppression systems) all designed, constructed, and operated pursuant to the version of the California Fire Code in effect at the time of building permit issuance. The modules within each enclosure are accessed for maintenance from the outside via cabinet doors.

The dimensions of a typical BESS enclosure vary between manufacturers and are arranged in repeated "blocks" across the site. System blocks may consist of a single enclosure, or several smaller enclosures set side-by-side to create banks of batteries with similar overall dimensions. Smaller enclosures are typically closely spaced or physically attached at the time to construction, and larger enclosures are placed in

smaller groupings or individually. An enclosure grouping typically consist of 4 to 12 enclosures measuring approximately 30 feet long by 6 feet wide with a height of 10 feet. Smaller enclosures may be as small as 3.5 feet long by 5 feet wide by 8 feet tall while larger enclosures may measure over 50 feet long by 12 feet wide with a height of up to 20 feet. Enclosures may also be double stacked if designed to do so, which is anticipated for this Project. However, the number, size, layout, and capabilities of each enclosure will vary depending on the battery, enclosure manufacturer design, and BESS system manufacturer(s) selected for the Project. Regardless of the system manufacturer, the Project's developed footprint and overall capability will remain substantially the same. In some instances, the battery enclosures may contain inverters which convert low voltage direct current (DC) to alternating current (AC) (and vice-versa when charging).

Current technological selections include two options for mounting HVAC on the containers: side mounted and top mounted. Each individual module is monitored and controlled to ensure safe and efficient operations. Battery enclosures will be placed within a defined and stable total footprint on the Project site.

Power Conversion System (PCS): Low voltage DC cables will connect the battery enclosures to low profile, pad-mounted PCS inverter-transformers located adjacent to each enclosure. Inverters within the PCS convert electricity from low voltage DC to low voltage AC when power is being taken (discharged) from the battery into the grid. The opposite occurs when charging the battery from the grid. A medium voltage transformer within the PCS is used to convert the low voltage AC current to medium voltage AC current and vice versa.

Medium Voltage (MV) Transformers: As stated above, in some instances the inverter is contained within the battery enclosures and a stand-alone transformer is used instead of a PCS. In this instance, the MV Transformer equipment is connected directly to the battery enclosures via low-voltage AC wiring. Additional MV Transformers, also referred to as Auxiliary Transformers, will also be sited to provide power to auxiliary equipment and other site electrical needs such as lighting, receptacles, and life-safety equipment and to power the PDC.

Outdoor Electrical Equipment: Other additional electrical equipment such as electrical cabinets and panels will be installed outside the BESS enclosures within the site area. This equipment is smaller in size than the equipment listed above and is distributed through the site as needed based on the design parameters of the battery and power conversion equipment chosen. In addition, buried cable will be placed throughout the site to connect power and communications to individual components and to the Project Substation. All outside electrical equipment will be housed in the appropriate National Electrical Manufacturers Association (NEMA) rated enclosures.

Power Distribution Center (PDC): The PDCs are enclosures that house and protect key Project electrical, communication and command equipment located near the Main Power Transformers.

Main Power Transformer (MPT): The Main Power Transformers step-up the medium voltage electricity from the inverter-transformer to the high-voltage level of the transmission system, delivering it into the grid via a high-voltage generation tie-line.

Generation tie-line: The Project will interconnect to the existing, adjacent SDGE Esco Substation via an existing overhead generation tie-line.

Other Site Design Features: The Project includes other essential design features to ensure safety, security, and efficiency as well as compliance with all building, fire, and health and safety regulations, including setbacks, fire-operations access roads, security fencing and lighting, and separation between equipment and other features. Drainage facilities will be installed to route stormwater to the existing on-site storm drain systems in a manner generally consistent with the existing facilities.

Table 1-1. Project Equipment Details

Equipment	Description	Number of Units/Size of Footprint in Acres	Height
Battery Containers with Top Mounted A/C	Integrated battery, battery controls and ancillary equipment with HVAC.	Approximately 4.5 acres	Up to 20 feet
Battery Containers with Side Mounted A/C	Integrated battery, battery controls and ancillary equipment with HVAC.	Approximately 4.5 acres	Up to 25 feet
PCS's and/or MV Transformers	Power conversion systems (PCS) inverters and LV-MV Transformer equipment and skids	Contained within the approximately 4.5 acres of battery containers	10 feet
PDC	Power Distribution Center - substation controls building	Contained within the approximately 6.5 acres of overall project area	20 feet
MPT (aka GSU)	Main power high voltage transformer	Contained within the approximately 6.5 acres of overall project area	30 feet; static masts up to 100 feet
Auxiliary Transformers	MV-LV Auxiliary Transformers for equipment back-feed power	Approximately 5; Contained within the approximately 4.5 acres of battery containers	10 feet
Transmission Towers/Poles	Steel monopole or wood pole electrical transmission structures	Up to 2, depending on interconnection conditions	Up to 100 feet depending on interconnection conditions
Other lighting, electrical, safety, communications, and security equipment	Various	–	Switchgear cabinets and power distribution panels up to 10 feet; junction boxes and telephony equipment up to 8 feet

Access to the Project site will be provided via two driveways from Tulip Road. Site access will comply with City and County regulations in order to provide access to operational, fire department, and emergency vehicle access to the facility. The site plan proposes to abandon the two existing central drives and adjust the existing sidewalk accordingly.

The Project Site currently has retail electrical, telecommunications, water, sanitary sewer, storm sewer and natural gas services. No sanitary sewer or natural gas connections are proposed as part of the Project

with the existing services to the existing natural gas plant to remain in place. Additional storm sewer connections and fire water connections will be made on an as-needed basis, as determined by final equipment selection. Reconfiguration of retail electrical infrastructure is anticipated with the demolition phase. On-site upgrades to telecommunications infrastructure are anticipated. However, no significant offsite system upgrades are anticipated to any utilities at this time.

1.4 PROJECT LOCATION AND LAND USE DESIGNATION

The Project Site is located within the City of Escondido's (City) General Plan land use designation of General Industrial (GI) and is within the Planned Development – Industrial (PD-I) zone (Figures 3 and 4). The Project is surrounded by developed parcels consisting of businesses such as a building materials supplier to the northwest, construction and paint businesses to the north, and the Plaza Las Palmas shopping mall to the south across the channel. Interstate 15 borders the Project site to the south.

The Project includes a Zoning Map Amendment (ZMA) to amend the underlying zoning designation to General Industrial (M-2). With a zoning change to M-2, the Project site would be consistent with the City's zoning. This designation permits a wide range of manufacturing warehousing/distributing, assembling and other heavy or intensive uses. This designation allows "utilities," including the Project. Under Section 33-564 of the Municipal Code, utilities are considered a permitted use within the M-1 and M-2 zone. Additionally, the Project includes a Zoning Text Amendment (ZTA) to modify existing fence standards to allow for an increase in fence height on a case-by-case basis. Finally, the Project will require a Major Plot Plan for the construction of the energy storage facility.

The following entitlements are required from the City:

- Zone Map Amendment to amend the City's Zoning Map
- Zone Text Amendment to amend the City's Zoning Ordinance to allow for an increase in fence height on a case-by-case basis
- Major Plot Plan for the development of the site for the purposes of the energy storage facility.

Figure 1 - Project Location and Vicinity Map

Figure 2 – Project Site Plan

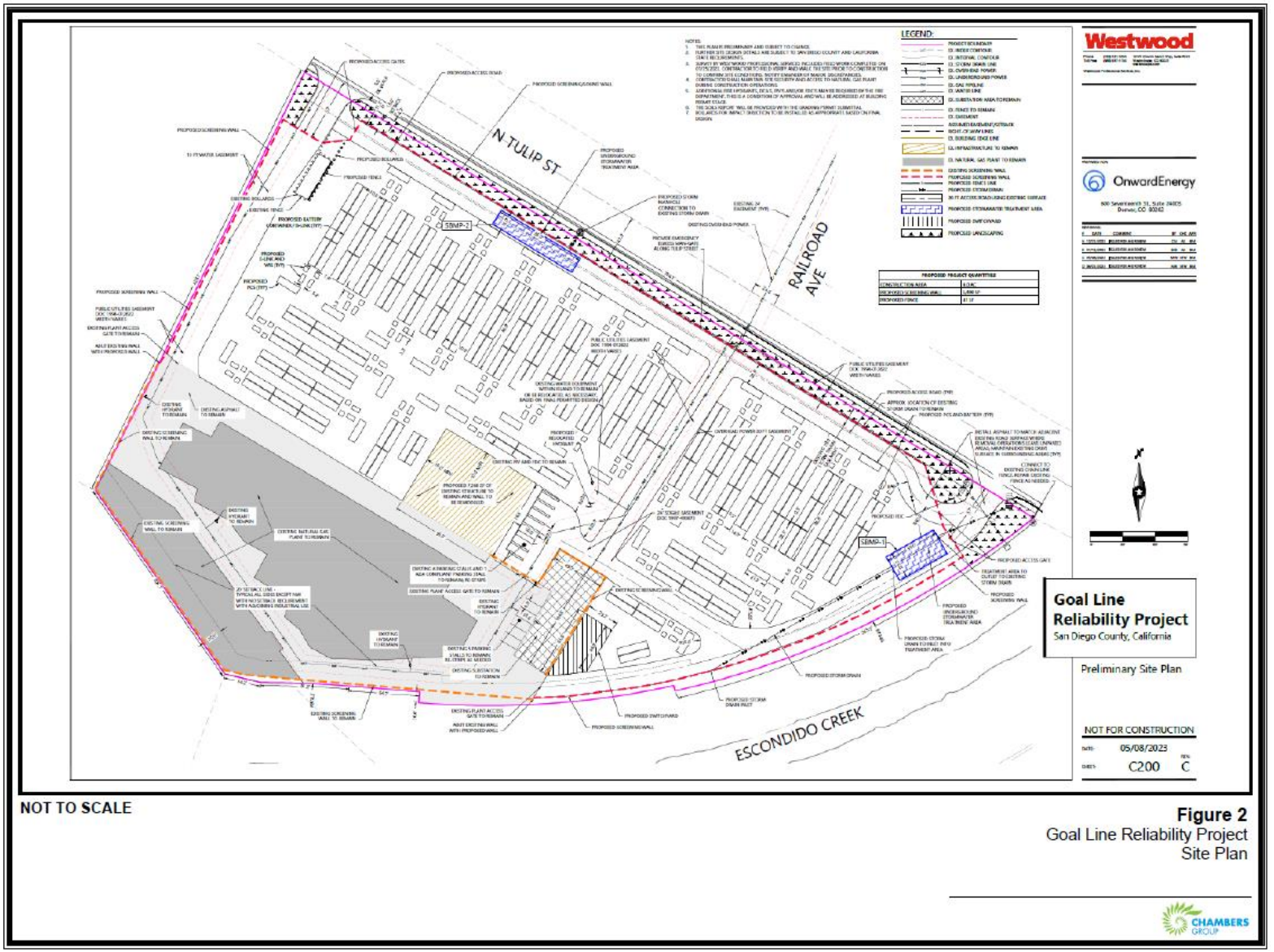


Figure 3 – Land Use/General Plan Map

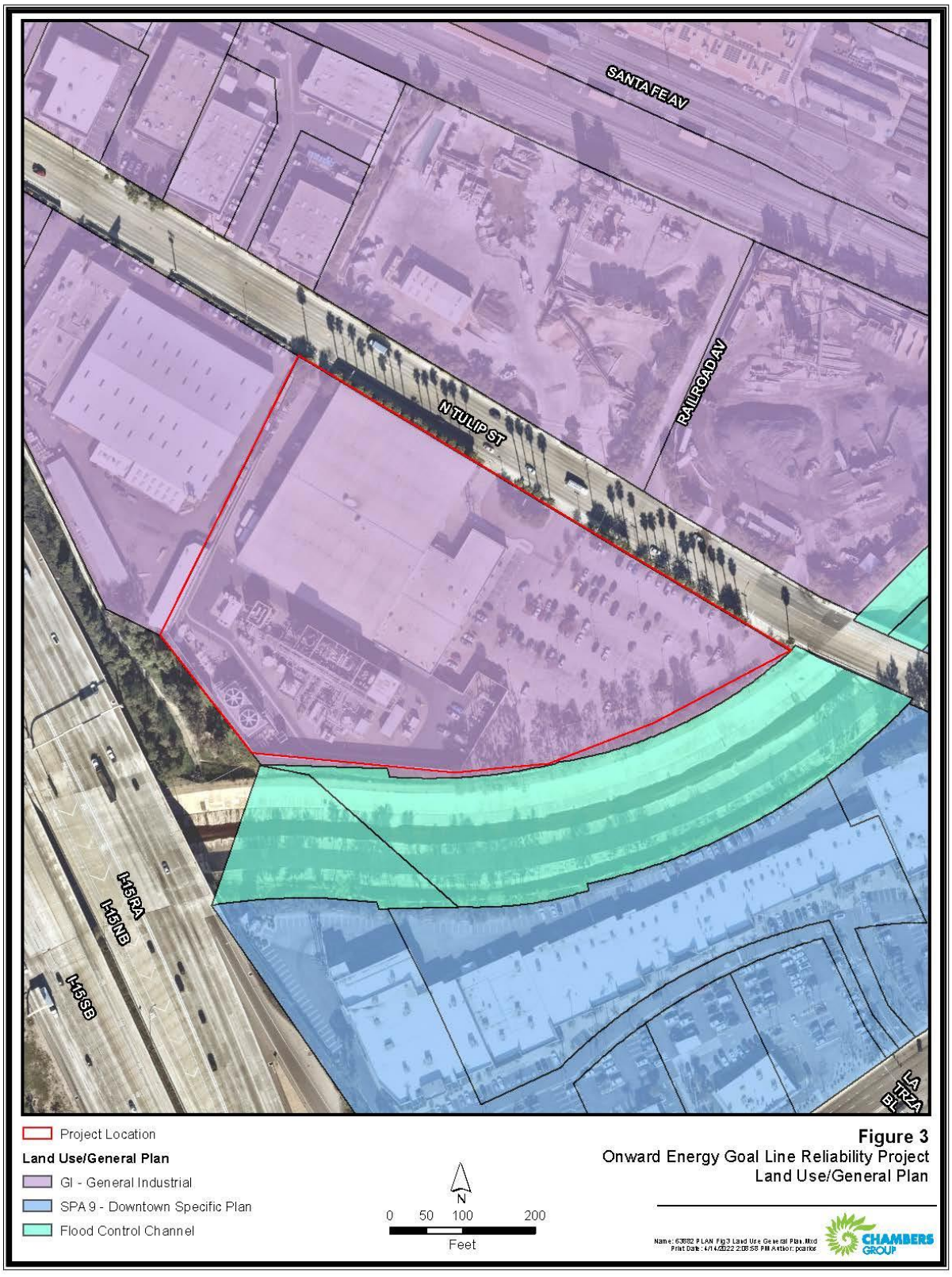
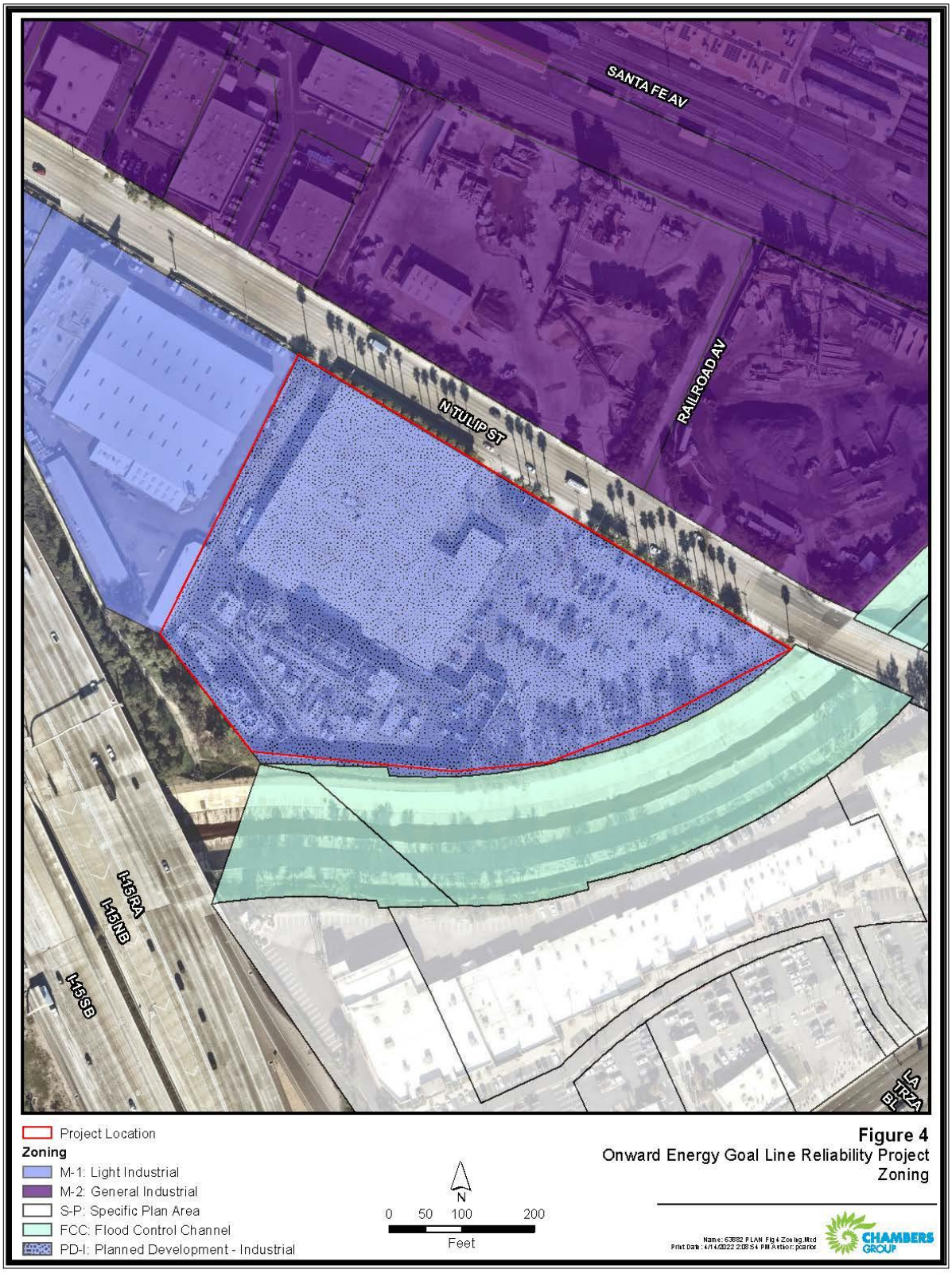


Figure 4 – Zoning Map



1.5 PROJECT CONSTRUCTION

Project construction will be conducted in two parts[1]:

1. Demolition Phase: demolition of existing facilities

2. Construction Phase: construction of BESS containers

Project construction includes demolition of the existing facility, site preparation and grading, installation of drainage and retention basins, foundations/supports, setting battery enclosures, wiring and electrical system installation, and assembly of the accessory components including inverter transformers and generation step-up transformers. Earth cut and fill are proposed to be balanced within the Project site such that no import of fill material or export of in-situ material is proposed. Due to unknown site conditions beneath the existing infrastructure, this may need to be modified after demolition operations. Up to 30,000 cubic yards of material may need to be imported if site conditions require mitigation.

Further, it is anticipated that approximately 5,000 cubic yards of surfacing (asphalt and/or open graded crushed rock aggregate) and trench fill material will be required.

Raw materials required for construction include gravel for roads and pads; concrete, sand, and cement for foundations; and water for concrete, dust control, and erosion controls. Table 1-2 provides anticipated construction workforce and examples of typical heavy equipment that may be used during Project construction activities.

Table 1-2. Construction Workforce and Equipment Required for a Typical Battery Storage Facility

Construction Activity	Workforce	Typical Construction Equipment *
Demolition	12	Dozer, bobcat, dump truck

[1] An earlier version of the Project contemplated a second phase, capable of delivering up to an additional 400 MWh of stored energy. As the Project moved through design, it was determined that implementation of this second phase was not feasible. The primary difference between the Project that is currently defined, and the prior iteration is that BESS containers will not be stacked and therefore fewer will be located within the site. The Project's footprint is materially the same. Much of the analysis contained herein is substantially similar to that of the current Project, however analyses specific to air quality and noise was performed using the number of containers specific to the larger Project and additional construction phasing. This represents an assessment of impacts that is necessarily greater than the Project, as currently defined. Therefore, the analysis contained herein is intended to be an incredibly conservative impact assessment and an overestimation of impacts compared to the proposed Project.

Construction Activity	Workforce	Typical Construction Equipment *
Foundations	30	Dozer, grader, excavator or drill rig, crane, concrete pump trucks, concrete trucks, pickup trucks with trailers, all terrain forklifts, water trucks, dump trucks, compactors, generators, welders
Fence Construction	10	Forklift, backhoe, pickup trucks
Roads	7	Dozer, grader, front end loaders, compactor, roller, pickup trucks, water trucks, dump trucks, compactors, scrapers
Battery Placement	20	Crane, forklift, pickup trucks
Laborers	50	Pickup trucks
Owner Representatives	6	Pickup trucks
Battery Supplier	40	Pickup trucks
Total Number of Workers:	**175**	

* Equipment primarily runs on diesel fuel

The sequence of Project construction activities for each phase would generally occur as follows, and will be repeated for Phase 1 and Phase 2:

1. Installation of erosion control best management practices (BMPs)
2. Demolition of existing facility
3. Equipment staging and mobilization
4. Site preparation and mass grading and compaction
5. Trenching for electrical cables, wires, and conduits
6. Install below-ground conduit banks and conduit and backfill of trenching
7. Earthwork Preparation of equipment foundations
8. Pour-in-place concrete footings, pad foundations, and/or piers and install driven pilings
9. Foundation backfill and site compaction (as necessary)
10. Install PCS, power distribution systems, BESS, and pad-mounted transformers
11. Pull cables and connect equipment
12. Install above-ground utilities
13. Placement of finished surface material
14. Install safety features, permanent fencing, and security lighting
15. Commissioning
16. Removal of BMPs

The approximately 10 acre-feet of water required during construction is expected to be provided by municipal sources through a temporary on-site hydrant meter.

1.6 PROJECT SCHEDULE

The proposed construction schedule includes approximately 6 months for demolition and 15 months for Phase 1 construction. Phase 2 construction will follow Phase 1 at a yet to be determined time. This duration is required to conduct grading activities, install facility equipment, and interconnect to the transmission infrastructure. Additional offsite infrastructure upgrades to existing offsite facilities may be

required with Phase 2. Seasonal constraints are not anticipated to preclude construction from occurring in accordance with this schedule (Table 1-3).

Table 1-3. Construction Schedule

Approximate Duration	Construction Activity
6 months	Demolition of existing facilities slated for Phase 1 activities
Up to 3 months	Commence Phase 1 Grading Activities
12 months	Phase 1 BESS Equipment Construction (trenching, foundations, etc.)
15 months	Installation of Phase 1 Equipment and Commercial Delivery (concurrent with Phase I BESS Equipment Construction)
3 months	Phase 1 Reclamation Complete
TBD	Phase 2 demolition and construction

1.7 OPERATIONS AND MAINTENANCE

The Project will operate 24 hours per day/seven days per week. It will be operated remotely, with no new buildings or parking areas. It is estimated that maintenance will include two to four staff performing maintenance visits weekly and as needed.

In addition to regularly scheduled maintenance and as part of Project operations, augmentation of batteries and battery enclosures will be required. Depending on technology selection, augmentation could include replacement of batteries within enclosures and/or the phased installation of additional BESS enclosures throughout the life of the Project, beyond what is needed to be installed during the "beginning of life" up to the permitted footprint of the Project. In order to fully analyze potential impacts from the Project, all possible battery enclosures that would be constructed and operated through the life of the Project have been included in Projects planning and impact assessments.

SECTION 2.0 – ENVIRONMENTAL DETERMINATION

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

☐ *Aesthetics*	☐ *Agriculture and Forestry Resources*	☐ *Air Quality*
☒ *Biological Resources*	☒ *Cultural Resources*	☐ *Energy*
☒ *Geology /Soils*	☐ *Greenhouse Gas Emissions*	☐ *Hazards & Hazardous Materials*
☐ *Hydrology /Water Quality*	☐ *Land Use / Planning*	☐ *Mineral Resources*
☐ *Noise*	☐ *Population / Housing*	☐ *Public Services*
☐ *Recreation*	☐ *Transportation*	☒ *Tribal Cultural Resources*
☐ *Utilities /Service Systems*	☐ *Wildfire*	☐ *Mandatory Findings of Significance*

2.2 DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐
2. I find 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. ☒
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐
4. I find that the proposed project **may have a "potentially significant impact" or "potentially significant unless mitigated impact"** on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐
5. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature	7-10-23 Date
A. Finestone Name	City Planner Title

SECTION 3.0 – 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. 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 onsite, 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, or less than significant. "Potentially Significant Impact" is appropriate if substantial evidence exists that an effect may be significant. If one or more "Potentially Significant Impact" entries are marked when the determination is made, an EIR is required.
4. "Negative Declaration: 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 (mitigation measures from earlier analyses may be cross-referenced).
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 Measures Incorporated," describe the mitigation measures which 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. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. 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 significant.

**Note: Instructions may be omitted from final document.*

SECTION 4.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

4.1 AESTHETICS

1.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse 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?	☐	☐	☐	☒
(c)	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?	☐	☐	☒	☐
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

Less than Significant. The City of Escondido (City) provides a distinct character from other communities in the region with its series of valleys surrounded by hillsides and ridgelines. Scenic natural features are scattered throughout the City that include creeks and riparian areas, rock outcroppings and lakes. Other large open areas showcase parks, Multiple Habitat Conservation Program (MHCP) lands and other designated conservation areas. In additional to natural formations, the City includes man-made scenic resources that include prominent vegetation such as street trees and ornamental trees, agricultural lands, and landmarks (City 2012).

The Project would not have a substantial adverse effect on a scenic vista. The Project site is developed and within an industrial zoned area. There are no designated scenic resources within the Project site. The Project site contains existing structures which would be demolished and replaced with new structures that would match the existing design and aesthetics of the area. The existing views from the Project site would remain consistent with the existing conditions. Due to the existing design and aesthetics of the Project site, and with the lack of scenic resources within the Project site, impacts would be less than significant.

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

No Impact. Scenic roadways within the City include portions of Interstate 15, segments of Del Dios Highway, Via Rancho Parkway, Bear Valley Parkway, and Lake Wohlford Road. The Project is located within an industrial zoned area of the City east of Interstate 15. The Project site is not located near a designated or eligible state scenic highway (Caltrans 2022). No impact would occur.

c) *Would the project 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?*

Less than Significant Impact. The Project site is located in an industrial and developed area of the City. The Project would not result in degradation of the existing visual character because the proposed construction of the new facility would be a permitted use within the industrial zone. The Project site contains structures that would be demolished, and new structures would be built in its place. The design of the new structures, including the security wall/fencing, would be compatible with the surrounding because of the industrial aesthetic of both the Project site and the area. Additionally, and designs of the walls and fencing shall require approval through the City's Development Services Department. Impacts, therefore, are less than significant.

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

Less than Significant Impact. The demolition and construction of the Project site would introduce new light and glare with the presence of construction equipment which would be limited during the construction phases. Once constructed, the Project site would have similar lighting that is required for industrial facilities including security lighting. Because the Project site will be unmanned during the majority of its operations outside of weekly and as needed maintenance, it would not result in a significant increase in lighting to the area. Impacts therefore are less than significant.

4.2 AGRICULTURE & FORESTRY RESOURCES

2.	**AGRICULTURE & FOREST RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

2.	**AGRICULTURE & FOREST RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or the conversion of forest land to non-forest use?	☐	☐	☐	☒

4.2.1 Impact Analysis

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

No Impact. The Project Site is located within the City's General Industrial land use designation and is zoned Planned Development – Industrial (PD-I) The Project site is developed and currently contains a non-operational ice-rink and a 50 MW natural gas power plant. The California Department of Conservation categorizes the site as *Urban and Built-Up Land* because it has been previously disturbed and developed. Therefore, the Project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide of Importance (DOC 2022). The Project would have no impacts on farmland.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. As mentioned above, the Project site is zoned Planned Development – Industrial (PD-I)which is not an agricultural zone. The Project site is not located within or adjacent to land under a Williamson Act contract. The Project site lies between commercial, and industrial areas. Thus, the Project would have no impact to existing zoning for agricultural use or a Williamson Act contract.

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

No Impact. The Project site comprises previously disturbed land located within an urban, developed area of the City. Zoning of the Project site is Planned Development – Industrial (PD-I), which is not a forest or timber land zone. No designated forest lands or timberland production zones are in the vicinity of the Project site. Surrounding land uses include commercial and industrial. No impacts to forest resources would result from the Project.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project site comprises previously disturbed land located within an urban, developed area of the City. Zoning of the Project site is Planned Development – Industrial (PD-I), which is not forest land and no designated forest lands are in the vicinity of the Project site. The Project would not result in the loss of forest land, nor would it convert forest land to non-forest use. No impacts to forest resources would result from the Project.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or the conversion of forest land to non-forest use?

No Impact. As previously mentioned in Impacts 4.2 (a) through (d), the Project site does not contain, nor is it near, farmland or forest land; therefore, the Project would not result in the conversion of Farmland to nonagricultural use or the conversion of forest land to non-forest use. No impacts would occur.

4.3 AIR QUALITY

3.	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:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
(d)	Result in other emissions, such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

An air quality analysis was performed by Ldn Consulting, Inc. (Ldn Consulting) in October 2022. The analysis was completed to determine potential air quality impacts associated with construction and operation of the Project under federal, state, and regional standards.

Air Quality impacts related to construction and daily operations were calculated using the latest CalEEMod 2020.4.0 air quality model, which was developed by BREEZE Software for South Coast Air Quality Management District (SCAQMD) in 2021. The construction module in CalEEMod is used to calculate the emissions associated with the construction of the project and uses methodologies presented in the USEPA AP-42 document with emphasis on Chapter 11.9.

4.3.1 Impact Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and regional plans (CEQA Guidelines Section 15125). The regional plan that applies to the Proposed Project includes the San Diego Air Pollution Control District's (SDAPCD) Regional Air Quality Strategy (RAQS), which was developed to provide control measures to try to reach criteria pollutant standards set by the State Implementation Plan (SIP). The RAQS relies on population and projected growth in the County, mobile, area, and all other source emissions in order to predict future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Mobile source emission projections and growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, projects that are consistent with the growth anticipated by the General Plan would be considered consistent with the RAQS. The Project site is consistent with the General Plan land use category and zoning for the site. Based on this, the Project was accounted for in the City's General Plan. Therefore, no cumulative operational impacts are anticipated since the Project would be consistent with the RAQS and SIP. Impacts would be less than significant.

b) Would the project 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?

Less than Significant Impact. The Proposed Project would not 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. The following section calculates the potential air emissions associated with the construction and operations of the Proposed Project and compares the emissions to the significance thresholds established in the City's municipal code.

Construction Emissions

The CalEEMod model was used to calculate the construction-related emissions from the Proposed Project and the input parameters used in this analysis are detailed in Attachment A of Appendix A. Construction emissions from the construction operations and equipment identified in Section 1.5 is provided in Table 4-1 below.

Table 4-1. Expected Construction Emissions Summary

Year	ROG	NO_X	CO	SO_2	PM_{10}			$PM_{2.5}$		
					Dust	Exhaust	Total	Dust	Exhaust	Total
2023	2.10	20.97	19.13	0.04	0.67	0.93	1.60	0.12	0.86	0.97
2024	1.46	13.19	17.76	0.04	1.46	0.48	1.78	0.30	0.46	0.63

Year	ROG	NO_X	CO	SO_2	PM_{10}			$PM_{2.5}$		
					Dust	Exhaust	Total	Dust	Exhaust	Total
2025	1.38	12.42	17.59	0.03	0.66	0.43	1.09	0.18	0.41	0.58
2026	1.46	12.96	21.09	0.04	1.46	0.41	1.74	0.30	0.39	0.57
2027	1.73	15.72	22.57	0.04	0.66	0.53	1.19	0.18	0.50	0.68
Significance Threshold	**75**	**250**	**550**	**250**	**–**	**–**	**100**	**–**	**–**	**55**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**	**–**	**–**	**No**	**–**	**–**	**No**

As shown in Table 4-1, the Proposed Project would not exceed City significance thresholds and would not require mitigation to comply.

Operational Emissions

The intent of the Proposed Project is to charge during the day when solar energy production is at it is peak on SDGE's electrical grid, store the energy, and then re-supply the grid at night, as needed. Operational air emission sources would include area sources such as landscaping and maintenance activities that include mobile sources that would be generated from traffic associated with monthly maintenance site visits. For purposes of this analysis, it was assumed that the Proposed Project would generate as many as four trips per day. CalEEMod was updated to reflect Project related operational conditions.

Completion of Project construction and start of operations is expected to occur in 2024/2025 for Phase 1, and 2026/2027 for Phase 2. The Project traffic generation was assumed to be as many as four trips per day during a worst-case day. Additionally, the model was run for the winter and summer scenarios to determine maximum daily operational impacts for operation.

The expected daily pollutant generation can be calculated used the product of the average daily miles traveled and the expected emissions inventory calculated by EMFAC2017; CALEEMOD 2020.4.0 performs this calculation. The daily pollutants calculated for summer and winter are shown in Table 4-2 and Table 4-3.

Table 4-2. Expected Summer Daily Pollutant Generation

Category	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	0.000	0.000	0.000	0.000	0.000	0.000
Energy	0.000	0.000	0.000	0.000	0.000	0.000
Mobile	0.017	0.020	0.179	0.000	0.029	0.008
Total (unmitigated)	**0.017**	**0.020**	**0.179**	**0.000**	**0.029**	**0.008**
CityThresholds	**75**	**250**	**550**	**250**	**100**	**55**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Category	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$

Notes:
1) Daily pollutant generation assumes trip distances within CalEEMod
2) The final numbers are all rounded within Excel and are reported as rounded numbers.

Table 4-3. Expected Winter Daily Pollutant Generation

Category	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	0.000	0.000	0.000	0.000	0.000	0.000
Energy	0.000	0.000	0.000	0.000	0.000	0.000
Mobile	0.012	0.014	0.119	0.000	0.029	0.008
Total (unmitigated)	**0.02**	**0.014**	**0.119**	**0.000**	**0.029**	**0.008**
City Thresholds	**75**	**250**	**550**	**250**	**100**	**55**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1) Daily pollutant generation assumes trip distances within CalEEMod
2) The final numbers are all rounded within Excel and are reported as rounded numbers.

As shown in Table 4-2 and Table 4-3, the Proposed Project would not exceed City significance thresholds and would not require mitigation to comply. Based on these calculations, the Proposed Project would result in less than significant air quality impacts.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The Proposed Project would not expose sensitive receptors to substantial pollutant concentrations. The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the Proposed Project, which may expose sensitive receptors to substantial concentrations have been calculated above in Section 4.3 (b) for both construction and operations, which are discussed separately below. The nearest sensitive receptors to the Project site are single-family residences located approximately 1,000 feet to the southeast of the Project site.

Construction-Related Sensitive Receptor Impacts

Construction activities have the potential to expose sensitive receptors to substantial pollutant concentrations of localized criteria pollutant concentrations and from toxic air contaminant emissions created from onsite construction equipment, which are described below.

Local Criteria Pollutant Impacts from Construction

As discussed above, construction of the Proposed Project would not exceed the local ROG, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ thresholds of significance. Furthermore, the nearest sensitive receptors, single-family residences southeast of the Project site, are located approximately 1,000 feet away and Project-related emissions would considerably dissipate before reaching those residences. Therefore, construction of the Proposed Project would create a less than significant construction-related impact to sensitive receptors and no mitigation would be required.

Operations-Related Sensitive Receptor Impacts

Project operations would generate as many as four daily trips and as discussed above, would not exceed the local ROG, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ thresholds of significance. Furthermore, the nearest sensitive receptors, single-family residences southeast of the Project site, are located approximately 1,000 feet away and Project-related emissions would considerably dissipate before reaching those residences. Therefore, operation of the Proposed Project would create a less than significant impact to sensitive receptors and no mitigation would be required.

d) Would the project result in other emissions, such as those leading to odors adversely affecting a substantial number of people?

Less than Significant Impact. The Proposed Project would create temporary objectionable odors resulting from diesel engine exhaust during construction; odors resulting from Project operations are not expected. Individual responses to odors are highly variable and can result in a variety of effects. Generally, the impact of an odor results from a variety of factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the Project site and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, this is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like. The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration. Potential odor impacts have been analyzed separately for construction and operations below.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include emissions from diesel equipment. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the Project site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur, and no mitigation would be required.

Operations-Related Odor Impacts

The Proposed Project would consist of the development of an energy storage facility. The on-going operation of the Proposed Project is not anticipated to include any known sources of odors. Therefore, a less than significant odor impact would occur from operation of the Proposed Project and no mitigation would be required.

4.4 BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
(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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
(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?	☐	☐	☐	☒
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

4.4.1 Impact Analysis

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

Less than Significant Impact with Mitigation Incorporated. The City is located within the boundary of the MHCP for Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista. The City is primarily developed with the larger areas that have potential for habitats to be located in the City's periphery closer to undeveloped areas of the County. The five large areas of habitats are located

in the Northeastern, Eastern, Southern, Southwestern, and Northwestern Habitat Areas of the City which contain the majority of its open spaces (City 2012).

The Project site is located in a developed area of the City with Interstate 15 located immediately southwest of the Project site. The area is zoned as PD-I with an existing electrical generation facility and non-operational ice-rink in the Project site. Vegetation within the area consists of trees lining the parking lot and channel.

The Project site is developed with no areas designated as a habitat for any candidate, sensitive or special status species. According to the MHCP and MSCP Area Map provided in the General Plan Update Final Environmental Impact Report (GPU EIR), the Project site is not located within or adjacent to any designated MHCP/MSCP areas and its classification is designated as Urban/Development. (City 2012). Because the City's urban core consists of urban and developed land, and that these areas do not support sensitive species.

Trees are located along the parking lot areas and line the channel to the south of the Project. The existing trees are potential habitat to nesting birds. While the area is not a designated habitat for candidate, sensitive or special status species, Project disturbances would occur that could result in disturbance to nesting birds. To minimize potential impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA), construction activities should take place outside nesting season (February 1 to August 31) to the greatest extent practicable.

If construction activities must occur during nesting season, the following mitigation measure shall be implemented to address potential impacts to nesting birds. In addition, to the maximum extent practicable, a minimum buffer zone around occupied nests should be determined by a qualified biologist to avoid impacts to the active nest. The buffer should be maintained during physical ground-disturbing activities. Once nesting has ceased, the buffer may be removed.

Because the Project site does not contain any sensitive plant species, lacks any sensitive habitat, and has not been found to house sensitive wildlife species, impacts would be less than significant. While there are no sensitive species that are expected to occur, MBTA applies to bird species native to the U.S. To address potential impacts to nesting birds, mitigation measure **MM-BIO-1** would be implemented and result in impacts to nesting birds to be less than significant.

MM-BIO-1: To minimize potential impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA), construction activities should take place outside nesting season (February 1 to August 31) to the greatest extent practicable. If construction activities must occur during nesting season, the following shall be implemented to address potential impacts to nesting birds: A pre-construction nesting bird survey shall be conducted approximately 3 days prior to ground-disturbing activities by a qualified biologist retained by the Applicant. If nests are found during surveys, they shall be flagged and a 250-foot buffer to a 500-foot buffer (for raptors) shall be fenced around the nests. The buffer area shall be kept in place until the young have fledged and leave the nest. To the maximum extent practicable, a minimum buffer zone around occupied nests should be determined by a qualified biologist to avoid impacts to the active nest. The buffer should be maintained during physical ground-disturbing activities. Once nesting has ceased, the buffer may be removed.

b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

No Impact. Riparian habitats/communities are mainly found in the five habitats of the City. Vegetation classifications and communities are shown in the Vegetation Classes Figure 4.4.2 of the General Plan Update Final EIR. According to the figure, there are various vegetation classifications designated throughout the outer boundaries of the City. The Project site's classification under this figure is Urban/Development with no other vegetation classifications found within or surrounding the Project site. Due to the developed nature of the Project site, no impact would occur.

c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. The Project site is within the developed urban core of the City. The Project site contains existing structures, sidewalks, and paved parking lots. There are no wetlands, marshes, or vernal pools in the Project site and therefore, the Project would not result in hydrological interruption in these areas. According to the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) Surface Waters and Wetlands Mapper, the Project site does not contain any wetlands or surface water (USFWS 2022). However, a riverine habitat is present south of the Project site which is an existing channel. While the Project is located adjacent to a channel, no work is proposed that would result in disruption or modification to the channel. No impact would occur.

d) *Would the project 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?*

No Impact. As noted in the GPU EIR, the Project site is not located within the open space areas of the City that contain habitats for various biological species. The Project site is in a developed area zoned for industrial uses. No areas within the Project site would be a suitable habitat for migratory or native species. No impact would occur.

e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Less than Significant. The Project proposes the construction of an energy storage facility within an existing and developed industrial site. The Project will demolish the existing facilities and construct new structures on the site. Because the Project is located in a developed area of the City, it would not result in the removal of protected biological resources. Trees are located on the Project site; however, these trees are located along the parking lot areas for landscaping purposes. Trees are also lined along the channel which is located south of the Project site. The proposed construction activities would not include the removal of the existing trees. Due to the nature of the Project and site conditions, impacts would be less than significant.

f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The GPU Final EIR calls out specific areas in the City that contains a majority of the protected habitats in the area. It includes a list of focused planning areas where some lands may be

dedicated for open space and habitat conservation. These include Daley Ranch, Rancho San Pasqual, Kit Carson Park, San Pasqual Valley, Lake Wohlford, and Bernardo Mountain. The Project is not located within these habitat and focused planning areas. No work is proposed to affect these designated areas as the Project construction and operation would be limited to the industrial zoned area. No impact would occur.

4.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Chambers Group conducted a cultural resources records search and literature review within the Project site and surrounding study area in October 2022. The purpose of the review was to gather and analyze information needed to assess the potential for impacts to cultural resources within the proposed Project area. In addition, Chambers Group evaluated whether the Project would result in impacts to cultural resources that would warrant additional studies, including a site visit or field survey. The Cultural Resources Records Search and Literature Review Letter Report is provided in Appendix B and the results are discussed below.

4.5.1 Survey

No on-ground survey of the Project site was conducted by a Chambers Group archaeologist or paleontologist. This decision was based on existing conditions at the Project site, being nearly completely covered in hardscape or building footprint, with minimal exposure of on-site sediments. These exposures are primarily limited to three-to-one and two-to-one tapered margins along the Project site perimeter and are generally ensconced in ornamental landscaping. Other Chambers Group staff did attend an on-site meeting whereby several existing condition photographs were taken, including ground surfaces where exposed. Review of these photographs illustrate results typical of engineered surfaces to be used for landscaping and other permeable surface purposes. Sediments appear homogeneous, frequently with inclusions of crushed rock gravel, and appear typical of mixed materials prepared for finish grading prior to project construction.

4.5.2 Literature Review and Background Research

Chambers Group requested a records search from the California Historical Resources Information System (CHRIS) South Coastal Information Center (SCIC) at California State University, San Diego on September 19, 2022. The SCIC returned the records search results on October 3, 2022, providing information on all documented cultural resources and previous archaeological investigations within 0.5-mile radius of the Project site. A 0.5-mile study area was requested to provide additional context to the Project site and

surrounding area and more information on which to base this review. Resources consulted during the records search conducted by the SCIC included the NRHP, California Historical Landmarks (CHL), California Points of Historical Interest (CPHI), Caltrans Historic Highway Bridge Inventory, the California State Historic Resources Inventory, local registries of historic properties, and a review of available Sanborn Fire Insurance maps as well as historic photographs, maps, and aerial imagery. The task also included a search for potential prehistoric and/or historic burials (human remains) evident in previous site records and/or historical maps. In addition, Chambers Group submitted a request to the Native American Heritage Commission (NAHC) for a review of the Sacred Land Files (SLF) for the Project site and surrounding vicinity. Results of the records search and additional research are detailed below and included in Attachment A of Appendix B.

Based on the records search conducted by the SCIC, 20 cultural resource studies have previously been completed within the 0.5-mile records search radius. Table 4-4 provides further details of these 20 studies, of which, four encompass the Project site in some manner. These projects are bolded and italicized in the table below.

Table 4-4. Previous Cultural Resources Studies within the 0.5-Mile Study Area

Report Number	Year	Author	Title	Resources	Within Project Boundary?
SD-00783	1986	Cheever, Dayle, and Dennis Gallegos	Cultural Resource Survey of the La Terraza Project Escondido, California	–	No
SD-04301	1980	Banks, Thomas, and David M. Van Horn	Archaeological Survey Report: The Proposed Escondido Auto Park in the City of Escondido, California	37-000153, 37-000154, 37-000156, 37-001035, 37-001505, 37-005501, 37-005502, 37-005503, 37-005504	No
SD-04909	1985	County of San Diego	Historic Property Survey Report Escondido Transit Center, San Diego County, CA	–	No
SD-08588	***1980***	***City of Escondido***	***Draft Environmental Impact Report for Expansion of Wastewater Treatment Facility***	**–**	***Yes***
SD-08596	***1992***	***Keller Environmental Associates, Inc***	***Appendices-Reclaimed Water Distribution System Project: Draft Environmental Impact Report***	**–**	***Yes***
SD-08729	1989	Mitchell, Patricia	The Oceanside to Escondido Rail Project	–	No

Report Number	Year	Author	Title	Resources	Within Project Boundary?
SD-09546	2001	Guerrero, Monica, Dennis Gallegos, Tracy Stropes, Steve Bouscaren, Susan Bugbee, and Richard Cerreto	Cultural Resource Test Report for Oceanside-Escondido Rail Project Oceanside, California	–	No
SD-09622	2005	Mason, Roger, Evelyn Chandler, and Cary Cotterman	Cultural Resources Record Search and Field Survey Report for a Verizon Telecommunications Facility: Valley Parkway, Escondido, San Diego County, California	–	No
SD-10352	2006	Robbins-Wade, Mary	Lowe's General Plan Amendment - Escondido Case Numbers: ER 2005-40, 2005-02-GPA, 2005-58/PD/CP/CZ, Tract 946 Cultural Resources (AFFINIS Job No. 2089)	37-005210, 37-006726, 37-006727, 37-006728, 37-006729, 37-007785	No
SD-12039	2007	Guerrero, Monica, and Dennis R. Gallegos	Cultural Resources Monitoring Report for the North County Transit District (NCTD) Sprinter Rail Project Oceanside to Escondido, California	37-012095, 37-012096, 37-012097, 37-015576, 37-015595	No
SD-12394	2009	Pierson, Larry J.	A Historical Assessment of 1050 West Washington Avenue, Escondido, San Diego County, California, APN 228-250-17	–	No
SD-12835	2010	Robbins-Wade, Mary	Escondido Ballpark- Cultural Resources Survey	–	No
SD-14328	2013	Wilson, Stacie	Letter Report: ETS 20872 Cultural Resources Monitoring for TL6956 Undergrounding Trench Excavation, City of Escondido, California- IO 200414230	–	No
SD-14394	1983	Donald A. Cotton Associates	Survey Report on Historic/ Cultural Resources City of Escondido	–	No
SD-15266	2015	David Brunzell	Cultural Resources Assessment of the Westside Park Project, Escondido, San Diego County, California (BCR Consulting Project No. TRF1434)	–	No

Report Number	Year	Author	Title	Resources	Within Project Boundary?
SD-15868	2014	Wills, Carrie D., and Sarah A. Williams	Cultural Resource Records Search and Site Visit Results for AT&T Mobility, LLC Candidate SD1870 (Escondido Transit Center), 520 West Gannon Place, Escondido, San Diego County, California	–	No
SD-16896	2016	Smith, Brian F., and Kristen R. Reinicke	Historic Structure Assessment for 852 Metcalf Street Escondido, California APN 228-220-22	–	No
SD-17233	2017	Brunzell, David	San Diego 129 Project, San Diego County, California (BCR Consulting Project No. SYN1622)	–	No
SD-17339	***2015***	***Robbins-Wade, Mary, and Nicole Falvey***	***Recycled Water Easterly Main and Tanks Project and Brine Line, Broadway to Hale Avenue Resource Recovery Facility (HARRF) Project - Cultural Resources Study***	**–**	***Yes***
SD-18976	***2020***	***Cooley, Theodore G., and Mary Robbins-Wade***	***City of Escondido Brine Line Project - Cultural Resources Monitoring***	**–**	***Yes***

Based upon the records search conducted by the SCIC, one previously recorded cultural resource was recorded within the 0.5-mile records search radius. The resource, an isolated mano fragment and lithic flake, was not located within the Project area. As a result of the records search review and archival research, no previously recorded resources or any other listed or potentially significant properties are located within the Project site. However, 47 properties do occur outside the Project site but within the 0.5-mile study area, and are listed on the BERD inventory, and reproduced in Table 3 of Appendix B.

4.5.3 Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. An archival records search through the SCIC of the CHRIS database and a background study of the Project site were conducted as part of the study. In addition, Chambers Group submitted a search request of the NAHC SLF to determine the presence or absence of data regarding any known sacred lands or similar resources previously reported within the Project area or surrounding vicinity. The SCIC records search identified four cultural resources reports that encompassed the Project site in some fashion and identified no cultural resources within the Project site. None of the reports appear to have required access to the Project site as part of a

visual inspection survey, or similar program. The NAHC SLF search results have not been received at as of the date of this Initial Study. It is noted, however, a recent NAHC SLF search request for a project located approximately 350 meters north-northeast resulted in positive findings within that search radius (Helix 2020). The location and nature of these results have not been disclosed.

Based on the results of the records search review and background research, there is potential to encounter intact buried native formations (Appendix B). The depths of these potential intact native formations remain unknown. In addition to intact native formations there is also the potential to encounter buried archaeological and paleontological resources. Similarly, consultation with Native American groups may indicate the presence of additional significant resources. Because data at present are insufficient to declare with certainty that cultural and paleontological resources will not be encountered during project construction, the following Mitigation Measures (MMs) shall be incorporated to reduce potential impacts to a less-than-significant level.

If additional information is obtained with more specific details regarding the previous or current subsurface conditions within the Project site, that information will be incorporated in a Cultural Resources Monitoring Program (CRMP). The relevant additional information may be included through obtaining and reviewing documentation with more detailed evidence regarding the past development and associated ground disturbance at the site or through additional studies performed related to the Project, such as geotechnical analysis related to advanced design. The CRMP, particularly if relevant additional information is obtained, will allow for more tailored and focused monitoring and mitigation programs to be prepared, in concert with the City and participating tribes.

MM-CUL-1 If requested by one or more participating tribes, the applicant shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the Project Location (TCA Tribe) prior to issuance of a grading permit to be submitted to the City. The purposes of the agreement are (1) to provide the applicant with clear expectations regarding tribal cultural resources; and (2) to formalize protocols and procedures between the City and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains; funerary objects; cultural and religious landscapes; ceremonial items; traditional gathering areas; and cultural items located and/or discovered through a monitoring program in conjunction with the construction of the Proposed Project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.

MM-CUL-2 Prior to issuance of a grading permit, the applicantshall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior, 2008) to prepare the CRMP in coordination with participating tribe(s). The CRMP will include any additional information that can be utilized to determine the appropriate monitoring program. The qualified archeologist and Native American monitors associated with a TCA Tribe will implement the monitoring program, as described in the CRMP. Because the Project is located within shared territory of the Luiseño and Kumeyaay people, Native American monitors representing the interest and values of both the Luiseño and Kumeyaay people shall be retained for the project. The archaeologist shall be responsible for coordinating with the Native American monitor. This verification shall be presented to the City in a letter from the qualified archaeologist that confirms that Native American monitors

representing both Luiseño and Kumeyaay TCA Tribes have been retained. The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.

MM-CUL-3 The qualified archaeologist and, if requested by the participating tribe(s), a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.

MM-CUL-4 As required by the CRMP, the qualified archaeologist and the Native American monitor shall be on site during the initial grubbing, site grading, excavation or disturbance of the ground surface . The CRMP shall include protocols for monitoring and, if available, shall include any additional information and related monitoring procedures for specific areas of the Project site that have been previously disturbed. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.

MM-CUL-5 In the event that previously unidentified cultural resources that qualify as historical, unique archaeological, and/or tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

MM-CUL-6 If a potentially significant historical, unique archaeological, and/or tribal cultural resource is discovered, the qualified archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor, shall determine the significance of the discovered resource. Recommendations for the resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.

MM-CUL-7 The avoidance and/or preservation of significant cultural resources that qualify as historical, unique archaeological, and/or tribal cultural resources must first be considered and evaluated as required by CEQA. Where any significant resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.

MM-CUL-8 As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on-site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

MM-CUL-9 If the qualified archaeologist elects to collect any archaeological materials that qualify as tribal cultural resources, the Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the qualified archaeologist does not collect the archaeological materials that qualify as tribal cultural resources that are unearthed during the ground disturbing activities, the Native American monitor, may at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. The project archaeologist shall document evidence that all cultural materials have been curated and/or repatriated as follows:

1) It is the preference of the City that all tribal cultural resources be repatriated to the TCA Tribe as such preference would be the most culturally sensitive, appropriate, and dignified. Therefore, any tribal cultural resources collected by the qualified archaeologist shall be provided to the TCA Tribe. Evidence that all cultural materials collected have been repatriated shall be in the form of a letter from the TCA Tribe to whom the tribal cultural resources have been repatriated identifying that the archaeological materials have been received.

OR

2) Any tribal cultural resources collected by the qualified archaeologist shall be curated with its associated records at a San Diego curation facility or a culturally-affiliated Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/ researchers for further study. The collection and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence that all cultural materials collected have been curated shall be in the form of a letter form the curation facility stating the prehistoric archaeological materials have been received and that all fees have been paid.

MM-CUL-10 Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusion of the archaeological monitoring program and any data recovery program on the project site shall be submitted by the qualified archaeologist to the City. The Native American monitor shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.

4.6 ENERGY

6.	ENERGY Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

4.6.1 Impact Analysis

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

Less Than Significant Impact. The Project, which comprises a lithium-ion BESS facility, is intended to provide important electrical reliability services to the local area. During construction, the Project would require the temporary use of construction equipment fueled with gasoline and diesel. The Project does not include any permanent components that would increase demand for existing sources of energy, with the exception of gasoline usage for weekly maintenance visits. By building the Project, a clean, reliable resource would be gained to help integrate renewable energy sources, reduce dependence on gas-fired generation, and reduce GHG and criteria air pollutant emissions. Therefore, less than significant impacts to energy resources would result.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The Project, which comprises a lithium-ion BESS facility, would be part of a sustainable solution to enable increasing amounts of renewable energy-generating sources to be accessed. Renewable energy is one of the focuses of the City's Climate Action Plan; therefore, the Project would be in alignment with the City's energy goals (City 2021a). No conflicts with renewable energy or energy efficiency plans would occur; therefore, less than significant energy-related impacts would result from the Project.

4.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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.	☐	☐	☒	☐
	ii) Strong seismic ground shaking?	☐	☐	☒	☐
	iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv) Landslides?	☐	☐	☒	☐
(b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
(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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

4.7.1 Impact Analysis

a) i) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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.

Less than Significant Impact. The City is located in the Peninsular Range Region of Western San Diego County, along the Pacific Rim in the Southern California. The region contains active faults, steep topography, and other various geological characteristics. This region is characterized by rolling to hilly uplands with narrow winding valleys (City 2012). The local seismic setting of the City shows three active faults which include the San Jacinto Fault, Elsinore Fault, and Rose Canyon Fault which has the potential to result in seismic ground shaking within the City. The nearest active fault to the Project site in the Elsinore Fault located approximately 20 miles directly to the northeast.

The San Diego region has 34 soil associations with various susceptibility to erosive forces, depending on the individual characteristics. According to the GPU Final EIR, the soils in the area consist of well-drained, medium-to coarse-grained, often rocky sandy loams. Most of the soils within the area have limited erosion potential. The soil at the Project site consists of Visalia sandy loam. Sandy loams are soil materials that contain 20 percent clay or less (City 2012).

The Project site is located in Southern California is which a seismically active area. As such, many areas in Southern California could be subject to some seismic activity. The Project site is approximately 20 miles, direct distance, southwest of the nearest active fault which is the Elsinore Fault. The Project site is not located in the immediate vicinity of an active fault. No active faults have been mapped within or trending towards the Project site and it is not within a designated Alquist-Priolo Earthquake Fault Zone. Impacts would be less than significant.

ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less than Significant Impact. Ground shaking is a potential hazard resulting from earthquakes along major active or potentially active faults. While the region is exposed to seismic events, the Project site does not appear to have experienced more seismicity in comparison to other areas in Southern California. The Elsinore Fault Zone has a 12-mile-wide area occupied by four major fault zones that includes a state-designated Earthquake Fault Rupture Zone (City 2012). The Project site is not located within this zone.

Because of the Project site's location, it is not expected that it would cause substantial adverse effects involving strong seismic ground shaking. Furthermore, the Project would not involve any excavation or ground disturbing activities that could exacerbate any nearby fault zones. The Seismic Design Categories of the California Building Code (CBC) are based on occupancy type and severity of the ground motion and consists of six design categories (A through F); A having the least seismic potential and F having the highest seismic potential. Both San Diego County and the City are within the seismic design categories of E and F. The Project will be constructed to comply with the CBC and will include the required standards to protect life safety and prevent collapse. Impacts would be less than significant.

iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less than Significant Impact. Secondary seismic hazards for the region include liquefaction, slope instability, earthquake-induced seiches, tsunami flooding and slope instability. Liquefaction occurs when loosely packed, water saturated sediments that are near or at ground surface lose their strength due to ground shaking, which in turn, causes the sediment to act like a fluid. For liquefaction to occur, the area has to have loose, clean granular soils, be shallow groundwater, and have strong, long durations of ground shaking.

Approximately 4,082 acres of soil within the City has potential for liquefaction to occur. These areas are primarily located along natural waterways such as the Escondido Creek and near Lake Wohlford. The Liquefaction Hazard Area figure in the GPU EIR depicts areas with the potential for liquefaction to occur. The Project site is located within this area given its proximity to the existing channel.

The Project consists of the demolition of existing structures and construction of a battery energy facility. The Project will occur within an already disturbed and developed site that currently has existing buildings, parking lots, walkways, and roadways. The Project will include site preparation and grading which would disturb the soils under the pavement. However, foundations/supports will be constructed for the new structures and the Project would be built in compliance with CBC standards. Furthermore, seismically induced rupture at the Project site is not likely to occur due to the lack of active faults in the area. Therefore, because the Project site is in a developed area with no active faults in the immediate vicinity, and in compliance with the CBC, impact would be less than significant.

iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Less than Significant Impact. Landslides occur when there is a disturbance in the stability of a sloped area which can be initiated by rainfall, snowmelt, change in water levels, erosion, groundwater changes, earthquakes, volcanic activity, disturbance through human activities, or a combination of these factors. Seismically induced landslides and other similar slope failures are a common occurrence during or after earthquakes, particularly within the region.

According to the Landslide Hazard Areas of the GPU Final EIR, the Project site is not located in areas that have soils subject to potential landslides (City 2012). The Project site is relatively flat and developed. The Project would not result in ground disturbances that would create new slopes to the area that could result in soil instability creating landslides. Furthermore, the Project would not involve any disturbances to the existing channel that would create a risk for landslides such as loose soil and steep slopes. Ground disturbances would be limited to the Project site. Because the Project site has not been found to be an area with potential landslides, impacts would be less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Topsoil is the top layer of soil that usually holds high concentrations of organic matter, which are typically found in fields and other vegetated areas. Loss of topsoil or any type of soil erosion occurs when dirt is left exposed to physical factors such as strong winds, rain, and flowing water. The presence of topsoil is typically associated with supporting animal or plant life and therefore, any disturbance of toil soil could indicate a disruption of a food chain or local ecosystem.

A location may have potential for topsoil for areas that are undeveloped. The Project site is developed and covered by buildings, parking lots, walkways, and roadways with minimal areas of landscaping. The area is zoned for industrial uses and therefore does not contain, nor is it permitted for any agricultural type uses that would require topsoil or other materials that would be capable of supporting a local ecosystem. Therefore, impacts involving loss of topsoil would be less than significant.

The Project includes site preparation and grading for the demolition of existing structures and construction of a battery storage facility. Breaking ground during construction would expose underlying soils in the area that could be subjected to wind and rain thereby disturbing the existing dirt/soils. As part of AQMD's Rule 403 addressing fugitive dust, implementation of dust control measures would minimize potential for soil erosion. Typical construction methods implemented such as use of barrier covers and other best management practices (BMPs) for erosion control are required

under the National Pollution Discharge Elimination System (NPDES) regulations pursuant to the federal Clean Water Act (City 2012). In addition, the Project under these regulations would require preparing a Stormwater Pollution Prevention Plan (SWPPP) to be prepared to protect water quality from erosion and runoff. Therefore, impacts due to soil erosion would be less than significant.

c) *Would the project 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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

Less than Significant Impact. Lateral spreading is the lateral movement, usually soils, which are caused by earthquake-induced liquefaction. The shaking reduces the stiffness and strength of the soil thereby causing ground movement ranging from a few centimeters to several meters. Lateral spreading often occurs along shorelines and riverbanks where there are loose, saturated sandy soils that are at shallow depths.

Subsidence on land is the downward shift (gradual or sudden) of the land surface that can be caused by natural or human-induced activities through the moving of earth materials such as soils. Main causes of land subsidence include but are not limited to drainage of organic soils, underground mining, sinkholes, compaction, or removal of underground water.

According to the Multi-jurisdictional Hazard Mitigation Plan, the entire County of San Diego, including the City, has had no known cases of lateral spreading resulting damage to property or structures (City 2012). The Project site is not located along any riverbank or waterbody. The Project site is located north of an existing channel. The channel is a cement-lined at a lower elevation and its waters are not anticipated to intrude into the soils of the Project site. The Project construction and operational activities will not include removal of groundwater not would any grading or excavation occur along the sloped areas along the channel. Therefore, lateral spreading and subsidence is unlikely to occur at the Project site due to the lack of liquefaction potential, lack of groundwater, and lack of sloped areas. Therefore, impacts would be less than significant.

d) *Would the project 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?*

Less than Significant Impact. Expansive soils are soils, clay, and other fine viscous particles that are prone to expansion or shrinkage due to a direct variation in water content/volume. Swelling would occur when there is a large amount of water present and shrink when water evaporates. The continued cycle of swelling and shrinking causes soil to move which can cause structures built on expansive soil to sink or rise unevenly, thereby requiring foundation repairs.

Expansive soils in the City are mostly limited in the peripheries of the City. Soils that are considered to be expansive in the City include Las Posas stony fine sandy loam, Las Posas fine sandy loam, Auld Clay, and Huerhuero loam. The majority of land uses within the General Plan area that have expansive soils would be low density. The Project site is located in a developed industrial area in the City. There are no waterbodies in the area that could result in the continuous expansion or shrinkage of soils. While the Project is located north of an existing channel, the channel is concrete-lined. and it is not expected for water to encroach into the Project site. Because the Project is not located on expansive soil and new facilities will be constructed in accordance with the CBC, impacts would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project site currently has electrical, telecommunications, water, sanitary sewer, storm sewer, and natural gas services. The Project will not require new installations of any septic tanks or waste water disposal systems. No impact would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. On September 19, 2022, Chambers Group requested a paleontological records search from the San Diego Natural History Museum (SDNHM). This information was requested with the intent to provide further context related to the paleontological sensitivity of the area based on known fossil locations identified within the Project site or 0.5-mile study area. The paleontological records provide insight into what associated geological formations are more likely to contain fossils as well as the associated depths and placement of the known fossil locals relative to the geological formations in the area. On September 30, 2022, Chambers Group received the results of the records search. The results show that no known fossil localities lay directly within the proposed Project site. Based on the records search results, the paleontological sensitivity is considered by the SDNHM to be low for upper surface sediments dating to the late Pleistocene to Holocene period and increasing to a moderate status within middle to late Pleistocene deposits that underlay the Project site. No fossil localities are expected to be identified within the basement granitic bedrock underlying the region (Appendix B).

Based on the results of the records search review and background research, there the potential to encounter buried paleontological resources. Because data at present are insufficient to declare with certainty that paleontological resources will not be encountered during project construction, the following mitigation measures shall be considered and implemented to reduce potential impacts to a to less-than-significant level. If additional information is obtained with more specific details regarding the previous or current subsurface conditions within the Project site, that information will be incorporated in a Paleontological Mitigation Plan (PMP). The relevant additional information may be included through obtaining and reviewing documentation with more detailed evidence regarding the past development and associated ground disturbance at the site or through additional studies performed related to the Project, such as geotechnical analysis related to advanced design. The PMP, particularly if relevant additional information is obtained, will allow for more tailored and focused monitoring and mitigation programs to be prepared

MM-GEO-01 Prior to issuance of a grading permit, the applicant shall retain the services of a qualified paleontologist to remain on-call for the duration of the proposed ground disturbing construction activity. The paleontologist selected must be approved by the appropriate City/Lead Agency representative. The qualified paleontologist may also be a qualified archaeologist. Upon approval or request by the City, a paleontological mitigation plan (PMP) outlining procedures and protocols for paleontological monitoring and data recovery shall be prepared for the Proposed Project and submitted to the City for review and approval. The development and implementation of the PMP shall include any additional information that can be utilized to determine the appropriate monitoring program, consultations with the applicant's engineering geologist, as well as a requirement that the curation of all specimens recovered under any scenario shall be through an appropriate repository agreed upon by the City. All

specimens become the property of the City unless the City chooses otherwise. If the City accepts ownership, the curation location may be revised. The PMP shall include developing a multilevel ranking system, or Potential Fossil Yield Classification (PFYC), as a tool to demonstrate the potential yield of fossils within a given stratigraphic unit. The PMP shall outline the monitoring and salvage protocols to address paleontological resources encountered during ground disturbing activities. As well as the appropriate recording, collection, and processing protocols to appropriately address any resources discovered. The cost of data recovery is limited to the discovery of a reasonable sample of available material. The interpretation of reasonableness rests with the City, in consultation with the qualified paleontologist.

MM-GEO-02 At the completion of all ground-disturbing activities, the qualified paleontologist shall prepare a final paleontological mitigation report summarizing all monitoring efforts and observations, as performed in line with the PMP, and all paleontological resources encountered, if any. As well as providing follow-up reports of any specific discovery, if necessary. If no paleontological resources are identified during monitoring, the final reporting shall be addressed within the archaeological monitoring and/or evaluation report. A standalone paleontological mitigation report is only required if paleontological resources are encountered during monitoring.

With implementation of MMs PAL-01 and PAL-2, impacts to unique paleontological resources or sites or unique geologic features would be reduced to a less-than-significant level.

4.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
(b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

A Greenhouse Gas (GHG) Analysis was conducted by Ldn Consulting in October 2022. GHGs analyzed in this study include Carbon Dioxide (CO_2), Methane (CH_4), and Nitrous Oxide (N_2O) because these are the most prevalent GHGs generated from projects such as the Proposed Project. To simplify GHG calculations, both CH_4 and N_2O are converted to equivalent amounts of CO_2 and are identified as *carbon dioxide equivalent* (CO_2e). CO_2e is calculated by multiplying the calculated levels of CH_4 and N_2O by a Global Warming Potential (GWP). The Intergovernmental Panel on Climate Change (IPCC) as source data for GWP factors for both CH_4 and N_2O using the 100-year periods of 25, 298 respectively (IPCC 2007).

4.8.1 Impact Analysis

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

GHGs related to construction and daily operations were calculated using the latest CalEEMod 2020.4.0 GHG model. The construction module in CalEEMod is used to calculate the emissions associated with the construction of the project. The CalEEMod input/output model is shown on Attachment A in Appendix A. The model was manually updated to include 4 trips per day to the site to provide conservative GHG estimates. Results from this analysis have been incorporated below.

Construction Emissions

Project construction dates were estimated based on a construction kickoff starting in the middle of 2023. The project would be constructed in three phases and would start with demolition, which is expected to last 6 months. Phase 1 would follow and would be expected to take as long as 15 months to complete. Phase 2 would commence at a later date that has not yet been established. For purposes of this analysis, it is assumed that construction for phase 2 would be one year later. The project will import material, which is assumed to be as much as 30,000 CY of soil and as much as 5,000 CY of surface material (such as asphalt or crushed stone with roughly ½ of the material necessary for each phase). Phase 2 may have additional offsite construction in the immediate vicinity of the Project; therefore, additional equipment was assumed as part of this phase.

Based on modeling conducted, construction of the Proposed Project would generate approximately 1,234.16 $MTCO_2e$ over the construction life of the Project (Appendix A). Given the fact that the total emissions would ultimately contribute to cumulative levels, it is acceptable to average the total construction emission over the life of the Project, which is assumed to be 30 years. Given this, the project would add approximately 141.14 $MTCO_2e$ per year. A summary of the construction emissions is shown in Table 4-5.

Table 4-5. Annual Construction Emissions in $MTCO_2e$

Year	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_20	$MTCO_2e$
2023	0.00	258.60	258.60	0.08	0.00	261.14
2024	0.00	383.91	383.91	0.07	0.01	389.86
2025	0.00	59.42	59.42	0.01	0.00	59.94
2026	0.00	401.89	401.89	0.07	0.01	407.70
2027	0.00	114.58	114.58	0.02	0.00	115.52
					Total	**1,234.16**
					Amortized 30 Year annual Emissions	**141.14**

Notes: Expected Construction emissions are based upon CalEEMod modeling assumptions

Operational Emissions

Operational-related emissions would result primarily from vehicle exhaust emissions associated with the maintenance crews traveling to and from the site. However, the larger contribution to GHGs is

related to amortized construction emissions. The combined emissions from both operations and construction are summarized in Table 4-6.

Table 4-6. Operational Emissions in $MTCO_2e$

Category	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_20	$MTCO_2e$
Area	0.00	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.00	3.16	3.16	0.00	0.00	3.20
Waste	0.00	0.00	0.00	0.00	0.00	0.0
Water	0.00	0.00	0.00	0.00	0.00	0.00
					Subtotal (MT/year)	**3.21**
					Amortized Construction Emissions (Table 4-5)	**41.14**
					Total Construction and Operations (MT/Year)	**44.35**

Notes: Data is presented in decimal format to two significant digits and may have minor rounding errors.

The City of Escondido has a CAP Checklist screening level suggesting that projects that emit less than 500 MTCO2e would have a less than significant impact on the environment. As shown in Table 4-6, the Proposed Project would create 44.35 MTCO2e per year when averaged over a 30-year period, which would be less than the City's screening threshold. Therefore, the Proposed Project would result in less than significant impacts related to GHG emissions.

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

Less than Significant Impact. The City of Escondido developed an update to the 2013 Climate Action Plan (CAP; City 2021a), which outlines strategies and measures that the City will undertake to achieve its proportional share of State GHG emissions reduction targets. The CAP's strategies and measures are designed to reduce GHG emissions for build-out under the General Plan. The CAP does so by (1) calculating a baseline GHG emissions level as of 2012; (2) estimating future 2030 and 2035 emissions under a business-as-usual standard; and (3) implementing state mandated GHG reduction targets. Measures to reduce GHG emissions for projects with land use consistent with the City's General Plan are found in the CAP.

The City has also developed a Climate Action Plan Consistency Review Checklist (CAP Consistency Checklist), in conjunction with the CAP, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. This memorandum summarizes the methodology and application of a GHG screening threshold (set at 500 metric tons carbon dioxide equivalent [$MTCO_2e$] per year) for new development projects in order to determine if a project would need to demonstrate consistency with the CAP through the CAP Consistency Checklist. The memorandum also describes application of a numerical GHG threshold (set at 2.0 MTCO2e per service population (SP) per year) for use as a supplemental method for demonstrating consistency with the CAP.

A project's adherence to the City's General Plan (City 2012) can be determined through demonstrating consistency with General Plan assumptions and policies. If a project would generate GHG emissions

consistent with the maximum allowable buildout as defined by the General Plan, the Project would be consistent with the estimated GHG emissions for that site. The City's General Plan adopts the CAP's goals and policies that incorporates environmental responsibility into the City's daily management of growth and development, education, energy and water use, air quality, transportation, waste reduction, economic development, open space, and natural habitats. The Project would generate 44.35 $MTCO_2e$ per year when averaged over a 30-year period, which is well below the annual 500 $MTCO_2e$ threshold of significance established in the CAP; therefore, the Project is consistent with the City's General Plan and CAP.

The Proposed Project would not conflict with the City's 2021 CAP, General Plan or any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions; therefore, impacts would be less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
(e)	For a project located within an airport land use plan or, where such a plan had not been adopted, within 2 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?	☐	☐	☒	☐
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

4.9.1 Impact Analysis

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact. The California Environmental Project Agency (CalEPA) oversees California's Unified Program, which protects Californians from hazardous waste and hazardous materials by ensuring local regulatory agencies consistently apply statewide standards when they issue permits, conduct inspections, and engage in enforcement activities.

Construction of the Proposed Project would result in the generation, transport and use of various waste materials that would require recycling and/or disposal. Some of the waste generate could be classified as hazardous wastes/hazardous materials. Hazardous materials typically consist of chemicals that may be categorized as toxic, corrosive, flammable, reactive, an irritant, or strong sensitizer. During construction, the Proposed Project will use potentially hazardous materials from petroleum-based fuels, lubricants, cleaning products and other similar materials. The quantities of the used chemicals that will be present at the Project site would be limited and temporary.

Project operations will mainly be operated remotely with no permanent on-site personnel. Battery storage facilities typically emit gasses such as carbon monoxide, carbon dioxide, hydrogen, methane, ethane, and other hydrocarbons. Other emission types would be based on the chemistry of the batteries being used. Two to four staff members will visit the site weekly and as needed for maintenance and monitoring of the Project. Maintenance may include use of cleaning equipment.

According to the City's GPU Final EIR, any business within the area that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a Hazardous Materials Business Plan (HMBP) that is submitted to County Department of Environmental Health (DEH) for approval. HMBPs intend to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The applicable HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs. A HMBP includes three sections: 1) an inventory of hazardous materials, including a site map, which details their location; 2) an emergency response plan; and 3) an employee training program. HMBPs aid employers and employees in managing emergencies at a given facility. They also prepare emergency response personnel to handle a wide range of emergencies that might occur at the facility.

The Hazardous Materials Division of DEH conducts routine inspections at businesses required to submit HMBPs. The purpose of these inspections is to: 1) ensure compliance with existing laws and regulations concerning HMBP requirements; 2) identify existing safety hazards that could cause or contribute to an accidental spill or release; and 3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials. After initial submission of an HMBP, the business must review and recertify the HMBP every year.

The Project will handle, store, and dispose of materials used during construction and operation in compliance with the manufacturer's standards for storage and spill procedures, and with existing regulations such as the California Health and Safety Code, Hazardous Materials Transportation Act, and Resource Conservation and Recovery Act. The Project will not have any effects regarding hazards and hazardous materials with the preparation and approval of a HMBP prior to building permit issuance. Impacts would be less than significant.

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

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant Impact. The Project site is located at 555 North Tulip Street. The Project location is not located within a Hazardous Waste and Substances Site List (Cortese) (DTSC 2022). According to the Department of Toxic Substances (DTSC) Envirostor database, there are two cases associated with the address, one as a leaking underground storage tank (LUST) cleanup site, and one as a cleanup program site. The identified potential contaminants of concern included alcohols, waste oil, and motor and hydraulic lubricating fluids. As of 1996, both cases have been deemed completed (State Water Resources Control Board 2022).

During construction, the Project would result in construction emissions which would be temporary in nature. Dust suppression methods would be implemented to control particulate spread. In addition, additional on-site construction measures including spill control, erosion control, and other BMPs in the SWPPP would manage accidental release of materials into the environment.

Potential hazards during operations, which would be mainly remote, are thermal runaway (uncontrollable self-heating of a battery cell), off gassing (gases released to an explosive limit with an ignition source), and stranded energy (no safe method of discharging stored energy). Battery failures that could create these hazards include thermal abuse, electrical abuse, mechanical abuse, internal faults, and other environmental conditions such as floods, debris, and rodents.

The Project would include various safety features both for the facility and the BESS enclosures. The enclosures will be equipped with integrated operational management systems, fire and safety systems (HVAC systems, ventilation, gas, heat and smoke detection and alarms, and fire suppression systems) all designed, constructed, and operated pursuant to the version of the California Fire Code in effect at the time of building permit issuance. The modules within each enclosure are accessed for maintenance from the outside via cabinet doors. In addition, while the majority of the operations would occur remotely, the Project site would be visited for maintenance and monitoring.

Therefore, implementation of the construction BMPs, HMBP, and with the design and operations of the Project to comply with hazardous materials handling, the Project would result in less than significant impacts.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. The nearest school to the Project site is Learn4Life Innovation High School which is approximately 2,000 feet directly to the south west of the Project site, or approximately 0.5-mile driving distance. Emissions would occur during short-term construction from the use of construction equipment. These emissions would be primarily composed of particulates and criteria air pollutants that do not pose a significant health risk. During long-term operations, implementation and compliance of the HMBP and use of the on-site security and safety systems would address potential emissions and hazards to public health and safety. Therefore, impacts would be less than significant.

e) For a project located within an airport land use plan or, where such a plan had not been adopted, within 2 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?

No Impact. McClellan-Palomar Airport is located approximately 12 miles driving distance to the west of the Project site. The nearest international airport is San Diego International Airport, which is located approximately 33 miles driving distance to the south of the Project site. Blackington Airport Property is a private airport located approximately 15 miles driving distance to the north of the Project site. Construction and operations of the Project would not be located within an airport land use plan, nor would it involve any modification of an airport land use plan. No impact would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The City maintains an Emergency Action Plan for City employees, while the City Emergency Response Team (CERT) program is a joint effort between the Escondido Fire Department and the residents of the City. CERT training prepares residents for natural disasters and acts of terrorism. County wide, emergency response and evacuation plans include the San Diego County Multi—Jurisdictional Hazard Mitigation Plan and Operational Area.

The Project is located within the Lake Wohlford Dam Failure Inundation Area. The City's Public Works Department maintains the Lake Wohlford Dam Emergency Action Plan. The plan includes information regarding addressing the physical situation, evacuation routes, jurisdictions, event responses staging areas, command posts and shelter facilities (City 2012).

The Project would be confined to the boundaries of the Project site and would not interfere or require changes to any existing evacuation and emergency response plans. In the event temporary lane closures are required for safe delivery of materials during construction or operation, the required permits will be obtained, and the activities conducted such that there is no interference with emergency operations. On a long-term operational basis, the Project is not anticipated to generate traffic capable of interfering with emergency operations. Impacts would be less than significant.

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

Less than Significant Impact. The California Department of Forestry and Fire Protection's Fire and Resource Assessment Program (FRAP) provides a Fire Hazards Severity Zone Viewer (FHSZ) to provide a visual reference to locate fire hazards areas in California. The maps were developed utilizing science and field-tested models that assigns a hazard score based on factors that influence fire likelihood and behavior. Factors include but are not limited to fire history, existing and potential fuel (natural vegetation), predicted flame length, embers, terrain, and typical fire weather in the area (CAL Fire 2022).

Portions of the City support various natural habitats that include grasslands, sage scrub and chaparral. These areas are known as wildlands and therefore has potential to be a resource for wildland fires (City 2012). The Project site is not located within a FHSZ under the CAL FIRE maps. The Project site is designated to be within a moderate fire hazard areas according to the Wildfire Risk figure in the GPU Final EIR (City 2012).

The Project site is located within an urbanized area and has been disturbed with the presence of existing infrastructure. There is limited vegetation onsite and its proximity to the BESS structures would not create a fire hazard. In addition, the safety features and design of the Project would be implemented to address any potential fire hazards. Impact would be less than significant.

4.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	☐	☐	☒	☐
	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	☐	☐	☒	☐
	iv) Impede or redirect flood flows?	☐	☐	☒	☐
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

4.10.1 Impact Analysis

a) Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. Impacts related to water quality would be categorized under short-term construction related impacts and long-term operational impacts. Construction related activities have the potential to degrade surface and groundwater quality by exposing soils to surface runoff from debris and other materials, including runoff from various construction equipment. Pollutants of concern during typical construction activities include sediments, dry and wet solid wastes, petroleum products, solvents, cleaning agents and other similar chemicals. During ground disturbing activities, excavated soil would be exposed thereby creating a potential for soil erosion. During a storm event or water spill, these pollutants and soils could be spilled, leaked, or transported as runoff into drainages or downstream waters, and potentially into receiving waters.

The Project site is located within the Carlsbad Watershed. It is currently developed and mostly covered by buildings, parking lots, roadways, and sidewalks with minimal landscaping. The construction phase of the Project would result in onsite grading that would remove the parking lot asphalt and expose the soil/dirt underneath. The ground disturbances would expose the Project site to particulates, debris and other chemicals typically used during construction. The San Diego Regional Water Quality Control Board (RWQCB) oversees permits in the City. The Project applicant/contractor shall obtain the necessary coverage under the General Construction Permit prior to commencing construction activities. The Project will implement a SWPPP in addition to erosion and grading plan to implement construction and post-construction BMPs to ensure the Project does not violate water quality standards or waste discharge requirements. Typical construction BMPs include but are not limited to watering soil, soil cover of inactive areas, gravel bags, and fiber rolls.

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

Less than Significant Impact. The Project site would not result in the substantial decrease in groundwater supplies because the area is currently paved. The Project site is developed with existing buildings, parking lots, roadways, and sidewalk. Minimal landscape is on the Project site along the parking lot and south along the existing channel. The Project site has existing utilities including water, sanitary sewer, and storm sewer. This would provide the site existing resources for construction and operational water uses. Operations of the Project would occur remotely with weekly visits by staff for monitoring and maintenance. Therefore, the Project water needs would be mainly from irrigation and maintenance needs. In addition, The Project will include installation of drainage and retention basins to handle flows created on site once construction is completed. Impacts would be less than significant.

c) i) *Would the project 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 surfaces, in a manner which would result in substantial erosion or siltation on- or off-site;*

ii) *Would the project 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 surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*

iii) *Would the project 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 surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or*

iv) *Would the project 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 surfaces, in a manner which would impede or redirect flood flows?*

Less than Significant Impact. Drainage patterns are typically formed by the streams, rivers, lakes, or other bodies of water. Overtime, the system is formed via a network of channels and tributaries that are determined the type of geologic features of a particular landscape. The Project site has no natural drainage courses, rivers, or streams as it is fully developed and paved, outside of the minimal landscaping. According to the Federal Emergency Management Agency (FEMA) flood

maps, the Project site is located in Zone X (Other Flood Areas) which are areas with a 0.2% annual chance flood which indicates a moderate flood hazard area (FEMA 2012). The City's GPU Final EIR shows that Project site to be located in a 500-Year Flood Plain (City 2012).

The proposed construction would involve the demolition of the existing facilities and new construction of an energy facility which would not result in a significant increase of impervious surfaces than what is already present. Any alteration of drainage patterns has been previously done during the initial construction of the Project site. The construction activities have potential to degrade water quality through exposure of surface runoff to exposed soils, dust, and other site debris. However, as discussed, the Project would implement erosion control and grading plans, in addition to BMPs outlined in the SWPPP to address site erosion and runoff during construction and operations as required by the San Diego RWQCB. Therefore, the Project, due to the site conditions and proposed construction, would not substantially alter the existing drainage, result in a significant increase in erosion or surface runoff or exceed stormwater drainage capacities. The Project would not involve any alteration of an existing stream, river, or the existing channel that could result in impacting or redirecting flood flows. Impacts would be less than significant.

d) *Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

Less than Significant Impact. Tsunamis are high sea waves typically caused by earthquakes and underwater landslides. Seiche occurs in bodies of water (semi or full-enclosed) and are caused by strong winds or rapid changes in the atmosphere that pushes water from one end to another and typically acts as a standing wave/oscillating body of water. Floods are an overflow of large bodies of water beyond its normal capacity.

The Project site is not in a coastal area nor is it located nearby any rivers, streams, or other large bodies of water. The Project is within the Lake Wohlford Dam Failure Inundation Area. The City's Public Works Department maintains the Lake Wohlford Dam Emergency Action Plan addressing routes and responses in the event of a dam failure. Under the Multi-Jurisdictional Hazard Mitigation Plan, it identifies the Lake Wohlford Dam as having a low-risk failure.

The Project site is fully developed. The Project proposes the demolition of the existing structures and new construction of an energy storage facility. During construction and operations, the Project would implement the guidelines from the HMBP which will include procedures to address the release of pollutants in the event of a spill or emergency such as floods. Implementation of the HMBP, Lake Wohlford Dam Emergency Action Plan, and coordination with the City's Public Works Department would result in less than significant impacts.

e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less Than Significant Impact. As mentioned above, the Project will be unmanned during operations, with no buildings or parking areas and would not require restroom facilities. Any operational water that may be required for routine maintenance is expected to be provided by municipal sources through a temporary on-site hydrant meter. Limited water required during the construction phase is also expected to be provided by municipal sources through a temporary on-site hydrant meter. No groundwater would be used for any purposes during construction or operational phases of the Project. The majority of the Project would consist of gravel infill and remain pervious to allow

infiltration of precipitation. The incremental amount of impervious surface that would be introduced by the Project would be small and would not substantially interfere with groundwater recharge. In addition, drainage and retention basins will be installed onsite to handle any additional flows created by the additional impervious surface on the Project site. As a result, 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.

4.11 LAND USE AND PLANNING

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	☐	☐	☐	☒
(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?	☐	☐	☒	☐

4.11.1 Impact Analysis

a) Would the project physically divide an established community?

No Impact. The Project is consistent with surrounding general industrial land use. The Project would include construction of an access road but does not propose the introduction of major infrastructure such as public roadways, facilities, or water supply systems. The project would not physically divide an established community; therefore, no impact would occur.

b) Would the project 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?

Less than Significant Impact. The Project Site is located within the City's General Plan Land Use Designation of General Industrial, and is zoned Planned Development (PD-I).. The Project includes a request to amend the zone to General Industrial (M-2). This designation allows "utilities," which includes battery storage facilities such as the Proposed Project. Under Section 33-564 of the City's Municipal Code, utilities are considered a permitted use within the M-2 zone. Therefore, the Project would be consistent with the City's General Plan. To ensure adequate security and to protect the general public, the Proposed Project includes a zone text amendment to permit walls and other security gates or fences to be up to 12 feet in height for industrial areas. The Proposed Project operations involve electrical and power generation equipment that presents hazards such as electrocution, falls, and potential fires. The currently allowed wall height of up to 8 feet is easily scalable by a 6-foot-tall person and a taller wall is required to provide the appropriate security level for this land use. Increasing the wall height up to 12 feet can effectively prevent the hazards mentioned above and even improve public health, safety, and welfare for the surrounding properties. Furthermore, the proposed wall design and materials will be consistent with other institutional projects nearby at the City's request and would not block access or encroach on neighboring properties.

A revision to the permitted wall/fence height is consistent with the City of Escondido's General Plan as it would help to further GOAL 3 within the Community Protection Element. Goal 3 states: Protection

of life and property, and enforcement of law that enhances personal safety in the community. This goal can be achieved by implementing Police Services Policy 3.7 which requires that defensible space practices that contribute to personal and property safety and crime prevention be incorporated into development projects, such as security and design features (e.g., site and building lighting, visual observation of areas, secured areas). This would include the adequate wall height needed to protect the surrounding community. The Proposed Project will not create a significant environmental impact due to a conflict with existing land use policies. The proposed amendments will be consistent with the City's General Plan; impacts would be less than significant.

4.12 MINERAL RESOURCES

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

4.12.1 Impact Analysis

a) Would the project 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?

b) Would the project 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?

No Impact. According to maps published in the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Mineral Resources* (County 2008), the Project Area is classified as Mineral Resource Zone 4 (MRZ-4) and has no known mineral resource deposits in close proximity; the MRZ-4 classification defines areas where available information is inadequate to assign another category. The Project site is zoned Planned Development Industrial (PD-I) and is not designated for mineral extraction or compatible uses. There are no recorded mineral deposits within the Project Area; therefore, no impacts would occur.

4.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☒	☐
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☐	☒

A noise study was completed by Ldn Consulting in October 2022 to determine the noise impacts associated with the construction or operation of Proposed Project. To determine the existing noise environment and to assess potential noise impacts, 24-hour measurements were taken at two locations with the greatest impact potential from the Proposed Project (i.e., having a relatively flat terrain and minimal or no obstruction from trees or structures).

Existing Noise Conditions

The site is located east of Interstate 15, between Washington Avenue and Valley Parkway. Access to the site is from Interstate 15 to the west via Valley Parkway to the south. Existing noise occurs mainly from vehicular traffic traveling on Interstate 15 and nearby/adjacent roadways.

Ambient noise level measurements were taken at two locations (Monitoring Location 1 [M1] and Monitoring Location 2 [M2]). M1 was located across the Escondido Creek, to the southeast at the existing commercial and retail uses; M2 was located south of West Valley Parkway, at the nearest residential uses along Upas Street (Appendix C). Noise measurements were recorded between 10 a.m. Monday, October 10 and 10 a.m. Tuesday, October 11, 2022. Noise measurements were taken using Larson-Davis Spark Model 706 Type 2 precision sound level meters, programmed, in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were mounted on a tripod 5 feet above the ground and equipped with a windscreen during all measurements. The sound level meter was calibrated before and after the monitoring using a Larson-Davis calibrator, Model CAL 200.

The results of the noise level measurement are presented in Table 4-7 and the noise monitoring data printouts are provided in Appendix C.

Table 4-7. Long-Term Noise Level Summary

Time	M1 (dBA L_{eq})	M2 (dBA L_{eq})
11:00 a.m.	68.1	62.8
12:00 p.m.	61.2	62.9
1:00 p.m.	60.9	63.4
2:00 p.m.	62.7	63.6
3:00 p.m.	62.3	64.2
4:00 p.m.	63.1	64.2

Time	M1 (dBA L_{eq})	M2 (dBA L_{eq})
5:00 p.m.	63	64.7
6:00 p.m.	62.1	64.6
7:00 p.m.	61.9	63.9
8:00 p.m.	62.5	63.2
9:00 p.m.	63	62.7
10:00 p.m.	58.9	60.9
11:00 p.m.	57.7	59.7
12:00 a.m.	49.8	58.5
1:00 a.m.	53.4	56.9
2:00 a.m.	56.5	51.5
3:00 a.m.	43.8	52.2
4:00 a.m.	59.1	52.8
5:00 a.m.	60.6	56
6:00 a.m.	60.2	59.1
7:00 a.m.	60.7	60.4
8:00 a.m.	61.2	62.6
9:00 a.m.	63.1	60.8
10:00 a.m.	61	61.9
Overall	**61.6**	**61.8**

4.13.1 Impact Analysis

a) Would the project result in 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?

Less Than Significant Impact. The Proposed Project would not generate 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. The following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the Proposed Project and compares the noise levels to the City standards.

Construction Noise

Noise impacts from construction activities associated with the Proposed Project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Sections 17-234 and 17-240 of the City's Municipal Code regulate construction noise. Any piece of construction equipment or any combination of construction equipment cannot be operated so as to cause an average noise level excess of 75 dBA Leq during the allowable hours of operation. Per City regulations, construction equipment can only be operated from 7:00 a.m. to 6:00 p.m., Monday through Friday, and on Saturday from 9:00 a.m. to 5:00 p.m. Construction equipment cannot be operated on Sundays or holidays. Operation of any construction equipment during non-allowable hours is permitted only by a variance from the City Manager.

Table 4-8 below shows noise levels associated with each type of construction equipment that would be used during construction of the Proposed Project.

Table 4-8. Construction Noise Levels

Construction Equipment	Quantity	Duty cycle (hours/day)	Source Level at 50 feet (dBA)	Combined Noise Level at 50 feet (dBA L_{eq}-8h)
Dozer	1	8	74	74.0
Grader	1	8	73	73.0
Excavator	1	8	78	78.0
Water Truck	1	8	70	70.0
Dump Truck	1	8	75	75.0
Roller/Compactor	1	8	74	74.0
			Total Noise Level @ 50 Feet (dBA)	**82.4**
			Distance	120
			Noise Reduction Due to Distance	-7.6
			Nearest Property Line Noise Level	**74.8**

As shown in Table 4-8, if all the equipment was operating simultaneously and in the same location (which is not physically possible) at a distance as close as 120 feet from the nearest property line, the point source noise attenuation from construction activities would be -7.6 dBA. This would result in an anticipated worst-case 8-hour-average combined noise level of 74.8 dBA at the northern (closest) property line. Given this and the spatial separation of the equipment, the noise levels will comply with the City of Escondido's 75 dBA standard at all Project property lines; therefore, impacts would be less than significant, and no mitigation is required.

Operational Noise

The Proposed Project would consist of the development and operation of an energy storage project. The Project would create operational noise from the proposed onsite equipment. The adjacent property to the northwest is zoned light industrial and has a noise standard of 70 dBA Leq anytime. The properties to the northeast across Tulip Street are zoned industrial and have a noise standard of 75 dBA Leq anytime. The property to the south and southeast across the Escondido Creek is zoned SPA 9, Downtown Specific Plan; the Downtown Specific Plan does not indicate a land use goal for this area other than residential uses are not permitted, however, the existing land use is commercial, therefore, the evening noise standard of 55 dBA Leq was utilized. The nearest residential land use is

located south of West Valley Parkway along Upas Street more than 900 feet southwest of the Project site and has an evening noise standard of 45 dBA Leq.

Project Phase	Cumulative Noise Level by Property Line Type			
	Residential	Commercial	Light Industrial	General Industrial
Phase 1	39	51	60	58
Phase 1 and 2	42	52	56	56
Significance Threshold	**45**	**55**	**70**	**75**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

The unmitigated noise levels from the battery storage containers were found to be below the City's evening thresholds at all property lines. The allowable one-hour average sound level at the nearest residences is the lowest ambient noise level of 51.5 dBA. The Project would be in compliance with the ambient noise level as well as the more restrictive nighttime threshold of 45 dBA. Therefore, impacts would be less than significant, and no mitigation is required.

Facility Maintenance

Periodic site maintenance of the BESS facility would be required, is anticipated to occur at most 10 times per year and would generally require less than one day to complete. Section 10.80.040 of the Noise Ordinance sets a most restrictive operational exterior noise limit for the noise sensitive land uses of 60 dBA L_{eq} for daytime hours of 7 a.m. to 7 p.m. Therefore, the most restrictive 60 dBA L_{eq} standard was applied at the property lines. On-site activities are not anticipated to result in noise levels in excess of existing landscape maintenance on the existing and surrounding properties. Therefore, on-site maintenance is not anticipated to result in a substantial increase in noise levels. Similarly, on-site maintenance is not anticipated to exceed City noise standards. Additionally, since the on-site operations will be limited to the daytime hours of 7 a.m. to 7 p.m., impacts would be less than significant, and no mitigation is required.

b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Less Than Significant Impact. The proposed project would not generate or expose persons to excessive groundborne vibration or groundborne noise levels. The following section analyzes the potential vibration impacts associated with the construction and operations of the Proposed Project.

Construction-Related Vibration Impacts

Vibration impacts from construction activities associated with the Proposed Project would typically be created from the operation of heavy off-road equipment. Equipment proposed for use during construction includes dozer, grader, excavator, water truck, dump truck, and drum roller.

The City's Municipal Code does not explicitly limit vibration levels associated with construction equipment. The nearest offsite structure where people may sit, which increases susceptibility to vibration, is greater than 120 feet away from the Project site. Furthermore, the Project would utilize a drum roller rather than a vibratory roller or other type of vibratory compactor, which would produce

less vibration during construction activities. The Project would also follow City noise regulations limiting use of construction equipment from 7:00 a.m. to 6:00 p.m., Monday through Friday, and on Saturday from 9:00 a.m. to 5:00 p.m. Impacts would be less than significant.

Operations-Related Vibration Impacts

The Proposed Project would consist of the operation of an energy storage facility. The on-going operation of the Proposed Project would not include the operation of any known vibration sources. Therefore, a less than significant vibration impact is anticipated from the operation of the Proposed Project.

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 us airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The Proposed Project would not expose people residing or working in the Project area to excessive noise levels from aircraft. The nearest airport is McClellan-Palomar Airport, located approximately 10.4 miles northwest of the Project site. The Project site is located outside of the McClellan-Palomar Airport's Influence Area and Noise Impact Notification Area (McClellan-Palomar Airport 2005). No impacts would occur from aircraft noise.

4.14 POPULATION AND HOUSING

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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)?	☐	☐	☐	☒
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.14.1 Impact Analysis

a) *Would the project 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)?*

No Impact. The Project is a lithium-ion BESS facility; therefore, it does not involve development of residential units. Additionally, the Project would not induce population growth in the area because there would be no operational employees during operation of the Project. The Project would not cause an extension of new major infrastructure, such as public roadways or other infrastructure, into previously unserved areas; and no regulatory changes would occur that would allow increased population growth. Therefore, no impacts would occur.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would not displace any existing people or housing because the Project site currently contains a non-operational ice-rink and a 50-MW natural gas power plant. No impacts would occur.

4.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 objectives for any of the public services:				
	i) Fire Protection?	☐	☐	☒	☐
	ii) Police Protection?	☐	☐	☒	☐
	iii) Schools?	☐	☐	☐	☒
	iv) Parks?	☐	☐	☐	☒
	v) Other public facilities?	☐	☐	☒	☐

4.15.1 Impact Analysis

a) i) 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 objectives for fire protection?

Less Than Significant Impact. The Escondido Fire Department provides service to the Project site. The nearest fire station to the Project site is Escondido Fire Department Station 1, located at 310 North Quince Street #1, Escondido, CA. The station is approximately 0.5 mile west of the Project site, or an approximately 2-minute drive (Google 2022). The Project consists of lithium-based battery modules installed in racks and housed within purpose-built outdoor BESS enclosures. Each induvial module within an enclosure is equipped with integrated operational management systems, fire and safety systems (HVAC systems, ventilation, gas, heat and smoke detection and alarms, and fire suppression systems) all designed, constructed, and operated pursuant to the version of the California Fire Code in effect at the time of building permit issuance. Implementation of the Project is not expected to significantly affect service ratios, response times, or other performance objectives for fire protection. Thus, the Project would not result in the construction of new or physically altered fire protection facilities. Impacts would be less than significant.

ii) 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 objectives for police protection?

Less Than Significant Impact. The Escondido Police Department provides service to the Project Site. The nearest police station to the Project site is the Escondido Police Department, located at 1163 Centre City Parkway, Escondido, CA. The station is approximately 1.2 miles north of the Project site, or an approximately 6-minute drive (Google 2022). Implementation of the Project would not substantially increase the need for additional police protection services to the Project site because the Project would be unmanned and surrounded by security fencing and lighting. As a result, Project implementation is not anticipated to increase response times to the Project site or surrounding vicinity or require the construction of new or physically altered police protection facilities. Impacts would be less than significant.

iii) 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 objectives for schools?

No Impact. The Project would be unmanned during operations. It is expected that between two to four staff members will visit the site weekly and as needed for maintenance and monitoring of the Project; these visits would not induce population growth in the area. As such, implementation of the Project would not result in the need for the construction or physical alteration of school facilities and no impacts would occur.

iv) 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 objectives for parks?

No Impact. As mentioned above, the Project would be unmanned during operations. It is expected that between two to four staff members will visit the site weekly and as needed for maintenance and monitoring of the Project; these visits would not induce population growth in the area. As such, implementation of the Project would not result in the need for the construction or physical alteration of park facilities and no impacts would occur.

v) 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 objectives for other public facilities?

Less Than Significant Impact. The Project is industrial in nature and would be unmanned during operations; thus, the Project would not result in impacts on public facilities beyond those described above in Section 4.15. Impacts would be less than significant.

4.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

4.16.1 Impact Analysis

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?

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. In addition, since the Project includes construction of an unmanned facility, it would not induce population growth in the area that would impact recreational facilities. No impact to parks or recreation facilities would occur.

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?

No Impact. The Project does not include recreational facilities or require the construction or expansion of recreational facilities. No impacts would occur.

4.17 TRANSPORTATION

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	☐	☐	☒	☐
(b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
(c)	Substantially increase hazards due to a geometric design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
(d)	Result in inadequate emergency access?	☐	☐	☒	☐

A Transportation Study Memorandum was prepared for the Proposed Project by Westwood Professional Services, Inc. (Westwood) in October 2022. The purpose of this technical report is to analyze potential Trip Generation and Parking impacts associated with construction and operation of the Proposed Project. There will be minimal traffic generated by the Project once the construction is complete because the Project would be unmanned during normal operations. It is expected that between two to four staff members will visit the site weekly and as needed for maintenance and monitoring of the Project. Because the Project site will be unmanned, the Traffic Letter Report focuses on the construction phase of the Project. Results from the report have been summarized below, but for more details regarding methods and results refer to Appendix D.

Construction of the Project will generate additional traffic in the surrounding area. Construction traffic relates to the traffic generated from construction vehicles, which consist primarily of heavy-duty trucks, smaller vendor trucks, and worker vehicles. Project construction includes demolition of the existing facility, site preparation and grading, installation of drainage and retention basins, foundations/supports, setting battery enclosures, wiring and electrical system installation, and assembly of the accessory components including inverter transformers and generation step-up transformers. Construction activities would occur in three parts: Demolition, Phase 1 Construction, and Phase 2 Construction. Earth cut and fill are proposed to be balanced within the Project site such that no import of fill material or export of *in-situ* material is proposed.

The Project would limit the use of construction equipment from 7:00 a.m. to 6:00 p.m., Monday through Friday, and on Saturday from 9:00 a.m. to 5:00 p.m. Completion of Project construction and start of operations is expected to occur in 2024/2025 for Phase 1, and 2026/2027 for Phase 2. Battery storage construction projects will generally exhibit a bell curve distribution of workers throughout the construction period. Initial site mobilization and early site preparation work will have fewer workers, then the number of workers will peak during the period of greatest activity. As construction draws to a close, the average number of workers per day will decrease as crews complete their work. Typically, each worker would be expected to arrive and depart the site once per day, resulting in a daily trip rate of two (2) vehicle trips per worker per day. A preliminary estimate of 125 daily trips is projected during the peak of construction for the Proposed Project.

The Project would remain unmanned during normal operations, and it is expected that between two to four staff members will visit the site weekly and as needed for maintenance and monitoring of the Project. The Project is conservatively expected to generate as many as 35 weekday trips for up to nine full-time employees during operations.

4.17.1 Impact Analysis

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

Less than Significant Impact. Senate Bill (SB) 743 was signed in 2013 with the intent to identify new metrics for identifying and mitigating transportation impacts within CEQA. For land use projects, the Governor's Office of Planning and Research (OPR) identified Vehicle Miles Traveled (VMT) per capita, VMT per employee, and net VMT as new metrics for transportation analysis. Per the Office of Planning and Research Technical Advisory, lead agencies may screen out projects from VMT impacts using various metrics.

According to the City's Transportation Impact Analysis Guidelines (City 2021b), Project generating 200 or fewer net new daily vehicle trips may be presumed to have a less than significant impact. The Traffic Impact Analysis provided in Appendix D conservatively estimates that the Project would generate as many as 125 daily trips during the construction period and as many as 35 new daily trips during operations, both of which are below the City's significance threshold of 200 daily trips; therefore, impacts would be less than significant.

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

Less than Significant Impact. Senate Bill (SB) 743 was signed in 2013 with the intent to identify new metrics for identifying and mitigating transportation impacts within CEQA. For land use projects, the Governor's Office of Planning and Research (OPR) identified Vehicle Miles Traveled (VMT) per capita, VMT per employee, and net VMT as new metrics for transportation analysis.

Per the Office of Planning and Research Technical Advisory, lead agencies may screen out projects from VMT impacts using various metrics. According to the City's Transportation Impact Analysis Guidelines (City 2021b), Project generating 200 or fewer net new daily vehicle trips may be presumed to have a less than significant impact.

The Project would involve the demolition of existing structure and construction of a new energy storage facility. Construction operations will include trips involving construction equipment and construction workers traveling to and from the Project site. While there would be an increased in trips during the construction period, this would be short term and the level of traffic is unlikely to degrade the existing street segments.

The operations of the facility would be mostly unmanned outside of staff visiting the site for monitoring and maintenance on a weekly basis or as needed. According to the Air Quality Analysis, the Project's trip generation was estimated to be four trips per day during a worst-case project scenario which is less than the 200 trip requirements by the City's Transportation Impact Analysis. Furthermore, the Project site has been used for industrial uses and the Project is not introducing a new use to the site that could affect the number of trips required for project operations. Based on the Project operations and estimated trips, the Project would result in less than significant impacts.

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

Less than Significant Impact. Demolition and construction would occur within the Project site. There are no proposed changes to the existing driveways that would create a driving hazard. The Project will be visited by staff for maintenance and monitoring, or by emergency responders in the event of an emergency. The onsite access road would accommodate large trucks and vehicles, including fire trucks per City regulations. Therefore, the Project would not significantly increase hazards due to design features or incompatible uses. Impacts would be less than significant.

d) Would the project result in inadequate emergency access?

Less than Significant Impact. The construction process would be confined to the boundaries of the Project site with only temporary impacts to surrounding roadways. Should temporary lane closures or detours be required for safe delivery of materials during construction or operation, the required permits will be obtained so that the activities conducted would not interfere with emergency operations. On a long-term operational basis, the Project is not anticipated to generate traffic capable

of interfering with emergency operations. Furthermore, the Project site plans will be reviewed by the City and the fire department to ensure adequate access and circulation to the site in the event of an emergency. Impacts would be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

18.	**TRIBAL CULTURAL RESOURCES.** **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	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 section 5020.1(k), or	☐	☒	☐	☐
(b)	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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

4.18.1 Impact Analysis

a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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 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 section 5020.1(k)?*

b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Less than Significant With Mitigation Incorporated. On September 19, 2022, Chambers Group requested that the Native American Heritage Commission (NAHC) conduct a search of its Sacred Lands File (SLF) to determine if resources important to Native Americans have been recorded in the Project footprint and buffer area. As of the date of the cultural resources report (Appendix B), no responses have been received; however, it is noted that a 2020 cultural resources survey project located approximately 350 m north-northeast returned a positive finding from the NAHC (Helix 2020).

Based on the results of the records search review and background research, there is potential to encounter buried archaeological and paleontological resources. Similarly, consultation with Native American groups may indicate the presence of additional significant resources.

The City sent letters to the Rincon Band of Luiseno Indians, San Luis Rey Band of Mission Indians, San Pasqual Band of Mission Indians, Soboba Band of Luiseno Indians, and Mesa Grande Band of Mission Indians to initial Assembly Bill 52 (AB 52 Consultation) regarding the Proposed Project. A representative from the San Pasqual Band of Mission Indians requested consultation. The City provided the tribe the requested Cultural Report and coordinated a site visit of the Project site. The tribe conclude consultation on June 15, 2023 with the request that a monitor be present during construction of the Project. As such, in addition to the mitigation measures noted in CUL-1 through CUL-10, TCR-1 will be implemented to address potential impacts to tribal cultural resources. Impacts therefore are less than significant with mitigation incorporated.

MM-TCR-1: Retain a Native American Monitor/Consultant: Prior to the commencement of any ground disturbing activity at the Project site, the Project applicant shall retain a Native American Monitor (Tribal Monitor) that is a documented lineal descendant from an ancestral tribe (of Kumeyay Descent) of the Project area. A copy of the executed contract shall be submitted to the Lead Agency prior to the issuance of any permit necessary to commence a ground-disturbing activity. It is the contractor's responsibility to ensure the proper scheduling of the Tribal Monitor with a minimum of 48 hours' notice. If the scheduled Tribal Monitor does not arrive on time or without prior warning of absence, the work may proceed, IF an archaeological monitor is on-site. Per CUL-02, the participating Tribe(s) shall coordinate with the qualified archaeologist and the applicant to prepare a CRMP document that outlines an agreed upon monitoring program and associated protocols and procedures. The Tribal Monitor will only be present on-site during the construction phases that involve ground-disturbing activities involving intact, native, previously unexcavated, or undocumented fill sediments, and shall have the authority to temporarily halt or divert construction equipment if a potential find is made. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site Tribal monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Tribal Representatives or Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources (TCRs). Upon discovery of any TCRs, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. If the find is archaeological in nature, a qualified archaeologist must inspect it and work with the Tribal monitor to determine appropriate evaluation methods. All TCRs unearthed by project activities shall be evaluated by the Tribal monitor and a qualified archaeologist. If the resources are Native American in origin, the appropriate ancestral Tribe may be offered the respective resources, once the finds have been properly documented and analyzed by a qualified archaeologist. The participating Tribe, in consultation with the City and qualified archaeologist, will determine the correct treatment of the artifacts. Repatriation is the preferred manner of treatment. If repatriation is not feasible, preservation in place or treatment that includes implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis shall be implemented.

4.19 UTILITIES AND SERVICE SYSTEMS

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of 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?	☐	☐	☒	☐
(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?	☐	☐	☐	☒
(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?	☐	☐	☒	☐
(e)	Negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
(f)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	☐	☐	☒	☐

4.19.1 Impact Analysis

a) Would the project 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 expansion of which could cause significant environmental effects?

Less Than Significant Impact. The Project includes a high-voltage generation tie-line that would interconnect to the existing, adjacent SDGE Esco Substation. The batteries will be charged from the SDGE grid via the Project's interconnection to the SDGE Esco Substation. The Proposed Project would charge during the day when solar energy production is at it is peak on SDGE's electrical grid, store the energy, and then re-supply the grid at night, as needed. Operational water that may be required for routine maintenance would be trucked in from offsite or sourced by a new municipal service and would be minimal if it is even required for Project operations. Since no habitable structures will be constructed as part of the Project, the operational water required for the Project will not require the need for new or expanded water or wastewater facilities. Drainage facilities will be installed to route stormwater to the existing on-site storm drain systems in a manner generally consistent with the existing facilities. The Project does not require construction or expansion of wastewater treatment facilities because no wastewater would be generated. Similarly, no natural gas or telecommunications facilities would be required. Therefore, the Project would not require the construction of new or expanded facilities and impacts would be less than significant.

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

Less Than Significant Impact. The Project would not require restroom facilities. Any operational water that may be required for routine maintenance would be trucked in from offsite or sourced by a new municipal service. No groundwater would be used for any purposes during construction or operational phases of the Project. The approximately 10 acre-feet of water required during the duration of construction is expected to be provided by municipal sources through a temporary on-site hydrant meter. Therefore, the Project would have sufficient water supplies available to serve the Project and impacts would be less than significant.

c) Would the project 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?

No Impact. The Project would be remotely operated and there would be no full-time employees at the site; therefore, no bathroom or septic facilities would be required. No wastewater would be generated as a result of the Project. Therefore, the Project will not interfere with any wastewater treatment providers service capacity and no impacts would occur.

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?

e) Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The Project would be unmanned and is expected to generate minimal solid waste. 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 21440 et seq.). There are four permitted active landfills in San Diego County with remaining capacity, the Sycamore Landfill being the closest, approximately 20 miles south of the Project site. The Sycamore Landfill is estimated to have sufficient capacity into the year 2031 and the Las Pulgas Landfill, approximately 25 miles north of the Project site, is estimated to have capacity into the year 2047 (CalRecycle 2022). Therefore, there is sufficient existing permitted solid waste capacity in the City should future needs for solid waste ever arise, and the Project would not impair the attainment of solid waste reduction goals as no solid waste is currently expected. Impacts would be less than significant.

f) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project would be unmanned and would generate minimal solid waste. During operations, 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. Impacts would be less than significant.

4.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

4.20.1 Impact Analysis

a) Would the project impair an adopted emergency response plan or emergency evacuation plan?

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

c) Would the project 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?

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?

Less than Significant Impact. As discussed in Section 4.9 Hazards and Hazardous Materials, the Project site is not located within a fire hazard zone per the CAL FIRE maps. The Project site is designated to be within a moderate fire hazard areas according to the Wildfire Risk figure in the GPU Final EIR (City 2012).

As discussed in Section 4.9 Hazards and Hazardous Materials, City maintains an Emergency Action Plan for City employees, and the CERT program with the Escondido Fire Department and the residents of the City. County wide, emergency response and evacuation plans include the San Diego County Multi—Jurisdictional Hazard Mitigation Plan and Operational Area.

The Project would be confined to the boundaries of the Project site and would not interfere or require changes to any existing evacuation and emergency response plans. Any lane closures required would be coordinated with the City. Traffic generation during Project operations are not expected to interfere with emergency operations.

The Project site is located within an urbanized area with limited vegetation onsite. The area has been disturbed with the presence of existing infrastructure. The Project site is relatively flat with no slopes and would not be susceptible to unstable land conditions (Section 4.7 Geology and Soils) that would exacerbate wildfire risk. The Project would not require installation or maintenance of infrastructures such as roads, fuel break, emergency water sources or powerlines.

The Project will include installation of BESS structures. These are not expected to create a fire hazard with the implementation of a HMBP. In addition, the safety features and design of the Project would be implemented to address any potential fire hazards. Therefore, because of the introduction of the BESS structures along with the implementation of the HMBP and other safety features of the Project, impacts would be less than significant.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☒	☐
(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?)	☐	☒	☐	☐
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

4.21.1 Impact Analysis

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?

Less Than Significant Impact. The Project site is developed and does not have areas designated as a habitat for any candidate, sensitive or special status species. According to the MHCP and MSCP Area Map provided in the GPU EIR, the Project site is not located within or adjacent to any designated MHCP/MSCP areas, and its classification is designated as Urban/Development (City 2012). While there are no sensitive species that are expected to occur, the MBTA applies to bird species native to the U.S.

To address potential impacts to nesting birds, mitigation measure MM-BIO-1 would be implemented; impacts to nesting birds would be less than significant. No historic resources or important examples of California history or pre-history were found within a 0.5-mile radius of the Project site. Overall, impacts are considered to be less than significant.

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?)*

Less than Significant Impact with Mitigation Incorporated. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impact of related projects in proximity to the Project such that impacts occur that are greater than the impacts of the Project alone. As discussed above, it has been determined that the Project would have no impact, impacts would be less than significant, or impacts would be less than significant with implementation of mitigation measures. Where the Project would have no impact or a less than significant impact, it would not contribute to cumulative impacts.

According to the City's Planning website, other future projects in the vicinity of the Proposed Project include those listed below in Table 4-9.

Table 4-9. Future Projects in the Vicinity of the Proposed Project

Project	Description	Status
PHG 15-0010 - EDI CUP	Expansion of Materials Recovery Facility	In Review
PHG 14-0022 - La Terraza Office Building/Parking Lot	Office	Approved
TPM 2004-16 - Tulip	3 SFR	Approved
ADM14-0043 - 130 N. Hale Southland Paving	Office, Wash Bay & Maintenance Shop	Approved
209 N. Tulip. SUB18-0017	4-Lot TPM	Approved
ADM 18-0168, EDI. 1044 W. Mission	Modification in Anaerobic Digestor	Under Construction
PHG 19-0058, 1280 W. Valley Parkway	Drive-through CUP for Raising Canes	Approved
ADM 19-0043 1220 W. Washington	Commercial Store Expansion	Approved

While these projects will occur nearby the Proposed Project, the impacts associated with the Proposed Project would not be significant when compared to applicable thresholds; therefore, none of the impacts associated with the Project would make cumulatively considerable, incremental contributions to significant cumulative impacts.

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

Less than Significant Impact. Effects to human beings are generally associated with air quality, geology/soils, hazards/hazardous materials, noise, and traffic safety. The Proposed Project would not

result in any significant impacts that would cause adverse effects on human beings, either directly or indirectly. As noted in Sections 4.3, 4.7, 4.9, 4.13, and 4.17, no significant impacts would occur as a result of Project construction or operation; therefore, impacts would be less than significant.

SECTION 5.0 – REFERENCES

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