DRAFT

Initial Study/Mitigated Negative Declaration

Double Butte Storage Project

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AES	Applied Energy Services
APE	area of potential effect
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BESS	Battery Energy Storage System
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFC	California Fire Code
City	City of Menifee
CO	carbon monoxide
CO_2	carbon dioxide
COA	condition of approval
CPTED	crime prevention through environmental design
CPUC	California Public Utilities Commission
dBA	A-weighted decibel
DBESP	Determination of Biologically Equivalent or Superior Preservation
DTSC	Department of Toxic Substances Control
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
EPA	U.S. Environmental Protection Agency
FHSZ	Fire Hazard Severity Zone
gen-tie	generation-tie
GHG	greenhouse gas
GP	General Plan
HIC	Chronic Hazard Index
HMA	Hazard Mitigation Analysis
HVAC	heating, ventilation, and air conditioning
IEEC	Inland Empire Energy Center
IFC	International Fire Code

Acronym/Abbreviation	Definition
ips	inches per second
IS	Initial Study
kV	kilovolt
LID	Low Impact Development
LOS	level of service
LST	localized significance threshold
MM	Mitigation Measure
MMC	Menifee Municipal Code
MND	Mitigated Negative Declaration
MPD	Menifee Police Department
MRZ	mineral resource zone
MS4	Municipal Separate Storm Sewer System
MSHCP	Multiple Species Habitat Conservation Plan
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NFPA	National Fire Protection Association
NHMLA	Natural History Museum of Los Angeles County
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O&M	operations and maintenance
O_3	ozone
OHWM	ordinary high-water mark
OSHA	Occupational Safety and Health Administration
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
POCO	Point of Change of Ownership
PPV	peak particle velocity
PRC	California Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Program
Project	Double Butte Storage Project
RCTC	Riverside County Transportation Commission
ROW	right-of-way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RVCFD	Riverside County Fire Department
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCADA	Supervisory Control and Data Acquisition
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SMARA	Surface Mining and Reclamation Act of 1975

Acronym/Abbreviation	Definition
SO_x	sulfur oxides
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
SVP	Society of Vertebrate Paleontology
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
TPA	Transit Priority Area
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WSC	Western Science Center

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1 Introduction

1.1 Project Overview

Double Butte LLC, (Applicant) proposes to construct and operate a 500-MW Battery Energy Storage System (BESS) facility, the Double Butte Storage Project (Project). Construction of the Project is anticipated to occur in a single phase. It will interconnect with the Southern California Edison (SCE) Valley Substation through newly constructed overhead generation-intertie (gen-tie) lines. The BESS facility will utilize various battery technologies, such as lithium-ion and flow batteries, to store electrical energy from the grid, ensuring reliability during periods of high customer demand and contributing to California's renewable energy goals. Key components include battery modules and power conversion equipment, with external access-only containers housing the battery modules. These containers will be equipped with robust heating, ventilation, and air conditioning (HVAC) systems to maintain proper operating temperatures and monitored via a Supervisory Control and Data Acquisition (SCADA) platform. Safety measures include a seven-foot decorative block wall around the perimeter of the site for security.

The Project aims to support California's Renewable Portfolio Standard and energy storage objectives while making efficient use of vacant land near existing infrastructure. Battery technology, thermal management, and fire protection are integral to the system's design, ensuring safety and reliability. Interconnection involves the construction of a 500/34.5/13/8 kilovolt (kV) substation on-site and overhead gen-tie lines to connect with the SCE Valley Substation. The gen-tie line design and structures are adaptable to meet final engineering and SCE's requirements. SCADA systems will enable remote monitoring and control of the facility, with an emphasis on safety. The Project will include perimeter walls/fencing, landscaping, signage, and lighting to enhance security and safety, pursuant to city requirements. Utilities, public services, and infrastructure needs will be met by existing utility providers, with no on-site water or sewer services required. A water line would be installed in the Palomar Road right-of-way to supply newly installed fire hydrants. The Project would also construct a recycled water landscape irrigation system to serve landscaped areas. Roadway improvements along Palomar Road, San Jacinto Road and McLaughlin Road will provide adequate site access for workers and emergency services. Site access is provided by driveways on Palomar Road and San Jacinto Road, with on-site parking for operational and maintenance personnel.

For purposes of the environmental analysis, the project is assumed to go into commercial operation by 2025[1]. Construction of the Project and commencement of operation would occur following entitlement and permitting. Daily operations, monitoring, and dispatching will be conducted remotely, eliminating the need for permanent on-site personnel. Routine inspections and maintenance will involve visits by 8 to 12 staff members. Hazardous materials may be stored on-site for maintenance, managed in compliance with state regulations. At the Project's end of life, equipment will be removed and recycled, concluding a lifespan of approximately 30 years. The Project represents a significant contribution to California's energy infrastructure, combining state-of-the-art technology with rigorous safety and environmental standards, and aligns with the mission of Applied Energy Services (AES) to advance clean energy solutions.

1.2 Project Planning Setting

The Project Planning Area is situated in an industrial landscape within the City of Menifee, California. Specifically, it falls within Planning Area 3 (PA 3) of the Menifee North Specific Plan No. 260 and is zoned for industrial use. The

[1] The analysis assumes a construction start date of April 2024, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

City of Menifee Development Code allows for BESS projects as a conditional use within the Business Park/Light Industrial (BP) and Heavy Industrial/Manufacturing (HI) zones, as well as Planning Areas 2 and 3 of the Menifee North Specific Plan, therefore the Project would require a Conditional Use Permit. The Project site is adjacent to various industrial and commercial properties to the east, a Riverside County Transportation Commission (RCTC) rail line and industrial land to the north, the decommissioned Inland Empire Energy Center[2] (IEEC), which is now undergoing redevelopment for an approved BESS project (Nova Power Bank Project) immediately to the west, and an SCE transmission corridor and a Riverside County Flood Control channel to the south. The North Menifee Specific Plan determined the industrial setting is well-suited for the construction and operation of a 500-MW BESS facility, as it aligns with the intent of the industrial zoning and minimizes impacts on neighboring land uses. Additionally, the Project site's proximity to existing infrastructure, such as the SCE Valley Substation located approximately 0.25 miles east of the Project site makes it an ideal location for supporting California's electric grid and achieving renewable energy goals.

1.3 California Environmental Quality Act Compliance

The City of Menifee has prepared this Initial Study/Mitigated Negative Declaration (IS/MND) to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of construction and operation of the proposed Project. This IS/MND has been prepared in accordance with the California Environmental Quality Act (CEQA); California Public Resources Code (PRC) Section 21000 et seq.; and the CEQA Guidelines, Title 14 California Code of Regulations (CCR) Section 15000 et seq.

Pursuant to CEQA (PRC 21000 et seq.), the lead agency must prepare an IS for discretionary projects such as the proposed Project to determine whether the proposed Project may have a significant adverse effect on the environment. The IS uses the significance criteria outlined in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). Article 6, Section 15070, Decision to Prepare a Negative Declaration or Mitigated Negative Declaration, of the CEQA Guidelines states the following:

A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

a. The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
b. The initial study identifies potentially significant effects, but:

   Revisions in the project plans or proposals made by, or agreed to by, the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment (14 CCR 15070).

Based on the analysis in the IS, it has been determined that all project-related environmental impacts would be reduced to a less-than-significant level with the incorporation of feasible mitigation measures. Therefore, adoption of an MND will satisfy the requirements of CEQA.

[2] On December 11, 2019, the California Energy Commission approved the premature decommissioning and demolition of the IEEC. Subsequently, Calpine Corporation received approval from the City of Menifee to demolish the IEEC and repurpose the site with a BESS.

2 Project Description

2.1 Project Location

The Project site encompasses 27 acres of vacant land within the City of Menifee (City), located along the western portion of Riverside County, see Figure 1: Regional Map. The Project site is located to the west of the intersection of Case/Matthews Road and Palomar Road, see Figure 2: Site Location. Situated within an industrial landscape, the Project's surroundings include a mix of commercial properties, industrial facilities, and vacant land, with notable neighbors such as the decommissioned IEEC, which is now undergoing redevelopment for an approved BESS project (Nova Power Bank Project) and the SCE Valley Substation.

Located within Riverside County, the Project's geographical coordinates are 33.7412 latitude and -117.1563 longitude. This Project is proposed to be constructed across several Assessor's Parcel Numbers (APNs), namely: 331-190-010, 331-190-011, 331-190-014, 331-190-017, 331-190-047, 331-190-060, and 331-190-056. A temporary construction laydown yard would be located on an approximately 4-acre portion of APN 331-240-011 located to the southeast of the Project site.

2.2 Surrounding Land Uses

The Project site is surrounded by primarily industrial land uses, including the decommissioned IEEC which is now undergoing redevelopment for an approved BESS project (Nova Power Bank Project), high voltage transmission lines, a Riverside County Flood Control channel, RCTC rail line, commercial and industrial properties, vacant land, and the SCE transmission corridor which connects to the SCE Valley Substation located approximately 0.25 miles east of the Project site, see Figure 3: Aerial Overview. Zoned for industrial use within PA 3 of the Menifee North Specific Plan No. 260, the Project aligns with the Industrial designation's objective of blending with adjacent industrial areas. The California Energy Commission approved the demolition of the IEEC, allowing for its repurposing into a BESS by Calpine Corporation which was approved by the City of Menifee on April 26, 2023 (PLN22-0015).

Table 1-1: Surrounding Land Uses

Direction	General Plan Designation	Zoning District	Existing Land Use
Project Site	Menifee North Specific Plan No. 260	Menifee North Specific Plan No. 260 – Planning Area 3 (Industrial)	Vacant
North	Business Park (BP) and Railroad (Rail)	Business Park (BP) and Rail (RX)	Case/Matthews Road, industrial uses and railroad
South	Menifee North Specific Plan No. 260	Menifee North Specific Plan No. 260 – Utility Easements	McLaughlin Road stormwater drainage channel and electric power transmission lines
East	Business Park (BP) and Railroad (Rail)	Business Park (BP) and Rail (RX)	Palomar Road, Vacant lot
West	Menifee North Specific Plan No. 260	Menifee North Specific Plan No. 260 – Planning Area 3	San Jacinto Road, decommissioned IEEC Generation Plant

Table 1-1: Surrounding Land Uses

Direction	General Plan Designation	Zoning District	Existing Land Use
			Facilities being redeveloped as a BESS facility

2.3 Environmental Setting

The Project Area is situated along the western portion of Riverside County which exhibits a diverse range of vegetation types of characteristics of South California's semi-arid Mediterranean climate. The region is known for a prominent presence of chaparral, dominated by hardy shrubs such as chamise, manzanita, sagebrush, and various ceanothus species. Grasslands, both native and non-native, sprawl across open areas, featuring grasses like the California oatgrass and purple needlegrass, alongside wild oats. Oak woodlands, graced by coast live oak and Engelmann oak trees, offer a haven for native shrubs and grasses beneath their canopies. Average annual temperatures in the Project region range from 41°F to 92°F, and the average annual precipitation is 12 inches (NOAA 2022).

The Project site elevation ranges from 1,440 to 1,456 feet above mean sea level and is located within Section 14 of Township 5 South, Range 3 West of the U.S. Geological Survey (USGS) 7.5-minute Romoland, California topographic quadrangle. The Project site is a disturbed infill lot that has been heavily plowed in many areas (see Figure 3: Aerial Overview). The Project area is comprised of bare ground, disturbed areas, and areas where fill was previously discarded and is surrounded by developed land to the west, east, and north. The southern boundary has a strip of fallow land (a utility easement with existing transmission lines) but developed land continues past the narrow fallow field. The eastern side of the site contains a swale that drains into the site and abates into upland. Five soil series are mapped within the Project: Exeter sandy loam (2% to 8% slopes), eroded; Exeter sandy loam, deep (2% to 8% slopes), eroded; Greenfield sandy loan, deep, (2% to 8% slopes), eroded; Monserate sandy loam, (0% to 5% slopes); Monserate sandy loam, shallow, (5% to 15% slopes), eroded (USDA 2023a). Vegetation communities within the Project site include sparsely vegetated playa (ephemeral annuals/Southern Hardpan vernal pool), disturbed habitat, unvegetated channel, and urban/developed. The site contains a mix of native and non-native vegetation (40% native, 60% non-native). The site is located within the Riverside Multiple Species Habitat Conservation Plan (MSHCP) area.

2.4 Project Characteristics

The Project is a 500-MW BESS that will interconnect to the nearby SCE Valley Substation via newly installed overhead gen-tie lines. The Project would use lithium-ion, flow, or other battery technologies to store electrical energy from the grid when demand is low and discharge the stored energy back onto the grid when customer demand is high.

The BESS system includes battery modules and power conversion equipment. The battery modules will be racked (like server racks) within hundreds of modular, external access-only containers approximately 8 -10 feet in height that will connect to associated electrical equipment. An HVAC system would be used to maintain specific operating temperatures within the enclosed containers, and the BESS operations will be controlled and monitored by AES via a SCADA system. Access to the site will be granted by Palomar Road and San Jacinto Road. A detailed description

of each component is provided below. Figure 4: Conceptual Site Plan shows the layout of the electrical equipment, interconnection, landscaping components, and internal and external access. Appendix A: Complete Conceptual Site Plan, includes a full set of site plans including an overall electrical plan, detailed preliminary landscape plan, and lighting plan. The Project will be designed in accordance with the latest applicable codes and safety certifications (i.e., UL, NFPA, NEC, IEEE) for the design, construction, and operations of the facility.

Battery Modules, Battery Technology, and Fire Protection

The battery system will consist of the primary battery and cooling system, Battery Management Systems (BMS), inverters, medium-voltage transformers, and an AC collection system. The current conceptual design is based on lithium-ion battery technology like the batteries found in rechargeable consumer electronics, such as cell phones, tablet computers and electric vehicles around the world. The battery will be specifically selected and designed to perform the required operations (i.e., approximately one cycle per day and 365 cycles per year) within critical safety parameters for this facility.

While the final battery system technology has not yet been selected, each battery storage container would be located within a metal frame outdoor-rated storage container with insulation and robust thermal management systems, with separate enclosures for the electronic controls and communications equipment, inverters, and transformers. The battery storage facility is designed such that the periodic maintenance and replacement of the underperforming battery components (each a single "module") can be easily performed on an as-needed basis, whereby each individual module can be replaced without needing to replace the entire system[3]. The BESS facility modules and associated infrastructure (e.g., inverters, switches, etc.) would be serviced regularly by certified technicians according to the manufacturer recommendations and as-needed to maintain optimum operations.

High Voltage Substation and Interconnection

A 500/34.5/13/8 kV substation will be constructed on the Project site to step up the voltage for interconnection to the SCE Valley Substation. The substation yard will be outfitted with switchgear and electrical equipment that meets PG&E standards, such as transformers, high-voltage switches, breakers, surge protectors, and a control house. Additionally, this substation will be equipped with grid intertie safety devices and switches required for integration with the high-voltage transmission system.

The project would connect to the SCE Valley Substation via overhead gen tie line along one of two alignments. The preferred gen-tie route begins at the on-site substation, extending eastward for 242 feet before crossing Case/Matthews Road. It continues parallel to Case Matthews Road, heading 1,500 feet before turning north towards the SCE Valley Substation and connects to a new dead-end structure representing the Point of Change of Ownership (POCO). At this point, SCE will be responsible for designing and constructing the line as it enters the substation, as well as making necessary improvements to the Valley Substation. The exact location of the gen-tie line will be determined during final engineering based on SCE's interconnection requirements and the presence of physical constraints.

In the alternative scenario, the gen-tie is routed to the southeast, exiting the project site boundary, crossing Palomar Road, and running parallel to the south side of Case/Mathews Road. The alignment traverses Case/Mathews Road approximately 550 feet from the Project boundary, then follows the regional flood control drainage for approximately 525 feet before turning north and advancing toward the substation and Point of Interconnection.

[3] A series of battery modules forms a battery "rack," and each rack is connected to a Battery Management System (BMS) to control that specific rack and control the voltage, current, and other operations.

To construct the gen-tie line AES is working to acquire new rights-of-way (ROWs), easements, and/or franchise agreements from affected public entities and private landowners.

Tower Structures

The gen-tie line will be constructed utilizing one of several structure types, including steel monopoles, lattice structures, or H-frame poles. These structures are designed to support the overhead transmission lines connecting the project substation to the SCE Valley Substation. On average, the gen-tie structures will stand approximately 145 feet tall, with certain locations requiring a maximum height of up to 195 feet to safely cross over existing overhead gen-tie lines. Riser and dead-end structures are anticipated to use poured concrete foundations, which will be approximately 10 feet in diameter and approximately 30 feet in depth. The final selection of structure type and height will be determined based on site-specific needs and engineering requirements.

Supervisory Control and Data Acquisition (SCADA)

The Project will have a SCADA system that allows for remote monitoring and the entire facility. The SCADA system will be able to monitor Project output and availability and to run real-time and historical diagnostics on the equipment. The Project would also have a cloud-based (with local human-machine interface) overall plant control system (site controller) that would provide monitoring of the BESS facility as well as control of the balance of facility systems. The microprocessor and cloud-based site-controller would provide control, monitoring, alarm, and data storage functions for plant systems as well as communication with the Project's SCADA system. Critically, this system monitors all system facilities and would remotely and instantaneously shut down all system facilities in the event of an anomaly recognized by the system (e.g., if system temperatures exceed pre-determined thresholds).

Site Access, Circulation, and Parking

Primary access to the BESS units would be provided by two driveways off Palomar Road. Secondary access to the Project is provided by a driveway along San Jacinto Road. Access at each driveway is controlled through the use of a 24-foot-wide motorized steel reinforced gate supported by a Knox electronic system with dedicated backup power supply.

A looped system of interior roads provides access to all onsite facilities and equipment. The roads are designed to meet city standards for width, turning radius, load, all weather rating and emergency response access. On-site parking is provided (12 parking stalls) to accommodate remote operations and maintenance (O&M) workers that will periodically visit the site.

Off-Site Road Improvements

The Project includes improvements to frontage roads to provide adequate site access for workers and emergency services. Appendix A provides engineered drawings for the planned off-site roadway improvements which are described below:

Palomar Road

AES would construct the western half of Palomar Road as measured from the roadway centerline to the standards of a "Collector Road." AES would construct the following improvements within a 74-foot right-of-way (ROW):

- Two, 12-foot undivided travel lanes with 10-foot shoulder
- 15-foot pedestrian path

- Curb and gutter
- Bicycle Lane

The roadway segment would extend from the intersection with Case/Matthews Road south to the intersection with McLaughlin Road.

San Jacinto Road

AES would construct the eastern half of San Jacinto Road which is a shared roadway along the western Project boundary. AES in coordination with Calpine would construct the eastern half of the roadway including the following improvements within a 60-foot ROW[4]:

- One, undivided 12-foot travel lane
- 10-foot landscape parkway
- Curb and gutter

The roadway segment would extend from a proposed cul-de-sac south of Case/Mathews Road south to the intersection with McLaughlin Road.

McLaughlin Road

AES would construct a segment of McLaughlin Road to a Rural Road standard and would contain the following elements within a 48-foot ROW:

- Two undivided 14-foot asphalt travel lanes
- 6-foot paved shoulders
- Asphalt dikes for drainage.

The roadway segment would extend from Antelope Road to San Jacinto Road. This extension will offer a reliable, all-weather secondary access route to the site.

Perimeter Wall, Landscaping, Signage, and Lighting

To protect equipment and block direct views into the site, a solid decorative wall—7 feet high—will be built around the edge of the development area. There will be a 25-foot setback outside the fence, where evergreen trees, shrubs, and ground cover (as described in the Landscape Plan, Attachment D) will be planted. Consistent with the City of Menifee Development Code Section 9.297.040, a 1-foot-tall earthen berm will extend along the exterior of the fence line to limit public views of the vertical wall face.

Landscaping with a screening height of up to 60’ will be installed outside of the perimeter wall providing aesthetic screening from public viewpoints (Figure 6: Visual Simulations). Trees will be spaced every 30 feet and come from nursery containers at least 24 inch in size with a minimum of 10% of trees using a nursery container size of 36-inch box. Various trees, shrubs and ground covers will be incorporated to provide visual interest and screening from multiple viewpoints. Interspersed among the trees would be shrubs ranging in height from 3 to 15 feet tall and 3 to 15 feet wide. When mature, the trees will stand between 20 and 60 feet tall, with canopies spanning 20 to 50 feet. Shrubs will be scattered among the trees and will range from 3 to 15 feet wide and tall. The setback area will also

[4] The associated environmental impact was considered as part of the buildout of the City’s circulation network previously evaluated and analyzed in the City’s General Plan EIR that was certified as adequate (SCH# 2012071033).

include 3-foot-wide by 3-foot-tall landscape boulders, cobblestones, and freestanding trellises positioned at regular intervals along the wall. The landscape plan has selected vegetation that is suitable for the climate and soil types at the Project site and prioritizes plants that require low water use.

All planted areas will have automatic irrigation, using low-flow drip lines, bubblers, or low-volume rotating spray systems. The irrigation controller will receive weather data so it can efficiently schedule water for each hydro zone and adjust as needed.

Lighting is planned for the battery storage areas to provide security and help with O&M. All lights will be shielded and aimed at O&M work zones. At the main entrance off Palomar Road, monument signage will mark the entry point. This signage will comply with standards for materials, colors, and size. Additional address signage will be placed at the entrance.

Telecommunications

The Project would include new telecommunication lines that would connect the project to the existing SCE Valley substation and local third-party internet providers. All new telecommunication lines would be located on the overhead transmission line or underground within the gen tie ROW.

Utilities

Storm water runoff will travel via sheet flow to inlets entering the underground system which conveys runoff to the detention and water quality basin along the southern project boundary before ultimately discharged to the adjacent storm water channel. Low flows will enter the water quality BMP for treatment, and high flows will overtop and sheet flow into the detention basin in the southwest corner of the site. Attenuated flows will be discharged into the existing RCFCD channel. Runoff from the newly constructed roadways would be collected and treated separately using one or more of the following methods prior to discharge: a bio-infiltration basin, modular wetland system, or Filterra treatment system.

Offsite runoff that presently travels across the southeastern portion of the site will be intercepted at a newly constructed 24-inch x 24-inch inlet along the northern project boundary and routed around the project site down Palomar Road in an underground drainage system where it is discharged south of the site as under existing condition.

To ensure adequate fire flows at sufficient pressure and duration to meet fire department requirements a new water line would be constructed to serve a fire hydrant near the main driveway off Palomar Road. Water supplied to the project site will be obtained from the Eastern Municipal Water District (EMWD). AES has participated in a preliminary application meeting with EMWD staff who confirmed water was available to serve the project and the property is within a recycled water use zone.

Project operation will not require permanent, on-site personnel and there is no operation and maintenance building planned so the project would not connect to the sanitary sewer system. See Appendix B: Drainage Plan and Appendix C: Water Quality Management Plan.

Project Construction

Schedule

For the purposes of the environmental impacts analysis, construction of the Project is anticipated to begin in April 2024 and last for 12 to 18 months, with commercial operation in 2025.[5] If the Project is built in phases, the construction timeline may be extended.

Construction will occur during daylight hours, Monday through Friday. Weekend and non-daylight work hours may be necessary to make up schedule deficiencies, or to complete critical construction activities. For instance, during hot weather, it may be necessary to start work earlier to avoid pouring concrete during high ambient temperatures. Construction activities will be conducted consistent with City of Menifee regulations regarding hours of construction.

Laydown Yard

During project construction a staging/laydown yard is planned on 4 acres of land found immediately southeast of the project site at APN 331-240-011. The temporary laydown yard would occupy 4 acres of a larger parcel bounded by McLaughlin Road to the north, a developed container storage facility to the east, and similarly undeveloped (and previously farmed) land to the south and west. Access would be taken from Mc Laughlin Road at a point 500 feet east of the intersection with Palomar Road

The laydown yard would serve as the site for storage of equipment and materials used during construction. A temporary, 6-foot chain link fence would secure the yard perimeter, and a portable toilet and handwashing station would be installed as required by California Division of Occupational Safety and Health (Cal/OSHA) health and safety standards. The property is flat, and surface preparation would be limited to placing compacted gravel at the driveway and interior roadway to provide all weather surface for equipment and vehicle access. A 6-foot chain-link fence would be placed around the laydown area to secure the site. All fencing and material placed at the yard would be removed and the site returned to its previous condition upon completion of the construction activity.

Equipment and Material Delivery

Materials and supplies will be delivered to the project site via heavy trucks traveling along the regional highway network (Interstate 215, Interstate 15), and local roadways designated as truck routes (where possible). Most deliveries will involve transport of battery containers, inverters, transformers, substation materials, and concrete or aggregate needed for foundations. These deliveries typically have a maximum load of 50 tons (100,000 pounds), with most cargo averaging around 25 tons (50,000 pounds). The largest delivery will be the step-up transformer, which may weigh close to 160,000 pounds. Project personnel will also use these routes daily during the construction phase.

Site Preparation and Grading

The grading concept calls for elevating the northern portion of the site near the intersection of San Jacinto Road and Russel Road to limit views of the Project from public vantage points and to direct stormwater runoff flows to the south. On-site soil would be cleared and grubbed of vegetation before the top 48 inches is excavated,

[5] The analysis assumes a construction start date of April 2024, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

moistened, and recompacted. Upon completion of remedial grading, fine grading would be conducted to create development pads, establish access roads, and construct a water quality/detention basin. Permanent cut slopes would be constructed at a slope angle ratio not exceeding 3:1 (horizontal: vertical) around site perimeter.

Excavation and rough grading will involve the removal, storage, and disposal of earth, sand, gravel, vegetation, organic and deleterious substances, loose rock, boulders, and other debris, consistent with the recommendations of the geotechnical report. Materials deemed suitable for backfill will be stockpiled in small quantities at assigned locations. In the event of encountering contaminated materials during excavation, all removal and disposal procedures will adhere strictly to relevant federal, state, and local regulations.

Earthwork volume during the grading phase of the project is estimated to be 37,743 cubic yards of cut and 38,336 cubic yards of fill. A total of 593 cubic yards of soil would be exported from the site requiring 30 heavy truck trips. See Appendix A for the grading plan.

Equipment Installation

After rough grading has been conducted all necessary below-grade construction—installation of structure and equipment foundations, underground ducts, and the ground grid—would begin. Once earthwork and below-grade activities have been completed, above-grade construction and equipment installation would take place. The enclosure would be erected, and major equipment and structures would be installed and anchored on their respective foundations. Major electrical and terminal equipment, such as the converter transformers, would be delivered to the terminal site and placed directly on foundations.

Other equipment, such riser structures, bus, conduit, cable trench, and rebar, would be received and temporarily stored at a staging area before installation. After construction, temporary disturbance areas would be recontoured to match pre-construction grades.

Tower Foundation Installation

To install foundations to support the gen tie towers, a truck- or track-mounted excavators or drill rigs will dig holes for each steel substation termination structure. These holes will measure between 5 and 10 feet in diameter and reach depths of 15 to 30 feet. Each foundation will require the excavation and removal of about 15 to 130 cubic yards of material from the site, which will then be replaced by an equivalent amount of concrete.

After excavation, a reinforced steel cage along with anchor bolts will be positioned inside each hole before being backfilled with concrete. Concrete forms at the surface help achieve the required pier height above ground level. When fully cured, the steel substation termination structure is fastened to the foundation using the embedded anchor bolts.

Tower Structure Delivery and Assembly

Steel substation termination structures will be delivered to each designated temporary work pad in multiple segments via flatbed trucks. Depending on construction conditions, assembly may occur either at ground level or through aerial framing methods. For ground assembly, a small crane or forklift will position the structure segments, which will then be connected using hydraulic jacks—if they fit together by slipping—or secured with bolts. Upon completion of ground assembly, a large crane will lift the entire assembled structure onto the anchor bolts extending from the drilled pier foundation.

Once the structures are installed, insulators, hardware, and stringing sheaves will be delivered to each site. The structures will then be equipped with insulator strings and stringing sheaves at all designated ground wire and conductor positions.

Pilot lines will be drawn from one structure to the next, passing through the stringing sheaves at each location. Afterward, a larger, more robust line will be connected to the conductors to enable installation onto the structures. This procedure will be repeated as necessary until the ground wire or conductor is threaded through all sheaves.

The shield wire and conductors will be strung utilizing powered pulling equipment at one end and powered braking or tensioning equipment at the opposite end of each segment. Tensioning and pulling equipment sites may be spaced up to 2 miles apart, with this distance potentially doubled when it is practical to pull two sets of conductors consecutively.

Project Operations

Daily operations, monitoring, and dispatching would occur remotely, so no occupied structures are proposed as part of the Project. O&M staff (8 to 12 people) would visit the site every weekday, Monday through Friday, to conduct routine inspection and maintenance of the facilities. The O&M staff would be housed at an off-site location centrally located to multiple AES facilities in the region. Approximately 24 vehicle trips per workday[6] would be generated during ongoing operations assuming each employee represents a single occupancy vehicle trip to and from the site.

During operations, small quantities of hazardous materials may be stored on-site for maintenance purposes. The facility must maintain inventory logs (e.g., safety data sheets), store hazardous material in secure areas, and dispose of hazardous waste using professional services or at appropriate facilities, as required by State regulations. Because each of the substation transformers would contain mineral oil, the substation would be designed to accommodate an accidental spill of transformer fluid using containment-style mounting.

Decommissioning

The Project is anticipated to have a lifespan of approximately 30 years. At the end of the Project life, most of the Project's electrical equipment (breakers, transformers, inverters) would be deenergized prior to removal and recycled to the extent feasible or disposed of at an appropriately licensed disposal facility. The batteries would be returned to the battery manufacturer for recycling. Equipment foundations and pads would be demolished and removed.

AES will submit a Decommissioning Plan to the City of Menifee for review and approval prior to decommissioning activities.

Interconnection Upgrades

To facilitate the interconnection of the project, reliability network upgrades will be required at the SCE Valley substation. These upgrades are necessary to ensure the substation can accept the project's interconnection and operate safely and efficiently. Planned improvements include.

1. Transmission work:
    a. Install a new 500 kV generation-tie line from Valley Substation to the Customer's Point of Change of Ownership (POCO).
        i. Install one 500 kV steel structure approximately 160 feet high serving as the POCO.

[6] Assumes 260 working days in one calendar year.

ii. Install approximately 723 linear feet of overhead conductors from the POCO to a new 500 kV switch rack in Valley Substation.

2. Valley Substation work:
   a. Install facilities for a new 500 kV switch rack position to terminate the generation-tie line:
      i. One 500 kV dead-end switchyard structure, approximately 133 feet high.
      ii. Three 500 kV voltage transformers.
      iii. Three 500 kV line drops.
   b. Install one 500 kV line position which includes the following equipment:
      i. Two 500 kV circuit breakers.
      ii. Twelve 500 kV disconnect switches.
3. Telecommunications work:
   a. Install three new underground fiber optic paths, each path consisting of:
      i. Approximately 3,280 feet of underground conduits.
      ii. Eight approximate 4-foot by 6-foot manholes.

According to Article XII of the Constitution of the State of California, the California Public Utilities Commission (CPUC) is responsible for regulating investor-owned public utilities. The CPUC holds preemptive jurisdiction over the construction, operation, and maintenance of facilities owned by SCE within California.[7] As a result, local discretionary use permits are not required for the substation modifications related to this project. The CPUC is also accountable for ensuring compliance with all applicable environmental laws, as outlined under General Order 131-E (GO 131-E).

2.5 Project Objectives

Project objectives are as follows:

- Construct and operate a battery energy storage facility to help California advance its Renewable Portfolio Standard and energy storage goals,
- Provide long-duration storage capability to Load Service Entities that will count towards their state-mandated procurement targets,
- Utilize vacant land near existing infrastructure to minimize impacts to sensitive natural resources and land uses.

2.6 Other Project Approvals

In addition to the Conditional Use Permit issued under the permitting authority of the City of Menifee, the project would be required to obtain several other permits or approvals from federal, state, and local agencies. **Table 2-1**, *Anticipated Permits and Approvals*, lists those permits, approvals, and/or licenses that the Project may be required

[7] CPUC GO 131-D, Section XIV.B, states that: *Local jurisdictions acting pursuant to local authority are preempted from regulating electrical power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction.*

to obtain from responsible and trustee agencies. The Project would obtain any other regulatory approvals required by law.

Table 2-1 Other Permits and Approvals

Agency	Permits/Approvals	Trigger	Process	Timing
City of Menifee	Building/Electrical Permit	Required for any new structure that will house the BESS	Submit application for review.	Prior to construction
City of Menifee	Grading Permit	At the time earth movement is proposed	Submit application for review.	Prior to construction
City of Menifee	Encroachment Permit	Construction within public roads or ROWs	Submit application for review.	Prior to construction on or near City ROW
City of Menifee	Fire Department Approval	Required to address questions about testing, installation location, risks, and preventative approaches for BESS	Submittal of an HMA to City Fire.	Prior to CUP approval
City of Menifee	Haul Route Permit	Transport of heavy loads on local roadways	Submit application for review	Prior to transportation of heavy loads
Metrolink	Encroachment Permit	Construction activity in the railroad ROW	Submit application for review.	Prior to construction or near ROW
Riverside County Flood Control District	Encroachment Permit	Construction in ROW	Submit application for review	Prior to construction on or near ROW
State Water Resources Control Board and Regional Water Quality Control Board	Clean Water Act, National Pollutant Discharge Elimination System General Permit	Stormwater discharges associated with construction activities that disturb more than One acre of land.	Prepare SWPPP and submit Notice of Intent with the State Water Board	Prior to construction
Federal Aviation Administration	Code of Federal Regulations Title 14, Part 77 Notification	Construction of overhead facilities potentially requiring aerial lighting or marking.	Submit notification. (FAA Form 7460-1) to FAA.	Prior to construction
California Department of Transportation	Single Trip Transportation Permit	Transporting Heavy or Oversize Loads on State Highways	Submit application for review	Prior to transport of heavy loads
Habitat Conservation Authority	Consistency Determination with HCP (ITP coverage)	Land development within the boundary of the planning area	Submit application package	Prior to construction

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3 Initial Study Checklist

1. **Project title:**

   Double Butte Storage Project

2. **Lead agency name and address:**

   City of Menifee, Community Development Department
   29844 Haun Road
   Menifee, California 92586

3. **Contact person and phone number:**

   Ryan Fowler, Principal Planner
   951.723.3740

4. **Project location:**

   The Project is located on approximately 27 acres of vacant land in the City of Menifee. The site is located to the west of the intersection of Case/Matthews Road and Palomar Road.

5. **Project sponsor's name and address:**

   AES Clean Energy, LLC
   Ken Koch, Project Manager
   2180 South 1300 East, Suite 600
   Salt Lake City, Utah 84106

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

   In accordance with Assembly Bill (AB) 52, tribal consultation for the Project has been initiated by the City with two tribes requesting consultation. The Pechanga Band of Luiseño and Soboba Band of Luiseño Indians have requested consulting status. The Soboba Band of Luiseño Indians has requested standard conditions of approval (COAs) be incorporated to ensure the protection of tribal cultural resources (TCRs).

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality

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

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Less than Significant with Mitigation Incorporated," as indicated by the checklist on the following pages.

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

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Less than Significant," as indicated by the checklist on the following pages.

☒ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☒ Cultural Resources	☒ Energy
☒ Geology and Soils	☒ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials

☒ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☒ Noise	☒ Population and Housing	☒ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☒ Utilities and Service Systems	☒ Wildfire	☐ Mandatory Findings of Significance

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "No Impact," as indicated by the checklist on the following pages.

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ 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.

☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ 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.

☐ 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Ryan Fowler — Signature

3/9/2026 — Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would 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 off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (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.
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. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. the significance criteria or threshold, if any, used to evaluate each question; and
    b. the mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS** – Except as provided in Public Resources Code Section 21099, would the project**:**				
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)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Sources: Menifee General Plan (GP); Menifee GP Exhibit C-8, "Scenic Highways"; Menifee GP Draft Environmental Impact Report (EIR); Menifee North Specific Plan; City of Menifee at a Glance; State of California, Department of Transportation, California State Scenic Highway System Map; Riverside County Ordinance No. 655 (Regulating Light Pollution); City of Menifee Ordinance 2009-24 (Dark Sky) (Menifee Municipal Code [MMC] Chapter 6.01); CCR Title 24 Part 1.

Applicable General Plan Policies:

Goal C-6. Scenic highway corridors that are preserved and protected from change which would diminish the aesthetic value of lands adjacent to the designated routes.

Policy C-6.1. Design developments within designated scenic highway corridors to balance the objectives of maintaining scenic resources with accommodating compatible land uses.

Policy C-6.2. Work with federal, state, and county agencies, and citizen groups to ensure compatible development within scenic corridors.

Policy C-6.3. Utilize design and land development strategies to gradually transition graded road slopes into a natural configuration consistent with the topography of the areas within scenic highway corridors.

Policy C-6.4. Incorporate riding, hiking, and bicycle trails and other compatible public recreational facilities within scenic corridors.

Policy C-6.5. Ensure that the design and appearance of new landscaping, structures, equipment, signs, or grading within eligible county scenic highway corridors are compatible with the surrounding scenic setting or environment.

Goal CD-3. Projects, developments, and public spaces that visually enhance the character of the community and are appropriately buffered from dissimilar land uses so that differences in type and intensity do not conflict.

Policy CD-3.1. Preserve positive characteristics and unique features of a site during the design and development of a new project; the relationship to scale and character of adjacent uses should be considered.

Policy CD-3.2. Maintain and incorporate the city's natural amenities, including its hillsides, indigenous vegetation, and rock outcroppings, within proposed projects.

Policy CD-3.3. Minimize visual impacts of public and private facilities and support structures through sensitive site design and construction. This includes but is not limited to: appropriate placement of facilities; undergrounding, where possible; and aesthetic design (e.g., cell tower stealthing).

Policy CD-3.5. Design parking lots and structures to be functionally and visually integrated and connected; off-street parking lots should not dominate the street scene.

Policy CD-3.6. Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.

Policy CD-3.7. Consider including public art at key gateways, major projects, and public gathering places.

Policy CD-3.9. Utilize Crime Prevention through Environmental Design (CPTED) techniques and defensible space design concepts to enhance community safety.

Policy CD-3.10. Employ design strategies and building materials that evoke a sense of quality and permanence.

Policy CD-3.12. Utilize differing but complementary forms of architectural styles and designs that incorporate representative characteristics of a given area. Policy CD-3.14: Provide variations in color, texture, materials, articulation, and architectural treatments. Avoid long expanses of blank, monotonous walls or fences.

Policy CD-3.15. Require property owners to maintain structures and landscaping to high standards of design, health, and safety.

Policy CD-3.16. Avoid use of long, blank walls in industrial developments by breaking them up with vertical and horizontal façade articulation achieved through stamping, colors, materials, modulation, and landscaping.

Policy CD-3.17. Encourage the use of creative landscape design to create visual interest and reduce conflicts between different land uses.

Policy CD-3.19. Design walls and fences that are well integrated in style with adjacent structures and terrain and utilize landscaping and vegetation materials to soften their appearance.

Policy CD-3.20. Avoid the blocking of public views by solid walls.

Policy CD-3.21. Use open space, greenways, recreational lands, and water courses as community separators.

Goal CD-4. Recognize, preserve, and enhance the aesthetic value of the City's enhanced landscape corridors and scenic corridors.

Policy CD-4.1. Create unifying streetscape elements for enhanced landscape streets, including coordinated streetlights, landscaping, public signage, street furniture, and hardscaping.

Policy CD-4.2. Design new and, when necessary, retrofit existing streets to improve walkability, bicycling, and transit integration; strengthen connectivity; and enhance community identity through improvements to the public right-of-way such as sidewalks, street trees, parkways, curbs, street lighting, and street furniture.

Policy CD-4.3. Apply special paving at major intersections and crosswalks along enhanced corridors to create a visual focal point and slow traffic speeds.

Policy CD-4.7. Design new landscaping, structures, equipment, signs, or grading within the scenic corridors for compatibility with the surrounding scenic setting or environment.

Policy CD-4.8. Preserve and enhance view corridors by undergrounding and/or screening new or relocated electric or communication distribution lines, which would be visible from the City's scenic highway corridors.

Policy CD-4.9. Require specialized design review for development along scenic corridors, including but not limited to, building height restrictions, setback requirements, and site-orientation guidelines.

Goal CD-6. Attractive landscaping, lighting, and signage that conveys a positive image of the community.

Policy CD-6.3. Require property owners to maintain the existing landscape on developed nonresidential sites and replace unhealthy or dead landscaping.

Policy CD-6.4. Require that lighting and fixtures be integrated with the design and layout of a project and that they provide a desirable level of security and illumination.

Policy CD-6.5. Limit light leakage and spillage that may interfere with the operations of the Palomar Observatory.

Policy CD-6.6. Encourage the incorporation of lighting into signage design when appropriate in order to minimize glare and light spillage while accentuating the design of the signage.

Policy CD-6.7. Integrate project signage into the architectural design and character of new buildings.

Policy CD-6.8. Discourage the use of flashing, moving, or audible signs.

Significance Analysis and Determination:

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

Less Than Significant Impact. Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. Scenic vistas can be impacted by development

in two ways. First, a structure may be constructed that blocks the views of a vista. Second, the vista itself may be altered (i.e., development on a scenic hillside). Menifee's natural mountainous setting is critical to its overall visual character and provides scenic vistas for the community. Topography and a lack of dense vegetation or urban development offer scenic views throughout the City, including to and from hillside areas. Scenic features include gently sloping alluvial fans, rugged mountains and steep slopes, mountain peaks and ridges, rounded hills with boulder outcrops, farmland, and open space. Scenic vistas provide views of these features from public spaces. Many scenic resources are outside the City limits and beyond the boundary of the Project site. Scenic views from Menifee include the San Jacinto Mountains to the northeast and east, the San Bernardino Mountains to the north, the San Gabriel Mountains to the northwest, and the Santa Ana Mountains to the west and southwest. The Canyon Lake Reservoir is adjacent to the City's western boundary and approximately 6.15 miles southwest of the Project site.

The City of Menifee General Plan Community Design Element identifies Scenic Corridors and Enhanced Landscape Corridors throughout the city in General Plan Exhibit CD-2. Enhanced Landscape Corridors are located along major transportation routes and require landscaping design that provide a cohesive yet differentiated design to reinforce the City's community identity. Scenic corridors help visually frame some of the communities' most distinctive features and are the same as roadways designated Eligible County Scenic Highways. There are three county eligible scenic highways in the city: I-215 from McCall Boulevard south to the city boundary; McCall Boulevard from I-215 on the west to Menifee Road on the east; and Menifee Road from McCall Boulevard north to the city boundary. The Project site is located approximately one-half mile west of Menifee Road, however there are intervening structures between the Project site and the Scenic Corridor limiting the accessibility of the Project site within the viewshed.

Further, the Project site is located in an area with vacant land that does not contain unique or distinctive vegetation or topography that would contribute to a scenic vista. The construction, operation, and maintenance of the 500-MW BESS facility would introduce a new use on-site that would not alter or block views of a scenic vista available from publicly accessible locations. Additionally, improvements at the SCE Valley Substation would be visually consistent with the existing infrastructure within the disturbed footprint of the substation.

The Project site is located within Planning Area 3 of the Menifee North Specific Plan No. 260 and would be designed and constructed in compliance with the development standards of the Menifee North Specific Plan. The Project is consistent with the zoning, GP designation, and specific plan designation. As such, the Project would have a less than significant impact on scenic vistas. Due to having a less than significant impact, no mitigation is required.

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

Less Than Significant Impact. The Project site is adjacent to an eligible state scenic highway, State Route (SR) 74. According to the City of Menifee, Menifee Road is an eligible County Scenic Highway and is located approximately 0.5 miles to the east of the Project site. There is no official State list of County Scenic Highways. SR-74 is an Eligible State Scenic Highway and is located less than one-quarter mile north of the Project site. The Project site is within an urbanized area, land uses surrounding the Project site include the decommissioned IEEC, high voltage transmission lines, a Riverside County Flood Control channel, decommissioned railroad tracks, commercial properties, industrial properties, vacant land, and the SCE Valley Substation. Further, the Project site does not contain significant trees, rock outcroppings, or historic

buildings. As the Project, inclusive of the SCE Valley Substation upgrades, is not located within an officially Designated State Scenic Highway, the Project would have a less than significant impact, and no mitigation would be required.

c) ***In non-urbanized areas, 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. PRC Section 21071 defines an urbanized area as: a) an incorporated city that meets either of the following criteria: 1) has a population of at least 100,000 persons; 2) has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. According to the California Department of Finance, the estimated population of Menifee in January 2022 was 106,627; meeting criterion a-1. This discussion will analyze whether or not the Project would conflict with applicable zoning and other regulations governing scenic quality.

The Project site is designated as Menifee North Specific Plan No. 260 – Planning Area 3; parcels to the east of the Project site are designated as Business Park (BP) and Rail (RX); parcels to the west of the Project site are designated as Menifee North Specific Plan No. 260 – Planning Area 3; the parcels to the south of the Project site are designated as Menifee North Specific Plan No. 260 – Utility Easements, and to the north is designated as Business Park (BP) and Rail (RX).

The City of Menifee Development Code was amended on October 5, 2022, to allow the development of energy storage facilities subject to certain development standards and required findings. Most of the applicable development standards intend to protect the public's viewshed and limit noise intrusion on neighboring properties, as well increase safety for surrounding properties. The applicable development standards include a solid decorative concrete masonry perimeter wall, anti-graffiti coating, perimeter landscaping, and maximum height limits of equipment. Consistent with the City of Menifee development code section 9.297.040, a one-foot-tall earthen berm will extend along the exterior of the fence line to limit public views of the vertical wall face.

The gen-tie line connecting the Project substation to the SCE Valley Substation would be installed overhead. The gen-tie alignment would be approximately 1,500 feet long and would extend from the Project substation directly to the SCE Valley Substation, with average heights approximately 145 feet tall with a maximum height of 195 feet to cross over other gen-tie lines if needed. Final heights and location are subject to change pending final engineering; however, they would be similar to other electrical transmission structures within the SCE Valley Substation and therefore would not substantially degrade the existing visual character along this corridor and impacts would be less than significant.

The Project has incorporated design features as required by Chapter 9.297 and therefore will not conflict with applicable zoning. The new BESS facility will not conflict with development standards, including building height regulations, and the orientation of the new equipment will comply with required setbacks. Figure 4: Conceptual Site Plan shows equipment heights, setbacks and location and orientation of equipment, Figure 5: Preliminary Landscape Plan identifies the placement of landscaping components by species including the characteristics of each plant, and Figure 6: Visual Simulations depicts the existing Project site and illustrations of the Project site with the Project. Additionally, the Project would be compliant

with Title 9, Chapter 9.205 Lighting Standards, of the City of Menifee Development Code (See Figure 7: Preliminary Lighting Plan). The Project's construction-related activities would result in short-term impacts to the area's visual character and quality. Construction activities would require the use of equipment and storage of materials within the Project site. However, construction activities are temporary (12-18 months) and would not result in any permanent visual impact. Therefore, the Project would have a less than significant impact on the site's visual character and its surroundings and no mitigation is required.

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

Less Than Significant Impact. Excessive or inappropriately directed lighting can adversely impact nighttime views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists). Security lighting would be installed throughout the Project site. All lighting would be hooded or shielded and directed down as required by the City of Menifee Development Code, detailed below.

Menifee Municipal Code (MMC) Chapter 6.01 (Dark Sky; Light Pollution) indicates that low-pressure sodium lamps are the preferred illuminating source and that all non-exempt outdoor light fixtures shall be shielded. A maximum of 8,100 total lumens per acre or per parcel if less than 1 acre would be allowed. When lighting is "allowed," it must be fully shielded if feasible and partially shielded in all other cases and must be focused to minimize spill light into the night sky and onto adjacent properties (MMC 6.01.040). The Project would be conditioned that, prior to the issuance of building permits, all new construction which introduces light sources would be required to have shielding or other light pollution limiting characteristics such as hood or lumen restrictions for consistency with MMC Chapter 6.01.

The Menifee GP Community Design Element includes goals that encourage attractive landscaping, lighting, and signage that conveys the community's positive image (Goal CD-6) and that limit light leakage and spillage that may interfere with the Palomar Observatory operations (Goal CD-6.5). Lighting proposed by the Project would be subject to MMC Chapter 6.01 and Menifee GP goals and policies. Accordingly, the Project would have a less than significant impact on interfering with Mt. Palomar Observatory nighttime use which is located approximately 30 miles southeast. The Preliminary Lighting Plan (Figure 7) shows Project lighting would be limited to only lighting needed for safety and security purposes and that all lighting would be shielded and downward facing in compliance with MMC Chapter 6.01 and Menifee GP goals and policies. Further, the City would also review new lighting for conformance with the 2019 California Green Building Standards Code (CALGreen) (CCR Title 24 Part 11) such that only the minimum amount of lighting is used, and no light spillage occurs.

Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building façades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The Project's proposed design does not include the construction of any new surfaces or components that would consist of large reflective surfaces. Therefore, the Project would result in a less than significant impact concerning a new source of substantial light or glare and no mitigation is required.

Improvements at the SCE Valley Substation would be visually similar to existing equipment at the substation and would incorporate SCE design standards for reducing visual impacts. Therefore, light or glare impacts related to infrastructure improvements at the Valley Substation would be less than significant.

Mitigation Measures: No Mitigation is required.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY 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 Dept. 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:				
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 non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), 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 non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Sources: Menifee GP; Menifee GP Draft EIR; Menifee GP Exhibit OSC-5: Agricultural Resources; California Department of Conservation's California Important Farmland Finder.

Applicable General Plan Policies:

Goal OSC-6. High-value agricultural lands available for long-term agricultural production in limited areas of the City.

Policy OSC-6.1. Protect both existing farms and sensitive uses around them as agricultural acres transition to more developed land uses.

Significance Analysis and Determination:

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 non-agricultural use?

No Impact. The Project site falls within the North Menifee Specific Plan - Planning Area 3 (Industrial). Neither the Menifee GP nor the California Department of Conservation's California Important Farmland Finder designate the Project site Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and therefore the Project would not convert such farmland to non-agricultural uses. As such, the Project would have no impact in regard to farmland conversion and no mitigation would be required.

Proposed improvements to the SCE Valley Substation are anticipated to occur within areas previously disturbed and already occupied by existing facilities. They would not result in impacts to Farmland, and no impact would occur.

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

No Impact. The Project site falls under the Menifee North Specific Plan zoning and is presently undeveloped. The Project site is not subject to a Williamson Act Contract and is not zoned for agricultural or forestland use. As a result, there would be no impact in terms of zoning for agricultural use or Williamson Act contracts. Therefore, the Project would not conflict with existing zoning for agricultural use or an existing Williamson Act Land Use contract, and no impact would occur.

Proposed improvements to the SCE Valley Substation are anticipated to occur within areas previously disturbed and already occupied by existing facilities. They would not result in impacts to land with zoning for agricultural uses, a designated Agricultural Resource Area, or a Williamson Act Contract. As such, no impacts would occur.

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 falls under the Menifee North Specific Plan zoning and is currently undeveloped. The Project site, nor surrounding properties, are not zoned for agricultural, forestland, or timberland use. Consequently, there would be no conflict with existing zoning for such land, nor would it trigger a need for rezoning, and therefore no impacts would occur.

Improvements to the SCE Valley Substation are anticipated to occur within the existing SCE Valley Substation footprint which is not designated forest land or timberland. No impacts would occur.

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 and the adjacent properties are presently not under forest land management or utilized for forest land purposes. Consequently, the Project would neither result in forest land loss nor its conversion to non-forest use, and therefore no impact would occur.

Improvements to the SCE Valley Substation are anticipated to occur within the existing SCE Valley Substation footprint, which is not designated forest land or timberland. No impacts would occur.

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 non-agricultural use or conversion of forest land to non-forest use?

No Impact. The surrounding land uses in close proximity to the Project site include the decommissioned IEEC, high voltage transmission lines, a Riverside County Flood Control channel, decommissioned railroad tracks, commercial properties, industrial properties, vacant land, and the SCE Valley Substation. The zoning of adjacent areas to the east of the Project site is designated as Business Park, while parcels to the west are designated as Menifee North Specific Plan No. 260 – Planning Area 3. To the south of the Project site, parcels are designated as Menifee North Specific Plan, and to the north as Railroad and Business Park. Forest lands are not found in the vicinity of the Project site. As per the GP and aerial imagery (Figure 3), the Project site and its surrounding land are not presently utilized for agricultural purposes. The Project would not subdivide any agricultural parcels or hinder access to them. Consequently, the Project would not indirectly lead to the conversion of farmland to non-agricultural use, resulting in no impact.

Improvements to the SCE Valley Substation are anticipated to occur within areas previously disturbed and already occupied by existing facilities. The substation improvements would result from the interconnection needs of the Project that would not, in and of themselves, result in impacts to agricultural land, or result in a conversion from agricultural uses to non-agricultural uses not. No impacts would occur.

Mitigation Measures: No Mitigation is required

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the 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?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Sources: Menifee GP; Menifee GP Draft EIR.

Applicable General Plan Policies:

Goal OSC-9. Reduced impacts to air quality at the local level by minimizing pollution and particulate matter.

Policy OSC-9.1. Meet state and federal clean air standards by minimizing particulate matter emissions from construction activities.

Policy OSC-9.2. Buffer sensitive land uses, such as residences, schools, care facilities, and recreation areas from major air pollutant emission sources, including freeways, manufacturing, hazardous materials storage, wastewater treatment, and similar uses.

Policy OSC-9.3. Comply with regional, state, and federal standards and programs for control of all airborne pollutants and noxious odors, regardless of source.

Policy OSC-9.4. Support the Riverside County Regional Air Quality Task Force, the Southern California Association of Government's Regional Transportation Plan/Sustainable Communities Strategy, and the South Coast Air Quality Management District's Air Quality Management Plan to reduce air pollution at the regional level.

Policy OSC-9.5. Comply with the mandatory requirements of Title 24 Part 11 of the California Building Standards Code (CALGreen) and Title 24 Part 6 Building and Energy Efficiency Standards.

Significance Analysis and Determination:

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

Less-than-Significant Impact. The Project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

SCAQMD administers SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS).[8] Criteria air pollutants identified by these air quality

[8] These standards for the maximum level of criteria air pollutants that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by the EPA and CARB, respectively.

standards include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide, particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

The 2022 AQMP (SCAQMD 2022) was adopted by the SCAQMD Governing Board in December 2022. The SCAQMD 2022 AQMP was developed to address the attainment of the 2015 national 8-hour O_3 ambient air quality standard (70 parts per billion) for the SCAB and Coachella Valley. The 2022 AQMP provides actions, strategies, and steps needed to reduce air pollutant emissions and meet the O_3 standard by 2037 (SCAQMD 2022).

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the 2022 AQMP and if it would interfere with the region's ability to comply with federal and state air quality standards. SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- **Consistency Criterion No. 2:** Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, Project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix D-1: Air Quality Technical Memorandum. As presented in Section 3.3(b), the Project would not generate construction or operational criteria air pollutant emissions that exceed the SCAQMD's thresholds, and the Project would therefore be consistent with Criterion No. 1.

The second criterion regarding the potential of the Project to exceed the assumptions in the AQMP or increments based on the year of Project buildout and phase is primarily assessed by determining consistency between the Project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (SCAQMD 1993). SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by Southern California Association of Governments (SCAG) for its 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2020). SCAQMD uses this document, which is based on general plans for cities and counties in the SCAB, to develop the AQMP emissions inventory (SCAQMD 2022). The SCAG RTP/SCS and associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans.

The Project site has a zoning designation of Specific Plan (Menifee Specific Plan No. 260) that allows industrial uses including BESS and public utility substations. The Project is consistent with the existing land use designation and does not propose a change in land use designation. In addition, the implementation of the Project would not generate an increase in growth demographics that would conflict with existing

projections within the region. Accordingly, the Project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development.

In summary, based on the considerations presented for the two criteria, impacts relating to the Project's potential to conflict with or obstruct implementation of the applicable AQMP would be less than significant and no mitigation would be required.

Emissions related to the SCE Valley Substation improvements would be minimal compared to construction of the Project as a whole. Operation of the power line connection and communications relays would not result in the generation of emissions, and maintenance of the power line connection and communications relays would result in negligible emissions associated with periodic inspections. SCE would also implement Best Management Practices (BMPs) and comply with all applicable federal and state laws and regulations during construction and operation, including those regulations that relate to the protection of air quality. These improvements would result in less-than-significant impacts to air quality and substantial pollution concentrations.

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 with Mitigation Incorporated. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, Project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would represent a cumulatively considerable contribution to a significant cumulative air quality impact. If a project's emissions exceed the SCAQMD significance thresholds for a criteria pollutant which the basin is in non-attainment, those emissions would be as cumulatively considerable. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to contribute toward a cumulatively significant air quality impact (SCAQMD 2003a).

A quantitative analysis was conducted to determine whether the Project might result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS or cumulatively contribute to existing nonattainment of ambient air quality standards. Pollutants that are evaluated herein include VOCs and NO_x, which are important because they are precursors to O_3, as well as CO, SO_x, PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[9] the SCAB is designated as a nonattainment area for federal and state O_3 and $PM_{2.5}$ standards (CARB 2022; EPA 2023a). The SCAB is also designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO and NO_2 standards, as well as for state sulfur dioxide standards. Although the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.[10]

[9] An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.

[10] Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

The Project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. The SCAQMD CEQA Air Quality Significance Thresholds, as revised in March 2023, set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would indicate the potential for a project to contribute to violations of the NAAQS or CAAQS. Table 3.3-1 lists the revised SCAQMD Air Quality Significance Thresholds (SCAQMD 2023a).

Table 3.3-1. South Coast Air Quality Management District Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	**Construction (Pounds per Day)**	**Operation (Pounds per Day)**
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
TACs and Odor Thresholds		
TACs[b]	Maximum incremental cancer risk ≥10 in 1 million Cancer Burden >0.5 excess cancer cases (in areas ≥1 in 1 million) Chronic and acute hazard index ≥1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2023a. **Source:** SCAQMD 2023a.
Notes: VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; TAC = toxic air contaminant; SCAQMD = South Coast Air Quality Management District.
Greenhouse gas (GHG) emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not include included in this table as they are addressed within the GHG emissions analysis and not the air quality analysis.

[a] The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

[b] TACs include carcinogens and noncarcinogens.

The Project would contribute a cumulatively considerable net increase of O_3, which is a nonattainment pollutant, if the Project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 3.3-1. These emission-based thresholds for O_3 precursors are intended to serve as a surrogate for an O_3 significance threshold (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (i.e., VOCs and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods.

Construction Emissions

The California Emissions Estimator Model (CalEEMod) Version 2022.1. was used to estimate emissions from construction and operation of the Project.[11] The following discussion quantitatively evaluates Project-generated construction and operational emissions and impacts that would result from implementation of the Project. CalEEMod input parameters, including the land use type used to represent the Project and its size, construction schedule, and anticipated use of construction equipment, were based on information provided by the applicant or default model assumptions if Project specifics were unavailable.

Construction was assumed to commence in April 2024 and last approximately 12 months.[12] The first year of operation was assumed to be 2025. For the analysis, it was generally assumed that heavy construction equipment would be operating at the site for up to 8 hours per day (depending on phase), 5 days per week (22 days per month), during Project construction. In addition to construction equipment operation, emissions from worker trips and vendor trucks (i.e., delivery trucks) were estimated based on CalEEMod defaults. For decommissioning, it is anticipated that with a 30-year lifespan decommissioning would occur in 2055, the CARB EMFAC within CalEEMod only provides emission factors through 2050. As such, year 2050 was assumed for modeling for decommissioning. Vendor trucks transporting building materials were assumed for building construction. The Project would include 37,743 cubic yards of cut and 38,336 cubic years of fill, resulting in a necessary 593 cubic yards of export during the grading phase. The analysis contained herein is based on the following subset area schedule assumptions (duration of phases is approximate and construction phases may overlap):

- Site Preparation – 1.5 months
- Grading – 1.5 months
- Collector Substation Installation – 8 months
- Battery/Container Installation – 8 months
- Gen-tie Foundation and Tower Erection – 5 months
- Gen-tie Stringing and Pulling – 1 month
- SCE Valley Substation Interconnection Facility Upgrades – 12 months
- Decommissioning – 6 months (year 2055)

Average daily emissions were computed by dividing the total construction emissions by the number of active construction days. The construction equipment mix and estimated hours of equipment operation per day used for the air emissions modeling of the Project are based on CalEEMod defaults and are shown in Table 3.3-2.

11 CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects.

12 The analysis assumes a construction start date of April 2024, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 3.3-2: Double Butte Battery Energy Storage Project - Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Site Preparation	40	0	0	Graders	2	8
				Rubber-Tired Loaders	2	8
				Skid Steer Loaders	2	8
				Tractors/Loaders/ Backhoes	2	8
Grading	40	0	369	Graders	2	8
				Plate Compactors	2	8
				Rollers	2	8
				Rubber-Tired Loaders	2	8
				Skid Steer Loaders	2	8
				Tractors/Loaders/ Backhoes	2	8
Battery/Container Installation	40	20	4	Air Compressors	4	8
				Cranes	2	8
				Excavators	2	8
				Generator Sets	4	8
				Plate Compactors	2	8
				Rollers	2	8
				Rough Terrain Forklifts	2	8
				Skid Steer Loaders	2	8
				Tractors/Loaders/ Backhoes	2	8
Collector Substation Installation	40	20	0	Aerial Lifts	6	8
				Air Compressors	2	8
				Bore/Drill Rigs	2	8
				Cranes	2	8
				Excavators	2	8
				Generator Sets	2	8
				Rollers	2	8
				Rough Terrain Forklifts	2	8
				Rubber-Tired Dozers	2	8
				Skid Steer Loaders	2	8
				Tractors/Loaders/ Backhoes	4	8
				Trenchers	4	8
SCE Valley Substation	40	20	0	Aerial Lifts	6	8
				Air Compressors	2	8

Table 3.3-2: Double Butte Battery Energy Storage Project - Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Interconnection Facility Upgrades				Bore/Drill Rigs	2	8
				Cranes	2	8
				Excavators	2	8
				Generator Sets	2	8
				Rollers	2	8
				Rough Terrain Forklifts	2	8
				Rubber-Tired Dozers	2	8
				Skid Steer Loaders	2	8
				Tractors/Loaders/ Backhoes	4	8
				Trenchers	4	8
Gen-tie foundation and tower erection	10	2	0	Air Compressors	2	8
				Cranes	2	8
				Forklifts	2	8
				Generator Sets	2	8
				Pumps	2	8
Gen-tie stringing and pulling	8	2	0	Forklifts	2	8
				Generator Sets	2	8
				Tractors/Loaders/ Backhoes	2	8
Decommissioning	40	2	2,640	Concrete/Industrial Saws	2	8
				Cranes	2	8
				Rubber-Tired Dozers	2	8
				Tractors/Loaders/ Backhoes	2	8
Access Road construction	20	20	100	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
				Cement and Mortar Mixers	2	8
				Tractors/Loaders/ Backhoes	2	8

Note: See Appendix D for details.

Emissions generated during construction (and operation) of the Project are subject to the rules and regulations of the SCAQMD. Rule 403, Fugitive Dust, requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. It was assumed that the active sites would be watered at least two times daily in compliance with requirements of SCAQMD standard dust control measures in Rule 403.

Table 3.3-3 shows the estimated maximum daily construction emissions associated with the construction phase of the Project prior to mitigation being applied.

Table 3.3-3. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day					
2024	18.95	169.85	188.25	0.32	9.37	6.79
2025	16.92	154.02	180.78	0.32	8.02	5.79
2055	1.59	9.71	15.83	0.02	4.34	2.26
Maximum Emissions	**18.95**	**169.85**	**188.25**	**0.32**	**9.37**	**6.79**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**YES**	**No**	**No**	**No**	**No**

Source: Appendix D-1.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
These estimates reflect control of fugitive dust required by SCAQMD Rule 403.

As shown in Table 3.3-3, daily construction emissions exceed SCAQMD's daily thresholds for NO_x emissions. Therefore, criteria air pollutant emissions generated by the Project would create a potentially significant impact, and mitigation would be required. **Mitigation measure AQ-1** (**MM-AQ-1**) would be required to reduce impacts related to NO_x emissions during construction of the Project.

Implementation of **MM-AQ-1** would reduce Project construction-generated NO_x emissions to the extent feasible. The criteria air pollutant emissions after incorporation of **MM-AQ-1** are presented in Table 3.3-4.

Table 3.3-4. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions - mitigated

Year	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
	pounds per day					
2024	5.91	66.86	201.31	0.32	3.75	1.66
2025	5.40	64.72	197.30	0.31	3.38	1.57
2055	0.53	4.60	27.48	0.05	4.19	2.13
Maximum Emissions	***5.91***	***66.86***	***201.31***	***0.32***	***3.75***	***1.66***
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District. Emissions include compliance with SCAQMD Rule 403.
See Attachment A for complete results.

As shown in Table 3.3-4, daily emissions with application of mitigation measure **MM-AQ-1** would fall below SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during Project construction, and short-term construction impacts would be less than significant with mitigation.

Operational Emissions

Emissions from the operational phase of the Project were estimated using CalEEMod 2022.1. Operational year 2025 was assumed following completion of construction.

Area Sources

The area source category calculates direct sources of air pollutant emissions located at the Project site, including consumer product use and landscape maintenance equipment. CalEEMod defaults were used to estimate emissions from area sources during operation of the Project.

Consumer products are various solvents used in non-industrial applications which emit VOCs during their product use, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Consumer product VOC emissions are estimated in CalEEMod based on the floor area of buildings and on the default factor of pounds of VOC per building square foot per day. The CalEEMod default utilization rates and emission factors were assumed.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers, as well as air compressors, generators, and pumps. The emissions associated from landscape equipment use were estimated using CalEEMod. The emission factors are multiplied by the number of summer days that represent the number of operational days.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for greenhouse gases (GHGs) in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site. The Project does not include the use of natural gas during operation. Therefore, no emissions associated with energy sources were quantified for the air quality analysis. The auxiliary energy use associated with the Project was provided by the Applicant and estimated to be 17,905 megawatt-hours per year.

Offroad Equipment Sources

During irregular maintenance, the Project may require the movement or replacement of battery enclosures during the lifetime of the Project. As such, the use of a crane was assumed to assist the lifting and movement of the BESS containers. CalEEMod was used to estimate emissions of the crane assuming 1 day of operation every 5 years.

Mobile Sources

Following the completion of construction activities, the Project would generate criteria pollutant emissions from mobile sources (vehicular traffic) as a result of the periodic maintenance of the Project. The Project was assumed to require up to 12 employees visiting the site for maintenance five days per week per. The estimated trip lengths and trip modes were based on CalEEMod defaults. CalEEMod was used to estimate emissions from proposed vehicular sources (refer to Attachment A). CalEEMod default data, including

temperature, trip characteristics, variable start information, emissions factors, and trip distances, were conservatively used for the model inputs. Project-related traffic was assumed to include a mixture of vehicles in accordance with the associated use, as modeled within CalEEMod, which is based on the CARB EMFAC2021 model. Emission factors representing the vehicle mix and emissions for 2025 were used to estimate emissions associated with vehicular sources.

Stationary Sources

The Project will install one emergency Diesel generator (260 horsepower) for emergency safety systems during a power outage that lasts longer than 24-48 hours. This 24-hour window would provide operations personnel enough time to safely de-energize and isolate equipment during operation. CalEEMod was used to estimate criteria air pollutant emissions of the generator assuming 1 hour per day and 50 hours per year for maintenance and testing.

Table 3.3-5 presents the maximum daily emissions associated with operation of the project in 2025 at buildout. The values shown are the maximum summer and winter daily emissions results from CalEEMod. Complete details of the emissions calculations are provided in Appendix D-1.

Table 3.3-5. Estimated Maximum Daily Operation Criteria Air Pollutant Emissions

Emissions Source	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	<0.01	0.00	0.00	0.00	0.00	<0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.14	0.03	0.23	<0.01	<0.01	<0.01
Offroad	0.23	2.20	2.08	0.01	0.09	0.09
Stationary	0.43	1.19	1.09	0.00	0.06	0.06
Total	***0.79***	***3.43***	***3.40***	***<0.01***	***0.16***	***0.15***
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Attachment A for complete results. Columns may not add due to rounding.

As shown in Table 3.3-5, the Project would not exceed SCAQMD's significance thresholds during operations. Therefore, operational impacts associated with criteria air pollutant emissions would be less than significant.

As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. However, as indicated in Tables 3.3-4 and 3.3-5, Project-generated construction and operational emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM_{10}, or $PM_{2.5}$ after mitigation.

Cumulative localized impacts would potentially occur if a project were to occur concurrently with another off-site project. However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD.

Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all sites in the SCAQMD. Additionally, cumulative VOC emissions would be reduced because all future projects would be subject to VOC regulation regarding the VOC content of the surface coatings. SCAQMD's Rule 1113, Architectural Coatings, governs the VOC content for interior and exterior coatings.

Therefore, the Project, inclusive of improvements to the SCE Valley Substation, would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during construction and operation.

Health Effects of Criteria Air Pollutants

Health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2021). VOCs and NO_x are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 ambient air quality standards tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative because of the lack of quantitative methods to assess this impact. Because construction and operation of the Project would not result in O_3 precursor emissions (i.e., VOCs or NO_X) that would exceed the SCAQMD thresholds, as shown in Tables 3.3-4 and 3.3-5, the Project is not anticipated to substantially contribute to regional O_3 concentrations and their associated health impacts.

Health effects associated with NO_x include lung irritation and enhanced allergic responses (CARB 2021). Construction and operation of the Project would not generate NO_x emissions that would exceed the SCAQMD mass daily thresholds; therefore, construction and operation of the Project is not anticipated to contribute to exceedances of the NAAQS and CAAQS for NO_2 or contribute to associated health effects. In addition, the SCAB is designated as in attainment of the NAAQS and CAAQS for NO_2, and the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2021). CO tends to be a localized impact associated with congested intersections. Although CO hotspots are discussed in more detail below (Section 3.3 (c)) projects contributing to adverse traffic impacts may result in the formation of CO hotspots. O&M staff would generate approximately 24 vehicle trips per workday which would be well under the level that would result in CO hotspots at any study intersection and therefore the Project would not create a CO hotspot during operation. Thus, the Project's CO emissions would not contribute to the health effects associated with this pollutant.

Health effects associated with PM_{10} and $PM_{2.5}$ include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2021). As with O_3 and NO_X, and as shown in Tables 3.3-4 and 3.3-5, the Project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. Accordingly, the Project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause an increase in related health effects for this pollutant.

Therefore, impacts related to health effects from criteria air pollutants would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated. The Project would not expose sensitive receptors to substantial pollutant concentrations, as evaluated below.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include sites such as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The nearest sensitive-receptor land use (a residence) is located north of the project site across Case/Matthews Road and California SR-74, approximately 920 feet from the Project Site boundary.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the Project as a result of Project activities. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2009). The Project Site is located in State Responsibility Area 24 (Northwest San Bernardino Valley). LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances. In accordance with the SCAQMD *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* (SCAQMD 2009), the Project would disturb a maximum of 2 acres during the grading phase. Residential land uses are located to the north and southwest of the Project. The nearest sensitive-receptor land use (a residence) is located north of the project site across Case/Matthews Road and California SR-74, approximately 920 feet from the Project Site boundary. As such, the LST receptor distance was assumed to be 656 feet (200 meters), the nearest threshold for which SCAQMD provides LST threshold values.

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with off-road equipment exhaust and fugitive dust generation. According to the Final Localized Significance Threshold Methodology, "off-site mobile emissions from the Project should not be included in the emissions compared to the LSTs" (SCAQMD 2009). Trucks and worker trips associated with the Project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets. Off-site emissions from truck trips were limited to 1,000 feet of estimated on-site activity within the LST analysis. The maximum daily on-site emissions generated by construction of the Project in each construction year are presented in Table 3.3-6 and compared to the SCAQMD localized significance criteria for Source-Receptor Area 24 to determine whether Project-generated on-site emissions would result in potential LST impacts.

Table3.3-6. Localized Significance Thresholds Analysis for Project Construction

Pollutant	Project Construction Emissions (Pounds per Day)	LST Criteria (Pounds per Day)	Exceeds LST?
NO_2	169.84	379	No
CO	188.25	5,136	No
PM_{10}	9.37	75	No
$PM_{2.5}$	6.79	23	No

Source: SCAQMD 2009.
Notes: LST = localized significance threshold; NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
See Appendix D-2 for detailed results.
LSTs are shown for 2-acre Project sites corresponding to a distance to a sensitive receptor of 200 meters (656 feet) for SRA 24.
These estimates reflect control of fugitive dust required by Rule 403.
The emissions represent worst-case operating scenario during construction.

As shown in Table 3.3-6, the Project LST would not exceed the established significance thresholds, and thus, would result in a less than significant localized impact to sensitive receptors during construction.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited and disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a Project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

Title 40 of the Code of Federal Regulations, Section 93.123(c)(5), Procedures for Determining Localized CO, PM_{10}, and $PM_{2.5}$ Concentrations (Hot-Spot Analysis), states that "CO, PM_{10}, and $PM_{2.5}$ hot-spot analyses are not required to consider construction-related activities, which cause temporary increases in emissions. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site" (40 CFR 93.123). While Project construction would involve on-road vehicle trips from trucks and workers during construction, construction activities would last approximately 12 months and would not require a Project-level construction hotspot analysis.

Mobile source impacts occur on two scales of motion. Regionally, Project-related travel would add to regional trip generation and increase the vehicle miles traveled (VMT) within the local airshed and the SCAB. Locally, Project-generated traffic would be added to the City's roadway system near the Project Site. If such traffic occurs during periods of poor atmospheric ventilation, is composed of many vehicles cold-started and operating at pollution-inefficient speeds or is operating on roadways already crowded with non-Project traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of continued improvement in vehicular

emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

Projects contributing to adverse traffic impacts may result in the formation of CO hotspots. As the Project would only generate 24 trips per day during periodic maintenance, the Project would not create a CO hotspot during operation.

Accordingly, the Project would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the Project, inclusive of improvements to the SCE Valley Substation, would result in a less than significant impact to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

In addition to impacts from criteria pollutants, certain projects may include emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or hazardous air pollutants. State law has established the framework for California's TAC identification and control project, which is generally more stringent than the federal project, and is aimed at TACs that are a problem in California. The state has formally identified more than 200 substances as TACs, including the federal hazardous air pollutants, and is adopting appropriate control measures for sources of these TACs.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Some TACs increase noncancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index (HIC) is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The HIC estimates for all receptor types used the Office of Environmental Health Hazard Assessment–derived calculation method, which uses high end exposure parameters for the inhalation and next top two exposure pathways and mean exposure parameters for the remaining pathways for non-cancer risk estimates. The HIC is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system.[13] A hazard index less than 1.0 means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant. The SCAQMD recommends a HIC significance threshold of 1.0 (project increment) and an acute hazard index of 1.0.

A health risk assessment was performed for construction of the Project. Please see Appendix D-2 for health risk assessment methodology details. The greatest potential for TAC exposure from Project construction is

[13] The HIC estimates for all receptor types used the Office of Environmental Health Hazard Assessment–derived calculation method (OEHHA 2015).

from diesel particulate matter, as the exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. Diesel particulate matter has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure values are established and regulated and therefore these are not addressed in this assessment.

The Maximum Individual Cancer Risk and the HIC for residential receptors as a result of Project construction are presented in Table 3.3-7.

Table 3.3-7. Construction Health Risk Assessment Results – Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk–Residential	Per Million	1.00	10	Less than Significant
Chronic Hazard Index–Residential	Index Value	0.001	1.0	Less than Significant

Source: SCAQMD 2023.
Notes: CEQA = California Environmental Quality Act.
See Appendix D-2.
Results reflect the inclusion of **MM-AQ-1.**

As shown in Table 3.3-7, Project construction activities would result in a Residential Maximum Individual Cancer Risk of 1.00 in 1 million, which does not exceed the significance threshold of 10 in 1 million. Project construction would result in a Residential HIC of 0.001 which is below the 1.0 significance threshold. Thus, impacts would be less than significant.

Additionally, because the emissions from improvements at the SCE Valley Substation are a subset of the total Project emissions, improvements to the SCE Valley Substation would not result in emissions not already considered in the whole of the Project. Therefore, the Project, including Valley Substation improvements, would not result in exposure of sensitive receptors in the vicinity of the Project Site to substantial TAC concentrations, and impacts would be less than significant.

In summary, the Project, including improvements to the SCE Valley Substation, would not result in any potentially significant contribution to local or regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Impacts would be less than significant.

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 occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the Project. Potential odors produced during construction would be attributable to concentrations of

unburned hydrocarbons from tailpipes of construction equipment and asphalt pavement application. Such odors would disperse rapidly from the Project Site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). The Project would not create any new sources of odor during operation. Therefore, Project operations, including SCE Valley Substation improvements, would result in an odor impact that is less than significant

Mitigation Measures

MM-AQ-1: Construction Equipment Emissions Reductions. The following measure shall be incorporated into the Project to reduce construction criteria air pollutant emissions, including VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$, generated by construction equipment used for the Project. Prior to the issuance of a grading permit, the following shall be incorporated into the grading plan and/or grading permit conditions:

- For off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 final. An exemption from these requirements may be granted in the event that the developer documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment.[14]
- Before an exemption may be considered, the developer shall be required to demonstrate that two construction fleet owners/operators in the region were contacted and that those owners/operators confirmed Tier 4 final or better equipment could not be located in the region. To ensure that Tier 4[15] construction equipment or better would be used during the Project's construction, the developer will include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

[14] For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded from a Tier 4 Interim to a higher tier (i.e., Tier 4 Final) or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards.

[15] Tier 4 refers to a set of emissions requirements established by the EPA. These regulations aim to reduce emissions of particulate matter, oxides of nitrogen (NO_x), and air toxics from new, non-road diesel engines.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or 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?	☐	☒	☐	☐

Sources: Menifee GP; Menifee GP Draft EIR; Menifee GP Exhibit OSC-8: MSHCP Survey Areas; Riverside County Transportation and Land Management Agency, *Western Riverside County Multiple Species Habitat Conservation Plan* (MSHCP), Approved June 7, 2003; U.S. FWS Threatened and Endangered Species Active Critical Habitat Report, Updated December 2022; *Biological Resources Letter Report/MSHCP Consistency Analysis* (Dudek, November 2023) included in **Appendix E1,** *Fairy Shrimp Survey Report.*(Dudek, January 2024) included in **Appendix E2**, *Determination of Biologically Equivalent or Superior Preservation* (Dudek, March 2025) included in **Appendix E3.**

Applicable General Plan Policies:

Goal OSC-8. Protected biological resources, especially sensitive and special status wildlife species and their natural habitats.

Policy OSC-8.1. Work to implement the Western Riverside County Multiple Species Habitat Conservation Plan in coordination with the Regional Conservation Authority.

Policy OSC-8.2. Support local and regional efforts to evaluate, acquire, and protect natural habitats for sensitive, threatened, and endangered species occurring in and around the City.

Policy OSC-8.3. Partner with non-profit agencies at the local, regional, state, and federal level to fulfill the obligations of the MSHCP to preserve and protect significant biological resources.

Policy OSC-8.4. Identify and inventory existing natural resources in the City of Menifee.

Policy OSC-8.5. Recognize the impacts new development will have on the City's natural resources and identify ways to reduce these impacts.

Policy OSC-8.6. Pursue opportunities to help the public understand and appreciate Menifee's biological resources.

Policy OSC-8.8. Implement and follow MSHCP goals and policies when making discretionary actions pursuant to Section 13 of the Implementing Agreement.

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

Less-than-Significant Impact. Special-status biological resources potentially present on the Project site were identified through a literature search for the following USGS quadrangles (which include the quadrangle upon which the study area is depicted [Romoland] and the eight surrounding quadrangles): Lakeview, Perris, Steele Peak, Wildomar, Murrieta, Bahelor Mountain, Lake Elsinore, and Winchester.

Additionally, Dudek Biologists conducted a general biological survey, rare plant survey, and jurisdictional delineation of the Project site on November 11, 2022. The general biological survey and rare plant survey was conducted on foot. The site was walked thoroughly to complete the resource inventory and rare plant survey. All native and naturalized plant species encountered within the Project were identified and recorded. Vegetation communities and land covers on site were mapped directly in the field. Dudek Biologist conducted a vernal pool habitat assessment and rare plant survey on May 29, 2023, to determine if the site had vernal pool plant species after pooling water had dried and to determine if any rare plants were present in spring. All spring floral species and incidental wildlife observed during this study were recorded.

A burrowing owl habitat assessment was conducted during the November 11, 2022, visit to identify suitable habitat for burrowing owl (*Athene cunicularia*) within the Project site. This assessment was conducted in accordance with the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area (RCA 2006). Due to the presence of suitable habitat and the requirements of the MSHCP, a Dudek Biologist conducted a focused burrow survey (Step II-A) and focused burrowing owl surveys (Step II-B) from April through June 2023, in accordance with the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area (RCA 2006). The area surveyed on foot was limited to the Project site boundary, and a 500-foot buffer was surveyed with binoculars.

The focused burrow survey consisted of pedestrian transects spaced approximately 30 meters (approximately 100 feet) apart to allow for 100% visual coverage of the Project site. All burrows suitable for burrowing owl were mapped and are included in Appendix E. A total of four focused burrowing owl surveys were conducted during the burrowing owl breeding season (March 1–August 31). The burrowing owl survey area was the entire site based on mapped marginally suitable habitat. This area totaled the entire Project site, 27.2 acres.

Reconnaissance surveys were conducted on the approximately 17-acre proposed laydown area in January, February, March and June 2024. The reconnaissance survey consisted of meandering transects throughout the proposed project site. The purpose of the survey was to identify existing vegetation communities, land covers, commonly occurring plant and wildlife species, plant and wildlife species protected under the federal and/or state Endangered Species Acts, and determine the likelihood of occurrence of any special-status plant and wildlife species. In addition, an assessment of the site for jurisdictional features, such as wetland, vernal pools, streams, or drainages subject to U.S. Army Corp of Engineers, California Department of Fish and Wildlife (CDFW), and the Regional Quality Control Board was conducted for the proposed laydown yard during the January 17, 2024, reconnaissance survey. The survey was conducted when weather conditions were partly favorable with 100% cloud cover, wind speeds from 2 to 3 miles per hour, and temperatures ranging from 50°F to 58°F. All naturalized plant species encountered on the project site were identified to species if able and recorded. Land cover types were roughly mapped but not part of a formal vegetation mapping effort. A jurisdictional delineation was not conducted at the time of the habitat assessment. Based on analysis of historical aerial imagery, the laydown parcel appears to have been intermittently farmed since 1985 (Google Earth 2024). Evidence of recent tillage and discing of on-site soils was noted during 2024 reconnaissance surveys. The northern 4 acres lack riverine/riparian resources; the remaining 13 acres contain several drainage ditches and inundated ponds that support similar riverine and vernal pool functions as would be lost on the project site from construction and operation of the project (Appendix E3).

Vegetation on the laydown parcel is comprised of disturbed habitat and shows evidence of recent soil tillage and discing from agricultural activities throughout. Non-native, invasive grasses and ruderal herbaceous plant species such as cheeseweed (*Malva parviflora*), shortpod mustard (*Hirschfeldia incana*), and prickly lettuce (*Lactuca serriola*) dominate the site and several non-native, mature eucalyptus trees are established in the northwestern portion of the site. Areas of the southern portion of the site which appear to be seasonally inundated are dominated by non-native wetland indicator plants like curly dock (*Rumex crispus*) and annual rabbitsfoot grass (*Polypogon monspeliensis*) (Appendix E3).

Special-Status Plants

One non-listed special-status plant was documented on the Project site: San Diego tarweed (CNPS 4.2). Impacts to San Diego tarweed is not considered significant. No other special-status listed, or non-listed plant species were detected within the Project site. No listed or non-listed special-status plant species have moderate or high potential to occur within the Project site. Additionally, the SCE Valley Substation is an existing facility on disturbed land that does not contain sensitive communities. Therefore, impacts to special-status plant species is considered less than significant. No mitigation is required.

Special-Status Wildlife

One species of special concern—western spadefoot toad—was detected within the Project site; however, this species is a fully covered species under the MSHCP. Therefore, compliance with the MSHCP offsets potential direct and indirect impact to this species and impacts would be less than significant with mitigation. **MM-BIO-1** (Implementation of Determination of Biologically Equivalent or Superior Preservation) requires the Project to mitigate the loss of western spadefoot toad habitat through payment of the MSHCP Local Development Mitigation Fee, the purchase of rehabilitation and re-establishment credits from Riverpark Mitigation Bank, or through the establishment of western spadefoot toad populations within the Applicant-led off-site mitigation

Burrowing Owl

The focused burrowing owl surveys concluded that burrowing owls were absent from the Project site and the SCE Valley Substation is an existing facility denuded of all vegetation or cover that would be suitable burrow habitat; however, burrowing owl could move into the Project site prior to initiation of construction activities. The area is considered by the Riverside MSHCP as a Burrowing owl survey area (Figure 8). Direct impacts to burrowing owl would be significant if they occupy the site. Additionally, if burrowing owl occupy surrounding habitat within 500 feet of construction activities, indirect impacts could be significant. To avoid potential for significant impacts to burrowing owl during construction activities and to remain consistent with the MSHCP, **COA-BIO-1, Burrowing Owl Pre-Construction Surveys** requires a pre-construction burrowing owl survey be conducted prior to construction initiation and avoidance measures implemented if burrowing owl are present. As such, impacts to burrowing owls would be less than significant with implementation of **COA-BIO-1**.

Nesting Birds

Project construction could result in direct and indirect impacts to nesting birds, including the loss of nests, eggs, and fledglings if ground-disturbing activities occur during the nesting season (generally February 15 through August 31). Construction activities during this time may result in reduced reproductive success and may violate the federal Migratory Bird Treaty Act and California Fish and Game Code. If construction (including any ground-disturbing activities) occurs during the nesting season, a nesting bird survey must be conducted by a qualified biologist prior to grading activities. If nesting birds are observed within or adjacent to the construction activities, avoidance of active bird nests should occur as determined by the qualified biologist to ensure compliance with these regulations. With implementation of **COA-BIO-2** (Nesting Birds), impacts to nesting birds would be less than significant.

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, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less-than-Significant Impact with Mitigation. There are no special-status vegetation communities as defined by CDFW within the Project site; therefore, the Project would not result in direct or indirect impacts to special-status vegetation communities. Improvements to the SCE Valley Substation would occur within the existing substation footprint, which is already disturbed and does not contain sensitive natural communities. No impacts would occur.

The MSHCP defines riparian/riverine areas as "lands which contain habitat dominated by trees, shrubs, persistent emergent, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year." The MSHCP further clarifies those areas "demonstrating characteristics as described above which are artificially created are not included in these definitions" (County of Riverside 2003)

The Project site does not support any riparian habitat. The Project site supports a few scattered individuals of mulefat (*Baccharis salicifolia*). This riparian vegetation is small in its extent, lacks understory or closed-canopy features, lacks continuity with higher quality habitat, and is not contiguous. These scattered individuals are not considered a riparian/riparian resource as defined by the MSHCP.

A swale was mapped off Case/Matthews Road and runs near the eastern and southern border of the Project site. These areas contain freshwater flow during a portion of the year and lack any vegetation. Therefore, the swale within the Project site would be considered riparian/riverine resource pursuant to MSHCP Section 6.1.2. In total, the Project site supports 0.11 acres of MSHCP Section 6.1.2 riparian/ riverine resources.

The Project would result in impacts to riparian/riverine resources as defined by the MSHCP and as summarized in Table 3.4-1.

Table 3.4-1. Impacts to MSHCP Riverine Resources within the Project Site

Vegetation Community/Land Cover	Impacts to MSHCP Riverine Resources (Acres/Linear Feet)	Total Acreage/ Linear Feet
Vegetation Communities		
Sparsely Vegetated Playa (Ephemeral Annuals) (CDFW) Vernal Pools, Seeps and Meadows Southern -Hardpan Vernal Pool (Gray and Bramlet 1992)	0.12	0.12
Non-natural Land Covers		
Swale	0.11/1311.74	0.11/1,311
Disturbed Habitat	—	—
Urban/Developed	—	—
Total	**—**	**0.23/1,311**

Note: Acreage may not total due to rounding.

As the proposed Project cannot demonstrate avoidance of riparian/riverine resources in perpetuity, a Determination of Biologically Equivalent or Superior Preservation (DBESP) Report is required to propose mitigation that demonstrates equivalent or superior function and value. A DBESP has been prepared for the Project and is included as Appendix E3. Early consultation with the U.S. Fish and Wildlife Service was conducted and although they generally agreed with the approach of the DBESP, they recommended some minor changes. Those changes have been incorporated into Appendix E3. The DBESP proposes a mitigation strategy that would provide biological superior preservation to the MSHCP Section 6.1.2 resources lost from project development through a minimum of 4:1 reestablishment and 3:1 rehabilitation credits at Riverpark Mitigation Bank totaling 0.82 acres. Permanent impacts to 0.12 acres of the ephemeral swale would be mitigated at a 1:1 ratio through the purchase of 0.12 acres of rehabilitation credits; permanent impacts to 0.11 acres of vernal pools would be mitigated at a total 6:1 ratio through the purchase of 0.45 acres of

reestablishment credits (4:1) and 0.25 acres of rehabilitation credits (2:1), totaling 0.82 acres of compensatory mitigation.

Conversely, applicant-lead off-site compensatory mitigation of the immediately adjacent temporary laydown yard parcel, as described in Appendix E3, would provide superior or equivalent preservation of riparian and riverine resources as well. The off-site mitigation approach could result in up to approximately 0.25 acres of vernal pool rehabilitation, 0.45 acres of vernal pool reestablishment, and 0.02 acres of swale reestablishment which could serve as a total of 0.72 acres of mitigation (minimum 3:1 mitigation) for impacts to MSHCP Section 6.1.2 vernal pool and riverine resources on the project site. Enhancement of upland buffer zones around vernal pools would offer approximately 4.22 acres of mitigation which may also count toward vernal pool mitigation, providing superior preservation than what currently exists and would be impacted on the project site. Furthermore, implementation of stormwater BMPs and the MSHCP Urban/Wildlife Interface Guidelines will reduce indirect project impacts to MSHCP riparian/riverine resources. Mitigation Measure **MM-BIO-1** requires implementation of the DBESP and ensures replacement of any lost function and values of the riparian/riverine habitat.

Several existing aquatic features are present on the laydown parcel, including two ephemeral basins along the southeastern boundary (Figure 6: Conceptual Mitigation Area Map of Appendix E3). The basins contained ponded water in January of 2024 and showed clear evidence of wetland indicators like soil cracks and hydrophytic non-native vegetation in June 2024 reconnaissance surveys.

Additionally, a larger ephemeral basin/seasonal wetland exists at the southwest corner of the laydown yard/mitigation site (Figure 6 of Appendix E3) where vegetation is dominated by the ruderal, non-native wetland indicator plant curly dock. This feature was inundated in February 2024 and is adjacent (to the north of) to a larger feature that appears to be subject to significant ponding on historical aerial imagery. The National Wetlands Inventory displays a mapped freshwater emergent wetland on the site adjacent to this feature (USFWS 2024). No other National Wetlands Inventory features are mapped within the mitigation site boundaries.

Although not clearly discernible during 2024 reconnaissance surveys due to the flat topography and disturbed nature of the site, a minor upland swale which bisects the northern portion of the site is clearly visible on historical aerial imagery, showing clearly defined drainage patterns and soil moisture (Google Earth 2024). A drainage ditch, which shows minor evidence of bed and bank, is present along the northern boundary of the site and the swale may have directed water toward this feature. A similar drainage ditch is present along the southeast boundary of the site, just south of the existing ephemeral basins.

Lastly, two minor road ruts are located along the central-western boundary of the site, just east of Palomar Road, which held ponded water in February and March 2024.

Vernal Pools

The Project site contains one vernal pool where one vernal pool indicator species was observed to be abundant: slender woolly-marbles. The vernal pool consisted of almost 90% cover of slender woolly-marbles. An aerial desktop review was conducted using historical aerial imagery. Based on this desktop review, the one ephemeral depression was observed immediately south of Case/Matthews Road on site. This depression appears to have held water in 2020, 2016, and 2012. These records also depend on what season the aerial photography was performed. This area would meet the MSHCP vernal pool definition.

MM-BIO-1 requires implementation of the DBESP and ensures replacement of any lost function and values of riparian/riverine habitat including impacts to vernal pools.

Fairy Shrimp Habitat

The project area contains 21 basins that provide fairy shrimp habitat with potential to support the common, nonsensitive versatile fairy shrimp (*Branchinecta lindahli*), as well as three federally listed fairy shrimp species, vernal pool fairy shrimp (*Branchinecta lynchi*), Riverside fairy shrimp (*Streptocephalus woottoni*), and San Diego fairy shrimp (*Branchinecta sandiegonensis*).

The Riverside fairy shrimp was federally listed as endangered in August of 1993 (USFWS 1993) and is a Western Riverside County MSHCP-covered species. On December 4, 2012, the U.S. Fish and Wildlife Service (USFWS) published a Final Rule revising the critical habitat for the Riverside fairy shrimp that became effective on January 3, 2013 (USFWS 2012). The revised critical habitat now includes land in three units in Ventura, Orange, and San Diego counties, California, for a total of approximately 1,724 acres of critical habitat for this species. No critical habitat for Riverside fairy shrimp occurs in Riverside County in the original or revised Final Rules.

The vernal pool fairy shrimp was federally listed as threatened on September 19, 1994 (USFWS 1994) and is a MSHCP-covered species. On August 11, 2005, USFWS published a Final Rule designating 858,846 acres of critical habitat for four vernal pool crustaceans and 11 vernal pool plants that became effective on September 12, 2005 (USFWS 2005). This critical habitat includes 597,821 acres of land from Oregon south to Ventura County, California. No critical habitat for vernal pool fairy shrimp occurs in Riverside County in this Final Rule.

The San Diego fairy shrimp was federally listed as endangered in February 1997 (USFWS 1997). On December 12, 2007, USFWS published a Final Rule revising the critical habitat for the San Diego fairy shrimp that became effective on January 11, 2008 (USFWS 2007). This revised Final Rule designated critical habitat for the San Diego fairy shrimp to include approximately 3,082 acres of habitat in five units, with a total of 29 subunits throughout Orange and San Diego counties, California. No critical habitat for San Diego fairy shrimp occurs in Riverside County in the original or revised Final Rules.

Dudek conducted a wet season fairy shrimp survey according to the Survey Guidelines for the Listed Large Branchiopods (USFWS 2017). Dudek completed the basin sampling once a basin dried up and was not re-inundated during the wet season or once the basin reached 120 days of continual inundation. Because of the continued rain events throughout the year, the survey commenced through October 2023. Of the 21 basins that were sampled within the project area, fairy shrimp were detected in one basin and only the common versatile fairy shrimp *(Branchinecta lindahli)* was detected. No Riverside fairy shrimp (*Streptocephalus woottoni*), vernal pool fairy shrimp (*Branchinecta lynchi*), or San Diego fairy shrimp (*Branchinecta sandiegonensis*) were observed in the project area during the 2022/2023 wet season survey. The survey methods and results are provided in Appendix E2.

Riparian Birds

The proposed Project supports a few scattered mulefat shrubs. These isolated individual plants are small in extent, lack understory or closed-canopy features, lack continuity with higher quality habitat, and are not contiguous; therefore, these areas are not sufficient to support riparian bird species such as least Bell's

vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), or yellow-billed cuckoo (*Coccyzus americanus*).

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?

Less-than-Significant Impact with Mitigation. Data regarding aquatic resources present within the Project study area were obtained through a review of pertinent literature and field assessments. Both are described in detail in Appendix E. Two aquatic resources were identified during the literature review and field assessment. The jurisdictional delineation resulted in one vernal pool and one swale found to be present on the site.

The isolated vernal pool (as described in 3.4 b) would be considered a water of the state subject to the jurisdiction of Regional Water Quality Control Board (RWQCB) and CDFW

The swale conveys flows from road run-off but does not demonstrate an ordinary high water mark (OHWM) or a defined bed and bank. Based upon the field site visit, aerial imagery, and the elevation profile from Google Earth, runoff from the road conveys water into a storm drain and past the storm drain into the swale. The swale eventually abates into upland. The swale totals approximately 0.11 acres on site. No water or soil saturation was present within the swale during the field site visit. The swale does not support any riparian or wetland vegetation. Most of the vegetation within the swale consists of tumbleweed (*Salsola tragus*). This feature is not considered a jurisdictional water of the United States as it does not contain an OHWM. This swale is considered a water of the state (RWQCB and CDFW) and is not considered a federal water due to the lack of a bed and bank, lack of OHWM, and lack of a nexus to a traditional navigable water.

The Project site supports aquatic resources that are jurisdictional under the RWQCB and CDFW. Prior to construction activity, the Project applicant shall coordinate with the Santa Ana RWQCB (Region 8) to ensure conformance with the requirements of the Porter-Cologne Water Quality Control Act. Prior to activity within CDFW jurisdictional streambeds or associated riparian habitat, the applicant shall coordinate with CDFW (Inland Deserts Region 6) relative to conformance with the Lake and Streambed Alteration permit requirements. **MM-BIO-1** (Implementation of Determination of Biologically Equivalent or Superior Preservation) requires the Project to mitigate the loss of jurisdictional water at a minimum of 1:1 with reestablishment credits totaling 0.23 acres of jurisdictional waters in accordance with the DBESP (Appendix E3).

Therefore, impacts to federally or state protected wetlands would not occur with compliance to existing regulatory requirements, and impacts would be less than significant with implementation of mitigation measure MM-BIO-1.

Improvements to the SCE Valley Substation would occur within the existing substation footprint, which is already disturbed and does not contain federally protected wetlands. No impacts 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. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Habitat linkages are small patches that join larger blocks of

habitat and help reduce the adverse effects of habitat fragmentation; they may be continuous habitat or discrete habitat islands that function as stepping-stones for wildlife dispersal. The Project site and the surrounding environment to the north, east, west, and south contain developed lands, roads, commercial buildings, and disturbed lands. The disturbed lands likely function as open habitat. The Project site may provide local movement for some urban-adapted wildlife species (i.e., coyote [*Canis latrans*], striped skunk [*Mephitis mephitis*], raccoon [*Procyon lotor*], and Virginia opossum [*Didelphis virginiana*]), but these species would be expected to continue to use the developed, disturbed spaces adjacent to the Project site and the area post-project. The Project would not alter any wildlife connections. The Project site currently does not function as a wildlife corridor and does not support any wildlife nursery sites. As a result, implementation of the proposed Project would not result in impacts to these resources. No mitigation is required.

Improvements to the SCE Valley Substation would occur within areas previously disturbed and occupied by existing electrical facilities. Construction and operation of the interconnection facilities would not impact any sensitive vegetation communities, riparian, wetland, or aquatic resources. Because the improvements would occur in previously disturbed areas that currently are used for electrical transmission infrastructure, the improvements would not have impacts on any special-status species or hamper wildlife movement corridors through the Project site or surrounding area. SCE would also implement standard measures and BMPs during construction and operation. Construction, operation and maintenance of the SCE interconnection infrastructure would result in no impact to biological resources.

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

No Impact. There are no trees on-site that are considered Heritage Trees as defined in the City's Tree Preservation Ordinance (MMC 9.86.110). The Project would install trees along the Project perimeter required for public screening. Selected landscape plants are included on the Riverside County Comprehensive Plant List and no plants included on the MSHCP or California Invasive Plant Council list of invasive plants would be incorporated into landscaping. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impact would occur in this regard.

Improvements to SCE Valley Substation would occur within areas previously disturbed and occupied by existing electrical facilities within the substations and powerhouses. Construction and operation of the interconnection facilities would not conflict with any local policies or ordinances protecting biological resources. SCE would also implement standard measures and BMPs during construction and operation. Construction, operation and maintenance of the SCE interconnection infrastructure would result in no impact related to ordinances or local policies protecting biological resources.

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

Less-than-Significant Impact with Mitigation. The Project site overlaps both the Western Riverside MSHCP and the Stephens' Kangaroo Rat Habitat Conservation Plan. No wildlife species that are Covered Species and Adequately Conserved by the Western Riverside County MSHCP were detected within the Project site during the habitat assessment. The proposed Project would not directly affect any MSHCP-covered plant and animal species for which surveys can sometimes be required or special mitigation

arranged. Payment of MSHCP and Stephens' kangaroo rat fees are intended to offset habitat losses for animals such as Stephens' kangaroo rat, coyote, and bird species that might utilize the Project site. The impacts that might occur on-site are what the Western Riverside County MSHCP anticipated in areas not situated in Criteria Area Cells (i.e., potential future MSHCP Reserve lands). Impacts are primarily offset through MSHCP fee payment and Stephens' kangaroo rat fee payment. Overall, the Project would not conflict with the relevant provisions of the MSHCP, and a less than significant impact would occur in this regard with the implementation **COA-BIO-1** through **COA-BIO-3**.

As described in Section 3.4 b) and c), the Project site supports riparian/riverine resources and vernal pool as defined by the MSHCP. The proposed Project would result in the permanent loss of approximately 0.11 acres of MSHCP riparian/riverine resources and 0.12 acres of vernal pool resource. There would be no temporary impacts to riparian/riverine resources or the vernal pool resource. To remain consistent with the MSHCP, the Project has prepared a DBESP identifying avoidance, minimization, and mitigation measures for impacts to riverine resources. With implementation of **MM-BIO-1** (Implementation of Determination of Biologically Equivalent or Superior Preservation), the Project is consistent with Section 6.1.2 of the MSHCP, and impacts would be less than significant.

Improvements to the SCE Valley Substation would occur within areas previously disturbed and occupied by existing infrastructure. Construction and operation would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan. SCE would also implement standard measures and BMPs during construction and operation. Construction, operation and maintenance of the SCE interconnection infrastructure would result in no impact related to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan

Standard Conditions of Approval

COA-BIO-1 Burrowing Owl Pre-Construction Surveys

Due to the presence of potentially suitable habitat, a 30-day preconstruction survey for burrowing owls is required prior to initial ground-disturbing activities (including vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the Project site prior to the initiation of ground-disturbing activities, the Project proponent will immediately inform the Regional Conservation Authority (RCA) and the Wildlife Agencies and will need to coordinate further with RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.

COA-BIO-2 Nesting Birds.

To maintain compliance with the Migratory Bird Treaty Act and California Fish and Game Code, if ground-disturbing and/or vegetation clearance activities are scheduled to occur during the avian nesting season (typically February 15 through August 31), a pre-construction nesting bird survey

shall be conducted by a qualified biologist within the Project site and a 500-foot buffer around the Project site. Surveys shall be conducted within 3 days prior to initiation of activity and shall be conducted between dawn and noon.

If an active nest is detected during the nesting bird survey, avoidance buffers shall be implemented as determined by a qualified biologist. The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests shall be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been unsuccessful or abandoned.

COA-BIO-3 General Avoidance, Minimization Measures and MSHCP Best Management Practices

The following best management practices, as applicable, shall be implemented for the duration of construction:

Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage onto the Project site. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials shall be reported to appropriate entities including, but not limited to, the applicable jurisdictional city, USFWS, CDFW, and RWQCB, and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.

To avoid attracting predators of the species of concern, the Project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).

Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed Project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the Project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.

Mitigation Measures

MM-BIO-1 Implementation of Determination of Biologically Equivalent or Superior Preservation.

Prior to issuance of grading/building permit, the Project shall implement the mitigation approach outlined in the approved DBESP to ensure replacement of any lost function and values of the riparian/riverine habitat as follows:

The applicant shall compensate for 0.23 acres of permanent impacts to MSHCP Section 6.1.2 vernal pool and riverine habitat in compliance with the Western Riverside County MSHCP Section 6.1.2, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools. The mitigation strategy will ensure replacement of any lost functions and values of riparian/riverine

habitat as it relates to vernal pool and riverine resources, and will include the following mitigation strategy, in combination or entirety:

A. Payment of the MSHCP Local Development Mitigation Fee to fund acquisition and conservation of certain land.
B. Permanent impacts to 0.12 acres of MSHCP Section 6.1.2 riparian/riverine habitat consisting of the on-site ephemeral drainage ditch would be mitigated at a 1:1 ratio through the purchase of 0.12 acres of rehabilitation credits from the Riverpark Mitigation Bank. Permanent impacts to 0.11 acres of vernal pools would be mitigated at a 6:1 ratio through the purchase of 0.45 acres of reestablishment credits and 0.25 acres of rehabilitation credits from Riverpark Mitigation Bank as described in Table 3 of the approved DBESP. The project shall provide proof of the completed purchase of credits at Riverpark Mitigation Bank. Proof of purchase of mitigation bank credits consists of two documents: (1) a copy of the receipt for the purchase of the credits, and (2) a copy of the credit purchase agreement between the Applicant and the Riverpark Mitigation Bank; the purchase agreement/contract should name the Double Butte BESS Project as the development project for which the mitigation credits were purchased. The two requested documents shall be provided prior to the issuance of a grading permit for the Project; no other documents shall be accepted.

If sufficient mitigation credits are not available to reestablish and rehabilitate lands within the mitigation bank area, then the deficiency in credits would be filled by one or a combination of the following:

A. Applicant-lead off-site mitigation through purchase of a 16.5-acre immediately adjacent off-site parcel located southeast of the project site along Palomar Road and McLaughlin Road, of which the northwestern approximately 4-acre portion shall be used as a temporary construction laydown yard for the project (pending final planning and design). A habitat assessment conducted in 2024 by Dudek for the off-site parcel determined the existing conditions contain topographic characteristics to support prolonged inundation, and is capable of restoring the habitat function (establishment of native riparian or riverine habitat in place of existing non-native disturbed or developed habitat). Applicant-lead off-site mitigation shall restore and create vernal pool habitat at a minimum 1:1 establishment or rehabilitation (a higher ratio of 3:1 or above may be required for vernal pool mitigation) to ensure equivalent preservation for the MSHCP Section 6.1.2 resources lost from project implementation, as determined by the wildlife agencies. A permanent conservation easement or deed restriction shall be put in place over the mitigation parcel by the applicant/permittee to ensure resources are protected in perpetuity. A restoration plan for the Applicant-lead off-site mitigation shall be prepared and submitted to the wildlife agencies for review and approval. The restoration plan shall include details on establishing and relocating the population of western spadefoot toads on the project site to the off-site mitigation parcel.
B. These mitigation habitats would be funded, implemented, monitored, and reported on for a minimum of 5 years. The mitigation habitat would then enter into long-term management which would be funded through an endowment in perpetuity. A long-term management plan would also be prepared to ensure that the mitigation site is successful. Each of these

plans, and the funding proposed, would be reviewed and approved by the responsible wildlife agencies.

3.5 Cultural Resources

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

Sources: Menifee GP; Menifee GP Draft EIR, Cultural Resources Assessment (Dudek, January 2024) provided in Appendix F.

Applicable General Plan Policies:

Goal OSC-5. Archaeological, historical, and cultural resources that are protected and integrated into the City's built environment.

Policy OSC-5.1. Preserve and protect archaeological and historic resources and cultural sites, places, districts, structures, landforms, objects and native burial sites, traditional cultural landscapes and other features, consistent with state law and any laws, regulations or policies which may be adopted by the city to implement this goal and associated policies.

Policy OSC-5.4. Establish clear and responsible policies and best practices to identify, evaluate, and protect previously unknown archaeological, historic, and cultural resources, following applicable CEQA and NEPA procedures and in consultation with the appropriate Native American tribes who have ancestral lands within the city.

Policy OSC-5.5. Develop clear policies regarding the preservation and avoidance of cultural resources located within the city, in consultation with the appropriate Native American tribes who have ancestral lands within the city.

Policy OSC-5.6. Develop strong government-to-government relationships and consultation protocols with the appropriate Native American tribes with ancestral territories within the city in order to ensure better identification, protection and preservation of cultural resources, while also developing appropriate educational programs, with tribal participation, for Menifee residents.

Significance Analysis and Determination:

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

Less Than Significant Impact. According to the State CEQA Guidelines, a historical resource is defined as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in PRC Section 5020.1(k); (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by the Project's Lead Agency.

The California Register of Historical Resources defines a "historical resource" as a resource that meets one or more of the following criteria: (1) associated with events that have made a significant contribution to the broad patterns or local or regional history of the cultural heritage of California or the United States; (2) associated with the lives of persons important to local, California, or national history; (3) embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values; or (4) has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Records Search

To determine if historical or cultural resources exist or are likely to exist on the Project site Dudek conducted a records search at the Eastern Information Center (EIC) for the Project area of potential effect (APE) and a one-mile radius buffer around the Project APE on October 12, 2023. The record search identified thirty-nine (39) previous cultural resources studies that have been performed within one mile of the Project area. Five of these previous studies intersect the current Project APE and are listed in Table 3.5-1 below. These studies include five resource inventory reports. None of the studies identified resources within the Project APE. The BESS parcel has been completely surveyed whereas the laydown yard has only had the northern 30% previously surveyed. The studies not listed in Table 3.5-1 are included in Appendix F.

Table 3.5-1. Reports Intersecting Project APE

Report Number	Date	Author	Title
RI-01237	1980	Robert J. Wlodarski and John M. Foster	Cultural Resource Overview for the Devers Substation to Serrano Substation transmission route alternatives corridor right-of-way
RI-01660	1983	Daniel F. McCarthy	Archaeological Assessment of the proposed Homeland-Green Acres Pollution Project NO. C-06-2886, Eastern Municipal Water District, Riverside County, California
RI-02475	1989	Christopher E. Drover	A Cultural Resource Inventory of the Menifee North Project, near Hemet, California
RI-06018	2003	Bai Tang, Michael Hogan, Mariam Dahdul, and Daniel Ballester	Historical/Archaeological Resources Survey Report: Menifee Valley North Drainage Facilities Project, in and near the communities of Romoland and Homeland, Riverside County, California
RI-07966	2008	Sara Clowery-Moreno and Brian F. Smith	A Phase I Archaeological Assessment for the Retaining Walls Project, Riverside County, California APNs 331-210-019, -020, and -021; Cup 03560

The EIC records search also revealed that no cultural resources have been recorded within the Project APE. The records search did identify five multicomponent sites, nine historic road segments, five single family dwellings, three historic structures/foundations, two historic refuse deposits, one historic tree alignment, one historic railroad segment, two prehistoric temporary camps, five prehistoric bedrock milling sites, one prehistoric lithic scatter, two isolated flakes and one rock art site within 1 mile of the Project APE (Table 3.5-2). The closest resource is P-37-015743, historic segment of railroad immediately to the northeast border of the Project APE. No historic addresses have been recorded within one mile of the Project APE. The results of the records search and all Department of Parks and Recreation forms are located in Confidential Appendix F (on file with the City of Menifee). Non-Confidential Appendix F is provided for public review and contains redacted descriptions of cultural resources identified within the Project APE to comply with State and federal law regarding confidentiality of cultural and TCRs.

Table 3.5-2. Previously Recorded Cultural Resources in the One-Mile Record Search Radius

Primary Number	Trinomial	Age	Description	Proximity
P-33-007701	—	Historic	Single family dwelling	Within one mile
P-33-009724	—	Historic	Farm structures	Within one mile
P-33-009725	CA-RIV-007883	Historic	Foundations and structures	Within one mile
P-33-009726	—	Historic	Stockyard and foundation	Within one mile
P-33-009727	CA-RIV-006483	Prehistoric	Temporary camp	Within one mile
P-33-011464	CA-RIV-006842H	Historic	Refuse deposit	Within one mile
P-33-011465	CA-RIV-006843	Prehistoric	Bedrock milling features	Within one mile
P-33-011466	CA-RIV-006844/H	Multicomponent	Bedrock milling features and historic refuse deposit	Within one mile
P-33-011467	CA-RIV-006845	Prehistoric	Bedrock milling features and lithic scatter	Within one mile
P-33-011468	CA-RIV-006846/H	Multicomponent	Bedrock milling features and historic refuse deposit	Within one mile
P-33-011469	CA-RIV-006847	Prehistoric	Bedrock milling features	Within one mile
P-33-011470	CA-RIV-006848/H	Multicomponent	Bedrock milling features and historic refuse deposit	Within one mile
P-33-011471	CA-RIV-006849/H	Multicomponent	Bedrock milling feature, lithic scatter, and historic refuse deposit	Within one mile
P-33-011472	CA-RIV-006850	Prehistoric	Bedrock milling features	Within one mile
P-33-012535	CA-RIV-007129	Prehistoric	Bedrock milling feature and lithic scatter	Within one mile
P-33-012536	CA-RIV-007130	Prehistoric	Temporary camp	Within one mile
P-33-015381	—	Historic	Single family dwelling	Within one mile
P-33-015382	—	Historic	Single family dwelling	Within one mile
P-33-015383	—	Historic	Single family dwelling	Within one mile
P-33-015389	—	Historic	Single family dwelling	Within one mile
P-33-015743	CA-RIV-008196	Historic	Railroad segment	Within one mile
P-33-018085	CA-RIV-009288	Multicomponent	Bedrock milling features and historic refuse deposit	Within one mile

Table 3.5-2. Previously Recorded Cultural Resources in the One-Mile Record Search Radius

Primary Number	Trinomial	Age	Description	Proximity
P-33-018086	CA-RIV-009289	Historic	Refuse deposit	Within one mile
P-33-020447	CA-RIV-010348	Historic	Road	Within one mile
P-33-020448	CA-RIV-010349	Historic	Road	Within one mile
P-33-020449	CA-RIV-010350	Historic	Road	Within one mile
P-33-020450	CA-RIV-010351	Historic	Road	Within one mile
P-33-020502	CA-RIV-010403	Historic	Road	Within one mile
P-33-020503	CA-RIV-010404	Historic	Road	Within one mile
P-33-020504	CA-RIV-010405	Historic	Road	Within one mile
P-33-020505	CA-RIV-010406	Historic	Road	Within one mile
P-33-020640	CA-RIV-010543	Historic	Road	Within one mile
P-33-024087	—	Prehistoric	Isolate-flake	Within one mile
P-33-024902	CA-RIV-012345	Prehistoric	Lithic scatter	Within one mile
P-33-028165	—	Prehistoric	Rock art	Within one mile
P-33-028203	—	Historic	Tree alignment	Within one mile
P-33-029762	—	Prehistoric	Isolate-flake	Within one mile

Historic aerial images and topographic maps were reviewed to understand the development of the Project APE and surrounding properties at historicaerials.com (NETR 2023). Historic aerial photographs of the Project APE were available for 1966 through 2020. The historic aerial from 1966 shows both the BESS and laydown portions of the Project APE as developed grass fields, separated by a triangular segment of trees at the northeastern corner of the intersection of Palomar Rd and McLaughlin Rd. Between 1996 and 2002 the western half of the BESS parcel is sectioned off with fencing and cleared. The northwestern quad appears to have been used as a paving materials storage. This usage appears to continue until 2009 when the entire northwestern quadrant was paved while the southwestern quadrant was heavily graded and covered in gravel. During this period the eastern half is generally kept low in vegetation, but not developed further. A small drainage channel is present trending northeast/southwest from the northeastern corner of the BESS parcel. This drainage is consistent throughout the aerials until 2016, when a culvert is installed along the southern boundary and interrupts the flow of the drainage.

The alignment of Palomar Rd is visible on the 1966 aerial; however, McLaughlin is not present until the 1978 aerial. The Atchison Topeka and Santa Fe Railroad is extant on the 1966 aerial, as well as the adjacent Matthews Rd. The Romoland residential development to the northwest of the BESS parcel was present on the 1966 and saw little development until a large influx of construction between 1978 and 1985 occurred. This also included the regional additional development of dirt roads in cardinal directions. A channelized canal is visible on the southern border of the BESS parcel between 2014 and 2016.

The southern parcel, to be used as a laydown yard, appeared to have been used as agricultural land from 1967 to 2002. A stock pond was located just outside of the Project boundary's southwestern corner, adjacent to the Palomar Rd. A drainage is present trending north/south along the western third of the parcel. The portion of the parcel that was disked and cultivated appears to have varied over the years to

accommodate for the seasonal flow of this drainage. This makes the northwestern portion of the laydown yard parcel the least impacted portion of the laydown yard parcel.

Historic topographic maps of the APE were available from 1943 to 2022. No historic structures are located within the Project APE. The Atchison Topeka and Santa Fe Railroad and adjacent Matthews Rd are visible on the earliest topographic map and appear to have unchanged alignments through time, though updates are periodically visible. The Project APE is generally shown as dry flat land on the topographic maps, with the exception of the 1962 map, which shows an ephemeral drainage terminating in the eastern side of the BESS parcel after crossing the railroad and coming from the northeast. This drainage traverses the greenspace area northeast of the intersection of Palomar Rd and McLaughlin Rd. This greenspace was developed with the formal naming of McLaughlin Rd between the 1985 and 2012 maps.

NAHC and Tribal Correspondence

A search of the Native American Heritage Commission (NAHC) Sacred Lands File was requested on September 29, 2023, for the Project APE and a one-mile buffer. The Sacred Lands File consists of a database of known Native American resources. These resources may not be included in EIC database. Dudek received a response on November 17, 2023. The NAHC results were negative. The NAHC response also included a list of 31 tribal representatives who should be contacted. Dudek mailed outreach letters to the listed representatives on November 28, 2023. To date four responses have been received and are summarized below in **Table 3.5-3: Summary of Tribal Responses**. Copies of the communications are in Appendix F.

Table 3.5-3: Summary of Tribal Responses

Tribal Representative	Tribe	Response Date	Response
Geramy Martin, Tribal Secretary	Augustine Band of Cahuilla Indians	November 29, 2023, via email	Indicated that there were no known resources that may be affected by the Project. In the event cultural resources are found, their office should be contacted immediately for further evaluation.
Lorrie Gregory, Cultural Resource Coordinator	Cahuilla Band of Indians	December 1, 2023, via email	Indicated that they had no known knowledge of cultural resources in the Project area. They request that all cultural materials associated with the Project be sent for review as the Cahuilla Band has a high interest in the Project and would like to be notified when AB 52 commences. They request tribal monitors be present for ground disturbing activities.
Xitlaly Madrigal, Cultural Resource Analyst	Agua Caliente Band of Cahuilla Indians	December 7, 2023, via email	Request a cultural resource inventory of the Project area—including record search documentation, copies of cultural resource documentation completed in connection with the Project, and the presence of approved Cultural Resource Monitors during ground disturbing activities.
Shuluuk Linton, Cultural Resource Coordinator	Rincon Band of Luiseño Indians	December 21, 2023	Indicated that they had no additional information at this time, and suggested

Table 3.5-3: Summary of Tribal Responses

Tribal Representative	Tribe	Response Date	Response
			Dudek contact the Pechanga Band of Luiseño Indians as they are geographically closer.

In compliance with AB 52, the City, as lead agency, is responsible for conducting government to government consultation with pertinent tribal entities.

Field Survey

An intensive pedestrian field survey was conducted by Dudek archaeologist Jessica Colston on December 18, 2023. Pechanga Band of Luiseño Indians Native American monitor Cameron Linton and Soboba Band of Luiseño Indians Frank Morillo participated in the survey. All survey work was conducted employing standard archaeological procedures and techniques consistent with Secretary of the Interior Standards. Fifteen-meter interval survey transects were conducted in a north-south direction. Both parcels had surface disturbance from agricultural disking, ostensibly for weed management, and were fairly level. Exposed ground surface areas such as dirt tracks, drainage furrows, and rodent burrows/spoils were inspected for potential subsurface deposits and sediment conditions.

No artifacts or features were identified during this survey, and no structures are present in the Project APE; therefore, there are no historical resources in the Project APE.

In conclusion, due to the lack of identified historical resources in the Project APE impacts to historical resources are considered less than significant. No mitigation is required.

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

Less Than Significant Impact. The Project site has been disturbed from previous agricultural, residential, and commercial uses. Additionally, the SCE Valley Substation is an existing facility which is heavily disturbed. Project construction would include ground disturbing activities. The Project site is vacant and has historically been used for some agricultural, commercial, and residential uses and record search results and an intensive pedestrian survey did not indicate the presence of archeological resources within the Project site or immediate vicinity. Based upon the results of the cultural resources study (Appendix F), the potential to encounter buried resources were determined to be minimal. However, standard Conditions of Approval COA-CUL-1 through COA-CUL-8, are required to reduce potentially significant impacts to previously unknown archeological resources that may be unexpectedly discovered during Project implementation to a less than significant level. Impacts are considered less than significant.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. No formal cemeteries are on or adjacent to the Project site. Most Native American human remains are found in association with prehistoric archaeological sites. Given the very low potential for the Project's ground-disturbing activities to encounter archaeological remains, human remains

to be potentially encountered are similarly considered low. Notwithstanding, if previously unknown human remains are discovered during the Project's ground-disturbing activities, a substantial adverse change in the significance of such a resource could occur.

Standard Conditions of Approval COA-CUL-1 through COA-CUL-8, as SCE BMPs implemented for the Valley Substation improvements, are required to reduce potentially significant impacts to previously unknown human remains that may be unexpectedly discovered during Project implementation to a less than significant level. COA-CUL-1 requires that in the unlikely event that human remains are uncovered the contractor is required to halt work in the immediate area of the find and to notify the County Coroner, in accordance with Health and Safety Code Section 7050.5, who must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of a Native American, he/she must contact the NAHC for further investigations and proper recovery of such remains, if necessary. Impacts will be less than significant with implementation of Standard Conditions of Approval COA-CUL-1 through COA-CUL-8.

Further, pursuant to PRC Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the NAHC shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the "most likely descendant." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in PRC Section 5097.98. Human remains from other ethnic/cultural groups with recognized historical associations to the area in the vicinity of the Project shall also be subject to consultation between appropriate representatives from that group and the Community Development Director. Thus, compliance with the above-referenced state laws will reduce impacts to less than significant levels.

Standard Conditions of Approval:

COA-CUL-1 Human Remains.

> If human remains are encountered, State Health and Safety Code § 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource Code § 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the "most likely descendant." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in PRC § 5097.98.

COA-CUL-2 Non-Disclosure of Location Reburials.

> It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The coroner, pursuant to the specific exemption set forth in California Government Code 6254 (r)., parties, and

Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).

COA-CUL-3 Inadvertent Archeological Find.

If during ground disturbance activities, unique cultural resources are discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, the following procedures shall be followed. Unique cultural resources are defined, for this condition only, as being multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Native American Tribe(s).

a) All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the archaeologist, the tribal representative(s) and the Community Development Director to discuss the significance of the find.

b) At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representative(s) and the archaeologist, a decision shall be made, with the concurrence of the Community Development Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

c) Grading or further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal monitors, if needed.

d) Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through Project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property, so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition.

e) If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.

f) Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the City Community Development Director for decision. The City Community Development Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the Project archeologist and shall take into account the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the City Community Development Director shall be appealable to the City Planning Commission and/or City Council.

COA-CUL-4 Cultural Resources Disposition.

In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:

a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Menifee Community Development Department:

i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.

ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request.

iii. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the City. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report.

COA-CUL-5 Archeologist Retained.

Prior to issuance of a grading permit the Project applicant shall retain a Riverside County qualified archaeologist to monitor all ground disturbing activities in an effort to identify any unknown archaeological resources.

The Project Archaeologist and the Tribal monitor(s) shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the Project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition and etc. The Project Archaeologist and the Tribal monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with any required special interest or tribal monitors.

The developer/permit holder shall submit a fully executed copy of the contract to the Community Development Department to ensure compliance with this condition of approval. Upon verification, the Community Development Department shall clear this condition.

In addition, the Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a Cultural Resources Management Plan in consultation pursuant to the definition in AB 52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the Project site. A consulting tribe is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB 52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code § 21080.3.2(b)(1) of AB 52. Details in the Plan shall include:

A. Project grading and development scheduling;
B. The Project archeologist and the Consulting Tribes(s) shall attend the pre-grading meeting with the City, the construction manager and any contractors, and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the Project following the initial Training must take the Cultural Sensitivity Training prior to beginning work and the Project archaeologist and Consulting Tribe(s) shall make themselves available to provide the training on an as-needed basis;
C. The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

COA-CUL-6 Native American Monitoring (Pechanga).

Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Pechanga Band of Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the Project to the Community Development Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.

COA-CUL-7 Native American Monitoring (Soboba).

Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Soboba Band of Luiseno Indians. Prior to issuance of a

grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the Project to the Community Development Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.

COA-CUL-8 Prior to Final Occupancy

Archeology Report - Phase III and IV. Prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).

Mitigation Measures: No mitigation is required.

3.6 Energy

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

Sources: Menifee GP; Menifee GP Draft EIR; California Energy Code; SCAB; MMC; CalGreen.

Applicable General Plan Policies:

Goal OSC-4. Efficient and environmentally appropriate use and management of energy and mineral resources to ensure their availability for future generations.

Policy OSC-4.1. Apply energy efficiency and conservation practices in land use, transportation demand management, and subdivision and building design.

Policy OSC-4.2. Evaluate public and private efforts to develop and operate alternative systems of energy production, including solar, wind, and fuel cell.

Policy OSC-4.3. Advocate for cost-effective and reliable production and delivery of electrical power to residents and businesses throughout the community.

Significance Analysis and Determination:

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 electricity and natural gas consumed during construction of the proposed Project would be temporary, would be substantially less than that required for Project operation, and would have a negligible contribution to the Project's overall energy consumption. Although the Project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time.

Construction

Electricity

Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers) would be provided by SCE. The electricity used for such activities would be temporary, would be substantially less than that required for Project operation, and would have a negligible contribution to the Project's overall energy consumption.

Natural Gas

Natural gas is not anticipated to be required during construction of the Project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the Petroleum subsection. Any minor amounts of natural gas that may be consumed as a result of Project construction would be substantially less than that required for Project operation and would have a negligible contribution to the Project's overall energy consumption.

Petroleum

Heavy-duty construction equipment associated with construction activities would rely on diesel fuel. Construction workers would travel to and from the Project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel to and from the site in gasoline-powered passenger vehicles.

Heavy-duty construction equipment of various types would be used during each phase of Project construction. Appendix D-1 lists the assumed equipment usage for each phase of construction.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO_2) emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Construction is estimated to occur in 2024 and 2025 based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the

conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2023). The estimated diesel fuel usage from construction is shown in Table 3.6-1.

Table 3.6-1. Total Proposed Project Construction Petroleum Demand

Scenario	Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
	Gallons			
Project Construction	291,672	1,508	18,110	20,649
	Total Petroleum Consumed for Project Construction			331,938

Source: Appendix D-1.

In summary, construction of the Project is anticipated to consume 20,649 gallons of gasoline and 311,290 gallons of diesel over the course of 12 months. The Project will be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. Therefore, impacts to energy resources during construction would be less than significant.

Operation

Electricity

The operation of the Project would require electricity for multiple purposes, including cooling of the battery units, lighting, appliances, and powering various equipment, such as electric cranes and forklifts. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. Electricity consumption associated with Project operation is based on the CalEEMod outputs for water, wastewater, and electric forklifts presented in Appendix D-1. The Project applicant provided anticipated annual energy demand from electricity, and CalEEMod default values for energy consumption for each land use were applied for the Project analysis when necessary. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the HVAC system; water heating system; and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the CCR serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2022 standards, became effective on January 1, 2023. According to these estimations, the Project would consume approximately 17,905,000 kilowatt-hours per year during operation (Appendix D-1).

Natural Gas

The operation of the Project is not anticipated to require any onsite natural gas consumption. Fuels used for the operation of the facility would consist primarily of diesel and gasoline. Any minor amounts of natural gas that may be consumed as a result of Project operation would have a negligible contribution to the Project's overall energy consumption.

Petroleum

During operations, the majority of fuel consumption resulting from the Project would involve the use of cranes and forklifts, routine tests of the diesel-powered onsite emergency generator, and motor vehicles traveling to and from the Project site.

Petroleum fuel consumption associated with motor vehicles traveling to and from the Project site is a function of the VMT as a result of Project operation. Like construction worker and vendor trips, fuel consumption from worker and truck trips are estimated by converting the total CO_2 emissions from operation of the Project to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Mobile source emissions were estimated using EMFAC2021. Calculations for annual mobile source fuel consumption are provided in Table 3.6-2.

Table 3.6-2. Operational Annual Mobile Source Petroleum Demand

Fuel	Source	Vehicle MT CO_2	kg/CO_2/Gallon	Gallons
Gasoline	Vehicles	3,40830.00	8.78	263
Diesel	Vehicles	10.00	10.21	935
			Total	**1,198**

Sources: Trips and vehicle CO_2 (Appendix D-1); kg/CO_2/Gallon (The Climate Registry 2023).
Notes: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram

As shown in Table 3.6-2, total annual petroleum consumption for the Project is estimated to be 1,198 gallons.

Summary

In summary, implementation of the Project would increase the demand for electricity at the Project site and petroleum consumption in the region during construction and operation. However, as the Project would be consistent with current regulations and policies, the Project would not be wasteful, inefficient, and would not result in unnecessary energy resource consumption. The Project's energy consumption demands during construction and operation would conform to the State's Title 24 standards such that the Project would not be expected to wastefully use gas and electricity. Since the proposed Project would comply with Title 24 conservation standards, the proposed Project, including SCE Valley Substation improvements, would not directly require the construction of new energy generation or supply facilities or result in wasteful, inefficient, or unnecessary consumption of energy. Moreover, vehicle usage associated with the Project would use less petroleum due to advances in fuel economy over time. Therefore, impacts would be less than significant.

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 plays a crucial role in aligning with the State's objective of achieving 100 percent renewable energy by 2045, a target reliant on energy storage to address intermittent renewable resources. Furthermore, SCE's Clean Power and Electricity Pathway has set a target of sourcing 80 percent of electricity supplied to the grid from carbon-free sources, a commitment to cleaner energy. Achieving this goal hinges on the availability of energy storage to support intermittent renewable generation. The Project proposes to construct and operate a BESS facility dedicated to advancing the State's and SCE's objectives of acquiring and storing more renewable energy. Furthermore, the Project has been designed to adhere to State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards outlined in MCC Sections 8.04 and 8.06. The Project would support the development of renewable energy located near existing energy infrastructure by providing intermittent renewable energy storage during periods of low energy production and high demand, which will also ensure delivery of energy when needed by businesses and residents within the local community, consistent with Menifee General Plan Policies OSC-4.1, OSC-4.2, and OSC-4.3. Hence, the Project, including improvements to the SCE Valley Substation, would be found consistent with State and local plans focused on renewable energy and energy efficiency, resulting in an impact that is less than significant in this context.

Mitigation Measures: No mitigation is required.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Sources: Menifee GP; Menifee GP Draft EIR; MMC; Menifee GP, Exhibits S-1, "Fault Map," S-2, "Slope Distribution," S-3, "Liquefaction and Landslides," and S-4, "Geologic Map"; California Geological Survey Seismic Hazards Program: Alquist-Priolo Fault Hazard Zones; U.S. Quaternary Faults; California Building Code; Riverside County General Plan Exhibit S-8, "Wind Erosion Susceptibility Areas"; State of California Department of Conservation Website – EQ Zapp: California Earthquake Hazards Zone Application – Earthquake Zones of Required Investigation, Geotechnical Engineering Report (Bruin Geotechnical Services, 2023) provided in Appendix G; Paleontological Resources Memo (Dudek, February 2024) provided in Appendix H.

Applicable General Plan Policies:

Goal S-1. A community that is minimally impacted by seismic shaking and earthquake-induced or other geologic hazards.

Policy S-1.1. Require all new habitable buildings and structures to be designed and built to be seismically resistant in accordance with the most recent California Building Code adopted by the City.

Goal S-2. A community that has used engineering solutions to reduce or eliminate the potential for injury, loss of life, property damage, and economic and social disruption caused by geologic hazards such as slope instability; compressible, collapsible, expansive, or corrosive soils; and subsidence due to groundwater withdrawal.

Policy S-2.1. Require all new developments to mitigate the geologic hazards that have the potential to impact habitable structures and other improvements.

Policy S-2.2. Monitor the losses caused by geologic hazards to existing development and require studies to specifically address these issues, including the implementation of measures designed to mitigate these hazards, in all future developments in these areas.

Policy S-2.3. Minimize grading and modifications to the natural topography to prevent the potential for man-induced slope failures.

Significance Analysis and Determination:

a) Would the project 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.

Less Than Significant Impact. The Project site is situated in southern California, a region known for frequent seismic activity. Consequently, substantial ground shaking is likely during the expected lifespan of the proposed Project. The geological structure of southern California is primarily influenced by northwest-oriented faults associated with the San Andreas Fault system, accommodating the majority of the right-lateral movement between the Pacific and North American tectonic plates. Prominent active faults within this system include the Newport-Inglewood, Whittier-Elsinore, San Jacinto, and San Andreas Faults.

As per the Safety Element S-1/S-2 of the Menifee City GP (Menifee GP, 2013), there are no documented active faults (those with surface displacement evidence within the past 11,000 years) within the Menifee GP's mapped area. Consequently, the risk of primary surface fault rupture in this region is deemed to be minimal to non-existent. However, Menifee is in close proximity to several active regional faults, including the San Jacinto and Elsinore faults, which have the potential to induce significant ground shaking in the area.

Additionally, the construction, operation of a BESS facility, and the installation of a generator tie-line are not expected to trigger fault ruptures on recognized earthquake faults. The Project does not involve the creation of new habitable structures or buildings, thus eliminating exposure to potential adverse consequences, including damage, injury, or loss resulting from known earthquake fault rupture. To ensure structural integrity, the Project must comply with seismic standards outlined in the California Building Code (CBC). Therefore, impacts related to rupture of a known earthquake fault would be less than significant and no mitigation would be required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. While the site is expected to encounter ground shaking over the course of its development due to its regional location, adhering to the most up-to-date CBC would ensure the creation of structurally sound buildings. The construction and operation of a BESS facility and the installation of a generator tie-line would not induce significant seismic ground shaking. To guarantee the structural integrity of all Project site structures, strict compliance with the seismic requirements detailed in the CBC is imperative.

In accordance with the County Code, the approval of a soils compaction report with proposed foundation recommendations is a prerequisite prior to the issuance of a building permit. Therefore, adherence to both the CBC and the County Code serves to prevent the Project from causing a

potentially substantial impact related to the exposure of individuals or structures to adverse effects stemming from strong seismic ground shaking.

Moreover, the implementation of the Project does not involve the introduction of new habitable structures or buildings. Consequently, it does not pose a risk of exposing individuals or structures to potential adverse consequences, including the threat of loss, injury, or fatality due to strong seismic ground shaking.

To reiterate, the construction and operation of a BESS facility and the installation of a generator tie-line are not anticipated to induce significant seismic ground shaking. To guarantee the structural soundness of all structures within the Project site, strict adherence to the seismic requirements outlined in the CBC is essential. As per Section 105.1 of the CBC, any owner or authorized agent planning construction, alterations, or changes to a building or structure must first seek approval from the building official and secure the necessary permits from the building department prior to commencing any construction or placement of buildings, structures, or equipment on the property. Therefore, impacts related to seismic ground shaking would be less than significant and no mitigation would be required.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The Project site does not fall within a designated "Potential Liquefaction Area," as indicated on Exhibit S-3, Liquefaction and Landslides, from the City of Menifee in 2012. Furthermore, since the Project involves the construction and operation of a BESS facility and installation of a generator tie-line and does not entail the creation of habitable structures, it does not place individuals at risk of potential harm, injury, or loss associated with ground failure, including liquefaction. Therefore, impacts related to seismic related ground failure, including liquefaction, would be less than significant and no mitigation would be required.

iv) Landslides?

Less Than Significant Impact. The Project site falls outside the boundaries of a designated "Potential Landslide Area," as delineated in Exhibit S-3, Liquefaction and Landslides, from the City of Menifee in 2012. Additionally, considering that the Project entails the construction and operation of an unoccupied BESS facility and generator tie-line, it does not place individuals at risk of potential harm, injury, or loss associated with landslides. As a result, the expected impacts would be deemed insignificantly low. Therefore, impacts related to landslides would be less than significant and no mitigation would be required.

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

Less Than Significant Impact. Soil erosion may potentially occur during the construction of the Project, particularly during grading and other ground-disturbing activities. This could happen when surface soils are excavated and exposed to wind events or when they come into contact with a water source, leading to erosional effects. To address this concern, the Project would be required to comply with erosion and sediment control measures and the National Pollution Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit). Further, the Project will

formulate a Stormwater Pollution Prevention Plan (SWPPP). This plan will provide a comprehensive outline of how erodible soils will be safeguarded during the various phases of grading, construction, and the operation of the proposed BESS facility.

The SWPPP will delineate site-specific BMPs aimed at effectively managing erosion, sediment, and other potential pollutants associated with construction to prevent them from entering downstream waterbodies. Additionally, the SCE Valley Substation improvements would utilize SCE BMPs. With the preparation of a SWPPP and implementation of BMPs, impacts related to soil erosion or loss of top soil would be less than significant and no mitigation would be required.

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. Considering the information provided by the City of Menifee GP and the Geotechnical Engineering Report (Appendix G), the liquefaction potential at the Project site is deemed to be low. Further, the Bruin Geotechnical Study concluded that due to relatively dense and firm soil encountered during the subsurface investigation and the absence of a shallow groundwater table, the potential for liquefaction is low, and therefore, the Project site has a low susceptibility to liquefaction.

However, the Project's location does not fall within any known potential liquefaction area or identified landslide area, as specified in Exhibit S-3, Liquefaction and Landslides, by the City of Menifee in 2012. Compliance with relevant regulatory standards, including the Watershed Protection Ordinance, grading ordinance, and CBC, would be mandatory, further diminishing the potential for Project-related impacts associated with hazards or risks related to landslides, lateral spreading, subsidence, liquefaction, or structural collapse.

Moreover, regulatory controls to address potential geologic and seismic hazards would be imposed on the Project through the permitting process. Pursuant to MMC Section 8.04.010, the City has adopted the 2019 CBC, subject to certain amendments and changes. CBC design standards correspond to the level of seismic risk in a given location and are intended primarily to protect public safety and secondly to minimize property damage. The Project would be subject to compliance with all applicable regulations in the most recently published CBC (as amended by MMC 8.04.010), which specifies design requirements to mitigate the effects of potential geologic and seismic hazards.

Standard Condition of Approval **COA-GEO-1** requires that the Applicant comply with the recommendations of the geotechnical report and any revisions deemed necessary by the City's Building Official and/or Engineering/Public Works Director. The Menifee Building and Safety Department and Engineering/Public Works Department would review construction plans for compliance with the MMC/CBC and the Geotechnical Interpretive Report's recommendations. Following compliance with standard engineering practices, the Geotechnical Interpretive Report's recommendations (**COA-GEO-1**), and the established regulatory framework (i.e., MMC and CBC), the Project's potential impacts concerning exposure of people or structures to potential substantial adverse effects involving geologic and seismic hazards, and unstable conditions, would be less than significant. Moreover, it's unlikely the Project, including improvements to the SCE Valley Substation, would exacerbate any preexisting underlying hazards or risks related to landslides, lateral spreading, subsidence, liquefaction, or structural collapse. 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. There is no indication that the Project site is 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. The Bruin Geotechnical Stud concluded that the site has an expansion index of 18 and a soli expansion classification of "very low". Additionally, improvements to the SCE Valley Substation would utilize SCE BMPs for expansive soils if they are encountered during geological investigation. Therefore, impacts related to risk of life or property due to expansive soils, as defined in Table 18-1-B of the Uniform Building Code 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. As no permanent O&M facilities are proposed, the Project, including the SCE Valley Substation improvements, would not utilize septic tanks or alternative waste water disposal systems. Therefore, no impact would occur in this regard.

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

Less than significant with mitigation. To determine the paleontological sensitivity of the Project site, Dudek performed a paleontological resources inventory and preconstruction survey in compliance with the CEQA and Society of Vertebrate Paleontology (SVP) (SVP 2010) guidelines (Appendix H). The inventory consisted of Natural History Museum of Los Angeles County (NHMLA) and Western Science Center (WSC) paleontological records searches, an intensive paleontological survey, and a review of geological mapping and geological and paleontological literature.

No paleontological resources were identified within the Project site or a one-mile radius buffer as a result of the institutional records search, desktop geological and paleontological review, and intensive pedestrian survey however, the NHMLA and WSC reported fossil localities in the vicinity of the Project site from the same sediments that underlie the Project site on the surface and/or at depth. Additionally, the Project site is not anticipated to be underlain by a unique geological feature. The late to middle Pleistocene old alluvial fan deposits underlying the entirety of the Project site have high paleontological sensitivity or potential. Based on the records search results and map and literature review, the Project site has high potential to produce paleontological resources during planned construction activities. In the event that intact paleontological resources are discovered on the Project site, ground-disturbing activities associated with construction of the Project, such as grading and large diameter drilling during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. The potential for Project activities to damage paleontological resources during construction would result in a potentially significant impact. Standard Conditions of Approval **COA-GEO-2** and **COA-GEO-3** presented below, would reduce potentially significant impacts to a less-than-significant level by requiring preparation of a Paleontological Resources Impact Mitigation Program which would involve pre-construction worker awareness training as well as paleontological monitoring and discovery protocol, treatment, reporting, and collection management. The SCE Valley Substation is located on a previously disturbed site, however the substation improvements would require ground disturbing

activities that could encounter paleontological resources if substantial depth is required. SCE would implement BMPs to ensure that impacts to paleontological resources are reduced to less than significant.

Standard Conditions of Approval

COA-GEO-1: Geotechnical Recommendations

Prior to issuance of a grading permit, the Project applicant shall demonstrate, to the satisfaction of the City of Menifee Building & Safety Department Official and/or City of Menifee Engineering/Public Works Director, that the recommendations for design and construction identified in the *Geotechnical Engineering Report,* (Bruin, September 6, 2023), have been incorporated into the Project design, and grading and building plans. The Project's final grading plans, foundation plans, building loads, and specifications shall be reviewed by a State of California Registered Professional Geologist/Registered Professional Engineer to verify that the Geotechnical Interpretive Report recommendations have been incorporated/updated, as needed.

COA-GEO-2: Inadvertent Paleontological Find.

Should fossil remains be encountered during site development:

1) All site earthmoving shall be ceased in the area where the fossil remains are encountered. Earthmoving activities may be diverted to other areas of the site.
2) The applicant shall retain a qualified paleontologist approved by the County of Riverside. The paleontologist shall determine the significance of the encountered fossil remains.
3) Paleontological monitoring of earthmoving activities will continue thereafter on an as-needed basis by the paleontologist during all earthmoving activities that may expose sensitive strata. Earthmoving activities in areas of the Project area where previously undisturbed strata will be buried but not otherwise disturbed will not be monitored. The supervising paleontologist will have the authority to reduce monitoring once he/she determines the probability of encountering any additional fossils has dropped below an acceptable level.
4) If fossil remains are encountered by earthmoving activities when the paleontologist is not on-site, these activities will be diverted around the fossil site and the paleontologist called to the site immediately to recover the remains.
5) Any recovered fossil remains will be prepared to the point of identification and identified to the lowest taxonomic level possible by knowledgeable paleontologists. The remains then will be curated (assigned and labeled with museum* repository fossil specimen numbers and corresponding fossil site numbers, as appropriate; placed in specimen trays and, if necessary, vials with completed specimen data cards) and catalogued, and associated specimen data and corresponding geologic and geographic site data will be archived (specimen and site numbers and corresponding data entered into appropriate museum repository catalogs and computerized databases) at the museum repository by a laboratory technician. The remains will then be accessioned into the museum*

repository fossil collection, where they will be permanently stored, maintained, and, along with associated specimen and site data, made available for future study by qualified scientific investigators.

6) *The City of Menifee must be consulted on the repository/museum to receive the fossil material prior to being curated.

COA-GEO-3: Paleontological Resources Impact Mitigation Program and Paleontological Monitoring. Prior to commencement of any grading activity on site, the Project applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) 2010 guidelines to prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project. The PRIMP shall be consistent with the SVP (2010) guidelines and outline requirements for: preconstruction meeting attendance and worker environmental awareness training; where paleontological monitoring is required within the Project site based on construction plans and/or geotechnical reports; and, procedures for adequate paleontological monitoring and discoveries treatment, including paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. The PRIMP shall also include a statement that any fossil lab or curation costs (if necessary due to fossil recovery) are the responsibility of the Project applicant.

In addition, a qualified paleontological monitor shall be on site during initial rough grading and other significant ground-disturbing activities (including augering) in areas underlain by old alluvial fan deposits. No paleontological monitoring is necessary during ground disturbance within artificial fill, if determined to be present. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will allow grading to recommence in the area of the find.

3.8 Greenhouse Gas Emissions

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

Source: Menifee GP; Menifee GP Draft EIR.

Applicable General Plan Policies:

Goal OSC-4. Efficient and environmentally appropriate use and management of energy and mineral resources to ensure their availability for future generations.

Policy OSC-4.1. Apply energy efficiency and conservation practices in land use, transportation demand management, and subdivision and building design.

Goal OSC-10. An environmentally aware community that is responsive to changing climate conditions and actively seeks to reduce local greenhouse gas emissions.

Policy OSC-10.1. Align the City's local GHG reduction targets to be consistent with the statewide GHG reduction target of AB 32.

Policy OSC-10.2. Align the City's long-term GHG reduction goal consistent with the statewide GHG reduction goal of Executive Order S-03-05.

Policy OSC-10.3. Participate in regional greenhouse gas emission reduction initiatives.

Policy OSC-10.4. Consider impacts to climate change as a factor in evaluation of policies, strategies, and projects.

Significance Analysis and Determination:

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

Less Than Significant Impact. The Project would include the development of a BESS facility. This BESS facility would utilize lithium-ion batteries that would connect to the existing off-site infrastructure leading to the SCE Valley Substation.

The construction and operation of the Project, including the improvements to the SCE Valley Substation, are not anticipated to generate GHG emissions that would have a significant impact on the environment. The Project's construction timeline is expected to span 12-18 months, with commercial operation scheduled for 2025.[16] While construction activities may necessitate the use of construction equipment and vehicles, emissions during this period are expected to be temporary. The Project would comply with City of Menifee regulations regarding construction hours, minimizing potential impacts.

Operationally, the Project, including the SCE Valley Substation improvements, would have minimal GHG emissions. Any GHG emissions would be related to employee trips to and from the Project and maintenance vehicles used during normal O&M procedures. The Project consists of a BESS facility that will utilize lithium-ion batteries to store electrical energy and then discharge it to the grid when customer demand is high. This would allow electrical providers to maintain status quo generation rates rather than reacting to the demand fluctuations throughout the day. This would allow electrical providers to avoid increasing

[16] The analysis assumes a construction start date of April 2024, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

production, which in turn decreases GHG emissions, to meet customer demand. The Project would prevent the waste of electrical energy which is still primarily produced via fossil fuels in the state. Overall, the Project would provide a net benefit with regard to GHG emissions. As such, impacts would be less than significant as it relates to operational GHG emissions.

Additionally, the Project is designed to store and provide electricity during periods of high demand, which can help offset GHG emissions associated with the use of fossil fuels for electricity generation. Therefore, the overall impact of the Project on GHG emissions is anticipated to be less than significant.

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

Less Than Significant Impact. The Project, including the SCE Valley Substation improvements, is not expected to hinder the implementation of any relevant plans, policies, or regulations aimed at reducing GHG emissions.

Regarding the alignment with AB 32/2017 Scoping Plan, the 2017 Scoping Plan Update sets forth a target of achieving a 40% reduction in GHG emissions below 1990 levels by 2030, in line with Executive Order B - 30 - 15 and Senate Bill (SB) 32. The Project would make a significant contribution to these objectives by providing intermittent renewable energy storage during periods of low energy production and high demand.

SB 1020 is instrumental in California's ambition to reach 100% renewable energy by 2045. One of the major challenges with renewable energy sources, such as wind and solar power, is their intermittent generation of electricity. This necessitates the use of electrical storage solutions like BESS facilities. The Project would play a direct and crucial role in supporting the state's renewable energy goals by providing batteries for charging and discharging.

Furthermore, SCE has set an ambitious target of procuring 80% of the electricity supplied to the grid from carbon-free sources. Achieving this goal is contingent on having sufficient energy storage capacity, especially for intermittent renewable energy generation from sources like wind and solar. The Project would play a pivotal role in advancing this objective by providing energy storage capacity for the electric grid. Due to the less than significant impact, no mitigation is required.

Mitigation Measures: No mitigation is required.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
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 that 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 has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Sources: Menifee GP; Menifee GP Draft EIR; Department of Toxic Substances Control (DTSC); U.S. EPA; U.S. Department of Transportation; Hazardous Materials Transportation Act; California Division of Occupational Safety and Health; Riverside County Airport Land Use Commission; Phoenix Regional Standard Operating Procedures. Battery Energy Storage Systems; Department of Toxic Substances Control EnviroStor; DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List); State Water Resource Control Board; Integrated Waste Board (SWF/LS); CCR Title 24 Parts 2 and 9 – Fire Codes; California PRC Sections 4290-4299; General Code Section 51178; MMC Chapter 8.20, Fire Code; 2021 International Fire Code; California Fire Code; Senate Bill 38; NFPA 855 Standard for the Installation of Stationary Energy Storage Systems; UL 9540 Riverside County Fire Department; Menifee Police Department; State Water Resources Control Board, GeoTracker; Exhibit S-6, "High Fire Hazard Areas," Exhibit S-7, "Critical Facilities," and Exhibit S-9, "Evacuation Routes;" All Hazards Site Search; California Department of Forestry and Fire Protection's (CAL FIRE) California Fire Hazard Severity Zone Viewer. **Appendix I** *Fire Protection - Hazards Mitigation Analysis for AES Corporation Lithium-Ion Battery Enclosures Double Butte Outdoor Energy Storage System* (Coffman Engineers, 2024)

Applicable General Plan Policies:

Goal S-5. A community that has reduced the potential for hazardous materials contamination.

Policy S-5.1. Locate facilities involved in the production, use, storage, transport, or disposal of hazardous materials away from land uses that may be adversely impacted by such activities and areas susceptible to impacts or damage from a natural disaster.

Policy S-5.2. Ensure that the fire department can continue to respond safely and effectively to a hazardous materials incident in the City, whether it is a spill at a permitted facility, or the result of an accident along a section of the freeway or railroads that extend across the City.

Policy S-5.4. Ensure that all facilities that handle hazardous materials comply with federal and state laws pertaining to the management of hazardous wastes and materials.

Policy S-5.5. Require facilities that handle hazardous materials to implement mitigation measures that reduce the risks associated with hazardous material production, storage, and disposal.

Policy S-5.6. Require all new industrial development projects and significant rehabilitation or expansion projects to reduce industrial truck idling by enforcing California's five (5) minute maximum law, requiring warehouse and distribution facilities to provide adequate on-site truck parking, and requiring refrigerated warehouses to provide generators for refrigerated trucks. Require air pollution point sources to be located at safe distances from sensitive sites such as homes and schools.

Goal S-6. A City that responds and recovers in an effective and timely manner from natural disasters such as flooding, fire, and earthquakes, and as a result is not impacted by civil unrest that may occur following a natural disaster.

Policy S-6.1. Continuously review, update, and implement emergency preparedness, response, and recovery plans that make the best use of the City- and county-specific emergency management resources available.

Significance Analysis and Determination:

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. A typical project that could result in a significant hazard to the public includes projects that routinely transports, uses, or disposes of hazardous materials. The routine use, transport, or disposal of hazardous materials is primarily associated with industrial uses that require such materials for operations or produce hazardous wastes as by-products of production applications.

BESS systems are electrochemical devises that charge or collect energy from the grid and then discharge that energy at a later time to provide electricity or other grid services when needed. The Project consists of a BESS facility that would implement and utilize lithium-ion batteries that would interconnect with the existing high-voltage SCE 500 kV Valley Substation. Lithium-ion batteries do not produce any exhaust gases during normal operation. During Project operations, no significant hazardous materials would be present

under normal conditions. Regular operation and maintenance of the Project structures would not result in significant impacts involving use, storage, transport or disposal of hazardous wastes and substances. Additionally, the Project site is not included on the list of hazardous waste sites (Cortese List) complied by the Department of Toxic Substances Control (DTSC) pursuant to Government Code Section 65962.5 and therefore would not release known hazardous materials due to ground-disturbing activities.

Both the EPA and the U.S. Department of Transportation regulate the transport of hazardous waste and material, including transport via highway. The EPA administers permitting, tracking, reporting, and operations requirements established by the Resource Conservation and Recovery Act. The U.S. Department of Transportation regulates the transportation of hazardous materials through enforcement of the Hazardous Materials Transportation Act. This act includes requirements for container design and labeling, as well as for driver training. The established regulations are intended to track and manage the safe interstate transportation of hazardous materials and waste. Additionally, State and local agencies enforce the application of these acts and coordinate safety and mitigation responses in the case that accidents involving hazardous materials occur.

The proposed Project does not propose or facilitate any activity involving significant use, routine transport, or disposal of hazardous substances. The use and handling of hazardous materials during construction would occur in accordance with applicable federal, State, and local laws, including Cal/OSHA requirements.

Therefore, due to the requirements which regulate hazardous substances outlined above and the fact that the initial planning, ongoing, monitoring, and inspections will occur in compliance with local, state, and federal regulation, the Project, including improvements to the SCE Valley Substation, would not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances. As such, 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?

Less Than Significant Impact. All BESS facilities contain quantities of hazardous materials, and in the event of an emergency or failure, can potentially create a toxic environment. BESS facility failure can occur due to thermal abuse, physical/mechanical damage, electrical abuse, environmental impacts, internal faults within the battery cell, and other electrical faults or system failures, etc.

Additionally, during normal operations of the Project, there would be the potential for hazards and accidents typical with that of other BESS operations. These hazards and potential accidents, while infrequent and minimized through routine maintenance and inspection, include, but are not limited to fires, explosions, and the release of toxic gases. The primary potential upset and accident condition for the Project would be the risk of a thermal runaway event occurring, where the system increases in temperature, in turn releasing energy that further increases temperature. This could potentially cause a fire due to the overheating of the battery system. A fire may release toxic chemicals into the air and atmosphere. There are no sensitive receptors immediately adjacent to the Project site.

Under normal operations, a BESS does not store or generate hazardous materials in quantities that would represent a risk to offsite receptors. Nonetheless, the Project would be required to comply with the City

MMC and fire code and with all local, state, and federal requirements related to Project design, operations, and accident responses. Further, the Project would be subject to and implemented in accordance with the National Fire Protection Association (NFPA), International Fire Code (IFC), Occupational Safety and Health Administration (OSHA), the California Fire Code (CFC), and California Environmental Protection Agency requirements. A Hazard Mitigation Analysis (HMA) (Appendix I) has been prepared for the Project as required by the Menifee Development Code (Title 9, Article 5: Special Use Standards, Chapter 9.297 Energy Storage Facilities). The HMA concluded that the risk of thermal runaway and or chemical release due to battery failure is low with compliance with CFC 1207 and other applicable codes and standards. Numerous nationally and internationally recognized standards and codes have been developed to inform safe manufacturing, construction, installation, and operation of energy storage systems. The HMA includes a detailed overview of the standards listed below.

2021 International Fire Code: contains regulations to safeguard against fires and other hazards and addresses general precautions, emergency planning and preparedness, fire department access and water supplies, automatic sprinkler systems, fire alarm systems, special hazards, and other matters.

California Fire Code BESSs are highly regulated under Chapter 12 of the CFC. These regulations set strict standards for installation and operation of such systems, including internal fire detection and suppression systems and require hazard assessments prior to commercial operation.

Senate Bill 38 signed into law by Governor Newsome in October 2023, amended Section 761.3 of the California Public Utilities Code to address safety concerns with battery energy storage (BESS) facilities. The law requires that every battery energy storage facility located in California establish an emergency response and emergency action plan that covers the facility. The owner/operator of the facility must coordinate with local emergency management agencies, unified program agencies, and local first responders to develop the response and action plan, establish a notification and communication procedure, and consider potential offsite impacts to the surrounding community and environment.

NFPA 855 Standard for the Installation of Stationary Energy Storage Systems: provides the minimum requirements for mitigating the hazards associated with energy storage systems. The design, installation, commissioning, operation, maintenance and decommissioning of energy storage Facilities must comply with standards outlined by NFPA 855. The standard includes site design standards such as maximum energy and spacing between units. Compliance with these standards is documented through several studies and reports that must be submitted to the regulating governmental entity, including 1) HMA, 2) Emergency Response Plan, 3) details of all safety systems, and more.

UL 9540 UL 9540 is the safety standard for energy storage equipment, including batteries, that is required under NFPA 855. NFPA 855 requires that batteries included in energy storage projects are listed to the safety specifications included in UL 9540 and undergo rigorous fire testing. This standard ensures that equipment incorporated into battery energy storage facilities are tested, certified and safe for operation on the electric grid

Concurrent with Project approval, approval of the HMA by the Menifee Fire Department is required. Upon approval of the HMA, the Menifee Fire Department will implement the necessary conditions of approval to ensure that any and all technologies used on-site will have proper accident procedures in place to mitigate any potential impacts from failures that could occur during normal operation of the Project.

Additionally, SCE would comply with all regulatory requirements and implement BMPs to ensure the safe handling and disposal of hazardous material and hazardous waste within the SCE valley Substation.

With adherence to the existing, applicable General Plan policies listed above, and all applicable standards and codes as discussed above, the proposed Project would not 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; impacts would be less than significant.

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?

No Impact. Based on aerial imagery and maps of the Project and surrounding area, Romoland Elementary School is located approximately 1,960 feet north of the Project site and SCE Valley Substation. As previously stated, the Project, including SCE Valley Substation improvements, would not emit hazardous materials or handle hazardous or acutely hazardous materials, substances, or waste during normal operation of the Project. Nevertheless, the Project would be required to adhere to all applicable Federal, State, and regional regulations regarding handling, transport, and disposal of hazardous materials. Due to no school being located within one-quarter mile of the Project site or SCE Valley Substation, no impact related to hazardous emissions and/or hazardous materials would result.

d) Would the project be located on a site that 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?

No Impact. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List is maintained by the DTSC. The sites for the list are designated by the State Water Resource Control Board (Leaking Underground Storage Tanks [LUST]), the Integrated Waste Board (SWF/LS), and the DTSC (Cal-Sites). A review of the Cortese list, as provided by Enterprise Deficiency Report has revealed that there are no Cortese site within the City of Menifee. No sites or facilities from the Cortese list are located on the Project site or the SCE Valley Substation. Therefore, the Project, including SCE Valley Substation improvements, would have no impact to the public or the environment in this regard.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project, including the SCE Valley Substation, is situated more than 2 miles away from any public Airport Influence Area, Airport Safety Zone, Avigation Easement, Overflight area, or Federal Aviation Administration Height Notification Surface area; however, the Project site is in the vicinity of a private heliport. The following airports/airstrips are located nearest the Project site:

- SCE San Jacinto Valley Service Center Heliport at 26100 Menifee Road, Romoland, California 92585, approximately 0.72 miles northeast of the Project site.
- Perris Valley Airport at 2091 Goetz Road, Perris California 92570 approximately 3.5 miles northwest of the Project site.

As the Project will be operated remotely, it is anticipated that there will be no considerable risk to individuals in the vicinity of the Project in terms of safety hazards or excessive noise emissions. Moreover, the Project does not involve the construction of any structures that could pose a safety risk to aircraft or disrupt airport/heliport operations. Therefore, the Project, including improvements to the SCE Valley Substation, would result in a less than significant impact regarding airport-/airstrip-related safety hazard for people residing or working in the vicinity of the Project.

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 of Menifee collaborates with local and regional emergency service organizations and personnel to conduct simulated emergency response exercises throughout the year. The City of Menifee and Menifee Police Department (MPD) routinely coordinate with Riverside County/CAL FIRE, Riverside County Emergency Management Department, and the local utility providers to discuss methods and response plans for various emergency scenarios that could potentially present themselves within the region. Additionally, the City makes available to resident's downloadable resources such as storm and emergency preparedness information via its website: https://www.cityofmenifee.us/418/Storm-and-Emergency-Preparedness. Vehicular access to the site will be provided via two driveways off Palomar Road along the eastern frontage of the site. Secondary access is provided via a driveway along San Jacinto Road on the western boundary. On-site parking is provided (12 parking stalls) to accommodate remote O&M workers that will visit the site each weekday and allow for emergency vehicles.

During construction of the Project, various off-site improvements would be completed, including but not limited to, the easterly half of San Jacinto Road, as measured from the roadway centerline, to the standards of a "Local Road." Improvements to San Jacinto Road would extend from McLaughlin Road to a terminus at the northwest corner of the Project site Additionally, the westerly half of Palomar Road, as measured from the roadway centerline, would be constructed to the standards of a "Collector Road". Improvements to Palomar Road would extend from McLaughlin Road to Case/Matthews Road. A segment of McLaughlin Road would be constructed to a "Rural Road" standard between San Jacinto Road and Antelope Road. Operationally, the Project does not propose any operations that would inhibit the use of public roadways such that access would be restricted. Furthermore, according to the Safety Element of the City's GP, none of the roadways adjacent to the Project site are designated as an emergency evacuation route. Therefore, impacts to an emergency response plan and emergency evacuation routes would be less than significant.

The SCE Valley Substation improvements would be entirely within the existing substation footprint and would not impede any public ROW, therefore no impacts would occur with regard to interfering with an adopted emergency response plan or evacuation plan as a result of the SCE Valley Substation improvements.

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 Project site, including the SCE Valley Substation, is not located within a Very High Fire Hazard Severity Zone (VHFHSZ), as identified on CAL FIRE's Fire Hazard Severity Zone (FHSZ) Viewer and Menifee GP Exhibit S-6, High Fire Hazard Areas. The Project site is located in a Local Responsibility Area. Local Responsibility Areas are incorporated cities, urban regions, agriculture lands, and portions of the desert where the local government is responsible for wildfire protection.

The Project would be subject to compliance with the CCR Title 24 Parts 2 and 9 – Fire Codes and California PRC Sections 4290-4299 and General Code Section 51178. The Project would also be subject to compliance with regulations pertaining to fire protection, including MMC Chapter 8.20, *Fire Code*. Further, it is the City's goal (Goal S-4) for a community that has effective fire mitigation and response measures in place, and as a result is minimally impacted by wildland and structure fires. To this end, the Project would be subject to compliance with the following City policies:

- **Policy S-4.1:** Require fire-resistant building construction materials, the use of vegetation control methods, and other construction and fire prevention features to reduce the hazard of wildland fire.
- **Policy S-4.2:** Ensure, to the maximum extent possible, that fire services, such as firefighting equipment and personnel, infrastructure, and response times, are adequate for all sections of the City.
- **Policy S-4.4:** Review development proposals for impacts to fire facilities and compatibility with fire areas or mitigate.

The Riverside County Fire Department (RVCFD) provides fire protection and emergency medical response services in the City of Menifee. The nearest fire station to the Project site is Fire Station #07 located approximately 2.35 miles southwest at 28349 Bradley Road in Menifee California. In coordination with the RVCFD and CAL FIRE, the RVCFD would evaluate the Project to determine the necessary fire prevention features. Following compliance with the established local and state regulatory framework discussed above, the Project would not expose people or structures to a significant risk involving wildland fires and impacts would be less than significant in this regard.

The SCE Valley Substation improvements would be constructed within the existing substation footprint which is heavily disturbed and denuded of vegetation. Access to the Valley Substation would be from existing access points and no roads would be constructed for the use of the Valley Substation, therefore the Project, including the SCE Valley Substation would result in a less-than-significant impact.

Mitigation Measure: No mitigation is required.

3.10 Hydrology and Water Quality

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	**HYDROLOGY AND WATER QUALITY** – Would the project:				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 flooding on- or offsite;	☐	☐	☒	☐
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?	☐	☐	☒	☐

Sources: Menifee GP; Menifee GP Draft EIR; MMC; NPDES; Riverside County Flood Control and Water Conservation District (RCFC&WCD) (CAS618033, Order No. R8-2010-0033); California Department of Water Resources, Dam Breach Inundation Web Publisher; Menifee GP, Exhibit S-5 Flood Hazards.

Applicable General Plan Policies:

Goal S-3. A community that is minimally disrupted by flooding and inundation hazards.

Policy S-3.1. Require that all new developments and redevelopments in areas susceptible to flooding (such as the 100-year floodplain and areas known to the City to flood during intense or prolonged rainfall events) incorporate mitigation measures designed to mitigate flood hazards.

Policy S-3.2. Reduce flood hazards in developed areas known to flood.

Policy S-3.6. Coordinate with FEMA to ensure that flood mapping and flood risk information is current and available.

Goal OSC-7. A reliable and safe water supply that effectively meets current and future user demands.

Policy OSC-7.1. Work with the Eastern Municipal Water District to ensure that adequate, high-quality potable water supplies and infrastructure are provided to all development in the community.

Policy OSC-7.2. Encourage water conservation as a means of preserving water resources.

Policy OSC-7.6. Work with the Eastern Municipal Water District to maintain adopted levels of service standards for sewer service systems.

Policy OSC-7.7. Maintain and improve existing level of sewer service by improving infrastructure and repairing existing deficiencies.

Policy OSC-7.8. Protect groundwater quality by decommissioning existing septic systems and establishing connections to sanitary sewer infrastructure.

Policy OSC-7.9. Ensure that high-quality potable water resources continue to be available by managing stormwater runoff, wellhead protection, and other sources of pollutants.

Policy OSC-7.10. Preserve natural floodplains, including Salt Creek, Ethanac Wash, Paloma Wash, and Warm Springs Creek, to facilitate water percolation, replenishment of the natural aquifer, proper drainage, and prevention of flood damage.

Policy OSC-7.11. Ensure that natural and cultural resources are protected and avoided while still maintaining important water goals.

Significance Analysis and Determination:

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. The Project's proposed construction activities include excavation, grading, and trenching which would displace soils and temporarily increase the potential for degradation of water quality in the Project area. Soil erosion may potentially occur during the construction of the Project, particularly during grading and other ground-disturbing activities. This could happen when surface soils are excavated and exposed to wind events or when they come into contact with a water source, leading to erosional effects. The Project site contains a jurisdictional aquatic feature which could be impacted during construction. To address this concern, the Project would be required to comply with erosion and sediment control measures and the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit). Further, the Project will formulate a SWPPP. This plan will provide a comprehensive outline of how erodible soils will be safeguarded during the various phases of grading, construction, and the operation of the proposed BESS facility to reduce potential impacts related to discharges that would impact water quality. The SWPPP will delineate site-specific BMPs aimed at effectively managing erosion, sediment, and other potential pollutants associated with construction to prevent them from entering downstream waterbodies. BMPs would also be required for SCE Valley Substation improvements. With the preparation of a SWPPP and implementation of BMPs impacts related to soil erosion or loss of top soil would be less than significant and no mitigation would be required.

Further, MMC Chapter 15.01, Storm Water/Urban Runoff, addresses stormwater and runoff pollution control and is intended to reduce the quantity of pollutants being discharged to waters of the United States. MMC Section 15.01.015(B)(1) specifies that any person performing construction work in the City shall

comply with the provisions of MMC Chapter 15.01 and control stormwater runoff so as to prevent any likelihood of adversely affecting human health or the environment. Prior to issuance of a grading permit the Director of Public Works would identify the BMP's that may be implemented to prevent such deterioration and the manner of implementation. Documentation on the effectiveness of BMP's implemented to reduce the discharge of pollutants to the Municipal Separate Storm Sewer System (MS4) would be required when requested by the Director of Public Works.

Following compliance with NPDES and MMC requirements, the Project's construction-related activities would not violate water quality or waste discharge requirements. Additionally, the Project would be subject to the Western Riverside MSHCP Consistency Approval and the Riverside County Flood Control and Water Conservation District Encroachment Permit. A less than significant impact would occur in this regard and no mitigation is required.

Operation of the proposed BESS would increase impervious surfaces that could contribute to erosion resulting in degradation of water quality. Project design incorporates a landscape plan that includes hardscaping, drought resistant vegetation, and stormwater basins to contain storm water flows that would otherwise contribute to water quality. Inclusion of hardscaping and vegetation would stabilize soils during the life of the Project reducing erosion. A Project-specific Water Quality Management Plan (WQMP) has been prepared to ensure the Project's compliance with regulations pertaining to water quality and waste discharge (see Appendix C).

Urban stormwater runoff is covered under the municipal permit for Riverside County, the NPDES MS4 Permit for stormwater and non-stormwater discharges from the MS4 within the Riverside County Flood Control and Water Conservation District (CAS618033, Order No. R8-2010-0033). The City of Menifee is a Co-Permittee (Discharger) under the MS4 Permit. Each Co-Permittee is required to ensure that an appropriate WQMP is prepared for "New Development" (and "Significant Redevelopment") Projects for which a map or permit for discretionary approval is sought. The New Development category includes new developments that create 10,000 square feet or more of impervious surface (collectively over the entire Project site). The WQMP is required to include site design (including, where feasible, Low Impact Development [LID] principles), Source Control and Treatment Control elements to reduce the discharge of pollutants in urban runoff. Surface drainage from the Project site would be directed through the Project site storm drain system to two detention basins on the southwest perimeter of the site. The Romoland Drainage Channel route flows along the southern boundary of the Project site, into the City of Menifee municipal storm drain system. The proposed drainage design will utilize two new bioretention basins to meet LID requirements for Riverside County before discharging into the Romoland Stormwater Channel to the south of the site. Additionally, MMC Section 15.01.015(C) specifies that new development Projects shall control stormwater runoff so as to prevent any deterioration of water quality that would impair subsequent or competing uses of the water. The Director of Public Works would identify the BMP's that may be implemented to prevent such deterioration and identify the manner of implementation. Documentation on the effectiveness of BMP's implemented to reduce the discharge of pollutants to the MS4 is required when requested by the Director of Public Works. BMPs would also be required for SCE Valley Substation improvements.

Following compliance with the existing water quality regulatory framework (i.e., NPDES and MMC), including implementation of BMP's specified in the Project WQMP. Project operations would not violate water quality or waste discharge requirements. A less than significant impact would occur, and no mitigation is required.

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. **Construction.** Water would be required during the construction phase for such activities as dust suppression, soil compaction, and grading. Water may also be used at points of ingress/egress to minimize the tracking of dirt off-site onto local roadways from construction vehicles. Water usage during construction, primarily for dust-suppression purposes, is not expected to exceed 9 acre-feet over the 18-month construction phase. Water required during construction would be supplied a local water purveyor Bottled water would be provided to the construction workers. Additionally, on-site restroom facilities for the construction workers would be provided by portable units to be serviced by licensed providers; no connection to a public sewer system is required for Project construction, and therefore water for such purposes is not required. The SCE Valley Substation improvements, which would primarily involve modifications to existing substation equipment, would be constructed within the existing substation footprint and would not require use of new groundwater sources during construction or result in new impervious surface area that could potentially affect groundwater recharge.

Since the Project does not propose to utilize groundwater during construction activities, the Project, including improvements to the SCE Valley Substation, would not result in a significant impact related to the substantial depletion of groundwater supplies during construction. Therefore, impacts would be less than significant.

Operation. Water demand for operational activities would require minimal water resources. During the life of the Project water would be required for landscape irrigation. The Project has identified a max allowable water allowance (MAWA) for landscaping irrigation of 3,242.056.73 gallons per year and an estimated total water use of 2,780,196 gallons per year

The Project would not significantly impact local groundwater recharge because it does not presently occur on the Project site. The Project does not have any DMAs with a seasonal high groundwater mark shallower than 10 feet. No sensitive stream habitat areas will be adversely affected and are not identified on the Co-Permittees Hydromodification Susceptibility Maps. The Project would not substantially reduce runoff that results in groundwater recharge.

According to the WQMP, LID Principles and LID BMPs have been incorporated into the site design to fully address all Drainage Management Areas. With compliance of the WQMP, LID Principles, and BMPs, impacts would be less than significant, and no mitigation is required.

c) 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:

i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. As discussed above, construction of the Project, including the SCE Valley Substation improvements, would include grading of the Project site which has the potential to modify the existing drainage patterns, potentially leading to erosion or siltation. Further, erosion or siltation could occur when surface soils are excavated and exposed to wind events or when they come into contact with a water source, leading to erosional effects. The Project site contains a jurisdictional aquatic feature which could

be impacted during construction. To address this concern, the Project would be required to comply with erosion and sediment control measures and the National Pollution Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit). Further, the Project will formulate a SWPPP. This plan will provide a comprehensive outline of how erodible soils will be safeguarded during the various phases of grading, construction, and the operation of the proposed BESS facility to reduce potential impacts related to discharges that would impact water quality. The SWPPP will delineate site-specific BMPs aimed at effectively managing erosion, sediment, and other potential pollutants associated with construction to prevent them from exiting the Project site. With the preparation of a SWPPP and implementation of BMPs impacts related to soil erosion or siltation during construction would be less than significant and no mitigation would be required.

The Project incorporates landscaping that would stabilize soils and two onsite retention basins which would direct storm flows and limit erosion and siltation during operations. With the incorporation of these Project designs, impacts related to soil erosion or siltation during operation would be less than significant and no mitigation would be required.

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

Less Than Significant Impact. As noted above, the Project would increase impervious surfaces within the Project site. However, the Project would incorporate two bio-retention basins utilizing LID principles to control surface run-off. Stormwater would then be directed to the Romoland Drainage Channel route which flows along the southern boundary of the Project site, into the City of Menifee municipal storm drain system. Due to surface run-off being managed onsite and directed to the nearby municipal storm drain system, impacts would be less than significant, and no mitigation would be required.

The SCE Valley Substation improvements would take place within the existing substation footprint and would not increase the amount of impervious surface area or otherwise increase the rate, amount, or depth of surface runoff. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. See responses above (3.10 a.; 3.10 c.i - ii.)

iv) Impede or redirect flood flows?

Less Than Significant Impact. See responses above (3.10 a.; 3.10 c.i - ii.)

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

Less than Significant Impact. While the Project site, including the SCE Valley Substation, is not located near a mapped dam inundation area, a tsunami inundation zone and is not along the shoreline of a lake or reservoir, eliminating the risk of inundation by a seiche. The Project site does fall within a zone corresponding to 100-year flood areas as per Exhibit S-5 of the Menifee GP. Under normal operations, a

BESS does not store or generate hazardous materials in quantities that would represent a risk to offsite receptors. Nonetheless, the Project has prepared a hazard mitigation analysis and report and will prepare an emergency response and evacuation plan as required by SB 38. This will ensure that any and all technologies used on site will have proper accident procedures in place to mitigate any potential impacts from failures that could occur in the event of Project inundation from a flood.

With adherence to the existing, applicable General Plan policies listed above, the risk of release of pollutants due to Project inundation would be less than significant.

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 discussed above (3.10 a.-c.i.) the Project would adhere to all required water quality regulation and water quality control plans. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Additionally, SCE Valley Substation improvements would not increase water demand associated with operation and maintenance of the existing substation or result in additional impervious surface area that could potentially affect groundwater recharge. Project impacts, including the SCE Valley Substation improvements, related to implementation of a water quality control plan or sustainable groundwater management plan would be less than significant, and no mitigation is required.

Mitigation Measures: No mitigation is required.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
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?	☐	☐	☐	☒

Sources: Menifee GP; Menifee GP Draft EIR; Menifee North Specific Plan and Land Use Map; Menifee GP, Exhibit LU-3 Land Use Designations; Comprehensive Development Code; Menifee Zoning Map.

Applicable General Plan Policies:

Goal LU-1. Land uses and building types that result in a community where residents at all stages of life, employers, workers, and visitors have a diversity of options of where they can live, work, shop, and recreate within Menifee.

Policy LU-1.1. Concentrate growth in strategic locations to help preserve rural areas, create place and identity, provide infrastructure efficiently, and foster the use of transit options.

Policy LU-1.5. Support development and land use patterns, where appropriate, that reduce reliance on the automobile and capitalize on multimodal transportation opportunities.

Policy LU-1.6. Coordinate land use, infrastructure, and transportation planning and analysis with regional, county, and other local agencies to further regional and subregional goals for jobs-housing balance.

Policy LU-1.8. Ensure new development is carefully designed to avoid or incorporate natural features, including washes, creeks, and hillsides.

Policy LU-1.9. Allow for flexible development standards provided that the potential benefits and merit of projects can be balanced with potential impacts.

Policy LU-1.10. Buffer sensitive land uses, such as residences, schools, care facilities, and recreation areas from major air pollutant emission sources, including freeways, manufacturing, hazardous materials, storage, and similar uses.

Significance Analysis and Determination:

a) Would the project physically divide an established community?

No Impact. The Project involves the construction, operation, and maintenance of a BESS facility on approximately 27 acres within the City of Menifee. The vicinity surrounding the Project site primarily comprised of industrial uses including the decommissioned IEEC, which is now undergoing redevelopment for an approved BESS project (Nova Power Bank Project), high voltage transmission lines, a Riverside County Flood Control channel, RCTC rail line, commercial and industrial properties, vacant land, and the SCE transmission corridor which connects to the SCE Valley Substation located approximately 0.25 miles east of the Project site. The Project site is currently vacant land. Given the Project's nature, scope, and location, the Project would not physically divide an established community. No impact would occur in this regard and no mitigation is required.

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 Menifee GP and Land Use Map depicts the City's land use designations and indicates the Project site is designated as Menifee North Specific Plan No. 260 - Planning Area 3. The Project would construct, operate, and maintain a BESS facility to store electrical energy from the grid to be discharged later when customer demand is high. The Menifee North Specific Land Use Plan indicates the Project site is zoned industrial.

Further, Ordinance 2023-369 approved amendments to the Menifee Development Code (LR 22-0130) and Menifee North Specific Plan No. 260 (Battery Storage Ordinance), allowing the development of Utility Scale BESS within Menifee North Specific Plan No. 260 Planning Areas 2 and 3. Development of BESS with a conditional use permit. The Project meets the definition of a BESS as defined in Section 9.297.020 (Article 5) of the Menifee Development Code. The development code applies standards to ensure the public health, safety, and welfare of the Menifee community. Standards include landscaping and visual screening

requirements, on-site parking for employees, and an HMA to be approved concurrent with Project approvals. Additionally, the following Performance Measures and Standard Conditions of Approval apply to all BESS projects:

- Facilities shall not store any products, goods, materials, or containers outside of any building on-site.
- Facilities shall comply with Chapter 9.210 Noise Control Regulations of the City of Menifee Municipal Code.
- Operators shall address any nuisance, safety issues or violations of conditions of approval within forty-eight hours of being notified by the city that an issue exists.
- Prior to the issuance of a Certificate of Occupancy or Business License, any operator of an energy storage facility shall sign a statement acknowledging acceptance of all operational conditions of approval associated with the approved entitlements for the facility.

The Project is required to show that it provides a net-positive economic benefit to the City and shall enter into a legally binding agreement to fund certain community improvements, as agreed to by the City and the developer.

The Project has been designed consistently with the landscaping and visual screening required by the development code, including a seven-foot decorative concrete masonry, non-scalable exterior wall, 4.83 acres of perimeter landscaping, and 12 on-site parking spaces (see Figure 5: Preliminary Landscape Plan). A Hazard Mitigation Analysis (Appendix I) has been prepared for the Project and provides a full assessment and mitigation of potential hazards related to the Project.

Further, the SCE Valley Substation improvements, which would primarily consist of modification of existing equipment, would also be in accordance with the existing allowable uses for the substation.

Therefore, the Project would be consistent with the applicable land use plans. Given that the Menifee North Specific Plan No 260 EIR considered the potential environmental impacts associated with the development of the Project site assuming the industrial land use designation, and the Project's compliance with the applicable BESS development standards, this Project, including improvements to the SCE Valley Substation, would not create any new or greater environmental impacts than those identified in the Menifee North Specific Plan No 260 EIR and therefore no impact would occur.

Mitigation Measures: No mitigation is required.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Sources: Menifee GP; Menifee GP Draft EIR; Menifee GP, Exhibit OSC-3: Mineral Resource Zones; and California Department of Conservation's Mines Online.

Applicable General Plan Policies:

Goal OSC-4. Efficient and environmentally appropriate use and management of energy and mineral resources to ensure their availability for future generations.

Policy OSC-4.4. Require that any future mining activities be in compliance with the State Mining Reclamation Act, federal and state environmental regulations, and local ordinances.

Policy OSC-4.5. Limit the impacts of mining operations on the City's natural open space, biological and scenic resources, and any adjacent land uses.

Significance Analysis and Determination:

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?

The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the known of inferred mineral potential of the area. Under SMARA, areas are categorized into MRZs as follows:

MRZ-1 Areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.

MRZ-2 Areas where the available geologic information indicates that there are significant mineral deposits or that there is a likelihood of significant mineral deposits. However, the significance of the deposit is undetermined.

MRZ-3 Areas where the available geologic information indicates that mineral deposits are inferred to exist; however, the significance of the deposit is undetermined.

MRZ-4 Areas where there is not enough information available to determine the presence or absence of mineral deposits.

No Impact. The closest mining facilities to the Project site and SCE Valley Substation are the Juniper Flats Pits which are Open Pits with sand and gravel as the primary product. The Project site is located in a regional SMARA Mineral Land Classification. No mineral resources are known to exist on the Project site. An area approximately 2.15 miles west of the site is identified as an MRZ-1 area. However, this area

is mostly developed with residential dwelling units and, according to aerial photography, there are no signs of mining activities present. Implementation of the Project would not deplete mineral deposits or involve mining activities. Furthermore, the Project site is not located in an area identified as a locally important mineral resource recovery site and is not a mining area. Therefore, the Project, including the SCE Valley Substation improvements, would not result in the loss of availability of a known mineral resource and no impacts would occur.

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. The Project would not lead to the loss of availability of a locally significant mineral resource recovery site designated in a local GP, specific plan, or other land use plan. The Project site and SCE Valley Substation are situated near the Juniper Flat Pits, which are Open Pits primarily producing sand and gravel. Although the Project site falls under a regional SMARA Mineral Land Classification, there are no known mineral resources on the site itself. Nearby, an area designated as MRZ-1 is mostly developed with residential units and shows no signs of mining activity in aerial photography. The Project's execution would not involve mining activities, exhaust mineral deposits, or affect the availability of any established mineral resource recovery area or a mining zone. Therefore, the Project's implementation, including improvements to the SCE Valley Substation, would not cause any impacts on the accessibility of a recognized local mineral resource recovery site outlined in land use plans. As no impacts would occur, this environmental issue will not be further evaluated within the MND.

Mitigation Measures: No mitigation is required.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Sources: Menifee GP; Menifee GP Draft EIR; MCC; Menifee GP Draft EIR, Exhibit 5.12-3, "Airport Noise Contours"; FTA Transit Noise and Vibration Impact Assessment Manual.

Applicable General Plan Policies:

Goal N-1. Noise-sensitive land uses are protected from excessive noise and vibration exposure.

Policy N-1.1. Assess the compatibility of proposed land uses with the noise environment when preparing, revising, or reviewing development project applications.

Policy N-1.2. Require new projects to comply with the noise standards of local, regional, and state building code regulations, including but not limited to the City's Municipal Code, Title 24 of the California Code of Regulations, the California Green Building Code, and subdivision and development codes.

Policy N-1.3. Require noise abatement measures to enforce compliance with any applicable regulatory mechanisms, including building codes and subdivision and zoning regulations, and ensure that the recommended mitigation measures are implemented.

Policy N-1.7. Mitigate exterior and interior noises to the levels listed in the table below to the extent feasible, for stationary sources adjacent to sensitive receptors:

Table 12: Stationary Source Noise Standards

Land Use	Interior Standards	Exterior Standards
Residential 10:00 p.m. to 7:00 a.m. 7:00 a.m. to 10:00 p.m.	 40 L_{eq} (10 minute) 55 L_{eq} (10 minute)	 45 L_{eq} (10 minute) 65 L_{eq} (10 minute)

Policy N-1.8. Locate new development in areas where noise levels are appropriate for the proposed uses. Consider federal, state, and City noise standards and guidelines as a part of new development review.

Policy N-1.9. Limit the development of new noise-producing uses adjacent to noise-sensitive receptors and require that new noise-producing land be designed with adequate noise abatement measures.

Policy N-1.10. Guide noise-tolerant land uses into areas irrevocably committed to land uses that are noise-producing, such as transportation corridors adjacent to the I-215 or within the projected noise contours of any adjacent airports.

Policy N-1.11. Discourage the siting of noise-sensitive uses in areas in excess of 65 dBA CNEL without appropriate mitigation.

Policy N-1.12. Minimize potential noise impacts associated with the development of mixed-use projects (vertical or horizontal mixed-use) where residential units are located above or adjacent to noise-generating uses.

Policy N-1.13. Require new development to minimize vibration impacts to adjacent uses during demolition and construction.

Goal N-2. Minimal Noise Spillover. Minimal noise spillover from noise-generating uses, such as agriculture, commercial, and industrial uses into adjoining noise-sensitive uses.

Significance Analysis and Determination:

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?

Short-Term Construction

Less Than Significant Impact. In general, the City is most impacted by noise originating from motor vehicle traffic on highways and major arterial roadways. Portions of the City, and the Project site, are subject to higher noise levels associated with motor vehicle and railway traffic along I-215, SR-74, and the San Jacinto Branch of the Burlington Northern and Santa Fe (BNSF) Railway. Project construction, including SCE Valley Substation improvements, would result in temporary increases in ambient noise levels due to construction activities within the immediate vicinity of the Project site, however, pursuant to MMC Section 8.01.010, construction would be permitted only Monday through Saturday, except on nationally recognized holidays, from 6:30am to 7:00pm.

Construction noise is difficult to quantify because of the many variables involved including the size of equipment used, percentage of time and number of pieces of equipment which will actually operate on the site. However, based upon construction noise reference levels provided by the Federal Transit Administration (FTA 2018), maximum noise levels at 50 feet range from approximately 75 to 90 A-weighted decibels (dBA) for the type of equipment normally used in a project such as this. Typical operating cycles may involve two minutes of full power, followed by three or four minutes at lower levels. The nearest noise-sensitive receptors are residences located to the north of the Project site, on the north side of SR-74. The nearest noise-sensitive receptors are located over 1,000 feet from the Project site and approximately 1,800 feet from the center of the Project, where the noise would typically occur. Construction noise is attenuated by approximately six decibels for every doubling of distance. Thus, the maximum construction noise levels at the nearest residences would typically range from approximately 44 to 64 dBA during typical construction. Construction activities would comply with the City's allowable hours and days of operation. Additionally, the impacts related to construction would be short term and would not persist following the conclusion of construction and would not result in significant impacts.

Long-Term Operations

Less Than Significant Impact. On-site operational noise would consist of noise from inverters and the BESS cooling fans, as well as noise from the related battery string inverters and transformer. According to manufacturer specifications, noise originating from operation of inverters is 70 dBA at 3 meters. The battery enclosures are rated to attenuate noise to 65 dBA at 1.5 meters. The equipment, cumulatively, can produce noise levels that could be significant for cases in which noise-sensitive receivers are nearby. However, the nearest noise-sensitive land uses are located over 1,000 feet north of the Project boundary and approximately 1,800 feet from the Project's center, with nearby land uses consistency primarily of industrial uses. Based on the distance to noise receptors, electromechanical noise would attenuate to below the Menifee General Plan Policy N-1.7 standards of 65 dBA and 45 dBA for daytime and nighttime exterior noise levels. Further, there would be very few routine maintenance operations that would raise the ambient

noise levels in the vicinity of the Project that would result in long-term impacts. Off-site activities would be limited to transportation of employees to and from the Project site; such trips would be relatively few in number (estimated to be 24 vehicle trips per day, 5 days a week). The proposed SCE Valley Substation improvements would primarily involve modifications to existing equipment, which would not increase operational noise levels and would thus be less than significant. As such, long-term operational impacts of the Project, including improvements to the SCE Valley Substation, would be less than significant. No mitigation measures are required.

Decommissioning

The Project would likely have a lifespan of 30 years or more at which time the Project would be decommissioned. With regard to generation of substantial noise, decommissioning activities would be similar in nature to Project construction. Decommissioning activities would involve the deconstruction and removal of Project components from the site. Therefore, decommissioning would result in temporary increases in ambient noise levels within the immediate vicinity of the Project site, however, activities would comply with the MMC in effect at the time of decommissioning. As such, short-term decommissioning impacts would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact. During operation, no major sources of groundborne vibration (such as heavy rotating machinery or impact devices) are anticipated. During construction, there would be short-term increases in ground-borne vibration levels attributable to the Project, including improvements to the SCE Valley Substation. Groundborne vibration from construction activities is typically attenuated over short distances. The heavier pieces of construction equipment used at this site could include bulldozers, tractors, backhoes, excavators, loaded trucks, water trucks, rollers and pavers. Improvements at the SCE Valley Substation would primarily involve modifications to existing electrical equipment as well as installation of subsurface conduit, which would not require the use of equipment that would generate substation groundborne noise or vibration.

Based on published vibration data, the anticipated heavy construction equipment would generate a vibration level of approximately 0.089 inches per second (ips) peak particle velocity (PPV) at a distance of 25 feet from the source; lighter construction equipment, such as a small bulldozer, would generate a substantially lower vibration level of approximately 0.003 ips PPV at a distance of 25 feet from the source. Although heavy equipment would operate throughout the Project site at various construction phases, it is anticipated that heavy equipment would occasionally operate as close as approximately 1,000 feet from existing residences. At the distance from the nearest vibration-sensitive receivers (residences located to the north, on the north side of SR-74) to where construction activity would be occurring on the Project site, the PPV vibration level would be approximately 0.0004 ips. As such, vibration levels would be much less than the Caltrans threshold of 0.20 ips for human annoyance or the standard used by Caltrans for the prevention of structural damage to typical residential buildings of 0.3 ips PPV (Caltrans 2020). Because groundborne vibration from Project construction would not exceed recognized standards, and due to the temporary and intermittent occurrence of vibration levels, vibration impacts would be less than significant. No mitigation measures are required.

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?

No Impact. No private airstrips exist in the Project vicinity or SCE Valley Substation. The nearest airport is Perris Valley Airport, located approximately 3.5 miles northwest of the Project site. The Project site is not located within 2 miles of any public airport, nor is it located within the boundaries of any airport land use plans. Therefore, the proposed Project, including SCE Valley Substation improvements, would not expose or result in excessive noise for people residing or working in the Project area, and no impact would occur. No mitigation measures are required.

Mitigation Measures: No mitigation is required.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Sources: Menifee GP; Menifee GP Draft EIR; Southern California Association of Governments (SCAG) Adopted 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, Connect SoCal; and State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2021-2023. Sacramento, California, May 2023.

Significance Analysis and Determination:

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)?

Less Than Significant Impact. No land uses generating new homes or extension of roads and other infrastructure capable of inducing direct/indirect population growth in the City are proposed as part of the Project or SCE Valley Substation improvements. The Project proposes the development of a BESS facility that would potentially generate employment for both construction and operations activities. Construction personnel are expected to consist of 10 to 15 workers on average, depending on the construction activities. Construction is expected to last approximately 18 months and workers would most likely be hired from existing workforce within the Project region. The Project currently anticipates that there would be

approximately 8 to 12 staff to conduct operation and maintenance that would visit the Project site on a daily basis, Monday through Friday, to conduct routine inspection and maintenance of the facilities. The O&M staff would be housed at an off-site location centrally located to multiple AES facilities in the region. No O&M facilities would be constructed on site. Additionally, as previously discussed, the Project would be consistent with the City's GP Land Use Designation and zoning. Build out of the City's GP was analyzed within the City GP EIR and it was determined that implementation of the GP would not induce population growth exceeding the then existing GP projections. Further, the proposed SCE Valley Substation improvements would not increase the number of employees required for operation and maintenance of the existing substation site. As the Project, including SCE Valley Substation improvements, would not require a significant number of employees and would be consistent with the City GP, impacts would be less than significant regarding this topical area.

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

No Impact. The Project site is devoid of any housing units or other structures, eliminating the possibility of displacing people or housing. Consequently, there is no need for the construction of replacement housing elsewhere. The proposed SCE Valley Substation improvements would take place within the existing boundaries of the substation and would not result in any displacement of people or housing. Therefore, no impact would occur related to displacement of people or housing.

Mitigation Measures: No Mitigation is required.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☒	☐

Sources: Menifee GP; Menifee GP Draft EIR; Menifee Union School District and Perris Union High School District websites; Menifee Police Department; Riverside County Fire Department; SB 50; Government Code Section 65995(3)(h).

Applicable General Plan Policies:

Goal S-4. A community that has effective fire mitigation and response measures in place, and as a result is minimally impacted by wildland and structure fires.

Policy S-4.1. Require fire-resistant building construction materials, the use of vegetation control methods, and other construction and fire prevention features to reduce the hazard of wildland fire.

Policy S-4.2. Ensure, to the maximum extent possible, that fire services, such as firefighting equipment and personnel, infrastructure, and response times, are adequate for all sections of the City.

Policy S-4.4. Review development proposals for impacts to fire facilities and compatibility with fire areas or mitigate.

Policy S-4.5. Coordinate with CalFire to ensure that Fire Hazard Severity Zone mapping is up to date.

Policy S-4.9. Ensure all new development and/or redevelopment within the SRA will comply with all provisions of Title 14, CCR, Division 1.5, Chapter 7, Subchapter 3, Article 3 (commencing with § 1299.01) (Fire Hazard Reduction Around Buildings and Structures Regulations) for SRAs and VHFHSZs.

Policy S-4.11. When feasible, the City will minimize all new residential, commercial, and industrial development in the VHFHSZ.

Policy S-4.18. The City shall evaluate all redevelopment as well as new development after a large fire event to ensure development will comply with the most current version of the California Building Codes and California Fire Code. The City and Fire Department will continue to coordinate with State, regional, and local agencies on emergency management and on fire risk reduction planning.

Goal OSC-1. A comprehensive system of high-quality parks and recreation programs that meets the diverse needs of the community.

Policy OSC-1.7. Ensure that parks and recreational facilities are well-maintained by the responsible agency.

Significance Analysis and Determination:

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:***

Fire protection?

Less Than Significant Impact. The RVCFD provides fire protections and emergency medical response services for the City. RVCFD Station No. 7, is located at 28349 Bradley Road in Menifee California approximately 2.33 miles southwest of the Project site.

The Project, including SCE Valley Substation improvements, does not propose and would not create a need for new/physically altered fire protection facilities, thus, less than significant environmental impacts would occur in this regard. The Project would not have a significant impact on fire response times, as the Project is within RVCFD's existing service area. Further, the Project is subject to fire suppression development impact fees and other standards and conditions required by the City and County Fire and will be constructed to meet the latest CFC, 2021 IFC, NFPA 855 Standards for the Installation of Stationary Energy Storage Systems, UL 9540, and SB 38 requirements and has prepared an HMA (Appendix I) as required by the City.

The HMA concluded that the risk of thermal runaway and or chemical release due to battery failure is low with compliance with CFC 1207 and other applicable codes and standards. A detailed overview of the standards are included in the HMA and discussed in Section 3.9 of this document. Approval of the HMA by the Menifee Fire Department is required prior to Project approval. Upon approval of the HMA, the Menifee Fire Department will implement the necessary conditions of approval to ensure that any and all technologies used on-site will have proper accident procedures in place to reduce potential impacts from failures that could occur during normal operation of the Project. The Double Butte BESS project complies the fire code and industry standards for certification. All battery cells and modules proposed for Double Butte must undergo testing to ensure compliance with UL 9540A Standards demonstrate the hazards associated with battery energy storage fires can be addressed and to demonstrate the effectiveness of built-in fire prevention and suppression mechanisms. By locating battery cells in specially designed enclosures equipped with advanced safety and fire suppression systems, the battery technology to be used on the Double Butte project contains a layered series of protections designed to diminish the likelihood of any singular battery cell failure from cascading into a larger thermal runaway event or fire. Offering containment at the cell level, enclosure level, and system level, is key to managing thermal hazards in the unlikely event of a thermal occurrence. Technology included in the battery design which reduces fire risk includes:

- Battery Management Systems
- Emergency Shutdown
- Flammable Gas Detection
- Fire Detection and Alarm
- Direct Injection Fire Suppressant
- Exhaust Ventilation
- Deflagration Venting

The technology used in the Double Butte BESS project reduce the likelihood that any singular battery cell failure will cascade into a larger thermal runaway event or fire. The active and passive safety, monitoring and fire suppression systems, including flammable gas detection, fire detection and alarm, direct injection fire suppressant and exhaust/deflagration ventilation reduce the risk of thermal runaway and would avoid substantial numbers of calls for service to the site. As required by SB 38, AES will include an offer to train fire department staff on proper response to fire at BESS facilities when coordinating on preparation of the required emergency response plans. Additionally, SCE Valley Substation improvements would not increase the number of existing employees or otherwise place additional demands on RVCFD fire protection services. Therefore, Project impacts concerning fire protection services would be less than significant and no mitigation is required.

Police protection?

Less Than Significant Impact. Police protection services for the City and Project site would be provided by the MPD. MPD is a new department, authorized by City council to be created in late 2018 and officially opened to serve the public on July 1, 2020. The MPD operates out of its headquarters at 29714 Haun Road, Menifee, CA 92586 which is approximately 3.33 miles south of the Project site. As with fire protection services discussed above, the Project site is already within the service area of the MPD. MPD is comprised of two divisions: Operations and Investigations & Support Services. Within these divisions numerous units are used to serve the public. These include SWAT (in partnership with the cities of Murrieta and Hemet), K-

9, Traffic, Patrol, Crime Scene Investigators, Code Enforcement, Records, Investigations Unit, Problem Oriented Policing, and Court Ordered Registrants. The MPD would be provided the opportunity to review the Project's design to verify that all feasible crime prevention through environmental design (CPTED) strategies are incorporated. CPTED is a way of designing the built environment to create a safer built environment. CPTED elements include the strategic use of nighttime security lighting, avoidance of landscaping and fencing that limit sightlines, and use of a single, clearly identifiable point of entry. Therefore, impacts would be less than significant. Additionally, fees are required on new developments to pay for new facilities. Funding for the operation and maintenance of existing services comes from the City's General Fund, Measure DD funds, as well as County Service Area 86 monies. It is anticipated that the Project site would be adequately served by existing MPD facilities, equipment, and personnel such that new facilities would not be required. Because the Project site is not residential, although some calls for service are anticipated, the increase for police services would not be significantly impacted due to construction and operation of the BESS Facility. Additionally, the Project would not have a significant impact on police response times, because the Project site is within the Police's existing service area. SCE Valley Substation improvements would not increase the number of existing employees or otherwise place additional demands on MPD protection services. Therefore, Project impacts, including improvements to the SCE Valley Substation, concerning police protection services would be less than significant and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered police protection facilities; thus, less than significant environmental impacts would occur in this regard.

Schools?

Less Than Significant Impact. The Project site and SCE Valley Substation are within the jurisdiction of the Menifee Union School District and Perris Union High School District. The Project, including SCE Valley Substation improvements, would not nominally/incrementally increase demand for school facilities/services. However, the Project would be subject to payment of school impact fees in accordance with SB 50. Pursuant to Government Code Section 65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…" Therefore, Project impacts to schools would be less than significant and no mitigation is required. Additionally, the Project does not propose, and would not create a need for, new/physically altered school facilities; thus, less than environmental impacts would occur in this regard.

Parks?

No Impact. The Project, including SCE Valley Substation improvements, would not significantly bring new residents to the general area and the use of parks and other facilities has been accounted for in the GP. The proposed Project would not significantly increase the demand of such services and a less than significant impact would occur.

Other public facilities?

Less Than Significant Impact. The Project, including SCE Valley Substation improvements, would not significantly bring new residents to the general area and the use of other facilities has been accounted for in the GP. The proposed Project would not significantly increase the demand of such services and a less than significant impact would occur.

Mitigation Measures: No mitigation is required.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Sources: Menifee GP; Menifee GP Draft EIR; MMC.

Applicable General Plan Policies:

Goal OSC-1. A comprehensive system of high-quality parks and recreation programs that meets the diverse needs of the community.

Policy OSC-1.1. Provide parks and recreational programs to meet the varied needs of community residents, including children, youth, adults, seniors, and persons with disabilities, and make these facilities and services easily accessible and affordable to all users.

Policy OSC-1.2. Require a minimum of five acres of public open space to be provided for every 1,000 City residents.

Policy OCS-1.7. Ensure that parks and recreational facilities are well-maintained by the responsible agency.

Significance Analysis and Determination:

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, including SCE Valley Substation improvements, would not increase the use of existing neighborhood and regional parks or other recreational facilities to the extent that substantial physical deterioration of these facilities would occur or be accelerated. The information indicates that the Project's generated population would not result in such deterioration according to the MMC. Additionally, Section 7.75.090 of the MMC specifies that commercial and industrial subdivisions are exempt from the provisions of MMC Chapter 7.75: Parkland Dedication and Fees. Therefore, the exemption further ensures

that the Project, including SCE Valley Substation improvements, would not lead to the specified adverse impacts on existing recreational facilities.

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, including SCE Valley Substation improvements, does not include recreational facilities that would have an adverse physical effect on the environment. The information specifies that the City's requirements for dedication of land or payment of fees for park and recreation facilities are outlined in the MMC. The City's regulations ensure that such dedication or fee payments are made as a condition of approval for a tentative or parcel map. Moreover, Section 7.75.090 of the MMC explicitly states that commercial and industrial subdivisions are exempt from the provisions of MMC Chapter 7.75: Parkland Dedication and Fees. Consequently, no adverse impact would occur due to the Project, including SCE Valley Substation improvements, and no mitigation would be required as per the MMC's provisions and exemptions.

Mitigation Measures: No mitigation is required.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Sources: Menifee GP; Menifee GP Draft EIR; Senate Bill 743; Menifee GP, Exhibit C-5, Potential Transit Services; Menifee GP, Exhibit C-4, Proposed Bikeway and Community Pedestrian Network; City of Menifee Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT); Transportation Assessment Memo (Dudek, October 2023) provided in Appendix J.

Applicable General Plan Policies:

Goal C-1. A roadway network that meets the circulation needs of all residents, employees, and visitors to the City of Menifee.

Policy C-1.1. Require roadways to:

- Comply with federal, state, and local design and safety standards.

- Meet the needs of multiple transportation modes and users.
- Be compatible with the streetscape and surrounding land uses.
- Be maintained in accordance with best practices.

Policy C-1.2. Require development to mitigate its traffic impacts and achieve a peak hour Level of Service (LOS) D or better at intersections, except at constrained intersections at close proximity to the I-215 where LOS E may be permitted.

Policy C-1.5. Minimize idling times and vehicle miles traveled to conserve resources, protect air quality, and limit greenhouse gas emissions.

Goal C-2. A bikeway and community pedestrian network that facilitates and encourages nonmotorized travel throughout the City of Menifee.

Policy C-2.1. Require on- and off-street pathways to:

- Comply with federal, state and local design and safety standards.
- Meet the needs of multiple types of users (families, commuters, recreational beginners, exercise experts) and meet ADA standards and guidelines.
- Be compatible with the streetscape and surrounding land uses.
- Be maintained in accordance with best practices.

Policy C-2.2. Provide off-street multipurpose trails and on-street bike lanes as our primary paths of citywide travel and explore the shared use of low-speed roadways for connectivity wherever it is safe to do so.

Policy C-2.3. Require walkways that promote safe and convenient travel between residential areas, businesses, schools, parks, recreation areas, transit facilities, and other key destination points.

Policy C-2.4. Explore opportunities to expand the pedestrian and bicycle networks; this includes consideration of utility easements, drainage corridors, road rights-of-way and other potential options.

Goal C-3. A public transit system that is a viable alternative to automobile travel and meets basic transportation needs of the transit dependent.

Policy C-3.1. Maintain a proactive working partnership with transit providers to ensure that adequate public transit service is available.

Policy C-3.2. Require new development to provide transit facilities, such as bus shelters, transit bays, and turnouts, as necessary.

Policy C-3.3. Provide additional development-related incentives to projects that promote transit use.

Significance Analysis and Determination:

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

No Impact. The Project and SCE Valley Substation are well-aligned with the existing circulation system, including transit, roadway, bicycle, and pedestrian facilities in the area. The Project utilizes major roadways, such as Interstate 215 and local roads, as primary access points. Additionally, it has provisions to improve Palomar Road, San Jacinto Road and McLaughlin Road. AES would construct the western half of Palomar Road as measured from the roadway centerline to the standards of a "Collector Road" between McLaughlin Road and Case/Matthews Road and the eastern half of San Jacinto Road between McLaughlin Road and a cul de sac at the northwest corner of the Project site in coordination with the adjacent property owner (Calpine Corporation). San Jacinto Road would be constructed to include one undivided 12-foot travel lane; 10-foot landscape parkway; and curb and gutter within a 60-foot ROW. A segment of McLaughlin Road would be constructed to a "Rural Road" standard between San Jacinto Road and Antelope Road. Further, improvements to the SCE Valley Substation would take place within the existing boundaries of the substation and would not require any land closures during construction or generate any additional employees or otherwise increase operation traffic flows. Therefore, there are no impacts related to conflicting programs, plans, ordinances, or policies addressing the circulation system.

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

No Impact. The City of Menifee recently adopted new Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) (June 2020) (City Guidelines), which documents the City's VMT analysis methodology and approved impact thresholds. The VMT analysis presented below has been developed based on the newly adopted City Guidelines, a detailed transportation assessment memo is included in Appendix J. The analysis utilized the Western Riverside Council of Governments (WRCOG) VMT Screening Tool (Screening Tool). The Screening Tool allows users to input an APN to determine if a project's location meets one or more of the screening thresholds for land use projects identified in the City Guidelines.

Project Screening

The Technical Advisory and City Guidelines describe specific "screening thresholds" that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed project level VMT analysis. Screening thresholds are described in the following three steps:

- Transit Priority Area (TPA) Screening
- Low VMT Area Screening
- Project Type Screening

Consistent with the Technical Advisory and City Guidelines, a land use project needs only to satisfy one of the above screening thresholds to result in a less than significant impact.

TPA Screening

Projects located within a TPA (i.e., within 0.5 miles of an existing "major transit stop" or an existing stop along a "high-quality transit corridor") may be presumed to have a less than significant impact absent substantial evidence to the contrary.

However, the presumption may NOT be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Low VMT Area Screening

The City Guidelines also states that, "residential and office projects located within a low VMT-generating area are presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if there is a reasonable expectation that the project will generate VMT per service population that is similar to the existing land uses in the low VMT area."

Project Type Screening Threshold

The City Guidelines notes projects that generate less than 110 daily vehicle trips would cause a less than significant impact. As previously stated, the Project is anticipated to generate 6,240 vehicle trips per year (equivalent to 17 average daily trips) and is within the 110 daily vehicle trip thresholds. As such, the Project would be screened from VMT analysis due to the Project type screening threshold.

The Project aligns with the City of Menifee's recently adopted Traffic Impact Analysis Guidelines for VMT and the associated screening thresholds. These guidelines and thresholds help identify when a land use project is likely to result in a less than significant VMT impact without requiring an in-depth VMT analysis. The analysis for the Project utilized these guidelines, specifically the WRCOG VMT Screening Tool, which allows for a preliminary assessment of a project's VMT impact based on its location.

The VMT analysis was conducted based on the newly adopted City Guidelines, and it followed the established screening thresholds, including TPA Screening, Low VMT Area Screening, and Project Type Screening.

The TPA Screening determined that the Project site is not within half a mile of an existing major transit stop or along a high-quality transit corridor. Consequently, the TPA screening threshold is not met for this Project.

The Low VMT Area Screening also did not apply to the Project, as it was not located within a low VMT-generating area. Therefore, it did not meet the Low VMT Area screening threshold.

However, the Project Type Screening Threshold was met, as the Project is anticipated to generate approximately 17 daily vehicle trips (or less), which is well below the threshold of 110 daily vehicle trips. This indicated that the Project would be exempt from a detailed VMT analysis due to meeting the Project Type screening threshold.

While worker and vendor trips would generate VMT, once construction is completed, the construction-related traffic would cease and VMT would return to pre-construction conditions. Therefore, impacts related to construction VMT would also be less than significant.

Conclusion

Based on the review of the VMT screening thresholds, the Project, including SCE Valley Substation improvements, aligns with the Project Type Screening Threshold and would be presumed to result in a less than significant VMT impact. While it did not meet the TPA or Low VMT Area screening thresholds, meeting the Project Type screening is sufficient to establish a less than significant VMT impact, eliminating the need for additional VMT analysis. Therefore, impacts related to VMT are less than significant. No mitigation measures are required.

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)?

No Impact. The Project's transportation infrastructure does not introduce any hazardous geometric design features or incompatible uses. It utilizes existing roadways and includes provisions for road improvements, ensuring safety. As discussed previously, road improvements will be constructed to City standards. Additionally, improvements to the SCE Valley Substation would take place within the existing boundaries of the substation and would not require any lane closures or otherwise impede any public ROW. Therefore, there are no impacts related to hazards due to geometric design features or incompatible uses.

d) Would the project result in inadequate emergency access?

No Impact. The Project has considered emergency access with the inclusion of a primary access location via a new driveway on Palomar Road and a secondary emergency access location via a new driveway along San Jacinto Road along the western site boundary. This provision ensures adequate emergency access to the Project site. A segment of McLaughlin Road would be constructed to a "Rural Road" standard between San Jacinto Road and Antelope Road. Additionally, SCE Valley Substation improvements would be entirely within the existing substation footprint and would not impede any public ROW, therefore no impacts would occur with regard to emergency access as a result of the SCE Valley Substation improvements. Therefore, the Project is not expected to result in inadequate emergency access.

Mitigation Measures: No mitigation is required.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. 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:				
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.	☐	☐	☒	☐

Sources: Menifee GP; Menifee GP Draft EIR; PRC.

Applicable General Plan Policies:

Goal OSC-5. Archaeological, historical, and cultural resources that are protected and integrated into the City's built environment.

Policy OSC-5.1. Preserve and protect archaeological and historic resources and cultural sites, places, districts, structures, landforms, objects and native burial sites, traditional cultural landscapes and other features, consistent with state law and any laws, regulations or policies which may be adopted by the city to implement this goal and associated policies.

Policy OSC-5.4. Establish clear and responsible policies and best practices to identify, evaluate, and protect previously unknown archaeological, historic, and cultural resources, following applicable CEQA and NEPA procedures and in consultation with the appropriate Native American tribes who have ancestral lands within the city.

Policy OSC-5.5. Develop clear policies regarding the preservation and avoidance of cultural resources located within the city, in consultation with the appropriate Native American tribes who have ancestral lands within the city.

Policy OSC-5.6: Develop strong government-to-government relationships and consultation protocols with the appropriate native American tribes with ancestral territories within the city in order to ensure better identification, protection and preservation of cultural resources, while also developing appropriate educational programs, with tribal participation, for Menifee residents.

Significance Analysis and Determination:

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) 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)?

Less than Significant Impact. AB 52 specifies that a project that may cause a substantial adverse change to a defined TCR may result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, MND, or EIR is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB 52 identifies examples of mitigation measures that will avoid or minimize impacts to a TCR. The bill makes these provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/MND circulated on or after July 1, 2015.

Based on the City's prior experience with and written requests from potentially interested Tribes, AB 52 Notices were sent to the following four Tribes:

- Agua Caliente Band of Cahuilla Indians;
- Pechanga Band of Luiseño Indians;
- Rincon Band of Luiseño Indians; and
- Soboba Band of Luiseño Indians.

During a quarterly meeting between the City and the Soboba Band of Luiseño Indians on January 24, 2024, the Soboba Band of Luiseño Indians requested to participate in the preparation of the Phase 1 Cultural Resources Report. Tribal monitoring by the Soboba Band of Luiseño Indians was conducted during the pedestrian survey of the Project site and the laydown yard parcel conducted on December 18, 2023, and concluded no TCRs were identified. The Soboba Band of Luiseño Indians indicated that the City's standard conditions of approval were sufficient to address any potential impacts related to TCRs related to the implementation of the Project. On January 27, 2023, the Agua Caliente Band of Cahuilla Indians requested to review the cultural report, no formal request for consultation pursuant to AB 52 has been made. On January 26, 2023, Rincon Band of Luiseño Indians deferred consultation to Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians. Pechanga Band of Luiseño Indians requested formal consultation and to participate in archeological pedestrian field surveys of the Project site. Pechanga Band of Luiseño Indians reviewed and provided comments on the Draft Cultural Resources Assessment.

Based on consultation with local tribes, Standard Conditions of Approval COA-CUL-1 through COA-CUL-8 would ensure that any impacts to potential tribal cultural resources would be less than significant.

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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less than Significant Impact. See Response 3.18 (a) above.

Standard Conditions of Approval:

COA-CUL-1 Human Remains.

If human remains are encountered, State Health and Safety Code § 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource Code § 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the "most likely descendant." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in PRC § 5097.98.

COA-CUL-2 Non-Disclosure of Location Reburials.

It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The coroner, pursuant to the specific exemption set forth in California Government Code 6254 (r)., parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).

COA-CUL-3 Inadvertent Archeological Find.

If during ground disturbance activities, unique cultural resources are discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, the following procedures shall be followed. Unique cultural resources are defined, for this condition only, as being multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Native American Tribe(s).

g) All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the archaeologist, the tribal representative(s) and the Community Development Director to discuss the significance of the find.

h) At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representative(s) and the archaeologist, a decision shall be made, with the

concurrence of the Community Development Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

i) Grading or further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal monitors, if needed.

j) Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through Project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property, so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition.

k) If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.

l) Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the City Community Development Director for decision. The City Community Development Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the Project archeologist and shall take into account the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the City Community Development Director shall be appealable to the City Planning Commission and/or City Council.

COA-CUL-4 Cultural Resources Disposition.

In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:

b) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Menifee Community Development Department:

i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.

ii. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the

reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request.

iii. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the City. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report.

COA-CUL-5 Archeologist Retained.

Prior to issuance of a grading permit the Project applicant shall retain a Riverside County qualified archaeologist to monitor all ground disturbing activities in an effort to identify any unknown archaeological resources.

The Project Archaeologist and the Tribal monitor(s) shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the Project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition and etc. The Project Archaeologist and the Tribal monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with any required special interest or tribal monitors.

The developer/permit holder shall submit a fully executed copy of the contract to the Community Development Department to ensure compliance with this condition of approval. Upon verification, the Community Development Department shall clear this condition.

In addition, the Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a Cultural Resources Management Plan in consultation pursuant to the definition in AB 52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the Project site. A consulting tribe is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB 52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code § 21080.3.2(b)(1) of AB 52. Details in the Plan shall include:

D. Project grading and development scheduling;
E. The Project archeologist and the Consulting Tribes(s) shall attend the pre-grading meeting with the City, the construction manager and any contractors, and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the

requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the Project following the initial Training must take the Cultural Sensitivity Training prior to beginning work and the Project archaeologist and Consulting Tribe(s) shall make themselves available to provide the training on an as-needed basis;

F. The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

COA-CUL-6 Native American Monitoring (Pechanga).

Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Pechanga Band of Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the Project to the Community Development Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.

COA-CUL-7 Native American Monitoring (Soboba).

Tribal monitor(s) shall be required on-site during all ground-disturbing activities, including grading, stockpiling of materials, engineered fill, rock crushing, etc. The land divider/permit holder shall retain a qualified tribal monitor(s) from the Soboba Band of Luiseno Indians. Prior to issuance of a grading permit, the developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land divider/permit holder for the monitoring of the Project to the Community Development Department and to the Engineering Department. The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbance activities to allow recovery of cultural resources, in coordination with the Project Archaeologist.

COA-CUL-8 Prior to Final Occupancy

Archeology Report - Phase III and IV. Prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).

Mitigation Measures: No mitigation is required.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, waste water 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 waste water 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) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Sources: Menifee GP; Menifee GP Draft EIR; Metropolitan Water District of Southern California (MWD); Waste Management, Inc.; EMWD 2020 UWMP.

Applicable General Plan Policies:

Goal LU-3. A full range of public utilities and related services that provide for the immediate and long-term needs of the community.

Policy LU-3.1. Work with utility providers in the planning, designing, and siting of distribution and support facilities to comply with the standards of the General Plan and Development Code.

Policy LU-3.2. Work with utility providers to increase service capacity as demand increases.

Policy LU-3.3. Coordinate public infrastructure improvements through the City's Capital Improvement Program.

Policy LU-3.4. Require that approval of new development be contingent upon the project's ability to secure appropriate infrastructure services.

Policy LU-3.5. Facilitate the shared use of right-of-way, transmission corridors, and other appropriate measures to minimize the visual impact of utilities infrastructure throughout Menifee.

Goal OSC-7. A reliable and safe water supply that effectively meets current and future user demands.

Policy OSC-7.2. Encourage water conservation as a means of preserving water resources.

Policy OSC-7.4. Encourage the use of reclaimed water for the irrigation of parks, golf courses, public landscaped areas, and other feasible applications as service becomes available from the Eastern Municipal Water District.

Policy OSC-7.5. Utilize a wastewater collection, treatment, and disposal system that adequately serves the existing and long-term needs of the community.

Policy OSC-7.7. Maintain and improve existing level of sewer service by improving infrastructure and repairing existing deficiencies.

Significance Analysis and Determination:

a) Would the project require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The Project's operation does not require the construction or relocation of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities that would cause significant environmental effects. SCE will provide electrical services, water needed for landscape irrigation will be provided by water distribution currently located at the site, handwashing stations and portable toilets will be provided as required under the CCR Title 8, Section 8397.4 2 Health and Sanitation, subsection (d)(2)(A) and table F-2 during construction and operation, indicating no significant impact in this regard.

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, including improvements to the SCE Valley Substation, is not anticipated to face water supply shortages during normal, dry, or extended dry periods. A new water connection would be installed for fire protection as well as minimal landscaping irrigation. Operational water for the Project would be limited to these uses. Since Project operation does not rely on water or sewer services, it is unlikely to have a significant impact on water availability or resources in the area.

c) Would the project result in a determination by the waste water 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?

Less Than Significant Impact. The Project's operation, including the SCE Valley Substation, does not require wastewater treatment services, and therefore, it would not result in a determination by the wastewater treatment provider that it lacks adequate capacity to serve the Project's projected demand. Therefore, this aspect of the Project poses a less than significant impact regarding waste-water treatment.

d) Would the project 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?

Less Than Significant Impact. The Project, including improvements to the SCE Valley Substation, is not expected to generate solid waste in excess of state or local standards, nor is it expected to exceed the capacity of local infrastructure. Additionally, there is no indication that the Project would impair the attainment of solid waste reduction goals. As a result, it is not anticipated to have a significant impact in terms of solid-waste generation and management.

e) 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, including improvements to the SCE Valley Substation, is required to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. As such, it is expected to be in compliance with these regulations, and there is no indication that it would result in a significant impact in this regard.

Mitigation Measures: No mitigation is required.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Sources: Menifee GP; Menifee GP Draft EIR; Menifee GP, Exhibit S-3 Liquefaction and Landslides Map, Exhibit S-6, High Fire Hazard Areas, Exhibit S-7, Critical Facilities; CAL FIRE Very High Fire Hazard Severity Zone (VHFHSZ) or Fire Hazard Severity Zone (FHSZ) Viewer.

Applicable General Plan Policies:

Goal S-4. A community that has effective fire mitigation and response measures in place, and as a result is minimally impacted by wildland and structure fires.

Policy S-4.1. Require fire-resistant building construction materials, the use of vegetation control methods, and other construction and fire prevention features to reduce the hazard of wildland fire.

Policy S-4.2. Ensure, to the maximum extent possible, that fire services, such as firefighting equipment and personnel, infrastructure, and response times, are adequate for all sections of the City. The City will continue to coordinate with the Riverside County Fire Department, for Interagency coordination, to respond to emergency calls in Menifee and to provide training and ongoing programs for public education.

Policy S-4.4. Review development proposals for impacts to fire facilities and compatibility with fire areas or mitigate.

Policy S-4.5. Coordinate with CalFire to ensure that Fire Hazard Severity Zone mapping is up to date.

Policy S-4.6. Coordinate with Eastern Municipal Water District to ensure adequate water availability for fire suppression.

Policy S-4.9. Ensure all new development and/or redevelopment within the SRA will comply with all provisions of Title 14, CCR, division 1.5, chapter 7, subchapter 3, article 3 (commencing with § 1299.01) (Fire Hazard Reduction Around Buildings and Structures Regulations) for SRA's and VHFHSZs.

Policy S-4.11. When feasible, the City will minimize all new residential, commercial, and industrial development in the VHFHSZ.

Policy S-4.17. The City should ensure that all new development has adequate water, sewer, and fire protection consistent with the most current California Building Code and California Fire Code and will comply with the Board of Forestry and Fire Protection Fire Safe Regulations.

Policy S-4.18. The City shall evaluate all redevelopment as well as new development after a large fire event to ensure development will comply with the most current version of the California Building Codes and California Fire Code. The City and Fire Department will continue to coordinate with State, regional, and local agencies on emergency management and on fire risk reduction planning.

Goal S-5. A community that has reduced the potential for hazardous materials contamination.

Policy S-5.1. Locate facilities involved in the production, use, storage, transport, or disposal of hazardous materials away from land uses that may be adversely impacted by such activities and areas susceptible to impacts or damage from a natural disaster.

Policy S-5.2. Ensure that the fire department can continue to respond safely and effectively to a hazardous materials incident in the City, whether it is a spill at a permitted facility, or the result of an accident along a section of the freeway or railroads that extend across the City.

Policy S-5.4. Ensure that all facilities that handle hazardous materials comply with federal and state laws pertaining to the management of hazardous wastes and materials.

Policy S-5.5. Require facilities that handle hazardous materials to implement mitigation measures that reduce the risks associated with hazardous material production, storage, and disposal.

Policy S-5.6. Require all new industrial development projects and significant rehabilitation or expansion projects to reduce industrial truck idling by enforcing California's five (5) minute maximum law, requiring warehouse and distribution facilities to provide adequate on-site truck parking, and requiring refrigerated warehouses to provide generators for refrigerated trucks. Require air pollution point sources to be located at safe distances from sensitive sites such as homes and schools.

Goal S-6. A City that responds and recovers in an effective and timely manner from natural disasters such as flooding, fire, and earthquakes, and as a result is not impacted by civil unrest that may occur following a natural disaster.

Policy S-6.1. Continuously review, update, and implement emergency preparedness, response, and recovery plans that make the best use of the City- and county-specific emergency management resources available.

Significance Analysis and Determination:

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

Less Than Significant Impact. The Project site and SCE Valley Substation are not situated within an area categorized as Moderate, High, or Very High FHSZ based on the delineations established by the CAL FIRE. Adherence to regulations governing emergency access, water supply, a defensible space, in accordance

with the Consolidated Fire Code would be obligatory for the Project. It is important to highlight that the Project's function as a BESS facility effectively reduces the potential exposure of individuals or buildings to significant hazards. Nevertheless, due to the notably elevated density of ignition sources on-site, a dedicated Fire Protection Plan specific to the Project will be devised. This plan will assess potential risk pertaining to losses, injuries, or fatalities resulting from wildland fire during both Project operation and construction. While the Project's progression isn't projected to augment the demand for fire protection or emergency services on account of heightened activities, the increased presence of ignition sources necessitates careful consideration. A comprehensive analysis regarding the Project's potential to substantially hinder an established emergency response or evacuation plan will be comprehensively conducted. Following compliance with the established local and state regulatory framework, the Project, including improvements to the SCE Valley Substation, would not expose people or structures to a significant risk involving wildland fires and impacts would be less than significant in this regard.

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

Less Than Significant Impact with Mitigation. The Project site and SCE Valley Substation are not located within a Moderate, High, or Very High FHSZs. Further the Project site does not contain areas of steep slope or other factors that would exacerbate the risk of wildfire. During operation of the Project, there would be the potential for hazards and accidents typical with that of other BESS operations. These hazards and potential accidents, while infrequent and minimized through routine maintenance and inspection, include, but are not limited to fires, explosions, and the release of toxic gases. The primary potential upset and accident condition for the Project would be the risk of a thermal runaway event occurring, where the system increases in temperature, in turn releasing energy that further increases temperature. This could potentially cause a fire due to the overheating of the battery system. A fire may release toxic chemicals into the air and atmosphere. Alternately, a wildfire beginning offsite could potentially spread on-site causing an ignition of the battery system.

However, under normal operations, a BESS does not store or generate hazardous materials in quantities that would represent a risk to Project occupants. The BESS would be monitored via a SCADA system to allow the instantaneous shut-down of the system in the case of a thermal runaway or other fire producing event. Further, the Project would be required to comply the City MMC and fire code and with all local, state, and federal requirements related to Project design, operations, fire suppression and accident responses. The Project would incorporate a fire suppression system and would be subject to design requirements in accordance with the NFPA, OSHA, the CFC, and California Environmental Protection Agency requirements. In addition to complying with these requirements, the Project has prepared a hazard mitigation analysis (Appendix I) which will ensure that any and all technologies used on site will have proper accident procedures in place to mitigate any potential impacts from pollutant releases that could occur as a result of wildfire.

With adherence to the existing, applicable General Plan policies listed above and regulatory requirements, the proposed Project, including SCE Valley Substation improvements, would not involve conditions that would exacerbate the potential of wildfire or create a significant risk to expose Project occupants to pollutant concentrations from a wildfire, or the uncontrollable spread of wildfire; Therefore, impacts would be less than significant.

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?

Less Than Significant Impact. The Project includes standard infrastructure, including roadways, utilities, and fire suppression systems. All of this infrastructure is designed to reduce the risk of fire. Following compliance with the established local and state regulatory framework discussed above, the Project, including SCE Valley Substation improvements, would not expose people or structures to a significant risk involving wildland fires and impacts would be less than significant in this regard.

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. The Project site and SCE Valley Substation are relatively flat and are not located in a landslide prone zone according to the Exhibit S-3 of the Menifee GP and are located within an area with a slope of 0-19 degrees according to Exhibit S-2 of the Menifee GP. Grading proposed for the Project is not expected to create substantially alter the elevations or slope of the site. Additionally, the SCE Valley Substation improvements would take place within the existing substation footprint and would contribute to increased surface runoff, post-fire slope instability, or drainage changes. Following site grading the Project site would not include major slopes or other features that may become unstable as a result of fire. Changes to the drainage patterns of the site are anticipated to reduce sheet flows and retain stormwater on site, as to not increase Project site characteristics that would expose people or structures to downstream flooding. As such, the potential for slope failure and landslides in the event of a fire would be negligible. Therefore, risks associated with slope are considered "low" and impacts would be less than significant in this regard.

Mitigation Measure: No mitigation is required

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐

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 with Mitigation. As discussed throughout the analyses contained in this IS, the Project does not have the potential to degrade the quality of the environment or result in significant impacts to the environment that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., local, state, and federal regulations), Project conditions of approval, and the recommended mitigation measures.

As concluded in Section IV, the Project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal following compliance with the recommended mitigation measures. As concluded in Section V, the Project would not eliminate important examples of the major periods of California history or prehistory.

The City hereby finds that impacts concerning degradation of the environment and biological and cultural resources would be less than significant with mitigation measures and COAs incorporated

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 The proposed Project would result in significant impacts unless mitigated for the following environmental issues: air quality, biological resources. A Mitigation Program has been prepared for these environmental issue areas to reduce impacts to less than significant.

City standard conditions of approval would also be imposed upon the Project, as appropriate. Other development projects within the City would also be subject to these requirements, as appropriate.

All other Project impacts were determined either to have no impact or to be less than significant following compliance with the established regulatory framework, without the need for mitigation. Cumulatively, the proposed Project would not result in any significant impacts that would substantially combine with impacts of other current or probable future impacts. Therefore, the Project, in conjunction with other future projects, would not result in any cumulatively considerable impacts and no mitigation is required.

Therefore, the City hereby finds that the Project's contribution to cumulative impacts would be less than significant with mitigation incorporated.

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

Less Than Significant Impact with Mitigation. Based on the analysis of the Project's impacts in the responses to items 3.1 through 3.20 above, there is no indication that the Project would result in substantial adverse effects on human beings. While there would be temporary construction-related effects related to air quality emissions, and long-term operational impacts related to hazardous materials, these would be reduced to less than significant with the implementation of mitigation. The analysis herein concludes that direct and indirect environmental effects would be less than significant with the incorporation of mitigation measure **MM-AQ-1**. Based on the analysis in this IS/MND, the City finds that direct and indirect impacts to human beings would be less than significant with mitigation incorporated.

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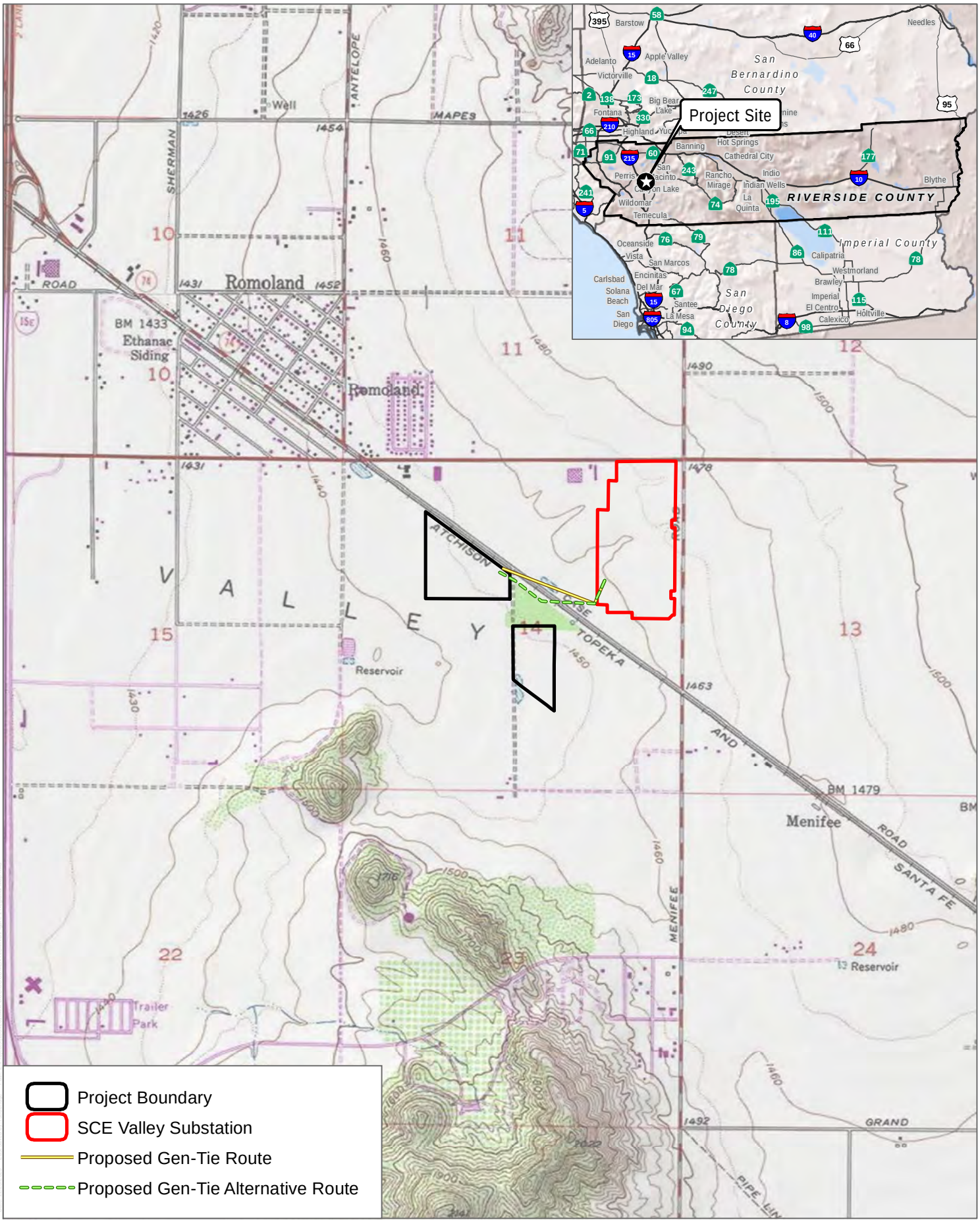
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SOURCE: USGS 7.5-minute Series Romoland Quadrangle

DUDEK

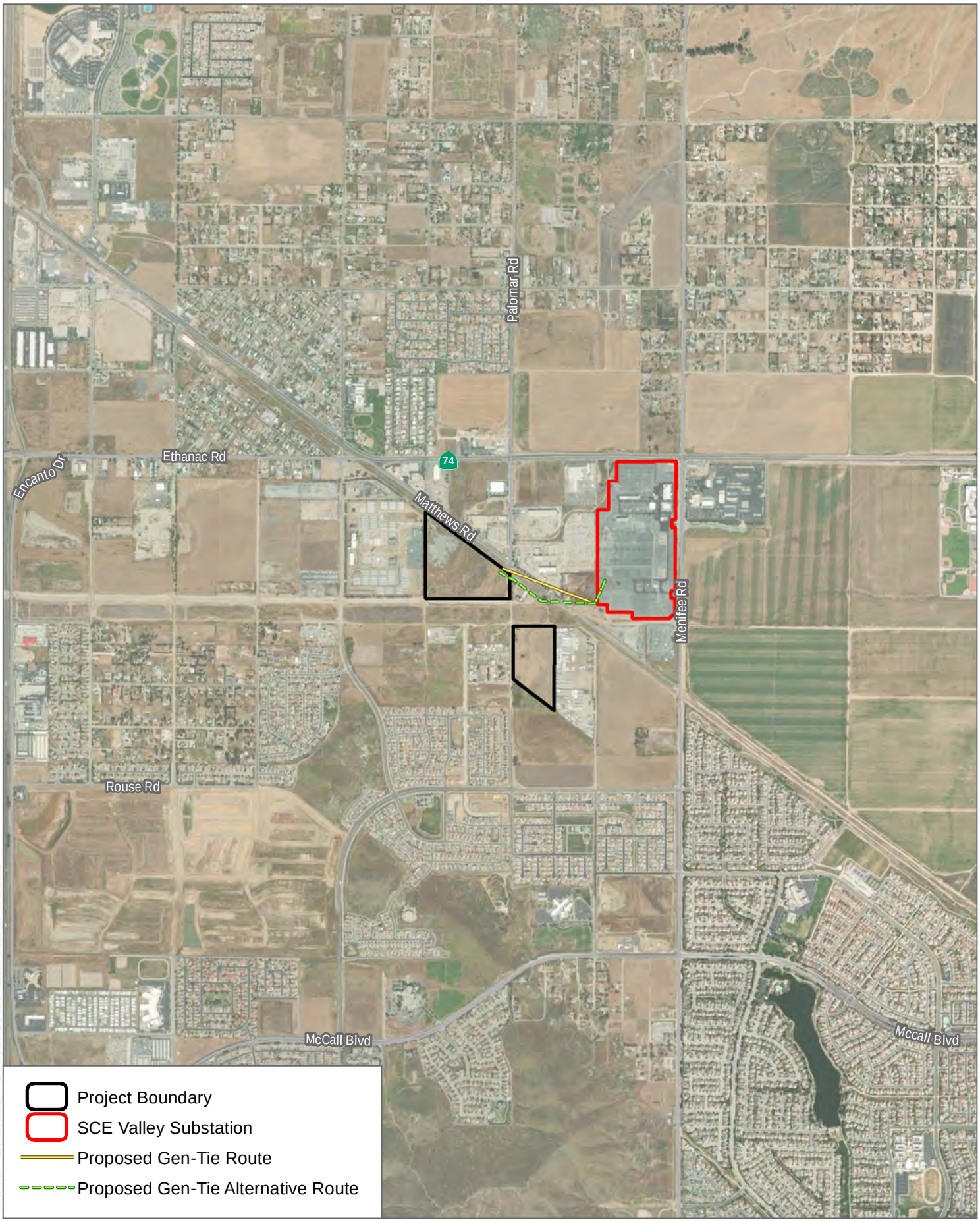
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FIGURE 1

Regional Map

Double Butte Battery Storage Project

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SOURCE: Bing Maps 2023

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FIGURE 2

Site Location

Double Butte Battery Storage Project

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SOURCE: Bing Maps 2023

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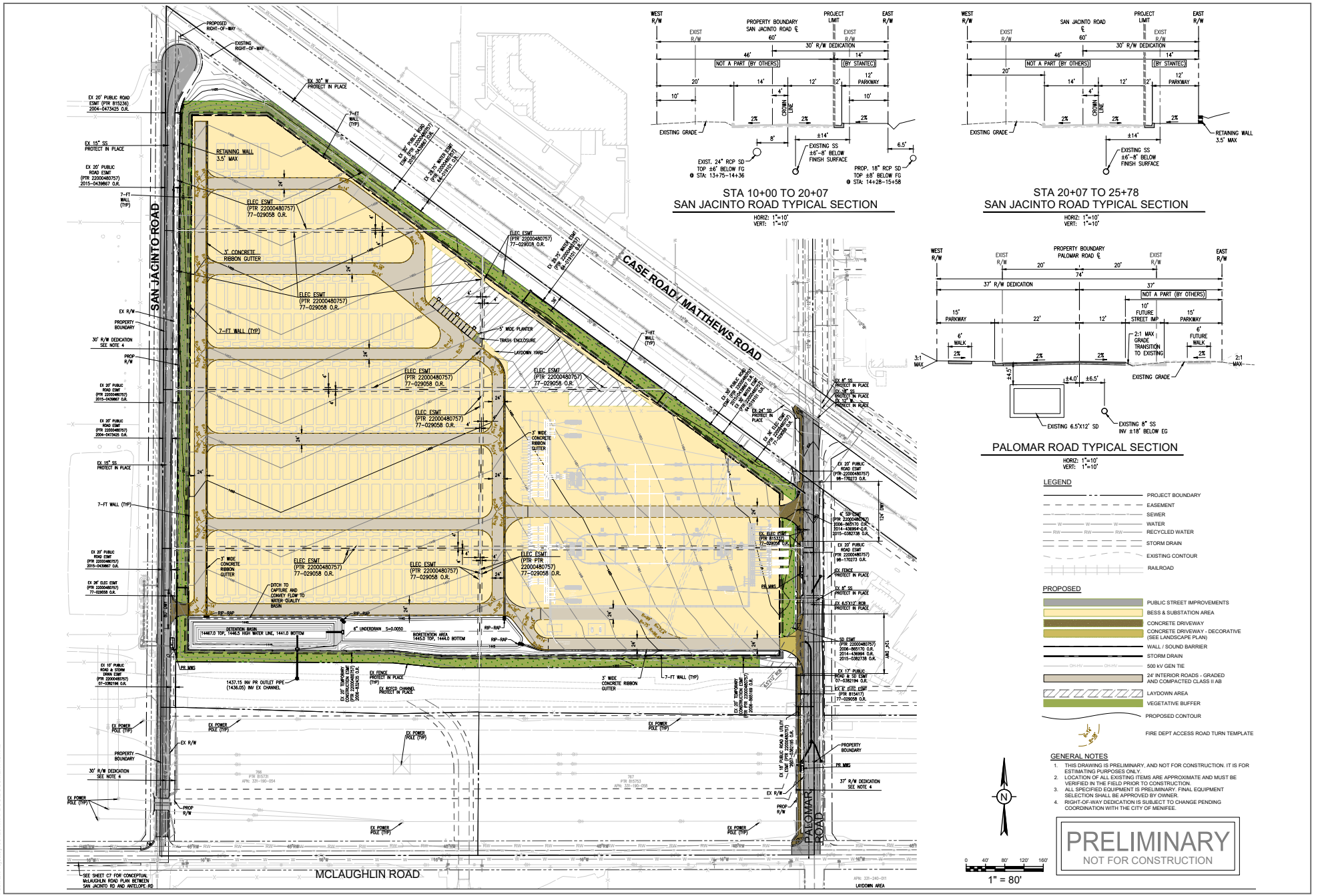
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FIGURE 3

Aerial Overview

Double Butte Battery Storage Project

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SOURCE: AES, 2025

FIGURE 4

Conceptual Site Plan

Double Butte Battery Storage Project

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SITE/POWER LEGEND

	BATTERY SEGMENT
	EQUIPMENT PAD
	24' INTERIOR ROADS - GRADED AND COMPACTED CLASS II AB
	ON-SITE YARD LIGHTS
	PARKING

FICUS, GELSEMIUM AND JUNIPERUS ARE IN THE 'MODERATE WATER USE' HYDROZONE AND ALL OTHER PROPOSED PLANTS ARE IN THE 'LOW WATER USE' HYDROZONE

LINEAR ROOT BARRIER SPECIFIED. DO NOT USE PLASTIC BOX BARRIERS.

REFERENCE NOTES SCHEDULE

CODE	DESCRIPTION	QTY
Planting		
P-101	LANDSCAPE BOULDERS 3' WIDE BY 24-30" TALL (MAX 30" TALL)	17
P-102	FREESTANDING STEEL TRELLIS. COLOR: BLACK	2
P-103	2"-4" DIA COBBLE, 6" DEEP, OVER MW700 MIRIFI FABRIC. COLOR: BUFF MULTICOLORED SANTA FE OR MISSION COBBLE FROM SOUTHWEST BOULDER OR EQUAL	1,904 SF
P-104	STEEL EDGING. COLOR: BLACK	201 LF
P-106	7' TALL DECORATIVE PRE-CAST CONCRETE NON-SCALEABLE WALL WITH ANTI-GRAFFITI COATING	4,054 LF
P-107	24' WIDE TUBE STEEL ROLLING GATE. COLOR: BLACK.	4
P-108	7' TALL CHAIN-LINK FENCE AND GATES (BY OTHERS)	1,213 LF
P-109	6" ON-SITE PERIMETER CURB - AT EDGE OF R.O.W.	3,310 LF
P-110	ENHANCED PAVING AT MAIN ENTRY. SEE CIVIL SHTS FOR SPEC. SEE L5 MATERIALS BOARD FOR REPRESENTATIVE PHOTO.	1,088 SF
P-111	LANDSCAPE MAINTENANCE BY CFD	
P-112	1 FT TALL EARTHEN BERM, WITH DRAINAGE SWALE BETWEEN BERM AND WALL. SEE CIVIL GRADING AND DRAINAGE PLANS.	
P-113	RETAINING WALL. SEE CIVIL PLANS FOR WALL HEIGHT, GRADING AND DRAINAGE.	

MAINTENANCE RESPONSIBILITIES
1. ON-SITE LANDSCAPE TO BE MAINTAINED BY OWNER.
2. LANDSCAPE WITHIN THE RIGHT-OF-WAY SHALL BE MAINTAINED BY THE CITY'S COMMUNITY FACILITIES DISTRICT (CFD) AND SHALL HAVE A METER SEPARATE FROM THE ON-SITE LANDSCAPE.

PLANT SCHEDULE

SYMBOL	QTY	BOTANICAL NAME	COMMON NAME	CONT	HT X WIDTH	WATER USE	
TREES							
	7	CERCIDIUM MICROPHYLLUM (PARKINSONIA MICROPHYLLUM)	LITTLE LEAF PALO VERDE	36"BOX	20`X20`	LOW	
	2	EXISTING ON-SITE TREE TO REMOVE		EXISTING			
	15	GEIJERA PARVIFLORA (EVERGREEN)	AUSTRALIAN WILLOW	24"BOX	30`X20`	LOW	
	34	LAURUS X `SARATOGA` (EVERGREEN)	SARATOGA HYBRID LAUREL	24"BOX	35`X25`	LOW	
	31	PINUS CANARIENSIS (EVERGREEN)	CANARY ISLAND PINE	24"BOX	60`X35`	LOW	
	18	QUERCUS ILEX (EVERGREEN)	HOLLY OAK	24"BOX	40`X40`	LOW	
	30	RHUS LANCEA STD (EVERGREEN)	AFRICAN SUMAC	24"BOX	40`X35`	LOW	
	38	RHUS LANCEA STD (EVERGREEN)	AFRICAN SUMAC	36"BOX	40`X35`	LOW	
	3	ULMUS PARVIFOLIA 'TRUE GREEN' (EVERGREEN/SEMI-EVERGREEN)	TRUE GREEN LACEBARK ELM	24"BOX	50`X50`	LOW	
SHRUBS							
	34	AGAVE PARRYI	PARRY'S AGAVE	5 GAL	30"X30"	LOW	
	16	ARTEMISIA X 'POWIS CASTLE'	POWIS CASTLE ARTEMISIA	5 GAL	3`X5`	LOW	
	5	CALLIANDRA CALIFORNICA	RED BAJA FAIRY DUSTER	5 GAL	5`X5`	LOW	
	76	CALLISTEMON CITRINUS (EVERGREEN)	LEMON BOTTLEBRUSH SHRUB	5 GAL	15`X15`	LOW	
	67	CALLISTEMON VIMINALIS `LITTLE JOHN` (EVERGREEN)	LITTLE JOHN WEEPING BOTTLEBRUSH	5 GAL	30"X30"	LOW	
	5	FOUQUIERIA SPLENDENS	OCOTILLO	5 GAL	10`HX12`W	LOW	
	202	FRANGULA CALIFORNICA (EVERGREEN)	EVE CASE COFFEEBERRY	5 GAL	8`X8`	LOW	
	58	GREVILLEA X 'LONG JOHN' (EVERGREEN)	LONG JOHN GREVILLEA	5 GAL	10`HX12`W	LOW	
	5	HESPERALOE PARVIFLORA	RED YUCCA	5 GAL	4`X4`	LOW	
	223	LEUCOPHYLLUM FRUTESCENS (EVERGREEN)	TEXAS SAGE	5 GAL	6`X6`	LOW	
	114	WESTRINGIA FRUTICOSA (EVERGREEN)	COAST ROSEMARY	5 GAL	4`X8`	LOW	
VINES							
	50	FICUS PUMILA (TWINING EVERGREEN VINE)	CREEPING FIG	5 GAL	6`X10`	MODERATE	
	14	GELSEMIUM SEMPERVIRENS (TWINING EVERGREEN VINE)	CAROLINA JESSAMINE	5 GAL	6`X10`	MODERATE	
	93	MACFADYENA UNGUIS-CATI (EVERGREEN, TENDRILS)	CAT'S CLAW CREEPER	5 GAL	6`X10`	LOW	
SYMBOL	QTY	BOTANICAL NAME	COMMON NAME	CONT	HT X WIDTH	WATER USE	SPACING
GROUND COVERS							
	59,756 SF	BACCHARIS PILULARIS `PIGEON POINT` (EVERGREEN)	PIGEON POINT COYOTE BRUSH	1 GAL	2`X8`	LOW	60" o.c.
	17,457 SF	DALEA GREGGII (EVERGREEN)	TRAILING INDIGO BUSH	1 GAL	1.5`X7`	LOW	60" o.c.
	12,540 SF	JUNIPERUS HORIZONTALIS WILTONII	CREEPING JUNIPER	1 GAL	1`X6`	MODERATE	48" o.c.
	22,979 SF	ROSMARINUS OFFICINALIS `HUNTINGTON CARPET`	HUNTINGTON CARPET ROSEMARY	1 GAL	1`X6`	LOW	48" o.c.
BIO-RETENTION AREA							
	6,903 SF	BOUTELOUA 'BLOND AMBITION'	BLUE GRAMA GRASS	1 GAL	2`X2`	LOW	30" o.c.
	20,020 SF	JUNCUS PATENS, DESCHAMPSIA CESPITOSA & IRIS DOUGLASIANA 60% JUNCUS, 20% DESCHAMPSIA, 20% IRIS, GROUPINGS OF 15 SQ FT	GREY RUSH, TUFTED HAIR GRASS & IRIS	1 GAL	2`X2`	LOW	24" o.c.
	12,451 SF	JUSTICIA CALIFORNICA & BACCHARIS PILULARIS 'TWIN PEAKS' 50% EACH, GROUPINGS OF 25 SQ FT	CHUPAROSA & DWARF COYOTE BRUSH	5 GAL	4`X4`	LOW	36" o.c.
	6,829 SF	MIMULUS CARDINALIS & ZAUSCHNERIA CALIFORNICA 50% EACH, GROUPINGS OF 25 SQ FT	SCARLET MONKEYFLOWER, CALIFORNIA FUCHSIA	1 GAL	3`X3`	LOW	36" o.c.

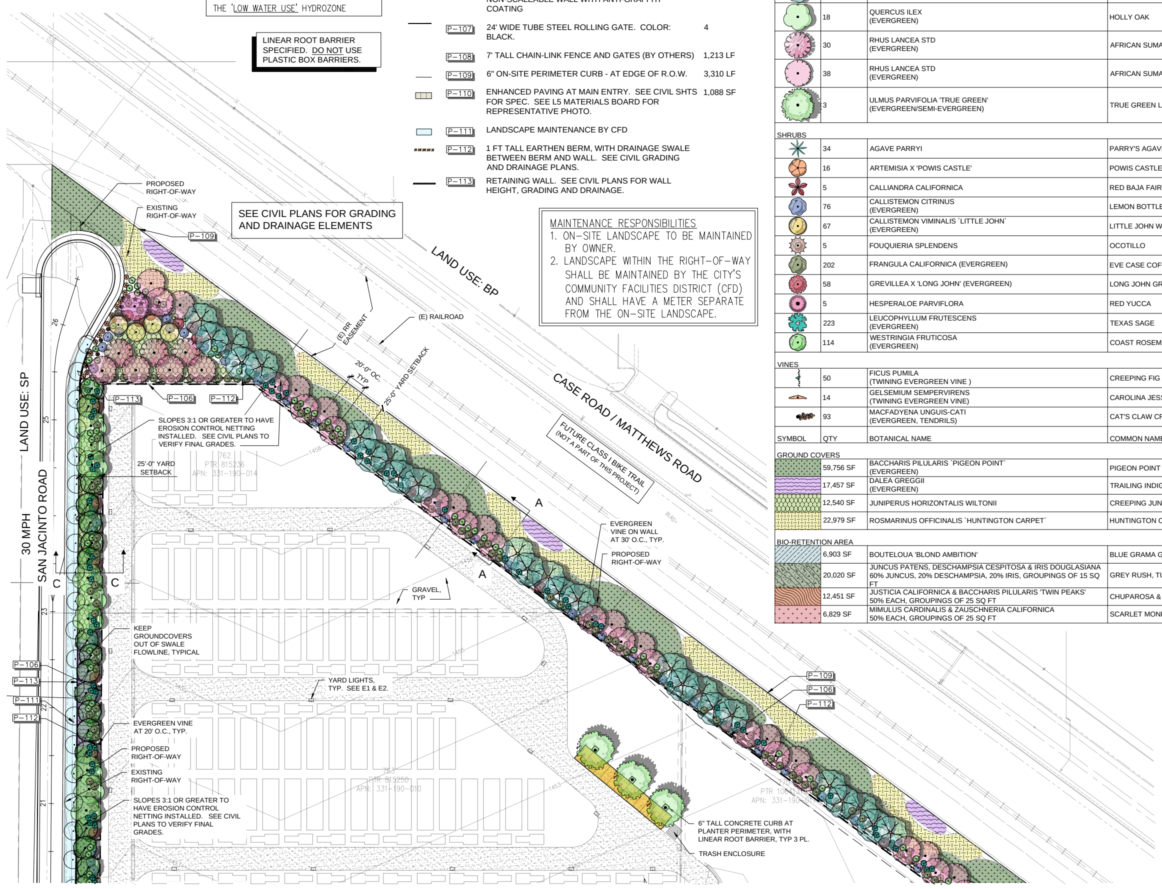
TOTAL ON-SITE LANDSCAPE AREA: 217,602 S.F.
TURF: 0 SF
IRRIGATED LANDSCAPE: 215,698 S.F. (subtract cobble from total)

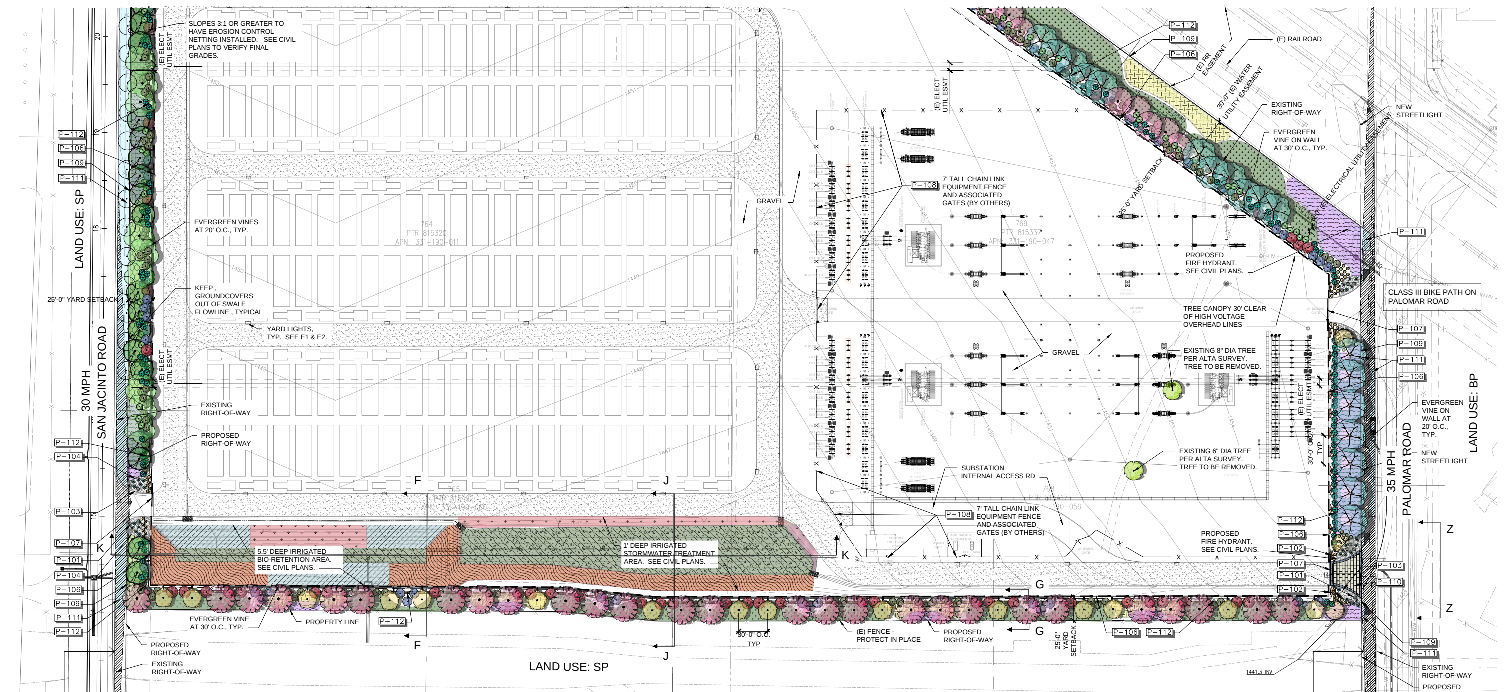
CITY OF MENIFEE SCREENING NOTE:
ALL PARKING, BUILDINGS, AND ON-SITE FACILITIES VISIBLE FROM ADJOINING PROPERTIES AND PUBLIC RIGHTS-OF-WAY (OFFSITE) SHALL BE EFFECTIVELY SCREENED WITH LANDSCAPING. SCREENING SHALL INCLUDE TREES, DENSE EVERGREEN SHRUBS, WALLS, EARTH BERMS OR A COMBINATION THEREOF.

CITY OF MENIFEE MINIMUM NURSERY CONTAINER SIZES:

TREES	24" BOX
ACCENT TREES	36" BOX
SHRUB	5 GALLON
GROUND COVERS/GRASSES/PERENNIALS	1 GALLON

A MINIMUM OF 10% OF TOTAL TREE QUANTITY SHALL BE SPECIMEN SIZE (36" BOX SIZE OR LARGER).



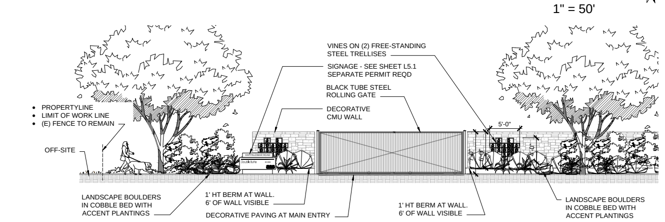


SIGHT DISTANCE TRIANGLES FOR SAN JACINTO ROAD ARE BASED ON DESIGN SPEED OF 30 MPH WITH A 330' CORNER SIGHT DISTANCE, USING THE CITY OF MENIFEE STD PLAN 81. NO TREES, WALLS, MONUMENTS, OR LANDSCAPE OVER 30" TALL IS ALLOWED WITHIN THE SIGHT TRIANGLE.

MAINTENANCE RESPONSIBILITIES
1. ON-SITE LANDSCAPE TO BE MAINTAINED BY OWNER.
2. LANDSCAPE WITHIN THE RIGHT-OF-WAY SHALL BE MAINTAINED BY THE CITY'S COMMUNITY FACILITIES DISTRICT (CFD) AND SHALL HAVE A METER SEPARATE FROM THE ON-SITE LANDSCAPE.

SIGHT DISTANCE TRIANGLES FOR PALOMAR ROAD ARE BASED ON DESIGN SPEED OF 35 MPH WITH A 385' CORNER SIGHT DISTANCE, USING THE CITY OF MENIFEE STD PLAN 81. NO TREES, WALLS, MONUMENTS, OR LANDSCAPE OVER 30" TALL IS ALLOWED WITHIN THE SIGHT TRIANGLE.

1" = 50'



ELEVATION Z-Z @ ENHANCED MAIN ENTRY - EAST

SOURCE: AES 2025

DUDEK

FIGURE 5
Preliminary Landscape Plan
Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6A

Visual Simulation - Aerial / Plan View

Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6B

Visual Simulation - Birdseye / Perspective View 1 (Before)

Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6C

Visual Simulation - Birdseye / Perspective View 1 (After)

Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6D

Visual Simulation - Birdseye / Perspective View 2 (Before)

Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6E

Visual Simulation - Birdseye / Perspective View 2 (After)

Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6F

Visual Simulation - Birdseye / Perspective View 3 (Before)

Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6G

Visual Simulation - Birdseye / Perspective View 3 (After)

Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6H

Visual Simulation - Street View 1 (Before)

Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6I

Visual Simulation - Street View 1 (After)

Double Butte Battery Storage Project

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SOURCE: AES, 2024

FIGURE 6J

Visual Simulation - Street View 2 (Before)

Double Butte Battery Storage Project

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SOURCE: AES, 2024

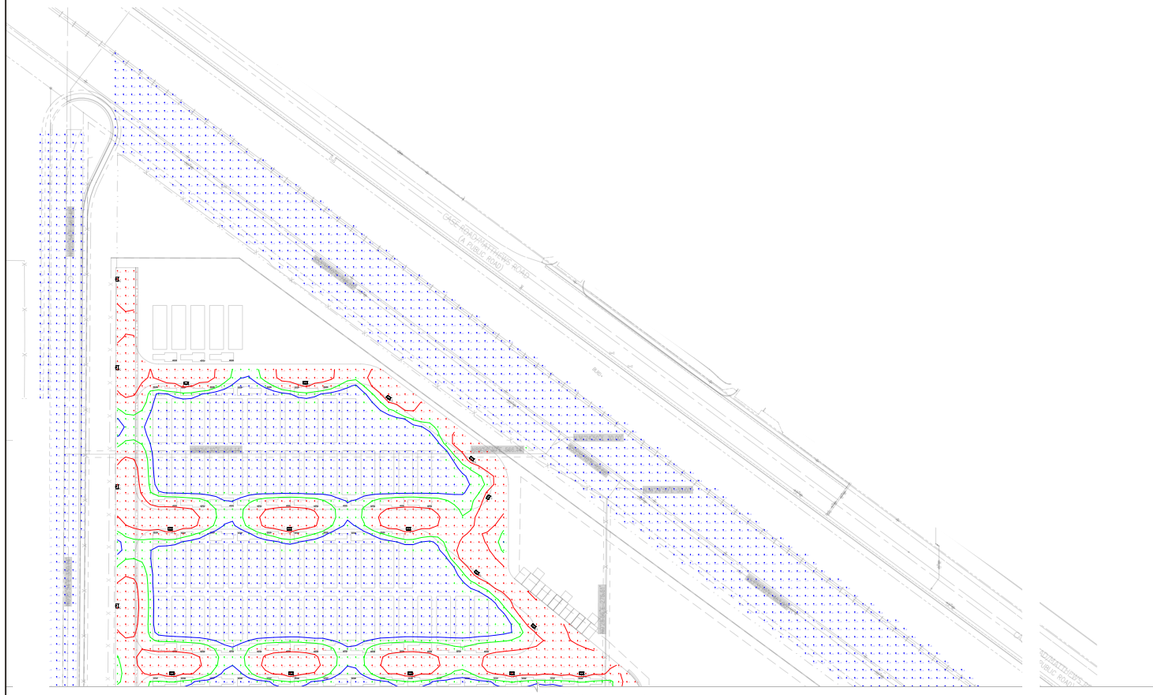
FIGURE 6K

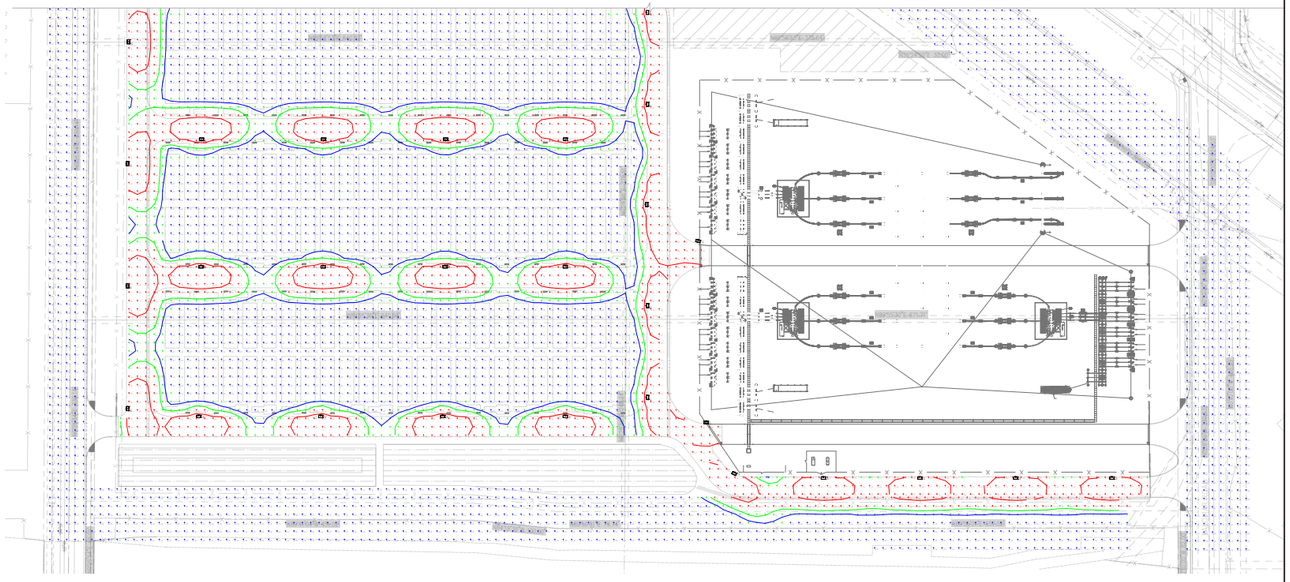
Visual Simulation - Street View 2 (After)

Double Butte Battery Storage Project

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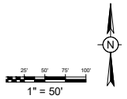


Luminaire Schedule

Symbol	Qty	Label	Arrangement	Description	Tag	LLF	Luminaire Lumens	Luminaire Watts	Total Watts
	47	ATBMIC_P103_R3_3K_HSS	Single	AUTOBAHN SERIES ATBMicro with 3000K, P103 Performance Output and R3 Optics, House-Side Shield and Dark Sky Association certified. Pole Mount at 24 feet above finished grade.	P1	0.800	3450	29	1363

Calculation Summary

Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
Street Lighting Spill NB	Illuminance	Fc	0.00	0.1	0.0	N.A.	N.A.
Street Lighting Spill SB	Illuminance	Fc	0.03	0.6	0.0	N.A.	N.A.
Substation Streets	Illuminance	Fc	0.18	0.9	0.0	N.A.	N.A.

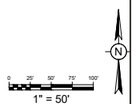


Luminaire Schedule

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Street Lighting Spill SB	Illuminance	Fc	0.03	0.6	0.0	N.A.	N.A.
Substation Streets	Illuminance	Fc	0.18	0.9	0.0	N.A.	N.A.



SOURCE: AES, 2024

FIGURE 7

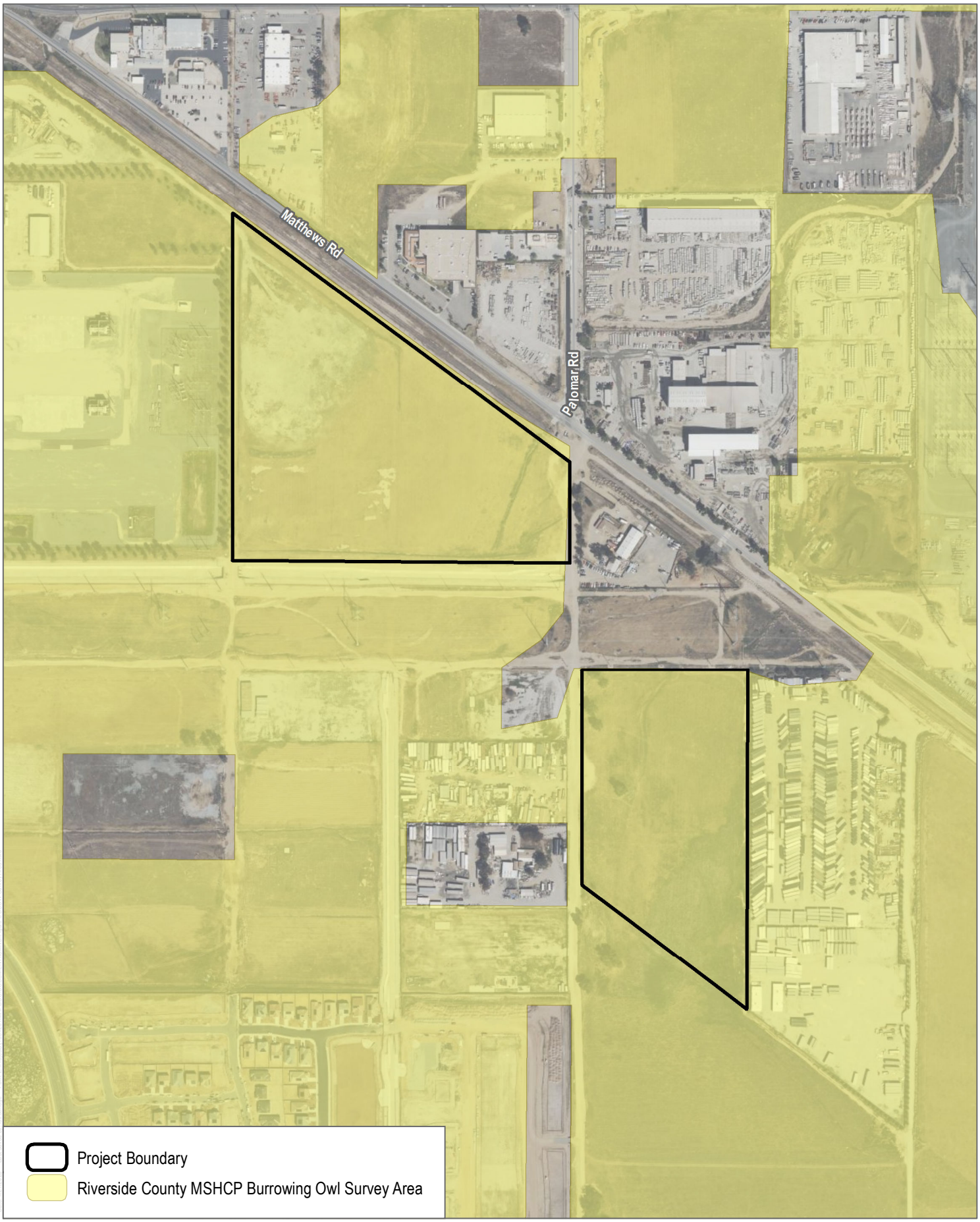
Preliminary Lighting Plan

Double Butte Battery Storage Project

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SOURCE: Bing Maps; County of Riverside 2022

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0 250 500 Feet

FIGURE 8

Riverside MSHCP Burrowing Owl Survey Area

Double Butte Battery Storage Project

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