

3.8 HAZARDS AND HAZARDOUS MATERIALS

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3.8.1 Definitions

Hazardous Materials

Hazardous materials are chemical and non-chemical substances that can pose a threat to the environment or human health if misused or released. Hazardous materials occur in various forms and can cause death; serious injury; long-lasting health effects; and damage to buildings, homes, and other property. Hazardous materials are used in industry, agriculture, medicine, research, and consumer goods. Hazardous materials can include explosives, flammable and combustible substances, poisons, radioactive materials, pesticides, petroleum products, and other materials defined as hazardous under the Resource Conservation and Recovery Act (RCRA) in 40 CFR 261. These substances are most often released during motor vehicle or equipment accidents or chemical accidents during industrial use. Hazardous substances have the potential to leach into soils, surface water, and groundwater if they are not properly contained.

Hazards

Physical hazards include proximity to airports, MCB CPEN restricted air space, wildland fire hazards, unexploded ordnances, and objects that could induce current and voltage and result in electrical shocks.

3.8.2 Environmental Setting

Existing Hazardous Sites

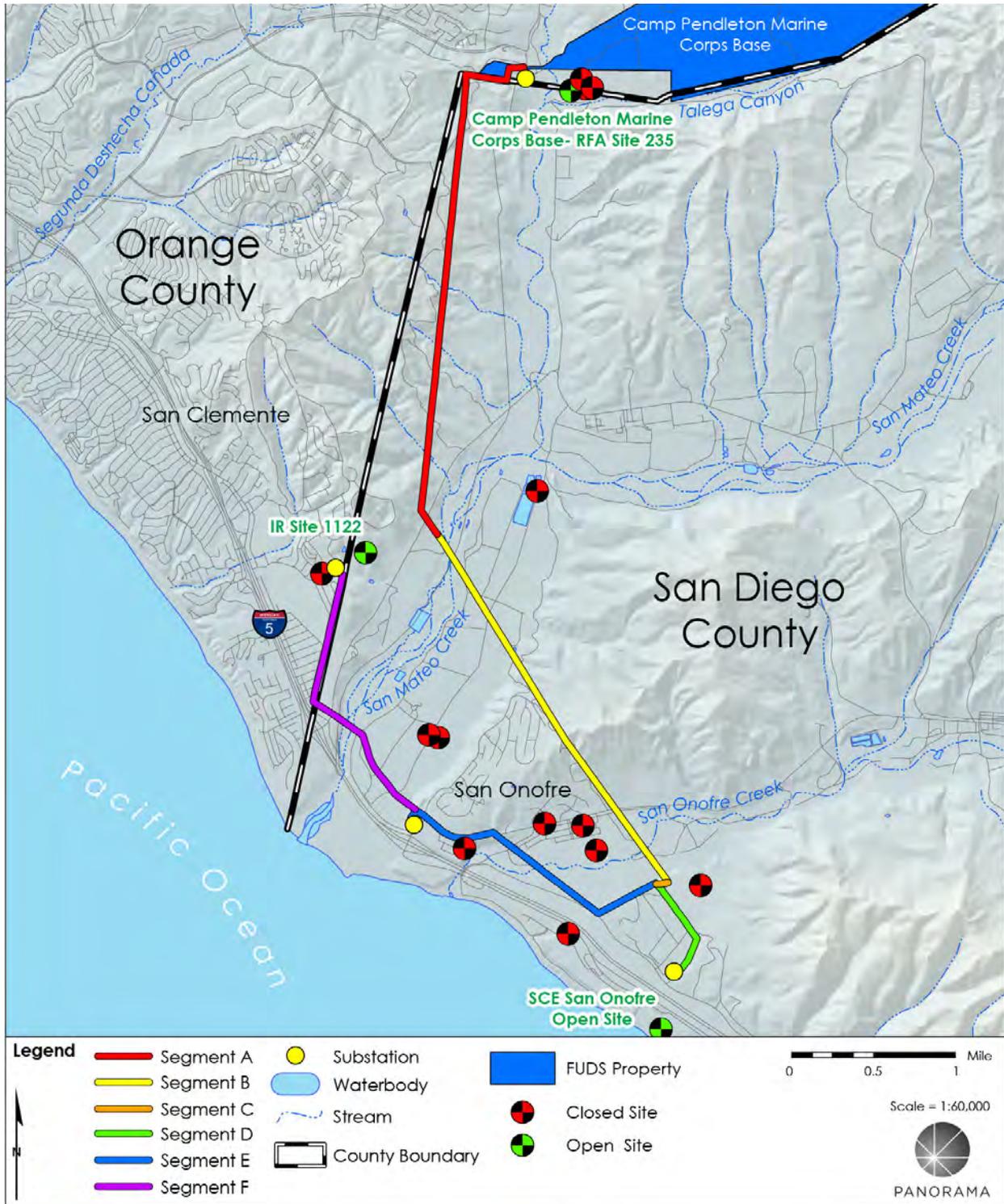
Hazardous materials sites were identified from the following SWRCB and California Department of Toxic Substances Control (DTSC) cleanup programs: Leaking Underground Storage Tank cleanup sites, Cleanup Program Sites, Military sites, Land Disposal sites, Permitted underground storage tank facilities, Waste Discharge Requirement sites, Irrigated Lands Regulatory Program sites, DTSC Cleanup, Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Evaluation, School Investigation, Military Evaluation, Tiered Permit, and Corrective Action.

One hazardous waste generator, SONGS, is located within 0.25 mile of the proposed project area. SCE operates and maintains SONGS. In 2013, SCE announced that it would cease power operations and decommission the generator's two remaining active reactors (SCE 2013).

No Superfund sites are located within 0.25 mile of the proposed project. The proposed project would be located within a military facility, and multiple closed military cleanup sites are located within 0.25 mile of the proposed project area. These sites are shown in Figure 3.8-1. Open hazardous sites within 0.25 mile of the proposed project are listed in Table 3.8-1.

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Figure 3.8-1 Hazardous Sites in the Proposed Project Vicinity



Sources: (ESRI 2016, SDG&E 2016a, USACE 2013, SWRCB 2016, DoN 2014)

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Table 3.8-1 Hazardous Materials Release Sites within 0.25 Mile of the Proposed Project

Site Name and Address	Distance from Proposed Project (feet)	Affected Medium	Chemical of Concern	Regulatory Listing	Status
Southern California Edison Co San Onofre 5000 Pacific Coast Hwy San Clemente, CA 92672	1,700	Contaminated Surface/ Structure, Sediments, Soil	<ul style="list-style-type: none"> Asbestos-Containing Materials Freon 113 Metals Radioactive Isotopes TPH-Motor Oil 	DTSC Cleanup Site Corrective Action	Active
MCB CPEN - RFA Site 235 Bldg 64333-64366 MCB CPEN, CA 92055	1,500	Soil	<ul style="list-style-type: none"> Diesel Heating Oil/ Fuel Oil 	Military Cleanup Site	Open - Remediation
Site 1122 Shot Fall Zone California Department of Parks and Recreation Lease Area	730	Soil, Sediment, Groundwater	<ul style="list-style-type: none"> Polycyclic Aromatic Hydrocarbon Lead 	Installation Restoration Site	Undergoing Site Inspection

Sources: (SWRCB 2016, DTSC 2016, MCB CPEN 2016, DoN 2014)

As shown in Figure 3.8-1, the area around Segment A near Talega Substation is a Formerly Used Defense Site (FUDS) under the Military Munitions Response Program (USACE 2013). Potential hazards in this area include unexploded ordnances.

Existing power line wood poles that would be removed under the proposed project are treated with chemicals that protect wood from rotting due to insects and microbial agents. These chemicals likely include pentachlorophenol, creosote, and chromated copper arsenate, which, for certain uses and quantities, can be considered hazardous materials and require specific handling procedures prescribed by state and federal regulations. Additionally, the base of some of the treated wood poles may be wrapped with copper naphthenate paper, also known as CuNap wrap. This paper has been accepted as a wood preservative for several decades and has been employed in non-pressure treatments of wood and other products. Copper naphthenate is a common preservative and its use has increased recently in response to environmental concerns associated with other wood treatment products.

Military Hazards

MCB CPEN is a live-fire training facility. Training areas facilitate combat readiness training from small arms training to large company-sized operations. MCB CPEN contains 100 established ranges, 53 Artillery Firing Areas, 7 Mortar Positions, 11 Mortar Firing Areas, and 12 Live-Fire and Maneuver Areas (MCB CPEN 2012).

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The proposed project area would fall within MCB CPEN's Section A and Bravo Three training areas, and the Area 62 Helo ILA is located within Artillery Firing Area 07 (MCB CPEN 2012). The proposed project would not be located within the vicinity of a MCB CPEN impact area. Impact areas are target areas designated to receive projectiles and explosives during weapons training and live-fire exercises. The closest impact area to the proposed project is located approximately 1.2 miles northeast of Segment E. While the proposed project would not be located in the vicinity of a MCB CPEN impact area, unexploded ordnances could occur in the proposed project area due to the proximity to active military training areas, areas historically used for live-fire training, and a FUDS.

Schools

Two schools are located within 0.25 mile of the proposed project area, as listed in Table 3.8-2 and shown on Figure 3.14-1 and Figure 3.14-2 in Section 3.14: Public Services.

Table 3.8-2 Schools within 0.25 Mile of the Proposed Project

School Name	Approximate Distance from Proposed Project
San Onofre Elementary School	950 feet north of Segment E
Concordia Elementary School	1,350 feet west of Segment F

Airports and Air Strips

No airports are located within 2 miles of the proposed project. The closest airports and air strips to the proposed project are:

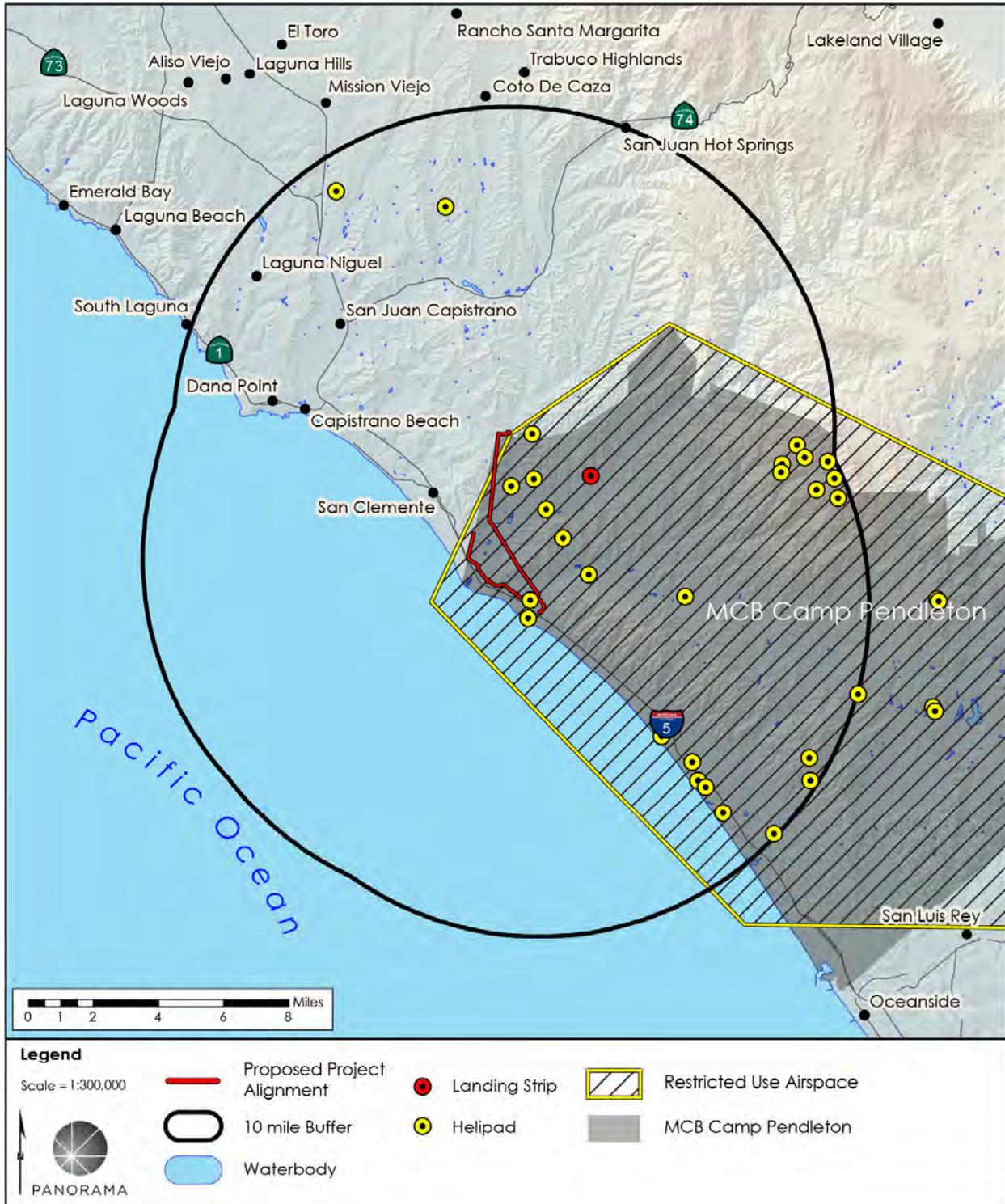
- Marine Corps Air Station Camp Pendleton, approximately 13 miles to the southeast
- McConville Air Strip, approximately 14.5 miles to the northeast
- Oceanside Municipal Airport, approximately 16 miles to the southeast
- John Wayne Airport, approximately 18.7 miles to the northwest

Local public airports would be used to stage proposed project helicopters when helicopters are not in use for construction.

Multiple helicopter landing facilities are located within the vicinity of the proposed project. SCE operates two helipads near SONGS, and MCB CPEN operates multiple military training helipads near the proposed project area, as shown in Figure 3.8-2. Aircraft involved in military training operations take off and land at MCB CPEN landing zones, Confined Area Landing sites, Vertical/Short Takeoff and Landing pads, the Helicopter Outlying Landing Field, and simulated amphibious assault ship flight decks. Helicopter operations include ordnance delivery, air-launched anti-armor missile training, night vision goggle training, parachute drops of supplies and personnel, vertical replenishment from ship-to-shore, external load training, door gunner training, Low Altitude Anti-Aircraft Defense training, and Helicopter Terrain Flight route operations (MCB CPEN 2012).

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Figure 3.8-2 Regional Airports and Helipads



Sources: (ESRI 2016, SDG&E 2016a, FAA 2016, United States Marine Corps 2005)

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The proposed project area is located within MCB CPEN Restricted Use Airspace, including the following:

- Restricted Area R-2503 A, which extends 2,000 feet amsl
- Restricted Area R-2503 B, which extends 15,000 feet amsl
- Restricted Area R-2503 C, which extends 11,000 feet amsl
- Restricted Area R-2503 D, which extends 27,000 feet amsl

Restricted Areas R-2503 A and B are approved for military use seven days a week from 6:00 am to midnight. Restricted Areas R-2503 C and D are available only for special operations (MCB CPEN 2012). The operation of nonparticipating civilian aircraft is limited within Restricted Use Airspace due to hazards such as artillery firing, aerial gunnery, or guided missiles. Pilots must receive authorization from the appropriate agency before entering these areas (FAA 2016).

Wildland Fire Hazards

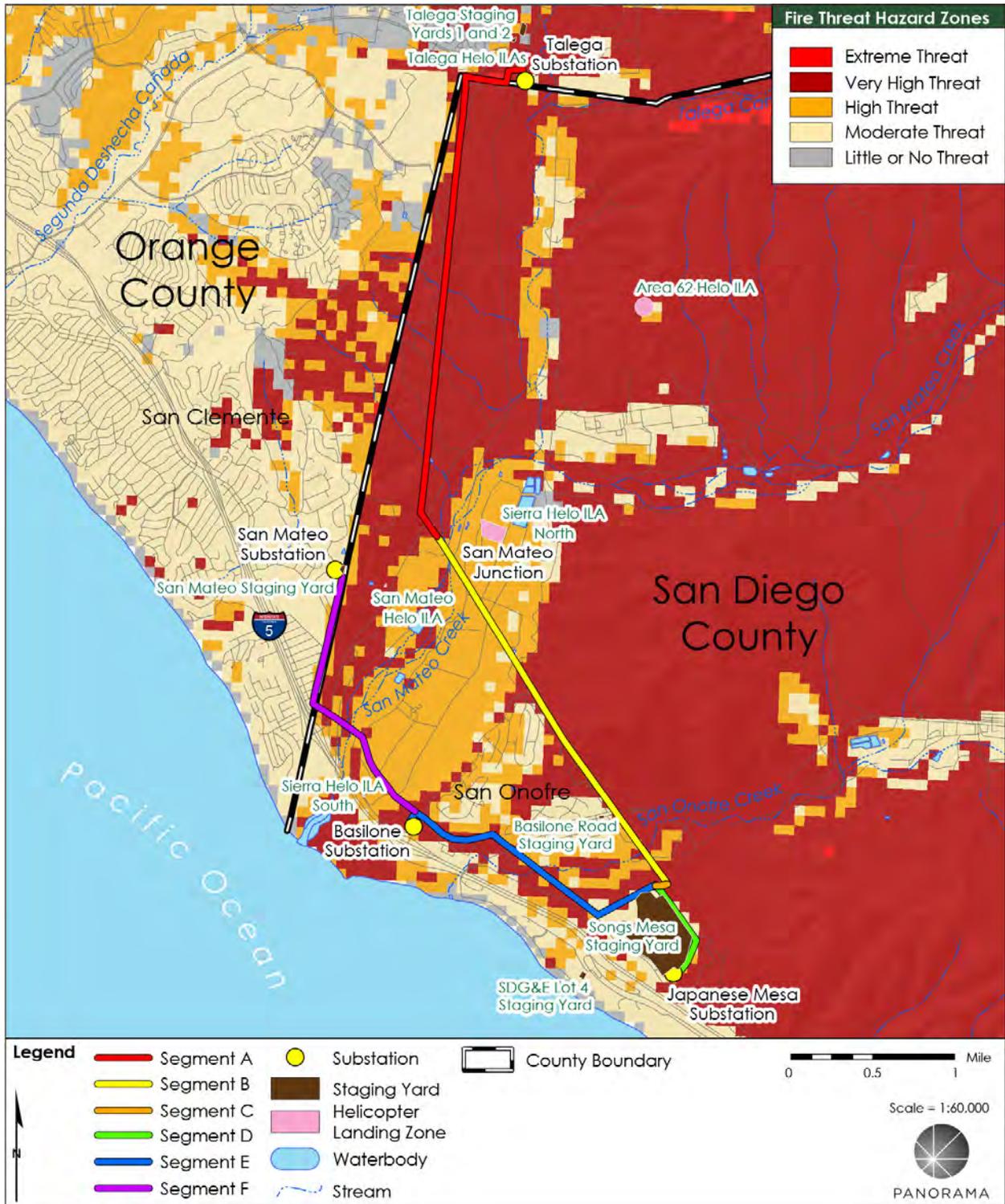
Wildfires are a public safety concern in San Diego County, Orange County, and at MCB CPEN. Most the proposed project would be surrounded by undeveloped land with potential fuel for wildland fires. Other portions of the proposed project area are located within the urban-wildland interface fire area, the area where houses intermingle with undeveloped wildland vegetation.

The California Department of Forestry and Fire Protection (CalFire) has rated most of the proposed project area as very high or high fire threat hazard zones; some smaller portions of the proposed project area are rated as moderate fire threat hazard zones (CalFire 2005). Fire hazard severity ratings are shown on Figure 3.8-3. No extreme fire hazard areas are located within the proposed project area. The easternmost portion of the proposed project would be located within a Federal Responsibility Area, in which the federal government would have responsibility for wildland fire protection. Other portions of the proposed project are located within San Diego's Local Responsibility Area (LRA) and the City of San Clemente's LRA. LRAs are areas where local government agencies have responsibility for wildland fire protection.

Military training operations heighten fire hazards at MCB CPEN, which has one of the highest ignition rates in the country with an average of 300 fires per year since 1968. Contributors to the high ignition rate include frequent ignition sources from weapons firing, explosions, and pyrotechnic devices; biological and climatic conditions conducive to fire in the late summer and fall; and large areas of open space with abundant vegetation (MCB CPEN 2012).

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Figure 3.8-3 Fire Hazard Zones



Sources: (ESRI 2016, SDG&E 2016a, CalFire 2005)

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3.8.3 Impact Analysis

Summary of Impacts

Table 3.8-3 presents a summary of the CEQA significance criteria and impacts from hazards and hazardous materials that would occur during construction, operation, and maintenance of the proposed project.

Table 3.8-3 Summary of Proposed Project Impacts from Hazards and Hazardous Materials

Would the Proposed Project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, or be located within the vicinity of a private airstrip, and result in a safety hazard for people residing or working in the project corridor?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Would the Proposed Project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Discussion

a) Would the proposed project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Significance Determination
	Less than significant with mitigation

Construction

Storage, Handling, and Use of Hazardous Materials Not Used for Blasting

Construction of the proposed project would require the use of hazardous materials including gasoline, diesel, hydraulic oils, lubricants, and equipment coolants associated with construction vehicles and equipment. Existing wood poles to be removed were likely chemically treated with creosote, pentachlorophenol, or other wood preservatives. These materials are considered hazardous because they are flammable and/or contain toxic compounds, such as VOCs and heavy metals. Waste generated during construction also has the potential to include hazardous materials. A hazardous materials release could occur during equipment and vehicle servicing and refueling, or from improper disposal of wood poles or hazardous wastes generated during construction.

AB 1353 requires that treated wood waste be disposed of in a hazardous waste landfill or in a composite-lined portion of a Regional Water Quality Control Board (RWQCB)-approved solid waste landfill. As discussed in Section 2: Project Description, existing wood poles would be donated for reuse or disposed of at Otay Landfill, which is a RWQCB-approved treated wood waste landfill (DTSC 2013). Compliance with state regulation would ensure that wood poles are properly disposed of, and the impact from wood pole disposal would be less than significant. However, spilled, leaking, or improperly disposed of hazardous materials associated with construction activities other than access road maintenance, could still create a significant hazard for construction workers, the public, and/or the environment, which would be a potentially significant impact.

MM Hazards-1 minimizes the accidental spill impact and hazardous materials exposure by requiring SDG&E to prepare and implement a Hazardous Substance Management and Emergency Response Plan (HSMERP). The HSMERP would include measures to ensure that hazardous materials are properly stored on site and that any accidental releases of hazardous

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materials would be properly controlled and quickly cleaned up. MM Hazards-4 defines spill control and response requirements for SDG&E's access road grading including compliance with the Base Spill Control and Countermeasures Plan. The impact from an accidental release of hazardous materials would be less than significant with mitigation. SDG&E compliance with a future access road agreement from MCB CPEN could satisfy the requirements of MM Hazards-4 if the agreement conditions are equal or more effective in mitigating impacts from hazardous materials.

Storage, Handling, and Use of Hazardous Materials for Blasting

The proposed project may require the use of cartridges containing primer for ignition and nitrocellulose propellant for blasting during pole and foundation excavations. Blasting would be performed by a trained contractor when required. The contractor would handle the blasting materials and may store them outside of the proposed project area. Alternatively, blasting materials may be stored in staging yards during specific periods when blasting is required. Improperly storing hazardous blasting materials would potentially create a significant public safety and environmental hazard, which would be a significant impact.

SDG&E would comply with all federal, state, and local regulations (27 CFR Part 555, CCR Title 19, Division 1, Chapter 10, and local municipal code Chapter 5, Article 3) relating to the handling and storage of blasting devices and related hazardous materials. However, if shrapnel is projected from the detonation site during blasting, a significant direct impact could occur. Blasting could create a significant hazard to the public if a person were to be close to the blast location.

MM Hazards-2 requires SDG&E to prepare and implement a site-specific blasting plan that would address the potential impacts to people from blasting activities. The site-specific blasting plan would identify the hazardous zone (i.e., the area where a person could be injured or killed if they were in that zone during controlled detonation) at each blasting location, provide methods for verifying that people are not within the hazardous zone prior to blasting, require the identification and temporary closure of adjacent trails located in proximity to the blasting site, and require coordination with MCB CPEN and USACE to identify any locations where blasting would be prohibited due to nearby unexploded ordnance. Implementation of MM Hazards-2 would ensure that no people would be located within the vicinity of a blasting site. Impacts would be less than significant with mitigation.

Operation and Maintenance

The proposed project would involve the replacement of two existing power lines with new power lines in approximately the same locations. Operation and maintenance of the new lines would involve the same equipment and vehicles as the existing power lines. Herbicides would continue to be used for vegetation clearance around the new pole structures in the same manner that herbicides are applied at the existing poles. Operation and maintenance of the proposed project would not increase any hazard associated with the routine transport, use, or disposal of hazardous materials. No impact would occur.

Mitigation Measures: MM Hazards-1, MM Hazards-2, and MM Hazards-4

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b) Would the proposed 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?	Significance Determination
	Less than significant with mitigation

The impact from accidental spills or releases of hazardous materials during construction is discussed under Impact a), above. Military training activities with live ammunition occur regularly at MCB CPEN, the area adjacent to Talega Substation, and the northernmost portion of Segment A that is part of the FUDS program. Due to the proposed project area's current and past military use, construction and maintenance workers could potentially encounter unexploded ordnance during project excavations, which could result in death or injury to workers and a significant impact. MM Hazards-3 requires pre-construction surveys of sites identified in the FUDS database, an unexploded ordnance investigation of known and potential proposed project areas used by the military, proper removal of any unexploded ordnance found, and training of personnel. MM Hazards-4 outlines procedure for unexploded munitions during routine access road grading. Impacts would be less than significant with mitigation.

Mitigation Measures: MM Hazards-3 and MM-Hazards 4

c) Would the proposed project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Significance Determination
	Less than significant with mitigation

Construction

Hazardous Emissions

Project construction equipment would emit TACs, particularly diesel particulate matter (PM_{2.5}), within 0.25 mile of two schools (Table 3.8-2). The emission of VOCs or PM_{2.5} at concentrations that exceed air quality standards would be a significant impact. The proposed project would not result in emissions in excess of air quality standards for VOCs or PM_{2.5} as shown in Section 3.3: Air Quality. The impact from emissions of VOC and PM_{2.5} would be less than significant.

As discussed in greater detail in Section 3.3: Air Quality, Impact d), CCR § 2480 limits idling at or within 100 feet of a school to 30 seconds or less. Furthermore, construction work would occur for only one to seven days at each of the proposed project pole sites within the transmission alignment, substantially limiting the emissions exposure at nearby schools. These schools would not be exposed to substantial pollutant concentrations during the limited work periods at any one location because of the short duration of construction. The impact would be less than significant.

Materials Handling

Project construction would require the use of motorized heavy equipment, including vehicles and helicopters that use gasoline, diesel, antifreeze, and lubricants. These hazardous materials would be used throughout the proposed project area and would be temporarily stored during

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construction at the various staging yards. Helicopter refueling would occur at helicopter ILAs, none of which are located within 0.25 mile of schools.

With the exception of helicopter fuel, the quantities of hazardous materials that could be spilled would be small, which would limit their ability to be transported to a school site, because small quantities would be quickly absorbed into the soil. However, hazardous materials spills resulting from fuel truck or storage tank fuel transfer incidents not related to access road maintenance and subsequent transport of spilled materials by wind or water to a school could result in a significant impact. MM Hazards-1 would reduce impacts by requiring SDG&E to prepare and implement a HSMERP. The HSMERP would include measures to ensure that any accidental releases of hazardous materials would be properly controlled and quickly cleaned up. The impact would be less than significant with mitigation.

Waste Handling

All waste would be disposed of in accordance with all applicable federal, state, and local laws regarding solid and hazardous waste disposal, and would be transported off site to a licensed landfill. No impact on schools located within 0.25 mile of proposed project areas would occur from waste handling.

Operation and Maintenance

Operation and maintenance of the reconducted power lines would involve the same equipment and vehicles use as the existing TL 695 and TL 6971 power lines. Operation and maintenance of the proposed project would not increase any hazard to schools associated with hazardous emissions or materials. No impact would occur.

Mitigation Measures: MM Hazards-1

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

Construction

The proposed project area would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Hazardous material sites with open cases are located within 0.25 mile of the proposed project area. These sites are described in Table 3.8-1.

The closest hazardous material site to the proposed project is IR Site 1122, located 730 feet from San Mateo Substation and the San Mateo staging yard. IR Site 1122 is in the site investigation phase of the cleanup process. Soil, groundwater, and sediments are potentially contaminated with lead and polycyclic aromatic hydrocarbon. Proposed project construction activities near IR Site 1122 would include overhead work and pole topping, which would not require excavation. Because excavation would not be required for proposed project construction within the vicinity

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of IR Site 1122, contaminated soil, sediments, or groundwater would not be encountered. No impact would occur from IR Site 1122.

MCB CPEN RFA Site 235, which has soil affected with diesel and heating/fuel oil, is located approximately 1,500 feet east of Pole 1 and the stringing site within Talega Substation. RFA Site 235 is separated from the proposed project area by a steep hillslope and a stream. The proposed project would not encounter any contaminants from RFA Site 235 because contaminants would not mobilize upgradient toward the proposed project. Impacts from RFA Site 235 would be less than significant.

The SCE San Onofre Site has affected surface, structure, sediments, and soil with the following potential contaminants of concern: asbestos-containing materials, Freon 113, metals, radioactive isotopes, and tph-motor oil. The area is associated with a former water neutralization tank for SONGS and is categorized as an area of concern currently undergoing decontamination activities. The site is located approximately 1,750 feet south of Poles 101 and 102, the SONGS Mesa staging yard, and Japanese Mesa Substation. Excavations for concrete pier foundations that would be installed in proximity to the SCE San Onofre Site would range in depth from 30 to 40 feet. The potentially contaminated soils and groundwater are separated from the project area by a major highway (I-5) and are downgradient from the project area; therefore, contaminated soils or groundwater from the SCE San Onofre Site would not occur in the project area. No impact from contaminated soils would occur.

Access Roads

During access road maintenance, contaminated groundwater or soil could potentially be encountered if contaminants have spread to the area where roadway excavation would occur. Exposure to contaminated soil or groundwater could occur and would be considered a significant impact. MM Hazards-4 requires that ES Installation Restoration/Remediation Section be contacted if discolored or odorous soil is discovered during access road maintenance. Impacts from access road grading would be less than significant with mitigation. SDG&E compliance with a future access road agreement from MCB CPEN could satisfy the requirements of MM Hazards-4 if the agreement conditions are equal or more effective in mitigating impacts from hazardous materials.

Operation and Maintenance

Operation and maintenance activities for the proposed power poles and conductor would not involve excavation activities near open hazardous sites. Operation and maintenance of the reconducted power lines would involve the same activities in approximately the same locations as the existing TL 695 and TL 6971 power lines. Access road grading activities could involve excavation within areas of contaminated soils and potentially cause exposure of contaminated soils or groundwater, which would be a significant impact. MM Hazards-4 requires that ES Installation Restoration/Remediation Section be contacted if discolored or odorous soil is discovered during access road maintenance. Impacts from access road grading would be less than significant with mitigation. SDG&E compliance with a future access road

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agreement from MCB CPEN could satisfy the requirements of MM Hazards-4 if the agreement conditions are equal or more effective in mitigating impacts from hazardous materials.

Mitigation Measures: MM Hazards-4

<p>e) Would the proposed project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, or be located within the vicinity of a private airstrip, and result in a safety hazard for people residing or working in the project corridor?</p>	<p>Significance Determination</p> <p>Less than significant</p>
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Construction

The proposed project would not be located within an airport land use plan, within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip. The closest airport is a military airport at Marine Corps Air Station Camp Pendleton, located 13 miles southeast of the proposed project. The closest private air strip, McConville Air Strip, is located approximately 14.5 miles northeast of the proposed project in Lake Elsinore. The closest private helipads to the proposed project are SCE Songs Mesa Heliport (250 feet from SONGS Mesa staging yard) and SCE San Onofre Heliport (0.35 mile southwest of SONGS Mesa staging yard). MCB CPEN operates additional helipads and one landing strip within 10 miles of the proposed project to accommodate a broad range of helicopter training activities. MCB CPEN’s Helicopter Landing Zone Sim Landing Platform Dock Flight Deck is located within the proposed project’s Area 62 helicopter ILA.

The proposed project would be located within MCB CPEN Restricted Use Airspace. Nonparticipating civilian aircraft are restricted from entering airspace above MCB CPEN due to air and ground training activities that occur on the Base. MCB CPEN has sole authority over approving and scheduling users and activities within this airspace, including ground, sea, and aviation operations.

The proposed project would require the use of helicopters for conductor installation and potentially for the transport of materials. One light-, medium-, or heavy-duty helicopter would be used for approximately fourteen days (four to five hours each day). The proposed project would use local public airports, including Oceanside Municipal Airport and McClellan-Palomar Airport, for helicopter staging. Helicopters would also land at the helicopter ILAs shown in Appendix A.

Construction of the proposed project would temporarily introduce civilian air traffic to restricted military airspace, which could result in a safety hazard for both proposed project helicopter operators and military personnel. The shared use of MCB CPEN’s Helicopter Landing Zone Sim Landing Platform Dock Flight Deck and Area 62 helicopter ILA could present additional conflicts if the flight deck were used for military training operations concurrently with proposed project construction. SDG&E would follow all FAA recommendations, which would include receiving authorization from MCB CPEN regarding helicopter operations and flight plans throughout MCB CPEN Restricted Airspace during

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project construction. By obtaining MCB CPEN authorization for helicopter use in restricted air space, the impact from helicopter activities would be less than significant.

Helicopter flight paths during project construction would generally be limited to the existing easement and landing zones. If any helicopter flights are proposed within 1,500 feet of residences, SDG&E would need to prepare a Congested Area Plan to comply with FAA regulations. A Congested Area Plan would be prepared based upon actual helicopter usage, pursuant to FAA regulations. There would be no impact to people residing or working in the proposed project corridor because SDG&E would adhere to all aviation rules and regulations and coordinate helicopter operations with MCB CPEN. The impact would be less than significant.

Operation and Maintenance

The proposed project would involve the replacement of existing wood poles with new, taller steel pole structures. The proposed pole structures would be an average of 20 feet taller than the existing poles, ranging from 23 to 110 feet above ground in height. SDG&E conducted a review of all proposed poles and catenaries for FAA compliance under Title 14 CFR Part 77 using the FAA's Notice Criteria Tool and found that some replacement poles exceed the height threshold triggering FAA notification and review per FAA Regulations and Title 14 CFR, Section 77.9. SDG&E has filed the required Notice of Proposed Construction or Alteration Application with the FAA (SDG&E 2016b). Pursuant to 14 CFR Part 77, SDG&E would also be required to electronically submit FAA Form 7460-2, Notice of Actual Construction or Alteration, within five days after the construction reaches its greatest height. Compliance with FAA notification requirements and airspace review recommendations would ensure the impact would be less than significant.

Mitigation Measures: None required.

f) Would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Significance Determination
	Less than significant with mitigation

Construction

Temporary lane closures within MCB CPEN may be necessary during proposed project construction to ensure safety of the public and workers. Temporary lane closures from pole replacement or access road grading could impair implementation of an emergency response or evacuation plan or disrupt emergency vehicle traffic and access, which would be a potentially significant impact. MM Traffic-2 requires SDG&E to develop Traffic Plans and implement MCB CPEN Traffic Control Procedures prior to any traffic diversion, lane closure, and road closure. MCB CPEN's review and approval of Traffic Plans would ensure emergency access throughout any road or lane closure or traffic diversion. Implementation of MM Traffic-2 would avoid or minimize potential impacts on emergency response times during conductor or pole replacement. MM-Traffic-4 requires SDG&E to prepare a Traffic Control Plan as part of the

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Traffic Control Permit in areas where access road grading or maintenance may temporarily affect traffic flow. MM Traffic-4 would reduce the impact from temporary lane closures associated with access road maintenance activities. Impacts on emergency response or evacuations plans would be less than significant with mitigation. SDG&E compliance with a future access road agreement from MCB CPEN could satisfy the requirements of MM Traffic-4 if the agreement conditions are equal or more effective in mitigating impacts on emergency response.

Operation and Maintenance

Routine operation and maintenance of the proposed project could involve road closures during access road maintenance activities. Temporary road closures could interfere with emergency response if the activities were not properly coordinated with MCB CEPN. MM-Traffic-4 requires SDG&E to prepare a Traffic Control Plan as part of the Traffic Control Permit in areas where access road grading or maintenance may temporarily affect traffic flow. MM Traffic-4 would reduce the impact from temporary lane closures associated with access road maintenance activities. The impact would be less than significant with mitigation. SDG&E compliance with a future access road agreement from MCB CPEN could satisfy the requirements of MM Traffic-4 if the agreement conditions are equal or more effective in mitigating impacts on emergency response.

Mitigation Measures: MM Traffic-2 and MM Traffic-4 (refer to Section 3.16: Transportation and Traffic)

<p>g) Would the proposed project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</p>	<p>Significance Determination</p> <p>Less than significant</p>
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Construction

Most of the proposed project would be located on lands designated by CalFire as high to very high threat for fire hazard (refer to Figure 3.8-3). Portions of the proposed project area would be located within undeveloped areas and other portions would be within the urban-wildland interface fire area. Heat or sparks from vehicles or equipment have the potential to ignite dry vegetation and cause wildfires. Worker behavior such as smoking and disposing of cigarettes or parking vehicles on dry vegetation could also create sparks and ignite a fire. Vehicles and equipment would access pole work areas via existing paved, dirt, and/or gravel access roads and overland travel routes, which would be cleared of brush to reduce fire potential. Vegetation clearance within all existing easements would meet all state and CPUC clearance requirements (i.e., CPUC GO 95).

SDG&E has prepared a site-specific Construction Fire Prevention Plan, which includes procedures and policies that aim to decrease the risk for wildfire ignition and increase fire

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suppression capabilities. Appendix E contains the TL 695 and TL 6971 Construction Fire Prevention Plan in its entirety. The Construction Fire Prevention Plan includes:

- Minimum requirements for firefighting equipment, including size and response time requirements
- Requirements for carrying emergency fire suppression equipment
- Conducting “tailgate” meetings that cover fire safety issues
- Restrictions on smoking
- Construction restrictions during red flag warnings
- Work limitations for “elevated” to “extreme” fire danger days
- Assignment of specific “Fire Patrol” to perform monitoring and first response onsite

Adherence to SDG&E’s site-specific Construction Fire Prevention Plan would reduce impacts from fire hazards to people and structures caused by proposed project construction. The impact would be less than significant.

Operation and Maintenance

The proposed project involves replacement of existing wood poles with steel poles, which have a lower potential for ignition. The risk of wildfire from arcing or fault conditions on the reconducted power line would be the same as existing conditions, because the power line would operate according to the same CPUC specifications and requirements for conductor clearance (e.g., G.O. 95) as the existing power line. The fire risk during proposed project operation would be slightly reduced from baseline conditions due to the replacement of wood poles with fire resistant steel poles. No adverse impact would occur.

Mitigation Measures: None required.

3.8.4 Mitigation Measures

MM Hazards-1: Hazardous Substance Management and Emergency Response Plan (HSMERP)

SDG&E shall prepare and incorporate methods and techniques to minimize the exposure of the public to potentially hazardous materials during all phases of project construction and post-construction operation into a Hazardous Substance Management and Emergency Response Plan (HSMERP). The HSMERP shall be submitted to the CPUC for review and approval at least 30 days prior to project construction. The HSMERP measures shall require implementation of appropriate control methods and approved containment (e.g., use of partial or total enclosures, hazardous material handling methods, ventilation requirements, and employee training) and spill control practices for construction and on-site hazardous material storage.

Spill Control. The HSMERP measures shall also include, but not be limited to, the following:

- Proper disposal of contaminated soils and materials (i.e., clean up of materials)
- Daily inspection of vehicles and equipment parking near sensitive resource areas during construction and of spill containment procedures
- Emergency response and reporting procedures to address hazardous material releases
- Adequate operation and safety buffering and grounding measures

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- Fueling of any vehicles, equipment, and helicopters in staging yards or on streets paved with secondary containment and away from sensitive resource areas (e.g., preserves, designated open space areas, conserved habitat)
- Fuels and lubricating oils for vehicles and heavy equipment shall not be stored or transferred within 100 feet of any waterbodies, unless isolated from waterbodies by secondary containment
- Emergency spill supplies and equipment shall be available to respond in a timely manner if an incident should occur
- Response materials such as oil-absorbent material, tarps, and storage drums shall be available at the project site at all times during construction and shall be used as needed to contain and control any minor releases
- Placement of minor amounts of fuel, lubricants, and hydraulic fluid for equipment operation in appropriate storage tanks on the bed of fueling vehicles when needed
- Location of bulk lubricating oil, hydraulic fluids, and other materials used for vehicle and equipment maintenance at staging yards
- Use of secondary containment and spill rags when fueling
- Discourage "topping-off" fuel tanks
- Spill kits for all fuel trucks and fueling areas

Storage, Handling, and Disposal. All hazardous materials and hazardous wastes shall be handled, stored, and disposed of in accordance with all applicable regulations by personnel qualified to handle hazardous materials. With the exception of wood poles, the plan shall specify that all hazardous materials shall be collected and stored in project-specific containers until they are transported to an appropriately licensed and permitted waste disposal facility. Wood poles shall be transported off site once removed from the ground and temporarily stored in project-specific containers at an SDG&E facility. As containers are filled, poles shall be transported to an appropriately licensed Class I landfill or the composite-lined portion of a solid waste landfill..

Applicable Locations: All proposed project work areas.

Performance Standards and Timing:

Before Construction:

The HSMERP is submitted to the CPUC

During Construction:

The CPUC-approved HSMERP is implemented for the proper handling, storage, containment, control, and disposal of hazardous materials and waste

After Construction: N/A

MM Hazards-2: Site-Specific Blasting Plan

If blasting is required, the construction contractor shall ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. SDG&E or its contractor shall prepare site-specific blasting plans, notification requirements, and monitoring procedures for each blasting location proposed as required below:

Blasting Plan. A site-specific blasting plan shall be prepared prior to rock blasting in any location where blasting is required. Each blasting plan shall identify a hazardous zone for people during blasting. The hazardous zone shall be defined as the area where a person could be injured or killed if they were in that zone during controlled detonation. Each blasting plan shall include methods to verify that personnel or members of the public are located outside of the hazardous zone. In addition, each blasting plan shall identify the facilities that are adjacent to the blasting sites and that would require temporary closure during blasting activities. Finally, each blasting plan shall include documentation of SDG&E's coordination with MCB CPEN and USACE to identify any locations where controlled detonation would be prohibited because the detonation site is located near unexploded ordnances.

Blasting plans shall be submitted to MCB CPEN for review and approval before blasting at each site.

Approved Blasting Plans shall then be submitted to the CPUC for review at least two weeks prior to

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blasting at each site. SDG&E's contractor shall prepare daily blasting-related reports that include: Blast Report, Seismograph Monitoring Report, Inspection Report, Blasting Complaint Report, and Pre-Blast Inspection Report.

Notification. SDG&E shall notify all sensitive receptors within 1,000 feet of the area of effect at least one week prior to the blasting event. The notification shall include the time and location of the blasting and provide best management practices that people can use to reduce the noise level experienced at the time of the blasting (i.e., stay indoors and close windows). SDG&E shall also alert nearby residents immediately prior to blasting by sounding warning signals/sirens.

Monitoring. Immediately prior to controlled detonation, SDG&E personnel shall visually verify that no people are located within the hazardous zone. SDG&E shall follow all required monitoring protocols described in the blasting plan.

Minimize Damage. Adjacent structures within 500 feet of blasting locations shall be surveyed prior to blasting to determine their vulnerability to damage and to document their current physical exterior condition. Blasting shall not be allowed where damage to vulnerable structures is likely to occur; a chemical agent for rock fracturing or a rock anchoring or mini-pile system shall be used instead in such circumstances. The following provisions shall be employed to minimize risk of damage to structures in the area:

- Blasting mats shall be employed to eliminate flyrock.
- SDG&E's contractor shall employ proper stemming in the drill holes to control flyrock. Stemming shall be left at the top of blast holes to control/eliminate airblast.
- If any structure is inadvertently adversely affected by construction vibration, the structure shall be restored to conditions equivalent to those prior to blasting. SDG&E shall then fairly compensate the owner of any damaged structure for lost use.

Applicable Locations: All blasting locations

Performance Standards and Timing:

Before Construction:

- (1) Site-specific blasting plans are submitted to MCB CPEN
- (2) MCP CPEN-approved blasting plans are submitted to the CPUC prior to blasting

During Construction:

- (1) CPUC-approved blasting plans are implemented
- (2) Sensitive receptors are notified and alerted prior to blasting
- (3) Structures within 500 feet of blasting locations are surveyed prior to blasting
- (4) Methods other than blasting are used to fracture rock near vulnerable structures
- (5) Daily blasting-related reports are submitted to the CPUC

After Construction:

- (1) Inadvertently affected structures are restored to prior conditions
- (2) owners of damaged structures are compensated as necessary

MM Hazards-3: Unexploded Ordnance and Worker Safety Training

SDG&E shall obtain a trained contractor for the pre-construction survey, personnel training, and removal of all unexploded ordnances that are found in the proposed project area. An unexploded ordnance investigation of known and potential areas used by the military along the easement shall be undertaken by a trained contractor. If unexploded ordnance is found, they shall be removed by the trained contractor.

Caution should always be used when digging, drilling, grading, or any earth movement occurs. Should UXO be located, the "Three "R" method should be used. Recognize, Retreat, Report to the Provost Marshall's Office at (760) 725-3888 or dial 911 immediately..

Applicable Locations: FUDS site, proposed project alignment within MCB CPEN

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Performance Standards and Timing:

Before Construction:

- (1) Unexploded ordnance are investigated and disposed of
- (2) Safety training program is prepared and delivered
- (3) A copy of the training material and trainee sign-in sheets are submitted to the CPUC

During Construction:

Contractors implement the "Three R's" method and report any unexploded ordnance

After Construction: N/A

MM Hazards-4: Hazardous Materials Measures for Access Road Grading

Spill Controls and Countermeasures. The project must comply with the Base Spill Control and Countermeasures Plan, which is available by contacting the ES Spill Prevention and Planning Section at (760) 725-9743/9768. SDG&E will be responsible for their own hazardous material accidents in accordance with Base, local, state, and federal laws and regulations including clean up, and associated costs. All spills must be reported to the ES Spill Prevention and Planning Section immediately. This Section will make the appropriate regulatory reporting notifications for the spill.

Munitions.

- a. Caution should always be used when digging, drilling, grading, or any earth movement occurs. Should Unexploded Ordnance (UXO) be located, the "Three R" method should be used. Recognize, Retreat, Report to the Provost Marshall's Office at (760) 725-3888 or dial 911 immediately.
- b. All range soil shall remain within the range boundary and shot fall area and shall continue to be used for the same purpose. If any soil is to be removed from the range, appropriate hazardous constituent sampling and testing shall be completed. If soil is determined to be hazardous waste, it shall be packaged, stored, and shipped in accordance with hazardous waste guidelines and regulations.
- c. All hazardous waste manifests shall be signed by the ES Hazardous Waste Section, (760) 725-4375. If solid Lead or Copper is removed from the range, it may be recycled in accordance with the base Qualified Recycling Program (QRP) regulations.
- d. Any item meeting the definition of a military munition, as found in the 40 CFR 266 (Military Munitions Rule), shall be properly demilitarized prior to transport from an operational range. Munitions meeting this definition without being properly demilitarized for recycling or resale, shall be considered hazardous waste and treated as such. Proper handling, packaging, storing, and shipping as designated by the Resource Conservation and Recovery Act (RCRA) will apply. All questions shall be directed to the Military Munitions Rule Manager at (760) 725-9774.

Hazardous Waste.

- a. Ensure proper hazardous waste manifest procedures are followed for all hazardous waste being generated and transported off Camp Pendleton. The ES Hazardous Waste Section personnel are the only personnel authorized to sign manifests for Camp Pendleton. All hazardous waste manifests shall be approved and signed by the Hazardous Waste Branch personnel prior to the waste leaving Camp Pendleton.
- b. If hazardous waste is generated, it shall be stored in compliance with local, state and federal regulations. Hazardous waste shall be removed from Camp Pendleton within 60 days of initial generation. Please contact the ES Hazardous Waste Section at (760) 725-4375 if you have any questions regarding Camp Pendleton's storage requirements

Installation Restoration/Remediation. During construction if soil contamination (discolored and or odorous) is discovered contact the ES Installation Restoration / Remediation Section at (760) 725-9744/9774 for necessary remedial requirements.

Applicable Locations: All road grading areas

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Performance Standards and Timing:

Before Construction: N/A

During Construction:

Implement measures during road grading

After Construction: N/A

3.8.5 References

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