5.8 Hazards and Hazardous Materials

Definitions

The U.S. Department of Homeland Security defines "hazard" as a natural or man-made source or cause of harm or difficulty (DHS 2010). California health and safety statutes define the term "hazardous material" as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment (California Health and Safety Code [HSC], Chapter 6.95, Section 25501). Under Title 22 of the California Code of Regulations (CCR), the term hazardous material is further defined as:

> A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (CCR, Title 22, Section 66260.10).

California health and safety statutes and regulations specifically define the term hazardous waste to include waste regulated by the Resource Conservation and Recovery Act (RCRA), extremely hazardous waste, and acutely hazardous waste (California HSC §25117). CCR, Title 22, Division 4.5, Chapter 11, Section 66261.3 also defines hazardous waste.

Hazardous substances are defined more broadly in California HSC, Chapter 6.8, Section 25316 as being inclusive of hazardous materials, hazardous wastes, hazardous contaminants, and hazardous pollutants. In this section, the term "hazardous materials" is used to denote hazardous products and hazardous commodities that are transported or used in commerce. The term "hazardous waste" is used for waste materials that are destined for treatment or disposal and have been defined in state or federal regulations as being hazardous waste.

Exposure to hazardous materials can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials. If not properly handled or contained, hazardous materials also have the potential to be released into the environment and can cause public health and environmental concerns. Some hazardous materials are also fire and explosion hazards. For this reason, the storage, handling, transport, and disposal of hazardous materials is regulated by federal, state, and local governmental agencies (FEMA 2008).

5.8.1 Environmental Setting

Hazards Materials along Project Alignment

The proposed project would include the removal approximately 6 miles of existing overhead line and associated poles (TL666D), the reconfiguration of Line TL674A into an approximately 1.1-mile-long underground configuration, and the conversion of portions of existing overhead lines C510 and C738 also to underground configurations.

The proposed project would require the transport and use of unspecified quantities of hazardous materials such as fuels, lubricants, coolants, industrial gases (such as acetylene, argon, oxygen, and propane), and cleaning chemicals during construction. Table 5.8-1 provides an applicant-supplied general listing of the types of hazardous materials anticipated to be used during construction.

Table 5.8-1 Hazardous Materials Typically Used During Construction and Maintenance

Fuels and Fuel Additives	Vehicle Maintenance
Gasoline Diesel Propane (Compressed Gas) Diesel fuel additive Gasoline treatment Diesel de-icer Compressed oxygen Acetylene	Antifreeze (ethylene glycol) Batteries/Battery acid (in vehicles) Motor oil Automatic transmission fluid Brake fluid Starter fluid Two-cycle oil (contains distillates and hydro-treated heavy paraffinic) Chain lubricant (contains methylene chloride) Connector grease (penotox) Lubricating grease Puncture seal tire inflator Hydraulic fluid
Other Materials Used	
Methyl alcohol Ammonium hydroxide ~~ZIP (1,1,1-trichloroethane)~~ Eyeglass cleaner (contains methylene chloride) Hot stick cleaner (cloth treated with polydimethylsiloxane) ~~Insecticide (1,1,1-trichloroethene carrier)~~ Insulating oil (inhibited, non-polychlorinated biphenyl)	Canned spray paint Paint thinner Safety fuses Contact Cleaner 2000 (precision aerosol cleaner) WD-40 ZEP (safety solvent) ABC fire extinguisher Air tool oil Mastic coating

The operation and maintenance phase of the proposed project would also require the transportation and use of smaller quantities of these same hazardous materials. The applicant has indicated that storage or use of large quantities of any of these materials would not be required within the proposed project's rights-of-way.

These hazardous materials, if stored on the rights-of-way in sufficient quantity during construction or operation, would necessitate the applicant or its construction and maintenance contractors to maintain a Hazardous Materials Business Plan (HMBP), which is required by California regulations. The HMBP would include an inventory and quantity of all hazardous materials used during construction, operation and maintenance. HMBPs and associated regulations are further discussed in Section 5.8.2.

~~Besides the insecticide, n~~ None of the hazardous materials listed in Table 5.8-1 are acutely hazardous. However, most are classified as toxic, flammable, or combustible. The transportation, storage, and use of these hazardous materials could result in potential human and environmental exposures through accidental spillage or release. The use, storage, transport, and disposal of hazardous materials used in construction, operation, and maintenance of the proposed project would require that the applicant handle the hazardous materials in accordance with federal, state, and county regulations. If insecticides or herbicides are required during construction or operation, the applicant must only use those that are registered with and approved by the U.S. Environmental Protection Agency (EPA).

The proposed project's pole removal and transmission line rerouting activities may also generate waste materials such as chemically treated wood, transformers, transformer oil, polychlorinated biphenyls (PCBs), asbestos ~~insulation~~-containing materials, and universal waste materials. Additionally, planned trenching activities could uncover contaminated soils and groundwater. These materials are designated by the Resource Conservation and Recovery Act (RCRA) or the state of California as hazardous waste, as would any spilled or discarded hazardous materials from Table 5.8-1.

Physical Hazards

Physical hazards along project utility corridors include fire, airport proximity, unexploded ordnance possibly associated with former Marine Camp CJ Miller at the Del Mar Fairgrounds and Racetrack, excavations, and objects that could induce current and voltage and result in electrical shock.

Hazardous Waste and Substances Sites

The applicant retained Environmental Data Resources, Inc. (EDR) to conduct a database analysis to determine the location of hazardous wastes and hazardous material release sites within one mile of all project components and work areas. This analysis involves database searches from local, state, and federal agencies with varying levels of enforcement related to the generation, storage and handling, transportation, and treatment of wastes, as well as emergency response activities and remediation of contaminated soil and groundwater sites. This EDR *DataMap Corridor Study* report (Appendix F) identifies 269 hazardous waste or hazardous material release sites within one mile of proposed project components and work areas (EDR 2016).

In addition to EDR's search, the California Public Utilities Commission (CPUC) has conducted searches of the State Water Resource Control Board's Geotracker database, Cease and Desist Orders, and Cleanup and Abatement Orders list; California Environmental Protection Agency's list of highly hazardous solid waste sites; and the California Department of Toxic Substance Control's (DTSC's) EnviroStor database of hazardous waste facilities and sites. These sources are often collectively referred to as the "Cortese List," and are listed in Government Code Section 65962.5. A search of the Cortese List databases found 10 sites within 0.25 miles of proposed project components (DTSC 2018; EDR 2016; SWRCB 2018). Further details about these sites are included in Table 5.8-2; the location of each of these sites is presented on Figure 5.8-1.

Table 5.8-2 Hazardous Materials and Potentially Contaminated Sites within 0.25 miles of Project

Name	Status/Site Type	Location	Distance from Project	Media/Contaminant
Del Mar Mobil Station	case closed (1992) LUST site	2750 Via De La Valle, Del Mar	100 ft. north TL6973	TPH contamination in soil and groundwater.
Rancho Car Wash	case closed (2010) LUST site	2661 Via De La Valle, Del Mar	400 ft. south TL6973	TPH contamination in soil and groundwater.
ARCO Station #1919/ PSI 704	case closed (2006) LUST site	660 Via De La Valle, Solana Beach	100 ft. west TL6973	TPH contamination in soil and groundwater.
Del Mar Texaco Station	case closed (2014) LUST site	2205 Via De La Valle, Del Mar	100 ft. north TL6973	TPH contamination in soil and groundwater.
Former Marine Camp C.J. Miller (on County Fairgrounds)	awaiting evaluation/ fmr. military base	2260 Jimmy Durante Blvd., Del Mar	adjacent TL666D	no record of contamination
Del Mar Thoroughbred Club (on County Fairgrounds)	case closed (2000) LUST site	2260 Jimmy Durante Blvd., Del Mar	500 ft. west TL666D	TPH contamination in soil and groundwater.
Agricultural Association – 22nd St District (on County Fairgrounds)	case closed (2000) LUST site	2260 Jimmy Durante Blvd, Del Mar	500 ft. NW TL666D	TPH contamination in soil.
San Dieguito Field / Del Mar Naval Auxiliary Air Facility Navy Dirigible Site	case closed (2012) fmr. military base	San Dieguitto Rd. (Palm Dr NE), Del Mar	adjacent TL666D	TPH contamination in surface, groundwater and unspecified solid waste material
Precision Engine Controls Corp.	case closed in 2017	11661 Sorrento Valley Rd, San Diego	300 ft. west of southern terminus, TL666D	Chlorinated Hydrocarbons (TCE & PCE) contamination in groundwater and soil
Kyocera America Inc.	case closed (1993) soil contamination	11620 Sorrento Valley Rd, San Diego	700 ft. SW of southern terminus, TL666D	TPH contamination in soil.

Sources: EDR 2016; DTSC 2018; SWRCB 2018.
Key:
Blvd. = Boulevard
Dr = Drive
ft. = feet
fmr. = former
LUST= Leaking Underground Storage Tank
mi.= miles
NE = northeast
NW = northwest
PCE= Tetrachloroethylene
Rd. = road
SW = southwest
TCE= Trichloroethylene
TPH = Total Petroleum Hydrocarbons

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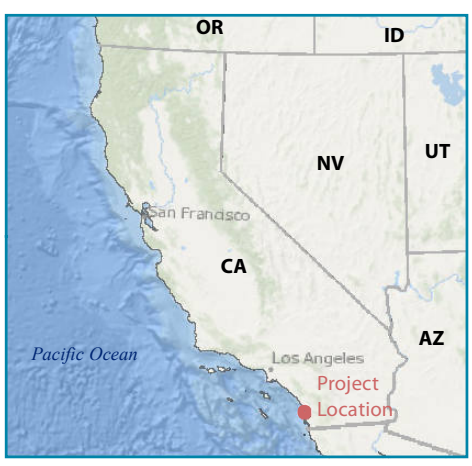
Via De La Valle
ARCO Station #1919/PSI704
Del Mar Mobil Station
Via De La Valle
Rancho Car Wash
Del Mar Texaco Station
DEL MAR FAIRGROUNDS
Del Mar Thoroughbred Club
Former Marine Camp C.J. Miller
Agricultural Association - 22nd District
El Camino Real
San Dieguito Dr
SAN DIEGUITO LAGOON
San Dieguito Field / Del Mar Naval
Del Mar Heights Rd
Mango Dr
5
Carmel Creek Rd
Carmel Country Rd
Carmel Canyon Rd
56
LOS PENASQUITOS LAGOON
Carmel Valley Rd
56
Torrey Pines Rd
TORREY PINES STATE NATURAL RESERVE
Sorrento Valley Rd
Precision Engine Controls Corporation
Kyocera America Incorporated
805

Sources: San Diego Gas and Electric (SDG&E) 2017; Earth Systems Research Institute (ESRI) 2017



Hazardous Sites

Proposed Project Components

C510 Conversion

C738 Conversion

TL666D Removal

TL674A Reconfiguration

Drop Zone

Fly Yard

Staging Yard

Stringing Site

Work Area

Existing Access Road

Existing Footpath

Existing Footpath/ATV Access

Temporary Footpath

Figure 5.8-1
Hazardous Sites in the Proposed Project Vicinity
TL 674A Reconfiguration and TL666D Removal
San Diego County, California
February 2018

N
0 0.25 0.5 Miles
0 0.5 1 Kilometers

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Schools

Two public and six private schools, preschools, or day care centers are located within 0.25 miles of the proposed project, as shown in Table 5.8-3. Six of the eight schools would be located within 500 feet of the proposed project.

Table 5.8-3 Schools within 0.25 Miles of the Proposed Project

School	Address	Approximate Distance
Fusion Academy Solana Beach	512 Via De La Valle #201, Solana Beach	1,250 ft. west of western terminus, TL674A Reconfiguration
Therapeutic ~~Literacy~~ Learning Center	990 Highland Dr., Solana Beach	100 ft. west of western terminus, TL674A Reconfiguration
Del Mar Hills Elementary School[(a)]	14085 Mango Dr., Del Mar	adjacent TL666 Removal
Del Mar Hills Nursery School	13692 Mango Dr., Del Mar	within 100 ft. west of TL666 Removal
Del Mar Heights Elementary School[(a)]	13555 Boquita Dr., Del Mar	400 ft. west of TL666 Removal
Torrey Pines Montessori Preschool	2586 Carmel Valley Rd., Del Mar	within 100 ft. west of TL666 Removal
Brighter Future Preschool and Childhood Development Center	3422 Tripp Ct, San Diego	300 ft. southwest of TL666 Removal
After School Learning Tree	11525 Sorrento Valley Rd. #A, San Diego	1,000 ft. south of southern terminus, TL666D Removal

Sources: SanGIS 2016; Google 2018; Great Schools 2018
Note:
[(a)] Public Schools
Key:
Dr. = Drive
Rd. = Road

Emergency Evacuation Routes

The San Diego County and State of California Offices of Emergency Services and the Federal Emergency Management Agency use hazard mitigation plans and area emergency plans to help prepare for situations that require emergency response. Based on the Unified San Diego County Emergency Services Organization, Operational Area Emergency Plan, Evacuation Annex Q, Interstate 5 (I-5), which is located in the project area, is a designated evacuation route (County of San Diego Office of Emergency Services 2014). The TL674 portion of the proposed project would include the installation of a new 69-kilovolt (kV) underground power line along Villa De La Valle where the road passes under an I-5 overpass and crosses I-5 on-ramps and off-ramps. The TL666D portion of the proposed project would include the removal of an existing 69-kV overhead power line, which currently crosses I-5 at a location 0.75 miles north of the Interstate 805 and I-5 junction.

Airports

The proposed project would not be located near any private or public airstrip. The closest private airstrip is the Marine Corps Air Station at Miramar, which is located 5 miles southeast of the southern terminus of TL666D portion of the proposed project. The nearest public airport is the Montgomery-Gibbs Executive Airport, which is located approximately 8 miles southeast of the southern terminus of TL666D portion of the proposed project. Torrey Pines Corporate Helistop Heliport, a private heliport, is located approximately 0.6 miles southwest of the southern terminus of TL666D portion of the proposed project (SanGIS 2016; Airport-Data.com 2018).

Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) identifies and maps areas of significant fire hazard based on fuels, terrain, weather, and other relevant factors (CAL FIRE 2009a). CAL FIRE maps indicate that the project area is within a Local Responsibility Area, meaning local government is responsible for wildland fire protection. The City of San Diego Fire Department is responsible for most of the Local Responsibility Areas overlapping the proposed project area. The City of Del Mar is responsible for responding to fires within portions of the project area in the City of Del Mar. Most of the project area is designated Very High Fire Hazard Severity Zone, denoting a high susceptibility to wildland fire (City of San Diego 2009; CAL FIRE 2009b). The locations of these Very High Fire Hazard Severity Zones are presented in Figure 5.8-2. Fire protection services and equipment near the project alignment are discussed in detail in Section 5.14, "Public Services."

5.8.2 Regulatory Setting

Federal

Resource Conservation and Recovery Act

The RCRA regulates hazardous waste during all phases, from generation, to storage and transport, to treatment and final disposal. The EPA authorizes the California DTSC to administer the state's RCRA programs. A RCRA hazardous waste exhibits at least one of four characteristics: ignitability (the ability to catch fire), corrosivity (ability to cause rust or destruction of a substance by chemical action), reactivity (ability to initiate an unstable and violent chemical change), or toxicity (ability to damage an organism). To keep track of hazardous waste activities, owners and operators of hazardous waste facilities must keep certain records and submit reports to the EPA at regular intervals. All facilities that generate, transport, recycle, treat, store, or dispose of hazardous waste are required to notify the EPA (or its state agency) of its hazardous waste activities. Any facility generating hazardous waste must obtain an EPA Identification Number unless the waste has been excluded or exempted from regulation. National Biennial RCRA Hazardous Waste Reports Sections 3002 and 3004 require that the EPA collect hazardous waste management information every two years from facilities that generate, treat, store, or dispose of hazardous waste. Used hazardous waste that would be generated from construction and operation of the proposed project is regulated under this act.

Hazardous Materials Transportation Act

The primary objective of the Hazardous Materials Transportation Act is to provide adequate protection against risks to life and property inherent in the transportation of hazardous materials in commerce. This act empowers the U.S. Department of Transportation to regulate the transportation of hazardous materials by rail, aircraft, vessel, or public highway. Hazardous materials regulations are subdivided by function into the following four areas within 49 Code of Federal Regulations (CFR) Parts 101, 106, 107, 171 to 177, and 178 to 180: Procedures and/or Policies, Material Designations, Packaging Requirements, and Operational Rules. The transportation of all hazardous materials to and from the project area during both construction and operation and maintenance would be regulated by this act.

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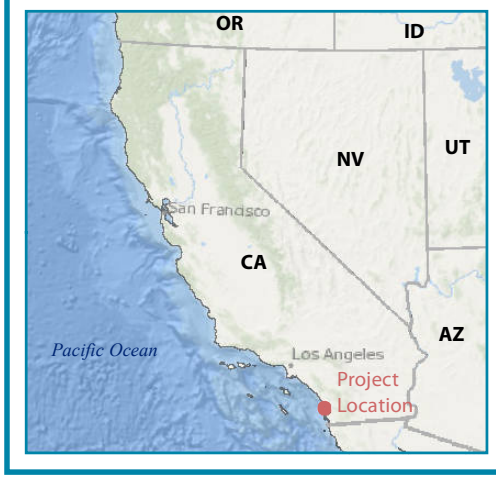
Via De La Valle
San Dieguito Dr
El Camino Real
Del Mar Heights Rd
Carmel Country Rd
Carmel Canyon Rd
Mango Dr
5
Carmel Creek Rd
56
Carmel Valley Rd
Torrey Pines Rd
Sorrento Valley Rd
805

Sources: San Diego Gas and Electric (SDG&E) 2017;
Earth Systems Research Institute (ESRI) 2017



Proposed Project Components
- C510 Conversion
- C738 Conversion
- TL666D Removal
- TL674A Reconfiguration
- Drop Zone
- Fly Yard
- Staging Yard
- Stringing Site
- Work Area
- Existing Access Road

- Existing Footpath
- Existing Footpath/ATV Access
- Temporary Footpath

Fire Hazard Severity Zones
- Moderate
- High
- Very High
- Less than Very High severity, but no specific severity zone data has been adopted
- State Responsibility Area

*Unless noted all areas are Local Responsibility Areas

Figure 5.8-2
Fire Severity Zone around the Proposed Project Vicinity TL 674A Reconfiguration and TL666D Removal
San Diego County, California
February 2018

0 0.25 0.5 Miles
N
0 0.5 1 Kilometers

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Oil Pollution Prevention

The objective of the oil pollution prevention regulation stated in 40 CFR Part 112 is to prevent oil discharges from reaching navigable waters of the United States or adjoining shorelines. This regulation was also written to ensure effective response to oil discharge. The regulation further requires that proactive measures be used to prevent oil discharge through two specific requirements: the Spill Prevention, Control, and Countermeasure [SPCC] rule and the Facility Response Plan requirement. A facility is subject to SPCC regulations if the capacity of any single oil tank were greater than 660 gallons; total oil storage capacity exceeded 1,320 gallons above ground or 42,000 gallons underground, and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the "Navigable Waters" of the United States. The project would not be subject to the Facility Response Plan requirement.

Occupational Safety and Health Standards

The Occupational Safety and Health Standards (OSHA) (CFR Title 29) are regulations for safety in the workplace and during construction, including safety regarding the use of helicopters during construction. OSHA standards require implementation of a Hazard Communication Plan to identify and inventory all hazardous materials and organize material safety data sheets. OSHA's standards also require employee training in safe handling of hazardous materials. OSHA standards are relevant to the proposed project because its construction and operation would involve the use of vehicles that may pose health and safety risks to workers. In addition, workers would handle and apply hazardous chemical substances during construction and, to a lesser extent, during project operation and maintenance.

State

Hazardous Materials and Waste

California HSC Section 25501 defines a hazardous material as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment. CCR Title 8, Section 339 lists substances identified as hazardous for which employers must provide material safety data sheets to employees.

CCR Title 22, Section 66261.1 identifies wastes that are subject to regulation as hazardous wastes and that are subject to the notification requirements pursuant to the California HSC. The HSC defines a waste as hazardous if it has any of the following characteristics: ignitability, corrosively, reactivity, and/or toxicity. It also defines hazardous wastes listed pursuant to RCRA, non-RCRA hazardous wastes, hazardous wastes from specific sources, extremely hazardous wastes, hazardous wastes of concern, and special wastes. The EPA has authorized the California DTSC to administer the RCRA program in California.

Under federal regulations, transformer oil, under most intended uses, would become used oil, the recycling of which is regulated by 40 CFR 279. Use resulting in chemical or physical change or contamination may also be subject to used oil regulation as a hazardous waste, which is also managed under 40 CFR 279. In California, however, all used oil is managed as hazardous waste until tests have shown that it is not hazardous (HSC Section 25250.4). Requirements for the transport of hazardous waste,

including driver training, are established in CCR Title 26 and would be applicable during any project-related activities that would involve transporting untested used oil.

Certified Unified Program Agency and Hazardous Materials Plans

Administration of the Certified Unified Program Agency (CUPA) is authorized by the California HSC (Chapter 6.11, Sections 25404-25404.8) and CCR Title 27, Division 1, Subdivision 4, Chapter 1, Sections 15100–15620. This program is implemented at the local level by government agencies certified by the secretary of the California EPA. The San Diego Department of Environmental Health's Hazardous Materials Division (HMD) is the CUPA for the project area.

Hazardous Materials Release Response Plans and Inventory Act of 1985

The Hazardous Materials Release Response Plans and Inventory Act, also known as the Business Plan Act, requires businesses using hazardous materials to prepare a plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials regulated under the Business Plan Act include all hazardous materials that are stored or used at a facility.

California HSC Section 25503.5 requires that facilities that store hazardous materials in excess of 55 gallons (liquid), 500 pounds (solid), or 200 cubic feet (gas) prepare an emergency response business plan. Facilities that handle more than these indicated quantities of hazardous materials must submit an HMBP to the CUPA prior to ~~project construction~~ hazardous materials being brought on site. In general, HMBPs describe and identify storage areas for hazardous materials and waste; describe appropriate handling, storage, and disposal techniques; and include measures for avoiding and addressing spills pursuant to California HSC Section 25504. The applicant would be required to submit an HMBP to the CUPA for both construction and operation phases of the proposed project.

Furthermore, California HSC Section 25510.3 requires notification to the school superintendent of any release of hazardous material that requires an emergency response to schools with 0.5 miles of the release.

Treated Wood Waste

Section 25150.7 of the California HSC outlines procedures and regulations for the management and disposal of treated wood waste. Wood waste, including the type of wood utility poles that would be disposed of as part of the proposed project, may be treated with ~~pesticides~~ insecticides or other chemicals. ~~Because the chemical treatments could leach into water supplies after the disposal of the wood,~~ Section 25150.7 was developed to restrict how and where treated wood waste can be disposed of.

Hazardous Waste Control Act

The Hazardous Waste Control Act established the state hazardous waste management program, which is similar to, but more stringent than, RCRA program requirements. CCR Title 26 describes the requirements for the proper management of hazardous waste under the Hazardous Waste Control Act, including the following:

- Identification and classification;
- Generation and transportation;

- Design and permitting of recycling, treatment, storage, and disposal facilities;
- Treatment standards;
- Operation of facilities and staff training; and
- Closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for the identification, packaging, and disposal of such waste. Under the Hazardous Waste Control Act, and Title 26, the generator of hazardous waste must document waste from generation to disposal. Copies of this documentation must be filed with the California DTSC.

The California DTSC operates programs to protect California from exposure to hazardous wastes through the following practices and procedures:

- Handling of the aftermath of improper hazardous waste management by overseeing site cleanup;
- Prevention of the release of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly;
- Enforcement against those who fail to appropriately manage hazardous wastes;
- Exploration and promotion of measures to prevent pollution and encourage reuse and recycling;
- Evaluation of site-specific soil, water, and air samples and development of new analytical methods;
- Practice in other environmental sciences, including toxicology, risk assessment, and technology development; and
- Involvement of the public in the California DTSC's decision-making.

Hazardous wastes that may be encountered or generated during the construction and operation of the proposed project would be subject to the requirements defined by the Hazardous Waste Control Act.

Government Code Section 65962.5: Cortese List

The Cortese List includes all hazardous waste facilities subject to corrective action; land designated as hazardous waste property or border zone property; information received from the California DTSC about hazardous waste disposals on public land; sites listed pursuant to the California HSC Section 25356 (removal and remedial action sites); and sites included in the Abandoned Site Assessment Program. Pursuant to Government Code Section 65962.5, the California DTSC compiles and updates the Cortese List as appropriate, but at least annually. See Table 5.8-2 for a description of Cortese List hazardous materials and potentially contaminated sites within 0.25 miles of the project components.

California Occupational Health and Safety Administration

The California Occupational Health and Safety Administration (CalOSHA) is responsible for the development and enforcement of workplace safety standards and ensuring worker safety in the handling

and use of hazardous materials. Similar to the federal OSHA, CalOSHA promulgates requirements to prevent worker exposure to certain types of hazardous substances in the workplace.

CalOSHA requires businesses to prepare Injury and Illness Prevention Plans and Chemical Hygiene Plans. Its Hazards Communication Standard requires that workers be informed of the hazards associated with the materials they handle. Manufacturers are required to label containers and provide material safety data sheets and training to workers. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337–340). The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

Underground Service Alert (DigAlert)

California Government Code 4216 et seq. defines mandatory notification procedures for subsurface excavations and installations. Pursuant to Section 4216 et seq., the applicant must contact the Underground Service Alert of Southern California, also known as DigAlert, at least two working days but no more than 14 days prior to conducting excavation activities for any proposed project component, during both project construction and operation phases (DigAlert 2018).

Local

CPUC General Order 131-D, Section XIV.B

CPUC General Order 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 electrical facilities constructed by public utilities subject to the Commission's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters."

San Diego County Department of Environmental Health Hazardous Materials Division

The San Diego Department of Environmental Health's HMD is the CUPA for the project area. The goal of the HMD is to protect human health and the environment by ensuring that hazardous materials, hazardous waste, medical waste, and underground storage tanks are properly managed. As the CUPA, the HMD regulates facilities that handle or store hazardous materials or generate or treat hazardous wastes. The HMD also manages the Emergency Response, Aboveground Petroleum Storage, and Underground Storage Tank programs (HMD 2018).

San Diego County Fire Code and the 2017 County of San Diego Consolidated Fire Code

The County of San Diego has adopted fire codes that are more stringent than the state fire code. The San Diego Fire Code addresses brush clearance, access roads, emergency access, maintenance of vacant property, blasting, hazardous fire areas, use of spark arresters, open-flame equipment, and use of fire roads and firebreaks. The County of San Diego Consolidated Fire Code is based on the County Fire Code and has been adopted by San Diego County Fire Authority districts.

San Diego County Code of Regulatory Ordinances

Ordinances regarding hazardous material and hazardous waste are addressed in Title 6, Division 8, Chapter 11 of the San Diego County Code of Regulatory Ordinances. These ordinances address hazardous and medical wastes, underground storage of hazardous substances, hazardous materials inventory and response plans, hazardous waste establishments (CUPA), and additional locally required information on hazardous compressed gases, carcinogens, and reproductive toxins.

County of San Diego Operational Area Emergency Operations Plan

The County of San Diego Operational Area Emergency Operations Plan describes the emergency management system within San Diego County and all jurisdictions within San Diego County. It provides for a planned response to any emergency associated with natural disasters, technological or nuclear incidents, or terrorism. It delineates operational concepts relating to various emergencies, identifies components of a comprehensive emergency management system, and describes responsibilities for protecting life and property and assuring the overall wellbeing of the population. The emergency operation plan has 16 annexes which address components of the plan. Annex Q addresses evacuation and evacuation routes (County of San Diego Office of Emergency Services 2014).

San Diego Air Pollution Control District

The SDAPCD enforces rules and regulations based on air pollution laws, educates businesses and residents about their roles in protecting air quality, and implements air quality programs required by state and federal mandates, such as the asbestos program. Asbestos is a Toxic Air Contaminant (as defined by Title 17, California Code of Regulation, § 93000) and is used to manufacture transmission poles and conductor. The SDAPCD regulates asbestos-containing materials from demolition and renovations of regulated facilities. An asbestos notification form is required for any regulated demolition, whether or not asbestos is present, and for certain regulated renovations. A Demolition Permit Release form is typically required for all demolitions, including for facilities exempt from the National Emission Standards for Hazardous Air Pollutants (DTSC 2006; SDAPCD 2018).

City of Del Mar Community Plan

The community plan for the city of Del Mar does not specifically address hazards in its environmental section. The environmental section does address the protection of San Dieguito Lagoon and the flood hazards associated with the San Dieguito Floodplain, across which the existing TL666D power line extends. The community plan lists policies and recommendations intended to minimize land uses that could threaten water quality and reduce the quantity and duration of pollutant discharge and runoff, which could occur during construction of the proposed project (City of Del Mar 1976).

City of Del Mar Municipal Code

The City of Del Mar Municipal Code addresses fire codes and hazardous wastes, and guides the implementation of the San Diego County Hazardous Waste Management Plan within the city of Del Mar.

City of San Diego General Plan

The Public Facilities, Services, and Safety Element of the City of San Diego General Plan outlines several goals related to hazards. The plan describes Disaster Preparedness Goals with respect to planning, relief services, and restoration following disaster events, as well as Fire-Rescue Goals for life, property, and the environment in the event of a fire (City of San Diego 2015).

City of San Diego Community Plans

The communities of Torrey Pines, Torrey Hills, and Via De La Valle have published community plans with policies that are relevant to the proposed project. The Torrey Pines Community Plan states that all development within Torrey Pines must comply with the Uniform Fire Code and Section 6 (Brush Management) of the City of San Diego's Landscape Technical Manual. In summary, these codes state that brush or native vegetative growth on steep slopes must be controlled to protect existing and proposed structures from fire hazards (City of San Diego 2014a). The Torrey Hill Community Plan encourages the use of design features that promote fire protection, such as fire-resistant building materials and landscaping (City of San Diego 2014b). The Via De La Valle Community Plan does not list goals or policies related to hazards.

City of San Diego Municipal Code

Chapter 5, Article 5 of the City of San Diego Municipal Code outlines fire and hazardous materials codes. Chapter 4, Article 2 Divisions 8 and 9 address hazardous waste and hazardous materials disclosure requirements. The Municipal Code also describes a Brush Management Program to be maintained in accordance with the City of San Diego's Landscape Technical Manual. Section 6 of the Brush Management Program requires the control of native vegetative growth on steep slopes to protect structures from fire hazards.

5.8.3 Environmental Impacts and Assessment

Applicant Proposed Measures

The applicant has not incorporated any formal applicant-proposed measures (APMs) into the proposed project that would minimize or avoid impacts from hazards or hazardous materials. However, the applicant would adhere to best management practices (BMPs) related to hazardous materials outlined in the applicant's *Water Quality Construction BMP Manual* (Appendix F), and BMP for wildland fire hazards as addressed in Operations and Maintenance Wildland Fire Prevention Plan (Appendix F). Additionally, the applicant has agreed to implement APM TRA-01 to coordinate with emergency service providers related to the potential for and scheduling of lane or roadway closures that during construction that could affect emergency service provider access and circulation on the local street network. See Section 5.16, "Traffic and Transportation" for additional information.

Significance Criteria

Table 5.8-4 includes the significance criteria from Appendix G of the CEQA Guidelines for hazards and hazardous materials. This checklist is used to evaluate the environmental impacts of the proposed project related to hazards and hazardous materials.

Table 5.8-4 Hazards and Hazardous Materials Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h. 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?	☐	☐	☒	☐

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

Small amounts of the hazardous materials listed in Table 5.8-1 would be used, transported, and stored in the project area during the proposed project's 12-month construction period. Refueling of equipment and vehicles would take place at staging areas or fly yards. The proposed pole removal and transmission line rerouting activities may generate hazardous waste materials such as chemically treated wood, petroleum-

based transformer oil, PCB-contaminated materials, and asbestos-containing materials. Additionally, soil excavation would be required during trenching and the installation of duct banks, vaults, poles, and guard structures. These activities could uncover contaminated soils and groundwater. Materials that are excavated, transported, stored, or disposed of during construction of the proposed project have the potential to contain hazardous compounds and could present a hazard to construction workers, the public, or the environment if improperly managed.

According to the applicant, management practices documented in the applicant's *Water Quality Construction BMP Manual* (BMP Manual; Appendix F) would be implemented during construction to reduce potential impacts from hazardous materials. Practices include the following:

- All non-hazardous materials encountered during excavation activities would be transported to a landfill;
- Contaminated soil and hazardous materials, if encountered, would be transported to an appropriately permitted, approved disposal facility;
- All spills would be immediately cleaned up and disposed of in accordance with the applicant's BMP Manual;
- Uncontaminated groundwater encountered during excavation activities would be handled following procedures described in the BMP Manual;
- Contaminated and potentially contaminated groundwater, if encountered during excavations, would be handled by a qualified field environmental representative; and
- A Safety and Environmental Awareness Program would be developed and implemented, which will include training on hazardous material protocols and BMPs.

In addition to implementing BMPs, the applicant would comply with all applicable regulations pertaining to the management of hazardous materials and hazardous wastes. For example, removal or relocation of utility lines with components suspected to contain asbestos may require~~s~~ notification to the SDAPCD, an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal Regulations 61, Subpart M). With adherence to applicable laws and regulations, implementation of the applicant's BMP Manual, and Safety and Environmental Awareness Program training, impacts resulting from the routine transport, use, or disposal of hazardous materials would be reduced, but these adherences are not comprehensive enough to mitigate all potential impacts.

San Diego Gas & Electric Company (SDG&E) or its contractors would remove an oil circuit breaker from the Del Mar Substation and take it to an existing yard. As applicable, parts would be separated to serve as emergency replacement components for other equipment currently in service. The remaining parts would then be sent to a local contracted metal scrap company for disposal. SDG&E's best management practices would be implemented, as applicable, during this work phase.

To reduce this impact to less than significant, the applicant shall implement **MM HAZ-1**, which would require the applicant develop and implement a Hazardous Materials and Waste Management Plan and Emergency Spill and Evacuation Training for those working onsite/in the field on the proposed project. This plan would require training of construction crews in safe handling of hazardous materials prior to the initiation of construction activities and include the documentation of all relevant hazardous materials and waste management protocols and BMPs. **MM HAZ-1** would require the testing of any soils suspected of contamination.

MM HAZ-1: Hazardous Materials Waste Management Plan / Emergency Spill and Evacuation Training. Prior to construction, the applicant shall prepare a Hazardous Materials and Waste Management Plan, which shall be implemented during construction to prevent the release of hazardous materials and hazardous waste. The plan shall include the following requirements and procedures:

1. The Worker Training Program (see **MM BR-3**) would include training requirements for construction workers such as ~~in~~ appropriate work practices~~, including~~ and spill prevention and response measures. Additional training for those performing excavation activities shall be required and shall include training on types of contamination and contaminants (e.g., petroleum hydrocarbons, asbestos, and hazardous materials as defined by the California HSC) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). Training would also entail safe evacuation, which could be required due to an unanticipated major spill or other emergencies such as fires and/or natural disasters that could occur within the project area. Training would describe the means by which employees would safely vacate the affected work site and specified, approved evacuation route(s) in case of emergency. This training may be carried out as a stand-alone training module or in conjunction with the training required in **MM BR-3**.
2. Containment of all hazardous materials at work sites and properly dispose of all such materials.
    a. Hazardous materials shall be stored on pallets within fenced and secured areas and protected from exposure to weather and further contamination.
    b. Fuels and lubricants shall be stored only at designated staging areas.
3. Maintenance of hazardous material spill kits for small spills at all active work sites and staging areas. Thoroughly clean all spills as soon as they occur. If an accidental spill or fluid leak occurs at any time during project construction, including in locations within 50 feet of aquatic resources in unanticipated circumstances such as equipment malfunction, secondary containment strategies may be utilized to contain the spill.
4. Storing sorbent and barrier materials at all construction staging areas, including staging areas used during activities for decommissioning. Sorbent and barrier materials will be used to contain runoff from contaminated areas and from accidental releases of oil or other potentially hazardous materials.
5. Performing all routine equipment maintenance at a shop or at the staging area and recovering and disposing of wastes in an appropriate manner.
6. Monitoring and removal of vehicles used for construction-related activities with chronic or continuous leaks from use and complete repairs before returning them to operation.

7. Storing shovels and drums at the staging areas. If small quantities of soil become contaminated, use shovels to collect the soil and store in drums before proper offsite disposal. Large quantities of contaminated soil may be collected using heavy equipment and stored in drums or other suitable containers prior to disposal. Should contamination occur adjacent to staging areas because of runoff, shovels and/or heavy equipment shall be used to collect the contaminated material. Only trained construction workers shall handle hazardous, and potentially hazardous, materials.
8. Transporting, shipping, and disposal procedures for hazardous waste.
9. Identification of a qualified field environmental representative for the proposed project for management of hazardous materials, hazardous wastes, contaminated soil, and contaminated groundwater.
10. Procedures for notifying applicant and agency personnel in the event of discovery of contaminated soil and/or groundwater. Contact information for federal, regional, and local agencies; the applicant's field environmental representative and environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater; and licensed disposal facilities and haulers.

    This plan shall be submitted to the CPUC for review and approval at least 30 days prior to the start of project construction.

The majority of the chemicals used for operation and maintenance activities would be similar to those used during the construction phase, and the daily use of such chemicals would generally be considerably less during operation and maintenance activities relative to construction activities. Through implementation of **MM HAZ-1**, potential impacts associated with hazardous materials management would be reduced to less than significant.

Significance: Less than Significant with Mitigation Incorporation

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?

As discussed under impact criterion (a), the applicant would transport, use, or dispose of hazardous materials and petroleum products in accordance with the applicant's BMPs and all applicable federal, state, and local regulations. Accidental releases or spills could still occur, representing a potential hazard to the public and environment during construction and could be a significant impact. Compliance with **MM HAZ-1** would reduce impacts to a less than significant level.

Other potential hazards associated with proposed project include the presence of high voltage, open-air conductors that can create a high-temperature electrical arc between the electrical conductor and persons or objects. Prior to removing existing conductor and installing new overhead conductor, SDG&E would install temporary guard structures at road crossings and other locations where the existing or new conductor could come in contact with existing electrical and communication facilities, or with vehicular and/or pedestrian traffic if the line were to accidentally fall during stringing operations. Further, the applicant's power lines possess grounding devices, and, in the event of a lightning strike on a power line,

the strike would be discharged to appropriate ground. However, impacts would be significant if workers were not informed of proper safety procedures. All workers would be trained in appropriate safety procedures, as described in **MM HAZ-1** and impacts to construction crew and the environment relating to accidental release or exposure to hazardous materials would be less than significant with implementation of **MM HAZ-1**.

Accidental contact with existing underground utility lines or a private utility line, such as a leach line associated with a septic system, could release waste materials and pose a safety risk for the public and workers. Compliance with California Government Code 4216.1 would reduce potential impacts to public utility lines because underground utilities would be identified and marked prior to construction so that they could be avoided. The potential for the proposed project to damage existing underground infrastructure would be less than significant.

After the removal of approximately 6 miles of existing overhead conductor associated with the TL666D, removal of TL674A and its reconfiguration, and the conversion of C510 and C738, operation and maintenance requirements in the project area would be reduced. Moreover, new project components would be installed in areas where similar operation and maintenance activities already occur. Therefore, no new or additional impacts relating to hazards are anticipated from the project's operation and maintenance activities. The majority of the chemicals used for operation and maintenance activities would be similar to those used during the construction phase, and the daily use of such chemicals would generally be considerably less during operation and maintenance activities relative to construction activities. Consequently, the less frequent use of hazardous materials within the project alignment would result in much lower likelihood of a significant upset or accident. Therefore, no new or significant impacts would result from reasonably foreseeable upset or accident conditions during operation and maintenance of the proposed project.

Significance: Less than Significant with Mitigation Incorporation

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?

Schools within 0.25 miles of the proposed project are considered sensitive receptors. As previously discussed, two public and six private schools, preschools, and day care centers were identified within 0.25 miles of the proposed project (Table 5.8-3). Six of the eight schools would be located within 500 feet of project work areas. As discussed under impact criteria (a) and (b), the impacts associated with the proposed project's materials, substances, or waste would be less than significant with the implementation of applicant-proposed BMPs, **MM-HAZ-1**, and compliance with applicable hazardous material regulations. Due to the temporary and short-term nature of construction and the relatively small quantity of hazardous materials to be used and stored during construction, impacts to schools from potential hazardous substance releases or emissions would be less than significant with mitigation.

After the removal of TL666D, operation and maintenance requirements in the project area would be reduced when compared to operation and maintenance requirements on the existing overhead utility infrastructure lines and new project components would be installed in areas where similar maintenance activities already occur. The majority of the chemicals used for operation and maintenance activities would be similar to those used during the construction phase, and the daily use of such chemicals would generally be considerably less during operation and maintenance activities relative to construction activities. Consequently, the less frequent use of hazardous materials within proposed project alignment would result in much lower likelihood of a significant upset or accident. The applicant also has BMPs for hazardous materials release responses, which comply with federal, state, and local regulations for any release of hazardous materials. The compliance with **MM-HAZ-1**, BMPs and regulations would additionally render any hazardous materials upset or accident less than significant.

Significance: Less than Significant with Mitigation Incorporation

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

The project components and work areas would not overlay any areas included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Ten hazardous-materials-contaminated sites are located within 0.25 miles of the project area, described in Table 5.8-2.

The closest hazardous material sites to the excavation area are four leaking underground storage tank sites located within 100 feet of the proposed project. Since the soil and groundwater at these sites are contaminated with petroleum hydrocarbons, the potential exists for contaminants to migrate to the project area. Ground-disturbing activities associated with trenching for the proposed project could potentially uncover and release petroleum-hydrocarbon-contaminated soil and groundwater, which would be a significant impact. As indicated previously, **MM HAZ-1** would require the applicant to prepare and implement a Hazardous Materials Management Plan to ensure that specific actions and protocols regarding contaminated soil and groundwater are established. Through implementation of **MM HAZ-1**, potential impacts associated with undiscovered soil contamination would be less than significant.

No project operation and maintenance areas would be located on areas included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. There are four contaminated sites within 0.25 miles of the proposed project's operation and maintenance areas (i.e., component TL6973). However, operation and maintenance activities for the proposed project would not typically involve new areas of ground disturbance. Since the four closest sites are all underground, it is unlikely that routine operation and maintenance activities would result in contact with these contaminated sites. Therefore, there would be no impact from operation and maintenance under this criterion.

Significance: Less than Significant with Mitigation Incorporation

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 for people residing or working in the project area?

The proposed project would not be located within 2 miles of a public airport, and thus would not affect or disrupt existing operations or worker safety at such a facility.

Significance: No Impact

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The proposed project would not be located within 2 miles of a private airstrip. However, the TL666D component of the proposed project would be located 0.6 miles from a private heliport. The project would not affect or disrupt existing operations or worker safety at such a facility. Therefore, no impact would occur.

Significance: No Impact

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

I-5, a county-designated evacuation route, is located in the project area. A new 69-kV underground power line would be installed along Villa De La Valle where the road passes under an I-5 overpass. The new line would also be installed across two I-5 on-ramps and one I-5 off-ramp. In addition, the proposed project would involve the removal of an existing 69-kV overhead power line, which currently crosses I-5 0.75 miles north of the Interstate 805 and I-5 junction. Activities along Villa De La Valle would require temporary lane closures, which could interfere with entrance and exits to I-5 at Villa De La Valle. The removal activities associated with the 69-kV line could require temporary I-5 lane closures and could impact the I-5 evacuation route.

Portions of the TL674A reconfiguration, TL666D removal, and C510 conversion activities would be conducted within public roadways and would cross public roadways. Temporary lane and road closures may be required in locations where the proposed project would span or be adjacent to public roadways. Some lanes or roads may be temporarily limited to one-way traffic at times, and one-way traffic controls would be implemented as required.

A Del Mar Fire Department fire station is located on Jimmy Durante Boulevard at the Del Mar fairgrounds. This fire station is situated adjacent to the project's TL666D component where the removal of a 69-kV line would potentially require a road closure or work along road shoulders that could temporarily affect normal roadway operations. A road closure on Jimmy Durante Boulevard could impair the fire department's ability to respond to an emergency.

To address the potential for road closures and obstructions to emergency vehicle circulation, SDG&E has agreed to implement **APM TRA-01**. At least 30 days prior to construction of the proposed project, SDG&E would coordinate with the Del Mar Fire Department and the San Diego County Sherriff's Department to inform them of the planned lane closures along Jimmy Durante Boulevard and to minimize

potential disruptions to emergency vehicle response times. Coordination with emergency service providers would inform the likely period of construction and develop protocols to reduce potential conflicts between construction vehicles and emergency vehicles accessing affected roadways.

Moreover, all lane and road closures, and road encroachments would also require SDG&E to apply for permits from and submit traffic management plans to the appropriate agencies. Permits could require crews to work along certain portions of roadway (i.e., Via de la Valle) during certain hours, or to stage machinery and equipment in such a manner as to retain access and maintain traffic flow to extent feasible during construction. Road closures and encroachment into public roadways, including I-5, could impair implementation or interfere with adopted emergency response or emergency evacuation plans. However, SDG&E would be required to obtain an encroachment permit and road crossing approvals for the work and implement permit conditions, which may include special guard structure procedures, traffic control, netting, as directed by the California Department of Transportation. Based on the temporary nature of project construction and the requirement to implement traffic control measures as conditioned in required encroachment permits, the proposed project would not conflict with emergency evacuation or response plans. As a result, potential impacts during construction would be less than significant.

Operation and maintenance activities for the proposed project would be conducted in the same manner as they were prior to construction. The removal of overhead transmission lines over and along Jimmy Durante Boulevard and over I-5 would eliminate all future operation and maintenance activities associated with those transmission lines. Since there would be no operation and maintenance activities on Jimmy Durante Boulevard or over I-5, there would be no road or lane closures. The new underground transmission lines that cross I-5 on and off-ramps would require little maintenance and no road closures. Since there would be no road or lane closures associated with I-5 or Jimmy Durante Boulevard during operation and maintenance activities, the proposed project would not conflict with emergency evacuation or response plans. As a result, there are no impacts associated with operation and maintenance of the proposed project under this criterion.

Significance: Less than Significant

h. Would the 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?

The majority of the proposed project would be located within Very High Fire Hazard Severity Zones. Construction activities could pose fire risk due to the increased presence of vehicles, equipment using combustible engines, and human activity. A construction-caused fire could spread to residential or wildland areas near the project alignment, creating a significant risk of property loss and injury or death. The risk of such a wildfire would be a significant impact.

No APMs are proposed to minimize or avoid impacts from wildland fires caused by the proposed project because the applicant has committed to implementing its existing *Operations and Maintenance Wildland Fire Prevention Plan*, which is in Appendix F. The plan requires the assessment of work areas for wildland fire risk and reduction of fire hazards inside and around the perimeter of each work area when possible. The plan prohibits vehicles and equipment from being staged or parked on vegetation.

Vegetation identified as a fire hazard would be cleared and removed or chipped and spread on site. Cleared vegetation would be disposed of in accordance with instructions from applicable jurisdictional agencies and/or landowners. Additionally, the applicant would comply with San Diego fire codes, which require specific actions to mitigate the potential for a wildland fire. Through compliance with fire code requirements and implementation of existing plans, the potential impacts associated with wildland fire would be less than significant during construction.

The proposed project would require the removal of approximately 6 miles of existing 69-kV overhead power lines, and the removal of approximately 0.85 miles of existing 12-kV overhead power lines, which would eliminate all future operation and maintenance activities and fire risk associated with these overhead transmission lines. In addition, the applicant would implement its *Operations and Maintenance Wildland Fire Prevention Plan* and comply with all applicable fire codes during the operation and maintenance phase. With the removal of existing overhead transmission lines, the reduction in flammable materials, the adherence to a wildland fire plan, and compliance with fire codes, the potential for wildland fire from the operation and maintenance of the proposed project would be reduced, and no new impacts would occur. Therefore, operation and maintenance of the proposed project would result in no impact under this criterion.

Significance: Less than Significant

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