

TABLE OF CONTENTS

4.8 HAZARDS AND HAZARDOUS MATERIALS.....4.8-1

4.8.1 Introduction4.8-1

4.8.2 Regulatory Setting4.8-2

4.8.3 Existing Conditions4.8-6

4.8.4 Applicant Proposed Measures4.8-11

4.8.5 Potential Impacts4.8-11

4.8.6 References4.8-14

LIST OF FIGURES

4.8-1 Regional Fire Threat Zones4.8-9

LIST OF APPENDICES

- 4.8-A GeoTracker and Envirostor Database Search Results
- 4.8-B Construction Fire Prevention Plan

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4.8 HAZARDS AND HAZARDOUS MATERIALS

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.8.1 Introduction

This section of the PEA describes the existing conditions and potential project-related impacts to hazards and hazardous materials in the vicinity of the Proposed Project. The analysis concludes that less than significant impacts related to hazards and hazardous materials will occur. The Proposed Project’s potential effects on this resource were evaluated using the significance criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are summarized in the checklist above, and discussed in more detail in Section 4.8.6.

4.8.2 Regulatory Setting

4.8.2.1 Federal

MCB Camp Pendleton

MCB Camp Pendleton Fire Prevention Office

The MCB Camp Pendleton Fire Prevention Office oversees fire prevention work guidelines for the Base. There are two guidelines that are applicable to the TL 695 and TL 6971 Reconductor Project, obtaining a hot work permit¹ and complying with fire weather restriction days.

Other Federal Regulations

Resource Conservation and Recovery Act (RCRA)

The federal RCRA of 1976 established a program administered by the U.S. Environmental Protection Agency (USEPA) for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA. Individual states may implement hazardous waste programs under RCRA with USEPA approval.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

The CERCLA, which is often commonly referred to as Superfund, is a federal statute that was enacted in 1980 to address abandoned sites with hazardous waste disposal and/or contamination (42 U.S. Code [USC] Section 9601 et seq.). CERCLA was amended in 1986 by the Superfund Amendments and Reauthorization Act and by the Small Business Liability Relief and Brownfields Revitalization Act of 2002. CERCLA establishes prohibitions and requirements concerning closed and abandoned hazardous waste sites; establishes liability of persons responsible for releases of hazardous waste at these sites; and establishes a trust fund to provide for cleanup when no responsible party could be identified. The trust fund is funded largely by a tax on the chemical and petroleum industries. CERCLA also provides federal jurisdiction to respond directly to releases or impending releases of hazardous substances that may endanger public health or the environment.

Department of Defense Instruction (DoDI) 6055.6

The DoDI 6055.6 sets forth Department of Defense (DoD) policy to establish and maintain a comprehensive Fire and Emergency Services (F&ES) Program as an element of the overall DoD Environmental, Safety, and Occupational Health Program. The intent is to protect DoD personnel and the public from risk of death, injury, illness, or property damage as a result of DoD activities; and to prevent and minimize loss of DoD lives and damage to property and the environment occurring in periods of peace, war, homeland security/defense, military operations other than war, and humanitarian operations.

¹ A hot work permit applies to welding, cutting and/or brazing. A permit provides a checklist for hot work fire safety and is issued by an authorized individual after an inspection of the work area is performed (Occupational Safety and Health Administration n.d.).

Pursuant to DoDI 6055.6, when called upon and approved by appropriate authority, DoD F&ES capabilities may be made available to assist civil authorities under mutual aid agreements, host nation support agreements, and Defense Support of Civil Authorities. It is expected that by accomplishing the aforementioned, it will enhance DoD mission capability by protecting the U.S. homeland and critical bases of operation through preventive risk management, education, emergency response, and risk communication.

Additional Federal Regulations

The following additional federal planning documents or regulations are applicable to the Proposed Project:

- Occupational Safety and Health Administration (OSHA) (29 Code of Federal Regulations (CFR), Part 1910, Subpart H)
- Toxic Substances Control Act (15 USC Section 2601 et seq.)
- Marine Corps Order 5090.2A (Environmental Compliance and Protection Manual)

4.8.2.2 State

California Code of Regulations (CCR), Title 22, Division 4.5, Chapter 11, Article 2, Section 66261

The CCR, Title 22, Division 4.5, Chapter 11, Article 2, Section 66261.10, provides the following definition:

(a) The Department shall identify and define a characteristic of hazardous waste in article 3 of this chapter only upon determining that:

(1) a waste that exhibits the characteristic may:

(A) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or

(B) pose a substantial present or potential hazard to human health or the environment when it is improperly treated, stored, transported, disposed of or otherwise managed; and

(2) the characteristic can be:

(A) measured by an available standardized test method which is reasonably within the capability of generators of waste or private sector laboratories that are certified by the Department pursuant to Chapter 44 of this division and available to serve generators of waste; or

(B) reasonably detected by generators of waste through their knowledge of their waste.

According to CCR Title 22 (Title 22, Division 4.5, Chapter 11, Article 3), substances having a characteristic of toxicity, ignitability, corrosivity or reactivity are considered hazardous. Hazardous wastes are hazardous substances that no longer have a practical use, such as material that has been abandoned, discarded, spilled, contaminated, or is being stored prior to proper disposal.

Soil that is excavated from a site containing hazardous materials would be a hazardous waste if it exceeded specific CCR Title 22 criteria. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials is performed; it may also be required if certain other activities are proposed. If soil or groundwater at a contaminated site does not meet the regulated characteristics required to be defined as hazardous waste, remediation of the site may be

required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking lead jurisdiction.

California Hazardous Waste Control Law (HWCL)

The California HWCL is administered by the California Environmental Protection Agency to regulate hazardous wastes within California. While the HWCL is generally more stringent than RCRA (for example, asbestos containing materials are considered to be hazardous under HWCL, but are not regulated under RCRA), both the state and federal laws apply in California. The California Department of Toxic Substances Control (DTSC) is the primary agency in charge of enforcing both the federal and state hazardous materials laws. The DTSC regulates hazardous waste, oversees the cleanup of existing contamination, and pursues avenues of reducing the hazardous waste produced in California. The DTSC regulates hazardous waste in California under the authority of RCRA, the HWCL, and the California Health and Safety Code.

California Occupational Safety and Health Administration (Cal/OSHA)

Cal/OSHA is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations, although Cal/OSHA has adopted and implements all of the OSHA standards within California. 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. Similar to the federal OSHA, Cal/OSHA contains requirements to prevent worker exposure to certain types of hazardous substances in the work place, such as asbestos and lead.

Hazardous Materials Disclosure Programs

The Unified Program administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for the state's environmental and emergency management programs, which include Hazardous Materials Release Response Plans and Inventories (business plans), the California Accidental Release Prevention Program, and the Underground Storage Tank Program. The Unified Program is implemented at the local government level by Certified Unified Program Agencies (CUPAs).

California Public Utilities Commission (CPUC)

Originally adopted in 1941, General Order (GO) 95 governs the design, construction, and maintenance of overhead electrical lines. Rule 31.1 of GO 95 generally requires that overhead electrical lines be designed, constructed, and maintained in accordance with accepted good practices for the given conditions known at the time. Rule 35 of GO 95 establishes requirements for tree trimming.

On January 18, 2012, after a three year rulemaking to review measures to reduce fire hazards associated with overhead power lines and communication facilities, the CPUC issued D.12-01-032 which adopted significant revisions to GO 95, GO 165, and GO 166, Inspection Requirements for Electric Distribution and Transmission Facilities. Phase I and Phase II revisions to the GO's addressed vegetation management practices, inspection cycles, corrective maintenance timeframes and other fire reduction measures in fire threat zones.

Additional State Regulations

The following additional state planning documents or regulations are applicable to the Proposed Project:

- 2010 Strategic Fire Plan for California (California Department of Forestry and Fire Protection [CAL FIRE])
- Hazardous Waste Haulers Act (California Health and Safety Code, Division 20, Article 6.5)

4.8.2.3 Local

As provided in CPUC GO 131-D, the CPUC preempts local discretionary authority over the location and construction of electrical utility facilities. The following discussion of relevant local land use plans and policies that pertain to hazards and hazardous materials is provided below for informational purposes.

Orange County

The Hazardous Materials Division within the Orange County Department of Environmental Health is certified by California Environmental Protection Agency as the local CUPA for Orange County, regulating hazardous material business plans, hazardous waste and tiered permitting, underground storage tanks, and above ground petroleum tanks and risk management. The Safety Element of the Orange County General Plan (County of Orange 2014) presents a comprehensive range of goals, objectives, and policies regarding hazardous materials. A selection of applicable goals, policies, and/or objectives are listed below:

- Respond to all emergency incidents to oversee and ensure that these incidents involving hazardous waste, and medical waste are properly mitigated.
- Inspect, evaluate, and maintain an adequate surveillance of hazardous materials, hazardous waste, and medical waste in order to ensure full compliance with the laws and regulations.
- Implement the Orange County Emergency Plan particularly sections addressing hazardous waste, medical waste, and nuclear materials incidences. This will help to foster participation in countywide planning efforts.
- Cooperate in providing coordinated emergency plans specific to the SONGS.
- Participate in mechanisms for coordinated emergency planning and response among the utility and other governmental jurisdictions.

4.8.2.4 SDG&E Standards, Plans, and Procedures

SDG&E's Electric Standard Practice 113.1 (Wildland Fire Prevention and Fire Safety)

SDG&E's Electric Standard Practice 113.1 constitutes SDG&E's wildland fire prevention and fire safety standards for all activities, including construction activities such as those included as part of the Proposed Project. The purpose of Electric Standard Practice 113.1 is to formalize procedures and routine construction practices that will, among other things: improve SDG&E's ability to prevent the start of any fire; set standards for tools and equipment to assist with rapid response to small fires; incorporate federal, state and local requirements into standard business practices; establish "Red Flag Warning" restrictions; set criteria for when a formal project specific fire plan is required; and establish a template and requirements for formal project specific fire plans.

SDG&E Fire Prevention Plan

The SDG&E Fire Prevention Plan was prepared in compliance with CPUC Decision 12-01-032 (Fire Safety Order) and provides “a comprehensive inventory of the organizational and operational activities that SDG&E undertakes in order to address the risk of fire in the SDG&E service territory.”

SDG&E undertakes and implements numerous fire prevention and safety programs, procedures, and protocols and the SDG&E Fire Prevention Plan includes descriptions of SDG&E fire prevention and safety procedures and programs including fire threat and risk area mapping; operational practices to reduce the risk of fires; field practice guidelines; advanced vegetation management; fire hardening programs; and other related plans and programs.

As part of SDG&E's fire threat and risk mapping program, SDG&E uses a network of weather stations to monitor for high risk weather conditions, such as extreme winds. Fire hardening of facilities involves replacing existing 69kV power lines located in fire threat zones and high risk fire areas with new steel pole structures (which will be installed following the removal of existing wood pole structures) that meet current design standards. The Proposed Project includes reconductoring and fire hardening activities.

TL 695 and TL 6971 Construction Fire Prevention Plan

A project specific fire plan has been developed for the Proposed Project. The TL 695 and TL 6971 Construction Fire Prevention Plan (Appendix 4.8-B) is consistent with the Electric Standard Practice 113.1. The Plan is intended to identify risk-related activities as well as measures (including tools and procedures) to address these risks.

4.8.3 Existing Conditions

4.8.3.1 Existing Setting

The following paragraphs describe the existing setting in the context of emergency response, hazardous materials, fire hazards, and potentially affected land uses (including schools, hospitals, and airports).

Emergency Response

Within the Proposed Project area, emergency response is handled first and primarily by the individual municipal agency with jurisdictional authority. For the portions of the project that occur within MCB Camp Pendleton, emergency response will be initiated by first responders located within MCB Camp Pendleton. Mutual aid, response, and emergency management are available from state government agencies where appropriate or by direct request of either the local agency or MCB Camp Pendleton. The standard emergency response procedures for each of the relevant jurisdictions are outlined within the following subsections. Likewise, in the unlikely event that an evacuation is necessary, it will be carried out by the appropriate jurisdictional agencies (e.g., state, local, or military police). Potential evacuation scenarios identified by various Orange County, MCB Camp Pendleton, and SONGS planning documents include those initiated by radiation emission from the SONGS facility, wildland fires, a tsunami, and/or terrorist attack. The following paragraphs describe emergency response plans and provisions of federal, state, and local entities having jurisdiction in and around the Proposed Project.

MCB Camp Pendleton

Chapter 7 of Marine Corp Order P5090.2A Change 3 establishes Marine Corps policy and responsibilities for compliance with statutory requirements for emergency planning and response. This chapter also identifies procedures for preventing and providing proper training for oil discharges and hazardous

substance releases to the air, land, and water. It outlines the Marine Corps organizational structure for response to its own spills as well as to non-Marine Corps spills that occur on and off an installation. Finally, the chapter identifies the responsibilities of installation commanders; handlers of petroleum, oil, lubricants and hazardous substances; and response team members.

California

The State Emergency Plan outlines the emergency management system for use during all emergencies within the State of California. The State Emergency Plan is developed, maintained, and implemented by the California Office of Emergency Services. The State Emergency Plan defines the “policies, concepts, and general protocols” for the proper implementation of the California Standardized Emergency Management System (SEMS). The SEMS is an emergency management protocol that agencies within California must follow during multiagency response efforts whenever state agencies are involved. This will apply to the portions of the project that are located outside of MCB Camp Pendleton.

Orange County

The Orange County Emergency Operations Center (EOC) coordinates the County-wide response effort in the event of a disaster situation. The EOC is responsible for notifying appropriate agencies in the event of a disaster, as well as coordinating all responding agencies. The Orange County Sheriff's Department Emergency Management Division provides emergency management and preparedness services to the unincorporated areas of Orange County and supports the efforts of the Orange County Operational Area (OA). There are currently 115 jurisdictions in the OA, encompassing all County departments and agencies, public and private organizations and the general population within the boundaries of Orange County. The OA Executive Board has 11 members, and this Board is responsible for the development, establishment and implementation of the policies of the OA. The Orange County Board of Supervisors has designated the Sheriff-Coroner Department as the lead agency in matters of emergency preparedness and disaster response.

City of San Clemente

The City of San Clemente Emergency Plan (Emergency Plan) is a SEMS compliant plan that was published in 2003 and was developed specifically to prepare for, respond to, and recover from any emergency or disaster that may affect the City of San Clemente. The Emergency Plan outlines specific steps for the City's response to a number of different emergencies. The Emergency Plan's main focus is a potential event at SONGS. The Emergency Plan also has a specific section for hazardous materials emergencies (City of San Clemente Multi-Hazard Plan Part Two – Annex C). The hazardous materials emergencies section states that in the case of an emergency where evacuation is required, evacuation routes would be determined based upon the location and nature of the emergency.

The City of San Clemente contracts with the County for Law and Fire Protection services. Therefore, the Orange County Fire Authority and Sheriff's Department would represent first responders within the City of San Clemente and would provide mutual aid response within the Orange County OA.

Hazardous Materials

A search of GeoTracker (California State Water Resources Control Board [SWRCB] 2015) and Envirostor (DTSC 2015) databases revealed that there are no hazardous materials sites within the immediate vicinity of the TL 695 and TL 6971 alignment or substations that could potentially impact the Proposed Project, the public, or the environment (Appendix 4.8-A).

Fire Hazards

Much of the Proposed Project alignment is located within and is surrounded by undeveloped land that has the potential for wildland fires. SDG&E has designated the Proposed Project area and vicinity as a High-to-Very High Fire Threat Zone based on CAL FIRE's Wildland Fire Threat data, which includes factors such as humidity, air temperature, prevalence of strong winds, and existing fuel type assessment (CAL FIRE 2005; Figure 4.8-1, Regional Fire Threat Zones). These areas are designated by wildland fire threat relative to the fuel, weather, and topography of the area with ratings of moderate, high, very high and extreme. However, fire hazard designations are based in-part on extreme weather conditions which do not occur all the time.

The status of the fire threat will vary based on the local site specific conditions. These conditions are monitored and assessed daily by SDG&E. Therefore, even though the Proposed Project may be located within the geographic boundaries of designated high-to-very high fire threat areas, the actual fire threat is lower when extreme local weather conditions are not present.

Dam Failure Inundation Areas

The California Office of Emergency Services is responsible for the identification of inundation areas for dam failures in California. The list is intended to guide local jurisdictions in developing evacuation plans for areas located below such dams to minimize public risk. Estimated times when floodwaters will arrive at certain locations downstream are also provided to guide such planning efforts. The Proposed Project area is not located within an inundation area for dam failure.

Potentially Affected Land Uses*Schools*

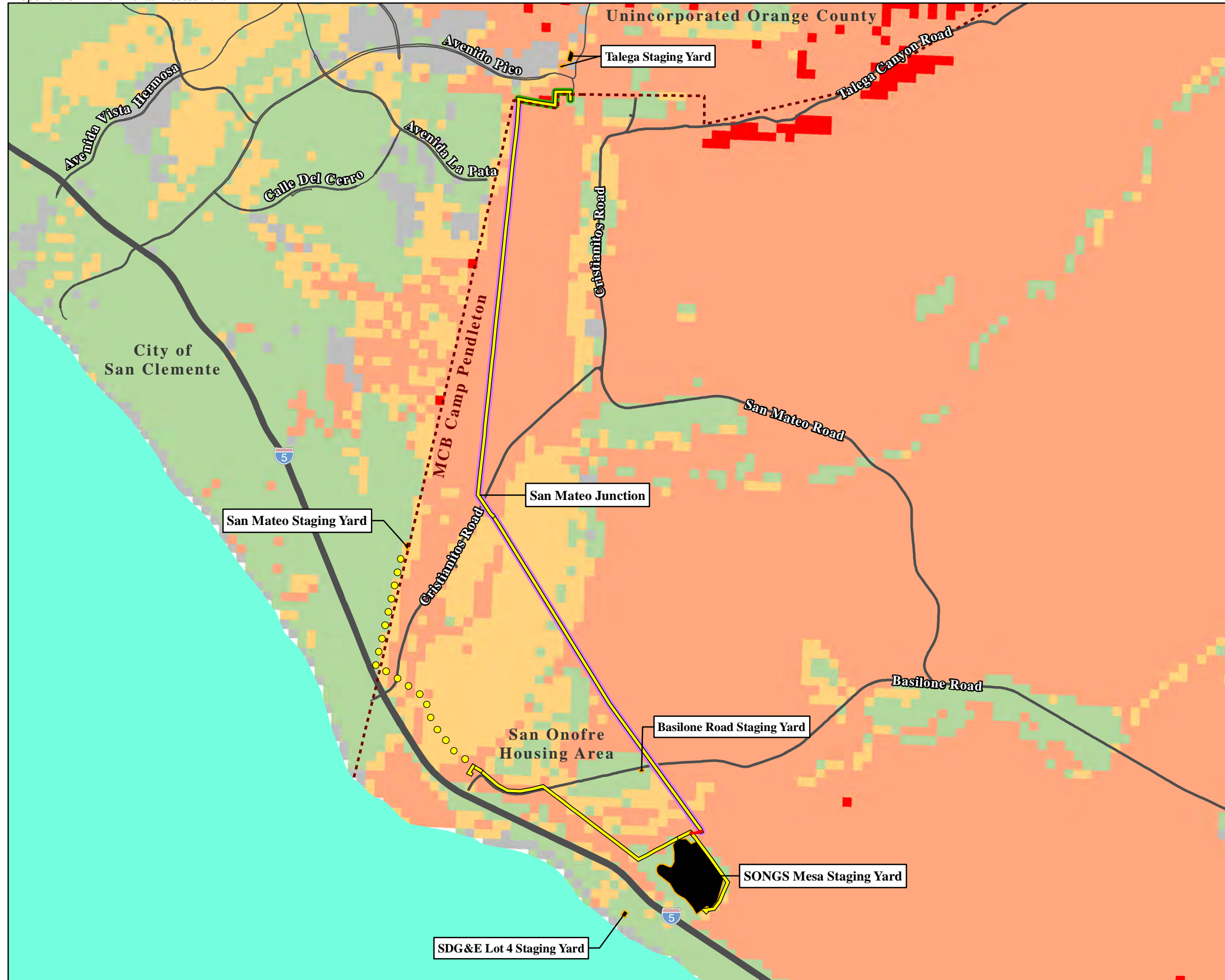
There are two schools located within 0.25 miles of the Proposed Project alignment. The closest schools to the Proposed Project alignment are: (1) San Onofre Elementary School, located approximately 0.16 mile away from the Proposed Project alignment, on MCB Camp Pendleton near the Basilone Gate; and (2) Concordia Elementary School, located approximately 0.24 miles away from the Proposed Project alignment, in San Clemente northwest of the Interstate 5 at Cristianitos Road.

Hospitals

There are no hospitals located in the immediate vicinity of the Proposed Project. The closest hospital to the Proposed Project within MCB Camp Pendleton is the Naval Hospital, approximately 14 miles away on the southern end of MCB Camp Pendleton. Nearer to the Proposed Project in San Clemente, the Saddleback Memorial Medical Center is located approximately 7 miles northwest of the intersection of Cristianitos Road and El Camino Real.

Airports

There are no airports within the immediate vicinity of the Proposed Project, nor is the Proposed Project area located within an airport land use plan (County of Orange 2008). The closest airport is Marine Corps Air Station Camp Pendleton, located within MCB Camp Pendleton, approximately 13 miles southeast of the Proposed Project alignment. The closest public airports to the Proposed Project are: (1) the Oceanside Municipal Airport, located approximately 16 miles to the southeast; and (2) John Wayne Airport, approximately 18.7 miles to the northwest. The closest private airstrip is located approximately 14.5 miles north of the Proposed Project in Trabuco Canyon.



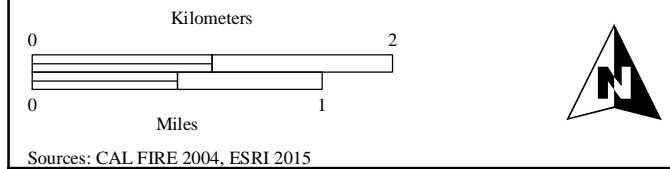
**Figure 4.8-1
Regional Fire Threat Zones**

LEGEND

- MCB Camp Pendleton Boundary
- Proposed Project Reconductor Route
- Proposed Project Underground Route
- Proposed Power Line Removal Segment
- Staging Yard
- Existing Utility Corridor Also Containing Other SDG&E Facilities (138kV and 230kV)
- Existing Utility Corridor Also Containing Other SDG&E Facilities (138kV and 230kV) and SCE Facilities

Fire Threat

- Little or No Threat
- Moderate
- High
- Very High
- Extreme



Sources: CAL FIRE 2004, ESRI 2015

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4.8.4 Applicant Proposed Measures

The Proposed Project will have a less than significant impact to hazards and hazardous materials; therefore, no APMs are proposed.

4.8.5 Potential Impacts

The Proposed Project includes reconductoring, removal of existing wood pole structures, and installation of new steel pole structures for the existing TL 695 and TL 6971 power lines. The operation and maintenance activities required for the power lines will not change from those currently required for the existing system; thus, no additional operation-related impacts related to hazards and hazardous materials will occur. Furthermore, maintenance will decrease slightly due to the removal of wood pole structures and the installation of steel pole structures. Therefore, the impact analysis is focused on construction activities that are required to install the new conductor, remove the existing wood pole structures, install the new steel pole structures, and establish required access and temporary work areas, as described in Chapter 3.0, Proposed Project Description.

4.8.5.1 Methodology

The analysis of hazards and hazardous materials included a review of hazardous materials and wastes databases (i.e., GeoTracker); review of emergency response and evacuation policies and procedures in the documents referenced above; and a review of laws regulating the handling and use of hazardous materials. The review also included the use of geographic information system data to identify regional fire threat zones proximate to the Proposed Project. A qualitative analysis is provided to determine whether the Proposed Project will have a substantial impact relative to hazards and hazardous materials.

4.8.5.2 Significance Criteria

According to Section 15002(g) of the CEQA Guidelines, “a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.” As stated in Section 15064(b) of the CEQA Guidelines, the significance of an activity may vary with the setting. The potential significance of project-related impacts on hazards and hazardous materials were evaluated for each of the criteria listed in the checklist, as discussed below.

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

Vehicles and equipment used for construction could contain or require the temporary, short-term use of potentially hazardous substances, such as fuels, lubricating oils, and hydraulic fluids. The potential exists for an accidental release of hazardous materials during construction and refueling activities. The release of these materials has the potential to impact construction workers, the public, and the environment if the release is not properly contained and cleaned up. Potential impacts from the release of these materials will be addressed by the implementation of a worker environmental awareness training program, and through adherence to relevant local, state, and federal hazardous materials regulations and statutes.

Further, the construction contractor will also implement (in addition to regulatory and SDG&E requirements) their own compliance management programs to ensure that regulatory requirements are adhered to and that worker and public safety are secured.

Therefore, based on the preceding analysis, the Proposed Project will have a less than significant impact with respect to the routine transport, use, or disposal of hazardous materials.

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

Construction of the Proposed Project will include the handling and use of common hazardous materials such as fuels and lubricants. Additionally, helicopters performing construction operations have the potential to release fuels and lubricants to the environment in the event that upset and accident conditions occur. The use of these materials during construction will not require frequent transportation or the transportation of unusually large amounts of the materials. In addition, SDG&E will implement a worker environmental awareness training program that will further minimize the risk of upset and/or accidental release of hazardous substances creating a significant adverse environmental effect. Therefore, the Proposed Project will have a less than significant impact with respect to hazards associated with upset or accidental release.

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

There are two schools located within 0.25 mile of the Proposed Project alignment. The closest schools to the Proposed Project alignment are: (1) San Onofre Elementary School, located approximately 0.16 mile away from the Proposed Project alignment, on MCB Camp Pendleton near the Basilone Gate; and (2) Concordia Elementary School, located approximately 0.24 mile away from the Proposed Project alignment, in San Clemente northwest of the Interstate 5 at Cristianitos Road. While construction of the Proposed Project will include the handling and use of hazardous substances, the use and transport of hazardous materials does not represent a significant risk of hazardous substances release to any existing schools. Furthermore, with the implementation of SDG&E's Best Management Practices Manual for Water Quality Construction, the Proposed Project is not expected to result in the release of hazardous emissions, or hazardous materials in the vicinity of schools. Therefore, the Proposed Project will have a less than significant impact with respect to schools.

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? No Impact

A review of standard and supplemental environmental databases indicate that the Proposed Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Additionally, there are no active hazardous materials sites meeting the criteria outlined in Government Code Section 65962.5 along the Proposed Project alignment (SWRCB 2015, DTSC 2015).

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? Less than Significant

The Proposed Project is not located within an existing airport land use plan, and the closest public airport (Oceanside Municipal Airport) is located approximately 16 miles from the Proposed Project location. Although it is not a public use airport, Marine Corps Air Station Camp Pendleton is situated approximately 13 miles away from the Proposed Project. Construction of the Proposed Project will include the potential use of light-, medium- and/or heavy-duty helicopters. Helicopter operators will coordinate with local and military air traffic control and comply with all relevant regulations. Helicopter

operations will be occurring within military airspace and have the potential to affect military use of airspace during construction and add additional aircraft and aircraft maneuvers to the existing airspace. However, SDG&E will coordinate with MCB Camp Pendleton and Marine Corps Air Station Camp Pendleton to ensure that no conflicts with other air traffic will occur, thereby minimizing the safety hazard. While the Proposed Project does include the installation of vertical structures (power line pole structures), new pole structures will not be located in areas that do not already have similar structures. An airspace obstruction analysis of the Proposed Project structures will be conducted by SDG&E to determine Federal Aviation Administration (FAA) noticing requirements, and appropriate lighting and marking measures will be implemented consistent with FAA recommendations and advisories and SDG&E internal policy. Therefore, the Proposed Project will have a less than significant impact with respect to potential aviation safety hazards relative to public airports.

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? No Impact

The Proposed Project is not located within the immediate vicinity of a private airstrip. The closest private airstrip is located approximately 14.5 miles north of the Proposed Project in Trabuco Canyon. Construction of the Proposed Project will include the utilization of helicopters. Helicopter operators will coordinate with local air traffic control and comply with all relevant regulations to ensure that no conflicts with other air traffic occur. Therefore, the Proposed Project will have no impact with respect to potential aviation safety hazards relative to private airstrips.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Less than Significant

In the event of emergency response, there will be an initial coordinated effort between the state, county, and military responders. This coordination will also lead evacuation efforts in the unlikely (but possible) event that it will be necessary in Proposed Project or vicinity.

As construction of the Proposed Project will include the use of helicopters, helicopter operators will coordinate with local air traffic control and comply with all relevant regulations to ensure that no conflicts with other air traffic occur, including potential emergency response and evacuation.

Construction of the Proposed Project will involve temporary partial closure of certain streets during construction activities. However, at least one lane of traffic will be kept open during construction at all times (as discussed in Section 4.16, Traffic and Transportation). Therefore, the Proposed Project will have a less than significant impact with respect to emergency response or emergency evacuation plans.

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? Less than Significant

While construction of the Proposed Project will place construction workers temporarily within the designated High-to-Very High Fire Threat Zone, construction work will be temporary and workers will only be within each distinct construction area for a relatively short amount of time. However, construction activities do have the potential to start a fire due to the increased presence of vehicles, equipment, and human activity in areas of elevated fire hazard severity. In particular, heat or sparks from construction vehicles or equipment have the potential to ignite dry vegetation. Once ignited, an existing fire can be accelerated by windy conditions and/or prop wash from helicopters. However, with the implementation of the TL 695 and TL 6971 Construction Fire Prevention Plan, construction of the Proposed Project will not expose people or structures to significant risk of loss, injury or death involving wildland fires. The project

specific fire plan includes procedures and tools that are designed to minimize the risk of starting fires during construction and increase the ability to suppress a fire in the unlikely event that one is ignited. The project specific fire plan includes (but is not limited to) the following procedures:

- 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.

During construction activities, workers will follow the TL 695 and TL 6971 Construction Fire Prevention Plan, and the guidance provided by the MCB Camp Pendleton Fire Prevention Office to ensure that the risk of a fire event during construction of the Proposed Project is minimized. The relevant portions of these documents are incorporated into the design of the Proposed Project, and will be used to ensure that potential impacts relating to wildland fires remain less than significant. Therefore, the Proposed Project will have a less than significant impact with respect to wildland fires.

4.8.6 References

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