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4.7 HAZARDS AND HAZARDOUS MATERIALS

Would the project:		Potentially Significant Impact	Potentially Significant Unless APMs 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

4.7.1 Introduction

This section of the PEA describes the existing conditions and potential Proposed Project-related impacts from hazards or hazardous materials associated with the construction, operation, and maintenance of the Proposed Project. Potential impacts relating to hazards and hazardous materials would be less than significant through implementation of project design features and ordinary construction and operating restrictions, as well as through adherence to applicable laws and regulations.

4.7.2 Methodology

4.7.2.1 Hazardous Materials and Wastes Database Search

The State of California Department of Toxic Substances Control (DTSC) maintains the EnviroStor public website that provides detailed information on hazardous waste permitted and corrective action facilities, as well as existing site cleanup information. The SWRCB maintains the GeoTracker public website that provides information on hazardous material sites that impact groundwater, especially sites requiring groundwater remediation. The Proposed Project area was reviewed utilizing both databases in order to identify known sites with existing hazardous materials or waste usage or contamination that could affect the Proposed Project.

4.7.2.2 Emergency/Evacuation Plans and Local Municipality Planning Documents

Emergency response and evacuation documents from San Diego County were reviewed and analyzed for hazardous materials response procedures, evacuation routes, and policies that may be applicable to the Proposed Project. The scope of the Proposed Project was analyzed with respect to all existing emergency response and evacuation plans within the Proposed Project vicinity in order to identify any potential conflicts that may result from construction, operation, or maintenance of the Proposed Project.

The *San Diego County General Plan* was reviewed for goals, objectives, and policies pertaining to hazardous materials or waste storage, handling, utilization or disposal. Any inconsistencies identified between the Proposed Project and said goals, objectives, and policies were analyzed with respect to the significance criteria (see Section 4.7.4.1) in order to determine the presence or absence of potential significant impacts.

4.7.3 Existing Conditions

4.7.3.1 Regulatory Setting

The following section provides an overview of pertinent federal, state and local hazardous materials and safety regulations applicable to the Proposed Project.

Federal

Resource Conservation and Recovery Act

The federal Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by the 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

The Comprehensive Environmental Response, Compensation, and Liability Act (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 USC 9601, et seq.). CERCLA was amended in 1986 by the Superfund Amendments and Reauthorization Act (SARA) 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.

Occupational Safety and Health Administration

The Occupational Safety and Administration (OSHA) regulations intended to create a safe workplace are found at 29 CFR, Part 1910, Subpart H, and include procedures and standards for safe handling, storage, operation, remediation, and emergency response activities involving hazardous materials and waste. Section 1910.120 (Hazardous Waste Operations and Emergency Response) contains requirements for worker training programs, medical surveillance for workers engaging in the handling of hazardous materials or wastes and hazardous material, and waste site emergency and remediation planning, for those who are engaged in one of the following operations as specified by Sections 1910.120(a)(1)(i-v) and 1926.65(a)(1)(i-v):

- Clean-up operations required by a governmental body, whether federal, state, local, or other, involving hazardous substances, that are conducted at uncontrolled hazardous waste sites;
- Corrective actions involving clean-up operations at sites covered by RCRA, as amended (42 USC 6901, et seq.);
- Voluntary clean-up operations at sites recognized by a federal, state, local, or other governmental body as uncontrolled hazardous waste sites;
- Operations involving hazardous wastes that are conducted at treatment, storage, and disposal facilities regulated by Title 40 CFR Parts 264 and 265 pursuant to RCRA, or by agencies authorized under agreement with USEPA to implement RCRA regulations; or
- Emergency response operations for releases of, or substantial threats of releases of, hazardous substances regardless of the location of the hazard.

The Occupational Safety and Health Act of 1970 contains specific regulations that ensure worker safety in the presence of certain hazardous substances, such as lead and asbestos.

Cleveland National Forest Fire Plan

The *Cleveland National Forest Fire Plan* sets forth provisions that outline the responsibility of the Special Use Authorization Holder (SDG&E) in preventing and responding to fires within the Special Use Authorization Area. These provisions include operational guidelines, tool and equipment specifications, and specific conditions under which construction activities must be

scaled down or halted altogether until the dangerous conditions abate. The *Cleveland National Forest Fire Plan* is included as Appendix 4.7-B.

State

California Code of Regulations, Title 22, Chapter 11, Article 2, Section 66261

The California Code of Regulations (CCR), Title 22, Chapter 11, Article 2, Section 66261 provides the following definition:

A hazardous material is 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.

According to CCR Title 22 (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

The California Hazardous Waste Control Law (HWCL) is administered by the CalEPA to regulate hazardous wastes within the State of 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 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.

The HWCL, under CCR Title 22, Chapter 11, Appendix X, lists 791 chemicals and about 300 common materials which may be hazardous; establishes criteria for identifying, packaging and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal and transportation; and identifies some wastes that cannot be disposed of in landfills.

California Occupational Safety and Health Administration

California Occupational Safety and Health Administration (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 the state of 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. It is important to note that while Cal/OSHA has adopted the OSHA standards, the Cal/OSHA regulations are often more stringent than the OSHA standards.

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 G.O. 95 in 1941 (<http://162.15.7.24/PUBLISHED/Graphics/112890.PDF>). G.O. 95 governs the design, construction, and maintenance of overhead electrical lines. Rule 31.1 of G.O. 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 G.O. 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 G.O. 95, G.O. 165, and G.O. 166, Inspection Requirements for Electric Distribution and Transmission¹ Facilities. Phase I and Phase II revisions to the G.O.'s addressed vegetation management practices, inspection cycles, corrective maintenance timeframes and other fire reduction measures in fire threat zones.

Local*San Diego County*

The Hazardous Materials Division within the San Diego County Department of Environmental Health (DEH) is certified by CalEPA as the local CUPA for San Diego County, regulating

¹ The term "Transmission" as used within this section of the PEA refers to a specific CPUC decision (D.12-01-032) and is not intended to suggest that TL 637 is designed for immediate or eventual operation at 200kV or above.

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 *San Diego County General Plan* contains the following goals and policies regarding hazardous materials:

Goal S-11: Controlled Hazardous Material Exposure. Limited human and environmental exposure to hazardous materials that pose a threat to human lives or environmental resources.

Policy S-11.1: Land Use Location. Require that land uses involving the storage, transfer, or processing of hazardous materials be located and designed to minimize risk and comply with all applicable hazardous materials regulation.

Policy S-11.3: Hazards-Sensitive Uses. Require that land uses using hazardous materials be located and designed to ensure sensitive uses, such as schools, hospitals, day care centers, and residential neighborhoods, are protected. Similarly, avoid locating sensitive uses near established hazardous materials users or High Impact Industrial areas where incompatibilities would result.

Policy S-11.4: Contaminated Lands. Require areas of known or suspected contamination to be assessed prior to reuse. The reuse shall be in a manner that is compatible with the nature of the contamination and subsequent remediation efforts.

Policy S-11.5: Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.

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 fire plan is required; and establish a template and requirements for formal fire plans.

SDG&E Fire Prevention Plan

The *SDG&E Fire Prevention Plan* was prepared in compliance with Commission 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, but not limited to, the following:

- Fire threat and risk area mapping;
- Operational practices to reduce the risk of fires;
- Fire prevention outreach and training programs;
- Field practice guidelines;
- Advanced vegetation management;
- Fire Potential Index; and
- Fire-hardening programs and practices, including:
 - Design standards
 - Construction standards
 - Facility inspection
 - Oversight of activities in rural areas
 - Wood-to-Steel Projects

As part of SDG&E's fire threat and risk mapping program, SDG&E utilizes network of 145 weather stations to monitor for high risk weather conditions, such as extreme winds. The SDG&E Wood-to-Steel Projects involve replacing existing 69kV power lines located in fire threat zones and high risk fire areas with new steel poles (replacing existing wood poles) that meet current fire prevention design standards. The Proposed Project is an SDG&E Wood-to-Steel Project.

TL 637 Project Fire Plan

As described in Section 3.8.3, a Project-Specific Fire Plan was developed for the Proposed Project *TL 637 Project Fire Plan*, consistent with *Electric Standard Practice 113.1*, the *SDG&E Fire Prevention Plan*, and the *Cleveland Forest Master Use Plan* and *Cleveland National Forest Fire Plan* (for areas within the Cleveland National Forest). The *TL 637 Project Fire Plan* (refer to Appendix 4.7-C, *TL 637 Project Fire Plan*) identifies risk-related activities as well as measures (including tools and procedures) to address said risks.

4.7.3.2 Emergency Response and Evacuation Regulations and Adopted Plans

Within the Proposed Project area, emergency response is handled first and primarily by the individual municipal agency with jurisdictional authority. Mutual aid, response, and emergency management are available from State government agencies where appropriate or by direct request of the local agency. The standard emergency response procedures and for each of the relevant jurisdictions are outlined within the following subsections.

The State of 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 (OES). 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 the State of California must follow during multi-agency response efforts whenever state agencies are involved.

San Diego County

San Diego County Office of Emergency Services

The San Diego County OES coordinates the County-wide response effort in the event of a disaster situation. OES is responsible for notifying appropriate agencies in the event of a disaster, as well as coordinating all responding agencies. The Unified Disaster Council is the governing body of OES, and is chaired by the Chair of the San Diego County Board of Supervisors, and includes representatives from the 18 incorporated cities of the County. OES serves as staff to the Unified Disaster Council and acts as a liaison between the incorporated cities, the State Office of Emergency Services and Federal Emergency Management Agency (FEMA), as well as non-governmental agencies such as the American Red Cross. OES, along with numerous regional partners have completed two important public safety preparedness plans related to disaster evacuations and recovery:

The San Diego Operational Area Evacuation Plan – The San Diego Operational Area Evacuation Plan is intended to be used as a template, as cities throughout the County continue to develop their individual evacuation plans. The Plan outlines procedures and organizational structures that can be used for a coordinated regional evacuation effort. Transportation routes and capacities are identified in addition to countywide shelter space and considerations for special needs populations.

The San Diego Operational Recovery Plan – The San Diego Recovery Plan is designed to provide guidance to jurisdictions and organizations within the County of San Diego as they continue their own recovery planning. The San Diego Recovery Plan addresses short and long-term restoration plans for communities impacted by disaster, including issues such as: debris removal, coordination of financial assistance and housing, economic recovery, and measures to reduce or eliminate the effects of future incidents.

The San Diego County OES also prepared and implements the San Diego County Multi-Jurisdictional Hazard Mitigation Plan. The Multi-Jurisdictional Hazard Mitigation Plan identifies hazards that could potentially affect any or all portions of the County as well as measures for the prevention and minimization of such hazards. The Multi-Jurisdictional Hazard Mitigation Plan was prepared in accordance with the Federal Disaster Mitigation Act of 2000. The preparation of the Multi-Jurisdictional Hazard Mitigation Plan qualifies the County for post-disaster funds from the Hazard Mitigation Grant Program.

San Diego County General Plan

The Safety Element of the *San Diego County General Plan* contains goals and policies pertaining to public safety and emergency response. Specifically:

Public Safety

Policy S-1.1: Minimize Exposure to Hazards. Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

Policy S-1.2: Public Facilities Location. Advise, and where appropriate require, new development to locate future public facilities, including new essential and sensitive facilities, with respect to the County's hazardous areas and State law.

Policy S-1.3: Risk Reduction Programs. Support efforts and programs that reduce the risk of natural and man-made hazards and that reduce the time for responding to these hazards.

Policy S-1.5: Post-disaster Reconstruction. Participate in the development of programs and procedures that emphasize coordination between appropriate public agencies and private entities to remove debris and promote the rapid reconstruction of the County following a disaster event and facilitate the upgrading of the built environment as expeditiously as possible.

Emergency Response

Goal S-2: Emergency Response. Effective emergency response to natural or human-induced disasters that minimize the loss of life and damage to property, while also reducing disruptions in the delivery of vital public and private services during and following a disaster.

4.7.3.3 Hazardous Materials Setting

Hazardous materials would be used and stored during construction, operation, and maintenance of the Proposed Project. The following subsections describe the types and amounts of hazardous materials present, or potentially present, along the Proposed Project alignment including existing wastes and materials (hazardous materials sites) and typical hazardous materials utilized during construction, operation, and maintenance.

Hazardous Materials Utilized during Construction

Construction activities would involve the periodic and routine transport of common potentially hazardous materials such as hydrocarbon fuels, lubricating oils, internal combustion engine oils, cartridges containing primer for ignition and nitrocellulose propellant for gas production in the event that blasting is necessary, transmission fluid, and various hydraulic fluids.

Hazardous Materials Utilized During Operation and Maintenance

Operation and Maintenance of the Proposed Project would not be substantially different from existing operation and maintenance practices and activities that SDG&E currently performs along TL 637 and at the Creelman and Santa Ysabel Substations. Operation and maintenance of the Proposed Project would be subject to the same laws and regulations governing the handling

and disposal of hazardous materials. All relevant local, state and federal regulations will be followed.

Hazardous Materials Sites within or Adjacent to the Proposed Project

Table 4.7-1: Hazardous Materials Sites Adjacent to the Proposed Project, lists all hazardous materials sites within the immediate vicinity of the TL 637 ROW or substations that could potentially impact the Proposed Project, public, or the environment.

Table 4.7-1: Hazardous Materials Sites Adjacent to the Proposed Project

Site Name, Address, and Closest Proposed Project Structure	Regulatory Listing	Contamination Profile
Mountain Proflame Gas (LP), 30275 Highway 78; Santa Ysabel Substation	Category 1 Open Site Assessment	Contaminants of Concern: Diesel Fuel Affecting Soil Quality
Santa Ysabel (Formerly Chevron), 30350 Highway 78; Santa Ysabel Substation	Category 3 Leaking Underground Storage Tank (LUST)	Contaminants of Concern: Gasoline
Santa Ysabel Old Barn Site, 21800 Washington Street; Santa Ysabel Substation	Category 1 Open Site Assessment	No Contamination Profile Provided

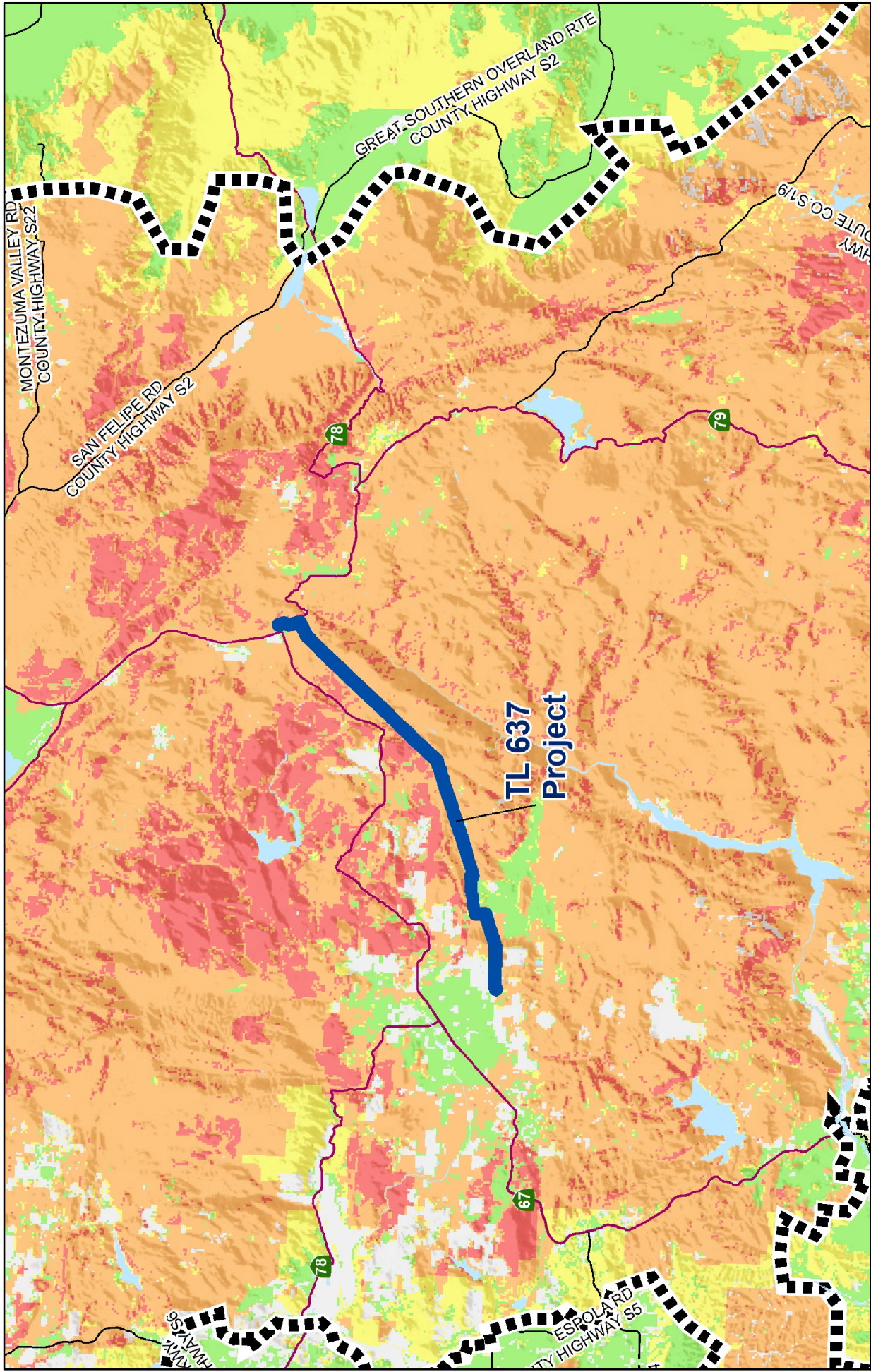
4.7.3.4 Hazards Setting

Existing Electric Substations and Power Line Facilities

The Proposed Project includes the replacement of existing electric power line and distribution and facilities. It is located entirely within or adjacent to existing electric power lines, distribution facilities and substations and does not include the installation of new electric power line facilities in areas where similar facilities do not already exist. These existing facilities constitute the baseline from which potential hazard and hazardous materials impacts were evaluated.

Fire Hazards

Much of the Proposed Project alignment is located within and is surrounded by undeveloped land that is subject to the potential of wildland fires. SDG&E has designated areas within its service territory as a Fire Threat Zone based on Cal Fires Wildland Fire Threat mapping assessment and local factors such as humidity, air temperature, prevalence of strong winds, and existing fuel type (see Figure 4.7-1, Fire Hazard Severity Map). These areas are designated as such due to the wildland fire threat relative to the fuel, weather, and topography of the area with ratings of moderate, high, very high and extreme.



Tie-Line 637 Wood-To-Steel Project
 Fire Threat Zone Map
Figure 4.7-1

FRAP Fire Threat

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

Tie-Line 637 Alignment

- Tie-Line 637 Alignment
- SDG&E Fire Threat Zone Boundary

Created For:
Brad Carter

Created By:
TRC

Date: 2/25/2013

SDG&E is providing this map with the understanding that the map is not survey grade.



Source: CAL FIRE, Fire and Resource Assessment Program "Fire Threat" Data; SDG&E



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BACK OF FIGURE 4.7-1

Within the Proposed Project area, SDG&E has designated areas as being in the Fire Threat Zone with ratings of very high to extreme fire danger and highest risk fire areas. However, fire hazard designations are based in part on extreme weather conditions (do not occur all the time) and 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 areas designated as fire threat areas, the actual fire threat does not exist if the required local atmospheric conditions are not present.

SDG&E has developed operating protocols and safety standards that minimize the risk of wildland fires during SDG&E construction activities. Specifically, wildland fire prevention during construction is governed internally within SDG&E through implementation of a *TL 637 Project Fire Plan*, and compliance with the *Cleveland National Forest Fire Plan*.

The Safety Element of the *San Diego County General Plan* contains goals and policies pertaining to public safety and emergency response with specific regard to fire hazards:

Goal S-3: Minimized Fire Hazards. Minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards.

Policy S-3.1: Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

Policy S-3.2: Development in Hillside and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.

Policy S-3.6: Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.

Policy S-3.7: Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire threat areas.

4.7.3.5 Schools

The closest schools to the Proposed Project alignment are Ramona High School and Pierce Middle School, located approximately 0.7 mile northwest of the Creelman Staging Yard. Barnett Elementary School is located approximately 0.5 mile from the Proposed Project area, and Spencer Valley Elementary School is located approximately 1.7 miles southeast of the Santa Ysabel Substation.

4.7.3.6 Hospitals

There are no hospitals located in the immediate vicinity of the Proposed Project. The closest hospital to the Proposed Project is the Pomerado Hospital, located approximately 11 miles west of the Creelman Substation.

4.7.3.7 Airports

There are no airports, public or private, within the immediate vicinity of the Proposed Project. The closest public airport to the Proposed Project is the Ramona Airport, located approximately 3.4 miles west-northwest of the Creelman Substation. The closest private airports to the Proposed Project are the Flying J Private Airport (located approximately 1.8 miles northwest of the TL 637 alignment) and the Hoffman Private Airport (located approximately 4.9 miles northwest of the Santa Ysabel Substation).

The Proposed Project is subject to the goals and policies pertaining to airports as outlined in Section 7, Safety Element, Goals and Policies, of the *San Diego County General Plan*, specifically:

Policy S-15.3: Hazardous Obstructions within Airport Approach and Departure. Restrict development of potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas or known flight patterns and discourage uses that may impact airport operations or do not meet Federal or State aviation standards.

4.7.4 Potential Impacts

4.7.4.1 Significance Criteria

Thresholds of impact significance were derived from Appendix G of the *CEQA Guidelines*. Under these guidelines, the Proposed Project could have a potentially significant impact regarding hazards and hazardous materials if it would:

- a) Create a significant hazard to public health 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; or
- 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.

4.7.4.2 Question 7a - Create a significant hazard to public health or the environment through the routine transport, use, or disposal of hazardous materials?

Construction – Less Than Significant Impact

As stated in Section 4.7.3.3 above, 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 they are not properly contained and removed. Potential impacts from the release of these materials would be addressed by the implementation of construction BMPs and, as well as the adherence to relevant state and federal hazardous materials laws and regulations. SDG&E, and all contractors involved in the construction of the Proposed Project, would implement standard operational procedures to ensure that potential impacts resulting from hazardous material transport, use, storage and disposal remain less than significant.

Typical BMPs could include, but would not be limited to, construction practices such as the use of absorbent pads for spill containment, specified locations for construction vehicle refueling, and a daily vehicle inspection schedule designed to identify leaking fuels and/or oils as early as possible.

The construction contractor would 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.

In the unlikely case that blasting is required to construct the Proposed Project, blasting supplies would be transported and used in accordance with all relevant federal, state and local regulations, including requirements for container labeling and other hazard communication requirements. In the event that the handling or disposal of transformers is required, SDG&E would implement standard spill prevention and cleanup procedures, and recycle or dispose of the transformers at an SDG&E approved, government licensed facility.

Operation & Maintenance – No Impact

SDG&E currently maintains and operates existing electric power, distribution and substation facilities throughout the Proposed Project area, and the Proposed Project is the reconstruction of existing electric facilities within existing SDG&E ROW and substation property. SDG&E's existing facilities and operations and maintenance activities constitute the baseline against which the impacts of the Proposed Project are evaluated. Operations and maintenance activities for the

Proposed Project would decrease slightly compared to baseline conditions due to the increased reliability of the new power line components included in a typical wood to steel replacement project, the installation of fewer poles along the alignment, and the relocation of poles outside of jurisdictional features. Any future potential maintenance-related construction projects would be evaluated under G.O. 131-D and CEQA for purposes of assessing whether further CPUC approval is required. All herbicides utilized during maintenance around power line poles would follow SDG&E's existing procedures for application of herbicides and would not be substantially different from current herbicide utilization within the Proposed Project area. Therefore, there would be no impacts.

4.7.4.3 Question 7b - 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?

Construction – Less than Significant Impact

As discussed under Section 4.7.4.2, construction of the Proposed Project will include the handling and use of common hazardous materials such as fuels and lubricants. While the potential for upset conditions to cause a release of these materials during transport does exist, the chances of this occurring are considered to be low, and therefore the risk of upset or accident conditions leading to a significant hazard from the transport of hazardous waste is also considered to be low. 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's standard practices would further minimize the potential risk of upset and/or accidental release of hazardous substances creating a significant adverse environmental effect. Therefore, impacts are anticipated to be less than significant.

Operation & Maintenance – No Impact

As discussed under Section 4.7.4.2, operation and maintenance of the Proposed Project would decrease slightly compared to current operation and maintenance activities. Therefore, no impacts are anticipated to occur.

4.7.4.4 Question 7c - Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction – No Impact

No existing or proposed schools exist within 0.25 miles of the Proposed Project alignment. The closest schools to the Proposed Project alignment are Ramona High School, located approximately 0.7 miles northwest of the Creelman Staging Yard, Barnett Elementary School, located approximately 0.5 mile from the TL 637 alignment, and Spencer Valley Elementary School, located approximately 1.7 miles southeast of the Santa Ysabel Substation. With the implementation of standard operational procedures as well as BMPs, construction of the Proposed Project is not expected to result in the release of hazardous emissions, or hazardous materials in the vicinity of sensitive receptors. Construction of the Proposed Project will include the handling and use of hazardous substances (refer to Section 4.7.3.3), however, the utilization

and transport of these materials does not represent a significant risk to any existing schools and no impacts are anticipated.

Operation & Maintenance – No Impact

SDG&E currently maintains and operates existing electric power, distribution and substation facilities throughout the Proposed Project site, and the Proposed Project is the reconstruction of existing electric facilities within existing SDG&E ROW and substation property. SDG&E's existing facilities and operations and maintenance activities constitute the baseline against which the impacts of the Proposed Project are evaluated. Operations and maintenance activities for the Proposed Project would decrease slightly compared to baseline conditions due to the increased reliability of the new power line components included in a typical wood to steel replacement project, the installation of fewer poles along the alignment, and the relocation of poles outside of jurisdictional features. Any future potential maintenance-related construction projects would be evaluated under G.O. 131-D and CEQA for purposes of assessing whether further CPUC approval is required. Therefore, no impacts relating to the emission or handling of acutely hazardous materials or waste are anticipated.

4.7.4.5 Question 7d - 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?

Construction – 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. However, there are three active hazardous materials sites meeting the criteria outlined in Government Code Section 65962.5 near the Santa Ysabel Substation, as outlined on Table 4.7-1. Mountain Proflame Gas (LP) located at 30275 Hwy 78, is listed as an open site assessment with potential contaminants of concern listed as diesel fuel affecting soil quality. This site is classified as a Category 1 site, characterized by soil or groundwater contamination that does not pose an immediate human health threat, and does not extend off-site onto neighboring parcels. Santa Ysabel (Formerly Chevron), located at 30350 Hwy 78 is listed as a leaking underground storage tank cleanup site, with gasoline being the potential contaminant of concern. This site is listed as Category 3, which indicates a large or complex site that may have significant soil and groundwater contamination and/or threaten human health. The Santa Ysabel Old Barn Site, located at 21800 Washington Street is listed as an open site assessment, with no contaminant profile provided. This site is classified as a Category 1 site, characterized by soil or groundwater contamination that does not pose an immediate human health threat, and does not extend off-site onto neighboring parcels.

Proposed Project construction will not occur on any of these three sites such that construction would be likely to result in a significant hazard to the project, environment, or public. Therefore, no impacts are anticipated.

Operation & Maintenance – No Impact

SDG&E currently maintains and operates existing electric power, distribution and substation facilities throughout the Proposed Project site, and the Proposed Project is the reconstruction of

existing electric facilities within existing SDG&E ROW and substation property. SDG&E's existing facilities and operations and maintenance activities constitute the baseline against which the impacts of the Proposed Project are evaluated. Operations and maintenance activities for the Proposed Project would decrease slightly compared to baseline conditions due to the increased reliability of the new power line components included in a typical wood to steel replacement project, the installation of fewer poles along the alignment, and the relocation of poles outside of jurisdictional features. Any future potential maintenance-related construction projects would be evaluated under G.O. 131-D and CEQA for purposes of assessing whether further CPUC approval is required. Therefore, no impacts relating to existing hazardous materials or waste sites are anticipated.

4.7.4.6 Question 7e - 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?

Construction – No Impact

The Proposed Project is not located within an existing airport land use plan, and the closest public airport (Ramona Airport) is located approximately 3.4 miles from the Proposed Project location (refer to Section 4.7.3.7). Construction of the Proposed Project would include the utilization of light- and medium-duty 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, construction of the Proposed Project would not result in a safety hazard for people residing or working in the Proposed Project area and no impacts are anticipated.

Operation & Maintenance – No Impact

The Proposed Project is not located within an existing airport land use plan, and the closest public airport is located approximately 3.4 miles from the Proposed Project locations (refer to Section 4.7.3.7). While the Proposed Project does include the installation of vertical structures (power line poles), new poles would not be located in areas that do not already have similar structures. SDG&E determined that two poles required noticing to the FAA. The FAA conducted an aeronautical study under the provisions of 49 USC Section 44718 and Title 14 of the CFR Part 77; and determined there is no hazard to air navigation and aerial marking lights/balls are not required. As such, the Proposed Project would not result in a safety hazard for people residing or working in the Proposed Project area. Therefore, no impacts are anticipated.

4.7.4.7 Question 7f - 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?

Construction – No Impact

The Proposed Project is not located within the immediate vicinity of a private airstrip. The closest private airstrip is located approximately 1.8 miles from the Proposed Project (refer to Section 4.7.3.7). Construction of the Proposed Project would 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, construction of the Proposed Project would not result in a safety hazard for people residing in the Proposed Project area and no impacts are anticipated.

Operation & Maintenance – No Impact

The Proposed Project is not located within the immediate vicinity of a private airstrip. The closest private airstrip is located approximately 1.8 miles from the Proposed Project (refer to Section 4.7.3.7). While the Proposed Project does include the installation of vertical structures (power line poles), new poles would not be located in areas that do not already have similar structures. SDG&E determined that two poles required noticing to the FAA. The FAA conducted an aeronautical study under the provisions of 49 USC, Section 44718 and Title 14 of the CFR, Part 77; and has determined there is no hazard to air navigation and aerial marking lights/balls are not required. As such, the Proposed Project would not result in a safety hazard for people residing or working in the project area. Therefore, no impacts are anticipated.

4.7.4.8 Question 7g - Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction – Less than Significant Impact

Proposed Project construction would not restrict and would not interfere with the San Diego Operational Area Evacuation Plan, or emergency response at the State and Operational Area levels under the State Emergency Plan and the SEMS.

Construction of the Proposed Project would 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, including potential emergency response and evacuation.

Construction of the Proposed Project could involve partial closure of certain streets during construction activities. However, through access would be maintained during construction (as discussed in Section 4.14, Traffic and Transportation) and therefore impacts would be less than significant.

Operation & Maintenance – No Impact

SDG&E currently maintains and operates existing electric power, distribution and substation facilities throughout the Proposed Project site, and the Proposed Project is the reconstruction of existing electric facilities within existing SDG&E ROW and substation property. SDG&E's existing facilities and operations and maintenance activities constitute the baseline against which the impacts of the Proposed Project are evaluated. Operations and maintenance activities for the Proposed Project would decrease slightly compared to baseline conditions due to the increased reliability of the new power line components included in a typical wood to steel replacement project, the installation of fewer poles along the alignment, and the relocation of poles outside of jurisdictional features. Any future potential maintenance-related construction projects would be evaluated under G.O. 131-D and CEQA for purposes of assessing whether further CPUC

approval is required. Therefore, no impacts relating to the impairment of emergency response or evacuation plan are anticipated.

4.7.4.9 Question 7h - 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?

Construction – Less than Significant Impact

As previously described in Section 4.7.3, the power lines associated with the Proposed Project are located within the SDG&E designated Fire Threat Zone. While construction of the Proposed Project would place construction workers temporarily within the designated Fire Threat Zone, construction work would be temporary and workers would only be within each distinct construction area for a relatively short amount of time.

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. Construction of the Proposed Project, however, would not expose people or structures to significant risk of loss, injury or death involving wildland fires with implementation of SDG&E’s robust and comprehensive construction fire prevention program. Consistent with current SDG&E standard practices, SDG&E would implement fire prevention and protection BMPs, which typically include requirements for carrying emergency fire suppression equipment, conducting “tailgate meetings” that cover fire safety discussions, restrictions on smoking and idling vehicles, and construction restrictions during red flag warnings. As part of the Proposed Project SDG&E would also implement the *TL 637 Project Fire Plan* (refer to Appendix 4.7-C) to assist in safe practices to prevent fires with the Proposed Project area. 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),
- Work limitations for “high” to “extreme” fire danger days, and
- Assignment of specific “Fire Patrol” to perform monitoring and first response onsite.

In addition, the Proposed Project would be subject to the *Cleveland National Forest Fire Plan* (refer to Appendix 4.7-B) during all construction activities located within the Cleveland National Forest boundaries. The *Cleveland National Forest Fire Plan* (refer to Section 4.7.3.1) ensures that all construction activities on forest land will be completed such that fires risks are minimized.

During construction activities within the Fire Threat Zone, workers would follow the *SDG&E Fire Prevention Plan*, *Electric Standard Practice 113.1*, the *TL 637 Project Fire Plan*, and the *Cleveland National Forest Fire Plan* to ensure that the risk of a fire event during construction of the Proposed Project is minimized. The relevant portions of these four 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, any potential impacts from wildland fires would be less than significant.

Operation & Maintenance – No Impact

Operation and maintenance of the Proposed Project would not differ substantially from that of the existing facilities, except that potential fire hazards would be minimized following construction of the Proposed Project due to the fact that the power line poles that are being replaced are made of wood and the new power line poles would be made of steel and have greater clearance above the ground and existing vegetation as outlined below.

The purpose of the Proposed Project (fire hardening TL 637 through replacement of wood poles with steel poles) is specifically to minimize the risk of wildfires that exists when certain atmospheric conditions occur within geographic areas designated as fire threat areas. The Proposed Project would involve the removal of many wood poles and is therefore consistent with SDG&E's long-term plan to improve service reliability in fire-prone areas through fire hardening or other enhancements. The Proposed Project would replace existing wood pole structures with new steel pole structures, string new wire (thereby removing weak spliced locations), install only steel poles that would withstand extreme winds, increase phase spacing, and install longer polymer insulators to minimize the potential of faults caused by contamination which would improve system reliability during extreme weather conditions. With these design features, there would be reduced exposure of people or structures to loss, injury, or death involving wildland fires as compared to existing conditions. Thus, the Proposed Project would not result in any adverse impacts in this regard.

In addition, operation and maintenance of the Proposed Project would not require any additional workers than are currently required for operation and maintenance of TL 637 and the Creelman and Santa Ysabel Substations; the Proposed Project would therefore not increase the number of people exposed to potential wildland fires within the Proposed Project vicinity.

4.7.5 Project Design Features and Ordinary Construction/Operating Restrictions

4.7.5.1 Hazardous Materials

Potential impacts relating to the handling and use of hazardous materials are addressed through compliance with numerous state and federal regulations, including (but not limited to) the following:

- OSHA (specifically Section 1910.120 [Hazardous Waste Operations and Emergency Response]),
- Cal/OSHA (OSHA regulations), and
- DTSC (RCRA and HWCL).

4.7.5.2 Fire Threat and Hazards

Potential impacts relating to wildland fires during construction of the Proposed Project addressed through implementation project design features and ordinary construction/operating restrictions,

as outlined in Section 3.8, including the *TL 637 Project Fire Plan* and the *Cleveland National Forest Fire Plan* (refer to Appendices 4.7-B and 4.7-C, respectively).

4.7.6 Applicant Proposed Measures

The Proposed Project has no potentially significant impacts relating to hazards or hazardous materials; therefore, no APMs are proposed.

4.7.7 Detailed Discussion of Significant Impacts

Based on the preceding analysis, no significant impacts relating to hazards or hazardous materials are anticipated from the Proposed Project.

4.7.8 References

California Code of Regulations. 12-29-2006. Title 22, Chapter 11, Appendix X, List of Chemical Names and Common Names for Hazardous Wastes and Hazardous Materials.

California Public Utilities Commission. January 2006. *Rules for Overhead Electric Line Construction - General Order No. 95*.

Department of Toxic Substances Control. ENVIROSTOR Database. Online: <http://www.envirostor.dtsc.ca.gov/public/>. Accessed February and November, 2012.

Mountain Proflame Contamination Site Profile http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608150736.

Occupational Safety and Health Act, Part 1910 – Occupational Health and Safety Standards. Accessed at: http://www.osha.gov/pls/oshaweb/owasrch.search_form?p_doc_type=STANDARDS&p_toc_level=1&p_keyvalue=1910

Occupational Safety and Health Act, Part 1904.29 – Recording and Reporting Occupational Injuries and Illness. Accessed at: http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=12805

San Diego Gas & Electric Company. July, 2009. *Electric Standard Practice No. 113.1 – Wildland Fire Prevention and Fire Safety*.

San Diego Gas & Electric Company. December 2012. *Fire Prevention Plan*.

San Diego Gas & Electric Company. January 2013. *TL 637 Project Fire Plan*.

Santa Ysabel (formerly chevron) Contamination Site Profile http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0607302306.

Santa Ysabel Old Barn Contamination Site Profile http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608129822.

State of California Office of Emergency Services. September 2009. *State of California Emergency Plan*.

State Water Resources Control Board. 2012. Geotracker online database. Online at: <http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=ramona%2Cca>
Site Visited February and November 2012.

US Environmental Protection Agency. 2011. Comprehensive Environmental Response, Compensation and Liability Act. Accessed at: <http://www.epa.gov/superfund/policy/cerc/la.htm>