Chapter 11
Hazards and Hazardous Materials

11.1 Overview

This chapter evaluates potential impacts related to hazards and hazardous materials that may occur from the Proposed Project. Hazardous materials are chemical and non-chemical substances that can pose a threat to the environment or human health if misused or released. Hazardous materials occur in various forms and can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazardous materials can include explosives, flammable and combustible substances, poisons, radioactive materials, pesticides, petroleum products, and other materials defined as hazardous under the Resource Conservation and Recovery Act of 1976 (RCRA) in 40 Code of Federal Regulations (CFR) 261.

Potential impacts are evaluated in light of existing laws and regulations governing hazards and hazardous materials, and the existing physical environmental setting as it relates to hazards and hazardous materials, as described in Section 11.2, "Regulatory Setting," and Section 11.3, "Environmental Setting," below.

Resources used to prepare this chapter include the Phase 1 Environmental Site Assessment (ESA), included as part of the Proponent's Environmental Assessment (PEA) and applicable State and local agency websites.

11.2 Regulatory Setting

Because regulations for hazardous materials were developed over time, hazardous materials are regulated by numerous agencies whose jurisdictions and responsibilities sometimes overlap. Federal agencies that regulate hazardous materials include the U.S. Environmental Protection Agency (USEPA) and the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA). At the State level, agencies, such as the California Department of Industrial Relations, Cal/OSHA, and the California Emergency Management Agency (Cal EMA) govern the use of hazardous materials. State and local agencies often have either parallel or more stringent rules than federal agencies.

Generation, transportation, and disposal of hazardous wastes can also be regulated by different agencies. The lead federal agency is USEPA. The California Department of Toxic Substances Control (DTSC) has primary State regulatory responsibility but may delegate enforcement authority to local jurisdictions that enter into agreements with the State agency.

The following is a review of federal and State regulations that are potentially relevant to the Proposed Project. The laws and regulations described below are not all necessarily applicable to the Proposed Project, but may be provided for informational purposes.

11.2.1 Federal Laws, Regulations, and Policies

Resource Conservation and Recovery Act

The RCRA (42 U.S. Code [USC] § 6901 et seq.), as amended by the Hazardous and Solid Waste Amendments of 1984, is the primary federal law for the regulation of solid waste and hazardous waste in the United States. These laws provide for the "cradle-to-grave" regulation of hazardous wastes, including generation, transportation, treatment, storage, and disposal. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of.

The USEPA has primary responsibility for implementing RCRA, but individual states are encouraged to seek authorization to implement some or all RCRA provisions. California received authority to implement the RCRA program in August 1992. The DTSC is responsible for implementing the RCRA program in addition to California's own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, also called the Superfund Act; 42 USC § 9601 et seq.) is intended to protect the public and the environment from the effects of past hazardous waste disposal activities and new hazardous material spills. Under CERCLA, the USEPA has the authority to seek the parties responsible for hazardous materials releases and to ensure their cooperation in site remediation. CERCLA also provides federal funding (through the "Superfund") for the remediation of hazardous materials contamination. The Superfund Amendments and Reauthorization Act of 1986 (Public Law 99-499) amends some provisions of CERCLA and provides for a Community Right-to-Know program.

Spill Prevention, Control, and Countermeasure Rule

The USEPA's Spill Prevention, Control, and Countermeasure (SPCC) Rule (40 CFR Part 112) apply to facilities with a single above-ground storage tank (AST) with a storage capacity greater than 660 gallons, or multiple tanks with a combined capacity greater than 1,320 gallons. The rule includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement SPCC Plans. The SPCC rule applies to oil-filled equipment, including transformers, which store in excess of the threshold quantities of oil described above (USEPA No Date).

Occupational Safety and Health Administration

OSHA is responsible at the federal level for ensuring worker safety. OSHA sets federal standards for implementation of workplace training, exposure limits, and safety procedures for the handling of hazardous substances (as well as other hazards). OSHA regulations require blasting explosives to be stored in approved facilities as required under the applicable provisions of the Bureau of Alcohol, Tobacco, and Firearms regulations contained in 27 CFR Part 55. OSHA also establishes criteria by which each state can implement its own health and safety program.

11.2.2 State Laws, Regulations, and Policies

Safe Drinking Water and Toxic Enforcement Act of 1986 – Proposition 65

The Safe Drinking Water and Toxic Enforcement Act of 1986, more commonly known as Proposition 65, protects the State's drinking water sources from contamination with chemicals known to cause cancer, birth defects, or other reproductive harm. Proposition 65 also requires businesses to inform the public about exposure to such chemicals in the products they purchase, in their homes or workplaces, or that are released into the environment. In accordance with Proposition 65, the California Governor's Office publishes, at least annually, a list of such chemicals. The Office of Environmental Health Hazard Assessment (OEHHA), an agency under the California Environmental Protection Agency (CalEPA), is the lead agency for implementation of the Proposition 65 program. Proposition 65 is enforced through the California Attorney General's Office; however, district and city attorneys and any individual acting in the public interest may also file a lawsuit against a business alleged to be in violation of Proposition 65 regulations.

Hazardous Materials Business Plans

Hazardous materials business plans are required for businesses that handle hazardous materials in quantities equal to or greater than 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity (40 CFR Part 355, Appendix A) (Cal OES 2014). Business plans are required to include an inventory of the hazardous materials used/stored by the business, a site map, an emergency plan, and a training program for employees. In addition, business plan information is provided electronically to a statewide information management system, verified by the applicable Certified Unified Program Agencies (CUPA), and transmitted to agencies responsible for the protection of public health and safety (i.e., local fire department, hazardous material response team, and local environmental regulatory groups).

California Occupational Safety and Health Administration

Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations in California. Cal/OSHA regulations pertaining to the use of hazardous materials in the workplace (California Code of Regulations [CCR] Title 8) include requirements for safety training, availability of safety equipment, accident and illness prevention programs, warnings about exposure to hazardous substances, and preparation of emergency action and fire prevention plans. Hazard communication program regulations that are enforced by Cal/OSHA require workplaces to maintain procedures for identifying and labeling hazardous substances, inform workers about the hazards associated with hazardous substances and their handling, and prepare health and safety plans to protect workers at hazardous waste sites. Employers also must make material safety data sheets available to employees and document employee information and training programs.

California Accidental Release Prevention

The purpose of the California Accidental Release Prevention (CalARP) program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, to minimize the damage if releases do occur, and to satisfy community right-to-know laws. In accordance with this program, businesses that handle more than a threshold

quantity of regulated substance are required to develop a risk management plan (RMP). This RMP must provide a detailed analysis of potential risk factors and associated mitigation measures that can be implemented to reduce accident potential. CUPAs implement the CalARP program through review of RMPs, facility inspections, and public access to information that is not confidential or trade secret.

California Health and Safety Code, Management of Used Oil

Section 25250-25250.30 of the California Health and Safety Code specifies requirements related to management of used oil, which is typically considered a hazardous waste. These include the prohibition of the disposal of used oil by discharge to sewers, drainage systems, surface water or groundwater, or by deposit on land; and reporting requirements for transport of used oil to recycling facilities. However, Section 25250.4 identifies an exemption for "dielectric fluid removed from oil-filled electrical equipment that is filtered and replaced, onsite, at a restricted access electrical equipment area, or that is removed and filtered at a maintenance facility for reuse in electrical equipment and is managed in accordance with the applicable requirements of Part 279 (commencing with Section 279.1) of Subchapter I of Chapter 1 of Title 40 of the Code of Federal Regulations." This section clarifies that "oil-filled electrical equipment" includes, but is not limited to, transformers, circuit breakers, and capacitors.

The Unified Program

The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of six environmental and emergency response programs. CalEPA and other State agencies set the standards for their programs while local governments implement the standards. These local implementing agencies are called CUPAs. For each county, the CUPA regulates/oversees the following:

- Hazardous materials business plans;
- California accidental release prevention plans or federal risk management plans;
- The operation of underground storage tanks (USTs) and ASTs;
- Universal waste and hazardous waste generators and handlers;
- Onsite hazardous waste treatment;
- Inspections, permitting, and enforcement;
- Proposition 65 reporting; and
- Emergency response.

The CUPA for San Diego County is the County of San Diego Department of Environmental Health (County of San Diego 2016).

California Fire Code

The California Fire Code (24 CCR Part 9) establishes minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings. Chapter 33 of the Code contains requirements for fire safety during construction and demolition activities, such as development of a prefire plan in coordination with the fire chief; maintaining vehicle access for firefighting at construction sites, and requirements related to safe operation of internal combustion engine construction equipment.

CAL FIRE Wildland Fire Management

The Office of the State Fire Marshal and the California Department of Forestry and Fire Protection (CAL FIRE) administer State policies regarding wildland fire safety. Construction contractors must comply with the following requirements in the Public Resources Code during construction activities at any sites with forest-, brush-, or grass-covered land:

- Earthmoving and portable equipment with internal combustion engines must be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (Public Resources Code § 4442).
- Appropriate fire-suppression equipment must be maintained from April 1 to December 1, the highest-danger period for fires (Public Resources Code § 4428).
- On days when a burning permit is required, flammable materials must be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor must maintain the appropriate fire-suppression equipment (Public Resources Code § 4427).
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines must not be used within 25 feet of any flammable materials (Public Resources Code § 4431).

California Public Utilities Commission General Order 95: Rules for Overhead Electric Line Construction

The California Public Utilities Commission's (CPUC) General Order (G.O.) 95 specifies requirements for overhead transmission line design, construction, and maintenance, including a number of requirements to avoid or minimize potential safety hazards. These requirements include standards related to vegetation management and maintenance of minimum vegetation clearances from high-voltage lines to minimize potential fire hazard. Table 1, Case No. 14 in G.O. 95 specifies a minimum radial clearance of bare line conductors from vegetation in Extreme and Very High Fire Threat Zones in Southern California as follows: (1) 48 inches for supply conductors and supply cables from 22.5 to 300 kilovolts (kV); (2) 120 inches for supply conductors and supply cables from 300 to 550 kV.

California Highway Patrol

The California Highway Patrol, along with the California Department of Transportation (Caltrans), enforces and monitors hazardous materials and waste transportation laws and

regulations in California. These agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roads. All motor carriers and drivers involved in transportation of hazardous materials must apply for and obtain a hazardous materials transportation license from the California Highway Patrol.

11.2.3 Local Laws, Regulations, and Policies

The CPUC has exclusive jurisdiction over the siting and design of electric transmission facilities. Therefore, it is exempt from local land use and zoning regulations. However, CPUC G.O. 131-D states that in locating electric transmission facilities, the public utilities shall consult with the local agencies regarding land use matters. CPUC and NextEra Energy Transmission West, LLC (NEET West) have been in contact with applicable local agencies for the Proposed Project, and local laws and regulations are presented here for consideration of potential impacts related to hazards and hazardous materials.

San Diego County General Plan

The San Diego County General Plan (2011) guides land use decisions in the unincorporated portions of the County, and contains goals and policies related to public safety, hazardous materials, and fire hazard mitigation. Goals and policies contained in the County's General Plan related to hazards and hazardous materials and the Proposed Project include:

- **Policy 5-1.1 – 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 5-3.1 – 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 5-11.1 – 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 regulations.

Alpine Community Plan

The Alpine Community Plan is a subcomponent of the San Diego County General Plan. By law, the goals and policies contained in the Community Plan are internally consistent with those in the larger County General Plan. Goals and policies in the Alpine Community Plan related to hazards and hazardous materials of potential applicability to the Proposed Project include:

- **Chapter 8, Safety – Policy #3.** Encourage development with fire preventive development practices and fire resistant plant types.

- **Chapter 8, Safety – Policy #4.** Consider fire hazards in Alpine a serious and significant environmental impact during review of Environmental Impact Reports.

- **Chapter 8, Safety – Policy #5.** Encourage the adequate inspection and maintenance of all utilities that could pose a hazard to the Community.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The San Diego County Multi-Jurisdictional Hazard Mitigation Plan (HMP), led by the County Office of Emergency Services (OES), was a joint effort involving input from most of the jurisdictions within the County boundaries. The HMP involved a comprehensive risk assessment process, involving identification of hazards and assets, assessing vulnerability, and development of hazard profiles (County of San Diego 2010). Based on the risk assessment, the HMP develops goals, objectives, and actions for each participating jurisdiction. The goals, objectives, and actions for unincorporated San Diego County potentially applicable to the Proposed Project include the goal to reduce the possibility of damage and losses to existing assets, including people, critical facilities/infrastructure, and public facilities due to structural fire/wildfire; and to enforce standardized Defensible Space Clearance distances.

Unified San Diego County Emergency Services Organization Operational Area Emergency Plan

The Operational Area Emergency Plan is a county-wide plan covering all of the unincorporated San Diego County area and many cities within the County's boundaries. The plan describes the roles and responsibilities of County and city departments forming a comprehensive emergency management system that provides for a planned response to disaster situations. The plan lists and describes all of the hazards that San Diego County is susceptible to and identifies objectives and protocols for different functional topic areas. Of relevance to the Proposed Project, Annex K, "Logistics," of the plan identifies policies and procedures for providing and/or coordinating the provision of services, personnel, equipment, and supplies to support operations associated with natural disasters and technological perils and incidents. One of the objectives of logistics operations is to "maintain communications systems, potable water systems, electrical, sanitation, and other utility systems and services. If required, coordinate the emergency restoration of disrupted private services with public utilities" (County of San Diego OES 2010).

San Diego County Consolidated Fire Code

San Diego County's Consolidated Fire Code contains amendments to the California Fire Code, and includes the ordinances of the 16 local fire protection districts in San Diego County, including the Alpine Fire Protection District. In accordance with California Health and Safety Code Section 13869.7(a), these amendments and the standards in the Consolidated Fire Code are more stringent than the State Fire Code. Requirements in the Consolidated Fire Code include those related to fire apparatus access roadways, fire hydrant spacing, automatic fire extinguishing systems in new buildings and structures, and landscaping requirements. Section 4903 of the Code may require an applicant for a parcel map or major use permit for any property located a wildland-urban interface fire area to submit a Fire Protection Plan (FPP) as part of the approval process.

Blasting Permit

County of San Diego Ordinance No. 9044 contains requirements related to use of explosives for construction projects, and requires prospective blasters to obtain a blasting permit from the County Sheriff's Department. The permit would require issuance of written notice to all residences and businesses within specified distances from the proposed blast location; pre-

and post-blast inspection of structures within specified distances from the blast site; and notification of the applicable fire protection district prior to conducting blasting. The County Code defines minor blasting as a blasting that meets all of the following criteria: quantity of rock to be blasted does not exceed one hundred (100) cubic yards per shot, bore hole diameter does not exceed two inches (2"), hole depth does not exceed twelve feet (12'), maximum charge weight does not exceed eight (8) pounds of explosives per delay, and the initiation of each charge will be separated by at least 10 milliseconds. All blasting operations that do not meet the criteria for minor blasting are considered major blasting.

11.3 Environmental Setting

11.3.1 Potentially Affected Area

The Proposed Project would be located on an approximately 6-acre area off of Bell Bluff Truck Trail in unincorporated San Diego County, near the community of Alpine. The Project also would include a 1-mile-long transmission line underneath Bell Bluff Truck Trail connecting to the existing San Diego Gas & Electric (SDG&E) Suncrest Substation. The area is primarily undeveloped with California buckwheat scrub vegetation and oak woodland habitats in the vicinity. The nearest structures are a residential home approximately 0.6 mile to the southeast, and other low-density residential development beginning approximately 1 mile to the east. The existing SDG&E Suncrest Substation is an approximately 40-acre electrical transmission facility, located at the Project's western terminus. The existing Suncrest Substation (substation) is connected to a high-voltage (500-kV) transmission line which enters the substation from the southeast. Two 230-kV transmission lines exit the existing substation to the northwest. These facilities are part of the Sunrise Powerlink, which is a high-voltage electric transmission system that extends from roughly the Imperial Valley west to near the City of San Diego.

The closest schools to the Proposed Project (Alpine Elementary School, Boulder Oaks Elementary School, Joan MacQueen Middle School, Boulder Oaks Elementary, and Julian Charter School) are located approximately 6 miles west to northwest of the Project site in Alpine (refer to Chapter 17, *Public Services and Utilities,* for more detailed information regarding impacts to schools). The nearest major hospital to the Proposed Project is Sharp Grossmont Hospital located in El Cajon, approximately 20 miles west of the Project site. Several day care facilities exist in Alpine, as well as a daycare facility in the Sycuan area, approximately 10 miles west to southwest of the Project site. No airports or private airstrips exist within 2 miles of the Project site; however, there is a private airstrip (On the Rocks Airport-1CA6) located approximately 4 miles southwest of the Proposed Project.

11.3.2 Historical Uses

As part of its Phase 1 ESA, SWCA Environmental Consultants (SWCA), on behalf of NEET West, reviewed the history of the subject property and adjacent properties in accordance with applicable ASTM standards (SWCA 2015). This review included a review of past aerial images, the results of which are reproduced here from the Phase 1 ESA.

Table 11-1. Summary of Historical Aerial Photograph Interpretation

Date of Aerial Photograph	Observations
1953, 1963, 1975, 1989 EDR aerial photographs Various scales	The subject property and most surrounding properties appear to be vacant and undeveloped scrubland with a few dirt roads. An area adjacent to the southwest appears as if it may have been cleared for grazing. The subject property and surrounding area does not appear to have changed significantly during this time period.
1994, 1996, 2002, 2003, 2004, 2005, 2006, 2008, 2009, 2010 EDR and Google Earth aerial photographs Various scales	By 1994, the subject property and adjacent land still appear to be undeveloped and vacant. No significant changes are evident in the 1996 photograph, except that what appears to be a square-shaped residence is present on or adjacent to the north of the right-of-way, approximately 0.77 mile east of the area where the SDG&E Suncrest Substation exists today. In 2003, another structure, possibly a gate, is evident north of the right-of-way, approximately 900 feet east-northeast of the location of the proposed Static VAR compensator (SVC). No additional significant changes are evident during this time period.
2012, 2013, 2014 Google Earth aerial photographs Variable scales	By 2012, the SDG&E Suncrest Substation at the western end of the subject property has been constructed. It appears that the roadway has been improved and paved, and stormwater controls are in place along the road. A tank, probably a water tank, is present approximately 1,000 feet northeast of the substation. A smaller tank has been added approximately 0.7 mile east of the substation, north of the road. A large portion of the location of the proposed substation has been graded. In 2013, another smaller tank has been added, approximately 275 feet southeast of the large tank. The surrounding area appears to remain undeveloped and unoccupied, except as described above.

Source: SWCA 2015

Past aerial imagery shows that the Proposed Project area remained largely undeveloped until roughly 2012, when the SDG&E Suncrest Substation was built and Bell Bluff Truck Trail was improved and paved (SWCA 2015).

As described in Chapter 2, *Project Description,* during construction of the SDG&E Suncrest Substation, the proposed SVC site (i.e., former Wilson Construction Yard) was used as a construction materials storage and staging area. The area was used for storage and staging of materials, assemblage of the lattice tower segments, helicopter transport operations of materials and tower segments, and as a temporary water basin (SDG&E Undated). This use required clearing of vegetation, grading and importation of gravel and rock to the site. Following completion of the SDG&E Suncrest Substation in 2012, the Wilson Construction Yard was de-compacted by ripping and cross-ripping between 18 to 24 inches and then recontoured to a ground surface intended to duplicate its original topography.

11.3.3 Hazardous Materials

The Phase I ESA conducted for the Proposed Project, included in this draft environmental impact report (DEIR) as Appendix I, *Phase 1 Environmental Site Assessment*, included a review of federal and State environmental records for evidence of hazardous materials sites or contamination in the Project vicinity (SWCA 2015). As described in the Phase I ESA, this review included generation and review of an environmental database report (generated by Environmental Data Resources, Inc.), which identified no nearby hazardous materials sites or facilities. The Phase I ESA also included review of records from the State Water Resources Control Board's (SWRCB's) GeoTracker website, which contains environmental data for regulated facilities in California including cleanup sites and hazardous waste facilities, and DTSC's EnviroStor website, which includes data for leaking underground storage tanks, land disposal sites, and hazardous waste permitted facilities (SWCA 2015). SWCA did not identify any relevant nearby sites or facilities based on information from these sources.

Additionally, SWCA evaluated the potential for nearby contamination to migrate over time on or near the Proposed Project site, but did not identify any off-site potential sources of vapor intrusion or vapor encroachment (SWCA 2015).

The Phase I ESA also included a visual inspection of the Proposed Project site. During the visual inspection, SWCA staff did not observe any soil staining, odors, or other evidence of leaks or spills at the existing SDG&E Suncrest Substation, the proposed SVC site, or along Bell Bluff Truck Trail (SWCA 2015).

11.3.4 Fire Hazard

The Proposed Project is located within a Very High Fire Hazard Severity Zone, as defined and identified by CAL FIRE (CAL FIRE 2007). This designation indicates that the physical conditions (e.g., vegetation, topography, weather, crown fire potential, ember production and movement) create a very high likelihood that the area will burn over a 30 to 50-year time period, and potentially will burn at a high intensity and speed (CAL FIRE 2012). In general, San Diego County is subject to extreme fire danger due to a combination of physical and climatic factors. In the fall, at the height of the fire season, extreme fire weather conditions include low humidity, sustained high-speed winds, and strong gusts (NEET West 2015). Santa Ana winds are strong, extremely dry down-slope winds that originate inland and affect coastal Southern California. The Santa Ana winds typically blow from the northeast over the Peninsular Ranges, and can have sustained speeds of 40 miles per hour (mph) with gusts over 100 mph, creating extreme fire danger (NEET West 2015).

11.4 Impact Analysis

11.4.1 Methodology

For the purpose of this assessment, hazardous materials are defined as any materials that, because of quantity, concentration, or physical or chemical characteristics, pose a significant, present, or potential hazard to human health and safety or to the environment, if released. Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that a handler or the administering regulatory agency has a reasonable basis for believing would be injurious to the health and safety of persons or would be harmful to

the environment if released into the workplace or the environment (California Health and Safety Code § 25501).

Although often treated separately from hazardous materials, petroleum products (including crude oil and refined products such as fuels and lubricants) and natural gas are considered in this analysis because they might pose a potential hazard to human health and safety if released into the environment. Hazardous wastes include residues, discards, byproducts, contaminated products, or similar substances that exceed regulatory thresholds for properties of toxicity, ignitibility, corrosivity, or reactivity. Federal and state regulations identify by name the specific hazardous wastes that EPA has designated as "listed wastes."

Potential impacts related to hazards and hazardous materials that may occur from the Proposed Project are evaluated with respect to the applicable State CEQA Guidelines Appendix G significance criteria, described below. Potential impacts also are considered in light of existing federal and State laws and regulations related to hazards and hazardous materials, as well as the existing physical environment in the area of the Proposed Project, including proximity to sensitive receptors.

11.4.2 Criteria for Determining Significance

According to Appendix G of the State CEQA Guidelines, the Proposed Project would result in a significant effect related to hazards and hazardous materials if it would:

A. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

B. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

C. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile of an existing or proposed school.

D. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5, and as a result, create a significant hazard to the public or the environment.

E. Result in a safety hazard for people residing or working in the project area if the project is within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public-use airport or private airstrip.

F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

G. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Criteria Dismissed from Further Consideration

Because there are no schools within 0.25 mile of the Proposed Project, as described in Section 11.3, "Environmental Setting," significance criterion C above is not considered further. Similarly, because the Phase 1 ESA determined that no hazardous materials sites exist on or near the Project site, significance criteria D above is also dismissed from further detailed analysis. Additionally, no airports or private airstrips exist within 2 miles of the Proposed Project site. The nearest private airstrip is located approximately 4 miles southwest of the Project site. Therefore, significance criterion E is not considered further.

11.4.3 Environmental Impacts

Impact HAZ-1: Potential to Create a Significant Hazard to the Public or the Environment through the Routine Transport, Use, or Disposal of Hazardous Materials (Less than Significant with Mitigation)

Construction

Construction of the Proposed Project would involve the routine transport, use, and disposal of hazardous materials. These materials would include, but would not be limited to, diesel fuel, gasoline, lubrication oil, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, cement slurry, and, possibly, explosives for blasting activities. These materials would primarily be contained within construction equipment, but may also be stored on-site or transported to the site, and may be replenished or disposed of periodically. Installation of the transformers for the SVC facility would involve transport and handling of mineral oil[1] (each of the two transformers will require approximately 10,000 gallons of mineral oil). Routine transport, use, and disposal of hazardous materials during Project construction could potentially expose persons or the environment to hazards if adequate precautions are not taken; for example, if appropriate personal protective equipment were not worn or hazardous materials were otherwise mishandled to allow for exposure. Because the Project area is primarily undeveloped and sparsely inhabited, routine transport, use, and disposal of hazardous materials for the Proposed Project construction would be unlikely to affect the general public, but could adversely affect construction workers or the environment. Such adverse effects could include illness from exposure to toxic substances or soil or groundwater contamination from inappropriate disposal practices.

As described in Section 11.2, "Regulatory Setting," the Proposed Project would be subject to a number of existing federal and State laws and regulations related to hazardous materials, which would include protective requirements designed to limit potential impacts. In accordance with OSHA and Cal/OSHA requirements, the Proposed Project would be required to implement workplace training, safety procedures for the handling of hazardous substances, and to ensure workers are not exposed to hazardous materials above exposure limits. OSHA requirements also would require that explosives are stored in approved facilities.

In accordance with San Diego County's Unified Program, which implements a number of federal and State laws and regulations related to hazardous materials, and is administered by

[1] Mineral oil or "transformer oil" is an oil that is stable at high temperatures and has desirable electrical insulating properties. Its functions are to insulate, suppress corona and arcing, and to serve as a coolant.

the San Diego County Department of Environmental Health, the Proposed Project would be required to follow hazardous waste storage and labeling requirements and requirements for proper disposal of hazardous waste (County of San Diego 2016). The quantities of potentially hazardous materials contained in construction equipment and used during construction may be below thresholds which would trigger required preparation of a hazardous material business plan or an RMP, pursuant to the Unified Program; however, the Proposed Project would implement **Mitigation Measure HAZ-1**, requiring the preparation and implementation of a Hazardous Materials and Waste Management Plan (HMWMP). As shown below, the HMWMP would include an inventory of hazardous materials on-site; information on protocols for the safe storage, use, transport, and disposal of hazardous materials; spill response procedures, and other components designed to avoid or minimize potential impacts.

Additionally, the Proposed Project would implement **Mitigation Measure HAZ-2**, requiring preparation and implementation of a blasting plan prior to conducting any blasting activities. The blasting plan under Mitigation Measure HAZ-2 would outline the proposed safe and lawful transport, storage, and use of explosives during Project construction.

Implementation of Mitigation Measure HAZ-1 and HAZ-2, along with adherence to existing federal and State laws, would be anticipated to reduce the potential for routine transport, use, and disposal of hazardous materials to create a significant hazard to the public or the environment. This impact would be less than significant with mitigation.

Mitigation Measure HAZ-1: Hazardous Materials and Waste Management Plan.

NEET West and/or its contractor(s) shall prepare and implement a Hazardous Materials and Waste Management Plan (HMWMP). The HMWMP may include components or requirements which are part of compliance documents for other applicable federal and state hazardous materials regulations. The HMWMP shall include the following information:

- A list of hazardous materials present on-site during construction and operation, to be updated as needed along with product Safety Data Sheets and other information regarding storage, application, transportation, and disposal requirements;
- A Hazardous Materials Communication (i.e., HAZCOM) Plan;
- Assignments and responsibilities of Proposed Project Health and Safety roles;
- Standards for any secondary containment and countermeasures that will be required for hazardous materials;
- Spill response procedures based on product and quantity. The procedures shall include materials to be used, location of such materials within the Proposed Project area, and disposal protocols; and
- Protocols for the management, testing, reporting, and disposal of potentially contaminated soils or groundwater observed or discovered during construction. This will include termination of work within the area of

suspected contamination sampling by an OSHA trained individual, and testing at a certified laboratory.

A copy of the HMWMP shall be provided to the CPUC for recordkeeping prior to the start of construction. HMWMP updates shall be made and submitted as needed if construction activities change whereas the existing HMWMP does not adequately address the Proposed Project.

Mitigation Measure HAZ-2: Prepare and Implement Blasting Plan.

NEET West shall conduct a pre-blast survey, prepare a blasting plan, and obtain appropriate blasting and explosive permits prior to conducting any blasting activities during Project construction. NEET West shall submit a written report of the pre-blast survey and final blasting plan to CPUC and the County of San Diego and receive approval from that agency prior to any rock removal activity. The pre-blast survey and blasting plan shall meet the following conditions:

- The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by NEET West. Notification that blasting will occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan.

- The final blasting plan shall outline safe and lawful procedures for transport, handling, and storage of explosives. The blasting plan shall identify where on the site explosives will be stored and explain what safety precautions will be taken in transporting and handling explosives to prevent potential accidental explosions or release of hazardous materials into the environment.

- The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement.

- The final blasting plan shall identify fire-safe blasting procedures and measures to prevent possible ignition of wildfires during blasting activities.

- The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed SVC, riser pole and underground transmission line structures. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. NEET West, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.

- The blasting plan shall incorporate provisions to post signage along roads and trails within a minimum of 1000 feet of the identified blast site. Precautions such as fencing or taping will be incorporated that limit access to recreationalists and the general public.

Operation

During operation, the Proposed Project would involve relatively minimal transport, use, and disposal of hazardous waste, as the facility would be operated remotely and would only require periodic maintenance and repair activities. As described in Chapter 2, *Project Description,* no staff would be needed on site to operate the Proposed Project. NEET West anticipates that maintenance of the Proposed Project would include routine monthly inspections of the SVC equipment, as well as more thorough annual inspections and maintenance of the main SVC components. The transmission line would be inspected every 6 to 8 months. Any necessary repairs or maintenance would typically be conducted on an as-needed basis. Hazardous materials that may be stored, transported, used, or disposed of include transformer oil, solvents, and paints. Although they may be used or handled infrequently, use of these materials during maintenance and repair activities could potentially expose workers or the environment to adverse effects.

In general, the Proposed Project would be required to comply with applicable federal, State, and local laws and regulations related to hazardous materials management. As described in Section 11.2, "Regulatory Setting," use, storage, transport, and disposal of hazardous materials during Project operation would be subject to OSHA and Cal/OSHA regulations, which include requirements for the protection of worker health and safety. Because the Proposed Project would store greater than 1,320 gallons of mineral oil in the transformers (each of the two transformers would require a maximum of 10,000 to 12,000 gallons of oil), it also would likely be subject to the USEPA's SPCC rule, which requires preparation and implementation of an SPCC plan, including identification and implementation of appropriate spill containment structures and countermeasures. The requirements of the SPCC rule may be met in part by the transformer oil containment basins which are proposed as part of the Project. As described in Chapter 2, *Project Description,* the Proposed Project would include secondary containment structures designed to contain the oil volume of the transformers plus the 25-year 24-hour storm. Due to the oil contained in the transformers, the Proposed Project also may be required to prepare and implement a hazardous materials business plan and potentially an RMP, which would include a number of emergency and spill contingency-related requirements. Some of these requirements may be met or may compliment items included in the HMWMP, which would be prepared and implemented pursuant to Mitigation Measure HAZ-1.

Periodic replacement of transformer oil may be subject to applicable sections of the California Health and Safety Code related to management of used oil. Depending on whether the oil would be filtered and replaced on-site, the Proposed Project may be required to follow reporting and other requirements governing transport of oil to recycling or disposal facilities or be managed in accordance with applicable federal regulations. Either way, the routine replacement, disposal, or transport of used transformer oil would not be anticipated to create a significant hazard to the public or the environment.

Overall, given adherence to applicable laws and regulations and implementation of Mitigation Measure HAZ-1, potential impacts associated with the routine storage, use, transport, and

disposal of hazardous waste would be anticipated to be less than significant. This impact would be less than significant with mitigation.

Impact HAZ-2: Potential to Create a Significant Hazard to the Public or the Environment through Reasonably Foreseeable Upset and Accident Conditions (Less than Significant with Mitigation)

Construction

As described under Impact HAZ-1 above, construction of the Proposed Project would involve use, transport, storage, and disposal of hazardous materials, including, but not limited to, diesel fuel, gasoline, lubrication oil, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, and cement slurry, and, possibly, explosives for blasting activities. These materials would primarily be contained within construction equipment, but may also be stored on-site and/or transported to and from the site. Use of these materials would have the potential to result in accidental spills that could release hazardous materials into the environment. Such potential releases could harm plants, soil-dwelling microorganisms, or contaminate groundwater rendering it unfit for designated beneficial uses. Accidental detonation of explosives could pose a safety hazard to workers or wildlife in the area. Because the Project area is relatively undeveloped and sparsely populated, potential releases of hazardous materials due to upset or accident conditions would be unlikely to affect the general public, but may create a hazard to construction workers present on-site during construction.

Numerous federal, State, and local laws and regulations relate to hazardous materials management. In general, the Proposed Project would be required to handle, store, use, transport, and dispose of hazardous materials in accordance with applicable federal, state, and local laws. The Proposed Project also would implement Mitigation Measure HAZ-1, which would require preparation and implementation of a HMWMP. The HMWMP would include a number of measures designed to prevent or minimize the effects of potential releases of hazardous materials, including maintaining an inventory of hazardous materials present on-site during construction, a HAZCOM plan, spill response procedures, and standards for secondary containment and countermeasures in the event of a spill.

Additionally, Mitigation Measure HAZ-2 would be implemented to ensure that appropriate safety procedures are in place for the storage, transport, and handling of explosives during Project construction.

Given implementation of Mitigation Measure HAZ-1 and HAZ-2, accidental releases of hazardous materials during construction of the Proposed Project would be unlikely to occur, and should they occur, potential impacts on the public or the environment would be minimized. Therefore, this impact would be less than significant with mitigation.

Operation

As described under Impact HAZ-1 above, the Proposed Project would involve only infrequent handling, use, transport, and disposal of hazardous materials. In general, the Proposed Project would be operated remotely and no staff would typically be needed on-site. Hazardous materials would be used or handled infrequently during routine maintenance and repair activities or during replacement of transformer oil. Hazardous materials that may be used during Project operation include paints, solvents, used transformer oil, or similar

substances. Although they may be used infrequently, these materials would have the potential to create a significant hazard to workers or the environment if they were to spill or be released through upset or accident conditions.

The Proposed Project would involve on-site storage of mineral oil or transformer oil, which is a petroleum product and considered a hazardous material for the purposes of this analysis. Each of the two proposed transformers would require a maximum of 10,000 to 12,000 gallons of mineral oil. If the containing structures were to leak or fail (e.g., during a seismic event), without adequate secondary containment structures, the oil may be released into the environment. Because the Project site and surrounding vicinity is relatively undeveloped and sparsely populated, such a release would be unlikely to directly affect members of the general public, but it could adversely affect workers should they happen to be present in the environment. If the oil were released outside the footprint of the SVC, it could contaminate the surrounding soil and potentially be transported to nearby water bodies or percolate down to the groundwater, though this is considered unlikely given the dense rock underlying the Project site.

The Proposed Project would be required to follow all applicable laws and regulations related to hazardous materials and waste. These may include OSHA and Cal/OSHA regulations, the USEPA's SPCC rule, and applicable Unified Program requirements. The SPCC rule includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines, and may be applicable to the Proposed Project's storage of oil in transformers. These requirements may be met in part by the transformer oil containment basins which are proposed as part of the Project. These secondary containment structures would be designed to contain the oil volume of the transformers plus the 25-year 24-hour storm, and would be anticipated to prevent any oil from being discharged to the surrounding environment in the event of a rupture of the primary containment structure, such as during a seismic event.

The Proposed Project also may be required to prepare and implement a hazardous materials business plan and potentially an RMP, which would include a number of emergency and spill contingency-related requirements. Some of these requirements may be met or may compliment items included in the HMWMP, which would be prepared and implemented pursuant to Mitigation Measure HAZ-1. As described above, Mitigation Measure HAZ-1 would include an inventory of hazardous materials present on-site during operation, a HAZCOM plan, spill response procedures, and standards for secondary containment and countermeasures in the event of a spill.

Overall, with adherence to applicable laws and regulations pertaining to hazardous materials and implementation of Mitigation Measure HAZ-1, the potential for the Project to create a significant hazard to the public or environment through upset or accident conditions would be anticipated to be less than significant. This impact would be less than significant with mitigation.

Impact HAZ-3: Impair Implementation of or Physically Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan (Less than Significant with Mitigation)

Construction

Construction of the Proposed Project would involve operation and temporary storage of large construction equipment, excavation and hauling of excavated material, transportation and storage of construction materials (e.g., conduit, conductor cables, electrical/SVC equipment, etc.), and trenching within Bell Bluff Truck Trail. All of these activities would have the potential to disrupt traffic flow along the two-lane Bell Bluff Truck Trail and potentially impede emergency response vehicles and/or evacuation procedures. The presence of large construction equipment and haul trucks on local roadways could potentially impede movement and access of emergency response vehicles or interfere with evacuation procedures. Because Bell Bluff Truck Trail is a private, secured roadway in the area of the Proposed Project, such construction activities would be unlikely to substantially affect the general public but could affect emergency access to and from the existing SDG&E Suncrest Substation and associated high-voltage transmission lines. If trenching activities along Bell Bluff Truck Trail were to block vehicle traffic and prevent access to the existing substation or transmission lines by emergency personnel, it could result in a significant impact. Prompt access to the existing facilities may be necessary to prevent property damage or risks to life safety in the event of a fire or other emergency associated with the SDG&E Suncrest Substation.

As described in Chapter 19, *Transportation and Traffic,* the Proposed Project would implement **Mitigation Measures TR-1** and **TR-2** to minimize potential impacts associated with haul truck and heavy equipment traffic and temporary roadway disturbances caused by the Proposed Project. Mitigation Measure TR-1 would require that NEET West and/or its contractor(s) conduct work in such a way as to maintain two-way traffic flow on roadways in the vicinity of the work site, to the extent feasible, and to prohibit heavy equipment and haul traffic in residential areas. Mitigation Measure TR-2 would require that NEET West and/or its contractor(s) prepare and implement a Traffic Control Plan (TCP) to describe procedures to guide traffic, safeguard construction workers, provide safe passage of traffic, and minimize traffic impacts, as necessary, through the duration of construction. Additionally, the Proposed Project would implement **Mitigation Measure TR-3** to require that NEET West and/or its contractor(s) coordinate with local emergency service providers to ensure that emergency vehicle access and response is not impeded in the event work is conducted on roads with the potential to affect traffic flow.

With implementation of the mitigation measures described above, construction of the Proposed Project would not be anticipated to substantially interfere with emergency response or evacuation procedures in the area of the existing SDG&E Suncrest Substation and surrounding Project vicinity. Given the Proposed Project's location along a private road in a remote and relatively unpopulated area of San Diego County, its' construction would not be likely to impede or interfere with implementation of regional emergency response or evacuation plans, such as the *Unified San Diego County Emergency Service Organization Operational Area Emergency Plan.* Therefore, this impact would be less than significant with mitigation.

Operation

The Proposed Project would be operated remotely and no staff would typically be on-site during Project operation. Following construction, Bell Bluff Truck Trail would be restored to pre-project conditions and no structures or equipment would interfere with vehicle movement. Therefore, the Proposed Project would not affect emergency response or evacuation related to the existing SDG&E Suncrest Substation or surrounding area.

Once operational, the Proposed Project will represent a key piece of infrastructure for the regional transmission system. As described in Section 11.2, "Regulatory Setting," one of the objectives of the *Unified San Diego County Emergency Services Organization Operational Area Emergency Plan* is to maintain key utility systems and services, and, if required, coordinate the emergency restoration of disrupted private services with public utilities (County of San Diego OES 2010). In this regard, the Proposed Project would be another piece of utility infrastructure that would need to be accounted for and potentially restored in the event of an emergency or disaster. There is no reason to believe this would place an undue burden on emergency response personnel or impede the implementation of existing emergency response and evacuation plans. Overall, this impact would be less than significant.

Impact HAZ-4: 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 with Mitigation)

Construction

During construction, the Proposed Project would involve use of combustion-engine construction equipment, as well as storage of potentially flammable materials, such fuel or lubricating oil. Project construction also may involve use of explosives during blasting activities. These activities could potentially provide a spark or ignition source, or introduce materials that could combust or burn at high intensity if exposed to a heat source. The Proposed Project site is located in an area classified as a Very High Fire Hazard Severity Zone by CAL FIRE due to its physical, climatic, and topographic factors. Therefore, use of combustion-engine and/or spark-generating construction equipment, and use or storage of flammable materials, in this area for Project construction may increase the risk of initiating a wildland fire.

Although the Proposed Project is located in a relatively undeveloped and sparsely inhabited area of San Diego County, a wildland fire in this area could be devastating, potentially leading to high loss of property and life. This is especially true if it were to occur during the period of Santa Ana winds when it would be difficult for firefighting personnel to control its spread. Some of the largest and most destructive fires in California's history (e.g., Cedar Fire [273,246 acres burned], Laguna Fire [175,425 acres burned]) have occurred in the general vicinity of the Proposed Project, and history has shown that wildfires started in this region can spread extremely quickly and over great distances (CAL FIRE 2016).

To reduce the potential for wildfire risk during construction, the Proposed Project would implement a Construction Fire Prevention Plan (CFPP), as described below in **Mitigation Measure HAZ-3.** The CFPP would identify fire prevention measures that would be employed

during the construction phase, identifying potential sources of ignition and detailing the measures, equipment, and training that will be provided to all site contractors (Dudek 2016). Basic topics to be addressed in the CFPP include fire risk mitigation measures, fuel modification at construction sites, fire patrols, mufflers and spark arrestors on equipment engines, and storage of flammable and combustible liquids and fueling of vehicles and equipment (Dudek 2016).

Additionally, the Proposed Project would be subject to applicable sections of the Public Resources Code related to prevention of wildland fires and the California Fire Code (see Section 11.2, "Regulatory Setting"). The Proposed Project also would implement **Mitigation Measure HAZ-4**, which would require implementation of a number of BMPs related to fire safety during construction.

Additionally, the Proposed Project would implement Mitigation Measure HAZ-2, which would require preparation and implementation of a blasting plan, which would include fire-safe blasting procedures and measures to prevent the possible ignition of a wildfire from use of explosives.

Implementation of the measures described above and compliance with applicable laws and regulations would be anticipated to reduce potential for the Project construction activities to initiate a wildland fire. The location of the Proposed Project in an area susceptible to wildfire could expose construction workers and equipment to risk of loss due to wildland fire, but given the temporary nature of construction (11-month construction period) this would not be considered a likely occurrence. Overall, this impact would be less than significant with mitigation.

Mitigation Measure HAZ-3: Prepare and Implement a Construction Fire Prevention Plan.

NEET West and/or its contractor(s) shall prepare and implement the Project's Construction Fire Prevention Plan (CFPP) in accordance with applicable sections of the San Diego County Consolidated Fire Code. The document will address fire prevention measures that will be employed during the construction phase, identifying potential sources of ignition and detailing the measures, equipment, and training that will be provided to all site contractors. The CFPP shall be prepared, reviewed, and approved by the San Diego County Fire Authority (SDCFA) and CAL FIRE a minimum of 45 days prior to commencement of construction activities.

Mitigation Measure HAZ-4: Fire Safe Working Conditions and Best Management Practices.

NEET West and/or its contractor(s) shall implement the following measures during construction and operation to reduce the potential for ignitions and minimize fire-related hazards (these measures may be included in the CFPP, as appropriate):

- All work vehicles will be required to carry fire suppression equipment. Workers will be trained in the use of equipment for incipient stage fire suppression.

- Smoking will be confined to vehicles or approved smoking areas where fire suppression equipment and appropriate disposal facilities are present. All smoking materials will be disposed of in appropriate disposal bins.
- All on-road vehicle parking will be restricted to paved or graveled surfaces unless parking is required during an emergency or required for worker safety.
- Require spark arrestors on all off-road equipment.
- Restrict work activities during Red Flag Warnings issued by the National Weather Service to the extent possible. Where it is not possible to stop or restrict work activities due to safety or time sensitive activities, work activities will be limited to those needed to complete the current task and establish safe working conditions. During Red Flag Warnings, a crew member will be assigned to fire watch for each separate and distinct active work area.
- Weather and fire danger will be monitored on a daily basis.
- Fire suppression equipment such as backpack water pumps or water buffaloes will be kept on-site at a minimum of 50 feet from each separate and distinct active work area.

Operation

During operation, the Proposed Project would not involve activities that would be anticipated to create wildfire risk. Project operation may involve routine maintenance and repair activities involving use of internal-combustion engine construction equipment or flammable materials, but these activities would primarily be conducted within the fence line of the SVC and other paved areas.

Because the Proposed Project would be operated remotely with no staff typically present on-site and would not include any residential uses, a wildfire in the area would be unlikely to expose people to injury or death due to their presence on the Project site.

A wildfire in the area could damage the proposed SVC or transmission line, which could potentially result in substantial losses to the facilities and transmission system.

NEET West has prepared an FPP (Appendix K, Fire *Protection Plan*), which is separate from the CFPP that would be prepared for Project construction. This document was prepared in coordination with the SDCFA, and it evaluates potential impacts associated with wildland fire hazard. The FPP modeled anticipated fire behavior based on fuel load, vegetation type, climate, topography, and other factors, and evaluated potential risk to Project facilities. The FPP prescribes defensible space[2] requirements of up to at least 84 feet and up to 144 feet of modified natural fuels in all directions from site equipment (Dudek 2016). The defensible space prescribed in the FPP would be accomplished by removing or maintaining natural fuels/vegetation to a height of no more than 6 inches. Any planting used in the defensible space would be required to consist of low-growing ground cover selected from the SDCFA

[2] Defensible space (sometimes called "firescaping"), in the context of fire control, is the natural and landscaped area around a structure that has been maintained and designed to reduce fire danger.

desirable plant list (Dudek 2016). The FPP also recommends firefighters receive training in advance of Project implementation regarding firefighting at energized facilities and potential transformer oil fires. **Mitigation Measure HAZ-5** would require implementation of all of the requirements and recommendations contained in the FPP**.**

In addition to the requirements in the FPP related to the SVC facility design and operation, the Proposed Project would be subject to applicable laws and regulations related to overhead transmission lines and riser poles. CPUC G.O. 95 specifies minimum clearances for overhead electric lines for fire safety. The minimum clearance from vegetation for lines operating at 100 to 300,000 volts (the Proposed Project's overhead transmission line would operate at 230,000 volts [i.e., 230 kV]) in Extreme and Very High Fire Threat Zones in Southern California is 48 inches. Additionally, firebreak clearances may be applicable surrounding the proposed riser pole in accordance with PRC Section 4292. These regulations would serve to reduce potential fire risk caused by the Proposed Project, as well as minimize potential damage to Project facilities or fire spread or intensification should a wildfire occur in the area.

With implementation of Mitigation Measure HAZ-5 and adherence to applicable laws and regulations, the potential for the Proposed Project to expose people or structures to significant risk of loss, injury, or death due to wildland fire would be anticipated to be less than significant with mitigation.

Mitigation Measure HAZ-5: Follow Operational Requirements and Recommendations Identified in the Fire Protection Plan.

NEET West and/or its contractor(s) shall follow all of the requirements and recommendations contained in the FPP prepared for the Proposed Project by Dudek, dated June 2016. These requirements include, but are not limited to, design and implementation of defensible space around the proposed SVC facility according to the parameters described in the FPP; conducting training sessions with local fire station personnel and providing technical support to fire personnel regarding electrical fires and firefighting at energized facilities; appropriate design of driveways and access roads to allow for safe and efficient fire personnel and equipment access; development and implementation of appropriate protocols for de-energizing the proposed facilities; inclusion of a 10,000-gallon water storage tank accessible to firefighters at the SVC site, and arrangement of electrical equipment on the SVC site to maintain adequate setbacks from vegetated areas..