2.5 Hazards and Hazardous Materials

This section evaluates existing conditions for hazardous materials, airports, wildland fire potential, emergency response and evacuation plans, and vectors within the County, relative to the Project site addressed in this SEIR, and the potential effects that implementation of the proposed Project may have on these conditions. Analysis in this section is based, in part, on the results of the *Phase I Site Assessment*, prepared by SCS Engineers (July 24, 2015), included within Appendix M of this SEIR, the *Phase II Soil Sampling*, prepared by SCS Engineers (March 2, 2016), included within Appendix N of this SEIR; and the *Fire Protection Plan*, prepared by Jensen Hughes (October 19, 2015), included within Appendix H of this SEIR.

2.5.1 Existing Conditions

2.5.1.1 *Environmental Setting*

Hazardous Materials

The Project site is characterized by a mixture of reclaimed agricultural fields mainly to the south and west, a central mesa area, and hillslopes descending into Johnson Canyon to the north. The reclaimed agricultural fields are characterized by gently rolling topography with low-lying grasses, forbs, and shrubs. Minor surface debris is scattered throughout these areas and consists mainly of tires and rusted, abandoned equipment, and construction waste. Historical aerial photographs show that these areas had agricultural activities for varying durations between 1953 and 1989. The agricultural activity is interpreted to have taken place at the time when organochlorine pesticides such as dichlorodiphenyltrichloroethane (DDT), chlordane, and metal-based pesticides, such as arsenic, were in general use for pest control. The central mesa portion of the Project site is characterized by hummocky terrain in rolling grasslands. This area does not appear to have ever been developed with agricultural uses. The northern hillslopes are characterized by moderate to steep slopes with grasses and forbs descending into Johnson Canyon to the north and northeast. Several all-terrain vehicle trails are located in this portion of the site. Several soil berms occur throughout the Project site. Soils imported from off-site may have been used to create portions of the on-site berms.

Fire Protection and Emergency Response

The proposed site is typical of a Mediterranean climate. The summers are dry and warm with average high temperatures of 92 degrees Fahrenheit and average humidity levels at 73 percent. The area receives rainfall in the winter that occurs between December and March. The prevailing wind is an onshore flow with gusts of 20 mph. Santa Ana winds occur in the fall from the east that may gust to greater than 50 mph and humidity can fall below 10 percent.

Relative to the potential for wildland fires, the existing fuel load is consistent across the Project site. The fuel load consists of native grass and shrubs, dominated by native grasses

up to approximately three feet in height and smaller trees and shrubs up to eight feet in height. A lower valley topography occurs to the northeast of the Project site with slopes averaging approximately 20 percent vegetated in native grasses. The bottom of the valley consists of a dry wash with intermittent shrubs and small trees in the bottom area.

A portion of the proposed project is located within the Very High Fire Hazard Severity Zone (VHFHSZ) created by the City of San Diego Fire-Rescue Department, Figure 2.5- 1, *City of San Diego Very High Fire Hazard Severity Zone Map*, shows the location of the project relative to the VHFHSZ. The majority of the site is located within the High Fire Hazard Severity Zone (HFHSZ) in the State Responsibility Area (SRA). (See Figure 2.5-2. *Fire Hazard Severity Zones*.)

The Project site would be served by the San Diego Rural Fire Department. The San Diego Rural Fire Protection District serves approximately 26,500 people living in an area of 720 square miles and operate out of 14 stations that protect a primarily rural area. Located just to the east of the City of San Diego with the southern boundaries being the City of San Diego itself and approximately 50 miles of the Country of Mexico. The District is an all risk agency and works closely with CALFIRE, the United States Forest Service, United States Fish and Wildlife Service, US Bureau of Land Management, San Diego County Sheriff's Department, California Fish and Wildlife, as well as auto and mutual aid fire agencies bordering our Fire District. Additionally, the San Diego County Fire District, in conjunction with CAL FIRE and the San Diego Sheriff, would provide full-time fire and emergency medical services to the Project area.

Airport Safety

The Brown Field Airport is located approximately one mile west of the site, north of Otay Mesa Road and generally between Heritage Road and Lonestar Road within the City of San Diego. Brown Field functions as a general aviation airport and reliever airport for the San Diego International Airport. The Project site is located within Review Area 1 of Brown Field Municipal Airport. (See Figure 2.5-3, *Brown Field Airport Influence Area.*) The western portion of the Project site is located within three safety zones for Brown Field: Zone 2: Inner Approach/Departure Zone, Zone 4: Outer Approach/Departure Zone, and Zone 6: Traffic Pattern Zone. (See Figure 2.5-4, *Brown Field Airport Safety Zones.*)

Vectors

As with any rural area, the Project site has the potential to harbor vectors – an animal or insect capable of transmitting the causative agent of human disease. Some examples of vectors in San Diego County are mosquitoes, ticks, and rodents.

The San Diego County Vector Control Program (VCP), a branch within the Department of Environmental Health (DEH), is responsible for developing and conducting programs for the prevention and control of vectors; surveillance of vectors and vector-borne diseases; coordinating and conducting emergency vector control, as required; training and certifying government agency vector control technicians, and disseminating information to the public regarding protection from vectors and vector-borne diseases.

The VCP monitors vectors and the diseases that they carry. The VCP has been reducing and controlling mosquitoes since the 1930's.

2.5.1.2 Methodology

A Phase I Environmental Assessment was conducted for the proposed Project by SCS~~s~~ Engineers. This Assessment focused on potential sources of hazardous substances and petroleum products that could be considered either a recognized environmental condition,[1] controlled recognized environmental condition[2], or historical recognized environmental condition[3], and potentially a liability due to their presence in significant concentrations (e.g., above acceptable limits set by the federal, state, or local government) or due to the potential for exposure and risk due to contaminant migration and complete exposure pathways (e.g., soil vapor inhalation or groundwater ingestion). Materials that contain substances that are not currently deemed hazardous by the EPA or the California Environmental Protection Agency were not considered as part of this Assessment. Hazardous substances occurring naturally in plants, soils, and rocks (e.g., heavy metals, naturally occurring asbestos, and radon) are not typically considered in these investigations. Similarly, construction debris (e.g., discarded concrete, asphalt) is not considered, unless obvious indications suggest that hazardous substances are likely to be present in significant concentrations or likely to migrate.

SCS personnel conducted a Site reconnaissance on July 16, 2015, to observe and document existing Site conditions. Site research for the Project included records searches of the September 2010 DEH HE-17 database of facilities storing hazardous materials, generating hazardous wastes, and discharging unauthorized releases, review of the SWRCB Geotracker Website, California Division of Oil and Gas (CDOG) map, and interview with past and present owners and occupants of the Project site. The assessment also included historical site research of aerial photographs, City directories, Sanborn fire insurance and maps. Site vicinity research was also conducted for those properties judged to be adjacent to the Project site by SCS. Lastly, a Radius Map was prepared by Environmental Date Resources (EDR) for the Project site.

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1 *Recognized environmental conditions*, as defined by ASTM, include the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. However, the term is not intended to include *de minimis* conditions (a condition that generally does not present a threat to human health or the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies). A condition considered de minimis is not a recognized environmental condition.

2 *Controlled recognized environmental condition*, as defined by ASTM, is a *recognized environmental condition* resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity use limitations, institutional controls, or engineering controls).

3 *Historical recognized environmental condition,* as defined by ASTM, is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

The Fire Protection Plan (FPP) was prepared for the Project to identify and prioritize areas for hazardous fuel reduction treatments and to recommend the types and method of treatment and measures that a property owner would take to reduce the probability of ignition of structures throughout the Project site. Information from this report was utilized to determine the risk of wildfires of the Project site. The Unified San Diego County Emergency Services Organizational Area Emergency Plan and the Brown Field ALUCP were consulted regarding information for emergency response and airport safety. The County's Guidelines for Determining Significance were then consulted to determine where significant impacts may occur.

2.5.1.3 *Regulatory Framework*

Federal

Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984

Federal hazardous waste laws are generally stated under RCRA. These laws provide for the "cradle to grave" regulation of hazardous wastes. 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.

U.S. Environmental Protection Agency Region 9, Preliminary Remediation Goals

Region 9 is the Pacific Southwest Division of the EPA, which includes California. Preliminary remediation goals (PRGs) are tools for evaluating and cleaning up contaminated sites. PRGs for the Superfund/RCRA programs are risk-based concentrations, derived from standardized equations combining exposure information assumptions with EPA toxicity data. They are considered to be protective for humans (including sensitive groups) over a lifetime. However, PRGs are not always applicable to a particular site and do not address non-human health issues such as ecological impacts. Region 9's PRGs are viewed as agency guidelines, not legally enforceable standards.

State

Public Utilities Code §21670, Aeronautics Act

Requirements for creation of Airport Land Use Commissions (ALUCs) were first established in 1967 under the California State Aeronautics Act (Pub. Util. Code §21670 *et seq*.). Although the law has been amended numerous times since its enactment, the fundamental purpose of ALUCs has remained unchanged. The ALUC has the responsibility to "assist local agencies in ensuring compatible land uses in the vicinity of ... airports to the extent that the land in the vicinity of those airports is not already devoted to incompatible uses..." The ALUC is also empowered to "coordinate planning at the state, regional, and local levels so as to provide for the orderly development of air transportation, while at the same time protecting the public health, safety, and welfare"

(Pub. Util. Code §21674).

The law defines the powers and duties of ALUCs in terms that parallel the ALUC's purpose:

- To assist local agencies in ensuring compatible land uses in the vicinity of airports to the extent that land is not already devoted to incompatible uses.
- To prepare and adopt an airport land use compatibility plan for each airport within its jurisdiction.
- To review the plans, regulations, and certain other actions of local agencies and airport operators for consistency with that plan.
- To coordinate planning at the state, regional and local levels, so as to provide for the orderly development of air transportation, while at the same time protecting the public health, safety and welfare (Pub. Util. Code §21674).

Government Code Section 65962.5(a), Cortese List

The Hazardous Waste and Substance Sites Cortese List is a planning document used by the state, local agencies and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the CalEPA to develop at least annually an updated Cortese List. The California Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

California Health & Safety Code, Hazardous Materials Release Response Plans and Inventory

Two programs found in the California Health & Safety Code (H&SC) Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Program and the California Accidental Release Program (CalARP). The County's DEH is responsible for the implementation of the Hazardous Materials Business Program and CalARP in San Diego County.

Hazardous Materials Business Plans

Article 1 of Chapter 6.95 of the California Health and Safety Code (Sections 25500–25520) requires that any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs. An HMBP includes three sections: (1) an inventory of hazardous materials, including a site map, which details their location;

(2) an emergency response plan; and (3) an employee-training program. HMBPs serve as an aid to employers and employees in managing emergencies at a given facility. They also help better prepare emergency response personnel for handling a wide range of emergencies that might occur at the facility.

HMBPs are submitted to the Department of Environmental Health Hazardous Materials Division. The plans must be resubmitted, reviewed, revised, or amended as necessary every year. The HMBP must also be amended within 30 days whenever there are changes in the amount or location of stored hazardous chemicals on a site. The Hazardous Materials Division conducts routine inspections at businesses required to submit business plans. The purpose of these inspections is to (1) ensure compliance with existing laws and regulations concerning HMBP requirements; (2) identify existing safety hazards that could cause or contribute to an accidental spill or release; and (3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials. After initial submission of an HMBP, the business must review and recertify the HMBP every year.

Risk Management Plans

Article 2 of Chapter 6.95 of the California Health and Safety Code (Sections 25531–25543.3) requires the owner or operator of a stationary source (non-transportation) with more than a threshold quantity of a regulated substance to prepare a risk management plan (RMP). The state statutes and regulations combine federal and state program requirements for the prevention of accidental releases of listed substances into the atmosphere. The incorporation of the federal and state requirements have been designated the CalARP program. CalARP requires that a risk management plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan. The risk management plan must be revised every 5 years or as necessary. The majority of facilities or businesses in the County that have prepared risk management plans are ammonia refrigeration facilities, water treatment and wastewater treatment plants that handle chlorine gas and facilities that store flammable chemicals such as methane and propane.

Hazard Assessment Program

The Hazard Assessment Program identifies regulated substances and quantities on-site, includes a five-year accident history, and assesses a worst-case release scenario analysis (based on realistic parameters). The main purpose of the release scenario analysis is to identify vulnerable public receptors, such as residences, schools, child day care facilities, hospitals, businesses, prisons, and other facilities, as well as vulnerable environmental receptors, such as wildlife preserves, parks, and other natural areas. The analysis identifies the scope and needs of the vulnerable receptors in order to plan for a community response to accidents. Worst-case scenarios assume the total quantity of the regulated substance is quickly released, atmospheric conditions will maximize the effect of the event, and no mitigation or response actions are taken. Worst-case scenarios can predict long distance effects that represent a highly unlikely chain of events.

Alternative release scenarios are based on more credible and predicable factors. The scenario can assume, for example, that mitigation measures operate as designed and atmospheric conditions are typical, rather than worst-case.

Accidental Release Prevention Program

In addition to requiring facilities to identify and assess hazards, CalARP requires facilities to develop accident prevention programs. RMPs management plans must contain summary information about major hazards identified, safety features and process controls to prevent releases, mitigation systems (e.g., dikes, shut-off valves, scrubbers) used to lessen the effect of any release, monitoring and detection systems, worker training, and maintenance records. Facilities must also include a summary of their five-year accident history for relevant chemical processes. The frequency and extent of past releases provides a measure of the facilities effectiveness in controlling chemical hazards.

Emergency Response Plan

The RMP must also describe emergency response procedures that are in place in the event of a release of a regulated substance. The emergency response plan must detail the actions taken by employees and other individuals on-site over the entire course of the release event. It must address the alarm system; the evacuation, assembly, and return procedures; emergency first aid; and the use of response equipment and personnel cleanup and decontamination procedures. The emergency response plan must describe the type of off-site response assistance that will be needed in the event of a release, including firefighting, security, and public notification.

California Health & Safety Code, Vector Control

Sections 116110 through 116112 of the California H&SC establishes mosquito abatement and vector control districts, which are charged to protect Californians and their communities against the threats of vector borne diseases. Locally, this is the San Diego County Vector Control Program, a branch within the DEH. These districts are responsible for developing and conducting programs for the prevention and control of vectors; surveillance of vectors and vector-borne diseases; coordinating and conducting emergency vector control, as required; training and certifying government agency vector control technicians, and disseminating information to the public regarding protection from vectors and vector-borne diseases.

Title 14 Division 1.5 of the California Code of Regulations

CCR Title 14 Division 1.5 establishes the regulations for the California Department of Forestry and Fire Protection (CAL FIRE) and is applicable in all SRAs where CAL FIRE is responsible for wildfire protection. Most of the unincorporated area of San Diego County is an SRA, and any development in these areas must comply with these regulations. Among other things, Title 14 establishes minimum standards for emergency access, fuel modification, setback to property line, signage, and water supply.

Title 22 of the California Code of Regulations & Hazardous Waste Control Law, Chapter 6.5

DTSC is responsible for implementing the RCRA program as well as California's own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. Under the Certified Unified Program Agency (CUPA) program, Cal EPA has in turn delegated enforcement authority to the County of San Diego for State law regulating hazardous waste producers or generators. The DTSC regulates the generation, transportation, treatment, storage and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Like RCRA, Title 22 imposes "cradle to grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. Cal EPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other CUPAs, including the County of San Diego DEH.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs) or "Chisels" are concentrations of 54 hazardous chemicals in soil or soil gas that Cal EPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of Cal EPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and Cal EPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial or industrial sites.

Emergency Response to Hazardous Materials Incidents

California has developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local government, and private agencies. The plan is administered by the California Emergency Management Agency (Cal EMA) and includes responses to hazardous materials incidents. Cal EMA coordinates the response of other agencies, including Cal EPA, California Highway Patrol (CHP), CDFW, RWQCB, SDAPCD, the City of San Diego Fire Department, and the DEH Hazardous Incident Response Team (HIRT).

Local

Brown Field Municipal Airport Land Use Compatibility Plan

The basic function of airport land use compatibility plans (ALUCP) is to promote compatibility between airports and the land uses that surround them "to the extent that these areas are not already devoted to incompatible uses" (Pub. Util. Code §21674(a)).

With limited exception, California law requires preparation of compatibility plans for each public-use and military airport in the state. Most counties have established an ALUC, as provided for by law, to prepare compatibility plans for the airports in that county and to review land use plans, development proposals, and certain airport development plans for consistency with the compatibility plans. In San Diego County, the ALUC function rests with the Board of the San Diego County Regional Airport Authority (SDCRAA), in accordance with section 21670.3 of the California Public Utilities Code.

The Brown Field ALUCP (County of San Diego Airport Land Use Commission 2010) is the fundamental tool used by the SDCRAA, acting in its capacity as the San Diego County ALUC, in fulfilling its purpose of promoting airport land use compatibility. Specifically, the ALUCP: (1) provides for the orderly growth of the Airport and the area surrounding the Airport; and (2) safeguards the general welfare of the inhabitants within the vicinity of the Airport and the public in general (Pub. Util. Code §21675(a)). In essence, the ALUCP serves as a tool for the ALUC to use in fulfilling its duty to review land use plans and development proposals within the Airport Influence Area (AIA) at the Airport. In addition, the ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans and to landowners in their design of new development.

County of San Diego, Site Assessment and Mitigation Program

The County of San Diego DEH maintains the Site Assessment and Mitigation (SAM) list of contaminated sites that have previously or are currently undergoing environmental investigations or remedial actions. San Diego County SAM Program, within the Land and Water Quality Division of the DEH, has a primary purpose to protect human health, water resources, and the environment within San Diego County by providing oversight of assessments and cleanups in accordance with the California H&SC and the CCR. The SAM's Voluntary Assistance Program (VAP) also provides staff consultation, project oversight, and technical or environmental report evaluation and concurrence (when appropriate) on projects pertaining to properties contaminated with hazardous substances.

County of San Diego, Underground Storage Tank Program

The underground storage tank monitoring and response program is required under Chapter 6.7 of the California Health and Safety Code and Title 23 of the California Code of Regulations. The program was developed to ensure that the facilities meet regulatory requirements for design, monitoring, maintenance, and emergency response in operating or owning underground storage tanks. The DEH Hazardous Materials Division (HMD) Underground Storage Tank (UST) Program administers and enforces federal and State laws and regulations and local ordinances for the construction/installation, modification, upgrade, and removal of USTs in San Diego County. If contamination is discovered or likely to be present, owners or operators of USTs are required by law to report the contamination to the DEH HMD and SAM Programs and to take corrective action.

County of San Diego Code of Regulatory Ordinances Sections 68.401-68.406, Defensible Space for Fire Protection Ordinance

This ordinance addresses the accumulation of weeds, rubbish, and other materials on a private property found to create a fire hazard and be injurious to the health, safety, and general welfare of the public. The ordinance makes the presence of such weeds, rubbish, and other materials as a public nuisance, which must be abated in accordance with the provisions of this section. This ordinance is enforced within all County Service Areas, and in the unincorporated areas of the County outside of a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many fire protection districts have adopted and enforce the County's ordinance.

County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards

The San Diego County Fire Authority, in partnership with CAL FIRE, the Bureau of Land Management, and the U.S. Forest Service, is responsible for the enforcement of defensible space inspections. Inspectors from the fire district are responsible to ensure an adequate defensible space has been created and maintained around structures. If violations of the program requirements are noted, inspectors provide a list of required corrective measures and provide a reasonable timeframe to complete the task. If the violations still exist upon re-inspection, the local fire inspector will forward a complaint to the County for further enforcement action.

County of San Diego Consolidated Fire Code

The County of San Diego, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001. The Consolidated Fire Code contains the County and fire protection districts amendments to the California Fire Code. The purpose of consolidation of the County and local fire districts adoptive ordinances is to promote consistency in the interpretation and enforcement of the Consolidated Fire Code for the protection of the public health and safety, which includes permit requirements for the installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the code. The Consolidated Fire Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management. Additionally, the fire code regulates hazardous materials and associated measures to ensure that public health and safety are protected from incidents relating to hazardous substance releases.

County Department of Planning and Land Use Fire Prevention in Project Design Standards

Following the October 2003 wildfires, the County incorporated a number of fire prevention strategies into the discretionary project review process for CEQA projects. One of the more significant changes is the requirement that the majority of discretionary permits (e.g., subdivision and use permits) in wildland urban interface areas prepare a FPP for review

and approval. An FPP is a technical report that considers the topography, geology, combustible vegetation (fuel types), climatic conditions, and fire history of the project site. The plan addresses the following in terms of compliance with applicable codes and regulations including but not limited to: water supply, primary and secondary access, travel time to the nearest fire station, structure setback from property lines, ignition-resistant building features, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management. Following the 2007 wildfires, in February 2008, the County amended the Fire Code and Building Code to include strengthened ignition-resistive construction requirements, modifying the previous two-tiered system and requiring "enhanced" standards for all new construction.

County of San Diego General Plan – Safety Element

The purpose of the Safety Element is to include safety considerations in the planning and decision- making process by establishing policies related to future development that will minimize the risk of personal injury, loss of life, property damage, and environmental damage associated with hazards, including hazardous materials and wildfires. As stated in the Safety Element, hazardous materials are generally associated with select commercial, industrial, and agricultural operations, and their use is highly regulated by Federal and State law.

Emergency Response and Evacuation

Emergency response plans are maintained at the federal, state, and local level for all types of disasters, including human-made and natural. Emergency response plans include elements to maintain continuity of government, emergency functions of governmental agencies, mobilization, and application of resources, mutual aid, and public information. The Unified San Diego County Emergency Services Organization has the primary responsibility for preparedness and response activities, and addresses disasters and emergency situations within the unincorporated area of San Diego County. The County of San Diego Office of Emergency Services (OES) serves as staff to the Unified Disaster Council (UDC), the governing body of the Unified San Diego County Emergency Services Organization. Emergency response and preparedness plans include the Operational Area Emergency Response Plan and the San Diego County Multi-Jurisdictional Hazard Mitigation Plan.

Operational Area Emergency Plan

The comprehensive emergency plan, known as the Operational Area Emergency Plan, would provide the framework for emergency response at the project site, in the case of an emergency. Numerous stand-alone emergency plans for the Operational Area exist, such as the HMBP, RMP and the Multi-Jurisdictional Hazard Mitigation Plan.

Multi-Jurisdictional Hazard Mitigation Plan

This plan includes an overview of the risk assessment process, vulnerability assessments, and identifies hazards present in each jurisdiction of San Diego County. Hazards profiled in the plan include wildfire, structure fire, flood, coastal storms, erosion, tsunami, earthquakes, liquefaction, rain induced landslide, dam failure, hazardous materials, incidents, nuclear materials release, and terrorism. The plan sets forth a variety of objectives and actions based on a set of broad goals including: (1) promoting disaster-resistant future development; (2) increased public understanding and support for effective hazard mitigation; (3) building support of local capacity and commitment to become less vulnerable to hazards; (4) enhancement of hazard mitigation coordination and communication with federal, state, local and tribal governments; and (5) reducing the possibility of damage and losses to existing assets, particularly people, critical facilities or infrastructure, and County-owned facilities, due to dam failure, earthquake, coastal storm, erosion, tsunami, landslides, floods, structural fire/wildfire, and manmade hazards.

San Diego County Air Pollution Control District

The San Diego County Air Pollution Control District (SDAPCD) maintains air quality and develops and implements cost-effective programs meeting state and federal mandates. The Asbestos NESHAP, 40 Code of Federal Regulations (CFR) 61, Subpart M is enforced locally under San Diego Air Pollution Control District Regulation XI, (Subpart M – Rule 361.145). This regulation requires the owner or operator of a demolition or renovation to submit surveys for asbestos containing materials (ACMs) and lead based paint (LBP) prior to issuance of any demolition permit and an Asbestos Demolition or Renovation Operational Plan at least 10 working days before any asbestos stripping or removal work begins (such as, site preparation that would break up, dislodge, or similarly disturb asbestos containing material).

2.5.2 Analysis of Project Effects and Determination as to Significance

2.5.2.1 *Guidelines for Determination of Significance*

Based on the County of San Diego Guidelines for Determining Significance, the Project could result in a significant impact relative to hazards and hazardous materials if the Project would:

Hazardous Materials and Existing Contamination:

a) Handle regulated substances subject to CalARP RMP requirements that, in the event of a release, could adversely affect children's health due to the presence of a school or day within one-quarter mile of the facility.
b) Be located on or within one-quarter mile from a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.5

or is otherwise known to have been subject to a release of hazardous substances.

Airport Safety:

c) Located within an established AIA for a public or public use airport and proposes a development intensity, flight obstruction, or other land use that conflicts with the ALUCP.

Risk of Wildfire:

d) 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.

Emergency Response:

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

Vectors:

f) Propose a vector breeding source, including but not limited to, sources of standing water for more than 72 hours (e.g. ponds, stormwater management facilities, constructed wetlands).
g) Propose a substantial increase in the number of residents located within one-quarter mile of a significant existing offsite vector breeding source.

2.5.2.2 *1994 East Otay Mesa Specific Plan EIR*

The 1994 EIR included an analysis of health and safety regulations pertinent at the time of adoption, as well as existing conditions and impacts related to the EOMSP project. The 1994 EIR identified that development of the Specific Plan could result in potential impacts relative to exposure of people living or working within the Specific Plan Area to hazardous substances due to potential use of hazardous materials and potential exposure of people to hazardous substances due to the transport of hazardous materials.

The 1994 EIR determined that no hazardous materials or petroleum products were observed at the site. Additionally, no hazardous wastes were observed and there were no obvious indications that a release of hazardous materials/wastes or petroleum products had occurred at the Project site.

Mitigation for hazardous resources from the 1994 EIR apply to the proposed Project, because industrial uses could occur on the Project site. The 1994 EIR mitigation measures are located on page 4.10-3 of the 1994 EIR. Additional mitigation measures would be

required, as presented in Section 2.5.5, *Mitigation*, relative to potential toxic soils that occur on the Project site.

2.5.2.3 *2000 East Otay Mesa Specific Plan Sunroad Centrum SEIR*

Subsequent to the 1994 EIR, the 2000 SEIR was prepared for the East Otay Mesa Specific Plan Sunroad Centrum project. The 2000 SEIR included Hazards in Section 6.2, *Effects Found Not to be Significant During Initial Study*. Therefore, no new impacts were identified within the 2000 SEIR document, and no new mitigation measures were required.

2.5.2.4 *2012 Sunroad Otay Tech Centre Addendum*

In 2012, an Addendum was prepared for the Sunroad Otay Tech Centre. It was determined that since the approval of previous environmental document, changes in circumstances under which the project was undertaken hads occurred relative to Hazards because the Project site is located within an Urban-Wildland Interface (UWI) area of a Hazardous Fire Area. A FFP was prepared by Hunt Research Corporation (dated June 2010) and was approved by the Rural Fire Protection District (RFPD) and the County of San Diego. The approved FFP details the adequacy of the water supply, proposed access, building ignition and fire resistance, fire protection systems, and equipment, Fuel Modification Zones, and vegetation management. The FPP concluded that fire service for the Sunroad Otay Tech Centre project would be provided from Station 22. Further, the FPP required that access roads and internal roads comply with the fire code and that an adequate water supply be provided by the Otay Water District providing adequate fire flow and pressure. Fuel modification was required for a distance of 100 feet around all structures, 30 feet on either side of a newly constructed road or driveway, and 20 feet on each side of an existing road. During the discretionary review of the site plan, the layout of each lot, onsite access roads, water supply, fire sprinklers, structures, and operations were required to comply with the RFPD, the County Fire Code, requirements of the PDS Fire Marshall, the County Building Code, and the California Building Code. A Project-specific FFP has been prepared for the proposed Project (see Appendix H of this SEIR), which supersedes the adopted Fire Protection Plan of the 2012 Addendum.

2.5.2.5 *Proposed Project*

Since the EOMSP Final EIR was certified in 1994, there have been changes in the circumstances under which the project is undertaken related to Hazards and Hazardous Materials. The Project proposes the introduction of residential development in an area of the Specific Plan where residential uses had not been anticipated, resulting in the potential for residents to be exposed to hazardous materials associated with prior agricultural activities that occurred on the Project site. Additionally, the Project site is surrounded by existing and planned industrial uses and is located within the Brown Field Municipal AIA.

A portion of the proposed Project is located within the VHFHSZ created by the City of San Diego Fire-Rescue Department, and the majority of the site is located within the HFHSZ in the SRA. A FPP has been prepared by the Project applicant to assess potential fire safety issues, including water supply, access, building ignition and fire resistance, fire protection systems and equipment, defensible space, and vegetation management.

In addition, the County of San Diego has implemented hydromodification requirements to limit the discharge and duration of stormwater runoff. The Project has been designed in conformance with the hydromodification standards, and as a result there is the potential for standing water to be present in proposed detention basins following storm events. The presence of standing water on-site could result in vector (mosquito) breeding, which may adversely affect human health.

Therefore, based on the potential for impacts to occur from potential hazards that were not previously disclosed and the Project's proposed change in land uses, the County of San Diego has determined that a supplemental analysis of impacts due to hazards is required in order to identify, disclose, and mitigate for any previously undisclosed impacts that could result from Project implementation.

Hazards and Hazardous Materials

Guidelines for the Determination of Significance:

> *Would the proposed Project handle regulated substances subject to CalARP RMP requirements that, in the event of a release, could adversely affect children's health due to the presence of a school or day care center within one- quarter mile of the facility?*
>
> *Would the proposed Project be located on or within one-quarter mile from a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.5 or is otherwise known to have been subject to a release of hazardous substances?*

Although hazardous materials can be found in all types of land uses, those that are more likely to regularly use high quantities of hazardous materials include limited impact industrial, medium impact industrial, high impact industrial, general commercial, and rural commercial. With future development of the proposed commercial and light industrial land use designations, the number of facilities that transport, use and dispose of hazardous materials would increase under the proposed Project. Because the proposed Project requires compliance with the programs, policies and regulations described above, future development of the Project site addressed in this SEIR would not result in significant direct impacts related to the routine transport, use, or disposal of hazardous materials. Therefore, mitigation would not be required.

Implementation of the proposed Project would have the potential to result in adverse impacts to the public and environment from an unplanned or accidental release of hazardous materials. The Specific Plan Amendment would allow future development of the Project site with light industrial and commercial land use designations, which could use and store hazardous materials and have the potential to result in a reasonably foreseeable upset or accident condition involving the release of hazardous materials. Because future uses would be required to comply with the same combination of Federal, State, and local regulations; existing County regulatory processes; and, the 2011 General Plan goals and policies, future development of the Project site that could occur with the Specific Plan Amendment would not result in significant direct impacts related to the accidental release of hazardous materials. Therefore, mitigation would not be required.

The Project site is located within the San Ysidro Elementary School District and the Sweetwater Union High School District. There are currently no schools located or planned for the Project vicinity. If a school were to be located within the Project vicinity, the Project would result in less than significant direct and cumulative impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school due to the implementation of a combination of Federal, State, and local regulations; existing County regulatory processes; and, the 2011 General Plan goals and policies. Therefore, mitigation would not be required.

Relative to hazardous materials sites, potential pathways of exposure to contaminants from existing contamination includes direct ingestion of contaminated soils and/or ground water, inhalation of volatiles and fugitive dusts, potential explosion hazards associated with landfill gas, ingestion of contaminated ground water caused by migration of chemicals through soil to an underlying potable aquifer, dermal absorption, ingestion of homegrown produce that has been contaminated via plant uptake, and migration of volatiles into basements and slabs. The proposed Specific Plan Amendment would increase the potential for development on sites such as areas of historic or current agriculture uses. The residential land uses that would be allowed under the proposed Specific Plan Amendment would have the potential to introduce human populations into or near areas with a history of contamination from agricultural use. In addition, construction activities could uncover buried underground storage tanks or other buried hazards.

The Project site is not listed as a Cortese Site. A *Phase I Site Assessment* (July 24, 2015), included in Appendix M, and a *Phase II Soil Sampling*, (March 2, 2016), included in Appendix N, were prepared for the proposed Project by SCS Engineers in order to determine if future land uses could be exposed to contaminated soils and/or groundwater associated with the Project site. This section includes a summary of the results of those studies.

The Phase I Assessment identified soil suspected to have been imported from off-site, including a berm of soil and woodchips running parallel to Harvest Road and a pile of reddish-brown soil with asphalt pieces at the west entrance to the central mesa area off of

Harvest Road. In order to determine if these imported soils contain elevated concentrations of constituents of concerns (CoCs), soil samples were collected and analyzed. Soil samples were taken in two locations along the berm. Pesticides, dichlorodiphenyltrichloroethane (DDD), dichlorodiphenyldichloroethylene (DDE), and dichlorodiphenyltrichloroethane (DDT) were detected above the laboratory reporting limit in sample SP2; none of these values are above their respective residential Regional Screening Level (RSL) limits. These analytes (the substance or chemical constituent of interest) were not detected above the laboratory reporting limit in sample SP1. Toxaphene was detected above the laboratory reporting limit in both samples but were below the residential RSL screening value. Total petroleum hydrocarbons as oil (TPHo) were detected above the laboratory reporting limit in sample SP1; TPHo was not detected above the laboratory reporting limit in sample SP2. Total petroleum hydrocarbons as diesel (TPHd) and as gasoline (TPHg) were not detected above the laboratory limit in either sample.

Agricultural activity has occurred at various locations on the Project site from 1953 to 1989, partially during a time when organochlorine pesticides such as DDT, chlordane, and metal-based pesticides, such as arsenic, were in general use for pest control. These classes of pesticides are known to have the potential to remain detectable in the subsurface soil for extended periods of time. Due to agricultural activities occurring on portions of the Project site, it is assumed that residual concentrations of organochlorine and/or metal-based pesticides are present in the soil at the Project site and site vicinity. Trace concentrations are likely to be present even after mass grading and earth movement. Assuming the legal and permitted application of these pesticides, it is considered a de minimis condition as defined by ASTM, and no exposure pathways currently exist to pose a potential human health risk at the site.

The EPA lists toxaphene as a probable carcinogen and as a toxic substance; toxaphene is present in the shallow subsurface at the Project site at concentrations that exceed the residential RSL. Based on the Proposed Land Use Plan and taking into account the distribution of toxaphene concentrations observed at the site as part of the Phase II analysis, the following parcels contain toxaphene concentrations above their applicable RSL: A, C, D, E, F, G, and H. Therefore, based on the proposed redevelopment and future occupation of the site, contaminated soil, if encountered, could pose a potentially significant impact to occupants and/or visitors of the site (**Impact HZ-1**). Mitigation measures would be required as part of future development activities to ensure adequate protection of human health and environment.

Additional sampling may be warranted to verify the areas of pesticide-bearing soil, particularly once building and/or development pads are better known. If soil sampling indicates the presence of pesticide-bearing soil, future development for planning areas A, C, D, E, F, G, and H would require mitigation for soils as part of grading operations. Mitigation can occur by relocating contaminated soils under proposed hardscape areas or moving contaminated soils to proposed landscape areas and capping with a clean soil buffer, which effectively eliminates exposure pathways and health risk at the site.

Alternative methods of mitigation such as in-situ bioremediation or "dig-and-haul" may also be utilized at the site, if volumes of toxaphene-bearing soil prove too large to practically bury under hardscape. If soil export or dig-and-haul methods are needed during mitigation activities, where toxaphene-bearing soil needs to be excavated and transported to an approved disposal facility, waste-based criteria would be required to ensure proper handling and disposal of soil containing a toxic substance and subject to waste regulations.

Airports and Airport Safety

Guideline for the Determination of Significance:

> *Would the project be located within an established AIA for a public or public use airport and proposes a development intensity, flight obstruction, or other land use that conflicts with the ALUCP?*

Airport hazards involve uncertain events that may occur occasionally as part of regular aircraft operations. This is quite different than predictable events (such as noise) that occur with every aircraft operation. On the ground, aircraft hazards are generally produced by aircraft mishaps, either incident or accidents, which are associated with the operation of an aircraft. The Project site is located within Review Area 1 of Brown Field Municipal Airport (see Figure 2.5-3). The western portion of the Project site is located within three safety zones for Brown Field: Zone 2: Inner Approach/Departure Zone, Zone 4: Outer Approach/Departure Zone, and Zone 6: Traffic Pattern Zone (see Figure 2.5-4).

Impacts have the potential to occur with future development of the Project site addressed in this SEIR. The Brown Field Airport is located north of Otay Mesa Road, generally between Heritage Road and Lonestar Road within the City of San Diego. Brown Field is located approximately one mile west of the site and functions as a general aviation airport and reliever airport for the San Diego International Airport. The proposed Specific Plan Amendment complies with the development regulations outlined in the Brown Field ALUCP. A small portion of the site falls within Zone 2 and, per the compatibility guidelines, residential uses would not be permitted in that area. The portion of the site within Zone 4 would be limited to a maximum of 20 dwelling units per acre consistent with the ALUCP. Future site plan review would be required to ensure that individual development proposals comply with the requirements of the Brown Field ALUCP, including restrictions relative to building heights. Therefore, with consistency with the regulations of the Brown Field ALUCP and 2011 General Plan goals/policies related to airport hazards, impacts would be less than significant. No mitigation measures would be required.

The Project is not within the vicinity of a private airstrip, and therefore would not result in impacts related to safety hazards for people residing or working in the project area.

Wildland Fire Risk

Guideline for the Determination of Significance:

> *Would the proposed Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

The San Diego County Fire District, in conjunction with CAL FIRE and the San Diego County Sheriff, is in the process of implementing full-time fire and emergency medical services in the East Otay Mesa Specific Plan Area. As projects develop, developers will be required to annex into the existing Public Safety CFD 09-1 to augment District revenues for ongoing operational costs. At build-out, a permanent facility will be co-located with a sheriff's station at the northwestern corner of Enrico Fermi Drive and Lone Star Road. This new fire station would serve the proposed Project, and the proposed Project would be conditioned to fund the additional increment related to residential uses for the construction, equipment, and ongoing operations and maintenance of the new fire station.

As previously described, a *FPP* has been prepared for the Project by Jensen Hughes (October 19, 2015). The Fire Protection Plan is included within Appendix H of this SEIR. The FPP for the proposed Project is a based on the conceptual plan for the East Otay Mesa Specific Plan Amendment Project described in Chapter 1. The Project-specific FPP supersedes the previously approved FPP for the site. The Project-specific FPP addresses the introduction of residential land uses in the Specific Plan area. The FPP concluded that the proposed Project would have no significant adverse impact on protecting residents from wildfires. The existing site is currently a vegetated area so developing the site and maintaining adequate fuel modification zones would reduce the amount of fuel in and around the proposed Project area, reducing fire hazard to other developments in the vicinity. The proposed Project would create a large firebreak in the vegetation and provide firefighters with fire access roads and fire hydrants, which combined would create a defensible space that can even be used to help fight a wildfire. Developing this area would attract more people to live, work, and shop, at this location, which would increase the potential for a greater number of people to be exposed to a wildfire, but this risk would be greatly reduced by the fire protection features of the buildings and the potential benefit of having a developed and defensible space against wildfires. The proposed Project would use the FPP as a basis of design and, once a detailed design has been completed, the detailed plans would be submitted to the County of San Diego as part of future Site Plan review for approval. The proposed Project would be designed to be in compliance with wildland fire regulations.

The greatest threat of wildfires for the Project site is during summer and fall, when humidity is lowest and temperatures are highest. During the fall, Santa Ana winds can occur, which are strong winds that further increase temperature and lower humidity. The fire behavior modeling program BehavePlus was used to evaluate these conditions.

Review of the climate and previous wildfire events demonstrations show that wildfires will likely occur on or near the Project site again.

The FPP determined that the proposed Project would not result in significant adverse impact on protecting residents from wildfires and the Project would result in potential benefits for the wildfire protection of the surrounding area. The proposed Project would potentially increase the number of people exposed to a wildfire but would be designed to minimize wildfire exposure risks. Table 1-3 *Project Design Considerations* for a list of measures that would be implemented as a part of the proposed Project. Future development of the Project site would provide additional emergency services to the community, fire access roads would provide improved access to the Project site and the wildland-urban interface, and proposed fire hydrants would provide firefighters with adequate water resources to fight structure and wildland fires. Future buildings would have reduced flammability due to ignition-resistant construction and automatic fire sprinkler installation. Any fuel modification zones required as part of future Site Plans would reduce the intensity of an approaching fire and help to reduce the likelihood of both a structure fire spreading into naturally vegetated areas and a wildfire spreading to a structure. In addition, development of the Project site would provide a fire break and defensible space, from which a wildfire can be more easily fought by firefighters. Property owners would be responsible to maintain their property and structures in accordance with the San Diego County Building and Fire Codes.

As described in the FPP, the results of the fire behavior modeling show that the current County of San Diego wildland fire regulations would be adequate and additional requirements or mitigation measures would not be needed for the Specific Plan Amendment. The fuel modification zones, construction methods, and other requirements in the San Diego County Consolidated Code outlined in the report and the addition of the fire station would provide suitable protection for the proposed Project.

Based on the aforementioned, the Specific Plan Amendment would not result in significant impacts associated with wildland fires. Future Site Plan review would ensure that future development occurs in a manner that adheres to all relevant codes. No mitigation is required.

Emergency Response

Guideline for the Determination of Significance:

> *Would the proposed Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project site is bound to the south by Otay Mesa Road, which connects to regional circulation facilities, such as SR-125, which are both identified in the Unified San Diego County Emergency Services Organizational Operational Area Emergency Plan (2010). The Unified San

Diego County Emergency Services Organizational Operational Area Emergency Plan contains transportation strategies for evacuation in the event of an emergency such as contra-flow operations, traffic signal coordination and timing, closure of on- and off-ramps, and intelligent transportation systems. Implementation of the proposed Project would not interfere with any of these strategies. Therefore, no impact would result and no mitigation is required.

Vectors

Guidelines for the Determination of Significance:

> *Does the Project propose a vector breeding source, including but not limited to, sources of standing water for more than 72 hours (e.g. ponds, stormwater management facilities, constructed wetlands)?*
>
> *Would the prosed Project result in a substantial increase in the number of residents located within one-quarter mile of a significant existing offsite vector breeding source?*

Vectors can cause potentially significant public health risks due to the transmission of disease to human and animal populations and can also create a nuisance for the residents of the County. A project that proposes a source of vector breeding habitat could result in an unnecessary increase in vector populations. When the vector breeding source is located near a substantial human population, a potentially adverse environmental effect could occur.

The proposed Project would result in grading the entire Project site. As such, there would be minimal potential for areas that could contain standing water for long enough periods of time to provide suitable breeding habitat for mosquitoes.

In accordance with the County of San Diego Watershed Protection, Storm Water Management, and Discharge Ordinance (WPO), a Major Storm Management Plan has been prepared for the Project to describe how the Project will minimize the short- and long-term impacts on receiving water quality. The Project would require detention basins to adequately control stormwater runoff volumes generated on-site. Proposed detention basins would have the potential to be suitable habitat for mosquito breeding when conditions allow standing water for more than 72 hours.

However, as part of the Major Storm Management Plan, the Project would implement a number of design and maintenance BMPs to prevent and control vectors (mosquitoes) from breeding in the on-site detention basins. For example, the Project would regularly remove trash and debris from on-site detention basins, which would prevent obstruction of the outlet structure and facilitate drainage. The Project would also regularly remove vegetation from on-site detention basins, which would minimize suitable habitat for mosquito larvae and would allow for faster drainage of the detention basins. Also, the

drawdown time of each detention basin would be monitored after significant rain events (i.e., consistent rainfall over a period of 12 hours or longer). In the event the drawdown time exceeds 96 hours, corrective measures would be taken, such as adjusting irrigation systems, removing obstructions of debris or invasive vegetation clearing underdrains, or repairing/replacing clogged or compacted soils. Implementation of these design and maintenance BMPs would ensure that human exposure to vectors would not substantially increase. See Table 1-3 *Project Design Considerations* for a list of measures that would be implemented as a part of the proposed Project. Accordingly, the Project would minimize the amount of suitable vector breeding habitat on-site, and impacts associated with vectors (mosquitoes) would be less than significant.

2.5.3 Cumulative Impact Analysis

Hazards and Hazardous Materials

The majority of projects in the immediate vicinity of the Project site are industrial in nature. Potential cumulative public health hazards do not extend beyond a project's boundaries, since such impacts are typically confined to specific locations and site-specific hazards and do not generally create a cumulative impact. Nonetheless, the mitigation measure included below would reduce potential hazards and hazardous materials impacts to below a level of significance. Applications of standard health and safety measures to other projects in the area would reduce the cumulative risk of adverse public health effects associated with the use, storage, and transport of hazardous materials. The cumulative health and safety impacts would not be significant with the implementation of mitigation measures identified below and adherence to applicable laws and regulations.

Airports and Airport Safety

The Project site is located within the AIA for Brown Field. Several projects considered as part of the cumulative impacts evaluation in this SEIR are also located within the AIA for Brown Field. Similar to the proposed Project, all development projects within the Brown Field AIA would be required to comply with the Brown Field ALUCP. Therefore, potentially cumulative impacts would be less than significant.

Wildland Fire Risk

The proposed Project would have no significant adverse impact on the ability to protect residents from wildfires. The existing site is currently a vegetated area; developing the site and maintaining adequate fuel modification zones would reduce the amount of fuel in and around the proposed Project area, reducing fire hazard to other developments in the vicinity. The proposed Project would function as large fire break in the vegetation and would provide firefighters with fire access roads and fire hydrants, which combined will create a defensible space that can even be used to help fight a wildfire. While developing the Project site would attract more people to live, work, and shop at this location, which will increase the potential for a greater number of people to be exposed to

a wildfire, this risk would be greatly reduced by the fire protection features of the buildings and the potential benefit of having a developed and defensible space against wildfires.

Emergency Response

The Unified San Diego County Emergency Services Organizational Operational Area Emergency Plan contains transportation strategies for evacuation in the event of an emergency, such as contra-flow operations, traffic signal coordination and timing, closure of on- and off-ramps, and intelligent transportation systems. These measures are directed at facilitating response to emergencies and allow optimal ability to evacuate affected areas. The County's response and evacuation plans would be implemented on a regional level. The proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Cumulative projects evaluated as part of this SEIR would similarly not have the potential to impair or interfere with the County's emergency response efforts.

Vectors

With respect to vector hazards, all development would be required to comply with the vector control requirements of the County of San Diego DEH, and would be subject to monitoring by the DEH's Vector Control Program. Additionally, projects which propose a major development would be required to comply with the WPO. Accordingly, all projects within the cumulative study area would minimize the amount of suitable vector breeding habitat to ensure that human exposure to vectors would not increase. As such, implementation of the Project would result in a less than significant cumulative impact due to vector hazards.

2.5.4 Significance of Impacts Prior to Mitigation

Impact HZ-1: Future occupants of and/or visitors to the Project site may be exposed to contaminated soil, if encountered.

2.5.5 Mitigation

M-HZ-1: As part of Site Plan review, soil sampling shall occur for planning areas A, C, D, E, F, G, and H. If constituents of concern (CoC)-bearing soils are encountered, following County DEH standards, ~~then~~ a Soil Management Plan (SMP) shall be prepared. The SMP shall identify remedial and cost-effective strategies, integrate environmental issues into the site development process, and provide the means and methods for identifying, segregating, and properly handling CoC-bearing soils at the site.

2.5.6 Conclusion

The proposed Project would result in no significant hazards and hazardous materials impacts, with the exception of creating the potential exposure to contaminated soils (**Impact HZ-1**). However, impacts are mitigated fully with implementation of mitigation measure M-HZ-1, above. All Project impacts would be reduced to below a level of significance.

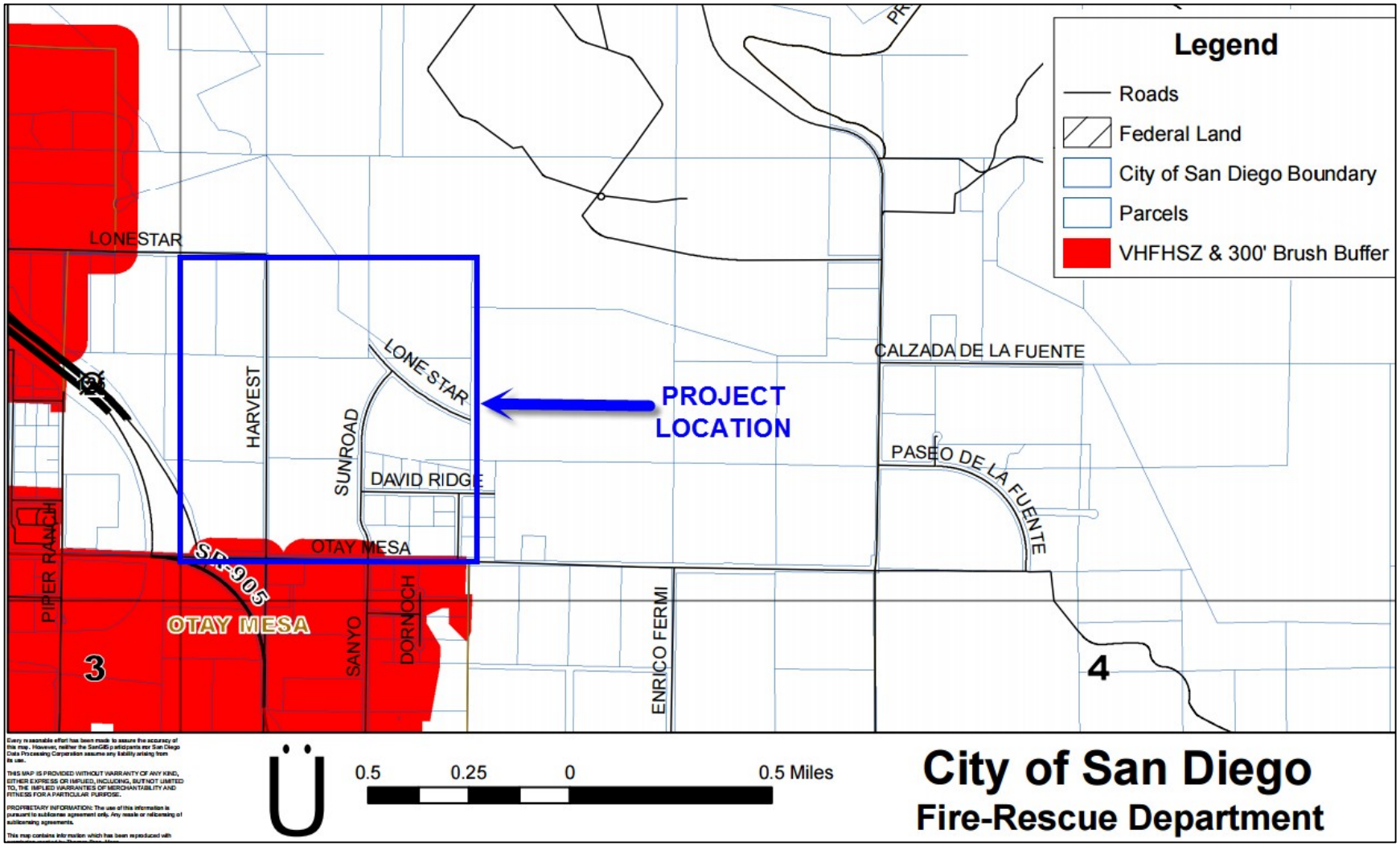

FIGURE 2.5-1. ***CITY OF SAN DIEGO VERY HIGH FIRE HAZARD SEVERITY ZONE MAP***

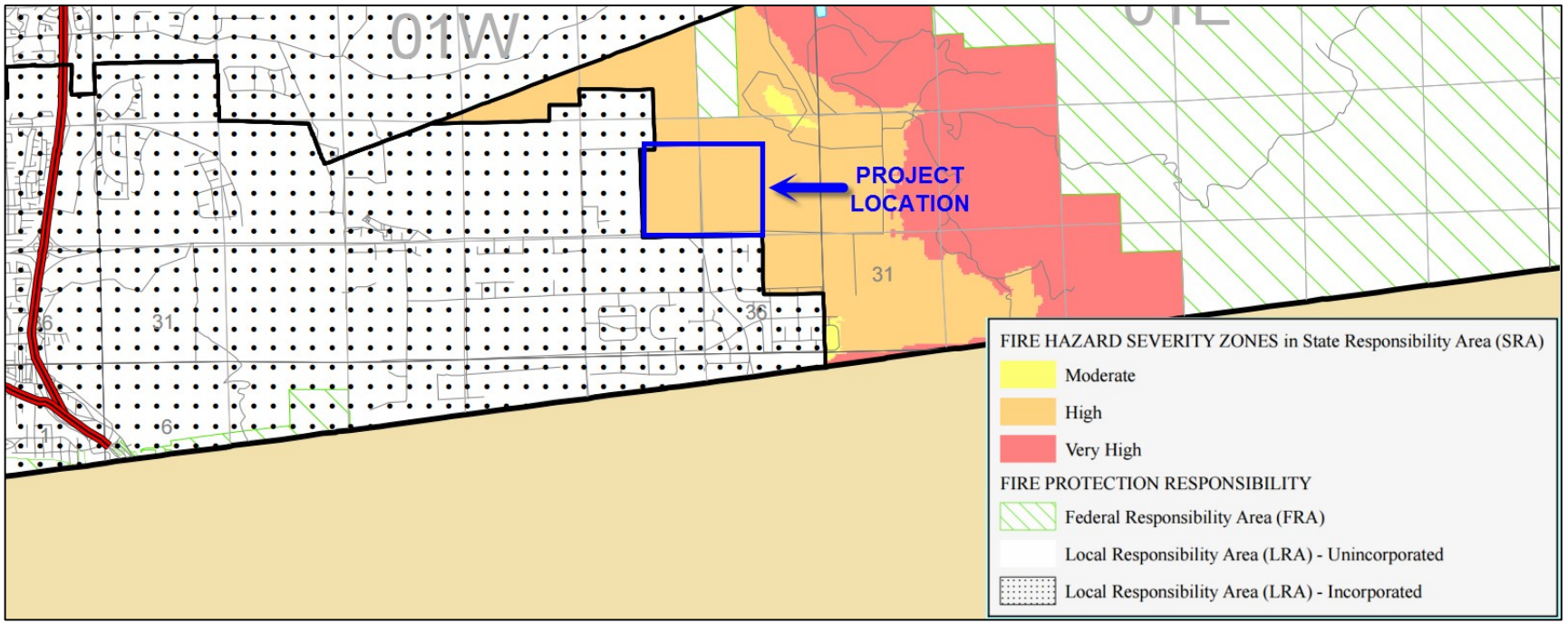

FIGURE 2.5-2. ***FIRE HAZARD SEVERITY ZONES***

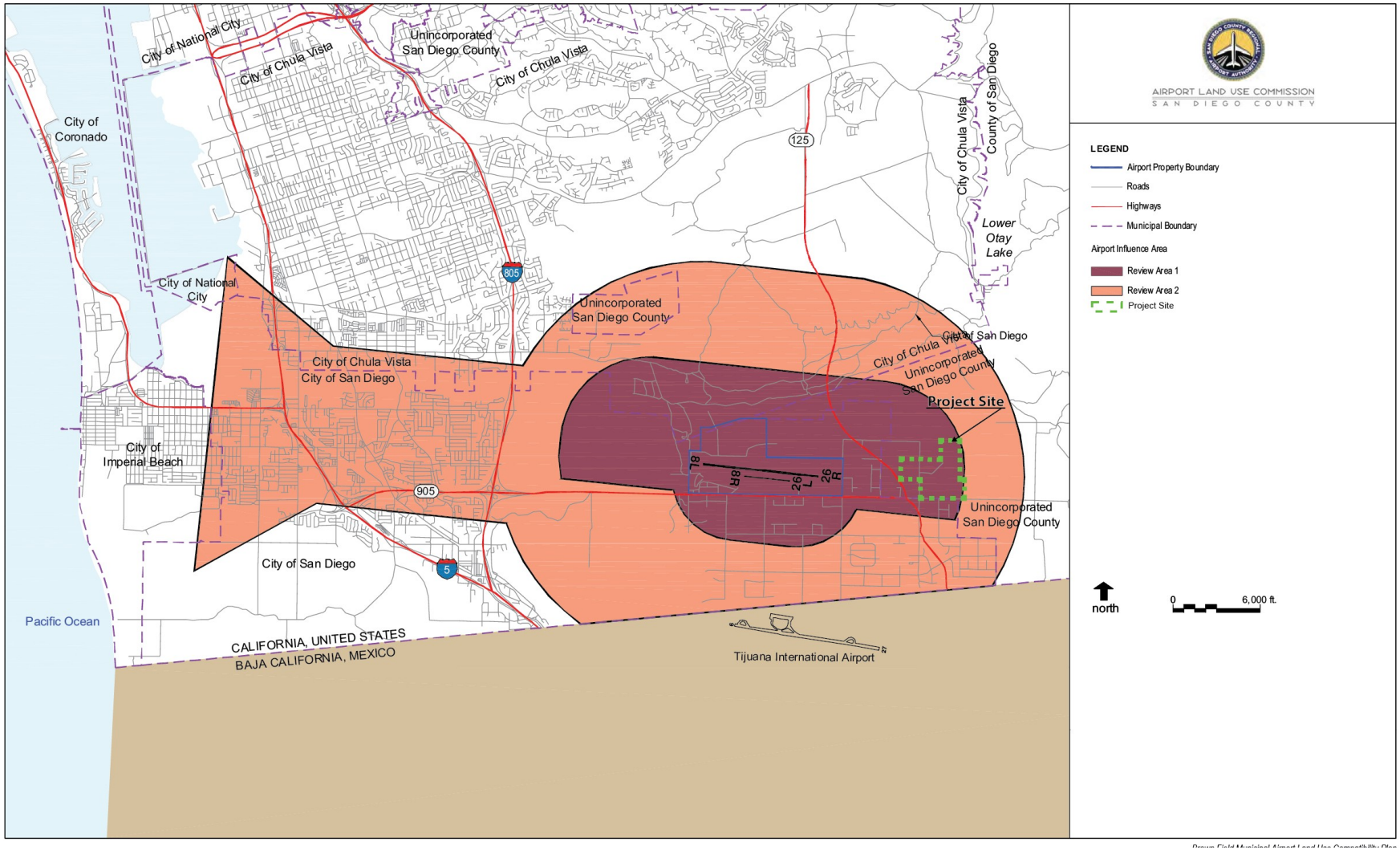

FIGURE 2.5-3. *BROWN FIELD AIRPORT INFLUENCE AREA*

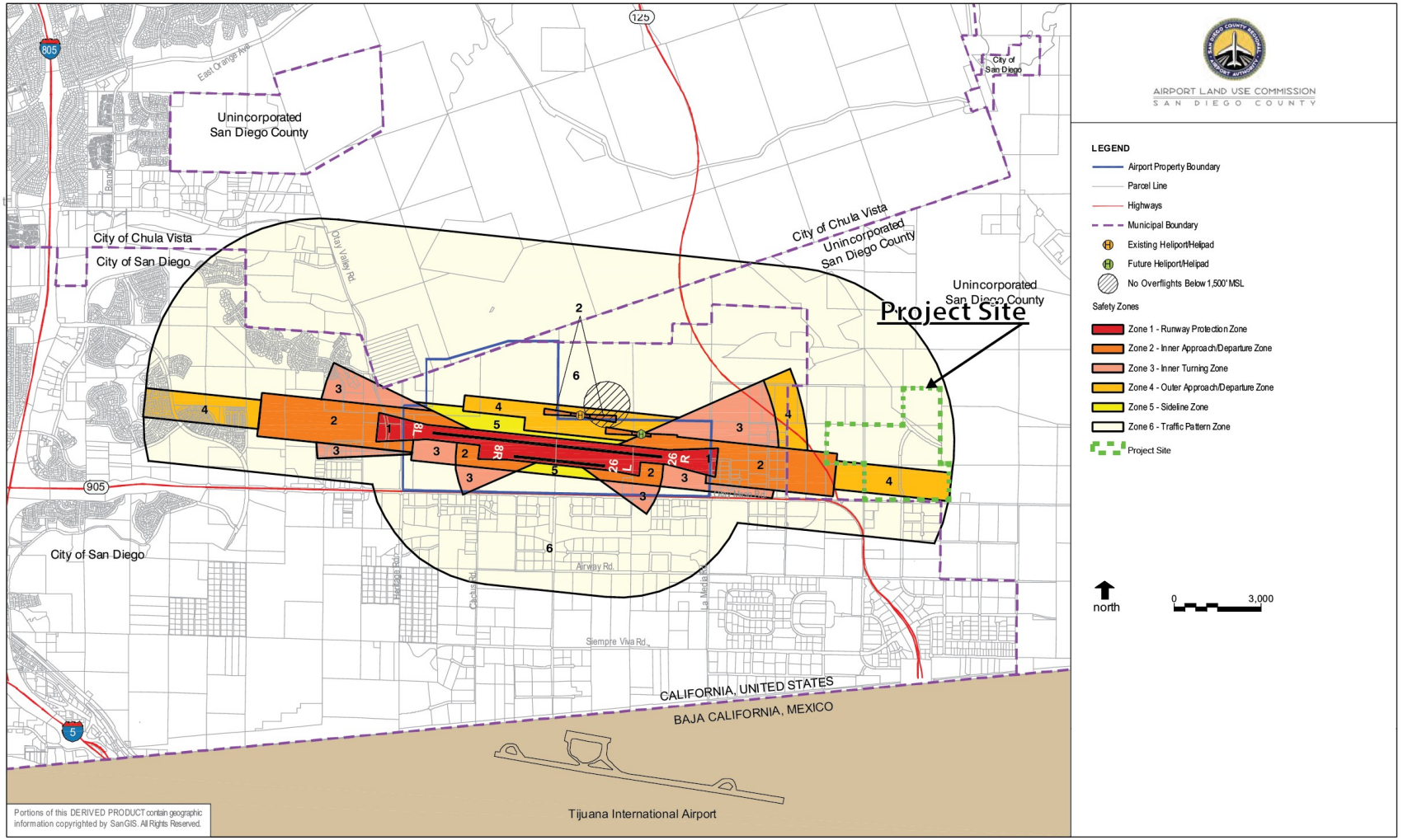

FIGURE 2.5-4. *BROWN FIELD AIRPORT SAFETY ZONES*