Section 4.9
Hazards and Hazardous Materials

4.9.1 Overview

This section describes the environmental and regulatory settings for hazards and hazardous materials at the project site. It also describes impacts on hazards and hazardous materials that would result from implementation of the project.

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under California Code of Regulations (CCR) Title 22, the term *hazardous substance* refers to both hazardous materials and hazardous wastes. Both are classified according to four properties: (1) toxicity, (2) ignitability, (3) corrosiveness, and/or (4) reactivity (CCR Title 22, Chapter 11). A hazardous material is defined in ~~CCR Title 22~~Health and Safety Code Section 25501 as:

> ~~[a] substance or combination of substances which~~(n)(1) "Hazardous material" means a material listed in paragraph (2) that, because of its quantity, concentration, or physical~~,~~ or chemical ~~or infectious~~ characteristics, ~~may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose~~poses a ~~substantial~~significant present or potential hazard to human health ~~or~~and safety or to the environment ~~when improperly treated, stored, transported~~if released into the workplace or the environment, or a material specified in an ordinance adopted pursuant to paragraph (3).
>
> (2) Hazardous materials include all of the following:
>
> (A) A substance or product for which the manufacturer or producer is required to prepare a material safety data sheet pursuant to the Hazardous Substances Information and Training Act (Chapter 2.5 (commencing with Section 6360) of Part 1 of Division 5 of the Labor Code) or pursuant to any applicable federal law or ~~disposed of or otherwise managed (CCR~~regulation.
>
> (B) A substance listed as a radioactive material in Appendix B of Part 30 (commencing with Section 30.1) of Title ~~22 § 66260.~~10~~).~~ of the Code of Federal Regulations, as maintained and updated by the United States Nuclear Regulatory Commission.
>
> (C) A substance listed pursuant to Title 49 of the Code of Federal Regulations.
>
> (D) A substance listed in Section 339 of Title 8 of the California Code of Regulations.
>
> (E) A material listed as an extremely hazardous waste, as defined in Section 25115, a hazardous waste, as defined in Section 25117, or a hazardous substance, as defined in Section 25316.

Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials.

4.9.2 Existing Conditions

4.9.2.1 Hazardous Materials

The hazardous materials information in this section is based on a review of the Regional Water Quality Control Board (RWQCB) GeoTracker and Department of Toxic Substances Control (DTSC) EnviroStor online databases. The database review identified the following hazardous materials site

within the project footprint, High School No 12, Study Area B, Wright's Field, at 2480 South Grade Road in Alpine, California. In 2008, the Grossmont Union High School District evaluated the project site, which was one of three locations considered for construction of a new high school. A Phase I Environmental Site Assessment (ESA) was prepared as part of that evaluation. A March 20, 2008, letter from DTSC to the Grossmont Union High School District concluded that there were no hazardous material releases or presence of naturally occurring hazardous materials. The letter concurred with the Phase I ESA's conclusion that further investigation at the project site was not required.

There are no other listed hazardous materials sites within the project footprint or within a 0.25-mile radius from the project site.

4.9.2.2 Proximity to Schools

Joan MacQueen Middle School is located approximately 0.4-mile west of the project site at 2001 Tavern Rd, Alpine, California. Boulder Oaks Elementary School is located approximately 0.7-mile west of the project site at 2320 Tavern Rd.

4.9.2.3 Proximity to Airports and Airstrips

The nearest airport to the project site is On the Rocks Airport (1CA6), which is approximately 4.5 miles southeast of the project site (AirNav.com 2021).

4.9.2.4 Emergency Response Plan

The County of San Diego (County) Office of Emergency Services (OES) coordinates the County's overall response to disasters. OES notifies appropriate agencies when a disaster occurs, coordinates with responding agencies, ensures that resources are available and mobilized, plans for disaster response and recovery, and develops preparedness materials for the public. OES acts as the staff to the Unified Disaster Council (UDC), which was established under a joint powers agreement among all 18 incorporated cities and the County. The UDC coordinates plans and programs countywide to ensure the protection of life and property.

4.9.2.5 Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas with significant fire hazards in ~~the county~~San Diego County through its Fire and Resource Assessment Program. Specifically, CAL FIRE defines and maps Fire Hazard Severity Zones (FHSZs) to identify the potential fire hazard severity expected in different areas of the ~~s~~State, as required by Public Resources Code (PRC) Sections 4201–4205. FHSZ determinations are based on an area's vegetation, topography (slope), weather (including winds), crown fire potential, and ember production and movement potential. FHSZs are classified as Very High, High, or Moderate in areas of California where the ~~s~~State is responsible for fire protection (i.e., State Responsibility Areas [SRAs]) (CAL FIRE 2007).

According to CAL FIRE's "Fire Hazard Severity Zones in SRA" map, the project site is in a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2007). In response to this designation, the San Diego County Fire Protection District (FPD)/CAL FIRE and the ~~Alpine FPD~~AFPD enforce robust fire prevention regulations in the project area.

A Fire and Emergency Operation Assessment (FEOA) was prepared to identify wildfire risks at the project site (Rohde and Associates 2021); the following information in this section is from the FEOA. The FEOA noted that the project site historically has been subject to wildfires. -The FEOA identified the following site-specific wildfire and ignition risks at the project site:

- Proximity to South Grade Road, a known location with human related fire ignition factors. The location of South Grade Road, on the southeast boundary of the land for Alpine Park, poses elevated ignition risks because of passing vehicles—specifically, vehicle exhaust, hot materials discarded from vehicles, vehicle accidents, off-road parking, dragging tow chains, or related hazards;
- Adjacency of the site to significant human activity, including homes and ranches. The proximity of homes and ranches to County Department of Parks and Recreation (DPR) and Back Country Land Trust (BCLT) Wright's Field Preserve lands poses existing risks from human-related fire ignition factors, extending from these properties to the site;
- Robust public usage of the site for both dispersed and organized recreation. Human use could increase on the site with development of the park, thereby increasing the associated human-related fire ignition factors;
- Location of the park site with respect to historical major wildfire corridors. The current conditions of the project site consist primarily of unmanaged vegetation that includes annual grasslands and grass-shrub, which are highly receptive to ignition and rapid fire spread, particularly during offshore Santa Ana wind events, which usually produce critical fire weather that includes low humidity. Historical wildfire corridors that experience both Santa Ana winds and onshore wind-driven conditions are within proximity of the project site. Past wildfires have traversed this corridor;
- Heavy fuel concentrations on some County/Back Country Land Trust (BCLT) lands. Heavier fuels, such as coastal sage or mixed chaparral plant communities with fuel loading from 20 to 40 tons per acre, could present extreme burning characteristics during critical fire weather, including high thermal outputs, rapid rates of spread, and spotting;
- Current off-road parking and occasional vehicle trespass. Trespassing does occasionally occur, although vehicle access is currently blocked by light fencing; and
- Potential increase in demand for local public safety resources due to developed park use. The proposed park uses will introduce new sources of human activity at the site that could place increased demand on local public safety resources.

The current conditions of the project site consist primarily of vegetation that includes annual grasslands and grass-shrub, which are highly receptive to ignition and rapid fire spread, particularly during offshore Santa Ana wind events, which usually produce critical fire weather that includes low humidity. As described further in Threshold 7 below, fire behavior modeling indicates that under existing conditions, wildfire behavior could be severe during a Santa Ana wind event with a fire burning in existing vegetation fuels. During extreme offshore wind events with 28-mph sustained winds and 41-mph wind gusts, flame lengths up to approximately 18.1 feet are expected with rates of fire spread up to 6.2 miles per hour and ember spotting distances of up to 1.1 miles. The project site currently experiences occasional unauthorized public access and trespassing events that place it at risk for human-caused wildfire ignition. While County DPR monitors the site to minimize unauthorized use, these activities are common in open public spaces.

The following vegetation fuel modification and human activity fire prevention measures currently exist on the project site:

Vegetation Fuel Modification

- EXISTING: Maintenance of an existing 30-foot buffer where vegetation has been cleared adjacent to the roadside along the County property, which has been historically cleared and is required by AFPD, and is not part of this project.
- EXISTING: Maintenance of a historically cleared and existing 100-foot buffer where vegetation has been cleared where there are adjoining properties along the northern boundary of the County-owned parcel, which is required by AFPD and is not part of this Project.

Human Activity

- EXISTING: Small swing gate as a vehicle control barrier
- EXISTING: Weekly checks of the project site by rangers

The existing vegetation fuel modification fire prevention measures adjacent to the roadside and adjoining properties provide maintenance of some hazardous vegetation fuels, but the project site remains largely dominated by unmaintained vegetation that poses a wildfire risk. The small swing gate and weekly ranger checks provide some access restriction and enforcement presence, but the project site remains subject to occasional unauthorized vehicular and pedestrian public access to and within hazardous vegetation fuels, making it vulnerable to potential smoking, vehicle, or other ignition hazards that increase wildfire risk.

For additional information on wildfire hazards, as well as prevention measures, please see Section 4.20, *Wildfire*.

4.9.3 Applicable Laws and Regulations

4.9.3.1 Federal

Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The federal Toxic Substances Control Act (TSCA) of 1976 and the Resource Conservation and Recovery Act (RCRA) of 1976 established a U.S. Environmental Protection Agency– (U.S. EPA-) administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. TSCA authorized U.S. EPA to secure information on all new and existing chemical substances and control any substances determined to cause unreasonable risks to public health or the environment. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes.

Comprehensive Environmental Response, Compensation, and Liability Act/ Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law (42 United States Code [USC] 103) provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP (Code of Federal Regulations [CFR] Title 40, Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

The Emergency Planning and Community-Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 was created to help communities plan for chemical emergencies and respond to concerns regarding environmental and safety hazards resulting from the storage and handling of toxic chemicals. The EPCRA requires the reporting of storage, use, and releases of hazardous substances to federal, state, and local governments.

Section 402 of the Clean Water Act: National Pollutant Discharge Elimination System Permits

Clean Water Act Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for discharges of pollutants, except dredged or fill material, into waters of the U.S. In California, Regional Water Quality Control Boards (RWQCB) administer the program. Section 402(p) requires permits for discharges of stormwater from industrial/construction and municipal separate storm sewer systems (MS4s). In addition, construction sites on 1 acre of land or more are required to obtain an NPDES permit.

Occupational Safety and Health Administration

The mission of the Occupational Safety and Health Administration (OSHA) is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in 29 CFR 1910.

Department of Transportation Hazardous Materials Regulations (49 CFR 100–185)

U.S. Department of Transportation (DOT) hazardous materials regulations cover all aspects of hazardous materials packaging, handling, and transport. These include Parts 107 (Hazard Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response), 173 (Packaging

Requirements), 174 (Rail Transportation), 176 (Vessel Transportation), 177 (Highway Transportation), 178 (Packaging Specifications), and 180 (Packaging Maintenance).

4.9.3.2 State

Department of Toxic Substances Control Regulations

DTSC regulates hazardous waste, primarily under the authority of the federal RCRA and the California Health and Safety Code (H&SC) (primarily Division 20, Chapters 6.5 through 10.6, and CCR Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. CCR Title 22, Division 4.5, Chapter 11, Article 3, highlights the procedures for identifying hazardous waste into these 4 categories: ignitable, corrosive, reactive, and toxic. CCR Title 22, Division 4.5, Chapter 11, Article 5, categorizes hazardous waste into acutely hazardous waste, extremely hazardous waste, non-RCRA hazardous waste, RCRA hazardous waste, special waste, and universal waste. CCR Title 22 also underscores the guidelines for managing hazardous waste, which pertain to storage, housekeeping, recordkeeping, and inspecting.

DTSC's Environmental Health Standards for the Management of Hazardous Waste is included in CCR Title 22, Division 4.5. All hazardous waste generators must comply with the guidelines, as enforced by DTSC, for identifying, labeling, accumulating, preparing, and preventing outcomes related to hazardous waste.

Cortese List

Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop a list of sites with hazardous waste and substances (Cortese List). This includes DTSC- and H&SC-identified hazardous waste sites; Department of Health Services-listed contaminated public drinking water wells; SWRCB-listed underground storage tank (UST) leaks, solid waste facilities, and hazardous waste sites; and other sites as designated by various other ~~s~~State and local governments. Government Code Section 65962.5 requires the Cortese List to be updated at least annually. The Cortese List complies with the CEQA requirements by providing information about the location of hazardous material releases.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne) restricts the disposal of waste or any other activity that may degrade waters of the ~~s~~State. Porter-Cologne requires the cleanup of wastes that are below hazardous concentrations but capable of affecting the quality of surface water and groundwater (§ 13002). Porter-Cologne established nine Regional and State Water Boards, which are primarily responsible for protecting water quality in California. Regional Water Boards regulate discharges by issuing permits through NPDES for waste discharge requirements for nonpoint-source discharges. Anyone discharging materials or proposing to discharge materials that could affect water quality must file a report of waste discharge, unless the discharge would be into a community sewer system.

Hazardous Waste Control Act (§ 25100 et seq.)

DTSC is responsible for enforcing the Hazardous Waste Control Act (H&SC § 25100 *et seq*.), which creates the framework under which hazardous wastes are managed in California. The law provides for the development of a ~~s~~State hazardous waste program that administers and implements the provisions of the federal RCRA cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent, than federal requirements.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (H&SC Chapter 6.11 §§ 25404–25404.9) provides authority to the Certified Unified Program Agency (CUPA). The County of San Diego, Department of Environmental Health and Quality, Hazardous Materials Division (HMD), has been the CUPA for San Diego County since 1996 (County of San Diego 2021). The Unified Program consolidates six ~~s~~State-regulated environmental programs into one program under CalEPA. The six programs are:

- Aboveground Petroleum Storage Act (APSA) Program,
- California Accidental Release Prevention (CalARP) Program,
- Hazardous Materials Business Plan (HMBP) Program,
- Hazardous Materials Management and Inventory Program,
- Hazardous Waste and Hazardous Waste Treatment Program, and
- UST Program.

California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal/OSHA) and the federal OSHA are the agencies responsible for assuring safety in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards apply to construction activities.

California Labor Code (Division 5, Parts 1, 6, 7, and 7.5)

The California Labor Code is a collection of regulations that include regulation of the workplace to ensure appropriate training on the use and handling of hazardous materials and operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who oversee handling hazardous materials are appropriately trained and informed with respect to the materials they handle. Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

California Building Code and Fire Code

The California Fire Code (CFC), CCR Chapter 9, Title 24, was created by the California Building Standards Commission and based on the International Code Council-created International Fire Code. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The CFC regulates the use, handling, and storage of hazardous materials at fixed facilities. The CFC and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to promote fire and protect life safety. These measures involve construction standards, property line separation, and specialized equipment. To ensure that the safety measures are met, the CFC employs a permit system, based on hazard classification. The CFC is updated every 3 years.

The CFC includes requirements for building construction and vegetation management within designated Wildlife Urban Interface (WUI) areas. In such areas, all new buildings must comply with the CBC, which defines building construction requirements to reduce wildfire exposure. In addition, buildings within the WUI must comply with California laws and regulations that require maintenance of a "defensible space" of 100 feet from structures (PRC § 4291; CCR § 1299.03). In particular, Chapter 7A establishes minimum standards for the protection of life and property by increasing the ability of a building in an FHSZ and an SRA or WUI fire area to resist the intrusion of flames or burning embers projected by a vegetation fire. Therefore, the CFC contributes to a systematic reduction in conflagration losses.

4.9.3.3 Regional

San Diego County Code Title 6, Division 8

San Diego County Code of Regulatory Ordinances Title 6, Division 8, Chapters 8 through 11, establishes the HMD as the local CUPA. The HMD, which is responsible for public health, safety, and the environment, inspects businesses or facilities that handle or store hazardous materials, generate hazardous waste, generate medical waste, and own or operate USTs. HMD also administers the California Accidental Release Prevention Program and the Aboveground Petroleum Storage Act Program and provides specialized instruction to small businesses through its Pollution Prevention Specialist. HMD has the authority under ~~s~~State law to inspect facilities with hazardous materials or hazardous waste and, in cases where a facility is in noncompliance with the applicable ~~s~~State law or regulations, take enforcement action.

Projects are required to notify HMD regarding the use, handling, release (i.e., spills), storage, or disposal of hazardous materials and hazardous waste in accordance with existing ~~s~~State law and County ordinance. The notification is the initial step in the HMD permitting process, which requires businesses to obtain and maintain a Unified Program Facility Permit if they handle or store hazardous materials, are part of the California Accidental Release Prevention Program, generate or treat hazardous wastes or medical waste, store at least 1,320 gallons of aboveground petroleum, or own or operate USTs. The applicant requesting a permit must use the State of California Environmental Reporting System and submit the online request within 30 days.

If a building permit is required, California Government Code Section 65850.2 prohibits building departments from issuing a final Certificate of Occupancy to businesses or facilities that handle hazards materials unless they have submitted and met the requirements of a hazardous materials

business plan. The plan contains detailed information on the storage of hazardous materials at regulated facilities and serves to prevent or minimize damage to public health, safety, and the environment from a release or threatened release of a hazardous material. The hazardous materials business plan also provides emergency response personnel with adequate information to help them better prepare and respond to chemical-related incidents at regulated facilities.

San Diego County Emergency Operations Plan

The Operational Area Emergency Operations Plan describes a comprehensive emergency management system that provides for a planned response to situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts related to various emergency situations, identifies components of the Emergency Management Organization, and describes overall responsibilities for protecting life and property and ensuring the overall well-being of the population. The plan also identifies sources of outside support which might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, ~~s~~State and federal agencies, and the private sector.

The plan cites authorities and references to support the plan, which has five objectives:

1. Provide a system for the effective management of emergency situations;
2. Identify lines of authority and relationships;
3. Assign tasks and responsibilities;
4. Ensure adequate maintenance of facilities, services, and resources; and
5. Provide a framework for adequate resources for recovery operations.

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk-assessment process, identifies hazards present in the jurisdiction, and provides hazard profiles and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in ~~the~~San Diego County, including all cities and the County ~~unincorporated areas.~~. For the ~~unincorporated portions of the County 13~~County's hazard mitigation plan, 4 goals have been developed ~~for their hazard mitigation plans~~:

~~1. Promote disaster-resistant future development.~~

~~2. Increase public understanding and support for effective hazard mitigation,~~

1. ~~Build and support~~Foster safe, sustainable, and thriving environments,
2. Reduce the possibility of damages and losses to existing assets (such as people, critical facilities/infrastructures, and county-owned facilities,
3. Enhance local capacity and commitment to become less vulnerable to all hazards~~,~~ and

~~4. Enhance hazard mitigation coordination and communication with federal, state, local, and tribal governments.~~

~~The remaining nine goals reduce the potential for damage and loss involving existing assets—particularly people, critical facilities and infrastructure, and County-owned facilities—due to:~~

~~5. Dam failure,~~

~~6. Earthquake and liquefaction,~~

~~7. Coastal storms/erosion/tsunami,~~

~~8. Landslides,~~

~~9. Floods,~~

~~10. Structural fires/wildfires,~~

~~11. Extreme weather and drought,~~

~~12. Manmade hazards, and~~

~~13. Hazardous materials releases.~~

4. Promote regional culture of hazard understanding, support, and preparedness.

These 4 goals have 23 corresponding prioritized actions which have been identified to reduce hazards and improve community safety. Prioritized actions include but are not limited to:

- Limit Development in Floodplains and Other Hazardous Areas: County Department of Public Works (DPW) will continue to limit development of park structures and facilities in floodplains and other hazardous areas.
- Invasive and Noxious Weed Control (Vegetation Management): The County Department of Agriculture, Weights & Measures will continue to promote cooperative vegetation management programs that promote hazard mitigation will be critical in continue to mitigate wildfire risks from vegetation.
- Hazard Mitigation Action Adoption: County Planning & Development Services (PDS), County FPD, County Technology Office, County Communications Office, and County Office of Emergency Services will publicize and encourage the adoption of appropriate hazard mitigation actions throughout the region.
- MSCP Open Space Acquisitions Efforts: County DPR will continue open space acquisition efforts, such as purchasing land that could be preserved/protect natural resources and undeveloped land in high hazard areas.
- San Diego County Fire Community Emergency Response Team's Community Emergency Preparedness Outreach Program: Utilize County FPD's Community Emergency Response Team (trained and background checked volunteers) to conduct in-person outreach training, events, and activities bringing emergency preparedness information to underserved populations in their rural communities.
- The California Wildfire Mitigation Program - Home-Hardening Initiative: County FPD is currently working with the California Governor's Office of Emergency Services to pilot the California Wildfire Mitigation Program Home-Hardening Initiative. The Home Hardening Initiative aims to perform defensible space and retrofit measures on existing residential homesites to mitigate against wildfire losses. This program targets high social-vulnerability communities and provides financial assistance to qualifying low- and moderate-income households. This pilot program will be implemented in three highrisk areas within San Diego County: Dulzura, Potrero, and Campo.

San Diego County Wildland–Urban Interface Fire Emergency Response Plan

The San Diego County Fire Chiefs' Association and the San Diego County Police Chiefs' and Sheriff's Association are responsible for approving the San Diego County Wildland–Urban Interface Fire Emergency Response Plan, which is the County's standard emergency response and evacuation management plan format for wildfire. Staff are encouraged to become familiar with the plan and be prepared to integrate with public safety responders in response to emergencies. Park personnel are urged to develop additional emergency response plans consistent with the plan as well as the means and methods necessary for emergency communications with the public. Staff should consider the evacuation and "trigger point" criteria in the plan and determine if additional time will be required to mobilize internal staff and implement the plan. (~~p~~Please see Section 4.20, *Wildfire*, for a detailed assessment of the San Diego County Wildland-Urban Interface Fire Emergency Response Plan~~).~~)

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

This ordinance addresses issues associated with an accumulation of weeds, rubbish, and other materials on private property that creates a fire hazard and could be injurious to the health, safety, and general welfare of the public. Under the ordinance, the presence of such weeds, rubbish, and other materials is a public nuisance that requires abatement in accordance with the provisions of this section. The ordinance is enforced in all ~~county service areas~~County Service Areas (CSAs) as well as unincorporated areas ~~of the County~~ that are outside a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many have adopted 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 Protection District, in partnership with CAL FIRE, the Bureau of Land Management, and the U.S. Forest Service, is responsible for enforcing defensible space inspections. Inspectors from CAL FIRE are responsible for the initial inspection of properties, ensuring that an adequate defensible space has been created around structures. If violations of program requirements are noted, inspectors provide a list of required corrective measures and a reasonable timeframe for completing the task. If violations still exist upon reinspection, 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; it contains County and fire protection district amendments to the CFC. The purpose of consolidation with respect to the adoptive ordinances of the County and local fire districts is to promote consistency in the interpretation and enforcement of the CFC and protect public health and safety. This involves permit requirements for the installation, alteration, or repair of fire-protection systems and penalties for violations of the code. The Consolidated Fire Code provides minimum requirements for access, water supply and distribution, construction, fire-protection systems, and vegetation management. Additionally, it regulates hazardous material and provides associated measures to ensure that public health and safety are protected from incidents related to hazardous substance releases.

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

Following the October 2003 wildfires, the ~~County DPR's~~County's Department of Planning and Land Use (now ~~Planning and Development Services~~PDS) incorporated several fire prevention strategies into the discretionary project review process for CEQA projects. One of the more significant changes is the requirement ~~that~~for most discretionary permits (e.g., subdivision and use permits) in WUI areas to include a fire protection plan for review and approval. A fire protection plan is a technical report that considers the topography, geology, combustible vegetation (i.e., fuel types), climatic conditions, and fire history at the project location. The plan addresses the following (among others) in terms of compliance with applicable codes and regulations: water supply, primary and secondary access, travel time to the nearest fire station, ~~structure~~distance structures are setback from property lines, ignition-resistant building features, fire-protection systems and equipment, impacts on existing emergency services, defensible space, and vegetation management.

4.9.3.4 Local

Alpine Fire Protection District Ordinance

The ~~Alpine FPD~~AFPD was formed in 1957 to provide fire protection for the community of Alpine. Its Board of Directors created the ~~Alpine FPD~~AFPD Ordinance (No. 2020-01), which adopted the CFC, including Appendices B, C, H, I, and K; the International Fire Code; and National Fire Protection Association Standards 13, 13-R, and 13-D, as referenced in Chapter 80 of the CFC, together with ~~Alpine FPD~~AFPD amendments. The CFC is adopted for the protection of public health and safety. The ~~Alpine FPD~~AFPD Ordinance (No. 2020-01) includes additions, insertions, deletions, and changes to sections and chapters of the CFC.

Alpine Community Wildfire Protection Plan

The original Alpine Community Wildfire Protection Plan was developed by the Alpine Public Safety Committee, a subcommittee of Supervisor Dianne Jacob's Alpine Revitalization Committee, with guidance and support from the U.S. Forest Service, CAL FIRE, California Department of Transportation, County OES, County ~~Department of Planning and Land Use (now Planning and Development Services~~PDS, County Sheriff's Department, ~~Alpine FPD~~AFPD, Viejas Fire Department, and ~~Greater~~ Alpine Fire Safe Council. The intent of the plan is to optimize the use of scarce resources (i.e., money, people, equipment) to achieve the greatest overall benefit to the community (Alpine Public Safety Committee 2021). The primary goal is to prioritize projects, as follows:

- Defensible space around structures,
- Defensible space along evacuation routes, and
- Hazardous fuels reductions.

A key element of the planning strategy is to link together existing and future fuel-reduction projects so they can provide contiguous corridors of protection along a perimeter surrounding the Alpine area. The areas being linked together involve defensible space projects for community homes and evacuation routes, natural and/or human-made fuel breaks created through agency efforts, and burned areas. Priority is then given to those areas that can achieve the greatest degree of protection with the limited resources available.

Alpine Community Plan

The *Alpine Community Plan* (County of San Diego 2020) amended on December 14, 2016, outlines guidelines and policies for development within the community plan area. The policies and recommendations that apply to wildfire risk are as follows:

Safety Policy 3. Encourage development with fire-preventive development practices and fire resistant plant types.

Safety Policy 4. Consider fire hazards in Alpine a serious and significant environmental impact during review of Environmental Impact Reports.

Conservation Policy 13. Encourage the continuation of support for the brush management program in conjunction with other public agencies to reduce wildfire hazards.

4.9.4 Project Impact Analysis

4.9.4.1 Methodology

The project would develop Alpine Park and associated trails and conserve approximately 73 acres of open space~~/preserve~~ land. The following discussion evaluates impacts associated with hazards and hazardous materials should the project be implemented. With respect to existing conditions, the analysis assesses direct and indirect impacts related to hazards and hazardous materials using the thresholds presented below. To address wildfire risk under Threshold 7, a Fire Protection Memorandum was completed for the project by Dudek in July 2026 (Appendix J1), which includes fire behavior modeling and research about best practices for managing wildfire risk to assess the effectiveness of the project's vegetation fuel modification and human activity fire prevention measures.

4.9.4.2 Thresholds of Significance

Appendix G of the CEQA Guidelines

Based on guidance provided in Appendix G of the CEQA Guidelines, the project would result in a significant impact if it would:

1. Create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.
4. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard for the public or the environment.

5. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport, public use airport, or private airstrip, result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

County of San Diego Guidelines for Determining Significance

The following *County of San Diego Guidelines for Determining Significance, Hazardous Materials and Existing Contamination* (County of San Diego 2007), guide the evaluation of whether a significant impact related to hazardous substances and existing contamination would be likely to occur as a result of project implementation. A project will generally be considered to have a significant effect if it proposes any of the items listed below, absent specific evidence to the contrary. Conversely, if a project does not propose any of the items, it will generally not be considered to have a significant effect related to hazardous substances and existing contamination, absent specific evidence of such an effect.

1. The project is a business, operation, or facility that would handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in USTs regulated under Chapter 6.7 of the H&SC and therefore would not be able to comply with applicable hazardous substance regulations.
2. The project is a business, operation, or facility that would handle regulated substances that are subject to CalARP Risk Management Plan requirements and, in the event of a release, could adversely affect children's health due to the presence of a school or day-care facility within 0.25 mile of the project.
3. The project is on or within 0.25 mile of a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.519 or otherwise known to have been the subject of an investigation regarding a release of hazardous substances and, as a result, may result in a significant hazard for the public or the environment.
4. The project proposes structures for human occupancy and/or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill (excluding burn sites) and, as a result, would create a significant hazard for the public or the environment.
5. The project is proposed on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash) and, as a result, would create a significant hazard for the public or the environment.
6. The project is proposed on or within 1,000 feet of a formerly used defense site and it has been determined that it is probable that munitions or other hazards are located on the site that could represent a significant hazard for the public or the environment.
7. The project could result in human or environmental exposure to soil or groundwater that exceeds U.S. EPA Region 9 Preliminary Remediation Goals, CalEPA California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants; therefore, exposure would represent a hazard for the public or the environment.

8. The project would involve the demolition of commercial, industrial, or residential structures that may contain asbestos-containing materials, lead-based paint, and/or other hazardous materials and, as a result, represent a significant hazard for the public or the environment.

4.9.4.3 Project Impacts and Mitigation Measures

Threshold 1: Implementation of the project would not create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials.

County Park and Trails

Impact Discussion

Construction

Project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must comply with applicable regulations, such as those discussed under Section 4.9.3, *Applicable Laws and Regulations*. Although small amounts of hazardous materials would be transported, used, and disposed of during the construction phase, these materials are typically used in construction projects and would not represent the transport, use, and disposal of acutely hazardous materials. In addition, best management practices (BMPs) would be employed during construction to prevent spills of hazardous materials into the surrounding environment, as required by the project-specific Stormwater Pollution Prevention Plan (SWPPP) to be prepared under the Construction General Permit (Order No. 2009-009-DWQ, NPDES No. CAS000002, as amended by Order 2010-014-DWQ and 2012-06-DWQ). Therefore, potential construction impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

Operation

The project would develop Alpine Park and associated trails and conserve approximately 73 acres of open space~~/preserve~~ land. Facilities within Alpine Park would include multi-use turf areas, a baseball field, an all-wheel parea~~k~~, bike skills area, recreational courts (i.e., for basketball, pickleball), fitness stations, leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging area with a corral, a nature play area, a community garden, a volunteer pad, picnic areas with shade structures and picnic tables, a game table plaza, and trails. Operations associated with the project (i.e., restrooms, ranger station, administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These could include common materials such as toners, paints, restroom cleaners, and other maintenance materials. Grounds and landscape maintenance within the project area would use a variety of commercial products that are considered to be hazardous materials, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides. These products would not be stored or used in quantities that would result in a significant release. Any spills involving these materials would be small, localized, and cleaned up as they occur. Furthermore, the transport, use, and disposal of hazardous materials would comply with all applicable federal, ~~s~~State, and local regulations. Therefore, potential operational impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

Impact Determination

The project would not result in a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Open Space~~/Preserve~~

Impact Discussion

Construction

Project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must comply with applicable regulations, such as those discussed in Section 4.9.3, *Applicable Laws and Regulations*. Although small amounts of hazardous materials would be transported, used, and disposed of during the construction phase, these materials are typically used in construction projects and would not represent the transport, use, or disposal of acutely hazardous materials. In addition, BMPs would be employed during construction to prevent spills of hazardous materials into the surrounding environment, as required by the project-specific SWPPP to be prepared under the Construction General Permit (Order No. 2009-009-DWQ, NPDES No. CAS000002, as amended by Order 2010-014-DWQ and 2012-06-DWQ). Therefore, potential construction impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

Operation

Operation of the project's open space~~/preserve~~ portion is not anticipated to require the use of hazardous materials. Therefore, potential operational impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

Impact Determination

The project would not result in a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Implementation of the project would create a significant hazard for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

County Park and Trails

Impact Discussion

Construction

As discussed in Section 4.9.2. *Existing Conditions*, a review of the GeoTracker and EnviroStor online databases identified one EnviroStor listing within the project site, High School No. 12, Study Area B, Wright's Field, at 2480 South Grade Road in Alpine. There are no other listed hazardous material sites within the project footprint or within a 0.25-mile radius of the project site. A March 20, 2008, letter from DTSC to the Grossmont Union High School District concluded that there were no hazardous material releases or presence of naturally occurring hazardous materials at the project site. However, there was no information in the letter regarding soil testing, and, due to the former agricultural uses present on the project site, there could potentially be residual soil contamination from the historic use of herbicides or pesticides. Ground-disturbing construction activities could potentially result in the release of contaminated soil into the environment (**Impact HAZ-1**). Therefore, construction impacts would be potentially significant.

Operation

Once operational, the project would not be expected to create a significant hazard for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As discussed under Threshold 1, the project would use hazardous materials such as toners, paints, restroom cleaners, fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides during operation. Since proper procedures would be adhered to, it is unlikely that such materials would be stored or used in quantities that would result in a release of any significance. Any spills involving these materials would be small, localized, and cleaned up as they occur. Furthermore, the transport, use, and disposal of hazardous materials would comply with all applicable federal, ~~s~~State, and local regulations, which would reduce the risk of hazardous material releases. Therefore, operational impacts would be less than significant.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Construction of the project would potentially result in the release of contaminated soil into the environment. Impacts would be potentially significant.

Mitigation Measures

MM-HAZ-1: Prepare and Implement a Soil Management Plan. Prior to the commencement of soil-disturbing construction activities, the County will retain a licensed professional geologist, professional engineering geologist, or professional engineer with experience in contaminated site redevelopment and restoration to prepare and submit a soil and groundwater management

plan to the County for review and approval. After the County's review and approval, the County will implement the soil and groundwater management plan, which will include the following:

- A *Site Contamination Characterization Report* (Characterization Report) delineating the vertical and lateral extent and concentration of residual contamination from the site's past uses in areas where soil would be disturbed. The Characterization Report will include a compilation of data, based on a historical records review and prior reports and investigations, and, where data gaps are found, new soil and groundwater sampling to characterize the existing vertical and lateral extent and concentration of residual contamination.
- A *Soil Testing and Profiling Plan* (Testing and Profiling Plan) for materials that will be disposed of during construction. All potential contaminants of concern will be tested, including CCR Title 22 metals, polycyclic aromatic hydrocarbons, volatile organic compounds, herbicides, pesticides, polychlorinated biphenyls, or any other potential contaminants, as specified within the Testing and Profiling Plan. The Testing and Profiling Plan will document compliance with CCR Title 22 for proper identification and segregation of hazardous and solid waste as needed for acceptance at a CCR Title 22-compliant off-site disposal facility. All excavation activities will be actively monitored by a registered environmental assessor for the potential presence of contaminated soils and compliance with the Testing and Profiling Plan.
- A *Soil Disposal Plan* (Disposal Plan), which will describe the process for excavation, stockpiling, dewatering, treating, loading, and hauling of soil from the site. This plan will be prepared in accordance with the Testing and Profiling Plan (i.e., in accordance with CCR Title 22, CCR Title 27, DOT Title 40 CFR Part 263), and current industry best practices for the prevention of cross-contamination, spills, or releases. Measures will include, but not be limited to, segregation into separate piles for waste profile analysis based on organic vapor and visual and odor monitoring.
- A *Site Worker Health and Safety Plan* (Safety Plan) to ensure compliance with 29 CFR Part 120, Hazardous Waste Operations and Emergency Response, regulations for site workers at uncontrolled hazardous waste sites. The Safety Plan will be based on the characterization report and planned site construction activity to ensure that site workers who are potentially exposed to contamination in soil are trained, equipped, and monitored during site activities. Training, equipment, and monitoring will ensure that workers will not be exposed to contaminants above personnel exposure limits established by Table Z, 29 CFR Part 1910.1000. The Safety Plan will be signed by and implemented under the oversight of a ~~s~~State certified industrial hygienist.

Level of Significance After Mitigation

Impact HAZ-1 would be reduced to less than significant after implementation of **MM-HAZ-1,** which would ensure preparation and implementation of a Soil Management Plan.

Open Space~~/Preserve~~

Impact Discussion

Construction and Operation

Because ground-disturbing construction activities are not proposed as part of the project's open space~~/preserve~~ portion, this project component would not create a significant hazard for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact Determination

The open space~~/preserve~~ component would not result in a significant hazard for the public or the environment. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Implementation of the project <u>would</u> emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

County Park and Trails

Impact Discussion

Construction

Nearby schools include Joan MacQueen Middle School, approximately 0.4-mile west of the project site at 2001 Tavern Rd in Alpine, and Boulder Oaks Elementary School, approximately 0.7-mile west of the project site at 2320 Tavern Rd. As mentioned under Threshold 1, project construction would involve the routine handling of hazardous materials such as solvents, paints, oils, grease, and caulking. These materials must be handled in compliance with applicable regulations, such as those discussed in Section 3.8.2, *Regulatory Setting*. Small amounts of these materials would be handled during construction; however, these are typical for construction projects and would not include acutely hazardous materials. In addition, BMPs would be employed during construction (e.g., parking and refueling vehicles and equipment in one area, practicing good housekeeping, properly disposing of hazardous waste) to prevent spills of hazardous materials into the surrounding environment.

As discussed previously, the project site does not have a history of onsite contamination; however, a Soil Management Plan would be prepared to evaluate potential for contaminated soils on the project site associated with former agricultural uses (**MM-HAZ-1**). Because the Soil Management Plan **<u>(MM-HAZ-1)</u>** would ensure proper handling of potentially contaminated soils during construction, and routine handling of hazardous materials would be in compliance with applicable regulations,

impacts from emissions or handling of hazardous materials near schools would be reduced to less than significant.

Operation

Operations associated with the project (i.e., restrooms, ranger station, administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These could include common materials such as toners, paints, restroom cleaners, and other maintenance materials. Grounds and landscape maintenance within the project area would use a variety of commercial products that are considered hazardous materials, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides. These products would not be stored or used in quantities that would result in a significant release. Any spills involving these materials would be small, localized, and cleaned up as they occur. Therefore, potential operational impacts associated with emissions or the handling of hazardous materials near schools would be less than significant.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Ground-disturbing construction activities could potentially result in impacts from emissions or the handling of hazardous materials near schools. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impact-HAZ-1 would be reduced to less than significant after implementation of **MM-HAZ-1**, which would ensure the proper handling of potentially contaminated soils during construction as well as the proper handling of hazardous materials near schools.

Open Space~~/Preserve~~

Impact Discussion

Construction and Operation

Because ground-disturbing construction activities are not proposed as part of the project's open space~~/preserve~~ portion, this project component would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would ~~not~~ create a significant hazard for the public or the environment.

County Park and Trails

Impact Discussion

Construction and Operation

As discussed under Threshold 2, a review of the GeoTracker and EnviroStor online databases only identified one EnviroStor listing within the project site, High School No 12, Study Area B, Wrights Field, at 2480 South Grade Road in Alpine. There are no other listed hazardous materials sites within the project footprint or a 0.25-mile radius of the project site. This site's potential impact to the project is analyzed under Threshold 2. With implementation of **MM-HAZ-1**, the project site is not anticipated to create a significant hazard for the public or the environment.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impacts would be less than significant.

Open Space~~/Preserve~~

Impact Discussion

Construction and Operation

Because ground-disturbing construction activities are not proposed as part of the open space~~/ preserve~~ portion of the project, this project component is not anticipated to create a significant hazard for the public or the environment.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 5: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport, public use airport, or private airstrip, the project would not result in a safety hazard or excessive noise for people residing or working in the project area.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

Construction and Operation

The project is not within an airport land use plan or within 2 miles of a public airport or public use airport (San Diego County Regional Airport Authority 2021). The nearest airport to the project site is On the Rocks Airport (1CA6), approximately 4.5 miles southeast of the project site (AirNav.com 2021). Therefore, the project is not anticipated to result in a safety hazard or excessive noise due to proximity to an airport, and no impact would occur.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 6: The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

Construction and Operation

South Grade Road serves as a regional route for evacuation traffic and carries significant traffic daily (Rohde and Associates 2020). As discussed in Section 4.17, *Transportation and Circulation*, a transportation impact study (TIS) was prepared by CR Associates in April 2020 to identify vehicular impacts associated with the operation of the project (CR Associates 2020). The TIS was performed in accordance with the County of San Diego Traffic Impact Guidelines. No significant impacts related to traffic were identified in the TIS. Therefore, the project would not interfere with the operational

area emergency plan or the multijurisdictional hazard mitigation plan. Furthermore, the project would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 7: The project <u>would not</u> expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

For additional analysis of wildfire hazards, please see Section 4.20, *Wildfire*. According to CAL FIRE's Fire Hazard Severity Zones in SRA Map, the project site is in a VHFHSZ (CAL FIRE 2007). Rohde and Associates prepared an FEOA on June 25, 2021, to identify wildfire risks at the project site (Appendix J) (Rohde and Associates 2021). <u>As noted above, t</u>~~T~~he FEOA identified the following site-specific wildfire and ignition risks at the project site:

- Proximity to South Grade Road, a known location with human-related fire ignition factors;
- Adjacency of the site to significant human activity, including homes and ranches;
- Robust public usage of the site for both dispersed and organized recreation;
- Location of the park site with respect to historical major wildfire corridors;
- Heavy fuel concentrations on some County/<u>Wright's Field Preserve</u> ~~BCLT~~ lands;
- Current off-road parking and occasional vehicle trespass; and
- Potential increase in demands on local public safety resources as a result of developed park use.

<u>These specific risks are analyzed in the *Operation* discussion below.</u>

Construction

As noted, the project site is partially within a VHFHSZ. Heat or sparks from construction equipment and vehicles, as well as the use of flammable materials, have the potential to ignite adjacent vegetation and start a fire, especially during weather events with low humidity and high wind speeds that are typically experienced in the summer and fall, but can occur year-round in the San

Diego region. County DPR and its contractors would implement standard BMPs for the mitigation of potential ignition sources. Such BMPs include the following:

- All vehicles would be required to carry a fire extinguisher in case of accidental fire ignition,
- Vehicles would not be permitted to park or idle over dry brush, and
- Proper wildfire awareness, reporting, and suppression training will be provided to construction personnel.

Implementation of standard BMPs would reduce the potential for ignition and increase the ability of on-site workers and staff to control and extinguish a wildfire event. Therefore, construction of the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Operation

Operation of the project could introduce new conditions that could exacerbate wildfire risk at the project site. While development of the project would reduce the fuel load on the project site by developing natural habitat with a built environment, operation of the project would introduce visitors to the project site who were not previously present. Given the high percentage of wildfires in Southern California that are ignited by human-related causes, this could exacerbate existing wildfire risks on the site. ~~(please see Section 4.20, Wildfire, for a detailed assessment of the wildfire risk and its management). The measures discussed below would also be in effect.~~

The project would comply with ~~County Code of Regulatory Ordinances~~ Title ~~3~~9, Division ~~5, Chapter 3, as well as Appendix IIA~~1, of the ~~Uniform Fire Code~~CFC. Furthermore, County DPR would be required to comply with the Defensible Space for Fire Protection Ordinance (County of San Diego 2011). That ordinance would require~~s~~ combustible vegetation; dead, dying, or diseased trees; green waste; rubbish; or other flammable materials to be cleared within 30 feet of the property line and within 10 feet of each side of a highway, private road, or driveway in order to maintain defensible space (County of San Diego 2011). The project would also be required to comply with the County of San Diego Fire Service Conditions stipulated by County Fire Services personnel (i.e., County Fire Marshall) upon review and approval of the project.

Access to the park has been designed in coordination with County DPR, ~~the~~ County ~~Department of Public Works~~DPW, and County Fire Services personnel to ensure accommodation for large pieces of fire apparatus and horse trailers as they enter and exit. In addition, as part of project operations, signs with park rules and regulations would be clearly posted, in compliance with County Code of Regulatory Ordinances Title 4, Public Property, Division 1, Parks and Recreation, Chapter 1, County Parks and Recreation. The rules, which would be enforced by park employees as described in Section 4.17.4.3, would include, but not be limited to, the following:

- Smoking would be prohibited.
- Campfires and open flames would be prohibited, and barbeques would be locked on red-flag days. County DPR has procedures for the enforcement of "open flame bans," which are initiated by declaration of a red-flag warning. County DPR would integrate signage and other interpretive stations at key site entrance points, indicating red-flag conditions when announced by fire agencies. When a warning is issued, region managers would reach out to the field staff and begin the process of shutting down all barbeques by signing and banning/taping them off until the

warning is lifted. Additional signage would be posted at park entrances and throughout the park. Park personnel would patrol the park to enforce the ban.

- No person would be allowed to use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County park.
- Parking would occur in designated staging areas.

County DPR would prepare a Site Evacuation Plan as part of operational planning for the project. The Site Evacuation Plan would include emergency contact information, evacuation routes and established meeting places, and safety protocols to ensure the safe evacuation of visitors and employees of the park. County DPR would also implement recommendations provided in the FEOA prepared by Rohde and Associates for the project as outlined below.

Because the project would introduce potential ignition sources to a previously undeveloped open space area, fire prevention protocols would be implemented as part of the project. The following fire prevention protocols, which were recommended in the Rohde and Associates assessment, would be implemented as fire prevention measures~~project design features~~:

- Facility Fire-Safe Design. County DPR shall design appropriate facility elements and ensure County fire and building code compliance to reduce wildfire risks for users and the area. The proposed f~~F~~ire-resistive landscaping would create a fire-safe area where the two dog parks, ~~three soccer~~open fields, and baseball diamond are proposed. In addition, the paved parking lot, basketball and pickleball courts, equestrian area, and other cleared areas would not only provide a buffer that would protect the park from wildfire but also provide a temporary safe refuge area with safe ingress and egress (Rohde and Associates 2021).
- Fire-Resistive Landscaping. All landscape vegetation on park premises would be consistent with the guidelines of the County ~~Department of Planning and Development Services~~PDS as well as the County's approved fire-resistive landscape plant palette. Generally, these plants would:
    - Grow close to the ground;
    - Have a low sap or resin content;
    - Grow without accumulating dead branches, needles, or leaves;
    - Be easily maintained and pruned;
    - Be drought tolerant;
    - Be responsive to adequate irrigation to maintain a "green" state; and
    - Not present intense thermal outputs during combustion.
- Safe Refuge Sites. The proposed p~~P~~arking and equestrian areas would naturally serve as emergency safe routes, providing broad expanses of non-combustible surfaces. These areas would be free of combustible ground cover and cleared of native vegetation whenever possible. Because equestrians would most likely use County facilities as temporary safe refuge sites during wildfires, the equestrian facility would need to be designed to be both substantial and fire resistive so as to provide secure and safe housing for large animals and prevent accidental releases due to animal panicking during wildfires.

- Fuel Modification Program. County DPR shall implement a long-term fuel modification program. This management would be accomplished on a scale needed to alleviate identified fire behavior potential while limiting environmental impacts from the treatment and offering the highest protection value for the expense and effort. The goals of this fuel modification program would be to reduce wildfire intensity enough to offer reasonable protection to adjacent structural assets, limit landowner liability from wildfire damage to adjoining properties, provide protection for DPR/BCLT site development, and ensure safe public refuge at key sites. Existing fuel modification maintenance includes a 30-foot buffer of vegetation clearance along the frontage of South Grade Road on the County property and a 100-foot buffer of vegetation clearance and defensible space at adjoining properties along the northern boundary of the County-owned parcel, as directed by ~~the Alpine FPD~~AFPD Defensible Space Requirements (Alpine FPD 2022). This document is attached as Appendix L. While the AFPD Defensible Space Requirements have been updated since 2022, as described below, the proposed 30-foot and 100-foot buffers remain in compliance with the most recent requirements. ~~The County will specifically implement a 100-foot buffer of vegetation clearance that extends from the volunteer pad, an additional 20-foot buffer of vegetation clearance adjoining the 30-foot buffer of vegetation clearance (total of 50-foot buffer clearance) adjacent to the roadside within the proposed park footprint, as well as a 20-foot buffer adjoining the 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel in order to reduce hazards associated with increased human-related fire ignition factors. The aggregate 50-foot vegetation clearance and 30-foot vegetation clearance also reduce an extension of wildfire from the historical wildfire corridor on the east face of the site.~~

- Fuel Reduction Zones. The project also shall achieve ~~Zone A–~~ compliant fuel modification around the Alpine Park facility per fire and building code requirements, with the goal of 100 percent fire exclusion from the project site. The objective of the landscape replacement ~~in Zone A will be~~is to eliminate the potential for wildfire occurrence through establishment of a fire-resistive landscape around principal park facilities and structures at the minimum distances required by code. This has been designed through the proposed landscape around sports fields and buildings, subject to ~~Alpine~~AFPD Fire Marshal review and approval during the permitting process (Rohde and Associates 2021). ~~Zone B fuel reduction shall occur adjacent to Zone A along property lines, where practical, and around key public facilities such as the parking areas, equestrian staging areas, and similar locations. Fuel modification in Zone B should be designed to achieve fire prevention goals while maintaining viable habitat and preserving ecological values. The objective of fuel treatment in Zone B is to achieve at least a 75 percent reduction in fire-line intensity from a wildfire moving from native fuels into a constructed fuel modification zone (Rhode and Associates 2021). The County will implement a 100-foot fuel reduction area extending from the volunteer pad under Zone A and Zone B compliance.~~ The AFPD Defensible Space requirements were recently updated to include Zone 0 Immediate Zone, Zone 1 Intermediate Zone, and Zone 2 Extended Zone. Zone 0, comprised of the first five feet extending outward from an exterior wall, is required to be maintained clear and free of all combustible materials. Zone 0 would include the removal of existing vegetation. Zone 1 begins at the end of Zone 0 and extends to 50 feet. Zone 1 does not need to be free of combustible materials, however plants and vegetation in this zone must be maintained. The AFPD includes height and diameter restrictions, as well as requires vegetation in this zone to be irrigated and maintained so that dead or dying vegetation and plants are removed. Finally, Zone 2 is an additional 50 feet, beginning at the edge of Zone 1. Zone 2 has less strict requirements than the other zones, but

still requires active maintenance of vegetation, limbing trees dependent on the height of the tree, and the removal of combustible vegetation below the tree canopy.

- Fuel Modification Criteria: A–O in FEOA (Appendix J)
    - Treatment Methods. County DPR shall implement one or more of the recommended treatment method alternatives, including:
        - Mechanical treatment, including mowing or plowing, may be used to establish fuel modification in grass where terrain is within the mechanical limits of equipment to extend parking lot or equestrian staging area clearance for safe refuge.
        - Grazing for grass and lighter fueled sites such as sage scrub in the south half or northwest quarter.
        - Hand treatment by hand crews is recommended for steep sites and sites with heavy fuels such as shrub fuel and steep-sloped areas in the northwest quarter of the combined site.
        - Spot control with herbicides. Herbicides would be used to control undesired weeds or selective vegetation within fuel modification areas.
- Partner Collaboration for Fire Prevention. County DPR shall coordinate with neighboring entities, including BCLT, ~~Greater~~ Alpine Fire Safe Counsel, the ~~AlpineFPD~~AFPD, San Diego County FPD, CAL FIRE, County ~~Road Department~~DPW, and San Diego Gas & Electric, on regional defensible-space initiatives, fuel modification, and structural defense initiatives, including sharing of resources, planning, and costs.
- Comply with the Regional Wildfire and Evacuation Plan (see Section 4.20, *Wildfire*). The San Diego County WUI Fire Emergency Response Plan has been updated for the Alpine southeast area as a part of the Rohde and Associates FEOA (Appendix J). This document, which is also approved by the San Diego County Fire Chiefs Association and San Diego County Police Chiefs' and Sheriff's Association ~~and~~, is the County standard emergency response and evacuation management plan ~~format~~ for wildfire. County DPR shall implement the project in compliance with the plan.
- Comply with Site-Specific Wildfire and Evacuation Plan. An Alpine Community Park Fire Evacuation Analysis was developed by Chen Ryan Associates (Appendix K) to assess the time required for emergency evacuation from the project site under several scenarios, assuming a wind-driven fire that results in a required evacuation affecting the project site and surrounding community. The traffic evacuation simulations presented within the analysis found that evacuation traffic generated by the project would not significantly increase the average evacuation travel time or result in unsafe evacuation timeframes. Evacuation flow would be able to be effectively managed.

As described in Appendix J1, fire behavior modeling of four potential fire scenarios was completed under post-development conditions that include removal of hazardous vegetation and installation of landscaping consistent with a park use that also complies with the required fuel modification standards of the AFPD. There is no situation where the project would be built without defensible space and fuel modification as required by applicable codes; as such, these required features were included in the fire behavior modeling. In addition, the project includes existing and additional

vegetation fuel modification fire prevention measures, which are also assumed to be implemented in the vegetation fuel modification fire behavior modeling:

- EXISTING: Continued maintenance of an existing 30-foot buffer where vegetation has been cleared adjacent to the roadside along the County property, which has been historically cleared and is required by AFPD.

- EXISTING: Continued maintenance of a historically cleared and existing 100-foot buffer where vegetation has been cleared where there are adjoining properties along the northern boundary of the County-owned parcel, which is required by AFPD and is not part of this project.

- REQUIRED BY CODE: Creation of a 100-foot vegetation buffer, as part of the project, that would extend from the volunteer pad.

- ADDITIONAL: An additional 20-foot buffer adjacent to the existing 30-foot buffer along the park footprint for a total of 50 feet of reduced vegetation cover.

- ADDITIONAL: An additional 20-foot buffer adjacent to the existing 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel.

In addition to the vegetation fuel modification fire prevention features described above, the project also proposes human activity fire prevention measures. The existing swing gates and weekly ranger checks described in Section 4.9.2.5 would be replaced by a stronger vehicle control barrier and a live-on volunteer, maintenance staff, and a park ranger to help with maintenance and management of the property. The following required and additional human activity fire prevention measures are proposed for the project:

- REQUIRED BY CODE: Prohibition of smoking (County Code of Regulatory Ordinances Section 41.118.5).

- REQUIRED BY CODE: Prohibition of the use of barbecues when a Red Flag Warning has been issued (County Code of Regulatory Ordinances Section 41.118).

- REQUIRED BY CODE: Prohibition of the use, transport, carrying, firing, or discharging any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into the park except as authorized under Section 41.117 of the County Code of Regulatory Ordinances (County Code of Regulatory Ordinances Section 41.117).

- ADDITIONAL: Prohibition of campfires and open flames.

- ADDITIONAL: Prohibition of overnight use of the park.

- ADDITIONAL: Strengthening of the vehicle control barriers and provision of improved fire-safe parking.

  ADDITIONAL: A live-on volunteer, maintenance staff, and a park ranger to help with maintenance and management of the property who will also monitor and enforce the following:

As detailed in Appendix J1, four wildfire scenarios were modeled for vegetation types under three conditions: 1) the existing baseline condition, 2) the project with the fire prevention measures

required by the applicable building and fire codes, and 3) the project with the additional fire prevention measures proposed by the County. The project proposes all of the fire prevention features listed above, but a separate analysis of the project with only the required fire prevention measures represents a "pre-mitigation" condition that can be used to assess project impacts in the absence of mitigation. Research about human behavior and ignition risk was also conducted to assess the effectiveness of the human activity fire prevention measures implemented in the three conditions above. The existing condition is described in Section 4.9.2.5 above. A discussion of the effectiveness of the project's fire prevention measures for the project with the required fire prevention measures and for the project with the additional fire prevention measures is provided below.

Project with Required Fire Prevention Measures

The project would be required to implement certain fire prevention measures mandated by building and fire codes, which would convert existing hazardous vegetation fuels to maintained landscaping and vegetation fuel modification zones that meet code requirements. The same four wildfire scenarios were modeled for the project with the required vegetation fuel modification fire prevention measures listed above. The only vegetation fuel modification measures that are not required by the relevant codes is vegetation modification within two 20-foot vegetation buffer areas adjacent to the existing 30-foot buffer along the park footprint and the existing 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel. The analysis for the project condition with the required fire prevention measures assumes that the vegetation in the buffer would remain unmaintained flat-topped buckwheat and fire activity in the additional 20-foot buffer areas would remain the same as the existing condition.

Modeling results demonstrate that in the project with the required vegetation fuel modification measures condition, flame lengths in areas with vegetation modification would be reduced by approximately 4.6 feet to 12 feet depending on the location. Similarly, fire intensity in the fuel modification areas would be reduced by up to 3,008 BTU/feet/second; rate of spread would be reduced by up to 4 mph; and ember spotting distance would be reduced by up to 0.8 miles compared to the existing condition.

Regarding ignition and human activity, the project is anticipated to lead to additional human presence at the site, which could increase fire risk by introducing additional opportunities for human-caused fire ignitions. However, the project would be subject to the restrictions in the County Code of Regulatory Ordinances, which prohibits ignition sources such as smoking or fireworks. On-site signage would inform visitors about the prohibited activities on the project site. The existing weekly ranger checks would enforce these prohibitions using clear communication and direct verbal warnings, which would also present opportunities for education about fire dangers. Ongoing enforcement, education, and signage would increase public awareness about the restrictions on the project site, minimizing ignition potential even when rangers are not present. Still, due to the lack of a daily enforcement presence, the occasional unauthorized access of the project site is not expected to be meaningfully reduced for the project with required fire prevention measures condition, meaning some ignition potential would still exist for this hypothetical condition. However, the irrigated and managed landscaping proposed for the project reduces the risk of an on-site ignition becoming an off-site wildfire by replacing a nearly continuous field of hazardous, easily ignited vegetation with ignition-resistant landscaping arranged in accordance with defensible space and fuel modification requirements. The project with required fire prevention measures would

implement defensible space requirements and vegetation modification to ensure that impacts related to wildfire would be less than significant, with no mitigation required.

Project with Additional Fire Prevention Measures

The only vegetation fuel modification fire prevention measures that exceed code requirements are the additional 20-foot buffer areas. These buffer areas would further reduce fire activity on the project site by providing more area with maintained landscaping and irrigation. The proposed project would result in a reduction in buffer area flame lengths (3 feet compared to 18 feet without the vegetation modification), fire intensity (up to 63 BTU/feet/second compared to up to 3,037 BTU/feet/second without the vegetation modification), rate of spread (0.2 mph compared to up to 6.2 mph without the vegetation modification), and ember spotting (up to 0.3 miles compared to up to 1.1 miles without the vegetation modification) compared to existing conditions.

Regarding ignition and human activity, the project includes fire prevention measures that exceed the requirements of the County Code of Regulatory Ordinances, as listed above. Additional measures include a live-on volunteer, maintenance staff, and a park ranger to help with maintenance and management of the property; strengthened vehicle control barriers and fire-safe parking; and the prohibition of campfires and overnight use of the park. As described in Appendix J1, one of the most effective means of reducing ignitions is to combine effective education with judicious enforcement. Pairing restrictions (such as the prohibition of smoking) with on-site enforcement personnel establishes a comprehensive compliance framework by providing the legal authority necessary to support enforcement actions and penalties for violations; active monitoring and enforcement capacity to identify noncompliance and request compliance or summoning assistance from law enforcement; and direct public education and outreach that promotes awareness of regulations and reduces the likelihood of future violations. With the additional vegetation fuel modification and human activity fire prevention measures, impacts related to wildfire would continue to be less than significant, with no mitigation required.

Implementation of the project, including the aforementioned fire prevention measures~~project design features~~, compliance with applicable ordinances and regulations, and enforcement of County DPR rules and regulations would reduce the potential for the project to expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Impact Determination

Implementation of the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 8: The project would not be a business, operation, or facility that would handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in Underground storage tanks regulated under Chapter 6.7 of the H&SC, and the project would comply with applicable hazardous substance regulations.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

As discussed above under Threshold 1, project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Potential construction impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant. Operations associated with the project (i.e., restrooms, ranger station, administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These products would not be stored or used in quantities that would result in a significant release. Potential operational impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant. The project would not propose a business, operation, or facility that would handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in USTs regulated under Chapter 6.7 of the H&SC. The project would comply with applicable hazardous substance regulations.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 9: The project would be a business, operation, or facility that would handle regulated substances subject to CalARP Risk Management Plan requirements that in the event of a release could adversely affect children's health due to the presence of a school or day care within one-quarter mile of the facility.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

As discussed under Threshold 3, nearby schools include Joan MacQueen Middle School, approximately 0.4 mile west of the project site at 2001 Tavern Road, Alpine, and Boulder Oaks Elementary School, approximately 0.7 mile west of the project site at 2320 Tavern Road. Project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Operations associated with the project (i.e., restrooms, ranger station, administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These materials would be stored or used in quantities that would not result in a significant release. Any spills involving these materials would be small, localized, and cleaned up as they occur. As discussed under Threshold 2, ground-disturbing construction activities could potentially result in a release of contaminated soil into the environment (**Impact HAZ-1**). Therefore, construction impacts would be potentially significant.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Ground-disturbing construction activities could potentially result in impacts from emissions or handling of hazardous materials near schools. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impact-HAZ-1 would be reduced to less than significant after implementation of **MM-HAZ-1**, which would ensure the proper handling of potentially contaminated soils during construction as well as the proper handling of hazardous materials near schools.

Threshold 10: The project would be located on or within one-quarter mile of a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.519 or otherwise known to have been the subject of a release of hazardous substances and, as a result, the project may result in a significant hazard for the public or the environment.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

As discussed under Thresholds 2 and 4, a review of the GeoTracker and EnviroStor online databases only identified one EnviroStor listing within the project site, High School No 12, Study Area B, Wrights Field, at 2480 South Grade Road, Alpine. There are no other listed hazardous materials sites within the project footprint or a 0.25-mile radius from the project site. This site's potential impact ~~pm~~on the project is analyzed under Threshold 2. With implementation of **MM-HAZ-1**, the project site is not anticipated to create a significant hazard for the public or the environment.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 11: The project does not propose structures for human occupancy and/or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill (excluding burn sites) and, as a result, the project would not create a significant hazard for the public or the environment.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

The project does not propose structures for human occupancy and/or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill (excluding burn sites). Therefore, it would not create a significant hazard for the public or the environment.

Impact Determination

There would be no impact.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

There would be no impact.

Threshold 12: The project is not proposed on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash) and, as a result, the project would not create a significant hazard for the public or the environment.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

The project site is not on or within 250 feet of a parcel identified as containing burn ash (from the historic burning of trash). Therefore, it would not create a significant hazard for the public or the environment.

Impact Determination

There would be no impact.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

There would be no impact.

Threshold 13: The project would not be proposed on or within 1,000 feet of a formerly used defense site and munitions or other hazards are not located on site that could represent a significant hazard for the public or the environment.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

The project site is not on or within 1,000 feet of a formerly used defense site. Therefore, it would not represent a significant hazard for the public or the environment.

Impact Determination

There would be no impact.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

There would be no impact.

Threshold 14: The project could result in human or environmental exposure to soil or groundwater that exceeds U.S. EPA Region 9 Preliminary Remediation Goals, CalEPA California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants and the exposure would represent a hazard to the public or the environment.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

As discussed under Threshold 2, ground-disturbing construction activities could potentially result in the release of contaminated soil into the environment (**Impact HAZ-1**), thereby resulting in human or environmental exposure to contaminated soil. Soil at the project site could potentially exceed U.S. EPA Region 9 Preliminary Remediation Goals, CalEPA California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants. Therefore, construction impacts would be potentially significant.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impact HAZ-1 would be reduced to a less-than-significant level after implementation of **MM-HAZ-1**, which would ensure preparation and implementation of a Soil Management Plan.

Threshold 15: The project would not involve the demolition of commercial, industrial, or residential structures that may contain asbestos-containing materials, lead-based paint, and/or other hazardous materials and, as a result, the project would not represent a significant hazard for the public or the environment.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

The project would not involve the demolition of commercial, industrial, or residential structures.

Impact Determination

There would be no impact.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

There would be no impact.

4.9.5 Summary of Significant Impacts

Table 4.9-1. Summary of Significant Hazards and Hazardous Materials Impacts and Mitigation Measures

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact HAZ-1: Potential Release of Contaminated Soil	**MM-HAZ-1: Prepare and Implement a Soil Management Plan**	Less than Significant	**MM-HAZ-1** would ensure proper identification, handling, and disposal of contaminated soils if encountered on the project site.