

## 4.8 Hazards and Hazardous Materials

This section of the EIR describes the existing hazardous materials, airport, wildland fire and emergency response and evacuation plan conditions in the proposed project area. This section also analyzes the proposed project and its potential to have a significant impact on public safety, health or the environment. Information contained in the following section has been incorporated from Cortese List Data Resources, the Multi-Jurisdictional Hazard Mitigation Plan for San Diego County (URS 2004), the City of Escondido's Emergency Action Plan for City Employees, and additional resources as cited throughout the section.

A summary of the hazards and hazardous materials impacts identified in Section 4.8.3, Analysis of Project Impacts and Determination of Significance, is provided below.

### Hazards and Hazardous Materials Summary of Impacts

Issue Number	Issue Topic	Project Direct Impact	Project Cumulative Impact	Impact After Mitigation
1	Transport, Use and Disposal of Hazardous Materials	Less than Significant	Less than Significant	Less than Significant
2	Accidental Release of Hazardous Materials	Less than Significant	Less than Significant	Less than Significant
3	Hazards to Schools	Less than Significant	Less than Significant	Less than Significant
4	Existing Hazardous Materials Sites	Less than Significant	Less than Significant	Less than Significant
5	Public Airports	Less than Significant	Less than Significant	Less than Significant
6	Private Airports	Less than Significant	Less than Significant	Less than Significant
7	Emergency Response and Evacuation Plans	Less than Significant	Less than Significant	Less than Significant
8	Wildland Fires	Less than Significant	Less than Significant	Less than Significant

### 4.8.1 Existing Conditions

This section of the EIR is divided into four discussions of potential hazards to public safety and the environment: hazardous materials, airports, wildland fires and emergency response and evacuation plans. The discussion on hazardous materials describes sites with known hazardous materials issues, sites with potential hazardous materials issues, hazardous materials transportation, hazardous materials disposal and hazardous materials release threats. The discussion on airports examines existing nearby airport facilities and potential operational hazards within the vicinity of the proposed project area. The wildland fires discussion examines fire threat hazards, wildland/urban interface areas, and the history of wildland fires in the proposed project area and surrounding area. Finally, the discussion on emergency response and evacuation plans identifies operations and plans that exist to protect lives and property in the event of a disaster within the proposed project area or surrounding area.

### 4.8.1.1 Hazardous Materials

Hazardous materials are commonly stored and used by a variety of businesses and are commonly encountered during construction activities. Hazardous materials typically require special handling, reuse, and disposal because of their potential to harm human health and the environment. The California Health and Safety Code (HS&C) defines a hazardous material as:

“Any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. “Hazardous materials” include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.” (H&SC Section 25501)

The following discussion outlines the existing hazardous materials conditions in the proposed project area.

#### Sites with Known Hazardous Materials Issues

A variety of government data sources are available to identify sites that may have been subject to a release of hazardous substances or that may have supported a use that could have resulted in a hazardous condition onsite. Listed below are some key sources of data that identify potential environmental conditions and historical uses that may represent a hazardous condition on specific properties.

1. Hazardous Waste and Substances sites from California Environmental Protection Agency (California EPA) Department of Toxic Substances Control (DTSC) EnviroStor database;
2. Leaking Underground Storage Tank (LUST) sites by city and fiscal year from the State Water Resources Control Board (SWRCB) GeoTracker database;
3. Active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the SWRCB;
4. Active and closed solid waste sites (Solid Waste Inventory System-SWIS database) maintained by the California Integrated Waste Management Board (CIWMB);
5. Solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit;
6. Hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (H&SC), identified by DTSC;
7. Hazardous Materials Establishment List maintained by the County of San Diego;
8. The County of San Diego maintains the Site Assessment and Mitigation (SAM) case listing of contaminated sites that have previously or are currently undergoing environmental investigations and/or remedial actions; and

9. Resource Conservation and Recovery Information System (RCRIS): A database of Resource Conservation and Recovery Act (RCRA) facilities that is maintained by California EPA.

As of January 2011, all databases listed above (with the exception of #5, list of solid waste disposal sites identified by SWRCB, and #6, list of hazardous waste facilities subject to corrective action by H&SC) have identified sites located in the proposed project area. Databases with sites located in the proposed project area are discussed below. Sites listed in the RCRIS and the Hazardous Materials Establishment List are not included in this discussion because information contained in these databases is repetitive of other databases.

#### **DTSC EnviroStor Database**

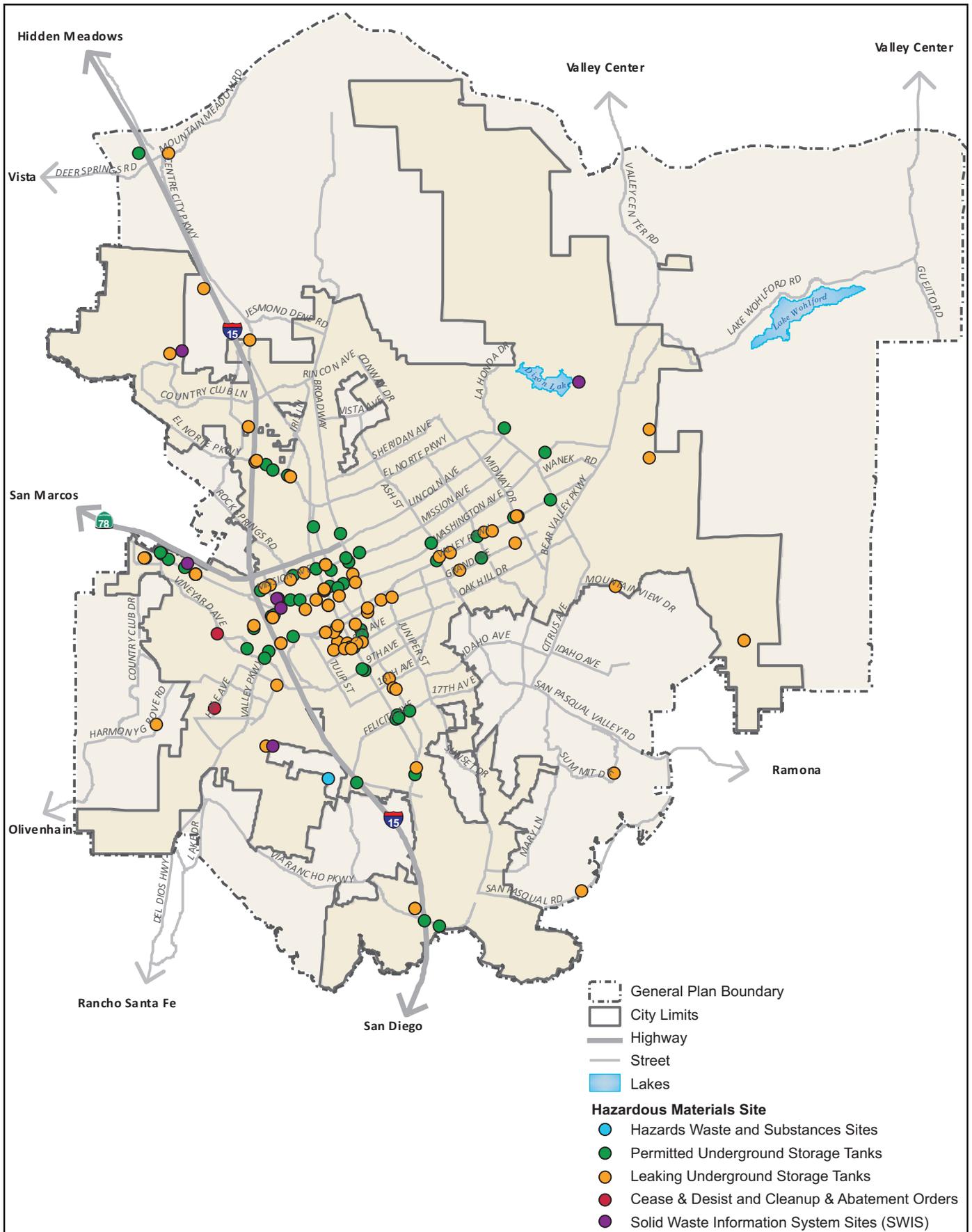
This list includes the following site types: federal Superfund sites (National Priorities List); state response, including military facilities and state Superfund; voluntary cleanup; and school sites. Information includes site name, site type, status, address, any restricted use (recorded deed restrictions), past use(s) that caused contamination, potential contaminants of concern, potential environmental media affected, site history, planned and completed activities. In the proposed project area, there is one site listed on the EnviroStor database. The listed site is the Chatham Brothers Barrel Yard, located at 2257 Bernardo Avenue and identified below in Figure 4.8-1, Existing Hazardous Material Sites, as a hazardous waste and substance site. Cleanup activity status is active for this site (DTSC 2011).

#### **GeoTracker Database**

The GeoTracker database is a geographic information system (GIS) that provides online access to environmental data including underground fuel tanks, land disposal sites, military sites, and permitted underground storage tanks (USTs). GeoTracker contains information about leaking underground fuel tanks (LUFT) and can identify and display LUFT sites within various distances of wells. This provides users with the ability to assess potential threats to their drinking water sources. GeoTracker also has information and data on non-LUFT cleanup programs, including Spills-Leaks-Investigations-Cleanups sites, Department of Defense (DOD) sites, and land disposal programs. In the proposed project area there are approximately 260 sites listed in the GeoTracker database, including approximately 60 permitted underground storage tanks and 70 LUFTs (City of Escondido GIS 2011 and GeoTracker 2011). In General, underground storage tanks and LUFTs are concentrated in the urban core/downtown portion of the proposed project area. Figure 4.8-1, Existing Hazardous Material Sites, identifies the location of permitted USTs and LUFT sites within the proposed project area.

#### **Active CDO and CAO List**

The list of active CDO and CAO from the SWRCB is a compilation of “all cease and desist orders issued after January 1, 1986, pursuant to Section 13301 of the California Water Code, and all cleanup or abatement orders issued after January 1, 1986, pursuant to Section 13004 of the Water Code, that concern the discharge of wastes that are hazardous materials.” The orders that are active, meaning the necessary actions have not yet been completed, are on this list. The SWRCB updates this list by deleting sites when there is no longer any discharge of wastes and/or where the necessary cleanup or abatement actions were taken. In the proposed project area, there are two active CDO and/or CAO sites listed (California EPA 2011), both of which are located southwest of the Interstate 15 (I-15)/State Route (SR) 78 interchange. Active CDO and CAO sites within the proposed project area are identified below in Figure 4.8-1, Existing Hazardous Material Sites.



Source: City of Escondido 2011



**EXISTING HAZARDOUS MATERIALS SITES**  
**FIGURE 4.8-1**

### **SWIS Database**

The SWIS database contains information on solid waste facilities, operations, and disposal sites throughout California. The types of facilities found in this database include landfills, closed disposal sites, transfer stations, materials recovery facilities, composting sites, transformation facilities, waste tire sites, and construction, demolition and inert debris facilities and operations. For each facility, the database contains information about location, owner, operator, facility type, regulatory and operational status, authorized waste types, local enforcement agency and inspection and enforcement records. There are seven facility/sites listed on the SWIS within the City limits or near vicinity, three of which are listed as closed and three of which are listed as active (SWIS 2011).

### **County of San Diego SAM Program**

The County SAM Program, administered by the Department of Environmental Health (DEH), has a primary purpose to protect human health, water resources, and the environment within the proposed project area by providing oversight of assessments and cleanups in accordance with the H&SC and the California Code of Regulations (CCR). The SAM's Voluntary Assistance Program also provides staff consultation, project oversight, and technical or environmental report evaluation and concurrence (when appropriate) on projects pertaining to properties contaminated with hazardous substances. The SAM list identifies contaminated sites that have previously or are currently undergoing environmental investigations and/or remedial actions.

The SAM Program covers all incorporated and unincorporated areas in San Diego County and includes remediation sites of all sizes. The SAM case listing is revised and updated regularly and the number of sites on the list is continually changing, but may contain upwards of 5,000 cases at one time. There is some overlap with the information in other regulatory databases; however, the list also contains sites that often are not covered by some of the larger regulatory databases. Within the proposed project area, approximately 320 sites are identified on the SAM case listing (DEH 2010).

## **Sites with Potential Hazardous Materials Issues**

A variety of historical land uses and conditions could potentially result in site contamination, representing potential hazards to humans and the environment when new land uses are proposed on those lands. Examples of historic land uses that have the potential to result in current site contamination include transfer stations, agricultural activities, and petroleum storage sites.

### **Transfer Stations**

Solid waste not placed directly in landfills is deposited temporarily in several privately operated transfer stations. One transfer station is located within the proposed project area which is operated by Escondido Disposal, Inc. Transfer stations play a vital role in accommodating throughput to landfills, and serving as collection and separation points for solid waste and recyclables.

### **Historic Agriculture**

Agricultural activities generally include the application of fertilizers, herbicides, and pesticides that have the potential to contaminate soil and groundwater. Soils contaminated by past agricultural activities are a growing concern, generally because of land use changes involving proposed housing developments on former agricultural lands. Pesticides from historic or nearby land use have the potential to leach into groundwater resources and cause contamination in public or private drinking water wells. Investigation

of suspected pesticide contamination on properties proposed for development typically includes soil and groundwater sampling in areas where materials were stored, handled, and mixed, in addition to identifying the historical crops grown, pesticides applied, and methods of application. The investigation and any remedial actions related to pesticide contamination focuses on the elimination of human or environmental exposure. Constituents of concern at former agricultural sites include organochlorine pesticides and metals, which may pose a human health risk.

### **Petroleum Storage**

Petroleum hydrocarbons are the most commonly used group of chemicals in society today. Petroleum hydrocarbons encompass a wide range of compounds including, but not limited to, fuels, oils, paints, dry cleaning solvents, and non-chlorinated solvents. These compounds are used in all facets of modern life and can cause soil and groundwater contamination if not properly handled. USTs and aboveground storage tanks (ASTs) that store petroleum are common sources of contamination into soils and groundwater. The presence of such contamination is typically identified during removal of these tanks. Property owners with USTs and ASTs on their land often include marketers who sell gasoline to the public, such as service stations and convenience stores, or non-marketers who use tanks solely for their own needs, such as fleet service operators or agricultural users. Leaking USTs can result in vapor intrusion from volatile organic compounds (VOCs) and benzene into homes when chemicals seep down into the soil and groundwater and travel through soil as vapor. These vapors may then move up through the soil and into nearby buildings, through cracks in the foundation, causing contamination of indoor air. While vapor intrusion is uncommon, it should be considered when there is a known source of soil or groundwater contamination nearby.

### **Hazardous Waste Transportation**

Transportation of hazardous materials by truck and rail is regulated by the U.S. Department of Transportation (USDOT). In California, unless specifically exempted, it is unlawful for any person to transport hazardous wastes unless the person holds a valid registration issued by the DTSC. Within the proposed project area, hazardous materials are transported along major freeways and surface street systems, including I-15 and SR-78.

The DTSC maintains a list of active registered hazardous waste transporters throughout the state. There are two registered hazardous waste transporters, Downstream Services, Inc. and Ingenium Group, LLC, within the proposed project area (DTSC 2011b). The process of transporting hazardous waste often involves transfer facilities. A transfer facility is any facility that is not an onsite facility that is related to the transportation of waste. These facilities include, but are not limited to, loading docks, parking areas, storage areas, and other similar areas. Although not all transfer facilities hold hazardous waste, any operator of a facility that accepts hazardous waste for storage, repackaging or bulking must obtain formal authorization for those activities through the hazardous waste permit process. Hazardous waste transporters are exempt from storage facility permit requirements as long as they observe the limits on storage time and handling. The Escondido Disposal, Inc. transfer station does not accept hazardous waste and there are no other transfer facilities that accept hazardous waste within the proposed project area.

### **Hazardous Materials Disposal**

Through the RCRA, Congress directed the EPA to create regulations that manage hazardous waste from “the cradle to the grave.” Under this mandate, the EPA has developed strict requirements for all aspects

of hazardous waste management including the recycling, treatment, storage, and disposal of hazardous waste. Facilities that provide recycling, treatment, storage, and disposal of hazardous waste are referred to as Treatment, Storage and Disposal Facilities (TSDF). Regulations pertaining to TSDFs are designed to prevent the release of hazardous materials into the environment and are more stringent than those that apply to generators or transporters. No TSDF sites exist within the proposed project area.

## **Hazardous Materials Release Threats**

When unexpectedly released into the environment, hazardous materials may create a significant hazard to the public or environment. Hazardous materials are commonly stored and used by a variety of businesses within the proposed project area and could be released into the environment through improper handling or accident conditions. The following business plans and response systems are in place to help prevent hazardous material release threats.

### **Hazardous Materials Business Plans**

Any business within the proposed project area that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a Hazardous Materials Business Plan (HMBP) that is submitted to County DEH for approval. HMBPs intend to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The applicable HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs. A HMBP includes three sections: 1) an inventory of hazardous materials, including a site map, which details their location; 2) an emergency response plan; and 3) an employee training program. HMBPs aid employers and employees in managing emergencies at a given facility. They also prepare emergency response personnel to handle a wide range of emergencies that might occur at the facility.

The Hazardous Materials Division of DEH conducts routine inspections at businesses required to submit HMBPs. The purpose of these inspections is to: 1) ensure compliance with existing laws and regulations concerning HMBP requirements; 2) identify existing safety hazards that could cause or contribute to an accidental spill or release; and 3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials. After initial submission of an HMBP, the business must review and recertify the HMBP every year.

According to the Multi-Jurisdictional Hazard Mitigation Plan for San Diego County, as of 2004 the City of Escondido had 826 facilities with DEH Hazardous Materials Permits, 396 facilities with EPA ID numbers (facilities that generate hazardous waste) and 560 facilities with approved HMBPs.

### **Risk Management Plans**

Article 2 of Chapter 6.95 of the H&SC (Sections 25531- 25543.3) requires the owner or operator of a stationary source with more than a threshold quantity of a regulated substance to prepare a Risk Management Plan (RMP). The state statutes and regulations combine federal and state program requirements for the prevention of accidental releases of listed substances into the atmosphere. The incorporation of the federal and state requirements have been designated the California Accidental Release Prevention (CalARP) Program. CalARP requires that a RMP include a hazard assessment program, an accidental release prevention program, and an emergency response plan. The RMP must be revised every five years or as necessary.

### **Hazardous Materials Emergency Response**

The County DEH Hazardous Incident Response Team (DEH-HIRT) consists of 10 California State Certified Hazardous Materials Specialists. The team was founded in 1981 by the Unified Disaster Council and is funded by a Joint Powers Agreement. This team services 18 municipalities, including Escondido, all unincorporated San Diego County areas, two military bases, and five Indian reservations. There are over 400 responses a year in the DEH-HIRT operational area. DEH-HIRT responds jointly with the San Diego Fire-Rescue Department HIRT to investigate and mitigate chemically related emergencies or complaints. Emergency response activities include mitigation, containment, control actions, hazard identification, and threat evaluation to the local population and the environment. DEH-HIRT is also responsible for handling all after normal business hours complaints for the DEH. Examples of DEH-HIRT duties include responses to sewage overflows in public water ways; foodborne illness investigations; asbestos and lead complaints; abandoned medical waste; water sampling; and vector control complaints (DEH 2011).

### **4.8.1.2 Airport Hazards**

The areas of concern when addressing airport hazards are over-flight safety, airspace protection, flight patterns and land use compatibility. Dealing with these concerns contributes to the overall safety of passengers, pilots and crews on flights, in addition to the safety of people on the ground. Hazards associated with airports can have serious human safety and quality of life impacts. The following section describes the airport types and locations within the vicinity of the proposed project area and the programs these facilities implement to prevent hazards.

### **Airports in the Proposed Project Area**

The Federal Aviation Administration (FAA) regulates airspace over the proposed project area. San Diego International Airport, located 30 miles south of the proposed project area serves as the region's primary facility for business and pleasure air travel. McClellan-Palomar Airport, located approximately 10 miles west of the proposed project area in the City of Carlsbad, accommodates private and smaller commercial aircraft on a scheduled basis. The Ramona Airport is located approximately 10 miles east of the proposed project area in the unincorporated community of Ramona. A small private airfield is also located within the proposed project area, northwest of Lake Wohlford. However, the Lake Wohlford Airstrip has no scheduled flight service. Additionally, a heliport is located within the proposed project area, at Palomar Medical Center, which allows patients to be flown in or out of the hospital by helicopter. Helicopter flights at Palomar Medical Center average 23 round-trips per month (PPH 2005).

Private airports within the vicinity of the proposed project area include Blackington Airport, a private air strip located in the Valley Center community, approximately three miles north of the proposed project area. A total of 12 single engine airplanes are based at the Blackington Airport for recreational use.

The closest military airports to the proposed project area include Marine Corps Air Station (MCAS) Camp Pendleton, located to the northwest of the proposed project area, and MCAS Miramar, located to the southwest of the proposed project area. Both of these airports are located approximately 12 miles from the proposed project area.

### **Ramona Airport**

The Ramona Airport is equipped with a single east-west runway capable of handling corporate jet aircraft. It also has a public practice helipad located south of the runway. During wildfire season,

usually May through November, the California Department of Forestry and Fire Protection (CalFire) and the U.S. Forest Service (USFS) operate one of the busiest aerial fire attack bases in the nation (air tankers and helicopters) at this airport. They stage much of their southern California fire protection operations from this location. The 342-acre facility has a single 5,000-foot paved runway. CalFire and USFS helicopters have exclusive use of two helipads at this facility.

### **McClellan-Palomar Airport**

McClellan-Palomar Airport primarily serves general aviation users, but also serves corporate aircraft. One commercial airline serves this airport, with Los Angeles as the sole service destination. Historically, Las Vegas, Laughlin, and Phoenix have been other destinations served by commercial carriers from this airport. There is also intense helicopter activity south of the runway. The airport has both short and long-term parking, with a shuttle bus running between the lots and terminals. The airport has a newly completed terminal which provides passenger airline services, rental cars, and restaurant services as well as U.S. Customs Services.

## **Public Airport Hazard Prevention**

Airport Land Use Compatibility Plans (ALUCPs) are plans that guide property owners and local jurisdictions in determining what types of proposed new land uses are appropriate around airports. They are intended to protect the safety of people, property and aircraft on the ground and in the air in the vicinity of the airport. They also protect airports from encroachment by new incompatible land uses that could restrict their operations. ALUCPs are based on a defined area around an airport known as the Airport Influence Area (AIA). AIAs are established by factors including airport size, operations, configuration, as well as the safety, airspace protection, noise, and overflight impacts on the land surrounding an airport. It is important to note that ALUCPs do not affect existing land uses. Structure replacement and infill development are generally permitted under ALUCPs, in accordance with policies established by the San Diego County Regional Airport Authority (SDCRAA). The ALUCP for the Ramona Airport was adopted by the SDCRAA in 2006 and last amended in 2008. The ALUCP for McClellan-Palomar Airport was adopted in 2010.

Airport safety zones are established for all public airports as part of the ALUCP and land use restrictions within safety zones are established to protect people and property on the ground and in the air. Safety zones were created to address the following three safety concerns:

1. **Protecting people and property on the ground.** Land use restrictions are implemented that include limiting the intensity of use, residential uses, and sensitive uses such as occupants with mobility issues and hazardous materials;
2. **Minimizing injury to aircraft occupants.** Land use controls are implemented to preserve useful open land in the vicinity of the airport for an off-airport emergency landing; and
3. **Preventing creation of hazards to flight.** Restrictions on building heights and objects in the approach and take-off flight paths are implemented, along with the limitation of land uses that would interfere with aircraft communication and navigation equipment or attract wildlife that pose a hazard to aircraft (such as large birds).

## Private Airport Hazard Prevention

Safety-related hazards at private airports, such as Lake Wohlford, affect less land because of lower activity levels compared to public use airports. In addition, the general public has very limited access to or ability to utilize these facilities due to their ownership by private citizens or public agencies. There are no AIAs identified around private airports and land use restrictions are much less defined than with public airports. Additionally, Caltrans' Division of Aeronautics (Caltrans DOA) controls private and special-use airports through a permitting process, and is also responsible for regulating operational activities at these airports.

### 4.8.1.3 Wildland Fire Hazards

A portion of the proposed project area supports natural habitats such as grasslands, sage scrub and chaparral. In the context of fire ecology, these areas are known as wildlands. Fire ecology research has shown that the natural fire regime for the shrublands and forests in the region was one of frequent small fires and occasional large fires. Modern society has interrupted and fractured the natural fire process by initiating fire suppression policies, introducing invasive plant species that burn readily such as eucalyptus trees, and building houses within or adjacent to wildland areas (known as wildland-urban interface (WUI) areas). Although fires can occur anywhere, fires that begin in wildland areas pose a serious threat to personal safety and structures due to rapid spread and the extreme heat that these fires often generate. Past wildfires within the proposed project area and surrounding region have taken lives, destroyed homes and devastated hundreds of thousands of acres of natural resources.

Wildfire hazard is particularly acute in the proposed project area because of the prolonged late spring through fall dry period experienced in southern California, and the occurrence of Santa Ana winds beginning during the late summer and extending into early spring. When wind velocities on hillside areas are great, temperatures are high, and relative humidity is low, fire hazard conditions become severe, and fires are difficult to extinguish. The risk of wildfire is greatest in areas of chaparral plant association because it grows densely and produces volatile emissions when heated (Cotton 2000).

The following section discusses the fire hazard potential in the proposed project area, current WUI conditions, and the history of wildland fires in the region. Information on the Escondido Fire Department is provided Section 4.14, Public Services.

### Fire Hazard Potential

CalFire has mapped areas of significant fire hazards in the state through their Fire and Resource Assessment Program (FRAP). These maps place areas of the state into different Fire Hazard Severity Zones (FHSZs) based upon fuels, terrain, weather, and other relevant factors. As part of this mapping system, land is classified as Federal Responsibility Areas (FRA), which are areas where the USFS is responsible for wildfire protection; State Responsibility Areas (SRAs), which are areas where the California Department of Forestry and Fire Protection (DFFP) is responsible for wildfire protection; and Local Responsibility Areas (LRAs) where local fire protection agencies, such as the Escondido Fire Department, are responsible for wildfire protection.

The FHSZs are divided into three levels of fire hazard severity: Moderate, High and Very High. As shown in Figure 4.8-2, Wildfire Risk, the majority of the proposed project area is classified with a High to Very High FHSZ. However, the majority of the downtown Escondido area is classified with a Moderate FHSZ.

According to San Diego's Multi-Jurisdictional Hazard Mitigation Plan, as of 2004 there were no people, residential buildings or commercial buildings at risk of Extreme wildfire hazard within the City of Escondido. However, this document states that as of 2004, within the City, a Very High wildfire hazard risk exists for 988 people and 485 residential buildings; a High wildfire hazard risk exists for 16,015 people, 5,846 residential buildings, and 20 commercial buildings; and a Moderate wildfire hazard risk exists for 127,927 people, 29,056 residential buildings, and 401 commercial buildings (URS 2004).

## Wildland Urban Interface

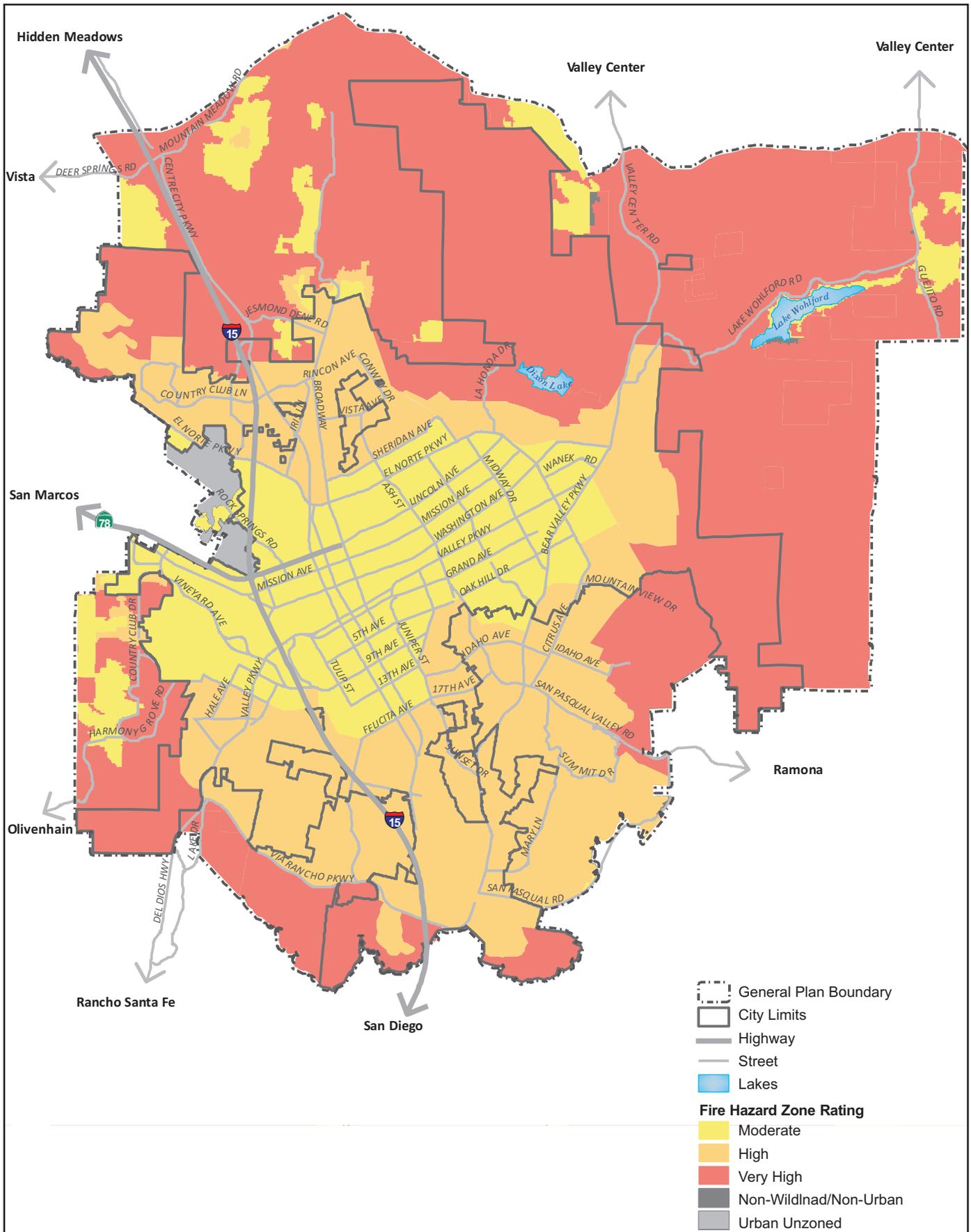
A WUI is an area where development is located in close proximity to open space or lands with native vegetation and habitat that are prone to brush fires. The WUI creates an environment in which fire can move readily between structural and vegetation fuels. Once homes are built within (or adjacent to) natural habitat settings, it increases the complexity of fighting wildland fires because the goal of extinguishing the wildland fire is often superseded by protecting human life and private property.

The WUI is composed of communities that border wildlands or are intermixed with wildlands and where the minimum density exceeds one structure per 40 acres. WUI communities are created when the following conditions occur: 1) structures are built at densities greater than one unit per 40 acres; 2) the percentage of native vegetation is less than 50 percent; 3) the area is more than 75 percent vegetated; and 4) the area is within 1.5 miles of an area greater than a census block (1,325 acres). The 1.5-mile buffer distance was adopted according to the 2001 California Fire Alliance definition of vicinity, which is roughly the distance that pieces of burning wood can be carried from wildland fire to the roof of a structure (UW 2008).

## Wildland Fire History

The San Diego region and the proposed project area have a long history of wildland fires. Figure 4.8-3, Wildfire History, identifies Wildland Fire History from 1910 through 2007 within the region. The 2007 San Diego County wildfires were the second largest in County history, superseded only by the devastating wildfires of October 2003. The wildfires started on October 21, 2007 near the U.S./Mexico international border and burned throughout San Diego County until the last fire was fully contained on November 9, 2007. At the height of the firestorms, there were seven separate fires burning in San Diego County. The 2007 Witch Creek Fire impacted the proposed project area.

The Witch Creek Fire occurred in the northeast portion of the proposed project area, and further east outside of the proposed project area. The Witch Creek Fire burned a total of 197,990 acres. Highway 78 was closed from Ramona to Escondido due to fire damage and the fire destroyed 1,125 residential structures and 509 outbuildings and damaged 77 residential structures and 25 outbuildings. Forty firefighters were injured in the Witch Creek blaze and two civilian deaths resulted. Fire response included 224 personnel, 25 fire engines, six fire crews, one bulldozer and three water tenders. Total cost, including fire fighting staffing and structural/property damage, was 18 million and cooperating agencies included the California Highway Patrol, San Diego County Sheriff's Department, American Red Cross, County of San Diego Animal Control, San Diego Police Department, San Diego Gas & Electric, Bureau of Indian Affairs, Bureau of Land Management, Department of Corrections and Rehabilitation, and various local fire agencies (CalFire 2007).

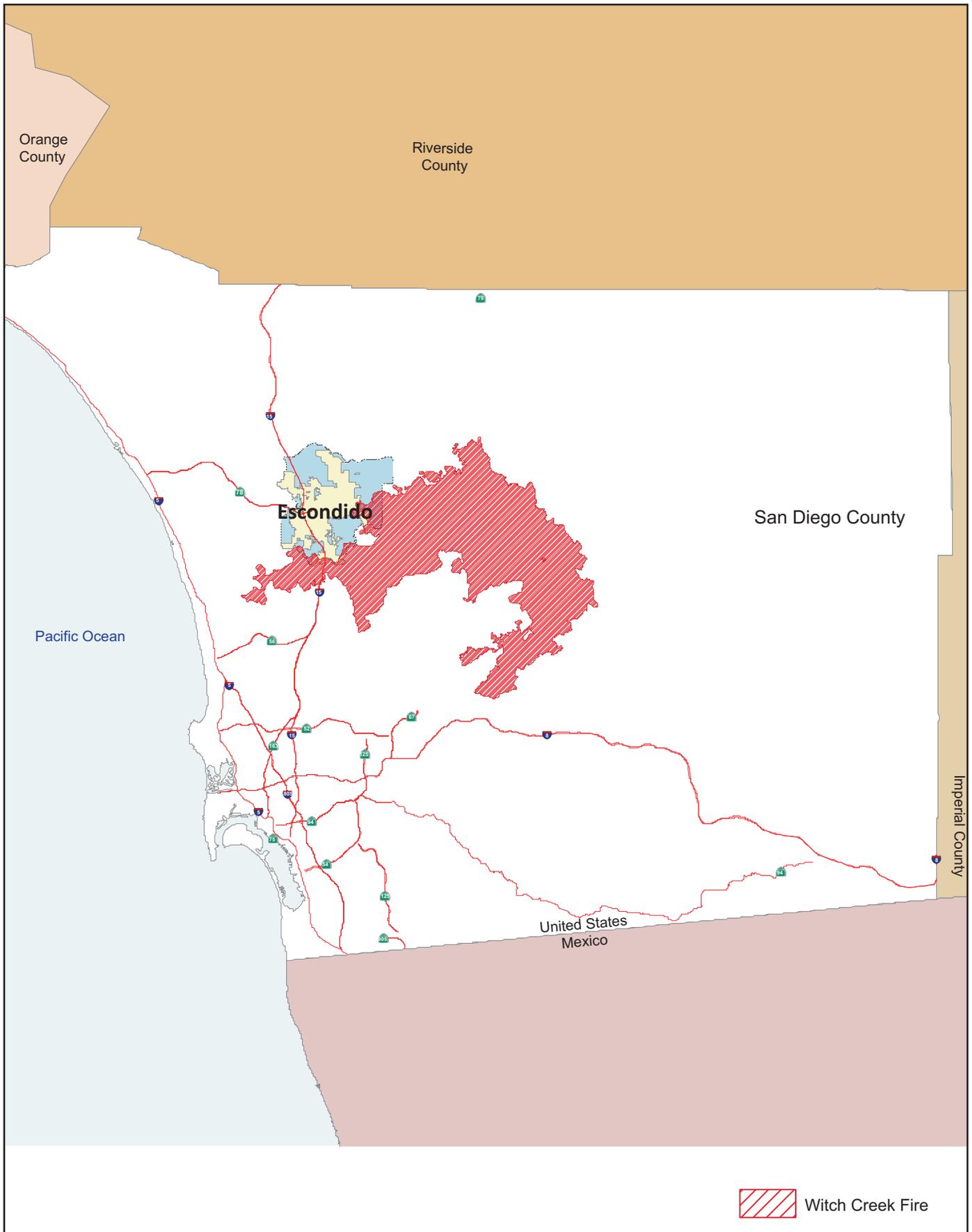


Source: City of Escondido 2011

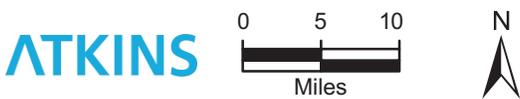


**ATKINS**

**WILDFIRE RISK  
 FIGURE 4.8-2**



Source: City of Escondido 2011



**WILDFIRE HISTORY**  
**FIGURE 4.8-3**

### 4.8.1.4 Emergency Response and Evacuation Plans

Emergency response plans include elements to maintain continuity of government, emergency functions of governmental agencies, mobilization and application of resources, mutual aid, and public information. Emergency response plans are maintained at the federal, state and local levels for all types of manmade and natural disasters. It is the responsibility of government to undertake an ongoing comprehensive approach to emergency management in order to avoid or minimize the effects of hazardous events. Local governments have the primary responsibility for preparedness and response activities.

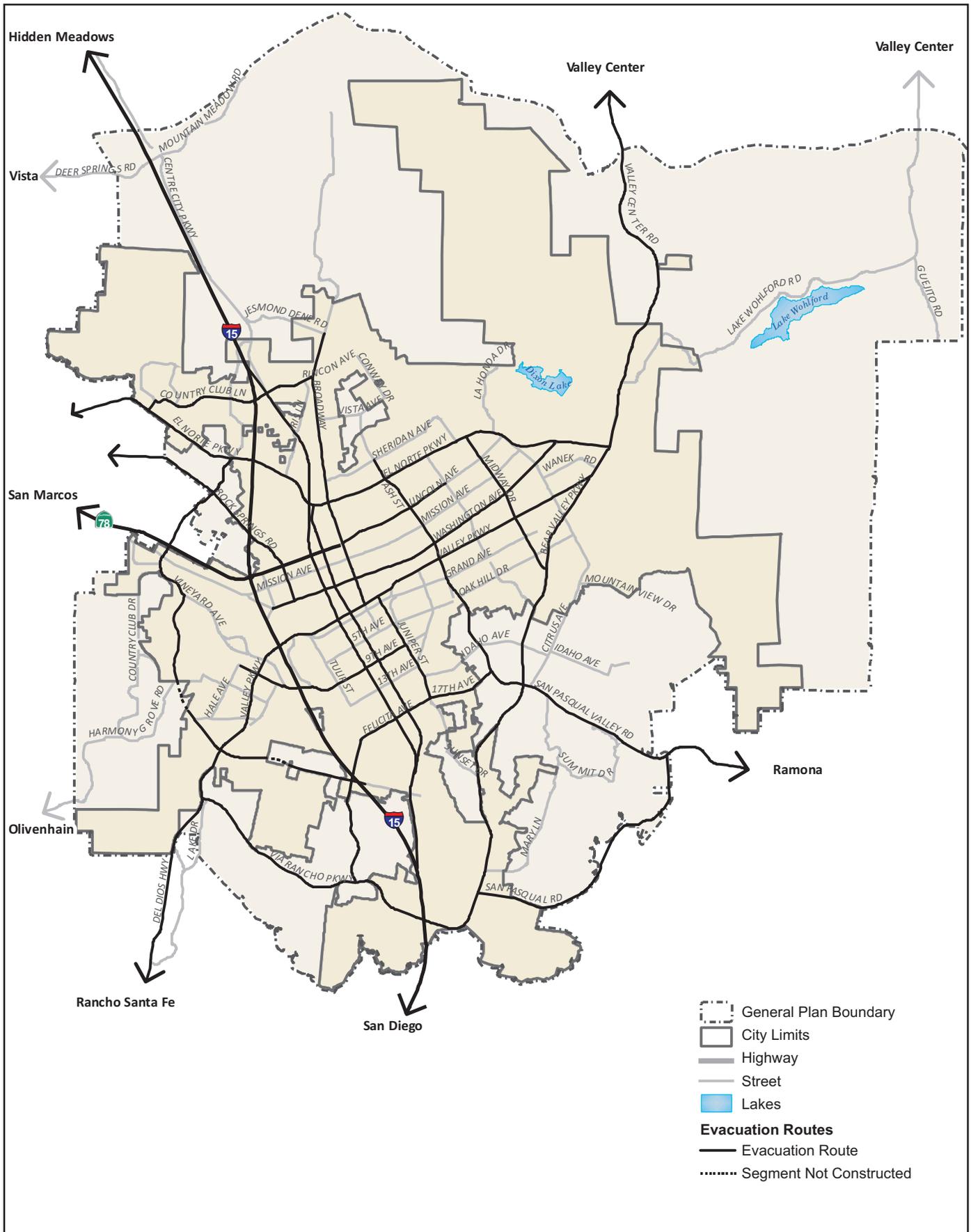
To address disasters and emergency situations at the local level, the Unified Disaster Council is the governing body of the Unified San Diego County Emergency Services Organization. The Council is chaired by a member of the San Diego County Board of Supervisors and comprised of representatives from the 18 incorporated cities, including Escondido.

Potential hazards or events that may trigger an emergency response action include earthquakes, tsunamis, floods, wildland fires, landslides, droughts, hurricanes, tropical storms and freezes. Emergency response actions could also be triggered from a hazardous material incident, water or air pollution, a major transportation accident, water, gas, or energy shortage, an epidemic, a nuclear accident, or terrorism. In the event of an emergency, emergency evacuation routes within the proposed project area include all roadways identified within the Mobility Element of the City's General Plan. Emergency evacuation routes within the proposed project area are shown below in Figure 4.8-4, Emergency Evacuation Routes.

### San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Mitigation Plan was developed with the participation of all jurisdictions in the County of San Diego, including Escondido. The plan includes an overview of the risk assessment process, hazards present in each jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction.

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



Source: City of Escondido 2011



**EMERGENCY EVACUATION ROUTES**  
**FIGURE 4.8-4**

## Operational Area Emergency Plan

In San Diego County, there is a comprehensive emergency plan known as the Operational Area Emergency Plan (OAEP). The OAEP describes a comprehensive emergency management system which provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of a comprehensive emergency management system and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the population. The OAEP is used by the County and the 18 incorporated cities within the County to respond to major emergencies and disasters (ESO 2010).

In addition to the above plans, the County of San Diego Office of Emergency Services (OES) maintains Dam Evacuation Plans for the operational area. Emergency plans for dam evacuation are necessary to plan for the loss of life, damage to property, displacement of people, and other ensuing hazards that can occur from dam failure. In the event of dam failure, damage control and disaster relief would be required and mass evacuation of the inundation areas would be essential to save lives. Dam inundation is further discussed in Section 4.9, Hydrology and Water Quality.

Dam evacuation plans contain information concerning the physical situation, affected jurisdictions, evacuation routes, unique institutions and event responses. In addition, the plans include inundation maps showing direction of flow; inundation area boundaries; hospitals, schools, multi-purpose staging areas; command posts/sites; and mass care and shelter facilities/sites. Unique institutions, as defined by the OES, include the following types of facilities: hospitals, schools, skilled nursing facilities, retirement homes, mental health care facilities, care facilities with patients that have disabilities, adult and childcare facilities, jails/detention facilities, stadiums, arenas and amphitheatres.

## City of Escondido Emergency Action Plan

As an employer, the City of Escondido maintains an Emergency Action Plan for City employees. The Emergency Action Plan includes the following elements: 1) preferred means of reporting fires and other emergencies; 2) names or regular job titles of persons who can be contacted for further information or an explanation of duties under the plan; 3) types of emergencies that may reasonably be expected in the workplace (e.g. fires, hurricanes, floods, chemical releases, and earthquakes); 4) emergency procedures encompassing situations that do not require an evacuation of the facility; 5) emergency escape procedures and emergency escape route assignments (primary and secondary routes); 6) verification of the audible and visual alarm system; 7) procedures to be followed by employees who remain to operate critical plant operations before they evacuate (emergency coordinator, searchers/assembly point coordinators, and maintenance); 8) procedures for communication during and after an emergency situation and/or evacuation; and 9) designated assembly points (EAP 2010).

## Escondido Community Emergency Response Team Program

The City Emergency Response Team (CERT) program is a joint effort between the Escondido Fire Department and the residents of Escondido to become better prepared for emergencies. CERT program instructors from the Escondido Fire Department provide emergency preparedness and response training to community members. CERT training prepares residents for natural disasters and acts of terrorism by teaching them how to put out small fires, assess damage to buildings, provide basic first aid and perform simple search and rescue operations. Graduates of the CERT program have the opportunity to become disaster volunteers with the City (EFD 2011).

## **4.8.2 Regulatory Framework**

### **4.8.2.1 Federal**

#### **Chemical Accident Prevention Provisions**

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. These rules, which built upon existing industry codes and standards, require companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program.

#### **Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendments and Reauthorization Act of 1986**

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, on December 11, 1980. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA on October 17, 1986. SARA stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites; required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations; provided new enforcement authorities and settlement tools; increased state involvement in every phase of the Superfund program; increased the focus on human health problems posed by hazardous waste sites; encouraged greater citizen participation in making decisions on how sites should be cleaned up; and increased the size of the trust fund to \$8.5 billion.

#### **Emergency Planning Community Right-to-Know Act**

The Emergency Planning Community Right-to-Know Act (EPCRA), also known as SARA Title III, was enacted in October 1986. This law requires any infrastructure at the state and local levels to plan for chemical emergencies. Reported information is then made publicly available so that interested parties may become informed about potentially dangerous chemicals in their community. EPCRA Sections 301 through 312 are administered by EPA's Office of Emergency Management. In California, SARA Title III is implemented through CalARP.

#### **Federal Aviation Administration Functions**

The FAA has primary responsibility for the safety of civil aviation. The FAA's major functions regarding hazards include the following: 1) developing and operating a common system of air traffic control and navigation for both civil and military aircraft; 2) developing and implementing programs to control aircraft noise and other environmental effects of civil aviation; 3) regulating U.S. commercial space transportation; and 4) conducting reviews to determine that the safety of persons and property on the ground are protected.

## **Federal Response Plan**

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that: 1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; 2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and 3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a Presidential declaration of a major disaster or emergency.

## **Hazardous Materials Transportation Act**

The USDOT regulates hazardous materials transportation under Title 49 of the Code of Federal Regulations (CFR). State agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the California Department of Transportation (Caltrans). These agencies also govern permitting for hazardous materials transportation. Title 49 CFR reflects laws passed by Congress as of January 2, 2006.

## **International Fire Code**

The International Fire Code (IFC), created by the International Code Council, 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 IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code (IBC) use a hazard classification system to determine what measures are required to protect fire and life safety. These measures may include construction standards, separation from property lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is updated every three years.

## **National Emissions Standards for Hazardous Air Pollutants Program**

Under federal law, 188 substances are listed as Hazardous Air Pollutants (HAPs). Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPS) program. The EPA is establishing regulatory schemes for specific source categories, and requires implementation of Maximum Achievable Control Technologies (MACTs) for major sources of HAPs in each source category. State law has established the framework for California's Toxic Air Contaminant Identification and Control Program, which is generally more stringent than the federal program, and is aimed at HAPs that are a problem in California. The state has formally identified more than 200 substances as Toxic Air Contaminants (TACs), and is adopting appropriate control measures for each. Once adopted at the state level, each district will be required to adopt a measure that is equally or more stringent.

## **Renovating, Repair and Painting Rule**

In 2008, EPA issued the Renovation, Repair and Painting Rule. This rule requires that firms performing renovation, repair, and painting projects that disturb lead-based paint in pre-1978 homes, child care facilities and schools be certified by EPA and that they use certified renovators who are trained by EPA-

approved training providers to follow lead-safe work practices. Individuals can become certified renovators by taking an eight-hour training course from an EPA-approved training provider. Contractors must use lead-safe work practices and follow these three simple procedures: 1) contain the work area; 2) minimize dust; and 3) clean up thoroughly.

### **Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984**

Federal hazardous waste laws are generally promulgated under the RCRA. These laws provide for the “cradle to grave” regulation of hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed. DTSC is responsible for implementing the RCRA program as well as California’s own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. Under the Certified Unified Program Agency (CUPA) program, California EPA has in turn delegated enforcement authority to the County DEH for regulating hazardous waste producers or generators.

### **Robert T. Stafford Disaster Relief and Emergency Assistance Act**

CFR Sections 206.31-206.48 provide the statutory framework for a Presidential declaration of an emergency or a declaration of a major disaster. Such declarations open the way for a wide range of federal resources to be made available to assist in dealing with an emergency or major disaster. The Stafford Act structure for the declaration process reflects the fact that federal resources under this act supplement state and local resources for disaster relief and recovery. Except in the case of an emergency involving a subject area that is exclusively or preeminently in the federal purview, the Governor of an affected state, or Acting Governor if the Governor is not available, must request such a declaration by the President.

### **U.S. Department of Defense Air Installations Compatible Use Zone Program**

Safety compatibility criteria for military air bases are set forth through the Air Installations Compatible Use Zone (AICUZ) Program administered by the DOD. This Program applies to military air installations located within the U.S., its territories, trusts, and possessions. The AICUZ Program has the following four purposes: 1) to set forth DOD policy on achieving compatible use of public and private lands in the vicinity of military airfields; 2) to define height and land use compatibility restrictions; 3) to define procedures by which AICUZ may be defined; and 4) to provide policy on the extent of Government interest in real property within these zones that may be retained or acquired to protect the operational capability of active military airfields.

## **4.8.2.2 State**

### **California Education Code**

The California Education Code (CEC) establishes the law for California public education. CEC requires that the DTSC be involved in the environmental review process for the proposed acquisition and/or construction of school properties that will use state funding. The CEC requires a Phase I Environmental Site Assessment (ESA) be completed prior to acquiring a school site or engaging in a construction

project. Depending on the outcome of the Phase 1 ESA, a Preliminary Environmental Assessment and remediation may be required. The CEC also requires potential, future school sites that are proposed within two miles of an airport to be reviewed by Caltrans DOA. If Caltrans does not support the proposed site, no state or local funds can be used to acquire the site or construct the school.

## **California Emergency Services Act**

This Act was adopted to establish the state's role and responsibilities during manmade or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the state. This Act is intended to protect health and safety by preserving the lives and property of the people of the state.

## **California Fire Code**

The California Fire Code (CFC) is provided in CCR Title 24, Chapter 9. It was created by the California Building Standards Commission and based on the International Fire Code created by the International Code Council. The CFC 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 requirements for 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 protect fire and life safety. These measures may include construction standards, separation from property lines, and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification. The CFC is updated every three years.

## **California Human Health Screening Levels**

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

## **California Natural Disaster Assistance Act**

The California Natural Disaster Assistance Act (NDAA) provides financial aid to local agencies to assist in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The NDAA is activated after local declaration of emergency, CalEMA gives concurrence with the local declaration, or the Governor issues a Proclamation of a state emergency. Once the NDAA is activated, local government is eligible for certain types of assistance, depending upon the specific declaration or proclamation issued.

## California State Aeronautics Act

The State Aeronautics Act is implemented by Caltrans DOA. The purpose of this Act is to: 1) foster and promote safety in aeronautics; 2) ensure state laws and regulations relating to aeronautics are consistent with federal aeronautics laws and regulations; 3) assure that persons residing in the vicinity of airports are protected against intrusions by unreasonable levels of aircraft noise; and 4) develop informational programs to increase the understanding of current air transportation issues. Caltrans DOA issues permits for and annually inspects hospital heliports and public-use airports, makes recommendations regarding proposed school sites within two miles of an airport runway, and authorizes helicopter landing sites at/near schools.

## California State Fire Plan

The 2010 California State Fire Plan is the first statewide fire plan developed in concert between the State Board of Forestry and Fire Protection and CalFire. The central goals of the State Fire Plan include: 1) improved availability and use of information on hazard and risk assessment; 2) land use planning, including general plans, new development and existing developments; 3) shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as community wildfire protection plans; 4) establishing fire resistance in assets at risk, such as homes and neighborhoods; 5) shared vision among multiple fire protection jurisdictions and agencies; 6) levels of fire suppression and related services; and 7) post fire recovery.

## Emergency Response to Hazardous Materials Incidents

California has developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local government, and private agencies. The Emergency Response Plan is administered by the California Emergency Management Agency (CalEMA) and includes response to hazardous materials incidents. CalEMA coordinates the response of other agencies, including the California EPA, California Highway Patrol, California Department of Fish and Game, the RWQCBs, San Diego Air Pollution Control District, City of San Diego Fire Department, and DEH-HIRT.

## EPA Region 9, Preliminary Remediation Goals

Region 9 is the Pacific Southwest Division of the EPA, which includes Arizona, California, Hawaii, Nevada, Pacific Islands, and over 140 Tribal Nations. Preliminary Remediation Goals (PRGs) are tools for evaluating and cleaning up contaminated sites. PRGs for the Superfund/RCRA programs are risk-based concentrations, derived from standardized equations combining exposure information assumptions with EPA toxicity data. They are considered to be protective for humans (including sensitive groups) over a lifetime. However, PRGs are not always applicable to a particular site and do not address non-human health issues such as ecological impacts. Region 9's PRGs are viewed as agency guidelines, not legally enforceable standards.

## Government Code Section 65962.5(a), Cortese List

The Hazardous Waste and Substance Sites Cortese List is a planning document used by the state, local agencies and developers to comply with the California Environmental Quality Act (CEQA) requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California EPA to develop at least annually an updated Cortese List. DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local

government agencies are required to provide additional hazardous materials release information for the Cortese List.

## **H&SC Hazardous Materials Release Response Plans and Inventory**

Two programs found in the H&SC Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substances release. These two programs are referred to as the HMBP program and the CalARP program. County DEH is responsible for the implementation of the HMBP program and the CalARP program in the San Diego region. The HMBP and CalARP programs provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, a HMBP or RMP is required pursuant to the regulation. Congress requires the EPA Region 9 to make RMP information available to the public through the EPA's Envirofacts Data Warehouse. Region 9 is the Pacific Southwest Division of the EPA, which includes Arizona, California, Hawaii, Nevada, Pacific Islands, and over 140 Tribal Nations. The Envirofacts Data Warehouse is considered the single point of access to select EPA environmental data.

## **H&SC Section 25270, Aboveground Petroleum Storage Act**

The Aboveground Petroleum Storage Act requires registration and spill prevention programs for ASTs that store petroleum. In some cases, ASTs for petroleum may be subject to groundwater monitoring programs that are implemented by the Regional Water Quality Control Boards (RWQCBs) and the SWRCB. County DEH is the local administering agency for this program within the proposed project area.

## **Senate Bill 1889, Accidental Release Prevention Law/California Accidental Release Prevention Program**

Senate Bill (SB) 1889 required California to implement a new federally-mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, the Accidental Release Prevention Law/CalARP replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. CalARP addresses facilities that contain specified hazardous materials, known as regulated substances, that if involved in an accidental release, could result in adverse offsite consequences. CalARP defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

## **State Fire Regulations**

State fire regulations are set forth in Sections 13000 et seq. of the California H&SC, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

## **Title 14 Division 1.5 of the CCR**

CCR Title 14 Division 1.5 establishes the regulations for CalFire and is applicable in all SRA areas where CalFire is responsible for wildfire protection. Development within SRA areas must comply with these

regulations. Among other things, Title 14 establishes minimum standards for emergency access, fuel modification, property line setbacks, signage, and water supply.

### **Title 22 of the CCR and Hazardous Waste Control Law, Chapter 6.5**

The DTSC regulates the generation, transportation, treatment, storage and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose “cradle to grave” regulatory systems for handling hazardous waste in a manner that protects human health and the environment. The California EPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other CUPAs, including the San Diego County DEH.

### **Title 23 of the CCR, Underground Storage Tank Act**

The UST Act monitoring and response program is required under Chapter 6.7 of the California H&SC and Title 23 of the CCR. The program was developed to ensure that the facilities meet regulatory requirements for design, monitoring, maintenance, and emergency response in operating or owning USTs. County DEH is the administering agency for this program within the proposed project area.

## **4.8.2.3 Regional/Local**

### **City of Escondido Municipal Code, Chapter 7**

Chapter 7, Sections 7-1 through 7-8, of the City’s Municipal Code provides for the preparation and carrying out of plans for the protection of persons and property within the City in the event of an emergency. It also discusses coordination of the emergency functions of the City with all other public agencies, corporations, organizations, and affected private persons. Chapter 7 of the Municipal Code requires the City of Escondido Disaster Council to be responsible for the development of the City’s Emergency Action Plan for City Employees, which provides for the effective mobilization of all the resources of the City, both public and private, to meet any condition constituting a local emergency, state of emergency, or state of war emergency, and to provide for the organization, powers and duties, services, and staff of the emergency organization.

### **City of Escondido Weed and Rubbish Abatement Program**

Division 2 of Article 2 of Chapter 11 of the City’s Municipal Code establishes the Weed and Rubbish Abatement Program. The purpose of this ordinance is to designate the responsibility of the owners of real property in the City in the elimination of the public nuisance created by weeds, rubbish and refuse on or around their property. This chapter of the Municipal Code declares the following as a public nuisance or fire hazard: all weeds growing upon the streets, sidewalks, parking, and private property in the City of Escondido; and all rubbish upon the streets, sidewalks, parking facilities, and private property in the City of Escondido. The Chief of the Escondido Fire Department, or any agent thereof, is vested with the authority to determine if vegetation on private property results in a fire hazard and must be removed.

### **County of San Diego Consolidated Fire Code**

The County of San Diego, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001. The Consolidated Fire Code contains amendments to the California Fire Code. The purpose of consolidation of the County and local fire districts adoptive ordinances is to

promote consistency in the interpretation and enforcement of the Fire Code for the protection of the public health and safety, which includes permit requirements for the installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the code. The Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management. Additionally, the fire code regulates hazardous materials and associated measures to ensure that public health and safety are protected from incidents relating to hazardous substance releases.

## **San Diego County, Site Assessment and Mitigation Program**

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

### **4.8.3 Analysis of Project Impacts and Determination of Significance**

#### **4.8.3.1 Issue 1: Transport, Use, and Disposal of Hazardous Materials**

##### **Guidelines for Determination of Significance**

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

A significant impact would occur if businesses, operations, or facilities allowed under the proposed project that handle hazardous substances, in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, would 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 would not be able to comply with applicable hazardous substance regulations.

##### **Impact Analysis**

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Impacts related to implementation of the City of Escondido Climate Action Plan (E-CAP) are discussed separately below.

##### **General Plan Update and Downtown Specific Plan Update**

Implementation of the proposed General Plan Update would result in land uses in the proposed project area that typically involve the use, storage, disposal and transportation of hazardous materials.

Chemicals that are considered hazardous materials are found everywhere. They purify drinking water, increase crop production, and simplify household chores. Hazards can occur during production, storage, transportation, use, or disposal. Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Many products containing hazardous chemicals are also used and stored in homes routinely. These products are also shipped daily on the nation's highways, railroads, waterways, and pipelines. Chemical manufacturers are one source of hazardous materials, but there are many others, including service stations, hospitals, and hazardous materials waste sites. Varying quantities of hazardous materials are manufactured, used, or stored at facilities within the proposed project area, from industrial plants to local dry cleaning establishments or gardening supply stores. Hazardous materials come in the form of explosives, corrosives, flammable and combustible substances, poisons, and radioactive materials (FEMA 2008).

Implementation of the proposed General Plan Update would result in increased development in the proposed project area, which would include land uses that involve the use, disposal or transport of hazardous materials. Although hazardous materials can be found in all land use designations, those that are more likely to regularly use hazardous materials include light industrial, general industrial, industrial office, neighborhood commercial, general commercial and planned commercial. The general industrial land use would be considered the proposed land use with the highest potential to transport, store and dispose of hazardous materials in quantities that could pose a significant risk to humans or the environment. When compared to existing conditions, the General Plan Update would substantially increase general industrial, light industrial and industrial office land uses within the following study areas: Imperial Oaks SPA Transit Station Target Area, South Quince Street Target Area, ERTC North SPA, ERTC South SPA, I-15/Felicita Road Corporate Office Target Area, and Downtown SPA. Light industrial, general industrial and industrial office land uses would allow businesses that handle large quantities of hazardous materials. In addition, these study areas would also experience increased neighborhood commercial, general commercial and planned commercial land uses, which also have the potential to handle and use hazardous materials, although at a lesser quantity than anticipated under industrial land uses. Therefore, new development occurring under the General Plan Update would result in an increase in land uses that use hazardous materials.

Additionally, the transportation of hazardous materials may rise as a direct result of increased hazardous materials usage within the proposed project area. Two registered active hazardous waste transporters service the City of Escondido which include Downstream Services, Inc., and Ingenium Group, LLC, both located in the ERTC North SPA (DTSC 2011a). There are no permitted TSD facilities within the proposed project area, or within the entire County of San Diego. Therefore, registered active hazardous waste transporters must transport hazardous waste generated in the proposed project area from its source to TSD facilities in adjacent counties (DTSC 2011b). The transportation of hazardous waste occurs mostly along major roadways in the proposed project area; however, because hazardous waste sources could occur anywhere in the proposed project area, any roadway could be used to transport hazardous waste. Therefore, it is likely that the transportation of hazardous wastes would cross through or pass by all land use types in the proposed project area, including residential and other sensitive land uses. An increase in hazardous materials usage and transport could result in adverse environmental effects. This would result in a potentially significant impact.

### **Escondido Climate Action Plan**

Implementation of the E-CAP would involve implementation of several greenhouse gas (GHG) reduction measures in order to aggressively reduce GHG emissions in the proposed project area. Examples of proposed E-CAP GHG reduction measures include, but are not limited to, new residential renewable

energy requirements (R2-E3), new commercial renewable energy requirements (R2-E4), existing residential energy retrofits (R2-E5), transit improvements (R2-T3), transportation demand management (R2-T4) and increased use of combined heat and power systems (R1-E6). Implementation of these E-CAP reduction measures could result in the use, transportation and disposal of hazardous materials. More specifically, reduction measures that require or encourage solar voltaic installation would involve the transportation, use and potential disposal of hazardous materials during solar panel production, transportation, installation and disposal. The most significant hazardous materials usage associated with solar voltaics is the use of hazardous chemicals in the manufacturing phase of the solar cell. However, improper disposal of solar panels at the end of their useful life also involves hazardous materials (MSW 2011). Therefore, because the E-CAP encourages the use of solar voltaic cells, implementation of the E-CAP would result in the use, disposal and transportation of hazardous materials. A potentially significant impact would occur.

### **Federal, State and Local Regulations and Existing Regulatory Processes**

Numerous federal, state and local regulations exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. Regulations that would be required of those transporting, using or disposing of hazardous materials include RCRA, which provides the 'cradle to grave' regulation of hazardous wastes; CERCLA, which regulates closed and abandoned hazardous waste sites; the Hazardous Materials Transportation Act, which governs hazardous materials transportation on U.S. roadways; IFC, which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials; CCR Title 22, which regulates the generation, transportation, treatment, storage and disposal of hazardous waste; CCR Title 27, which regulates the treatment, storage and disposal of solid wastes; and the County Consolidated Fire Code, which regulates hazardous materials and hazardous substance releases.

For development within California, Government Code Section 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of H&SC Division 20, Chapter 6.95, Article 2, Sections 25500 through 25520.

The County DEH is the CUPA for the proposed project area and is responsible for enforcing Chapter 6.95 of the H&SC. As the CUPA, the DEH is required to regulate HMBPs and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and RMPs. An HMBP is required to contain basic information on the location, type, quantity and health risks of hazardous materials stored, used, or disposed of on development sites. The HMBP also contains an emergency response plan which describes the procedures for mitigating a hazardous materials release, procedures and equipment for minimizing the potential damage of a hazardous release, and provisions for immediate notification of DEH, OES, and other emergency response personnel such as the local fire agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

### **Proposed General Plan Update Policies**

The proposed General Plan Update includes policies within the Community Protection Element that would reduce the exposure of people and the environment to hazards involved with the routine

transport, use or disposal of hazardous materials. Emergency Services Policy 1.3 requires periodic exercises to test and improve jurisdictional and inter-department coordination and response to hazardous material spills. Hazardous Materials Policies 8.1 and 8.2 require updates to Escondido's Household Waste Management Plan and the County's Hazardous Waste Management Plan, and coordination between agencies to ensure hazardous materials use, transportation and disposal are in compliance with existing laws. Hazardous Materials Policies 8.3, 8.4 and 8.5 require maintenance of regulations related to hazardous materials; encourage businesses and residents to minimize hazardous materials usage; and provide household hazardous waste collection options. Hazardous Materials Policies 8.6, 8.7 and 8.8 require cooperation with agencies to mitigate hazardous materials contamination in groundwater; maintain the fire department's program to respond to hazardous materials incidents; and require the City's participation in the HIRT. Hazardous Materials Policies 8.9 and 8.10 encourage public education about household hazardous wastes and require soil and groundwater contamination assessments for project sites with existing hazardous materials contamination. Hazardous Materials Policy 8.11 requires the development and implementation of land use controls for land uses that utilize hazardous materials.

Further, within the Land Use and Community Form Element, Environmental Review Policies 18.1 through 18.4 require project conformance with CEQA, the General Plan, facilities plans, and quality of life standards; mitigation of environmental impacts; and an update of environmental thresholds in sensitive areas.

#### **Proposed Downtown Specific Plan Update Policies**

The proposed Downtown Specific Plan Update does not contain policies related to hazardous materials transportation, use or disposal.

#### **Proposed Escondido Climate Action Plan Reduction Measures**

The proposed E-CAP does not contain reduction measures related to hazardous materials transportation, use or disposal.

### **Summary**

Implementation of the proposed General Plan Update, Downtown Specific Plan Update and E-CAP would involve an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses, as designated under the proposed General Plan Update, would be required to comply with applicable federal, state and local regulations related to hazardous materials. Required compliance with these regulations and implementation of the policies proposed within the General Plan Update would ensure the proposed project's impacts related to transport, use and disposal of hazardous materials would be less than significant.

## **4.8.3.2 Issue 2: Accidental Release of Hazardous Materials**

### **Guidelines for Determination of Significance**

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would create a significant hazard to the public or the

environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

## Impact Analysis

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Impacts related to implementation of the E-CAP are discussed separately below.

### General Plan Update and Downtown Specific Plan Update

As described above in Section 4.8.1, Existing Conditions, hazardous materials are regularly used and transported throughout the proposed project area. Although such activities involve strict regulations regarding monitoring and handling, accidental release of hazardous materials due to natural disasters, human error or misuse is possible. The designation of land uses such as light industrial, general industrial, industrial office, neighborhood commercial, general commercial and planned commercial would result in the development of facilities that typically involve the use and storage of hazardous materials. Additionally, because growth would be accommodated in the proposed project area, the demand for goods and services would also be expected to increase, such as industrial manufacturing or drycleaners, both of which involve the use of hazardous materials and have the potential for the accidental release of these materials. Therefore, the number of facilities that use and store hazardous materials, which may have the potential to result in a reasonably foreseeable upset or accident condition involving the release of hazardous materials into the environment, would increase under the proposed General Plan Update.

Implementation of the proposed General Plan Update would have the potential to result in adverse impacts to the public and environment from an unplanned accidental release of hazardous materials. Within the proposed project area, there are multiple sites that have potential hazardous waste contamination problems such as LUFTs. Additionally, the public or environment could also be exposed to hazardous materials through improper construction activities which involve material/object removal such as asbestos, lead or USTs; during construction on properties with existing contamination; during transportation from facilities within the proposed project area to TSD facilities outside the proposed project area; or in areas where established populations are located near facilities that use, store or dispose of hazardous materials. Therefore, impacts would be considered significant.

### Escondido Climate Action Plan

Implementation of E-CAP reduction measures could result in the accidental release of hazardous materials into the environment and/or exposure of the public to hazardous materials via reasonably foreseeable upset conditions. Specifically, reduction measures such as energy efficiency retrofits (R2-E5) for existing buildings could result in remodeling or retrofitting of existing structures, some of which could be a source of asbestos, lead-based paint and other hazardous materials. Additionally, the conversion of existing electrical facilities to more energy efficient facilities could increase exposure to electrical transformers containing polychlorinated biphenyls (PCBs) that have the potential to pose a health and safety risk via accidental release, misuse, or historic use. In addition, renovation activities associated with the installation of solar photovoltaic systems could result in the accidental release of hazardous materials if the solar voltaic cells are damaged during installation or disposed of improperly. Therefore, E-CAP impacts would be considered significant.

### **Federal, State and Local Regulations and Existing Regulatory Processes**

Numerous federal, state, and local regulations exist that reduce the potential for humans or the environment to be affected by an accidental release of hazardous materials. These include, but are not limited to, the following: 1) Chemical Accident Prevention Provisions, which require companies that use certain hazardous materials to develop an RMP; 2) RCRA, which requires infrastructure at the state and local levels to plan for chemical emergencies; 3) Robert T. Stafford Disaster Relief and Emergency Assistance Act, which provides the statutory framework for a Presidential declaration of an emergency or major disaster; 4) California H&SC, which provides threshold quantities for regulated hazardous substances and the establishment of Hazardous Materials Release Response Plans; 5) CCR Title 23, which ensures that facilities meet regulatory requirements for USTs; 6) Aboveground Petroleum Storage Act, which requires registration and spill prevention programs for ASTs; 7) CalARP, which governs the accidental airborne release of chemicals; 8) CalEMA Emergency Response Plan, which provides coordination between federal, state, and local governments and private agencies in the event of an emergency; and 9) California Emergency Services Act, which establishes the state's role during natural or man-made emergencies. The County DEH is also required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Future site-specific environmental review would ensure a reasonable level of safety for workers and users of future development through review and mitigation of site-specific health hazards associated with electrical transformers containing PCBs. In addition, certain GHG reduction measure activities, including potential demolition and remodeling, would be subject to federal, state and local regulations specifically aimed at preventing lead and asbestos-related hazards. For example, the EPA's Renovation, Repair and Remodeling Rule (40 CFR 745, Subpart E) requires contractors or firms performing renovation, repair, and painting projects that disturb lead-based paint in buildings built before 1978 to be certified and to follow specific work practices to prevent lead contamination. EPA has also developed asbestos demolition and renovation requirements in the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation (40 CFR, Part 61, Subpart M). NESHAP includes notification, inspection, and emission control requirements.

### **Proposed General Plan Update Policies**

The General Plan Update policies that apply to this issue are the same as those discussed above in Section 4.8.3.1, Issue 1: Transport, Use, and Disposal of Hazardous Materials.

### **Proposed Downtown Specific Plan Update Policies**

The proposed Downtown Specific Plan Update does not contain policies related to the accidental release of hazardous materials.

### **Proposed Escondido Climate Action Plan Reduction Measures**

The proposed E-CAP does not contain reduction measures related to the accidental release of hazardous materials.

## Summary

Implementation of the proposed General Plan Update and Downtown Specific Plan Update would result in an increase in land uses that commonly store, use, and dispose of hazardous materials, such as light industrial, general industrial, industrial office, neighborhood commercial, general commercial and planned commercial development. Additionally, existing industries and businesses that use hazardous materials may expand or increase to accommodate the projected growth under the General Plan Update. These land uses could result in an accidental release of hazardous materials. Further, implementation of the E-CAP could result in the accidental release of hazardous materials from retrofitting and installation of energy efficient facilities. However, all future development allowable under the proposed land use designations identified in the General Plan Update would be required to comply with applicable federal, state and local regulations related to the transportation, use, storage, and disposal of hazardous materials. Compliance with such regulations would minimize the potential for a release to occur and provide planning mechanisms for prompt and effective cleanup if an accidental release did occur. Therefore, required compliance with existing regulations would ensure the proposed project's impacts related to an accidental hazardous materials release would be less than significant.

### 4.8.3.3 Issue 3: Hazards to Schools

#### Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

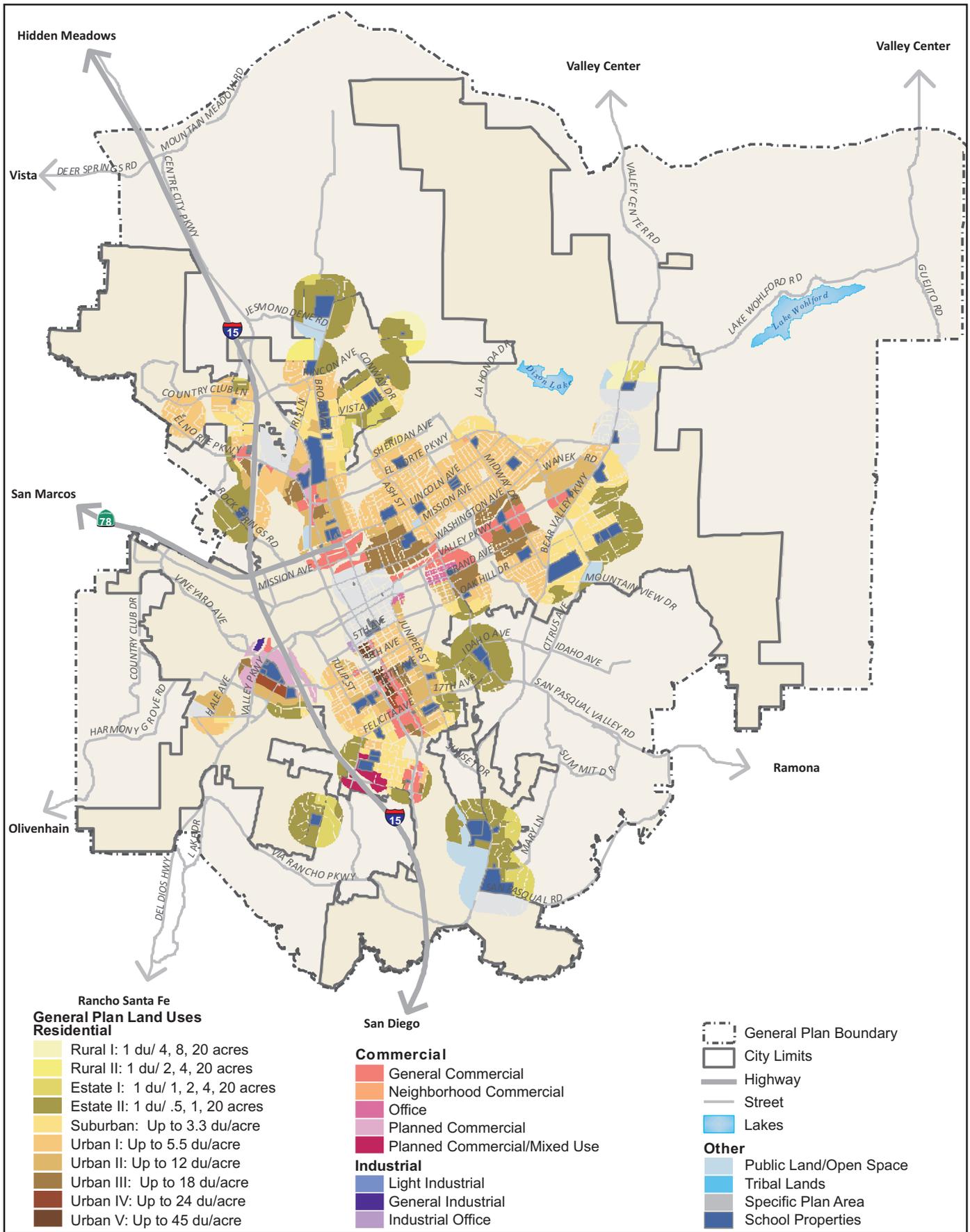
#### Impact Analysis

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Impacts related to implementation of the E-CAP are discussed separately below.

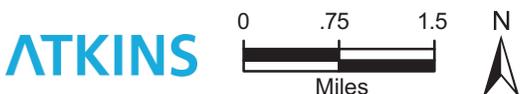
#### General Plan Update and Downtown Specific Plan Update

As discussed above, almost all land uses under the proposed General Plan Update have the potential to use, store, transport and dispose of hazardous materials. Even schools and day care operations may use and dispose of hazardous materials, such as cleaning products or laboratory chemicals, that potentially pose a risk to the public. Therefore, it is possible that implementation of the proposed General Plan Update would result in the use, storage, or transport of hazardous materials within one-quarter mile of a school.

Figure 4.8-5, Land Uses within One-quarter Mile of Schools, and Table 4.8-1, Proposed Land Uses within One-Quarter Mile of School Facilities, identify the location and types of proposed land uses that would occur within one-quarter mile from schools under implementation of the General Plan Update. Although hazardous materials can be found in all land uses, those that are more likely to regularly use high quantities of hazardous materials include light industrial, general industrial, industrial office, neighborhood commercial, general commercial and planned commercial. The general industrial land



Source: City of Escondido 2011



**LAND USES WITHIN 1/4 MILE OF SCHOOLS**  
**FIGURE 4.8-5**

use would be considered the proposed land use with the highest potential to transport, store and dispose of hazardous materials in significant quantities. As identified below in Table 4.8-1, Proposed Land Uses within One-Quarter Mile of School Facilities, approximately 576 acres of general industrial, light industrial, industrial office, neighborhood commercial, general commercial and planned commercial land uses would occur within one-quarter mile of schools under implementation of the General Plan Update. Daycares may occur under many different land use categories in the proposed project area, which could similarly be within one-quarter mile of a use that handles hazardous materials. Therefore, under the proposed General Plan Update, land uses that have a high potential for hazardous materials usage would potentially be located within one-quarter mile of schools or daycares.

**Table 4.8-1 Proposed Land Uses within One-Quarter Mile of School Facilities**

Land Use Designations <sup>(1)</sup>	Acres Within One-Quarter Mile of a School
General Commercial	394
Neighborhood Commercial	5
Planned Commercial	167
General Industrial	7
Industrial Office	3
Office	63
Specific Plan Area	622
Public Land/Open Space	261
Rural I	104
Rural II	64
Suburban	1,046
Estate I	273
Estate II	1,689
Urban I	1,716
Urban II	596
Urban III	406
Urban IV	35
Urban V	26

<sup>(1)</sup> Land use designations not listed have zero acreage located within ¼ mile of a school facility

Note: Data has been rounded to nearest whole number.

Source: City of Escondido 2011

The use, storage, or transportation of hazardous materials within one-quarter mile of a school or daycare could also increase under the proposed General Plan Update from the transportation of hazardous materials on roadways within the vicinity of schools. The expansion of existing commercial or industrial uses to accommodate population growth in the planning area may affect an existing or future school or day care, if it is located in the vicinity of a land use or development that currently uses, stores or disposes of hazardous materials. Therefore, impacts are considered significant.

### **Escondido Climate Action Plan**

As discussed above, implementation of the E-CAP has the potential to use, store, transport and dispose of hazardous materials, specifically through the use of photovoltaic solar panels. Although the E-CAP does not designate specific locations within the proposed project area that would use, store, transport or dispose of hazardous materials, it is reasonably foreseeable that the use of such materials would occur within one-quarter mile of a school or daycare. Therefore, impacts would be potentially significant.

### **Federal, State and Local Regulations and Existing Regulatory Processes**

Federal and state regulations exist that reduce hazardous emissions and hazardous materials handling within one-quarter mile of an existing or proposed school. These include, but are not limited to, CHHSLs, which evaluates sites with potential human health concerns, and the CEC, which requires the preparation of environmental assessments prior to school siting.

Additionally, Section 15186 of the CEQA Guidelines establishes requirements for school projects, as well as projects near schools, to ensure that potential health impacts resulting from exposure to hazardous materials, wastes, and substances are examined and disclosed in an environmental document. Section 15186 also states that the hazardous materials which must be considered a risk are those which may impose a health or safety hazard to persons who would attend or would be employed at the school. Specifically, when a project located within one-quarter mile of a school involves the construction or alteration of a facility that might emit hazardous or acutely hazardous air emissions or handle acutely hazardous materials or a mixture containing acutely hazardous materials in a quantity equal to or greater than that specified in Section 25536(a) of the H&SC, the lead agency must: 1) consult with the affected school district regarding the potential impact of the project when circulating the environmental document; and 2) notify the affected school district in writing prior to approval and certification of the environmental document.

The DEH is also required to regulate HMBPs and chemical inventory, hazardous waste and tiered permitting, USTs and RMPs within the proposed project area. If proposed development projects would handle regulated substances subject to CalARP requirements within one-quarter mile of an existing or proposed school, then the DEH requires completion of an offsite consequence analysis to determine whether, in the event of an accidental release, a potentially significant hazard could occur.

Further, when school districts propose new school projects, they must undergo similar reviews and regulatory processes prior to being sited near uses that would potentially handle or emit hazardous materials.

### **Proposed General Plan Update Policies**

The General Plan Update policies that apply to this issue are the same as those discussed above in Section 4.8.3.1, Issue 1: Transport, Use, and Disposal of Hazardous Materials. Specifically, Hazardous Materials Policy 8.11 addresses schools and hazardous materials and requires the development and implementation of strict land use controls, performance standards, and structure design standards for uses that generate, use, or store hazardous materials, including setbacks from sensitive uses (e.g., schools, residential homes, and daycare facilities) to protect the health and safety of the community in concert with regional, state and federal requirements for existing and proposed uses.

### **Proposed Downtown Specific Plan Update Policies**

The proposed Downtown Specific Plan Update does not contain policies related to the emission or handling of hazardous materials near schools.

### **Proposed Escondido Climate Action Plan Reduction Measures**

The proposed E-CAP does not contain reduction measures related to the emission or handling of hazardous materials near schools.

## **Summary**

The General Plan Update and Downtown Specific Plan Update propose land uses that have a high potential for hazardous materials usage to be located within one-quarter mile of an existing or proposed school or daycare facility. Additionally, the E-CAP identifies GHG reduction measures that have the potential for hazardous materials to be used within one-quarter mile of an existing or proposed school or daycare facility. However, compliance with federal and state regulations pertaining to hazardous wastes, including the CEQA Guidelines specified above, would ensure that the proposed project's risk associated with hazardous emissions and schools would remain below a level of significance.

## **4.8.3.4 Issue 4: Existing Hazardous Materials Sites**

### **Guidelines for Determination of Significance**

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it proposed a land use involving human habitation or occupation on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List) and, as a result, would create a significant hazard to the public or the environment.

### **Impact Analysis**

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update.

#### **General Plan Update and Downtown Specific Plan Update**

Typical adverse effects related to existing contamination from hazardous substances relate to the potential for site conditions or site contamination to result in adverse human or environmental effects. Potential pathways of exposure to contaminants from existing contamination includes direct ingestion of contaminated soils and/or groundwater, inhalation of volatiles and fugitive dusts, ingestion of contaminated groundwater caused by migration of chemicals through soil to an underlying potable aquifer, dermal absorption, ingestion of homegrown produce that has been contaminated via plant uptake, and migration of volatiles into basements and slabs. Potential exposure to contaminants could also occur to construction workers during site development and to the residents or workers that occupy the ultimate land use approved on the site.

Some land uses designated under the proposed General Plan Update would be more likely to disturb existing hazardous material sites and increase potential pathways of exposure than others. For

example, residential designations would have the potential to introduce human populations into areas that could have a history of contamination from LUFTs, historic agricultural use, or other existing hazards. Construction activities could uncover buried USTs or other buried hazards. Areas designated for open space recreation or open space conservation, which generally do not allow land uses that involve excavation, grading, or the permanent construction of dwelling units, would be unlikely to disturb existing hazardous material sites, and would not result in hazardous materials exposure to the public.

As discussed above in Section 4.8.1, Existing Conditions, the proposed project area contains sites listed on regulatory databases, as well as sites formerly or presently used for agriculture and petroleum storage. A summary of the potential impacts associated with each of these potential sources of hazardous materials is provided below.

### ***Sites Listed Pursuant to Government Code Section 65962.5***

Implementation of the proposed General Plan Update would likely result in future development on or within one-quarter mile from a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.5. As shown above in Figure 4.8-1, Existing Hazardous Material Sites, the City's downtown area has a concentration of existing hazardous materials sites. Under implementation of the proposed General Plan Update, intensified commercial and industrial land uses would be allowed in this area. The DTSC EnviroStor database has one site listed in the proposed project area. The GeoTracker database identifies over 260 sites within the proposed project area, the list of active CDO and CAO from the SWRCB contains approximately two sites, and the SWIS database identifies seven sites within the proposed project area. Due to the large number of hazardous materials sites located throughout the proposed project area, implementation of the General Plan Update would have the potential to result in a potentially significant hazard to the public or environment by locating projects on or near sites listed pursuant to Government Code Section 65962.5.

### ***Historic Agriculture***

Implementation of the proposed General Plan Update could result in land uses and development on or near areas that have elevated pesticide levels due to past or present agricultural operations. Agriculture, historically and currently, is a strong component to the local economy. Figure 4.2-5, Agricultural Resources, in Section 4.2, Agricultural Resources, identifies the numerous agricultural operations that exist throughout the proposed project area, some of which may have elevated levels of agricultural pesticides. Implementation of the proposed General Plan Update would allow the development of new land uses on sites previously used for agricultural operations, which could expose humans to soils or groundwater previously contaminated with agricultural pesticides.

### ***Petroleum Contamination***

Implementation of the proposed General Plan Update could result in land uses and development in areas with elevated concentrations of petroleum in the soil, on the surface or in groundwater. Accidents, spills, leaks, and past improper disposal of petroleum products have resulted in multiple sites across the proposed project area that contain contaminated land, groundwater and surface water. For example, the GeoTracker database, which identifies LUFT sites, has over 70 LUFT sites listed in the proposed project area. These contaminated sites have the potential to threaten human health as well as the environment by contaminating soil, groundwater and drinking water supplies. Implementation of the General Plan Update would allow development to occur on areas that have been exposed to petroleum contamination, thereby potentially creating a hazard to the public or the environment.

### **Escondido Climate Action Plan**

The E-CAP would not result in the development of any land use that involves human habitation or occupation. For this reason, the E-CAP is concluded to have no impact related to existing hazardous materials sites.

### **Federal, State and Local Regulations and Existing Regulatory Processes**

Federal and state regulations exist that prevent or reduce hazards to the public and environment from existing hazardous materials sites. These include, but are not limited to, the following: 1) CERCLA, which regulates closed and abandoned hazardous waste sites; 2) PRGs, which establishes tools for evaluating and cleaning up contaminated sites; 3) Cortese List, which provides information about the location of hazardous materials release sites; and 4) CHHSLs, which evaluates sites with potential human health concerns.

### **Proposed General Plan Update Policies**

The General Plan Update policies that apply to this issue are the same as those discussed above in Section 4.8.3.1, Issue 1: Transport, Use, and Disposal of Hazardous Materials.

### **Proposed Downtown Specific Plan Update Policies**

The proposed Downtown Specific Plan Update does not contain policies related to existing hazardous materials contamination.

### **Proposed Escondido Climate Action Plan Reduction Measures**

The proposed E-CAP does not contain reduction measures related to existing hazardous materials contamination.

## **Summary**

Under implementation of the General Plan Update and Downtown Specific Plan Update, land uses and development may be located on a site such as those pursuant to Government Code Section 65962.5, areas with historic or current agricultural operations or areas with petroleum contamination. However, compliance with applicable existing regulations and processes and implementation of the proposed General Plan Update policies would ensure that the General Plan Update and Downtown Specific Plan Update would not result in a significant hazard to the public or the environment from the location of future land uses for human habitation or occupation on existing hazardous materials sites. The E-CAP does not propose development of any land use that involves human habitation or occupation and was concluded to have no impact. Therefore, the proposed project would have a less than significant impact associated with existing hazardous materials sites.

## **4.8.3.5 Issue 5: Public Airports**

### **Guidelines for Determination of Significance**

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would locate development within the McClellan-Palomar Airport or the Ramona Airport ALUCP or, where such a plan has not been adopted, within two miles of a

public airport or public use airport, and would result in a safety hazard for people residing or working in the area.

## Impact Analysis

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Impacts related to implementation of the E-CAP are discussed separately below.

### General Plan Update and Downtown Specific Plan Update

Implementation of the proposed General Plan Update would accommodate increased population within the proposed project area, thereby increasing the demand for airport travel and operations. An increase in airport travel would increase the potential for safety risks associated with airports to occur. Airport hazards involve uncertain events that may occur with occasional aircraft operations. This is quite different than predictable events (such as noise) that occur with every aircraft operation. On the ground, aircraft hazards are generally produced by aircraft mishaps, either incidents or accidents, which are associated with the operation of an aircraft. Ground-related incidents or accidents generally occur during take-off or landing. The most common type of take-off or landing accident is a runway incursion. A runway incursion is defined as an occurrence along the airport runway that creates a collision hazard or prevents an aircraft from taking off or landing. It can involve an aircraft, vehicle, person, or any other object that impacts an aircraft's ability to land or take-off. Hazards in the air jeopardize the safety of an airborne aircraft and expose passengers, pilots, and crews to danger. Examples of hazards that interfere with air safety include tall structures, birds, glare-producing objects, or radio waves from communication centers. Essentially, there are two types of aviation-related safety concerns that affect land use near airports. The first is minimizing the severity of an aircraft accident by limiting the number of people and amount of property within airport hazard zones. The second is minimizing hazards in the air through restrictions on building heights and on uses that produce electronic or visual impairments to navigation or attract large numbers of birds.

There are no public airports within the proposed project area or within two miles of the proposed project area. The closest public airports to the proposed project area are approximately 10 miles away. The Ramona Airport, located approximately 10 miles east of the proposed project area. Some southern portions of the proposed project area are located within the Ramona AIA Review Area 2, which defines the airport's airspace protection and/or overflight notification areas. The General Plan Update proposes low density residential land uses (Estate I, Estate II, Rural I, and Rural II) or public land/open space within the AIA for the Ramona Airport. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2.

The McClellan-Palomar Airport is located approximately 10 miles to the west of the proposed project area. Portions of the proposed project area, west of I-15, are within the McClellan-Palomar Airport's AIA Review Area 2, which has the same height restrictions as identified above for the Ramona AIA Review Area 2; however, the General Plan Update area is located entirely outside of the airport's overflight notification area. The General Plan Update proposes low density residential land uses (Estate I, Estate II, Rural I, and Rural II) or public land/open space within the AIA for the McClellan-Palomar Airport.

Some land uses designated under the proposed General Plan Update would be more likely to result in public airport safety hazards than others. For example, areas designated for high density residential and commercial uses would be likely to contain relatively higher concentrations of persons than open space recreation, open space conservation, Rural I, Rural II, Estate I or Estate II land use designations. In general, the proposed General Plan Update would propose low density residential land uses (Estate I, Estate II, Rural I, Rural II) or public land/open space within the AIA areas for Ramona and McClellan-Palomar Airport. These land uses have low concentrations of persons which would reduce the risk of safety hazards for people residing or working in the area. Therefore, a significant impact would not occur.

### **Escondido Climate Action Plan**

Implementation of the E-CAP would not result in the construction of facilities or structures that would impair public airport operations or pose a safety hazard to the public. For example, the E-CAP does not require or encourage the construction of new wind turbines for alternative energy usage, which would have the potential to impair airport operations. E-CAP reduction measures R2-E3 and R2-E4 require the provision of support facilities to connect new residential or commercial development with offsite wind generation, but no E-CAP policy specifically encourages or requires the construction of new wind facilities, such as wind turbines, within the proposed project area. Therefore, implementation of the E-CAP would not result in a safety hazard related to public airports and no impact would occur.

### **Federal, State and Local Regulations and Existing Regulatory Processes**

Federal and state regulations exist that prevent hazards to the public and environment near public airports. These include FAA regulations, which establish safety standards for civil aviation, and the State Aeronautics Act, which establishes air safety standards.

### **Proposed General Plan Update Policies**

The General Plan Update includes policies within the Mobility and Infrastructure Element that would reduce safety hazards associated with public airports. Aviation Policies 11.1 and 11.2 require monitoring of private and public airport-related activities in the vicinity of the City to ensure compatibility with proposed General Plan Update land uses and policies, and require all development located within the AIA for McClellan-Palomar Airport to be located and constructed in conformance with the ALUCP. Aviation Policies 11.3 and 11.4 require review of expansion plans for San Diego International and McClellan-Palomar Airports to ensure their range of aviation services meets the present and future needs of residents and the business community, and collaboration with Palomar Pomerado Healthcare District regarding emergency medical helicopter services.

### **Proposed Downtown Specific Plan Update Policies**

The proposed Downtown Specific Plan Update does not contain policies related to public airports.

### **Proposed Escondido Climate Action Plan Reduction Measures**

The proposed E-CAP does not contain reduction measures related to public airports.

## **Summary**

In general, the proposed General Plan Update would propose low density residential land uses (Estate I, Estate II, Rural I, Rural II) or public land/open space within the AIA areas for Ramona and McClellan-Palomar Airport. These land uses generally have low concentrations of persons which would reduce the

risk of safety hazards for people residing or working in the area. A significant impact would not occur. Further, implementation of the E-CAP would not impose measures that conflict with aircraft operations within the vicinity of a public airport.

### 4.8.3.6 Issue 6: Private Airports

#### Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would locate development within the vicinity of a private airstrip and would result in a safety hazard for people residing or working in the area.

#### Impact Analysis

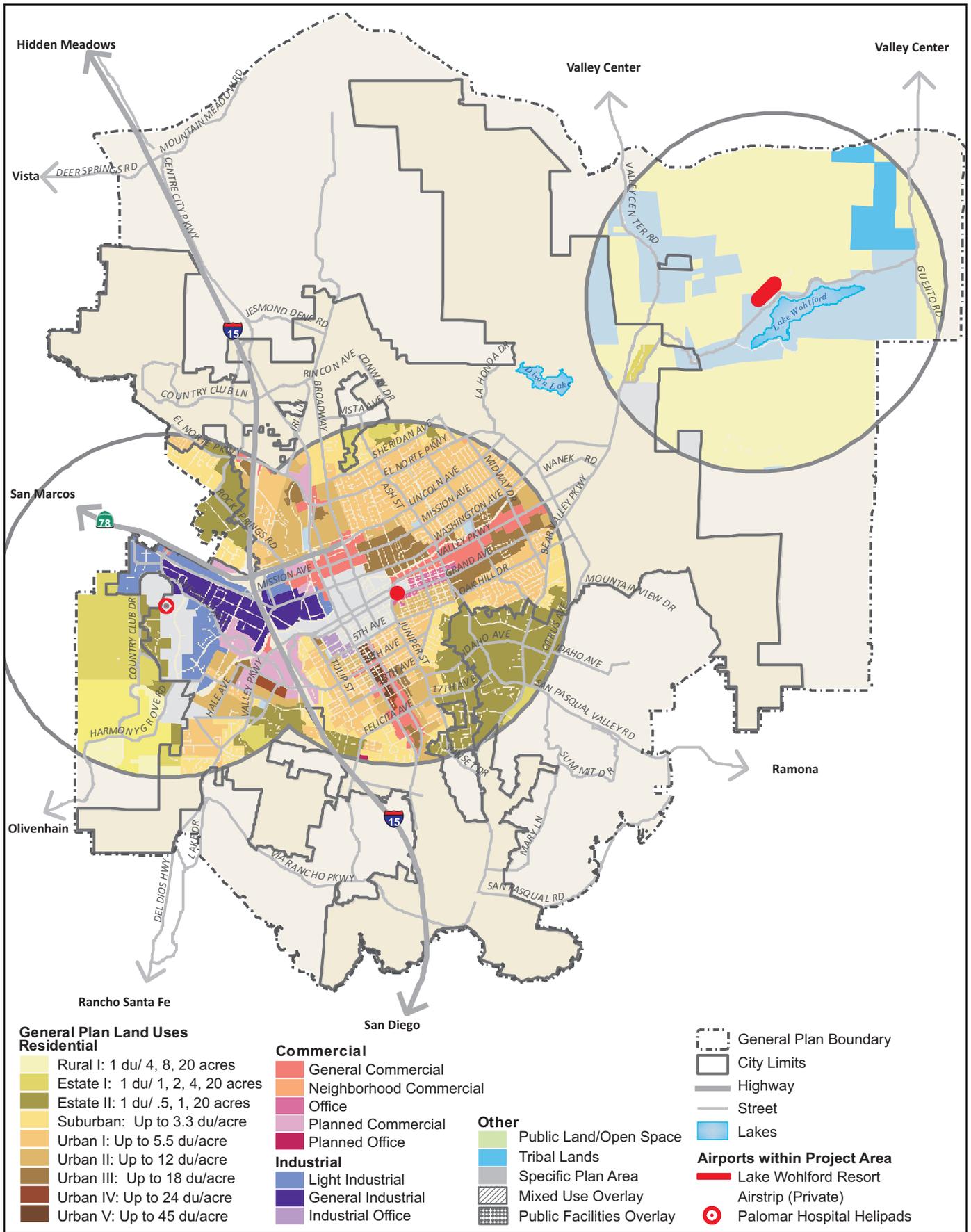
Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Impacts related to implementation of the E-CAP are discussed separately below.

##### General Plan Update and Downtown Specific Plan Update

The only private airstrip located within the proposed project area is the Lake Wohlford Airstrip, located northwest of Lake Wohlford in the northeast portion of the planning area. The Lake Wohlford Airstrip is depicted below in Figure 4.8-6, Proposed Land Uses Near Airports. Some land uses designated under the proposed General Plan Update would be more likely to result in private airport safety hazards than others. For example, areas for high density residential and commercial uses would be likely to contain relatively higher concentrations of persons than open space recreation, open space conservation, Rural I, Rural II, Estate I and Estate II land use designations. If land uses containing high concentrations of persons are located in areas adjacent to private airport operations, private airport hazards would be considered potentially significant. As shown in Figure 4.8-6, Proposed Land Uses Near Airports, the General Plan Update proposes public land, Residential I and tribal land use designations within two miles of the Lake Wohlford Resort Airstrip. These land uses have low concentrations of persons which would reduce the risk of safety hazards for people residing or working in the area. Therefore, a significant impact would not occur.

As shown in Figure 4.8-6, Proposed Land Uses Near Airports, there is heliport is located at Palomar Medical Center which allows patients to be flown in or out of the hospital by helicopter. A second helipad is currently proposed, as shown in this figure, as part of the Palomar Medical Center West project within the ERTC North SPA. The operation of helipads are regulated by federal, state and local laws which are intended to reduce risks of accidents associated with helicopters. In order to receive approvals from the FAA and Caltrans DOA, the existing and proposed helicopter flight paths are required to comply with standard obstruction-clearance criteria to ensure an obstruction-free volume of airspace for pilots using the facility. Compliance with all regulations would ensure that land uses proposed under the proposed project and within the vicinity of these helipads would not pose a risk to public health and safety from helicopter accidents and, therefore, impacts would be less than significant.

Blackington Airport is located north of the proposed project area, within Valley Center and outside of the proposed project area. Implementation of the General Plan Update would not place land use designations within two miles of this private airport. Therefore, the proposed General Plan Update would not impact Blackington Airport operations.



Source: City of Escondido 2011



**LAND USES NEAR AIRPORTS**  
**FIGURE 4.8-6**

There are no military airports in the proposed project area. The closest military airports to the proposed project area include MCAS Camp Pendleton, located to the northwest of the proposed project area, and MCAS Miramar, located to the southwest of the proposed project area. Both of these airports are located approximately 12 miles from the proposed project area. Therefore, development proposed under the General Plan Update would not impact military airports.

### **Escondido Climate Action Plan**

Implementation of the E-CAP would not result in the construction of facilities or structures that would impair private airport operations or pose a safety hazard to the public. Specifically, the E-CAP does not require or encourage the construction of new wind turbines for alternative energy usage, which would have the potential to impair airport operations. E-CAP reduction measures R2-E3 and R2-E4 require the provision of support facilities to connect new residential or commercial development with offsite wind generation, but no E-CAP policies encourage or require the construction of new wind facilities, such as wind turbines, within the proposed project boundary. Therefore, implementation of the E-CAP would not result in a safety hazard related to private airports and no impact would occur.

### **Federal, State and Local Regulations and Existing Regulatory Processes**

Federal and state regulations exist that help to prevent hazards to the public and the environment from land uses within two miles of private airstrips. These include, but are not limited to, the following: 1) FAA regulations, which establish safety standards for civil aviation; 2) DOD AICUZ, which establish safety compatibility criteria for military air bases; and 3) the State Aeronautics Act, which establishes air safety standards.

### **Proposed General Plan Update Policies**

The General Plan Update policies that apply to this issue are the same as those discussed above in Section 4.8.3.5, Issue 5: Public Airports.

### **Proposed Downtown Specific Plan Update Policies**

The proposed Downtown Specific Plan Update does not contain policies related to private airports.

### **Proposed Escondido Climate Action Plan Reduction Measures**

The proposed E-CAP does not contain reduction measures related to private airports.

## **Summary**

Implementation of the proposed General Plan Update may result in land use designations that allow development within two miles of a private airport. However, the land uses proposed within the vicinity of a private airport, specifically Lake Wohlford Resort Airstrip, are low density in nature and would preclude high concentrations of persons located in areas adjacent to private airport operations. Further, implementation of the E-CAP would not impact private airport operations. Therefore, the proposed project would not result in safety hazards for people residing or working in the vicinity of a private airport and impacts would be less than significant.

### 4.8.3.7 Issue 7: Emergency Response and Evacuation Plans

#### Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, such as the San Diego County Multi-Jurisdictional Hazard Mitigation Plan, the Emergency Action Plan for City of Escondido Employees, and the Escondido Community Emergency Response Team Program. The proposed project would also result in a significant impact if it would impair or physically interfere with the operation of Mobility Element roadways as public evacuation routes in the event of an emergency.

#### Impact Analysis

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Impacts related to implementation of the E-CAP are discussed separately below.

##### General Plan Update and Downtown Specific Plan Update

Interference with an adopted emergency response or evacuation plan would result in an adverse physical effect to people or the environment by potentially increasing the loss of life and property in the event of a disaster. Development that proposes large concentrations of people or special needs individuals, such as stadiums or hospitals, in an area with increased hazards, such as flooding, could cause adverse effects related to the implementation of the Multi-Jurisdictional Hazard Mitigation Plan or a Dam Evacuation Plan (additional information on dam inundation and flooding is provided in Section 4.9, Hydrology and Water Quality). Failure to provide reasonable access for emergency equipment and evacuation of civilians could also result in a major loss of life, property, and natural resources. Additionally, certain tall structures can physically interfere with the implementation of an emergency response if the height of the structure or tower interferes with the ability of emergency air support services to carry out missions associated with an emergency response. Under implementation of the proposed General Plan Update, all proposed Mobility Element roadways could be used as public evacuation routes in the event of an emergency. Figure 4.8-4, Emergency Evacuation Routes, above identifies emergency evacuation routes within the proposed project area.

Implementation of the proposed General Plan Update does not propose to change the plans or policies of the Multi-Jurisdictional Hazard Mitigation Plan, Dam Evacuation Plan, City's Emergency Action Plan for City Employees or the City's CERT Program or any other emergency plan, although it is possible that land uses and development implemented under the General Plan Update may require the updating of these emergency plans. Construction activities associated with development occurring under the General Plan Update would have the potential to interfere with emergency plans and procedures if authorities are not properly notified, or multiple projects are constructed during the same time and multiple roadways used for emergency routes are concurrently blocked. However, as projects are developed as allowed under the General Plan Update, most individual projects would be required to undergo site-specific, project-level CEQA review, which requires an evaluation of potential impacts

related to emergency response and evacuation plans. Compliance with CEQA would prevent multiple roadways used for emergency routes from being concurrently blocked.

Additionally, the General Plan Update proposes intensified land use development in many of the 15 study areas within the planning area boundary. There is a potential that the existing emergency response and evacuation plans that serve the proposed project area in the event of an emergency do not account for the intensification of land uses. This could cause an inadvertent impairment to existing emergency response plans and policies, which could increase risks to loss of life and property in the event of an emergency. As part of the proposed project, the Escondido Fire Department (EFD) and Escondido Police Department (EPD) were contacted to evaluate the proposed project's impact on their services and facilities. Copies of correspondence with these agencies are provided in Appendix F, Public Services Correspondence. As stated by both EFD and EPD, the proposed General Plan Update would not interfere with the implementation of adopted emergency response or emergency evacuation plans due to the fact that these plans are continually updated to keep pace with growth and change in the area. Management provisions within the plans are continually updated in order to ensure coordination with the pace and rate of new development.

Emergency response and emergency evacuation plans for fire and police protection services in the proposed project area are continually evaluated to accommodate changes in population growth, increases in dwelling units, traffic, visitors to the community, supporting infrastructure and related services. Additionally, changes in location, densities and types of businesses are considered within emergency response and emergency evacuation plan re-evaluating standards. As determined by the EFD and EPD, implementation of the General Plan Update would not result in a significant impact to the implementation of emergency response and evacuation plans.

#### **Escondido Climate Action Plan**

The E-CAP contains a variety of reduction measures that would reduce vehicle miles traveled (VMT) and associated congestion on roadways within the proposed project area, including: land use based trips and VMT reduction policies (R2-T1), bicycle master plan (R2-T2), transit Improvements (R2-T3), and transportation demand management (R2-T4). A reduction in vehicle congestion on roadways within the proposed project area would result in increased emergency response and evacuation access in the event of an emergency. Therefore, the E-CAP would not impair emergency response or evacuation plans and no impact would occur.

#### **Federal, State and Local Regulations and Existing Regulatory Processes**

The San Diego County Multi-Jurisdictional Hazard Mitigation Plan, the Emergency Action Plan for City of Escondido Employees, and the Escondido Community Emergency Response Team Program outline emergency response and evacuation procedures for the proposed project area.

#### **Proposed General Plan Update Policies**

The proposed General Plan Update includes Emergency Services Policy 1.8, which requires regular review and revision of identified evacuation routes and reduces the potential for proposed land uses and development to interfere with adopted emergency response or evacuation plans. Within the Land Use and Community Form Element, Environmental Review Policies 18.1 through 18.4 require project conformance with CEQA, the General Plan, facilities plans, and quality of life standards; mitigation of environmental impacts; and an update of environmental thresholds in sensitive areas.

### **Proposed Downtown Specific Plan Update Policies**

Within the proposed Downtown Specific Plan Update, Design Standard 11 requires the City Engineering/Public Works and Fire Departments to review and approve appropriate clearances around and between buildings to ensure adequate sight distance, safety, and maintenance clearances for private, service, and emergency vehicles.

### **Proposed Escondido Climate Action Plan Reduction Measures**

The E-CAP contains a variety of reduction measures that would reduce VMT and associated congestion on roadways within the proposed project area. Reduction measure R1-T7, Goods Movement and Efficiency Measures, would promote systemwide efficiency improvements in goods movement. Reduction measure R2-T1, Land Use Based Trips and VMT Reduction Policies, identifies land use strategies, consistent with the proposed General Plan Update, which would reduce VMT within the proposed project area. Reduction measure R2-T3, Transit Improvements, encourages coordination to improve public transit facilities and reduce VMT. Reduction measure R2-T4, Transportation Demand Management, encourages ride-sharing, carpooling and alternative modes of transportation to reduce automobile travel.

## **Summary**

Compliance with existing regulations and continual updating of emergency response and evacuation plans would prevent implementation of the General Plan Update and Downtown Specific Plan Update from impairing emergency response and evacuation plans. Further, the E-CAP does not propose measures that would impair emergency response or evacuation plans. Therefore, the proposed project would not result in a potentially significant impact associated with emergency response and evacuation plans.

### **4.8.3.8 Issue 8: Wildland Fires**

#### **Guidelines for Determination of Significance**

Based on Appendix G of the CEQA Guidelines and existing City policies and regulations, the proposed project would result in a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In the context of fire ecology, wildlands include undeveloped lands that support natural habitats such as grasslands, sage scrub, chaparral, and some coniferous trees.

#### **Impact Analysis**

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update; therefore, the following analysis pertains to both the General Plan Update and the Downtown Specific Plan Update. Impacts related to implementation of the E-CAP are discussed separately below.

#### **General Plan Update and Downtown Specific Plan Update**

Generally, two types of adverse effects are associated with wildland fires which include the immediate effects that occur during a wildland fire event and the effects that occur in the aftermath. In addition to

the potential loss of life and property, wildfires may result in the loss or permanent change of natural resources. Although wildfires are considered a natural process necessary to the functioning of many ecosystems, a wildfire's aftermath typically leaves land scorched and exposed. Until the land rehabilitates, the exposed soils may contribute to adverse environmental impacts including air and water pollution and unstable soils conditions such as mudslides and erosion. The end result of uncontrolled wildfire also includes debris from burned homes, some of which can be highly toxic, and can adversely impact the environment by polluting local waterways such as streams and rivers. Although natural conditions make wildfires common in the proposed project area, locating high density land uses adjacent to or within a WUI can result in increased fire-related risk to people and structures.

Figure 4.8-2, Wildfire Risk, above identifies FHSZs within the proposed project area. As shown in this figure, the vast majority of the proposed project area is located within a FHSZ of Very High or High. Areas within the City's downtown core are designated with a Moderate FHSZ. Table 4.8-2, General Plan Update Proposed Land Uses within High and Very High Fire Hazard Areas, identifies the proposed acreage of land uses that would occur in High or Very High FHSZs under the General Plan Update. As shown in this table, implementation of the General Plan Update would allow for 26,260 acres of residential (Estate I, Estate II, Rural I, Rural II, Suburban, Urban I, Urban II, Urban III), 324 acres of commercial and 12 acres of industrial development within High or Very High FHSZ, which could expose persons or structures to significant risk of loss, injury or death resulting from wildfires.

**Table 4.8-2 General Plan Update Proposed Land Uses within High and Very High Fire Hazard Areas**

Land Use	Acres
Estate I	4,156
Estate II	5,399
Rural I	10,870
Rural II	3,144
Suburban	1,517
Urban I	919
Urban II	229
Urban III	26
<b>Total Residential Land Uses</b>	<b>26,260</b>
General Commercial	99
Neighborhood Commercial	2
Planned Commercial	154
Planned Office	69
<b>Total Commercial Land Uses</b>	<b>324</b>
Light Industrial	12
<b>Total Industrial Land Uses</b>	<b>12</b>
Tribal Lands	445
Public Land/Open Space	6,112
Specific Plan Area	4,830
<b>Total Land Uses in High or Very High FHSZ</b>	<b>37,983</b>

Source: City of Escondido 2011

In addition to being located within areas that are at high risk of wildland fires, economic and environmental barriers exist within the proposed project area that may prevent adequate response to wildland fire events. For example, in the event of a major wildland fire event, adequate fire response staff may not be available within the proposed project area or surrounding jurisdictions, requiring the need to recruit fire fighters from across or outside the state. To compound the issue, funding for adequate fire protection services and personnel is often inadequate. Additionally, response times for a wildland fire event may be inadequate due to insufficient access. Fire response and access is further discussed in Section 4.14, Public Services. Infrastructure constraints, such as an insufficient supply of water to fight large wildland fires, may also contribute to an increased risk of wildland fire hazards. This issue is further discussed in Section 4.17, Utilities and Service Systems.

### **Federal, State and Local Regulations and Existing Regulatory Processes**

Federal and state regulations exist that reduce hazards to the public and environment from wildland fires, such as the NDAA, which provides assistance in the event of an emergency. Additionally, EFD is in the process of completing a Community Wildfire Protection Plan (CWPP), in compliance with the 2010 State Fire Plan. The CWPP will include a review of the current wildfire situation and provide numerous recommendations to improve the safety and defensible space in WUI areas. Within the Draft CWPP, EFD has identified annual vegetation and other flammable materials abatement priorities to be accomplished within WUI communities, as shown below in Table 4.8-3, Escondido Fire Department Vegetation and Other Flammable Materials Abatement Priorities.

### **Escondido Climate Action Plan**

The measures proposed in the E-CAP would not result in the development of any land uses that would expose people or structures to significant hazards involving wildland fires. For this reason, the E-CAP would have no impact related to wildland fires.

### **Proposed General Plan Update Policies**

The proposed General Plan Update includes several policies within the Community Protection Element that would reduce the exposure of people and the environment to wildland fire risks. Fire Protection Policies 2.14 and 2.15 require fire resistant landscaping, fire resistant site design and removal of excess vegetation. Fire Protection Policies 12.6 and 12.7 require fire protection plans within High and Very High FHSZs and wildfire suppression programs that minimize impacts to biological resources. Fire Protection Policy 2.18 requires public education outreach to minimize wildland fire hazards. Within the Land Use and Community Form Element, Environmental Review Policies 18.1 through 18.4 require project conformance with CEQA, the General Plan, facilities plans, and quality of life standards; mitigation of environmental impacts; and an update of environmental thresholds in sensitive areas.

### **Proposed Downtown Specific Plan Update Policies**

The proposed Downtown Specific Plan Update does not contain policies related to wildfire hazards.

### **Proposed Escondido Climate Action Plan Reduction Measures**

The proposed E-CAP does not contain reduction measures related to wildfire hazards.

**Table 4.8-3 Escondido Fire Department Vegetation and Other Flammable Materials Abatement Priorities**

Fuels Treatment Project Name	Size	Priority Level	Commencement Year
Centre City Parkway Linked Defensible Space	14 acres	A	2011
I-15 Highway Mowing	30 acres	A	2011
Via Rancho Parkway Evacuation Route	26 acres	A	2011
Escondido Creek Thinning Project	5 acres	A	2011
Lake Wohlford Road Evacuation Route	20 acres	A	2012
Lomas Serenas Linked Defensible Space	60 acres	A	2012
Via Loma Vista Linked Defensible Space	20 acres	A	2012
Purer Road Linked Defensible Space	40 acres	A	2013
Quail Glen Linked Defensible Space	3 acres	A	2013
View Crest Glen Fuelbreak	15 acres	A	2013
Sonata Linked Defensible Space	100 acres	A	2014
Sonata Homeowner's Association Interior Fuels Treatment	15 acres	A	2014
Avenida del Diablo Fuelbreak	22 acres	A	2015
Hidden Trails Linked Defensible Space	17 acres	A	2015
Kauana Loa Fuelbreak	15 acres	A	2015
Quail Glen Coastal Sage Protection	17 acres	A	2015
Barbara Drive Evacuation Route	9 acres	B	2016
High Point Fuelbreak	6 acres	C	2016
Hubbard Hill Evacuation Route	7 acres	B	2016
La Honda Linked Defensible Space	11 acres	B	2016
Las Palmas Evacuation Route	8 acres	B	2016
Woodland Heights Glen Road Treatment	66 acres	B	2016
<b>Estimated Total Area:</b>	<b>526 acres</b>		

Source: EFD 2011

## Summary

Implementation of the proposed General Plan Update and Downtown Specific Plan Update would result in land uses that allow residential, commercial and industrial development in areas that are prone to wildland fires. This is due to the fact that the majority of proposed project area is located in High or Very High FHSZs. Implementation of the General Plan Update and Downtown Specific Plan Update would result in a potentially significant impact from the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands. However, compliance with existing regulations and implementation of the proposed General Plan Update policies would reduce impacts to a level below significant. Implementation of the E-CAP would not expose people or structures to significant hazards involving wildland fires.

## 4.8.4 Cumulative Impacts

Typically, the geographic scope of cumulative impact analysis for hazardous materials includes the area immediately surrounding the affected hazardous materials location. However, the proposed project includes a large geographic area. Therefore, for the purposes of this analysis, the geographic scope of cumulative impact analysis includes the proposed project area and areas immediately surrounding the proposed project area.

### Issue 1: Transport, Use, and Disposal of Hazardous Materials

Cumulative projects within the region are likely to result in new development which would include facilities that involve the use, storage, disposal or transport hazardous materials, and potentially increase hazards to the public or the environment. For example, the general plans of surrounding jurisdictions would contain industrial land use designations which would allow businesses to handle large quantities of hazardous materials, thereby increasing the use, storage and disposal of hazardous materials. Additionally, the transportation of hazardous materials would increase in the region as a result of an expanded and improved highway system, as proposed in the SANDAG 2050 Regional Transportation Plan. However, similar to the proposed project, cumulative projects would be required to comply with regulations applicable to the use, disposal and transportation of hazardous materials, including the RCRA, CERCLA, Hazardous Materials Transportation Act, IFC, and CCRs Title 22 and Title 27. Therefore, any potential significant impacts would be reduced to below a level of significance through compliance with applicable regulations and cumulative projects would not result in a significant cumulative impact. Therefore, implementation of the proposed project would not contribute to a cumulative impact.

### Issue 2: Accidental Release of Hazardous Materials

The implementation of various cumulative projects, , such as those allowed under the general plans of adjacent jurisdictions, would increase the likelihood of hazards to the public or the environment through the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Generally, as the population increases, services and industries, such as dry cleaners and industrial manufacturing, which commonly store, use and dispose of hazardous materials, would increase to service the expanding population. As the services and industries that use hazardous materials increase, the risk of accidental release associated with these services and industries would also increase. Cumulative projects would be subject to regulations regarding the handling of hazardous materials, such as the Chemical Accident Prevention Provisions, RCRA, Robert T. Stafford Disaster Relief and Emergency Assistance Act, California H&SC, CCR Title 23, Aboveground Petroleum Storage Act, CalARP, CalEMA Emergency Response Plan, and the California Emergency Services Act. These regulations would reduce the risks associated with an accidental release of hazardous materials from cumulative projects and a potentially significant cumulative impact would not occur. Therefore, implementation of the proposed project would not result in a cumulatively considerable contribution to hazardous materials releases.

### Issue 3: Hazards to Schools

Cumulative projects in the region, such as those allowed under the general plans of adjacent jurisdictions, would increase infrastructure and services in the area to accommodate regional population growth. As population increases in the region, public services, such as schools, and industries and

services that use hazardous materials, such as manufacturing and dry cleaners, would concurrently increase. Proposed schools could potentially be located in the vicinity of facilities that emit hazardous emissions or handle hazardous or acutely hazardous materials, while existing schools could be affected by new or expanded facilities that use hazardous waste. However, cumulative projects would be subject to CEQA/NEPA review and CEC requirements. These requirements, such as mandated hazard investigations for potential school sites and analysis of proposed projects, would reduce the risk of cumulative projects to emit hazardous materials within one-quarter mile of schools. Therefore, a significant cumulative impact would not occur, and as such, the proposed project would not contribute to a significant cumulative impact.

#### **Issue 4: Existing Hazardous Materials Site**

It is reasonable to assume that surrounding jurisdictions contain multiple existing hazardous materials sites, pursuant to Government Code Section 65962.5, similar to proposed project area. Therefore, implementation of cumulative projects, such as those allowed under the general plans of adjacent jurisdictions, would have the potential to locate new development on a site with existing hazardous materials issues, which would result in a potentially significant impact to the public or environment. However, most cumulative projects would be required to undergo CEQA/NEPA review, in addition to abiding by applicable regulations that prevent risks associated with existing hazardous materials sites, such as CERCLA, PRGs, Cortese List, and CHHSLs. Therefore, cumulative projects would not result in a significant cumulative impact associated with existing hazardous materials sites. As such, the proposed project would not contribute to a significant cumulative impact.

#### **Issue 5: Public Airports**

Cumulative projects, such as those allowed under the general plans of adjacent jurisdictions, would potentially result in incompatible land uses within the vicinity of a public airport. This could result in a potentially significant safety hazard for people residing or working in these project areas. However, cumulative projects would be subject to safety regulations, such as ALUCPs, FAA standards and the State Aeronautics Act, which would reduce the potential for safety hazards to below a level of significance. Therefore, cumulative projects would not result in a potentially significant cumulative impact. As such, the proposed project would not contribute to a significant cumulative impact associated with incompatible land uses within the vicinity of a public airport.

#### **Issue 6: Private Airports**

Cumulative projects, such as those allowed under the general plans of adjacent jurisdictions, would potentially result in incompatible land uses within the vicinity of a private airport. This could potentially result in a significant safety hazard for people residing or working in these project areas. However, cumulative projects would be subject to safety regulations, such as FAA standards, DOD standards and the State Aeronautics Act, which would reduce the potential for safety hazards to below a level of significance. Therefore, cumulative projects would not result in a potentially significant cumulative impact. As such, the proposed project would not contribute to a significant cumulative impact associated with incompatible land uses within the vicinity of a private airport.

#### **Issue 7: Emergency Response and Evacuation Plans**

Cumulative projects, such as those allowed under the general plans of adjacent jurisdictions, would have the potential to impair existing emergency and evacuation plans. This could occur from any of the

following: 1) an increase in population that is induced from cumulative projects which are unaccounted for in emergency plans; 2) an increase in population that emergency response teams are unable to service adequately in the event of a disaster; or 3) evacuation route impairment if multiple development projects concurrently block multiple evacuation or access roads. However, cumulative projects would be required to comply with applicable emergency response and evacuation policies outlined in regulations such as the Federal Response Plan, the California Emergency Services Act, local fire codes, and regional/jurisdictional emergency response and evacuation plans. Due to existing regulations, cumulative projects would not result in a significant cumulative impact associated with the implementation of emergency response and evacuation plans. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a significant cumulative impact.

## **Issue 8: Wildland Fires**

Southern California has a history of experiencing frequent and intensive wildland fires, which have exposed people and structures to a significant loss of life and property. Some cumulative projects would occur in areas that are considered High or Very High FHSZs. Growth occurring in the northern San Diego County region, implemented under various cumulative projects, would likely place people and/or property within danger of wildland fires due to the widespread risk across the region. Although regulations exist to reduce hazards associated with wildland fires, they would not reduce the risk to below a level of significance. Therefore, the cumulative impact associated with wildland fires would be significant.

Implementation of the proposed General Plan Update would result in land uses that allow residential, commercial and industrial development in areas that are prone to wildland fires. Implementation of the General Plan Update would result in a potentially significant impact from the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands. Compliance with existing regulations and implementation of the proposed General Plan Update policies would reduce impacts to a level below significant. Further, implementation of the E-CAP would not result in a significant impact from wildland fires. Therefore, the proposed project's contribution to this significant cumulative impact would not be cumulatively considerable.

### **4.8.5 Significance of Impact Prior to Mitigation**

Prior to mitigation, the proposed project would result in less than significant impacts associated with potential increases in hazards to the public and environment from the transportation, use and disposal of hazardous materials; accidental release of hazardous materials; existing hazardous materials sites; public airports; private airports; emergency response; and wildland fire hazards. The proposed project would not result in any significant cumulative impacts to the above-mentioned issues.

### **4.8.6 Mitigation**

#### **Issue 1: Transport, Use, and Disposal of Hazardous Materials**

Impacts related to the transportation, use and disposal of hazardous materials are less than significant given the existing regulations, policies, plans and guidelines discussed above. Therefore, mitigation is not necessary.

## **Issue 2: Accidental Release of Hazardous Materials**

Impacts related to the accidental release of hazardous materials are less than significant given the existing regulations, policies, plans and guidelines discussed above. Therefore, mitigation is not necessary.

## **Issue 3: Hazards to Schools**

Impacts related to hazardous materials and schools are less than significant given the existing regulations, policies, plans and guidelines discussed above. Therefore, mitigation is not necessary.

## **Issue 4: Existing Hazardous Materials Sites**

Impacts related to existing hazardous materials sites are less than significant given the existing regulations, policies, plans and guidelines discussed above. Therefore, mitigation is not necessary.

## **Issue 5: Public Airports**

Impacts related to public airports are less than significant given the existing regulations, policies, plans and guidelines discussed above. Therefore, mitigation is not necessary.

## **Issue 6: Private Airports**

Impacts related to private airports are less than significant given the existing regulations, policies, plans and guidelines discussed above. Therefore, mitigation is not necessary.

## **Issue 7: Emergency Response and Evacuation Plans**

Impacts related to implementation of emergency response and evacuation plans are less than significant given the existing regulations, policies, plans and guidelines discussed above. Therefore, mitigation is not necessary.

## **Issue 8: Wildland Fires**

Impacts related to wildland fires are less than significant given the existing regulations, policies, plans and guidelines discussed above. Therefore, mitigation is not necessary.

## **4.8.7 Conclusion**

The discussion below provides a synopsis of the conclusion reached in each of the above impact analyses.

## **Issue 1: Transport, Use, and Disposal of Hazardous Materials**

Implementation of the proposed project would result in an increase in the transportation, use and disposal of hazardous materials from an increase in solar voltaic usage and an increase in land uses that commonly store, use, and dispose of hazardous materials, such as industrial and commercial development. However, the project would be required to comply with federal, state and local regulatory requirements, including the RCRA, CERCLA, Hazardous Materials Transportation Act, CFC, CCR Title 22, and CCR Title 27, which strictly regulate the transportation, use and disposal of hazardous

materials. Additionally, the proposed General Plan Update includes multiple policies related to the responsible transportation, use and disposal of hazardous materials. Therefore, required compliance with existing regulations would reduce direct and indirect project impacts to less than significant. Additionally, the project would not contribute to a significant cumulative impact.

## **Issue 2: Accidental Release of Hazardous Materials**

Implementation of the proposed project would result in land uses, such as industrial and commercial uses, that commonly store, use, and dispose of hazardous materials. Additionally, industries and businesses using hazardous materials would expand or increase to accommodate the projected population growth under the General Plan Update. Further, the E-CAP would encourage the use of solar voltaic facilities, which have the potential to release hazardous materials in the event of an accident. However, all future development allowable under the General Plan Update would be required to comply with applicable federal, state and local regulations related to the accidental release of hazardous materials. Compliance with such regulations would minimize the potential for a release to occur and provide planning mechanisms for prompt and effective cleanup if an accidental release did occur. These regulations include, but are not limited to, the Chemical Accident Prevention Provisions, RCRA, Robert T. Stafford Disaster Relief and Emergency Assistance Act, California H&SC, CCR Title 23, Aboveground Petroleum Storage Act, CalARP, CalEMA Emergency Response Plan, and California Emergency Services Act. Therefore, required compliance with existing regulations would reduce direct and indirect project impacts related to an accidental hazardous materials release to below a level of significance. Additionally, the proposed project would not contribute to a significant cumulative impact.

## **Issue 3: Hazards to Schools**

The proposed project would result in land uses that have a high potential for hazardous materials to be located within one-quarter mile of an existing or proposed school or daycare facility. However, compliance with General Plan Update policies and federal and state regulations pertaining to hazardous wastes, including the CEQA Guidelines, would ensure that direct and indirect impacts associated with hazardous materials within one-quarter mile of an existing or proposed school or daycare facility would be below a level of significance. Additionally, the proposed project would not contribute to a significant cumulative impact.

## **Issue 4: Existing Hazardous Materials Sites**

Under implementation of the proposed project, land uses and development would be located on a site that would create potentially significant hazards to the public or environment, such as those pursuant to Government Code 65962.5, areas with historic or current agriculture, or areas with petroleum contamination. However, future development of land uses proposed under the General Plan Update would be required to comply with applicable General Plan Update policies and existing federal, state, and local regulations related to existing onsite hazardous materials contamination. Therefore, required compliance with existing regulations would reduce direct and indirect project impacts to less than significant. Additionally, the proposed project would not contribute to a significant cumulative impact.

## **Issue 5: Public Airports**

In general, the proposed General Plan Update would propose low density residential land uses (Estate I, Estate II, Rural I, Rural II) or public land/open space within the AIA areas for Ramona and McClellan-Palomar Airport. These land uses generally have low concentrations of persons which would reduce the

risk of accidents associated with airport operations. Further, implementation of the E-CAP would not impact public airports. Therefore, significant direct and indirect impacts would not occur. The project would not contribute to a significant cumulative impact.

### **Issue 6: Private Airports**

Implementation of the proposed General Plan Update would result in land use designations that allow development within the two miles of a private airport. However, these land uses are generally low density residential or open space and would therefore not result in a safety hazards for people residing or working in the project area. Implementation of the E-CAP would not impact private airports. Therefore, significant direct and indirect impacts would not occur. The proposed project would not contribute to a significant cumulative impact.

### **Issue 7: Emergency Response and Evacuation Plans**

Implementation of the General Plan Update would increase land use densities and intensities in areas that have not yet been accounted for in existing emergency response and evacuation plans. However, existing emergency response and evacuation plans are required to be updated regularly, and therefore, the proposed project would not directly or indirectly impair the implementation of emergency response and evacuation plans. Additionally, the project would not contribute to a significant cumulative impact.

### **Issue 8: Wildland Fires**

Implementation of the proposed General Plan Update would result in land uses that allow residential, commercial and industrial development in areas that are prone to wildland fires. This is due to the fact that the majority of the proposed project area is located in a High or Very High FHSZ. Implementation of the General Plan Update would have the potential to expose people or structures to a potentially significant risk of loss, injury, or death involving wildland fires. However, implementation of proposed General Plan Update policies, in addition to compliance with applicable regulations, would reduce direct and indirect project impacts related to wildland fires to a level below significant. Implementation of the E-CAP would not result in a significant impact related to wildland fires. Due to existing regulations and proposed General Plan Update policies, the proposed project would not result in a cumulatively considerable contribution to a significant cumulative impact associated with wildland fires.

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