3.1.4 Hazards, Hazardous Materials and Wildland Fire

This section presents a summary of the Phase I Environmental Site Assessment (2008a) and the Limited Soil Assessment conducted by Geocon Consultants in July 2008 (2008b) and is included as Appendices H and I, as well as the Fire Protection Plan prepared by FIREWISE 2000 (January 2010) and is included as Appendix J. The Fire Protection Plan follows the *County of San Diego Guidelines for Determining Significance and the Report Format Requirements for Wildland Fire and Fire Protection* (2008).

3.1.4.1 Existing Conditions

The project area consists of two adjoining parcels, totaling approximately 92.8 acres, of which approximately 90.9 acres consist of active agricultural production. The crop produced in the past five years on the project site is certified organic, meaning the citrus on-site is grown without the use of conventional pesticides, artificial fertilizers, human waste, or sewage sludge. Five wells are located on the project site and are currently used to irrigate the agricultural operations in combination with potable water received from the Rainbow Municipal Water District (RMWD).

Hazardous Materials

Hazardous materials include solids, liquids, or gaseous materials that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, could pose a threat to human health or the environment. Hazards include the risks associated with potential explosions, fires, or release of hazardous substances in the event of an accident or natural disaster, which may cause or contribute to an increase in mortality or serious illness, or pose substantial harm to human health or the environment.

On-Site Use of Hazardous Materials

Geocon completed a Phase I Environmental Site Assessment on July 8, 2008. The purpose of this Environmental Site Assessment was to evaluate the presence or likely presence of any hazardous substances or petroleum products on the site. This Environmental Site Assessment included an examination of the project site and adjacent properties for evidence of hazardous or toxic waste, an examination of State Water Resources Control Board (SWRCB) records pertaining to groundwater quality and conditions both on and surrounding the project site, a historical record search of both the site and surrounding areas, interviews and an examination of regulatory agency records to evaluate the presence of hazardous or toxic waste on the project site or surrounding properties. The Environmental Site Assessment did not identify any hazardous or toxic waste on the property, but did recommend limited soil testing of the site to evaluate potential pesticides associated with past agricultural practices.

Geocon subsequently completed soil sampling and analytical testing of the project site for pesticides. Eight soil samples were taken at various locations on the project site which were collected at both 0.5 and 2.5 feet below surface grade in each of the four sampling locations. No organophosphorus pesticides were identified in any of the soil samples at or greater than the analytical detection limits in the samples analyzed. Geocon therefore concluded that the levels of residual pesticides in the on-site soil did not present a risk to human health and no further assessment of the project site was warranted.

Off-Site Hazardous Materials

Based upon the database search conducted by Geocon, three sites were identified, all of which are off the project site. These were:

- Gaylord Grable property, located ¼ mile northwest of the project site. This site was identified in 1983 as possibly being contaminated with lead and acid solution with metals contaminated site. Site screening was performed in 1987. No further action status was approved by San Diego County Department of Health Services (DHS) in 1991 and confirmed by Calsites in 1994.
- Doug Dodson property, located ¼ mile southwest of the project site, identified as having a regular unleaded fuel tank installed in 1977.
- Vincent Joyce property located one mile to the west of the project site, is identified as having one unleaded fuel tank installed in 1977.

Applicable Plans and Regulations

Hazardous materials management is subject to numerous laws and regulations at all level of government. Additionally, drinking water standards for hazardous materials are mandated by both federal and state agencies. The following policies and regulations apply to the proposed project.

Federal Policies and Regulations

The United States Environmental Protection Agency (USEPA) regulates the management of hazardous materials and wastes. The primary federal hazardous materials and waste laws are contained in the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the Toxic Substances Control Act (TSCA). These laws apply to hazardous waste management, soil and groundwater contamination, and the controlled use of particular chemicals.

State Policies and Regulations

In California, the USEPA has delegated most of its regulatory responsibilities to the State. The TSCA allows the USEPA to ban or phase out the use of chemicals that may present unreasonable risks to public health or the environment.

The state agencies most involved in enforcing public health and safety laws and regulations include the Cal-EPA Department of Toxic Substance Control (DTSC), the California Occupational Safety and Health Agency (Cal-OSHA), the San Diego Regional Water Quality Control Board (RWQCB), and the California Integrated Waste Management Board (CIWMB).

DTSC enforces hazardous materials and waste regulations in California under the authority of the USEPA. California's Hazardous Waste Control Law incorporates the federal hazardous materials and waste standards of RCRA, but California's regulations are stricter in many respects.

In California, Cal-OSHA assumes primary responsibility for enforcing worker safety regulations such as the federal Hazard Communication Program regulations. Cal-OSHA regulations are found in CCR Title 8. Although Cal-OSHA regulations have incorporated federal OSHA standards, Cal-OSHA regulations are generally more stringent than those of the federal government.

Wildland Fire

The Fire Protection Plan, Appendix J, evaluates the risks and effects of wildfire on both the project site and adjacent areas. Within the Fire Protection Plan, adverse effects of wildfire are discussed as are the potential fire benefits of developing the site. The project site is located in an agricultural portion of Bonsall, and is dominated with orchards. The topography is uneven with low-relief rolling hills and wide valleys with elevations varying between 680 feet and 885 feet AMSL. This type of terrain is susceptible to wildfires, which San Diego County has experienced in the previous years.

Fire Protection Services

Structural fire protection and emergency services within the Bonsall area are provided by three independent Fire Protection Districts: the North County Fire Protection Districts, the Vista Fire Protection Districts, and the Deer Springs Fire Protection District (DSPFD). Each of these agencies has both mutual and automatic aid agreements with the others. The majority of calls for service in Bonsall are for medical emergencies, although approximately 20 percent calls are for fire incidents. The project site is served by the DSFPD.

Suppression of wildland fires in this area is the responsibility of the California Department of Forestry and Fire Protection (CALFIRE). CALFIRE is also a party to the Master Mutual Aid Agreement. CALFIRE provides basic life support emergency medical care required of first responders.

The nearest fire station to the project site is CALFIRE FS #15 at 9127 West Lilac Road, located 2.6 miles from the project site. This station is fully staffed 24 hours a day, seven days a week and is equipped with one Type 3 engine. The station currently has a four to six minute travel time to the project site, which is well below the acceptable 10 minute emergency travel time for estate lots, contained in the County's Public Facilities Element (p. x11-11-12).

On-Site Fire Conditions

For fire planning purposes, the project site consists of two distinct areas: (1) the development area consisting of approximately 34.3 acres to accommodate the roads, driveways, building pads, and leach fields; and (2) the remaining 58.5 acres of irrigated agricultural uses on-site. Two existing nurseries are located along a small portion of the northern boundary and a large portion of the eastern project boundary. Several existing roadways abut the project including Via Ararat Drive to the west, Mount Ararat Way to the south and Aqueduct Road along the eastern boundary. The project site would not be characterized as being in the Urban/Wildland Interface, since the project site and surroundings areas are primarily maintained as agricultural orchards and crops.

Data from the United States Geological Survey (USGS) Fire Planning and Mapping Tools was used to determine the fire history of wildland fire in the vicinity of the project site. No wildland fires have burned the site in the past three decades. All public utilities will be installed below ground as an added fire protection measure. The project includes two separate access routes from a wildland fire via Aqueduct Road and Via Ararat Drive, which both connect to West Lilac Road, a County-maintained road.

Applicable Plans and Regulations

County Fire Code

For the purposes of prescribing regulations in the unincorporated area of the County of San Diego, the applicable fire code is known as the County Fire Code and includes the Consolidated Fire Code and adopts by reference the California Fire Code, 2001 edition (CCR T-24 Part 9). The Consolidated Fire Code consists of local fire protection district ordinances that have modified the Fire Code portion of the State Building Standards Code and any County modification to the Fire Districts' amendments. The purpose of the code is for the protection of the public health and safety which includes permit and inspection requirements for the installation, alteration or repair of new and existing fire protection systems, and penalties for violations of the Fire Code. The Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems and vegetation management.

Other Hazards

The Initial Study completed for the project determined the project would not create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or waste since the project does not propose the storage, use, transport, emission, or disposal of hazardous substances, nor are hazardous substances proposed or currently in use on the project site or the immediate vicinity. The Initial Study also determined that the project would:

- Not create a hazard related to the release of asbestos, lead based paint or other hazardous materials from demolition activities, since the project does not propose to demolish any existing structures on-site;
- Not 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, since the project proposes the retention of existing agricultural uses and residential uses and the project will not contain, handle, or store any potential sources of chemicals or compounds that would present any significant risk of accidental exposure or the release of hazardous substances;
- Not emit hazardous emissions or handle hazardous or acutely hazardous materials and therefore would create no impact on the existing school located one-quarter mile from the project site and the project will not result in any potential safety hazard for people residing or working in the project area due to proximity to an airport, since no public airports are located within two miles of the project site and the project does not propose construction of any structure equal to or greater than 150 feet in height constituting a potential safety hazard to aircraft and/or operations from an airport or heliport; or
- Not create any safety hazard for people residing or working in the project area due to proximity to a private airstrip, since the proposed project is not within one mile of any private airstrip.

Since the Initial Study determined that the project would have no impact in any of these areas, they are not further analyzed in this EIR. Please see Section 2.1 of the EIR for an analysis of traffic and safety hazards related to roadway design.

3.1.4.2 Analysis of Project Effects and Determination as to Significance

Guidelines for the Determination of Significance

Hazardous Materials

Based on the State *CEQA Guidelines* Appendix G, the project would result in a significant hazard impact if it would:

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

Based on *the County of San Diego Guidelines for Determining Significance for Wildland Fire and Fire Protection* (December 19, 2008), the project would result in a significant impact related to wildland fire if it would:

2. Not be able to demonstrate compliance, or offer Same Practical Effect, with applicable fire regulations, including but not limited to the California Fire Code, California Code of Regulations, County Fire Code, or the County Consolidated Fire Code. "Same Practical Effect" means an exception or alternative with the capability of applying accepted wildland fire suppression strategies and tactics, and provisions for fire fighter safety, including access for emergency wildland fire equipment.

3. A comprehensive Fire Protection Plan has been required and the project is inconsistent with its recommendations including fuel modification.

4. The project cannot meet the emergency response objectives identified in the Public Facilities Element of the County General Plan or offer Same Practical Effect.

Analysis (Guideline 1 – Hazardous Materials)

A Phase I Environmental Site Assessment of the project site was completed by Geocon in July 2008 to assess the potential presence of hazardous substances or petroleum products on the project site. This Phase I Environmental Site Assessment included an on-site recognizance, an evaluation of SWRCB records pertaining to groundwater quality and contaminants on the project site and the surrounding area and a historical search of hazardous waste databases for both the project site and surrounding areas. This Phase I Environmental Site Assessment did not identify any hazardous substances or petroleum products on the project site.

Past Agricultural Activity

A soil assessment was performed by Geocon in July 2008 to evaluate the potential presence of pesticides in soil resulting from agricultural use of the project site. The objective of the soil assessment was to collect representative soil samples from selected areas of the project site and to perform laboratory analysis of soil samples for pesticides.

Soil samples were collected from four locations at 0.5 and 2.5 feet below surface grade in each location. The first sampling location was selected to assess the potential use of this location as a pesticide mixing

or storage area. The second sampling location was selected to assess potential presence of residual pesticides from use on plowing crops of the site and for downstream accumulation from stormwater runoff. The third sampling location was selected to be downstream in the drainage canal to assess potential accumulation of pesticides from stormwater runoff. The fourth sampling location was chosen to assess the potential presence of pesticides in the avocados and citrus groves that exist on the majority of the site. The soil sampling locations and depths were approved by DEH. Analytical testing was performed for organochlorine pesticides including: dichlorobishlorophenylethane (DDD), dichlorodiphenyldichloroethylene (DDE), diclorodiphenyltrichloroethane (DDT), alpha-chlordane, gama-chlordane, chlordane, dieldrin, and heptachlor expoxide.

EPA Region IX Preliminary Remediation Goals (PRGs) were used as a screening-level tool to evaluate the potential need for further evaluation of sites with concentrations of known cancer and non-cancer causing substances. Concentrations of the organochlorine pesticides, DDE, DDT, chlordane, dieldrin, and heptachlor epoxide were detected in the four samples at concentrations substantially less than the applicable regulatory thresholds. No organophosphorus pesticides were identified at or greater than the analytical detection limits in the samples analyzed. The pesticide concentrations did not meet or exceed the PRGs for organochlorine pesticides in residential soil. Following completion of this study, Geocon determined the levels of residual pesticides on site are too low the site does not present a risk to human health and that no further assessment of the site was warranted (Geocon, July 2008).

Off-Site Conditions

The Phase I Environmental Site Assessment completed by Geocon in July 2008 included a search of Federal, State and local databases for both the project site and surrounding areas. This database search identified three surrounding properties on governmental records as follows: (1) the Gaylord Goble property, located one-quarter of a mile northwest of the project site; (2) the Doug Dodson property located one-quarter mile southwest of the project site; and (3) the Vincent D. Joyce site, located within one mile of the project site to the west.

The data search indicated that the Gaylord Goble property located one-quarter mile northwest of the project site had one unleaded fuel tank installed in 1977. The database search indicated that this underground storage tank has not leaked. Since there is no evidence that this underground storage tank has leaked at any time and because it is a good distance away from the project site, no hazardous waste exposure impact from this underground storage tank is identified for the project.

The Doug Dodson property located one-quarter of a mile southwest of the project site was identified as having one regular unleaded fuel tank with a capacity of 550 gallons. The database search did not indicate whether or not this fuel tank had ever leaked. Since there is no evidence that this fuel tank has ever leaked, and because it is located one quarter mile from the project site, the potential impact is less than significant.

The Vincent Joyce Site located one mile from the project site to the west was identified in 1983 as a possible lead and acid solution with metals contaminated site. Site screening was performed in 1987 by the EPA's FIT team, who recommended no further action following the site screening. This no further action status was approved by the San Diego County DHS in 1991 and confirmed by Calsites in 1994. Given the no further action status approved by the San Diego County DHS in 1991 and confirmed by Calsites in 1994, the hazardous waste exposure impact would be less than significant.

On-Going Agricultural Operations

Agricultural operations will remain on the project site. Operations on the project site are currently organic; however, there is no guarantee that organic operations would be ongoing. Pesticide, herbicide, and fertilizer usage is regulated by the United State Environmental Protection Agency (USEPA) and the California Department of Pesticide Regulation (DPR) to ensure their use does not degrade environmental resources and to protect public health. Restrictions on pesticide use are set for each pesticide approved by the U.S. EPA and determined separately for each pesticide. Chemical registration application condition requirements are designed to minimize the mobilization of chemicals with restrictions on wind speed, humidity and proximity to open water during application. Label restrictions on pesticide, herbicide and fertilizers are designed to minimize effects to off-site resources. In the future, should pesticides be used on the project site, the owner of the farm operation will be required to adhere to the federal and state requirements that are in place to protect public health, which are existing, during the time period that the farm owner applies the pesticides, herbicides, etc. Additionally, should the farm owner begin applying pesticides or herbicides, the person responsible shall obtain an Operator Identification Number (OID) to begin use of such chemicals, from the San Diego County Department of Agriculture, Weights and Measures (SDAWM). As part of obtaining this OID, the SDAWM may require the notification of all surrounding property owners, both within the subject property and at neighboring properties that pesticides will be applied. That notification may list the type of pesticides and whether the chemical is a restricted substance, which may require other conditions of use, as determined by the SDAWM, at that time. In addition, there are no school facilities within one-quarter mile of the project site. Due to these restrictions and prohibitions on their use in areas that have the potential to impact humans or adjoining property, no impact to future residents on the project site, or off-site residences or schools is identified.

Analysis (Guideline 2 – Compliance with Fire Regulations)

Fuel modification will occur in several zones and will be a joint responsibility of the Homeowners Association (HOA) and future lot owners. The first zone, represented in blue on Figures 1-3 and 1-4, is the Irrigated Zone and covers the first 50 feet from the future homes, or to the property line. This zone is maintained by the home owner and requires a permanent irrigation system to be installed and maintained and limits the types of landscaping to those species that are on the approved on the County Suggested Plant List for a Defensible Space. No combustible structures, such as decks, patio covers or gazebos will be permitted within this area.

The second zone is the Thinning Zone, as depicted in orange and yellow on Figures 1-3 and 1-4. The Thinning Zone is also maintained by the home owner and begins at the outer edge of the Irrigated Zone and extends for a distance of an additional 50 feet. The Thinning Zone is either an agricultural zone, landscaped zone, or a non-irrigated zone where flammable plants shall be removed and the remaining plants shall be thinned by 50 percent. The thinning will be ongoing and occur throughout the year. Approximately 0.6 acre of the proposed Thinning Zone (as shown in yellow on Figure 1-4) is on private property off-site, adjacent to proposed Lots 20 and 21. A 60-foot easement for fire clearing is required to ensure these off-site areas are maintained.

Additional fuel modification is identified for the 30 feet adjacent to roadways and driveways, as well as for off-site property owners, as depicted in light purple on Figures 1-3 and 1-4. Section 4707.2.1(b) of the Consolidated Fire Code, adopted by both the County of San Diego and all fire protection districts in San Diego County in 2009, specifies that property owners adjacent to a public or private driveway constructed after adoption of the Consolidated Fire Code “shall modify combustible vegetation in the area within 30 feet from each side of the road or driveway to establish a fuel modification zone”. Section 4707.2.1(a)

specifies that the applicable fire marshal has the right to enter private property to ensure the fuel modification zone requirements are met. In addition, the Fire Protection Plan for the project, approved by DSFPD in January 2010, requires all property owners adjacent to a public or private road or driveway constructed after January 30, 2008 to clear combustible vegetation 30 feet from each side of the driveway to create a fuel modification zone as provided in page 27 of that report. The approved Fire Protection Plan is included as Appendix J to the EIR. The off-site clearing requirements for the project will be enforced by DSFPD in accordance with the Consolidated Fire Code and the approved Fire Protection Plan for the project.

The project provides 100 feet of fuel treatment from each proposed residence in compliance with the California Fire Code, the County Fire Code and the requirements of DSFPD with one exception. This one exception is the future home on Lot 27. Due to the lot configuration, this future home cannot achieve the required 100 feet of fuel treatment. Zone 1 has therefore been enhanced to the property line for 90 feet to provide the same practical effect as 50 feet of Zone 1 followed by 50 feet of Zone 2 treatment. The 30 feet of fuel modification adjacent to roadways and driveways complies with all applicable fire codes and the requirements of the DSFPD.

Access driveways have been provided with a minimum vertical clearance of 13.5 feet, Aqueduct Road will be improved to 24 feet and graded to 28 feet consistent with the requirements of the DSFPD and Via Ararat Drive will be widened to 22.5 feet which has been approved by the DSFPD. The project provides two points of access for fire and other emergency equipment via both Aqueduct Road and Via Ararat Drive. No locked gates have been proposed as part of the development. Driveways will have a minimum width of 16 feet with pavement meeting DSFPD requirements. Some of the proposed cul-de-sacs will be greater than 150 feet in length; however, all cul-de-sacs will have a minimum turning radius of 40 feet graded and 36 feet improved consistent with DSFPD requirements. No driveways or roadways have been proposed exceeding a 15 percent grade.

Street name signs will be installed in accordance with San Diego County standards and in accordance with DSFPD requirements. The project includes the installation of nine fire hydrants as required by the DSFPD. Fire flow will meet DSFPD requirements of 1,500 gallons per minute at 20 pounds per square inch (PSI). Road and hydrant improvements will be installed and serviceable prior to the issuance of a building permit as mandated by the DSFPD. The DSFPD has reviewed the project Fire Protection Plan and has approved it, finding it meets all DSFPD fire requirements. Therefore, the proposed project is consistent with applicable fire regulations and wildland fire hazard impacts are less than significant.

Analysis (Guideline 3 – Fire Protection Plan)

In order to evaluate the risk and effects of wildfire on the project site and adjacent areas, a Fire Protection Plan was prepared by FIREWISE 2000 (January 2010) to evaluate the risk and present risk abatement regulations for the development of the project site. The fuel management recommendations are in compliance with recommendations of the County of San Diego Department of Planning and Land Use and the DSFPD. The Fire Protection Plan finds the project in compliance with the applicable fire regulations of the California Fire Code, County Consolidated Fire Code and the DSFPD.

Areas surrounding the project site consist principally of estate residential uses in combination with irrigated agriculture. The project will result in two distinct land use types: (1) a 34.3-acre development area to accommodate roads, driveways, building pads and leach field areas and (2) the 58.5-acre irrigated agricultural uses on-site that are likely to remain on the newly created lots. These on-site uses minimize fire risks as a result of the lack of flammable vegetation. No fires have occurred on the project site. The

most notable recent fire was the 2007 Rice Fire located approximately 3 miles from the project site. Two nurseries are located along a small portion of the northern boundary and a large portion of the eastern project boundary.

The project meets all fire code requirements by providing both a primary and secondary means of access to and from the project site. The project site connects to West Lilac Road, a County maintained road, from its eastern boundary along Aqueduct Road and from its western boundary along Via Ararat Drive. All on-site roads will provide a paved width of 30 feet and a graded width of 35 feet meeting all fire code requirements. All streets meet the minimum 28 foot turning radius measured from the inside edge of the improvement width specified in the fire codes.

The project will obtain water from RMWD. The DSFPD requires the fire flow to be 1,500 gallons per minute at 20 PSI residual pressure. The project will comply with this fire flow requirement. The water system for the project will include a loop system. Fire hydrant locations and spacing meet all fire code requirements. The fire protection plan indicates that with the fire treatment proposed, the anticipated flame length from a northeastern fire will be reduced from 45.2 feet to 10.5 feet. For the south and west fire exposure, the flame length will be reduced from 32.8 feet to 6.6 feet. Fuel modification treatments proposed for the project meet all fire code requirements with the exception of Lot 27 which has achieved same practical effect by providing 90 feet of fuel modification Zone 1 treatment. Plant species permitted on site within the fuel treatment areas comply with the plant species listed on the County's approved plant list. The nine additional fire hydrants being provided the project and the widening of Aqueduct Road and Via Ararat Drive will enhance fire fighting capabilities in the area.

The project complies with all requirements contained in the fire protection plan. Accordingly, wildland fire hazards impacts on the project will be less than significant.

Analysis (Guideline 4 – Consistency with Public Facility Element)

The Public Facility Element of the County General Plan includes emergency travel time criteria to minimize fire and emergency risks. For single-family residential lots of less than two acres and more intensive uses, the minimum required travel time is five minutes. For single-family residential lots from two acres to four acres in size, the minimum travel time is ten minutes. For large lot single family residential and agricultural developments with lot sizes of greater than four acres, the minimum travel time is 20 minutes. (Public Facility Element XII-11-12).

The Public Facility Element specifies that in applying emergency time criteria "the proposed land uses and the smallest proposed residential lot will be used to determine the appropriate emergency travel time for each project proposal" (Public Facility Element XII-11-14). Thus, emergency response times required for any project are determined based upon the smallest proposed residential lots under the County's Public Facility Element. In this case, the project proposes 28 residential lots ranging in size from 2.1 acres to 5.9 acres. Fifteen of the 28 proposed lots equal or exceed three acres in size and eight of these lots equal or exceed four acres in size. However, in applying the emergency response time criteria the smallest 2.1-acre lot has been utilized resulting in a maximum emergency response time of 10 minutes in accordance with the County Public Facility Element.

The closest fully staffed fire station to the project site is the CALFIRE station at 9127 West Lilac Road located 2.6 miles from the project site. The fire response from this fully manned station to the project site is 4 to 6 minutes, which is well below the 10-minute response time specified as adequate in the County's Public Facility Element. As a result, the project fully complies with the County's emergency response time travel requirements and wildland fire hazards impacts on the project will be less than significant.

3.1.4.3 Cumulative Impact Analysis

Hazardous Materials

All of the cumulative projects presented in Table 1-2 were considered in the hazardous materials cumulative analysis. These cumulative projects either had no impact or less than significant impacts related to hazardous materials. Further, impacts for handling hazardous agricultural materials for the proposed project and the cumulative projects were determined to be less than significant because use and transport of these materials would impact a localized area and are regulated by SDAWM. Therefore, any cumulative hazardous materials impacts would be less than significant.

Wildland Fires

For the purposes of the cumulative fire safety impact, the entire DSFPD service district would be the cumulative analysis area. All of the cumulative projects receiving fire service from the DSFPD are required to prepare a Fire Protection Plan demonstrating all potential fire impacts have been mitigated to a level of insignificance and this Fire Protection Plan must be approved by both the County of San Diego Department of Planning and Land Use and the DSFPD. In addition, all of the cumulative projects are required to meet all fire service requirements of the DSFPD. Since all of the cumulative projects are required to obtain approval of and implement a Fire Protection Plan which mitigates potential fire impacts and demonstrates compliance with the Fire Code and requirements of the DSFPD, the project's and the individual cumulative projects' impacts are less than significant. Cumulative service impacts that may result would be managed by the DSFPD in their determination whether new projects are eligible for service. Design features and existing regulations that apply to the cumulative projects reduce potential cumulative fire impacts to less than significant.

3.1.4.4 Significance of Impacts Prior to Mitigation

With the design features incorporated into the project listed in Table 1-1 and as shown in Sections 3.1.4.2 and 3.1.4.3, the proposed project will have less than significant project- and cumulative-level impacts related to hazards, hazardous materials or fire safety and no mitigation is required.

3.1.4.5 Conclusion

With the design features incorporated into the project listed in Table 1-1 and based upon the analysis presented in Sections 3.1.4.2 and 3.1.4.3, the proposed project will have less than significant project-level and cumulative impacts related to hazards/hazardous materials and fire safety.