

P-OS area calls for the development of hiking and biking trails, picnic areas, and other passive recreational activities.

The AH-SP states that it is consistent with the Carlsbad General Plan Open Space and Conservation Element because hazardous soils tests have been conducted and soil/geotechnical evaluations are required by the EPFs.(Policy C.16¹³) However, no EPFs require soil testing for contamination.

No discussion about potential soil remediation efforts has been included in the EA. The Phase I Environmental Site Assessment (ESA) conducted in 2004 recommended that an assessment of the vertical extent of toxaphene¹⁴ (a common agricultural pesticide) across the area be conducted to more accurately assess the volume of OCP impacted soil prior to site redevelopment. While this has been done for the VSC portion of the AH-SP, no information is available on the extent of toxaphene in other areas of the AH-SP. The EA states that it is estimated that less than 6,000 cubic yards of soil contain toxaphene at levels exceeding state standards for commercial/industrial use. However, it is unclear if this amount of soil is just for the VSC portion of the AH-SP.

Based on the 2004 ESA, the total estimated volume of OCP impacted soil within the site is 191,000 cubic yards. If OCP impacted soil needs to be removed from the site, the estimated cost to load, transport and dispose of this soil at an approved landfill in San Diego County is approximately \$16.4M. This estimated cost includes preparing a Property Mitigation Plan for submittal and approval with the County of San Diego Department of Environmental Health (SDDEH), collection and testing of profile samples, collection and testing of confirmation samples, monitoring of removal of OCP impacted soil, loading, transporting and disposal of OCP impacted soil at an approved landfill in San Diego County and preparation of mitigation closure report for submittal to SD-DEH.¹⁵ The EA does not discuss the potential impacts on hazards if contaminated soil would be removed from the AH-SP.

Implementation of the AH-SP would result in a variety of hazardous substances and wastes being used, generated, and stored on the site during construction and operational activities.¹⁶ Transportation, use, and disposal of these substances and waste materials must comply with all federal, state, and local laws regulating the management and use of hazardous materials during

¹³ Policy C.16 states, "Prior to the approval of new development within an existing or former agricultural area in Carlsbad, require a detailed soils testing and analysis report be prepared by a registered soils engineer and submitted to the city and the county health department for review and approval. This report shall evaluate the potential for soil contamination due to historic use, handling, or storage of agricultural chemicals restricted by the San Diego County Department of Health Services. If hazardous chemicals are detected at concentrations in the soil that would have a significantly adverse effect on human health, the report shall identify a range of possible mitigation measures to remediate the significant public health impacts."

¹⁴ Toxaphene, also known as camphachlor, chlorocamphene, polychlorocamphene, and chlorinated camphene, is a highly toxic and bioaccumulative organic insecticide. It is one of the so-called Dirty Dozen, a group of 12 chemicals that are considered highly toxic and associated with numerous diseases and birth defects in livestock and humans. The EPA has canceled all uses of toxaphene and outlawed general use as of March 1, 1990. Toxaphene is bioaccumulative and is readily stored in fats. There have yet to be human studies to examine the effects of long-term, low-level toxaphene exposure, but animal studies have been conducted. In rats, it is seen to be a developmental toxicant, a nervous system toxicant, and a possible carcinogen.

¹⁵ This cost estimate was prepared without the benefit of discussing the site issues and remedial alternatives with the local oversight regulatory agency, the SD-DEH. Therefore, other more cost effective remediation approaches, besides excavation and removal may be considered, if approved by the SD-DEH. Also note that this cost is pulled from the 2004 ESA.

¹⁶ These include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers.