4.8 Hazards and Hazardous Materials

This section describes the environmental and regulatory settings, and discusses potential impacts associated with, the construction and operation of the Santa Barbara County Reliability Project (proposed project) with respect to hazards and hazardous materials. The work associated with the Getty, Goleta, Ortega, Ventura, and Santa Barbara Substations would occur within existing structures and would not involve the use of or exposure to hazardous materials; therefore, these components of the proposed project are not discussed further in this section. Impacts from geologic hazards are discussed in Section 4.6, "Geology, Soils, and Minerals"; transportation hazards are further discussed in Section 4.15, "Transportation and Traffic"; and impacts on government facilities, including those for fire and police protection, are further discussed in Section 4.13, "Public Services and Utilities."

4.8.1 Environmental Setting

4.8.1.1 Hazardous Materials Sites

A "hazardous material" is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment (California Health and Safety Code, Chapter 6.95, Section 25501(o)). Per Title 22 of the California Code of Regulations (CCR), Division 4.5, Chapter 11, materials and waste may be considered hazardous if they exhibit one or more of the following characteristics: ignitability (can be ignited by open flame); corrosivity (corrode other materials); reactivity (react violently, explode, or generate vapors when mixed with water); or toxicity (are poisonous). Hazardous materials have the potential to leach into soils, surface water, and groundwater when spilled or released, causing soil, water, or groundwater contamination. Soils possessing contamination levels in excess of governmental thresholds for certain substances must be treated as hazardous waste during their excavation, transport, and disposal. For this reason, the handling, transport, and disposal of hazardous materials is heavily regulated by policies from agencies at the federal, state, and local levels in order to protect humans and the environment from exposure to hazards associated with accidental spills or illicit releases.

The proposed project area crosses urban and rural areas in unincorporated Santa Barbara and Ventura Counties, as well as the cities of Carpinteria, Santa Barbara, and Ventura. A small portion of the proposed project area is located in U.S. Forest Service (USFS)-managed land in the Los Padres National Forest.

Cortese List Sites

State of California Government Code Section 65962.5 (often referred to as the "Cortese List") is composed of the State Water Resource Control Board's (SWRCB's) Geotracker database, solid waste disposal sites list, Cease and Desist Orders and Cleanup and Abatement Orders list. The California Department of Toxic Substance Control's (DTSC's) EnviroStor database and hazardous waste sites composes the provisions of Government Code Section 65962.5 (often referred to as the "Cortese List"). A review of the Cortese List sources did not identify any SWRCB Geotracker sites, solid waste disposal sites, Cease and Desist Orders and Cleanup and Abatement Orders sites, DTSC Envirostor, or hazardous waste sites within 1,000 feet of the proposed project (SWRCB 2014, 2013a,b; DTSC 2012, 2013).

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4.8.1.2 Schools

 Four schools are located within 0.25 miles of the proposed project components, as shown in Table 4.8-1.

Table 4.8-1 Schools within 0.25 Miles of Components of the Proposed Project

School	Address	Approximate Distance/Direction from Nearest Project Component
Carpinteria High School	4810 Foothill Road, Carpinteria, CA 93013	Adjacent to Carpinteria Substation and Segment 4
Rincon High School	4698 Foothill Road, Carpinteria, CA 93013	0.25 miles west of Segment 4
Canalino Elementary School	1480 Linden Ave., Carpinteria, CA 93013	0.22 miles south of Segment 3a
Howard Carden School (Private)	5315 Foothill Road Carpinteria, CA 93013	0.03 miles south of Segment 3a

4.8.1.3 Airports and Airstrips

No project components are located within 2 miles of a public or private airport or airstrip. The nearest heliport is the Southern California Edison (SCE) Ventura Service Center heliport, located approximately 1.25 miles from the Santa Clara Substation.

4.8.1.4 Emergency Response Plans

Ventura County, Santa Barbara County, and the City of Carpinteria have developed and implemented several emergency response plans to help the communities prepare for and organize the responses to natural and human-caused disasters. Emergency response and evacuation plans that apply to the proposed project area include the Santa Barbara County Hazardous Materials Emergency Response Area Plan, Santa Barbara County General Plan Seismic Safety and Safety Element, Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan, Ventura County Multi Hazard Functional Plan, Ventura County General Plan Hazards Appendix, and City of Carpinteria General Plan Safety Element. Daily administration of the disaster preparedness and response programs for these areas is handled by the Santa Barbara County Fire Department, Ventura County Sheriff's Office of Emergency Services, and City of Carpinteria Police Department in the respective jurisdictions.

The City of Carpinteria identified Highway 101 and Union Pacific Railroad as primary and secondary evacuation routes. The remaining emergency response plans applicable for the project area have not identified emergency response routes.

4.8.1.5 Fire Hazards

Santa Barbara and Ventura Counties experience annual cycles of elevated wildland fire danger. Wildland fires resulting from either natural (e.g., lightning) or anthropogenic (e.g., cigarettes dropped in dry brush) causes can ignite and spread quickly, destroying the natural landscape and threatening the lives and personal property of residents located in wildfire-prone areas.

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Fire Hazard Severity Zones

- 2 The California Department of Forestry and Fire Protection (CALFIRE) is the state agency
- 3 responsible for fire protection in State Responsibility Areas (SRAs) of California and also identifies
- 4 and maps fire risks in SRA's, Federal Responsibility Areas (FRAs), and Local Responsibility Areas
- 5 (LRAs). CAL FIRE identifies five types of fire hazard severity (extreme, very high, high, moderate,
- 6 and little or no threat) and issues recommendations for Very High Fire Hazard Severity Zones. In
- 7 January 2008, CALFIRE updated these Fire Hazard Severity Zone (FHSZ) maps to reflect revised
- 8 Very High FHSZ for LRAs throughout California. The counties of Santa Barbara and Ventura
- 9 participated in this update to ensure the accuracy of mapped areas within each County's LRA. The
- 10 fire hazard severity zones for each project component are shown on Figure 4.8-1. Proposed project
- components within urbanized locations, including the Santa Barbara, Ortega and Ventura
- 12 Substations, are not subject to wildland fire hazard analysis by CALFIRE.

1314 Recent Fires

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- 15 In the proposed project area, elevated wildland fire risk is associated with the area's low annual
- 16 precipitation rate, highly flammable native vegetation, and susceptibility to high velocity
- 17 "sundowner" and "Santa Ana" winds that occur predominantly during late summer and fall. These
- dry and windy conditions make the area between Los Angeles and Santa Barbara highly susceptible
- 19 to ignition, and in recent years several large wildland fires have occurred, requiring responses by
- 20 local firefighters. Recent fires that have required a response by fire response agencies in Santa
- 21 Barbara and Ventura Counties are described below.

Tea Fire

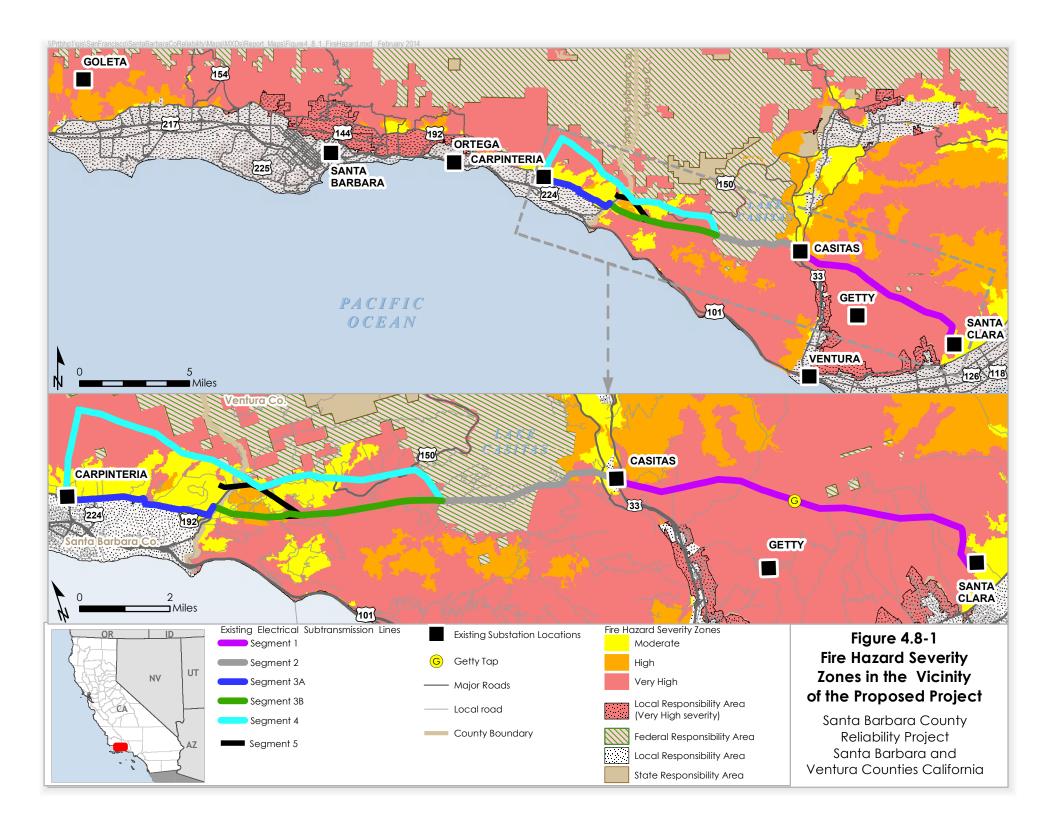
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- 24 The Tea Fire burned approximately 1,940 acres in Montecito, California, near Cold Springs Creek
- and Hot Springs Road (approximately 8 miles west of the Carpinteria Substation) in November
- 26 2008. During the fire, 210 residences were destroyed, and the fire and smoke damaged local
- 27 transmission lines, affecting their use during emergency conditions. The cause of the fire was
- 28 attributed to a brush fire that spread rapidly throughout the area due to strong winds (CALFIRE
- 29 2008).

Guiberson Fire

- 32 In September 2009, the Guiberson Fire burned approximately 17,500 acres in Guiberson Canyon
- 33 (approximately 18 miles east of the Santa Clara Substation). The Ventura County Fire Department
- 34 led the six-day firefighting and emergency response effort, which also required cooperation from
- 35 CALFIRE, USFS, Ventura County Sheriff, California Highway Patrol (CHP), California Emergency
- 36 Management Agency (CalEMA), California Coastal Commission, Bureau of Land Management, City
- of Moorpark, Southern California Gas, SCE, and the American Red Cross (CALFIRE 2009). During
- 38 the fire, one building was destroyed, 10 people were injured, and there was a total of \$9.8 million in
- damages (CALFIRE 2009). According to reports from Ventura County Fire Department, the cause of
- 40 the fire was attributed to the spontaneous combustion of a mulch pile (Wildfire Today 2010).



White Fire

In May 2013, the White Fire occurred several miles northwest of the Goleta Substation. The blaze lasted from May 27 through May 30th, and in this short time the brush fire burned a total of 1,984 acres. Fuels involved in the fire included dry chaparral, grass, brush, and oak trees. Extreme terrain made access for firefighting efforts difficult. Several cooperating agencies were involved, including the USFS, Santa Barbara County, Santa Barbara City, Carpinteria/Summerland Fire, Montecito Fire, Lompoc Fire, Santa Maria City Fire, Chumash Fire, Santa Barbara County Sheriff's Department, Santa Barbara County Search and Rescue, CHP, and the American Red Cross (USFS 2013).

4.8.2 Regulatory Setting

4.8.2.1 Federal

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, outlines regulations for the cleanup of toxic waste sites nationwide. In 1986, Superfund was amended by the Superfund Amendment and Reauthorization Act (SARA) Title III, also known as the Emergency Planning and Community Right-to-Know Act. SARA Title III and the Clean Air Act of 1990 established a nationwide emergency planning and response program and imposed reporting requirements for businesses that store, handle, or produce significant quantities of extremely hazardous materials. These acts require states to implement a comprehensive system to inform local agencies and the public when a significant quantity of such material is stored or handled at a facility.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 (15 United States Code 2601, et seq.) authorizes the United States Environmental Protection Agency (EPA) to track industrial chemicals produced within or imported into the United States. Under this act, the EPA screens and tests industrial chemicals that pose a potential health hazard to humans and/or the environment. This act grants the EPA the authority to control and ban newly developed industrial chemicals and other chemicals that pose a risk in order to protect public and environmental health.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) regulates hazardous waste from the time that waste is generated through to its management, storage, transport, treatment, and final disposal. The EPA has authorized the DTSC to administer the State's RCRA programs. A RCRA hazardous waste exhibits at least one of four characteristics: ignitability, corrosivity, reactivity, or toxicity. To keep track of hazardous waste activities, treatment, storage, and disposal, facility owners and operators must keep certain records and submit reports to the EPA at regular intervals. All facilities that generate, transport, recycle, treat, store, or dispose of hazardous waste are required to notify the EPA (or its state agency) of their hazardous waste activities. An EPA Identification Number must be obtained unless the waste has been excluded from regulation or exempted. National Biennial RCRA Hazardous Waste Reports Sections 3002 and 3004 of RCRA require that the EPA collect information pertaining to hazardous waste management from hazardous waste generators and hazardous waste treatment, storage, and disposal facilities every

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two years. RCRA is relevant to the proposed project because it would regulate all used transformer oil and hazardous waste resulting from project construction and operation.

Hazardous Materials Transportation Act

The primary objective of the Hazardous Materials Transportation Act (HMTA) of 1975 is to provide adequate protection against risks to life and property inherent in the transportation of hazardous materials in commerce. The HMTA empowers the U.S. Department of Transportation (DOT) to regulate the transportation of hazardous materials by rail, aircraft, vessel, and public highway. Amendments in 1976 and 1990 substantially revised existing provisions and added new requirements for chemicals that the DOT has determined pose unreasonable risks to health, safety, and property during transport activities. Hazardous materials regulations are subdivided by function into four areas:

- Procedures and/or Policies 49 Code of Federal Regulations [CFR] Parts 101, 106, and 107;
- Material Designations 49 CFR Part 172;
 - Packaging Requirements 49 CFR Parts 173, 178, 179, and 180; and
 - Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177.

National Fire Protection Association 780, National Electrical Code

To avoid electrical hazards, a thorough knowledge by electrical contractors of the National Electric Code (NEC) is required to install any electrical power system. The NEC covers the installation of electrical conductors, equipment, and raceways; signaling and communications conductors; and equipment and optical fiber cables for public and private premises.

Oil Pollution Prevention

The objective of the oil pollution prevention regulation in 40 CFR Part 112 is to prevent oil discharges from reaching navigable waters of the United States or adjoining shorelines. This regulation was also written to ensure effective response to oil discharge. It further requires that proactive measures be used to respond to oil discharge. It contains two major types of requirements: prevention requirements (the Spill Prevention, Control, and Countermeasure [SPCC] rule) and Facility Response Plan requirements.

SPCC Plans are required for facilities that are non-transportation-related, have an aggregate aboveground storage capacity greater than 1,320 gallons or a completely buried storage capacity greater than 42,000 gallons, and that have a reasonable expectation of a discharge into or upon navigable waters of the United States (refer to Section 4.9, "Hydrology and Water Quality"). SCE's current SPCCs for the Carpinteria, Casitas, and Santa Clara Substations would be updated as required for the proposed project.

Transformer Oil Transport and Recycling

Title 49 CFR Part 130 applies to the transport of transformer oil (mineral oil) when shipped in containers of 3,500 gallons or more. According to 49 CFR Part 130, containers used for the transportation of oil subject to this part must be designed, constructed, maintained, closed, and loaded such that under conditions normally incident to transportation, there will be no release of oil to the environment. In addition, a response plan must be developed pursuant to 49 CFR Part

130 requirements. Standards for the recycling of used transformer oil are established in 40 CFR Part 279.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration (OSHA) administers Occupational Safety and Health Standards (29 CFR Sections 1910 and 1926) that (1) provide regulations for safety in the workplace; (2) regulate construction safety; and (3) require a Hazard Communication Plan to identify and inventory all hazardous materials and material safety data sheets. OSHA's standards also require employee training in safe handling of hazardous materials. OSHA standards are relevant to the proposed project because its construction and operation would involve the use of heavy-duty equipment, helicopters, and heavy-duty and lighter vehicles that may pose health and safety risks to workers. In addition, workers would handle and use chemical substances.

Federal Aviation Administration

Under 14 CFR Part 77.9, notification of construction or alteration to the Federal Aviation Administration (FAA) is required for any structures taller than 200 feet.

Los Padres National Forest Land Management Plan

The Los Padres National Forest Land Management Plan (Forest Plan) contains standards and guidelines to protect water, wilderness, wildlife, recreation, scenic landscapes, and heritage resources in the Los Padres National Forest (USFS 2005). The Forest Plan includes several program strategies and tactics for preventing fire, such as the removal of dead vegetation, thinning (removal of living trees from overstocked stands), fuelbreak maintenance, and installing Wildland-Urban Interface Defense and Threat Zones to ensure that defensible spaces are adequate to reduce the risk of catastrophic wildland fire (USFS 2005).

4.8.2.2 State

California Code of Regulations, Title 22, Chapter 11

CCR Title 22, Division 4.5, Chapter 11 contains regulations for the identification and classification of hazardous wastes. This code defines a waste as hazardous if it has any of the following characteristics: ignitability, corrosivity, reactivity, or toxicity. Article 3 provides detailed definitions of each characteristic. Articles 4 and 5 provide lists of RCRA hazardous wastes, non-RCRA hazardous wastes, hazardous wastes from specific sources, extremely hazardous wastes, hazardous wastes of concern, and special wastes.

California Health and Safety Code

The California Environmental Quality Act (CEQA) guidelines define "extremely hazardous substances" as those defined by Section 25532(2)(g) of the California Health and Safety Code. These include the substances listed in Appendix A of Part 355 (commencing with Section 355.10) of Subchapter J of Chapter I of Title 40 of the CFR, which provides a list of extremely hazardous substances and their threshold planning quantities.

The CEQA Guidelines define "hazardous air emissions" as emissions of air contaminants identified as toxic by the California Air Resources Board or the designated air pollution control officer. These include substances identified in Section 44321(a to f) of the California Health and Safety Code.

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Section 25150.7 of the California Health and Safety Code outlines procedures and regulations for the management and disposal of treated wood waste. Wood waste, including the type of wood utility poles that would be disposed as part of the proposed project, may be treated with preservatives and other chemicals to protect the wood. Because the chemical treatments could leach into water supplies when disposed of, Section 25150.7 was developed to restrict how and where treated wood waste can be disposed.

Government Code Section 65962.5: Cortese List

The Cortese List includes all hazardous waste facilities subject to corrective action; land designated as hazardous waste property or border zone property; information received by the DTSC about hazardous waste disposals on public land; sites listed pursuant to Section 25356 of the Health and Safety Code (removal and remedial action sites); and sites included in the Abandoned Site Assessment Program. Pursuant to Government Code Section 65962.5, the DTSC compiles and updates the Cortese List as appropriate, but at least annually.

Hazardous Waste Control Act

The Hazardous Waste Control Act established the state hazardous waste management program, which is similar to, but more stringent than, RCRA program requirements. CCR, Title 26 describes the requirements for the proper management of hazardous waste under the Hazardous Waste Control Act, including the following:

- Identification and classification;
- Generation and transportation;
 - Design and permitting of recycling, treatment, storage, and disposal facilities;
 - Treatment standards;
 - Operation of facilities and staff training; and
 - Closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for the identification, packaging, and disposal of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must document waste from generation to transporter to disposal. Copies of this documentation must be filed with the DTSC.

The DTSC operates programs to protect California from exposure to hazardous wastes through the following practices and procedures:

- Handling of the aftermath of improper hazardous waste management by overseeing site cleanup;
- Prevention of the release of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly;
- Enforcement against those who fail to appropriately management hazardous wastes;
- Exploration and promotion of measures to prevent pollution and encourage reuse and recycling;

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- Evaluation of site-specific soil, water, and air samples and the development of new analytical methods;
- Practice in other environmental sciences, including toxicology, risk assessment, and technology development; and
- Involvement of the public in the DTSC's decision making.

Emergency Services Act

 Under the Emergency Services Act, the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous material or hazardous waste is an important segment of the plan administered by CalEMA. CalEMA coordinates the response of agencies that include the California Environmental Protection Agency, California Department of Transportation, CHP, regional water quality control boards (RWQCBs), air quality management districts, and county disaster response offices.

California Occupational Health and Safety Administration

The California Occupational Health and Safety Administration (Cal/OSHA) is responsible for the development and enforcement of workplace safety standards and ensuring worker safety in the handling and use of hazardous materials. Cal/OSHA requires businesses to prepare Injury and Illness Prevention Plans and Chemical Hygiene Plans. The Cal/OSHA Hazards Communication Standard requires that workers be informed of the hazards associated with the materials they handle. Manufacturers are required to label containers, provide Material Safety Data Sheets in the workplace, and provide worker training.

Under CCR, Title 8, Cal/OSHA establishes requirements for safe working conditions and safety-related reporting in California and regulates electrical safety (Electrical Safety Orders). The primary intent of the Title 8 requirement is to protect workers, but compliance with these regulations also reduces potential hazards for non-construction workers and project vicinity occupants through the implementation of required controls relating to site monitoring, reporting, and other activities.

California Public Resources Code

The California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that has an internal combustion engine; specify the requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided onsite for various types of work in fire-prone areas.

Specifically, Sections 4292 and 4293 of the California Public Resources Code address vegetation management in transmission line corridors. Within SRAs that include mountainous land, forest-covered land, brush-covered land, or grass-covered land, owners and managers of electrical transmission lines are required to maintain a firebreak consisting of a clearing of not less than 10 feet in each horizontal direction from the entire outer circumference of poles or towers that support electrical infrastructure that could be a source of ignitions and therefore present a fire risk, including switches, fuses, transformers, and lightning arresters. California Public Resources Code Section 4293 requires the felling, cutting, or trimming of dead, rotten, decayed, diseased, or otherwise weakened trees that may affect or fall on an electric line.

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California Public Utilities Commission General Orders and Decisions

The California Public Utilities Commission (CPUC) regulates the construction and operation of overhead transmission lines in California through the implementation and oversight of several rules and regulations known as General Orders (GOs) and CPUC Decisions. GOs 95, 165, and 166 and CPUC Decision 12-01-032 would apply to the proposed project, as described below.

GO 95: Rules for Overhead Electric Line Construction

GO 95 is the main CPUC rule regulating the design, construction, operation, and maintenance of overhead electric lines in California. This order includes safety standards for overhead electric lines, including minimum conductor ground clearance, electric line inspection requirements, and vegetation clearance requirements. Rule 35, Tree Trimming, defines minimum vegetation clearances around power lines. This rule also requires that utility providers remove dead, rotten, and diseased trees that overhang or lean toward a span of an electric line. Rule 31.2, Inspection of Lines, requires that lines be inspected frequently to ensure that they are in good condition and that lines temporarily out of service be inspected and maintained to prevent a hazard.

GO 166: Standards for Operation, Reliability, and Safety During Emergencies and Disasters

GO 166 applies to all electric utilities subject to the jurisdiction of the CPUC and addresses electric service reliability and safety. The purpose of this order is to ensure that jurisdictional electric utilities are prepared for emergencies and disasters in order to minimize damage and inconvenience to the public that may occur as a result of electric system failures, major outages, or hazards posed by damage to electric distribution facilities. Investigations required by this order are conducted following every major outage, pursuant to and consistent with Public Utilities Code Section 364(c) and CPUC policy.

CPUC Order Instituting Rulemaking to Revise and Clarify Commission Regulations Relating to the Safety of Electric Utility and Communications Infrastructure Provider Facilities (R.08-11-005)

In November 2008, the CPUC issued the Order Instituting Rulemaking to Revise and Clarify Commission Regulations Relating to the Safety of Electric Lines and Communications Infrastructure Provider Facilities (Electric Safety OIR). The purpose of the Electric Safety OIR was to determine whether CPUC regulations addressing potential hazards, such as fires, that could result from electric transmission and distribution lines required revision or clarification.

The CPUC issued Decision 09-08-029 (Phase 1 – Measures to Reduce Fire Hazards in California Before the 2009 Fall Fire Season, or Phase 1 Decision) in this proceeding in August 2009. The Phase 1 Decision required the application of GO 95 to non-electric utilities (such as SoCalGas). In the next phase of this proceeding (Decision 12-01-032 – Decision Adopting Regulations to Reduce Fire Hazards Associated with Overhead Power Lines and Communication Facilities, or Phase 2 Decision), on January 12, 2012, the CPUC adopted an order instituting rulemaking to revise and clarify CPUC regulations relating to the safety of electric utility and communications infrastructure provider facilities. This decision adopted further regulations to reduce fire hazards associated with overhead power lines and aerial communication facilities located in close proximity to power lines, including revisions to GO 95, GO 165, and GO 166. GO 166 was revised to require investor-owned electric utilities in southern California, such as SCE, to prepare and submit plans to prevent power-line fires during extreme weather events. In addition, the Phase 2 Decision clarified that certain

inspection and reporting requirements under GO 165 were now applicable to facilities belonging to non-electric utilities, such as the storage field property owned and operated by SoCalGas.

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The CPUC is anticipated to issue a Phase 3 Decision under the Electric Safety OIR that will establish regulations for electric distribution lines in areas of high fire risk. Phase 3 will address the establishment of:

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• Standards for wood structures and materials that will allow utilities to reliably obtain prescribed safety factors enforceable by the CPUC;

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Modern materials and practices, with the goal of improving fire safety; and

11 12 • Fire safety standards for the design and construction of electrical infrastructure in areas of high fire threat.

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In addition, the Phase 3 Decision will address whether and how proposed fire safety standards should apply to existing facilities in high fire threat districts, as well as the development of a plan for reporting to the Commission's Consumer Safety and Protection Division.

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Underground Service Alert (DigAlert)

Government Code 4216 *et seq.* defines emergency notification procedures for subsurface excavations and installations. Pursuant to Government Code 4216, SCE would contact the Underground Service Alert of Southern California prior to construction of the proposed project (DigAlert 2013).

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4.8.2.3 Regional and Local

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California Standardized Emergency Management System

27 The California State Legislature passed Senate Bill 1841, with the intent of improving the 28 coordination of state and local responses during disaster incidents. Under Senate Bill 1841, the 29 Office of Emergency Services was required to establish the Standardized Emergency Management 30 System (SEMS) in coordination with state and local agencies. The SEMS system provides a common management structure and language to aid in coordination between agencies and local 31 governments. The SEMS system also established a master mutual aid agreement and program. 32 33 Local governments are required to use SEMS in order to be eligible for state funding for emergency 34 response services.

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Certified Unified Program Agency

37 Administration of the Certified Unified Program Agency (CUPA) is authorized by the California 38 Health and Safety Code (Chapter 6.11, Sections 25404-25404.8) and CCR (Title 27, Division 1, 39 Subdivision 4, Chapter 1, Sections 15100–15620). The CUPA is implemented at the local level by 40 government agencies certified by the secretary of the California Environmental Protection Agency. 41 The CUPA consolidates, coordinates, and makes consistent the administrative requirements, 42 permits, inspections, and enforcement activities of environmental and emergency response 43 programs such as Uniform Fire Code Article 80 Hazardous Materials Business Plans (HMBPs), SPCC 44 Plans, and Hazardous Waste Generator and Onsite Hazardous Waste Treatment Program permits. 45 Local CUPAs for the proposed project area are described in detail in Section 4.8.2.3 of this EIR.

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- 1 The CUPAs with jurisdiction in the proposed project area include the Santa Barbara County Fire
- 2 Department Hazardous Materials Unit (Santa Barbara County Fire Department 2013), Ventura City
- 3 Fire Department, and Ventura County Environmental Health Division (County of Ventura
- 4 Environmental Health Division 2012).

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Santa Barbara County Code of Ordinances

The County of Santa Barbara Code of Ordinances Section 10-3.1.2(C) amends Section 702A of the California Building Code (otherwise adopted by the County) to add a High Fire Hazard Area definition.

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The Santa Barbara County FHSZ map is adopted through County Code Chapter 10 - Building Regulations and used by several County departments for hazard planning, mitigation and response, land use planning, and in the development review process (County of Santa Barbara 1979).

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Santa Barbara County General Plan

A number of policies presented in the Santa Barbara County General Plan, Seismic Safety and Safety Element, are directed at identifying and reducing fire hazards, such as:

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- **Fire Policy 8:** The County Office of Emergency Services shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.
- **Fire Policy 9:** The County shall minimize the potential effects of fire hazards through the development review process pursuant to State law.
 - **Fire Policy 10:** The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from fire-related activity to property and lives.

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Santa Barbara County Communities Wildfire Protection Plan

The Santa Barbara County Communities Wildfire Protection Plan (CWPP) fulfills the state requirements of a Unit Fire Management Plan for entities such as Santa Barbara County that act as an agent to CALFIRE. The CWPP also fulfills regulatory compliance of the 2003 Healthy Forests Restoration Act, -which requires the development of community wildfire protection plans for local jurisdictions. The CWPP describes the Santa Barbara County Fire Department's planning process, administrative activities required for wildfire protection, identification of wildfire hazards, completion of a wildfire risk assessment, and identification of at-risk communities and target planning blocks (County of Santa Barbara 1979).

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Ventura County General Plan

The Ventura County General Plan, Seismic Safety and Safety Element, includes goals and policies pertaining to hazards and hazardous materials; however, none of the goals and policies would apply to the proposed project.

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Ventura County Ojai Valley Area Plan

- 44 The Ventura County Ojai Valley Area Plan includes goals and policies pertaining to hazards and
- 45 hazardous materials; however, none of the goals and policies would apply to the proposed project
- 46 (Ventura County 2008).

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Ventura County Code of Ordinances

Per the Ventura County Fire Protection District Ordinance Number 27, M103, fire officials may restrict entry to public lands during wildfires. The fire code official is authorized to determine and publicly announce when Wildland Urban Interface (WUI) zone or FHSZ areas shall be closed to entry and when the areas should be reopened. Entry into and occupation of WUI or FHSZ areas is prohibited, except for public roadways, inhabited areas, or established trails and campsites that have not been closed when the WUI or FHSZ area is closed to entry.

City of Ventura General Plan

The City of Ventura General Plan includes goals and policies pertaining to hazards and hazardous materials; however, none of the goals and policies would apply to the proposed project (City of Ventura 2005).

City of Carpinteria General Plan and Local Coastal Program

The Safety Element of the City of Carpinteria General Plan and Local Coastal Program includes objectives and policies pertaining to hazards and hazardous materials which would apply to the proposed project, such as"

• **Objective S-5:** Minimize the potential risks and reduce the loss of life, property and economic and social dislocation resulting from urban and wildland fires.

• **Policy S-5a:** All new structures must adhere to the Carpinteria-Summerland Fire Protection District Ordinance and the Santa Barbara County Fire Department Ordinances, where applicable (City of Carpinteria 2003).

4.8.3 Impact Analysis

4.8.3.1 Methodology and Significance Criteria

The evaluation of impacts of hazards and hazardous materials from construction and operation of the proposed project was based on the review of relevant federal, state, county, and local laws, regulations, plans (e.g., emergency response and hazard mitigation plans), policy documents, and standards, as well as hazards and hazardous materials that would be associated with construction, operation, and maintenance of the proposed project components, as described in Chapter 2, "Project Description." State, county, and local maps were reviewed to determine the location of proposed project components in proximity to schools, known hazardous materials sites, airports, and fire severity zones as classified by CALFIRE. The results of Cortese List database searches for known hazardous materials sites were reviewed as described in Section 4.8.1.1.

Potential impacts from hazards and hazardous materials were evaluated according to the following significance criteria. The criteria were defined based on the checklist items presented in Appendix G of the CEQA Guidelines. The proposed project would cause a significant impact related to hazards and hazardous materials if it would:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

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- b) 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;
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school;
- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.; and
- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- h) 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.

4.8.3.2 Applicant Proposed Measures

As part of the proposed project design, the applicant has committed to the following applicant proposed measure (APM) as part of the design of the proposed project:

APM GEN-1: The applicant would develop a Worker Environmental Awareness Plan. The applicant would also prepare a presentation used to train all site personnel prior to the commencement of work. A record of all trained personnel would be kept.

In addition to instruction on compliance with APMs and any mitigation measures identified, all construction personnel would also receive the following:

- A list of phone numbers for the applicant's environmental specialist personnel associated with the proposed project (archaeologist, biologist, environmental compliance coordinator, and regional spill response coordinator).
- Instruction on the Santa Barbara County APCD and Ventura County APCD fugitive dust rules.
- Instruction on biological resources (including special-status species and other sensitive habitats and resources that could occur in the vicinity of the proposed project); the locations of sensitive resources; the legal status and protection afforded these species; and the measures to be implemented for avoidance and minimization of impacts to the resources. Penalties for violations of environmental laws will also be incorporated into the training.
- A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation; a discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and the applicant policies; a review of

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- archaeology, history, prehistory, Native American cultures, and paleontological resources in the proposed project vicinity; and instruction regarding what typical cultural resources look like.
 - Instruction regarding the procedures to be implemented should unanticipated cultural resources (as well as paleontological resources) be encountered during construction activities, including stopping work in the vicinity of the find and contacting the archaeologist or environmental compliance coordinator, who would provide guidance on how to proceed.
 - Instruction regarding the importance of maintaining a clean construction site, including ensuring that all food scraps, wrappers, food containers, cans, bottles, and other trash from the proposed project are deposited in closed trash containers. Trash containers would be removed from the project area as required and would not be permitted to overfill.
 - Instruction regarding the individual responsibilities under the Clean Water Act, the project SWPPP, site-specific BMPs, and the location of Material Safety Data Sheets for the proposed project.
 - Instructions to notify the foreman and regional spill response coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination.
 - A copy of the truck routes to be used for material delivery.
 - Instruction that noncompliance with any laws, rules, regulations, or mitigation measures
 could result in being barred from participating in any remaining construction activities
 associated with the proposed project.

4.8.3.3 Environmental Impacts

Impact HZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

LESS THAN SIGNIFICANT

Construction

 Construction activities associated with the proposed project would involve transport, use, and disposal of hazardous materials. This would include the use of hazardous materials typically used by construction vehicles and heavy equipment (e.g., gasoline, diesel fuel, transmission fluid, brake fluid, hydraulic fluid, solvents, motor oils, and lubricating grease), primarily within the subtransmission line rights-of-way and at the project staging areas. Additionally, on a more temporary basis, construction of the subtransmission line and substation work would involve the use of other potentially hazardous materials, including welding materials, propane, paints, canned spray paint, paint thinner, battery acid in the substation control rooms, and insect repellant. All hazardous materials would be used, transported, and disposed of in accordance with applicable regulations.

Construction of the proposed project would also generate hazardous waste that requires disposal. This would include the removal of chemically treated utility wood waste (e.g., wood poles and cross arms) from the existing 66-kilovolt (kV) subtransmission lines. Old transformers with the potential to release polychlorinated biphenyl (PCB)-containing oil and, petroleum hydrocarbons, and lead into the environment would also be removed and replaced at the upgraded Carpinteria,

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Casitas, and Santa Barbara Substations during construction. All treated utility wood waste would be repurposed or disposed of as hazardous waste by an approved SCE contractor, pursuant to SCE waste management and agency requirements. If disposal is required, the treated utility wood waste would be taken to a landfill with available capacity that is approved by the RWQCB or other relevant local authority for the disposal of treated wood/utility wood waste, and pursuant to SCE waste management and agency requirements. the Simi Valley Landfill, which is a solid waste facility approved by the Los Angeles RWQCB to accept treated wood waste (CalRecycle 2013). Other project-related hazardous solid waste requiring landfill disposal would be treated as follows: any bulk soil generated that meets RCRA or non-RCRA criteria for hazardous waste would be disposed of at the Clean Harbors Buttonwillow Landfill in Buttonwillow, California. Should bulk soil be generated that meets TSCA waste criteria, the bulk soil would be shipped to either Clean Harbors Grassy Mountain facility in Utah or the U.S. Ecology landfill in Beatty, Nevada. Non-bulk (drums) hazardous waste meeting RCRA, non-RCRA, and/or TSCA criteria for hazardous waste would be transported by an appropriately licensed hauler to the Clean Harbors, Los Angeles facility for disposal.

The applicant would comply with applicable laws and regulations regarding routine transport, use, or disposal of hazardous materials. In addition, APM GEN-1 would require that all staff receive Worker Environmental Awareness Training, which would include instruction regarding the individual responsibilities under the Clean Water Act, the project SWPPP, site-specific BMPs, and the location of Material Safety Data Sheets for the proposed project, as well as instructions to notify the foreman and regional spill response coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination, among other measures. Staff training would reduce the potential of the proposed project to create a significant hazard through the routine transport, use, and disposal of hazardous materials. Therefore, impacts under this criterion would be less than significant without mitigation.

2728 Operation

Operation and maintenance activities would be similar to those associated with the existing 66-kV subtransmission and substations. The newly installed transformers that would be used at the Carpinteria, Casitas, and Santa Clara Substations during project operations would use mineral oil (a highly refined hydrocarbon-based substance that is not considered a hazardous material flammable and is low in toxicity) for transformer insulation purposes and would not contain materials of concern (e.g., PCBs-or lead) that are typically found in oils used by old transformers. Therefore, installing the new transformers would reduce the risk of hazardous spills during operations. In accordance with applicable laws and regulations, SCE would update the SPCC Plans for the existing Carpinteria, Casitas, and Santa Clara Substation facilities to describe how hazardous materials released from electrical equipment would be diverted and directed toward containment structures and how contained hazardous materials would be stored within a temporary containment area with sufficient containment capacity. Additionally, the HMBP for the existing substation facilities would be updated to describe and identify storage areas for hazardous materials and waste; describe appropriate handling, storage, and disposal techniques; and include measures for avoiding and addressing spills. Operation of the project would comply with all applicable laws and regulations. Therefore, impacts associated with the routine use, transport, and disposal of hazardous materials during operation would be less than significant without mitigation.

 Impact HZ-2: 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.

LESS THAN SIGNIFICANT

The routine transport, use, and disposal of hazardous materials as described in Impact HZ-1 would be unlikely to result in accidental releases or spills, representing a potential hazard to the public during project construction and operations. As part of the proposed project, SCE would implement APM GEN-1, which requires that they provide Material Safety Data Sheets to project construction crews and SCE personnel for hazardous materials that would be present at the project construction site. In addition, all staff would undergo Worker Environmental Awareness Program (WEAP) Training that would include instructions in case of a spill or release of hazardous materials, and would comply with applicable laws and regulations regarding the use, transportation, and disposal of hazardous materials; therefore, impacts under this criterion would be less than significant impact without mitigation.

Operation and maintenance activities would be similar to those associated with the existing 66-kV subtransmission and substations. Operation of the upgraded substations would require the continued use of electrical transformers; however, as stated above, the newly installed transformers would use a low-toxicitynon-toxic substance for transformer insulation purposes. Therefore, installing the new transformers would reduce the risk of hazardous spills during operations. SCE would update the SPCC Plans for the existing Carpinteria, Casitas, and Santa Clara Substation facilities to describe how hazardous materials released from electrical equipment would be diverted and directed toward containment structures, and how contained hazardous materials would be stored within a temporary containment area with sufficient containment capacity. Additionally, the HMBP for the existing substation facilities would be updated to describe and identify storage areas for hazardous materials and waste; describe appropriate handling, storage, and disposal techniques; and include measures for avoiding and addressing spills. Therefore, impacts associated with the accidental release of hazardous materials during operation would be less than significant.

Impact HZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. LESS THAN SIGNIFICANT

Four schools are located within 0.25 miles of the proposed project components. Construction of the proposed project would involve the limited transport and use of hazardous liquids (e.g., gasoline, solvents, and lubricating fluids). These types of hazardous materials are commonly used during construction activities associated with commercial, residential, and industrial projects. Compliance with federal, state, and local regulations and implementation of APM GEN-1, would ensure that impacts under this criterion are less than significant without mitigation, as described in Impact HZ-1.

Diesel-powered vehicles and construction equipment would be used during construction of the proposed project. Diesel exhaust emissions are considered toxic emissions by the California Air Resources Board. Diesel exhaust would be emitted within 0.25 miles of schools in the vicinity of the project; however, because construction activities would be temporary and would not take place at any single location for an extended period, impacts due to diesel exhaust emissions would be less than significant without mitigation.

 Impact HZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

LESS THAN SIGNIFICANT WITH MITIGATION

As described in Section 4.8.1.1, the results of Cortese List (Government Code Section 65962.5) database searches did not identify any SWRCB Geotracker sites, solid waste disposal sites, sites with Cease and Desist Orders or Cleanup and Abatement Orders, or DTSC EnviroStor or hazardous material sites within 1,000 feet of components of the proposed project. Although search results of the databases that compose the Cortese List found no hazardous sites near the project, there is still the minor potential for an unrecorded hazardous site to be present on site. During construction activities, the applicant or its contractor may encounter subsurface structures, such as pipelines or unknown/undetected storage tanks, or materials resulting in a release of contaminants such as lead, asbestos, pesticides, or fuel that may be associated with past uses. The spread of discovered contaminant would result in a significant impact. MM HZ-1 would require the applicant to prepare and implement a Contaminated Soil/Groundwater Contingency Plan in case hazardous material is found on site. Implementation of MM HZ-1 would reduce the potential to spread contaminated soils or waters, which would reduce impacts to a less than significant level.

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

NO IMPACT

The proposed project would not be located within an airport land use plan or within 2 miles of a public airport. The alignment of the project and the terrain in the region would require FAA notification due to the height above ground of the conductor or telecommunication cable between towers. In accordance with regulations, the applicant would file FAA form 7460, Notice of Proposed Construction or Alteration for structures or lines as outlined in FAA Part 77 prior to construction. The FAA's response to form 7460 may identify conductor spans that would require marker balls and/or poles or towers that would require red lighting directed upwards and outwards toward potential aviation traffic. All FAA recommendations would be implemented into the design of the project. In compliance with FAA regulations, safety hazards would be avoided for people residing or working in the project area. Therefore, there would be no impact under this criterion.

Impact HZ-6: For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.

NO IMPACT

The proposed project would not be located within the vicinity of a private airstrip. As discussed under Impact HZ -5, above, the alignment of the project and the terrain in the region would require FAA notification due to the height above ground of the conductor or telecommunication cable between towers. In accordance with regulations, the applicant would file FAA form 7460 for structures or lines, as outlined in FAA Part 77, prior to construction. All FAA recommendations, as discussed under Impact HZ-6 above, would be implemented into the design of the project. Compliance with FAA regulations would avoid any safety hazards for people residing or working in the project area. Therefore, there would be no impact under this criterion.

 Impact HZ-7: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

LESS THAN SIGNIFICANT WITH MITIGATION

Construction

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The proposed project would require temporary or single-lane closure of several roadways during construction or maintenance activities; however, none of the road closures would occur along roads that have been identified as part of an emergency response or evacuation plan. All lane closures would use a traffic control service and would be conducted in accordance with local ordinances and city permit conditions. As further discussed in Section 4.15, "Traffic and Transportation." the applicant would implement MM TT-1, Traffic Control Plan, and MM TT-2, Commuter Plan, during project construction to minimize short-term construction-related impacts on local traffic, including emergency access. MM TT-1, Traffic Control Plan, would include measures consistent with those published in the California Joint Utility Traffic Control Manual (California Inter-Utility Coordinating Committee 2010) and the applicant to coordinate with local jurisdictions and emergency service providers prior to any road closures. MM TT-12, Commuter Plan would also require the applicant to develop a plan that includes a provision requiring for construction workers to park personal vehicles at approved staging areas and/or contractor staging vardsmeet at the SCE Ventura Service Center and Staging Yards 1 and 5 and carpool to the project site. As a result, travel routes for emergency vehicles would remain unobstructed and adequate during both construction and operation phases of the proposed project. Therefore, impacts to adopted emergency response plans or emergency evacuation plans would be less than significant.

Operations

Operation and maintenance activities associated with the project would be similar to those associated with the existing 66-kV subtransmission and substations. In the event that any operation or maintenance activity may cause a roadway blockage or closure, SCE would follow the same procedures described above (e.g., coordination with local jurisdictions and emergency responders, consistency with local ordinances, etc.) to avoid causing delays or restricting access. Impacts under this criterion during operation would be less than significant.

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In addition, implementation of the project is intended to increase the reliability of SCE's existing electrical system in the South Coast of Santa Barbara County service area during emergency conditions, while also enhancing operational flexibility. As a result, operation of the proposed project would improve the provision of electrical service during emergency situations, which could facilitate the implementation of emergency response plans.

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Impact HZ-8: 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.

LESS THAN SIGNIFICANT IMPACT WITH MITIGATION

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Construction

- Several of the proposed project components are located in areas that are designated by CALFIRE as
- Very High Fire Hazard Severity Zones (see Figure 4.8-1) due to flammable native vegetation, dry
- weather conditions, and high winds. Construction, operation, and maintenance activities associated
 with the proposed project would increase fire risk during refueling, vehicle and equipment use,
- 48 welding, vegetation clearing, worker cigarette smoking, and other activities. Fires could be started

when objects contact the subtransmission lines or other energized equipment, when a live-phase conductor falls to the ground, due to conductor-to-conductor contact, or due to power surges.

Additionally, the subtransmission line components of the proposed project would be consistent with California Public Resources Code Sections 4291 through 4299, which regulate vegetation management. Per these regulations, the applicant would maintain vegetation clearance areas around the substation and subtransmission lines. The proposed project would also be constructed consistent with CPUC GOs 95 and 165 regarding subtransmission line construction.

Construction activities of the proposed project would substantially increase fire risk regardless of vegetation clearing, and compliance with applicable laws, regulations, and standards. MM HZ-2 would require the applicant to develop a Fire Control and Emergency Response Plan. This plan would be developed in coordination with local fire departments and would identify fire prevention measures and response and communication protocols in the event of an emergency. Implementation of MM HZ-2 would reduce impacts associated with increased fire risk to less than significant levels.

Operation

Operation and maintenance activities would be similar to those associated with the existing 66-kV subtransmission and substations. The subtransmission lines and substations would continue to be maintained and inspected in accordance with California Public Resources Code Sections 4291 through 4299 and CPUC GOs 95 and 165. Operation activities associated with the proposed project would not significantly increase fire risk from the existing conditions.

Additionally, the 66-kV subtransmission line reconductoring and telecommunication route project components would involve the replacement of older infrastructure, such as wooden structures, conductor wire, and supporting structures, with new elements such as conductor wire and steel poles. Older electrical infrastructure components are more likely to sag and break, resulting in downed power line conditions, and thus represent a higher fire risk than newer poles and wire. Additionally, the reestablishment and improvement of access roads would improve access for emergency vehicles to rural areas. Because the proposed project would result in upgrades from older infrastructure along the 66-kV subtransmission line and telecommunications routes and to access roads, the proposed project would reduce the fire risk associated with these components.

4.8.4 Mitigation Measures

 MM HZ-1: Contaminated Soil/Groundwater Contingency Plan. The applicant will submit a Contaminated Soil/Groundwater Contingency Plan prior to start of construction to address unanticipated unearthing or exposure of buried hazardous materials or contamination or contaminated groundwater. The final Contaminated Soil/Groundwater Contingency Plan shall be implemented, as specified, throughout construction and restoration. This plan will detail steps that the applicant or its contractor will take to prevent the spread of contamination, the sampling necessary if contamination is discovered, and remedial action. At minimum, the plan will include the following:

1. Contact information and procedures for federal, regional, and local agencies; the applicant's environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater; and licensed disposal facilities and haulers.

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- 2. Procedures to minimize environmental impacts in the event that hazardous soils or other materials are encountered during construction, including stopping work; securing and marking the contaminated area; preventing the spread of contamination; testing; primary, secondary, and final cleanup procedures; and proper disposal in accordance with applicable laws and regulations.
- 3. Training requirements for construction workers performing excavation activities and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor).
- **MM HZ-2: Fire Control and Emergency Response Plan.** Prior to construction, the applicant will develop and implement a Fire Control and Emergency Response Plan. The final Fire Control and Emergency Response Plan shall be implemented, as specified, throughout construction and restoration. This plan, and a record of contact and coordination with local fire departments, will be submitted to the CPUC for review and approval prior to construction of the proposed project. The plan will describe fire prevention and response practices that the applicant will implement during construction and operation of the proposed project to minimize the risk of fire and, in the case of fire, provide for immediate suppression and notification. The plan will include:
 - Fire prevention and response practices regarding the dispensing and storage of gasoline, diesel, and other fuels and combustible chemicals; power tool and equipment use; emergency access; fire suppression equipment and training; electrical grounding; and vegetation clearing; and
 - Communication protocols for on-site workers to coordinate with local agencies and emergency personnel and for the applicant's environmental health and safety personnel to coordinate with on-site workers in the event of fire, flood, or other emergencies or increased risk of emergency during construction or operation of the project.

The plan will define requirements for:

- Contacting CALFIRE at least two days prior to periods during which helicopters would be
 used to provide radio frequencies to be used by the helicopters; helicopter identifier data; and
 information about the number of helicopters to be used, dates of helicopter use, helicopter
 flight patterns, construction areas where helicopters would be used, and fueling and landing
 areas:
- Designating on-site fire patrol personnel who will monitor fire prevention activities during construction and have full authority to stop construction to prevent fire hazards;
- Reviewing the Fire Control and Emergency Response Plan with designated on-site fire patrol personnel and all other workers prior to commencing construction at each project area;
- Confining welding or blow torch activities to cleared areas having a minimum radius of 10 feet, measured from place of welding. If welding or blow torch activities occur within the right-of-way of the transmission or subtransmission line within High or Very High Fire Hazard Severity Zones as defined by CALFIRE, a fire patrol person will observe the operation;
- Prohibiting smoking at all work areas within High and Very High Fire Hazard Severity Zones as defined by CALFIRE during construction and operation of the project;
- Ensuring that all vehicles used for construction and operation of the project carry fire suppression equipment;

• The use of spark arrestors;

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- Furnishing tools (e.g., shovels), equipment (e.g., fire extinguishers), and materials necessary to prevent fires, control the spread of fire if started, and providing assistance to extinguish fires started as a result of construction of the project;
- Providing the applicant's workforce and equipment to extinguish uncontrolled fire near project work areas as directed by the USFS, CALFIRE, or local fire department representatives; and
- Ceasing any or all work activities, including helicopter use, as directed by the USFS, CALFIRE, or local fire department representatives in response to fire incidents.

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