B.3.8 Hazards and Hazardous Materials

HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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 one-quarter mile 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 two 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?	☐	☐	☒	☐
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?	☐	☒	☐	☐
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?	☐	☒	☐	☐

Significance criteria established by CEQA Guidelines, Appendix G.

B.3.8.1 Setting

This section addresses issues related to environmental hazards and hazardous materials in the existing conditions. Environmental hazards include accidental spills of hazardous materials, the presence of existing subsurface contamination, the risk of wildfire, and aircraft safety. Hazardous materials include fuel, oil, and lubricants. If encountered, contaminated soil can pose a health and safety threat to workers or the public.

Land Use

Existing and past land use activities are commonly used as indicators of sites or areas with potential for hazardous material storage and use or potential environmental contamination. For example, many industrial sites, historic and current, have soil or groundwater contamination by hazardous substances. Other hazardous materials sources include leaking underground tanks in commercial and rural areas, contaminated surface runoff from polluted sites, and contaminated groundwater plumes.

The Proposed Project is located in the Indian Wells Valley and Searles Valley of the northern Mojave Desert. Components of the Project are located in northeastern Kern County and northwestern San

Bernardino County and pass through the city of Ridgecrest and the unincorporated communities of Inyokern, China Lake Acres, Argus, and Trona. Most of the land traversed by the Inyokern-McGen-Searles No. 1 and No. 2 115-kV subtransmission lines is undeveloped open desert or sparsely developed rural residential. The Inyokern-McGen-Searles No. 1 transmission line crosses along the northern edge of China Lake Acres where land uses consist of a mix of rural residential and commercial and through the approximate center of the city of Ridgecrest where land uses are primarily a mix of residential and commercial. The northeastern end of both transmission lines pass through the small community of Argus where there is a mix of residential and commercial (primarily gas stations) land uses. The Inyokern Substation is located on the outskirts of Inyokern and the immediate area surrounding the substation is undeveloped desert. The Downs Substation and the Ridgecrest Service Center are located in the city of Ridgecrest in areas with mixed residential and commercial land uses. The Searles Substation is located in an area of undeveloped desert on the western edge of Searles Valley, west of State Route (SR) 178 and approximately 0.35 miles southwest of the Searles Valley Minerals Westend Plant. The McGen Substation is located southwest of the community of Trona, and is adjacent to the Argus Cogeneration Plant, which is a coal-fired power station that provides power for operations of the Searles Valley Minerals plants and processing facilities.

Hazardous Materials

During construction, hazardous materials such as cleaning solvents, paints, adhesives, vehicle fuels, oil, hydraulic fluid, and other vehicle and equipment maintenance fluids would be used and stored in construction staging yards. Spills and leaks of hazardous materials during construction activities could result in soil or groundwater contamination. As stated in SCE's Preliminary Environmental Assessment (PEA), all hazardous materials would be stored, handled, and used in accordance with applicable regulations, Material Safety Data Sheets (MSDS) would be made available to all crew workers at the construction site, and the Stormwater Pollution Prevention Plan (SWPPP) prepared for the Proposed Project would provide the locations for storage of hazardous materials during construction, as well as protective measures, notifications, and cleanup requirements for incidental spills or other potential releases of hazardous materials (SCE, 2010). No acutely hazardous materials would be stored or used at the Project sites during the construction or operation of the proposed Downs Substation expansion, the proposed new 115-kV subtransmission line segments to loop the existing Inyokern-McGen-Searles No. 2 115-kV subtransmission line through the substation, the replacement of six subtransmission poles, or installation of fiber optic telecommunication cable.

The expanded Downs Substation would include three 28 MVA, 115/12 kV transformers which would contain non-toxic mineral oil used as a coolant. The existing two 33/12 kV, 22.4 MVA transformers and one spare 33/12 kV, 14 MVA transformer would be removed as part of the proposed upgrades. As part of the Proposed Project, a Spill Prevention Control and Countermeasure (SPCC) Plan would be required due to the planned operation of the oil-filled transformers (in accordance with 40 Code of Federal Regulations [CFR] Part 112.1 through Part 112.7). Typical SPCC features include curbs and berms designed and installed to contain spills should they occur. These features would be part of SCE's final engineering design for the Proposed Project (SCE, 2010).

Environmental Contamination

Components of the Proposed Project where ground disturbance would occur would be susceptible to encountering environmental contamination, if located in the vicinity of commercial or industrial sites with known contamination or adjacent to sites that store and use large quantities of hazardous materials. Ground disturbing activities for the Proposed Project are as follows:

- Grading, trenching, and excavation at and adjacent to the existing Downs Substation for construction and installation of the new expanded substation facilities and equipment and the new wood stub poles (2) and steel poles (2 LWS and 5 TSP).
- Trenching for installation of underground substructures for the new fiber optic telecommunications at the Inyokern Substation (1,000 ft), Downs Substation (375 feet), Searles Substation (1,545 feet), McGen Substation (1,526 feet), and the Ridgecrest Service Center (1,580 feet).
- Excavation for six replacement wood poles, two wood stub poles (one new and one replaced) and associated guying and anchors along the Inyokern-McGen-Searles No. 1 115-kV subtransmission line in the Searles Valley along SR 178.

A Phase I and Limited Phase II Environmental Site Assessment (ESA) was conducted for the Proposed Downs Substation expansion site and for the associated proposed new 115-kV subtransmission line segment by Ninyo & Moore in July 2010 (SCE, 2010). The ESA indicates that the expansion site for the Downs Substation has been vacant undeveloped land since at least 1952. The location was owned by chemical corporations between 1955 and 1986; however, based on interviews Ninyo & Moore conducted with a longtime city of Ridgecrest employee with over 47 years of knowledge regarding properties in Ridgecrest, the proposed Downs Substation expansion site (including the proposed new 115-kV subtransmission line segment) and the adjacent ball field to the south were never known to be used by the chemical corporations for chemical manufacture or storage. Ninyo & Moore conclude that based on the historical use and current use of the location (i.e., vacant land), there are no indications that hazardous waste has been generated or stored at the proposed Downs Substation expansion site (including the proposed new 115-kV subtransmission line segment) (SCE, 2010).

During Ninyo & Moore's site reconnaissance a soil stockpile located at the southwestern portion of the Downs Substation expansion site was noted, and two soil samples were collected to evaluate the suspected potential presence of chemicals or petroleum products due to the unknown origin of the soil stockpile. Evidence of stains or odors in the soil samples was not noted. The two samples were analyzed for Title 22 Metals, volatile organic compounds (VOCs), total petroleum hydrocarbons (TPH), TPH as mineral oil, organochlorine pesticides (OCPs), chlorinated herbicides, and polychlorinated biphenyls (PCBs). No TPH, TPH as mineral oil, chlorinated herbicides, OCPs, PCBs, or VOCs were detected in the soil samples. Ten of the seventeen Title 22 Metals were detected above detection limits in the samples; however, the concentrations of these ten metals detected in the soil samples are considered within background ranges of native soils in the region, with possible exception of slightly elevated concentrations of arsenic (SCE, 2010). Ninyo & Moore conclude that since the metal concentrations were below their respective U.S. Environmental Protection Agency (EPA) Region 9 Regional Screening Levels (RSLs) and California Human Health Screening Levels (CHHSLs) for soil at residential sites (with the exception of arsenic), the soil does not pose an environmental concern. The slightly elevated concentration of arsenic detected in the soil samples exceed the residential RSL and CHHSL; however, it did not exceed the range of arsenic found in southern California native soils. Therefore, arsenic is not expected to pose a significant health risk at the Downs Substation expansion site (SCE, 2010). None of the reported detections of analytes exceed State or federal criteria for hazardous waste.

Ninyo & Moore also reviewed an environmental information database search by FirstSearch and the State Water Resources Control Board's (SWRCB) GeoTracker website for properties of potential environmental concern related to the Downs Substation expansion site and associated new 115-kV subtransmission line segment. One Solid Waste Landfill (SWL) site, two leaking underground storage tank (LUST) sites, one underground storage tank (UST) site, and one Department of Toxic Substance

Control (DTSC) Hazardous Waste Tracking System (HWTS) site were identified. The SWL site was listed as an unpermitted waste tire location with approximately 100 waste tires in 2001, and is located approximately 0.40 mile northeast of the Downs Substation expansion site. Ninyo & Moore conclude that based on its distance from the site and the fact that groundwater in the area is at greater than 100 feet depth, it is unlikely that this site could have resulted in negative environmental impact at the Downs Substation expansion site. The two identified LUST sites were both "Case Closed" and thus have no potential to impact the Proposed Project. The UST site associated with the Mini Stop located approximately 0.1 miles northeast of the Downs Substation expansion site is not known to have any environmental issues and due to the greater than 100 foot depth to groundwater is not likely to have resulted in negative environmental impact at the Downs Substation expansion site.

The closest site identified by Ninyo & Moore is the DTSC HWTS site, Mather Bros Inc., located approximately 400 feet to the east of proposed Downs Substation expansion site. The Mather Bros Inc. site was identified as a HWTS permit holder for generation of hazardous waste at their facility from 1993 until 2008, however, database information indicates that hazardous waste was not generated at the facility. Based on the lack of generated hazardous waste, Ninyo & Moore conclude that it is unlikely that the facility would have resulted in negative impact to the environmental integrity of the Downs Substation expansion site.

A review of the SWRCB's GeoTracker website was conducted by Geotechnical Consultants, Inc. in May 2011 for all other components of the Proposed Project where ground disturbing activities such as excavation or trenching would occur. Four GeoTracker site listings were identified within 0.25-miles of the trenching locations for the underground segment of the fiber optic cable in the city of Ridgecrest and are listed below in Table B.3.8-1.

Table B.3.8-1. GeoTracker Sites within 0.25-miles of Proposed Project Components with Ground Disturbance

Site Name	Address	Listing Type	Closest Project Component(s)	Distance (feet)
Ridgecrest Service Center	510 S China Lake Blvd., Ridgecrest	Case Closed LUST	Underground fiber optic at the Ridgecrest Service Center	0
Verizon Calif – Ridgecrest	520 S China Lake Blvd., Ridgecrest	UST	Underground fiber optic installed under Lenore St.	400 feet east
Fastrip #3	345 S China Lake Blvd., Ridgecrest	UST	Underground fiber optic installed under Lenore St.	400 feet east
Ridgecrest Carwash	141 S China Lake Blvd., Ridgecrest	Case Closed LUST	Underground fiber optic to be installed under the corner of Lenore St. and E. Church Ave	890 feet northwest

Source: SWRCB, GeoTracker website, May 2011.
Acronyms: LUST = leaking underground storage tank; UST=underground storage tank.

None of these sites poses any potential risk for contamination to the Proposed Project due to the fact that both LUST cases are case closed and neither of the UST sites has any known contamination issues.

Schools

Although there are numerous schools in the Ridgecrest area and several in the Trona area, only four schools are located within 0.25-miles of the Proposed Project. The schools and their approximate distance from Project components are listed below:

- Pilgrim Christian School, 1305 W Ridgecrest Blvd., Ridgecrest – located south of and adjacent to the Inyokern-McGen-Searles No. 2 115-kV subtransmission line on which the fiber optic telecommunication cable would be installed.
- Ridgecrest Charter School, 325 Downs Street, Ridgecrest – located approximately 300 feet south of the Inyokern-McGen-Searles No. 2 115-kV subtransmission line on which the fiber optic telecommunication cable would be installed and approximately 1,200 feet south of the Downs Substation expansion site.
- Saint Ann's Catholic School, 446 West Church Ave, Ridgecrest – located north of across the street from the Inyokern-McGen-Searles No. 2 115-kV subtransmission line on which the fiber optic telecommunication cable would be installed.
- James Monroe Middle School, 340 West Church Ave., Ridgecrest - located north of and across the street from the Inyokern-McGen-Searles No. 2 115-kV subtransmission line on which the fiber optic telecommunication cable would be installed.

Airports and Airstrips

There are several airstrips/airports and heliports within the vicinity of the Proposed Project, including one public airport, one private airport, a military airbase, and two heliports. The public airport is the Inyokern Airport, which at its closest point to the Proposed Project is located approximately 1.6 miles west of the Inyokern Substation and the west end of the Inyokern-McGen-Searles No. 1 and No. 2 115-kV subtransmission lines. The Inyokern Airport runways are oriented in a general north-south direction and planes would not directly cross the Project alignments during landing and taking off. A small, privately owned airstrip utilized by ultralights and gliders is located approximately 0.10 mile south of the Inyokern-McGen-Searles No. 1 and 1.90 miles south of the Inyokern-McGen-Searles No. 2 115-kV subtransmission lines. The grass/sod runway for this facility is subparallel to the Inyokern-McGen-Searles No. 1 115-kV subtransmission line, trending toward the alignment in a northeast-southwest direction. Armitage Field at the China Lake Naval Air Weapons Station (CLNAWS) has three runways which are located approximately 3.5 miles north of the existing Downs Substation and 1.9 miles north of the closest point of the Inyokern-McGen-Searles No. 2 115-kV subtransmission line. The two heliports located within the vicinity of the Proposed Project are at the Ridgecrest Community Hospital, approximately 1.4 miles northeast of the existing Downs Substation and the SCE-owned heliport located on the eastern side of the Ridgecrest Service Center property.

Wildland Fires

The Proposed Project passes through areas of desert with sparse to no vegetation, low density residential areas, and residential and commercial properties of the city of Ridgecrest. Fire protection in the Proposed Project area is provided by the Kern County Fire Department and San Bernardino County Fire Department. Naturally occurring wildfires and grassfires are rare due to the sparse vegetation in the area; fires that do occur are generally due to tumbleweeds that have not been controlled and trash accumulation (City of Ridgecrest, 2008). According to the California Department of Forestry and Fire Prevention (CDF) Fire Hazard Severity Maps for Kern and San Bernardino Counties (CDF, 2011a), the

Project alignments and facilities are in areas defined as "Moderate Fire Hazard[2]", "Non-wildland fuels (e.g. rock, agriculture, water)[3]", and "Urbanized/developed areas outside of hazard zones[4]". Also, according to the CDF Natural Hazard Disclosure (Fire) maps for Kern and San Bernardino Counties, there are no areas near the Proposed Project that are defined as a "Wildland Area That May Contain Substantial Forest Fire Risks and Hazards" or as "Very High Fire Hazard Severity Zone - AB 337" (CDF, 2011b).

Electromagnetic Fields

Electric voltage and electric current from transmission lines create electromagnetic fields (EMF). Possible health effects associated with exposure to EMF have been the subject of scientific investigation since the 1970s, and there continues to be public concern about the health effects of EMF exposure. However, EMF is not addressed here as an environmental impact under CEQA. The CPUC has repeatedly recognized that EMF is not an environmental impact to be analyzed in the context of CEQA because (1) there is no agreement among scientists that EMF does create a potential health risk, and (2) there are no defined or adopted CEQA standards for defining health risks from EMF.

Applicable Regulations

Hazardous substances are defined by federal and State regulations that aim to protect public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous. Hazardous substances are defined in the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 101(14), and also in the California Code of Regulations (CCR), Title 22, Chapter 11, Article 2, Section ~~66261~~66260 et seq.~~, which provides the following definition:~~

~~A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed.~~

For this analysis, soil that is excavated from a site containing hazardous materials would be considered to be a hazardous waste if it exceeded specific CCR Title 22 criteria or criteria defined in CERCLA or other relevant federal regulations. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials occurs; it may also be required if certain other activities occur. Even if soils or groundwater at a contaminated site do not have the characteristics required to be defined as hazardous wastes, remediation of the site may be required by regulatory

[2] Moderate Fire Hazard – Either wildland areas supporting areas of typically low fire frequency and relatively modest fire behavior due to factors including a relatively short active fire season, low incidence of past large and damaging fires, and dominant climax fuel types supporting modest surface fire regimes or developed/ urbanized areas with a very high density of non-burnable surfaces including roadways, irrigated lawn/parks, and low total vegetation cover (<30%) that is highly fragmented and low in flammability (e.g., irrigated, manicured, managed vegetation).

[3] Non-wildland fuels – Areas outside State Responsibility Areas (SRA) that are not classified as developed/urban or as a wildland zone, and are typically associated with nonflammable conditions: water, agricultural lands (excluding rangelands) and barren/rock areas. Similar areas within SRA are recoded to the Moderate class per State statute.

[4] Urbanized/developed areas – Developed areas spatially removed from proximity to wildland fire areas. Urban centers such as city centers ranging from 200 ft to ¾ miles way from wildland zones, where the critical distance allowing for this classification is dependent on the nature of the fire hazards in those wildland areas.

agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking lead jurisdiction.

Federal. The federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA.

CERCLA, including the Superfund program, was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

State of California. The California Environmental Protection Agency (Cal/EPA) was created in 1991, which unified California's environmental authority in a single cabinet-level agency and brought the Air Resources Board (ARB), SWRCB, Regional Water Quality Control Boards (RWQCBs), Integrated Waste Management Board (IWMB), DTSC, Office of Environmental Health Hazard Assessment (OEHHA), and Department of Pesticide Regulation (DPR) under one agency. These agencies were placed within the Cal/EPA "umbrella" for the protection of human health and the environment and to ensure the coordinated deployment of State resources. Their mission is to restore, protect and enhance the environment, to ensure public health, environmental quality, and economic vitality.

The California Hazardous Waste Control Law (HWCL) is administered by Cal/EPA to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, ~~until the EPA approves the California program,~~ both the State and federal laws apply in California. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous; establishes criteria for identifying, packaging and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal and transportation; and identifies some wastes that cannot be disposed of in landfills.

DTSC is a department of Cal/EPA and is the primary agency in California that regulates hazardous waste, cleans-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code. Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337-340). The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

Kern County. The County of Kern Environmental Health Services Department, Hazardous and Solid Waste Division, oversees businesses generating, storing, and transporting hazardous waste to protect the public health and the environment. The Division provides surveillance and enforcement for hazardous waste, radiological health, vector control, solid waste, and infectious waste. The program also provides emergency response to chemical events to furnish substance identification; health and environmental risk assessment; air, soil, water and waste sample collection; incident mitigation and cleanup feasibility options; and on-scene coordination for State superfund incidents. The program also provides for the oversight, investigation, and remediation of unauthorized releases from underground tanks.

San Bernardino County. The San Bernardino County Fire Department, Hazardous Materials Division, is the certified unified program agency responsible for administering the hazardous materials program within San Bernardino County.

B.3.8.2 Environmental Impacts and Mitigation Measures

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

LESS THAN SIGNIFICANT. Construction activities associated with the Proposed Project, including the proposed Downs Substation expansion, the proposed new 115-kV subtransmission line segment, the replacement of six subtransmission poles, and the installation of the new fiber optic telecommunication cable, would not use any acutely hazardous materials nor would any be stored on location or at staging yards during construction. Hazardous materials to be used during the construction of the Proposed Project would include gasoline, diesel fuel, oil, and lubricants associated with construction equipment and other vehicles. These hazardous materials would be transported, used, and disposed of in accordance with applicable rules, regulations, and SCE standard protocols designed to protect the environment, workers, and the public (SCE, 2010). Minor spills or releases of hazardous materials could occur due to improper handling and/or storage practices during construction activities. These potential impacts would be avoided through implementation of a site-specific Construction (SWPPP and training construction personnel in the handling and storage of hazardous materials. The SWPPP prepared for the Proposed Project would provide the locations for storage of hazardous materials during construction, as well as protective measures, notifications, and cleanup requirements for an incidental spills or other potential releases of hazardous materials (SCE, 2010). In addition, MSDS for any hazardous material to be used for the Project would be made available to all crew workers at the construction site(s) (SCE, 2010).

Operation and maintenance of the expanded Downs Substation, associated new 115-kV subtransmission line segment, and new fiber optic telecommunications cable would involve periodic and routine transport, use, and disposal of minor amounts of low toxicity hazardous materials consisting primarily of mineral oil and petroleum products (lubricating and insulating oils). The proposed expanded Downs Substation would be required to complete a SPCC Plan due to the planned operation of the oil-filled transformers, with typical SPCC features including curbs and berms designed and installed to contain spills should they occur (SCE, 2010). Proper handling and disposal of these materials in accordance with applicable rules, regulations, and SCE standard protocols (SCE, 2010) would avoid any significant hazards to the public or the environment, which would minimize the impact of use of these materials. Additionally, as required by Cal/OSHA, SCE would make sure that personnel handling any hazardous materials are trained to understand the hazards associated with these materials and would be instructed in the proper methods for storing, handling, and using these hazardous materials (SCE, 2010).

With implementation of the required SPCC, SWPPP, required personnel training, and use of no acutely toxic hazardous materials during construction and operation of the Proposed Project this impact would be less than significant.

b. Would the project 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. Implementation of the required SPCC, SWPPP, and personnel training for construction and operation of the Proposed Project, as discussed above in Section B.3.8.2(a), for spill prevention and hazardous substance control would reduce the potential impact from upset or accidental spills of hazardous materials to a less-than-significant level.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

LESS THAN SIGNIFICANT. Hazardous materials to be used during the construction and operation of the Proposed Project would consist of low toxicity materials including gasoline, diesel fuel, oil, and lubricants associated with construction equipment and vehicles. These low toxicity materials would be used throughout the Proposed Project area. While there are four schools located within 0.25 mile of the Inyokern-McGen-Searles No. 2 115-kV subtransmission line and/or Downs Substation expansion site, the low toxicity of the materials associated with the Proposed Project and proper handling, storage, and disposal of all hazardous materials in accordance with applicable regulations would reduce impacts to area schools to a less-than-significant level.

d. Would the project 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 it create a significant hazard to the public or the environment?

LESS THAN SIGNIFICANT. No component of the Proposed Project is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Please note that ~~M~~most of the Proposed Project crosses through undeveloped desert and no known contaminated sites exist within 0.25-miles of any of the Proposed Project components. However, portions of the Proposed Project, where ground disturbance would be required (trenching for the fiber optic telecommunications cable and excavations for the Downs Substation expansion and associated new 115-kV subtransmission segment), cross through commercial and industrial areas with gas stations and other facilities that use and store hazardous materials, including in the city of Ridgecrest and in the community of Trona near the McGen Substation. These areas could have previously unknown soil contamination in areas of anticipated ground disturbance. In the event that previously unknown contaminated soil is encountered during excavation activities, the SCE contractors would segregate the soil and sampling and testing would be done to determine appropriate treatment and disposal options. If the soil is classified as hazardous, it would be properly managed on-location and transported in accordance with U.S. Department of Transportation regulations utilizing a Uniform Hazardous Waste Manifest to a Class I Landfill or other appropriate soil treatment or recycling facility (SCE, 2010). The lack of known contaminated sites within 0.25-miles of any of the Proposed Project components and SCE's above plans related to encountering unknown soil contamination reduces the potential to less than significant for this impact.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two 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?

LESS THAN SIGNIFICANT. Some components of the Proposed Project are located within 2 miles of a public airport or public use airport. The Inyokern Airport, which at its closest point to the Project, is located approximately 1.6 miles west of the Inyokern Substation and the west end of the Inyokern-McGen-Searles No. 1 and No. 2 115-kV subtransmission lines. The Inyokern Airport runways are oriented in a general north-south direction and planes would not directly cross the Project alignments during landing and taking off. The proposed construction activities in the vicinity of the Inyokern Airport airstrip would be limited to the installation of fiber optic telecommunication cable on existing 115-kV subtransmission line poles and trenching to connect the cable to substation facilities. These construction activities would be conducted along an existing transmission corridor and would not alter the current physical alignment or height of the transmission poles and would not therefore present a safety hazard for people residing or working in the Project area near the Inyokern Airport, resulting in a less-than-significant impact.

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?

LESS THAN SIGNIFICANT. A small, privately owned airstrip utilized by ultralights and gliders is located approximately 0.10 mile south of the Inyokern-McGen-Searles No. 1 and 1.90 miles south of the Inyokern-McGen-Searles No. 2 115-kV subtransmission lines. The grass/sod runway for this facility is subparallel to the Inyokern-McGen-Searles No. 1 115-kV subtransmission line, trending toward/away from the alignment in a northeast-southwest direction. The proposed construction activities in the vicinity of the airstrip would be limited to the installation of fiber optic telecommunication cable on existing 115-kV subtransmission line poles. These construction activities would be conducted along the existing transmission corridor and would not alter the current physical alignment or height of the transmission poles and would not therefore present a safety hazard for people residing or working in the project area near the airstrip, resulting in a less-than-significant impact.

g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. SCE has indicated that no roads would be closed to emergency vehicles during the construction phase of the Proposed Project (SCE, 2010). To ensure access for emergency vehicles into the Project site and through any construction-related temporary travel lane closures or disruptions, and reduce construction impacts to a less-than-significant level, Mitigation Measure T-1 (Prepare Construction Traffic Control Plan and Implementation Program) would be implemented (see Section B.3.16.2(a)). Operation and maintenance of the Proposed Project would not increase demands on existing emergency response services as discussed in Section B.3.14.2 (a) and (b), and would therefore have no impact on adopted emergency response plans or emergency evacuation plans.

Mitigation Measure for Emergency Response

T-1 Prepare Construction Traffic Control Plan and Implementation Program (See Section B.3-16)

h. Would the project 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 WITH MITIGATION INCORPORATED. Outside of the city of Ridgecrest, the Proposed Project components are located in areas of desert with sparse to no vegetation, and low density residential areas. Potential wildland fire hazard would be low at construction sites due to the limited fuel load present. Additionally, these areas are not mapped in areas designated as "Wildland Area That May Contain Substantial Forest Fire Risks and Hazards" or as "Very High Fire Hazard Severity Zone - AB 337" by the California Department of Forestry and Fire Prevention (CDF, 2011b).

In order to further reduce the low potential for wildland fire at Proposed Project components during construction and operation, SCE plans to implement standard fire-prevention protocols when the National Weather Service issues a Red Flag Warning. These protocols include measures to address smoking and fire rules, storage and parking areas, use of gasoline-powered tools, use of spark arresters on construction equipment, road closures, use of a fire guard, fire suppression tools, fire suppression equipment, and training requirements (SCE, 2010). As a result of the already low wildfire risk due to limited fuel sources and with implementation of Mitigation Measure HZ-1, which would require preparation and implementation of a Fire management Plan, construction and operation of the Proposed Project would have a less-than-significant impact to risk of loss, injury or death involving wildland fires.

Mitigation Measure for Wildland Fires

HZ-1 **Prepare and implement Fire Management Plan.** SCE shall prepare and implement a project specific Fire Management Plan which outlines guidance for prevention, control, and extinguishment of fires during construction and maintenance activities for the Project. The Fire Management Plan shall include provisions applicable to construction crews and activities and maintenance crews and activities. The Fire Management Plan shall include protocols to address smoking and fire rules, storage and parking areas, use of gasoline-powered tools, use of spark arresters on construction equipment, road closures, use of a fire guard, fire suppression tools, fire suppression equipment, and training requirements. Additionally the Plan shall include the following measures:

- Cease work during Red Flag Warning events. During Red Flag Warning events, as issued daily by the National Weather Service in State Responsibility Areas (SRA) and Local Responsibility Areas (LRA), all non-emergency construction and maintenance activities shall cease in affected areas.
- Ensure open communication pathways. All construction crews and inspectors shall be provided with radio and cellular telephone access that is operational along the entire Project alignment to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the Project area immediately upon ignition.
- Remove hazards from work areas. SCE shall clear dead and decaying vegetation from the work area prior to starting construction and/or maintenance work. The work areas would include only those areas where personnel are active or where equipment is in use or stored, and may include: the Downs Substation expansion area and associated new fiber optic and transmission equipment; the new fiber optic telecommunications route;

portions of the 115 kV subtransmission ROW in Searles Valley with new poles; construction laydown areas; pull, tension, and splicing sites; access roads; parking pads; and any other sites adjacent to Project components where personnel are active or where equipment is in use or stored. Cleared dead and decaying vegetation shall either be removed or chipped and spread on site in piles no higher than six (6) inches.