

4.9 Hazards and Hazardous Materials

4.9.1 Introduction

This section presents the environmental setting and potential impacts related to hazards and hazardous materials that may occur from the Proposed Project, reasonably foreseeable distribution components, and alternatives. Hazardous materials are chemical and non-chemical substances that can pose a threat to the environment or human health if misused or released. Hazardous materials occur in various forms and can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazardous materials can include explosives, flammable and combustible substances, poisons, radioactive materials, pesticides, petroleum products, and other materials defined as hazardous under the Resource Conservation and Recovery Act of 1976 (RCRA) in 40 CFR 261.

Potential impacts from the Proposed Project, reasonably foreseeable distribution components, and alternatives are evaluated in light of existing laws and regulations governing hazards and hazardous materials and the existing physical environmental setting.

4.9.2 Regulatory Setting

Hazardous materials are regulated by numerous agencies whose jurisdictions and responsibilities sometimes overlap. Federal agencies that regulate hazardous materials include the USEPA and the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA). At the state level, agencies such as the California Department of Industrial Relations, California Occupational Safety and Health Administration (Cal/OSHA), and the California Emergency Management Agency (Cal EMA) govern the use of hazardous materials. State and local agencies have either parallel or more stringent rules than federal agencies.

Federal Laws, Regulations, and Policies

Resource Conservation and Recovery Act

RCRA (42 USC Section 6901 et seq.), as amended by the Hazardous and Solid Waste Amendments of 1984, is the primary federal law for the regulation of solid waste and hazardous waste in the United States. RCRA provides for the “cradle-to-grave” regulation of hazardous wastes, including generation, transport, treatment, storage, and disposal. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed.

The USEPA has primary responsibility for implementing RCRA, but individual states are encouraged to seek authorization to implement some or all RCRA provisions. California received authority to implement the RCRA program in August 1992. The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program in addition to California’s own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, also called the Superfund Act; 42 USC Section 9601 et seq.) is intended to protect the public and the environment from the effects of past hazardous waste disposal activities and new hazardous material spills. Under CERCLA, the USEPA has the authority to seek the parties responsible for hazardous materials releases and to ensure their cooperation in site remediation. CERCLA also provides federal funding (through the “Superfund”) for the remediation of hazardous materials contamination. The Superfund Amendments and Reauthorization Act of 1986 (Public Law 99-499) amended some provisions of CERCLA and provided for a Community Right-to-Know program.

Spill Prevention, Control, and Countermeasure Rule

The USEPA’s Spill Prevention, Control, and Countermeasure (SPCC) Rule (40 CFR Part 112) applies to facilities with a single above-ground storage tank (AST) with a storage capacity greater than 660 gallons, or multiple tanks with a combined capacity greater than 1,320 gallons. The rule includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement SPCC Plans. The SPCC rule applies to oil-filled equipment, including transformers that store in excess of the threshold quantities of oil described above.

Occupational Safety and Health Administration

OSHA is responsible at the federal level for ensuring worker safety. OSHA sets federal standards for implementation of workplace training, exposure limits, and safety procedures for the handling of hazardous substances (as well as other hazards). These standards, codified in 29 CFR Part 1910, address issues that range in scope from walking and working surfaces, to exit routes and emergency planning, to hazardous materials and personal protective equipment (PPE). They include exposure limits for a wide range of specific hazardous materials, as well as requirements that employers provide PPE to their employees wherever it is necessary (29 CFR Section 1910.132).

Federal Aviation Administration Regulations

The FAA regulates aviation at regional, public, private, and military airports. Navigable airspace regulations at 14 CFR Part 77 establish the standards for determining obstructions in navigable airspace. The FAA issues the airspace hazard determinations using FAA Form 7460. In addition, 14 CFR Part 133 establishes helicopter loading regulations.

State Laws, Regulations, and Policies

Safe Drinking Water and Toxic Enforcement Act of 1986 – Proposition 65

The Safe Drinking Water and Toxic Enforcement Act of 1986, more commonly known as Proposition 65, protects the State’s drinking water sources from contamination with chemicals known to cause cancer, birth defects, or other reproductive harm. Proposition 65 also requires businesses to inform the public about exposure to such chemicals in the products they purchase, in their homes or workplaces, or that are released into the environment. In

accordance with Proposition 65, the California Governor's Office publishes, at least annually, a list of such chemicals. The Office of Environmental Health Hazard Assessment (OEHHA), an agency under the California Environmental Protection Agency (CalEPA), is the lead agency for implementation of the Proposition 65 program. Proposition 65 is enforced through the California Attorney General's Office; however, district and city attorneys and any individual acting in the public interest may also file a lawsuit against a business alleged to be in violation of Proposition 65 regulations.

California Public Utilities Commission General Order 95: Rules for Overhead Electric Line Construction

The CPUC's G.O. 95 specifies requirements for overhead transmission line design, construction, and maintenance, including a number of requirements to avoid or minimize potential safety hazards. These requirements include standards related to vegetation management and maintenance of minimum vegetation clearances from high-voltage lines to minimize potential fire hazard.

Fire Prevention Standards for Electric Utilities

The Fire Prevention Standards for Electric Utilities (14 CCR 1250-1258) provide definitions, maps, specifications, and clearance standards for projects under the jurisdiction of PRC Sections 4292 and 4293 in State Fire Responsibility Areas (SRAs).

Hazardous Materials Business Plans

Hazardous materials business plans (HMBPs) are required for businesses that handle hazardous materials in quantities equal to or greater than 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity (40 CFR Part 355, Appendix A) (Cal OES 2014). HMBPs are required to include an inventory of the hazardous materials used/stored by the business, a site map, an emergency plan, and a training program for employees. In addition, business plan information is provided electronically to a statewide information management system, verified by the applicable Certified Unified Program Agency (CUPA), and transmitted to agencies responsible for the protection of public health and safety (i.e., local fire department, hazardous material response team, and local environmental regulatory groups).

California Occupational Safety and Health Administration

Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations in California. Cal/OSHA regulations pertaining to the use of hazardous materials in the workplace (CCR Title 8) include requirements for safety training, availability of safety equipment, accident and illness prevention programs, warnings about exposure to hazardous substances, and preparation of emergency action and fire prevention plans. Hazard communication program regulations that are enforced by Cal/OSHA require workplaces to maintain procedures for identifying and labeling hazardous substances; inform workers about the hazards associated with hazardous substances and their handling; and prepare health and safety plans to protect workers at hazardous waste sites. Employers also must make material safety data sheets available to employees and document employee information and training programs.

California Accidental Release Prevention

The purpose of the California Accidental Release Prevention (CalARP) program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, to minimize the damage if releases do occur, and to satisfy community right-to-know laws. In accordance with this program, businesses that handle more than a threshold quantity of a regulated substance are required to develop a risk management plan (RMP). The RMP must provide a detailed analysis of potential risk factors and associated mitigation measures that can be implemented to reduce accident potential. CUPAs implement the CalARP program through review of RMPs, facility inspections, and public access to information that is not confidential or trade secret.

Emergency Planning and Community Right-to-Know Act – Toxic Release Inventory

Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) established the Toxic Release Inventory (TRI). TRI is a publicly available database containing information on disposal and other releases of toxic chemicals from industrial facilities. As stipulated in 40 CFR Part 372, owners or operators of facilities that release toxic chemicals above a certain threshold (25,000 pounds or more per year) are required to submit information about (1) on-site releases and other disposals of toxic chemicals; (2) on-site recycling, treatment, and energy recovery associated with TRI chemicals; (3) off-site transfers of toxic chemicals from TRI facilities to other locations; and (4) pollution prevention activities at facilities.

Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (California Health and Safety Code Chapter 6.5, Section 25100 et seq.) authorizes Cal/EPA and DTSC, a department within Cal/EPA, to regulate the generation, transport, treatment, storage, and disposal of hazardous wastes. DTSC can also delegate enforcement responsibilities to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials under the authority of the HWCL.

California Health and Safety Code, Management of Used Oil

Sections 25250-25250.30 of the California Health and Safety Code specify requirements related to management of used oil, which is typically considered a hazardous waste. The regulations prohibit the disposal of used oil by discharge to sewers, drainage systems, surface water or groundwater, or by deposit on land; and include reporting requirements for transport of used oil to recycling facilities. However, Section 25250.4 identifies an exemption for “dielectric fluid removed from oil-filled electrical equipment that is filtered and replaced, onsite, at a restricted access electrical equipment area, or that is removed and filtered at a maintenance facility for reuse in electrical equipment and is managed in accordance with the applicable requirements of Part 279 (commencing with Section 279.1) of Subchapter I of Chapter 1 of Title 40 of the Code of Federal Regulations.” This section clarifies that “oil-filled electrical equipment” includes, but is not limited to, transformers, circuit breakers, and capacitors.

California Health and Safety Code, Hazardous Waste Utility Exemption

Section 25143.1.5 of the California Health and Safety Code establishes an exemption from hazardous waste control requirements and fees for wood waste, including any wood waste previously treated with a preservative that has been removed from electric, gas, or telephone service, as long as the following conditions are met:

1. The wood waste is not subject to regulation as a hazardous waste under the federal act.
2. The wood waste is disposed of in a composite-lined portion of a municipal solid waste landfill that meets any requirements imposed by the state policy adopted pursuant to Section 13140 of the Water Code and regulations adopted pursuant to Sections 13172 and 13173 of the Water Code.
3. The solid waste landfill used for disposal is authorized to accept the wood waste under waste discharge requirements issued by the RWQCB pursuant to Division (commencing with Section 13000) of the Water Code.

The Unified Program

The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of six environmental and emergency response programs. CalEPA and other State agencies set the standards for their programs while local governments implement the standards. These local implementing agencies are called CUPAs. For each county, the CUPA regulates/oversees the following:

- HMBPs;
- CalARP plans or federal risk management plans;
- The operation of underground storage tanks (USTs) and ASTs;
- Universal waste and hazardous waste generators and handlers;
- On-site hazardous waste treatment;
- Inspections, permitting, and enforcement;
- Proposition 65 reporting; and
- Emergency response.

The CUPA for San Luis Obispo County is the County of San Luis Obispo Department of Environmental Health.

California Emergency Services Act

The California Emergency Services Act (California Government Code, Chapter 7) established Cal EMA and created requirements for emergency response training and planning. Under this act, the State is required to develop a statewide toxic disaster contingency plan that can facilitate an

effective, multi-agency response to a situation in which toxic substances are dispersed in the environment so as to cause, or potentially cause, injury or death to a substantial number of persons or substantial harm to the natural environment (7 California Government Code, Section 8574.18). The California Emergency Services Act also requires the agency to develop and manage the California Hazardous Substances Incident Response Training and Education Program, which provides classes in hazardous substance response (7 California Government Code 8574.20). Under the California Emergency Services Act, Cal EMA would have the ability to provide an effective response to a catastrophic hazardous materials release.

California Fire Code

The California Fire Code (24 CCR Part 9) establishes minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings. Chapter 33 of the Code contains requirements for fire safety during construction and demolition activities, such as development of a pre-fire plan in coordination with the fire chief; maintaining vehicle access for firefighting at construction sites, and requirements related to safe operation of internal combustion engine construction equipment.

Specifically, the California Fire Code requires that smoking only be conducted in approved areas (Section 3304.1), materials susceptible to spontaneous ignition, such as oily rags, be stored in a listed disposal container (Section 3304.2.4), sources of ignition and smoking be prohibited in flammable and combustible liquid storage areas (Section 3305.4), and that structures under construction be provided with not less than one approved portable fire extinguisher, including one in every storage and construction shed and additional portable fire extinguishers where special hazards exist including where flammable and combustible liquids are stored and used (Section 3315.1), among other requirements. Chapter 35 of the California Fire Code governs welding and other hot work and imposes numerous safety requirements to minimize the risk of fire ignition from these activities.

CAL FIRE Wildland Fire Management

The Office of the State Fire Marshal and CAL FIRE administer State policies regarding wildland fire safety. Construction contractors must comply with the following requirements in the PRC during construction activities at any sites with forest-, brush-, or grass-covered land:

- Earthmoving and portable equipment with internal combustion engines must be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC Section 4442).
- Appropriate fire-suppression equipment must be maintained from April 1 to December 1, the highest-danger period for fires (PRC Section 4428).
- On days when a burning permit is required, flammable materials must be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor must maintain the appropriate fire-suppression equipment (PRC Section 4427).

- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines must not be used within 25 feet of any flammable materials (PRC Section 4431).

California Highway Patrol

The California Highway Patrol (CHP), along with Caltrans, enforces and monitors hazardous materials and waste transportation laws and regulations in California. These agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roads. All motor carriers and drivers involved in transportation of hazardous materials must apply for and obtain a hazardous materials transportation license from CHP.

Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations

CARB has established the ATCM for Construction, Grading, Quarrying, and Surface Mining Operations to minimize the generation of asbestos from earth disturbance or construction activities. The Asbestos ATCM applies to any project that will include sites to be disturbed in a geographic ultramafic rock unit area or an area where naturally occurring asbestos (NOA), serpentine, or ultramafic rocks are determined to be present. Under the ATCM, prior to any grading activities at a development site, a geologic analysis is required to determine if serpentine rock is present. If NOA is found at a development site, preparation of an Asbestos Health and Safety Program and an Asbestos Dust Mitigation Plan are required. These plans require approval by the SLOCAPCD before construction begins.

Porter-Cologne Water Quality Control Act

As discussed in more detail in Section 4.10, "Hydrology and Water Quality", the Porter-Cologne Water Quality Control Act (California Water Code, Division 7), also known as the Porter-Cologne Act, is the provision of the California Water Code that regulates water quality in California and authorizes the SWRCB and RWQCBs to implement and enforce the regulations.

RWQCBs regulate discharges under the Porter-Cologne Act primarily through the issuance of waste discharge requirements (WDRs). Anyone discharging or proposing to discharge materials that could affect water quality must file a report of waste discharge. The SWRCB and applicable RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Proposed Project, reasonably foreseeable distribution components, and alternatives are in areas under the jurisdiction of the Central Coast RWQCB (CCRWQCB).

4.9.3 Environmental Setting

Regional Setting and Existing Land Use

The Proposed Project, reasonably foreseeable distribution components, and alternatives are located in the north-central portion of San Luis Obispo County, California, within and around Paso Robles. The Estrella Substation would be located on approximately 15 acres of land that is currently under agricultural cultivation as a vineyard. The Proposed Project new and reconducted 70 kV power line segments would traverse lands primarily under agricultural

production or undeveloped, as well as rural residential and dense residential (reconductoring segment) land uses. The reasonably foreseeable distribution components would similarly traverse agricultural lands as well as follow existing road rights-of-way.

The alternatives would be located on generally similar types of existing land uses, although this would vary by alternative. Alternatives PLR-1A and PLR-1C would pass through largely agricultural areas and more rural areas north of the Paso Robles Airport in comparison to the Proposed Project, although the reconductoring segment for these routes would pass through the same dense residential land uses towards the Paso Robles Substation. The alternative substation sites under Alternative SS-1 and SE-1A are both located in areas of current or former agricultural production. The 70 kV power line route for Alternative SE-PLR-2 would pass through primarily rural residential areas, as well as some denser residential development nearer to the Paso Robles Substation.

The example FTM battery storage sites considered in this DEIR for Alternative BS-2 are primarily undeveloped with differing surrounding land uses. FTM Sites 1-4 are located in industrial, commercial, and residential areas of Paso Robles relatively close to downtown, whereas FTM Site 5 is located adjacent to Paso Robles Airport and FTM Sites 6-8 are located adjacent to existing regional substations.

Figure 2-7 in Chapter 2, *Project Description*, and multiple figures in Chapter 3, *Alternatives Description*, show aerial imagery depicting the existing land cover/land uses at Proposed Project, reasonably foreseeable distribution components, and alternative sites.

Airports

The primary public airport in the vicinity of the Proposed Project, reasonably foreseeable distribution components, and alternatives is the Paso Robles Municipal Airport, which is a two-runway airport located at 4912 Wing Way, Paso Robles. This airport is located approximately 2.2 miles northwest of the proposed Estrella Substation and about 1.25 miles northeast of the northernmost portion of the new Proposed Project 70 kV power line segment. Portions of the new 70 kV power line segment are within the airport land use plan (ALUP) area (refer to Figure 4.11-3 in Section 4.11, "Land Use and Planning"). Portions of the reasonably foreseeable distribution components (including the entirety of the northern new distribution line segment) would also be located within the ALUP area.

The Estrella Route variations (Alternatives PLR-1A and PLR-1C) pass relatively close (approximately 1 mile north) to the Paso Robles Municipal Airport and are within the ALUP area for approximately 4 miles of their respective routes. The Bonel Ranch Substation Site (Alternative SS-1) would be 4.5 miles from this airport. Alternatives SE-1, SE-PLR-2, and all of the example FTM battery storage sites (with the exception of FTM Site 5) would be more than 4 miles from the airport. As noted above, FTM Site 5 would be located immediately adjacent to the CAL FIRE Air Attack Base, which is adjacent to the Paso Robles Municipal Airport.

Other airports in the area include the Bonel Airport, which is a small private airport, located approximately 0.7-mile from the Bonel Ranch Substation Site (Alternative SS-1) and the Alternative PLR-1C 70 kV power line route. The Oak Country Ranch Airport, located at 5161 Vineyard Drive in Paso Robles is approximately 6.7 miles west of Alternative SE-1A and 7.4 miles southwest of the reconductoring segment for the Proposed Project. The Santa Margarita Ranch

Airport, located between Highway 101 and El Camino Real (north of Santa Margarita) is approximately 5.5 miles southeast of the example FTM Site 7 at the Atascadero Substation.

Airports in the vicinity of the Proposed Project, reasonably foreseeable distribution components, and alternatives are shown on Figure 4.9-1.

Schools

Numerous schools are located in Paso Robles and the surrounding area, as shown in Figure 4.9-1. None of these schools are located within 0.25-mile of the proposed Estrella Substation, the Proposed Project new or reconducted 70 kV power line route segments, or the reasonably foreseeable distribution components. The nearest school to the Proposed Project is Kermit King Elementary School, which is located at 700 Schoolhouse Circle, Paso Robles, approximately 0.3 mile east of the reconductoring segment.

With the exception of the example FTM Site 4, none of the alternatives would be located within 0.25 mile of a school. FTM Site 4 would be located on property owned by the Paso Robles Joint Unified School District and would be directly adjacent to the existing Paso Robles High School. Table 4.9-1 lists the schools nearest to the Proposed Project components, as well as the reasonably foreseeable distribution components and each respective alternative.

Table 4.9-1. Schools in the Vicinity of the Proposed Project, Reasonably Foreseeable Distribution Components, and Alternatives

Proposed Project or Alternative Component		Nearest School(s)	Proximity (miles)
ID / No.	Name		
PP	70 kV Power Line	<ul style="list-style-type: none"> ▪ Kermit King Elementary School, 700 Schoolhouse Circle, Paso Robles 	0.3
PP	Estrella Substation	<ul style="list-style-type: none"> ▪ The Children’s Academy Montessori Preschool, 711 Rolling Hills Rd, Paso Robles 	3.7
RFDC	Reasonably Foreseeable Distribution Components	<ul style="list-style-type: none"> ▪ The Children’s Academy Montessori Preschool, 711 Rolling Hills Rd, Paso Robles 	2.7
SS-1	Bonel Ranch Substation Site	<ul style="list-style-type: none"> ▪ Pleasant Valley Elementary School, 2025 Ranchita Canyon Rd, San Miguel 	4.5
PLR-1A	Estrella Route to Estrella Substation	<ul style="list-style-type: none"> ▪ Pleasant Valley Elementary School, 2025 Ranchita Canyon Rd, San Miguel 	1
PLR-1C	Estrella Route to Bonel Ranch, Option 1	<ul style="list-style-type: none"> ▪ Pleasant Valley Elementary School, 2025 Ranchita Canyon Rd, San Miguel 	1
PLR-3A	Strategic Undergrounding, Option 1	<ul style="list-style-type: none"> ▪ Cuesta College North County Campus, 2800 Buena Vista Dr, Paso Robles 	0.6
PLR-3B	Strategic Undergrounding, Option 2	<ul style="list-style-type: none"> ▪ Cuesta College North County Campus, 2800 Buena Vista Dr, Paso Robles 	0.6
SE-1A	Templeton Substation Expansion – 230/70 kV Substation	<ul style="list-style-type: none"> ▪ Templeton Middle School, 925 Old County Rd, Templeton 	1.8
SE-PLR-2	Templeton-Paso South River Road Route	<ul style="list-style-type: none"> ▪ Paso Robles High School, 801 Niblick Rd, Paso Robles ▪ Paso Robles Independent Study Center, 812 Niblick Rd, Paso Robles ▪ Liberty High School, 810 Niblick Rd, Paso Robles 	0.4
BS-2	Battery Storage to Address the Distribution Objective		

Proposed Project or Alternative Component		Nearest School(s)	Proximity (miles)
ID / No.	Name		
FTM Site #1		<ul style="list-style-type: none"> ▪ Paso Robles High School, 801 Niblick Rd, Paso Robles ▪ Paso Robles Independent Study Center, 812 Niblick Rd, Paso Robles ▪ Liberty High School, 810 Niblick Rd, Paso Robles 	0.3
FTM Site #2		<ul style="list-style-type: none"> ▪ Paso Robles High School, 801 Niblick Rd, Paso Robles ▪ Paso Robles Independent Study Center, 812 Niblick Rd, Paso Robles ▪ Liberty High School, 810 Niblick Rd, Paso Robles 	0.6
FTM Site #3		<ul style="list-style-type: none"> ▪ Pat Butler Elementary School, 700 Nicklaus St, Paso Robles 	0.5
FTM Site #4		<ul style="list-style-type: none"> ▪ Paso Robles High School, 801 Niblick Rd, Paso Robles 	0
FTM Site #5		<ul style="list-style-type: none"> ▪ Pleasant Valley Elementary School, 2025 Ranchita Canyon Rd, San Miguel ▪ Cuesta College North County Campus, 2800 Buena Vista Dr, Paso Robles 	2.7
FTM Site #6		<ul style="list-style-type: none"> ▪ Templeton Middle School, 925 Old County Rd, Templeton, CA 	1.8
FTM Site #7		<ul style="list-style-type: none"> ▪ Atascadero Cooperative Preschool, 8935 Amapoa Ave, Atascadero, CA 	0.7
FTM Site #8		<ul style="list-style-type: none"> ▪ Lillian Larsen Elementary School, 1601 L St, San Miguel, CA 	0.7

Notes: PP = Proposed Project; RFDC = Reasonably Foreseeable Distribution Components; SS = Substation Site; PLR = Power Line Route; SE = Substation Expansion; BS = Battery Storage; FTM = front-of-the-meter

Naturally Occurring Asbestos

Serpentine rock is a source of NOA and is known to occur in portions of San Luis Obispo County. Asbestos is a known carcinogen and inhalation of asbestos may result in lung cancer or mesothelioma. Exposure and disturbance of rock and soil that contains asbestos can result in the release of fibers to the air and consequent exposure to the public. As noted in Section 4.9.2 above, CARB has identified asbestos as a toxic air contaminant. However, serpentine soils in the county are generally limited to the coastal and inland mountain ranges and are not typically found in the inland valleys. No serpentine soils are mapped in Paso Robles or in the areas of the Proposed Project, reasonably foreseeable distribution components, or alternatives (SLOCAPCD 2020).

Agricultural Pesticide Use

As discussed above, many segments/portions of the Proposed Project (including the Estrella Substation site and much of the new 70 kV power line route) pass through, or are located on, areas currently under agricultural production. Similarly, many of the alternatives are located on agricultural lands. These areas may be subject to pesticide applications, which can contaminate the soils. Many different types of pesticides are used in commercial agriculture, some of which degrade more quickly than others. In general, pesticide use is assumed to occur on a regular basis in all vineyards and crop fields on and adjacent to the Proposed Project site, reasonably foreseeable distribution components, and alternatives (for alternatives located on or near agricultural lands) according to individual crop needs during the growing season.

Existing Hazardous Materials Sites

In general, hazardous materials contamination sites in urban and suburban areas are typically associated with historic or current light industrial uses, such as auto repair shops, gas stations, and dry-cleaning facilities. Hazardous materials contamination in rural areas is more typically associated with activities such as agricultural processing and mining sites.

A number of documented hazardous materials contamination/clean-up sites exist in the greater Paso Robles area, as shown in Figure 4.9-1. None of these sites are located on or immediately adjacent to the proposed Estrella Substation site. Four permitted underground storage tanks (USTs), including one closed clean-up site, are located approximately 900 feet south of the proposed 70 kV power line at Golden Hill Road just north of SR 46 (SWRCB 2019). Additionally, two permitted USTs and one closed leaking underground storage tank (LUST) clean-up site are located approximately 300 feet west/southwest of the Paso Robles Substation, which is the southern terminus of the Proposed Project's reconductoring segment (as well as the reconductoring segments for several alternatives power line routes [i.e., Alternative PLR-1A and PLR-1C]) (SWRCB 2019). No known existing hazardous materials sites are located in proximity to the reasonably foreseeable distribution components.

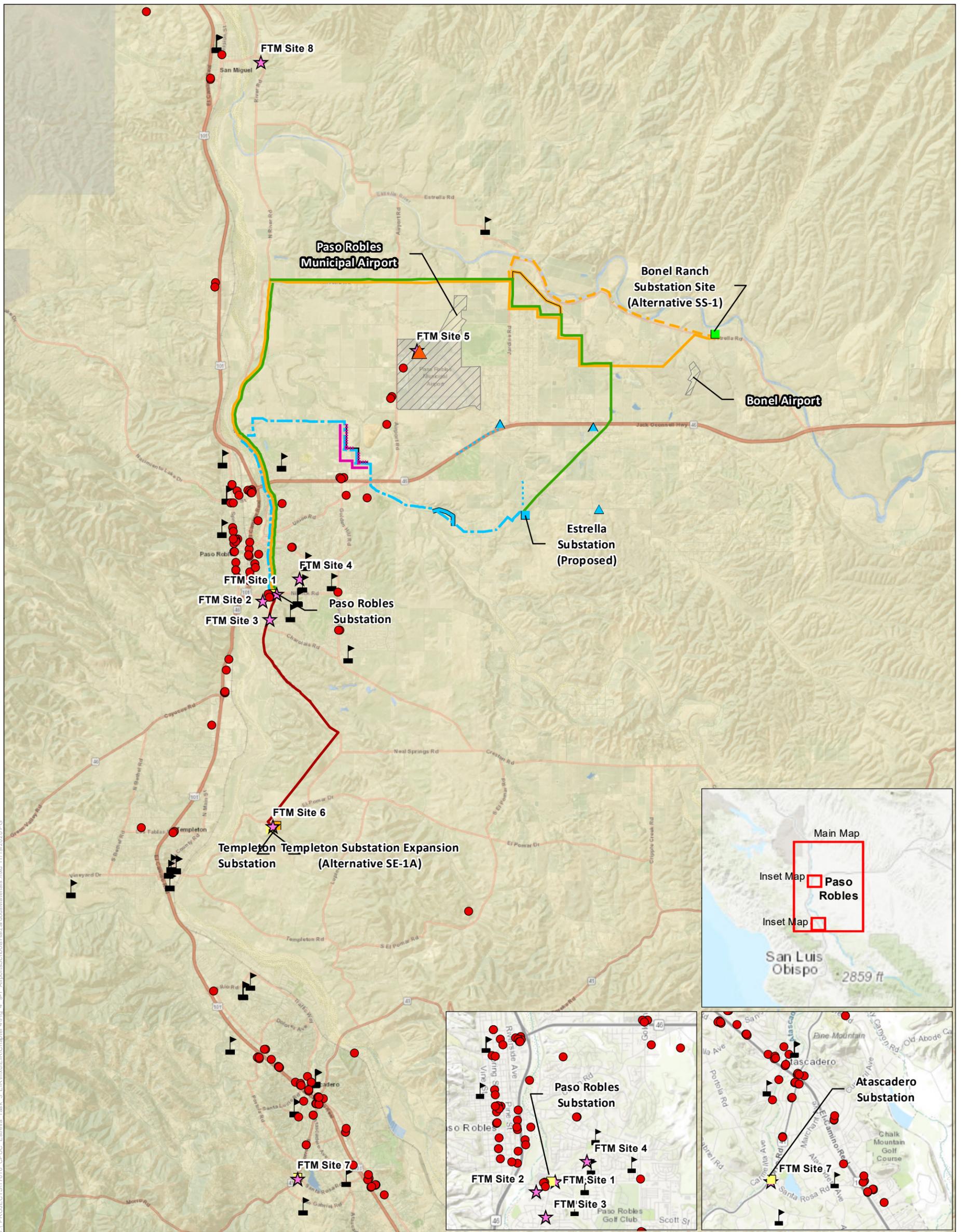
Several of the example FTM sites (1-4) are located relatively near the USTs and LUST clean-up site noted above. FTM Site 5 at the CAL FIRE Air Attack Base is located approximately 0.35 mile northeast of an inactive military cleanup site (SWRCB 2019). No existing hazardous materials sites are located near Alternatives SE-1A or SS-1, or FTM Sites 6, 7, or 8.

Fire Hazard

As shown on Figure 4.9-2, the proposed Estrella Substation site and the entirety of the proposed 70 kV power line, as well as the reasonably foreseeable distribution components, would be located in an LRA not designated as a very high fire hazard severity zone (VHFHSZ); however, the substation site would be located close (adjacent across Union Road) to an SRA designated high fire hazard severity zone (HFHSZ) (CAL FIRE 2009, 2007). The Estrella Substation site would be located within an irrigated agricultural field (vineyard row crops), which generally would have low wildfire hazard potential. Much of the new power line segment would pass through irrigated lands with similarly low ignition potential. Portions of the new and reconductored 70 kV power line segments would pass through rural residential and undeveloped areas that would have greater amounts of vegetation and dry brush with consequently elevated wildfire hazard. The reasonably foreseeable new distribution line segments would be installed in irrigated agricultural areas and within the SR 46 right-of-way.

Several of the alternatives would be located wholly or partly within the SRA HFHSZ, as shown on Figure 4.9-2. Specifically, the entirety of the Bonel Ranch Substation Site (Alternative SS-1) and Templeton Substation Expansion site (Alternative SE-1A) would be located in the HFHSZ. Portions of Alternatives PLR-1A and PLR-1C (including Minor Route Variation 1) and the majority of the length of Alternative SE-PLR-2 would be located within the HFHSZ. Additionally, the example FTM Sites 6 and 8 would be within the HFHSZ.

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Figure 4.9-1

Airports, Schools, and Hazardous Material Sites

- Proposed Project**
- Estrella Substation
 - 70kV Route
 - 70 kV Minor Route Variation 1
- Reasonably Foreseeable Distribution Components**
- New Distribution Line Segments
 - ▲ Additional 21/12 kV Pad-Mounted Transformer
- Existing Infrastructure**
- Existing Substations

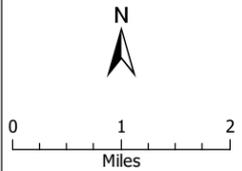
- Project Alternatives**
- ★ Front-of-the-Meter (FTM) Battery Storage Sites (Alternative BS-2)
 - Alternative SS-1: Bonel Ranch Substation Site
 - Alternative SE-1A: Templeton Substation Expansion - 230/70 kV Substation
 - Alternative PLR-1A: Estrella Route to Estrella Substation
 - Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1
 - Alternative PLR-1C: Minor Route Variation 1
 - Alternative PLR-1C: Minor Route Variation 2
 - Alternative PLR-3A: Strategic Undergrounding, Option 1
 - Alternative PLR-3B: Strategic Undergrounding, Option 2
 - Alternative SE-PLR-2: Templeton-Paso South River Road Route

- Features**
- Hazardous Waste Clean Up Sites
 - ▲ CAL FIRE Air Attack Base
 - ▲ Schools*
- Airports**
- Airport Boundaries

*Names of schools can be found in Table 4.9.1

Source: ESRI 2020, PG&E 2019, SCWA 2017, EnviroStar 2019

Note: The route variations shown are offset and simplified in order to display the alignments of the alternative routes that may overlap in places



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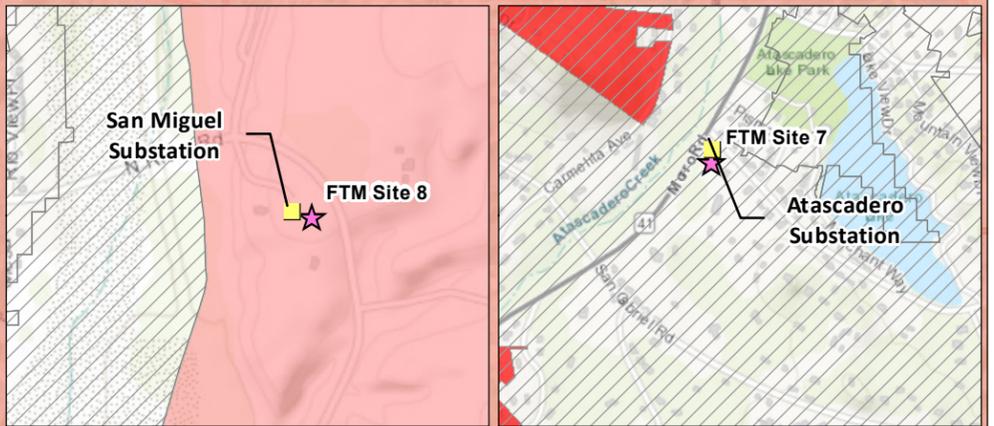
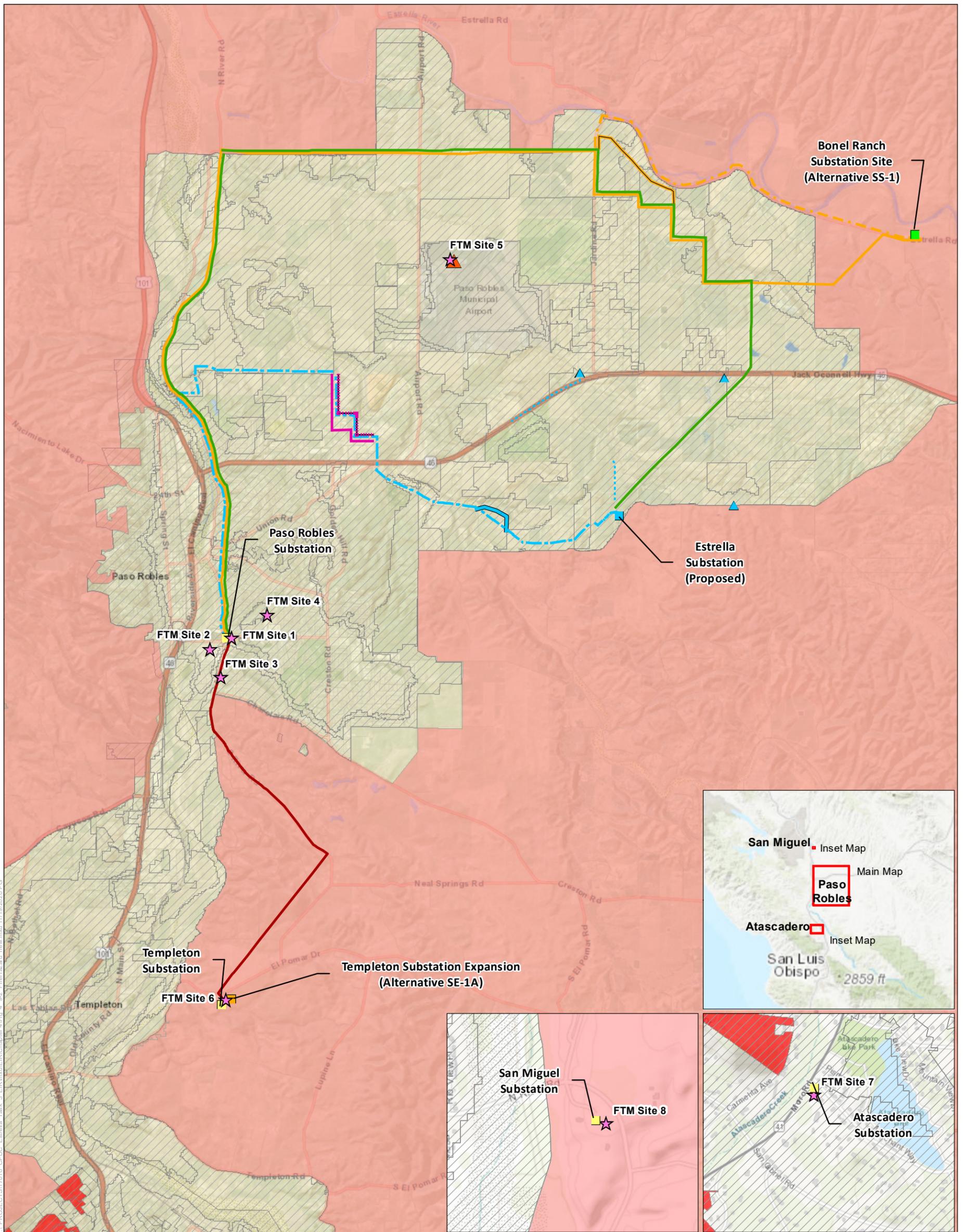


Figure 4.9-2
Fire Hazard Severity Map

Proposed Project

- Estrella Substation
- 70kV Route
- 70 kV Minor Route Variation 1
- Reasonably Foreseeable Distribution Components**
- New Distribution Line Segments
- ▲ Additional 21/12 kV Pad-Mounted Transformer
- Existing Infrastructure**
- Existing Substations

Project Alternatives

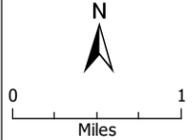
- ★ Front-of-the-Meter (FTM) Battery Storage Sites (Alternative BS-2)
- Alternative SS-1: Bonel Ranch Substation Site
- Alternative SE-1A: Templeton Substation Expansion - 230/70 kV Substation
- Alternative PLR-1A: Estrella Route to Estrella Substation
- Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1
- Alternative PLR-1C: Minor Route Variation 1
- Alternative PLR-1C: Minor Route Variation 2
- Alternative PLR-3A: Strategic Undergrounding, Option 1
- Alternative PLR-3B: Strategic Undergrounding, Option 2
- Alternative SE-PLR-2: Templeton-Paso South River Road Route

Fire Hazard Areas

- High Fire Hazard Zone State Responsibility Area
- ▨ Local Responsibility
- Local Responsibility Area Very High Fire Hazard Severity Zone
- ▲ CAL FIRE Air Attack Base

Source: ESRI 2018, PG&E 2019, SCWA 2017, CAL FIRE 2020

Note: The route variations shown are offset and simplified in order to display the alignments of the alternative routes that may overlap in places



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4.9.4 Impact Analysis

Methodology

Potential impacts related to hazards and hazardous materials from the Proposed Project, reasonably foreseeable distribution components, and alternatives were evaluated with respect to the applicable CEQA Guidelines Appendix G significance criteria, described below. Potential impacts also were considered in light of existing federal, state, and local laws and regulations related to hazards and hazardous materials, as well as the existing physical environment in the area of the Proposed Project, reasonably foreseeable distribution components, and alternatives, including proximity to sensitive receptors.

Criteria for Determining Significance

According to Appendix G of the CEQA Guidelines, the Proposed Project, reasonably foreseeable distribution components, and alternatives would result in a significant effect related to hazards and hazardous materials if they would:

- 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 wastes within 0.25 mile of an existing or proposed school.
- D. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5 and, as a result, 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, result in a safety hazard or excessive noise for people residing or working in the project area.
- F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- G. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Environmental Impacts

Proposed Project

Impact HAZ-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 of the Proposed Project would involve routine transport, use, and disposal of hazardous materials, such as diesel fuel, gasoline, lubrication oil, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, and cement slurry. These materials would primarily be contained within construction equipment, but may also be stored on site or transported to the site, and may be replenished or disposed of periodically. Table 4.9-2, from the Applicants' PEA, provides the hazardous materials typically used for construction, and which may be encountered during the Proposed Project.

Table 4.9-2. Hazardous Materials Typically Used in Construction

Hazardous Material	Hazardous Material
ABC fire extinguisher	Gasoline treatment
Acetylene gas	Hot stick cleaner (cloth treated with polydimethylsiloxane)
Air tool oil	Hydraulic fluid
Ammonium hydroxide	Insect killer
Antifreeze (ethylene glycol)	Insulating oil (inhibited, non-polychlorinated biphenyl [PCB])
Asphalt	Lubricating grease
Automatic transmission fluid	Mastic coating
Battery acid (in vehicles and substation control shelter)	Methyl alcohol
Bottled oxygen	Motor oil
Brake fluid	Paint thinner
Canned spray paint	Propane
Chain lubricant (contains methylene chloride)	Puncture seal tire inflator
Connector grease (penotox)	Starter fluid
Contact cleaner	Sulfur hexafluoride (within the circuit breakers in the substation)
Diesel de-icer	Two-cycle oil (contains distillates and hydro-treated heavy paraffin)

Hazardous Material	Hazardous Material
Diesel fuel	Wasp and hornet spray (1,1,1-trichloroethene)
Diesel fuel additive	WD-40
Eyeglass cleaner (contains methylene chloride)	ZEP (safety solvent)
Gasoline	

Source: NEET West and PG&E 2017

Routine transport, use, and disposal of hazardous materials during Project construction could potentially expose persons or the environment to hazards if adequate precautions are not taken. Because parts of the Proposed Project are located in or adjacent to inhabited areas, routine transport, use, and disposal of hazardous materials during Project construction could affect the general public, construction workers, or the environment. Such adverse effects could include illness from exposure to toxic substances or soil or groundwater contamination from inappropriate disposal practices.

The Proposed Project would be subject to several existing federal and state laws and regulations related to hazardous materials, which would include protective requirements designed to limit potential impacts to workers, the public, and the environment. In accordance with OSHA and Cal/OSHA requirements, the Applicants and/or their contractor(s) would be required to implement workplace training, safety procedures for the handling of hazardous substances, and ensure that workers are not exposed to hazardous materials above exposure limits. Additionally, the Applicants would implement APM HAZ-1, which would include hazardous substance control and emergency response procedures. The Applicants have committed in the PEA that wood poles removed from the project area during construction would be managed under the utility exemption of the California Health and Safety Code (Hazardous Waste Fee Health and Safety Code). The poles would be placed in containers and transported off site to an appropriate licensed Class I or Class II landfill or solid waste landfill.

Because the Proposed Project would disturb greater than 1 acre of land, it also would be subject to the Construction General Permit. As described in detail in Section 4.10, "Hydrology and Water Quality," this permit requires preparation and implementation of a SWPPP, which includes good site housekeeping measures, including protocols for proper storage and disposal of hazardous materials.

Compliance with these existing laws and regulations, as well as implementation of APM HAZ-1, would minimize potential for the Proposed Project to create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials during construction. Therefore, this impact would be **less than significant**.

Operation

Operation of the Proposed Project would involve relatively minimal transport, use, and disposal of hazardous waste, as the facilities would be operated remotely and would only require periodic maintenance and repair activities. Nevertheless, although infrequent, transport, use, and disposal of materials that could be used during operation and maintenance activities such

as transformer oil, solvents, and paints could potentially expose workers or the environment to adverse effects if adequate precautions are not taken.

The Proposed Project would be required to comply with applicable federal, state, and local laws and regulations related to hazardous materials management. As described in Section 4.9.2, “Regulatory Setting,” hazardous materials use, storage, transport, and disposal during Proposed Project operation would be subject to OSHA and Cal/OSHA regulations, which include requirements for the protection of worker health and safety (e.g., providing PPE to employees to ensure they are not exposed to hazardous substances above acceptable limits). The Proposed Project also would be required to comply with USEPA’s SPCC rule, as described further in Impact HAZ-2, and the Applicants would implement APM HAZ-1, which would include procedures that identify methods and techniques to minimize the exposure of the public and site workers to potential hazardous materials during all phases of Project construction and operation.

Given adherence to applicable laws and regulations, and implementation of APM HAZ-1, potential impacts associated with the routine storage, use, transport, and disposal of hazardous waste would be **less than significant**.

Impact HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions – *Less than Significant*

Construction

As described in Impact HAZ-1, construction of the Proposed Project would involve use, transport, storage, and disposal of hazardous materials, including, but not limited to, diesel fuel, gasoline, and lubrication oil (see Table 4.9-2 for a full list of materials). These materials would primarily be contained within construction equipment, but may also be stored on-site and/or transported to and from the site. Use of these materials could potentially result in accidental spills that could release hazardous materials into the environment. Such potential releases could harm plants, soil-dwelling microorganisms, or contaminate groundwater rendering it unfit for designated beneficial uses. Because portions of the Proposed Project area are inhabited, potential releases of hazardous materials due to upset or accident conditions would have the potential to affect the general public, as well as construction workers and the environment.

As described in Impact HAZ-1 and in Section 4.10, “Hydrology and Water Quality”, the Proposed Project would be required to obtain coverage under the Construction General Permit, which requires preparation and implementation of a SWPPP. The SWPPP would include good site housekeeping measures for proper storage and management of hazardous materials, as well as spill prevention, control, and counter-measures. Implementation of the SWPPP would greatly reduce the potential for Proposed Project construction activities to result in accidental releases of hazardous materials. In addition to the SWPPP, the Applicants would implement APM HAZ-1, which would include a number of measures designed to prevent or minimize the effects of potential releases of hazardous materials, including establishing site-specific buffers around construction vehicles and equipment located near sensitive resources and implementing emergency response and reporting procedures to address hazardous materials spills.

Given implementation of the above measures, accidental releases of hazardous materials during construction of the Proposed Project would be unlikely to occur. Should a release occur,

potential impacts on the public, construction workers, or the environment would be minimized. Therefore, this impact would be **less than significant**.

Operation

As described in Impact HAZ-1, operation of the Proposed Project would involve infrequent use, transport, and disposal of hazardous materials (e.g., fuel, paints, solvents, transformer oil, or similar substances). These materials could potentially create a significant hazard for workers, the public, or environment if they were to spill or otherwise be accidentally released.

Because the Proposed Project would store approximately 15,290 gallons of oil in the 230/70 kV transformer, it would be subject to the USEPA's SPCC rule, which requires preparation and implementation of an SPCC plan, including identification and implementation of appropriate spill containment structures and countermeasures. As described in Chapter 2, *Project Description*, the Proposed Project would include secondary containment structures designed to contain the oil volume of the transformers plus the 25-year 24-hour storm; this would be anticipated to, in part, satisfy the SPCC requirements and would minimize potential for a transformer oil spill to create a significant hazard to the public or the environment.

The Applicants also would prepare and implement a HMBP, which would include emergency and spill contingency-related requirements, such as the following (San Luis Obispo County Department of Environmental Health 2011a, 2011b):

- designating individuals responsible for verifying calls to appropriate authorities (911, San Luis Obispo County CUPA, and the State Office of Emergency Services) in the event of a spill;
- specifying the location of available equipment at the facility (e.g., fire extinguishing systems, spill control equipment, and decontamination equipment), and
- providing a training program for employees including training on the use of emergency response equipment and supplies for spills, fire, disposal, and first aid.

Implementation of the HMBP would further reduce potential for adverse impacts from hazardous materials during Proposed Project operation. Operation and maintenance of the new and reconducted power line, as well as the new and reconducted distribution line segments, would require minimal, if any, use of hazardous materials, but the measures included in APM HAZ-1 would reduce the potential for significant releases of such materials.

With adherence to applicable laws and regulations pertaining to hazardous materials and implementation of APM HAZ-1, the potential for operation of the Proposed Project to create a significant hazard to the public or environment through upset or accident conditions would be **less than significant**.

Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within 0.25 mile of an existing or proposed school – *No Impact*

No schools exist within 0.25 mile of the Estrella Substation or the new or reconducted 70 kV power line segments and no schools are proposed within 0.25 mile of these Proposed Project

components. As described in Section 4.9.3, the nearest school is approximately 0.3 mile from the reconductoring segment. Therefore, construction and operation of the Proposed Project would not emit hazardous emissions within 0.25 mile of a school. **No impact** would occur.

Impact HAZ-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, create a significant hazard to the public or the environment – *Less than Significant*

As described in Section 4.9.3 and shown in Figure 4.9-1, no identified hazardous materials sites are located on or in close proximity to the proposed Estrella Substation site, although several sites are identified in proximity to the proposed 70 kV power line. However, the Estrella Substation and a number of the new 70 kV poles would be located in an agricultural area with a history of chemical fertilizer and pesticide use. Construction of these Proposed Project features would involve soil excavation, and thus could encounter soil contaminants that may have migrated from the LUST sites located near the new 70 kV power line alignment or soil contaminated from the past chemical use. This could potentially expose construction workers, the public, or the environment to hazards; however, APM HAZ-1 would include measures for detection, testing, and proper handling and disposal of potentially contaminated soils encountered during construction. The measures in APM HAZ-1 would avoid or substantially minimize any potential impacts from contaminated soils resulting from the Proposed Project features being located on or near known or unknown hazardous materials sources. As a result, this impact would be **less than significant**.

Impact HAZ-5: 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, result in a safety hazard or excessive noise for people residing or working in the project area – *Less than Significant*

As noted in 4.9.3, a portion of the new 70 kV power line would be located within 2 miles of the Paso Robles Municipal Airport and within the ALUP area. Section 4.11, “Land Use and Planning”, discusses ALUP compatibility in more detail and Figure 4.11-3 shows the ALUP safety zones in relation to the proposed power line.

Under Federal Aviation Regulations Part 77, permanent structures that penetrate certain height restrictions for natural and artificial objects will endanger pilots and passengers of aircraft operating at the airport and will pose a hazard to persons occupying those structures. Federal regulations allow utility line facilities within prescribed height limits, and the Proposed Project’s facilities would be within these prescribed limits. Specifically, the LDSPs and/or TSPs comprising the new 70 kV power line within the ALUP area would be from 68 to 133 feet tall, which would be within the maximum limit of 200 feet above ground level established under 14 CFR Section 77.17. As described in the Applicants’ PEA, the Applicants filed a Notice of Proposed Construction and Alteration Application for the Proposed Project and the FAA determined that the new power line segment does not exceed FAA obstruction standards and no marking and/or lighting is required (NEET West and PG&E 2017).

Additionally, CAL FIRE has indicated that the new power line in the area of Golden Hill Road and Circle B Road would not pose a substantial hazard to helicopters that may access the pond within the Circle B Homeowners Association (HOA) for water supply to fight fires (Tully, pers. comm., 2020). CAL FIRE would likely use agricultural ponds in the area prior to using the Circle B

HOA pond, and would not typically use the Circle B HOA pond if people or animals (e.g., horses that may be frightened by helicopters) are in the area unless it is a severe emergency. However, in the event that CAL FIRE were forced to access the Circle B HOA pond or no other good options were available, the presence of the 70 kV power line approximately 400-500 feet from the pond should not pose a substantial hazard to aircraft (Tully, pers. comm., 2020).

The Proposed Project's reconductoring segment would not substantially change the height of the existing structures, although poles would be replaced, and is not expected to exceed obstruction standards or require any marking or lighting. The proposed substation would not pose a hazard to aircraft, as the substation would be outside of the ALUP area and would not include structures significantly taller than its surroundings (the substation would be located adjacent to existing 500 kV and 230 kV transmission lines, with structures up to 65 feet tall).

Given that the Proposed Project's 70 kV power line would be operated remotely and no staff would be permanently stationed on site, it would not subject any project occupants to safety hazards or noise from being located within the ALUP area. Construction activities for the portion of the Proposed Project 70 kV power line within the ALUP area also would not subject workers to substantial safety hazards. As noted above, although the Golden Hill Industrial Park, Cava Robles RV Resort, and surrounding land uses are within the ALUP area, these areas are well-traveled, populated areas. Construction workers would be present in the ALUP area temporarily. While conducting activities within the ALUP area would create some elevated risk for construction workers and equipment being impacted by a plane crash from an aircraft taking off or attempting a landing at the Paso Robles Airport, this risk would be extremely small. As a result, overall, the impacts associated with being within an ALUP area or within 2 miles of an airport during Proposed Project construction and operation would be **less than significant**.

Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan – *Less than Significant with Mitigation*

Construction of the Proposed Project would involve operation and temporary storage of large construction equipment, excavation and hauling of excavated material, and transport and storage of construction materials (e.g., conduit, conductor cables, electrical/SVC equipment, etc.). All of these activities would have the potential to disrupt traffic flow along roads adjacent to the Estrella Substation site and/or along the 70 kV power line alignment, which could potentially impede emergency response or evacuation procedures. The presence of large construction equipment and haul trucks on local roadways could potentially impede movement and access of emergency response vehicles or cause localized congestion and thereby interfere with evacuation procedures.

Union Road, on which the proposed substation would be located, is located in a relatively rural area of San Luis Obispo County, but it is the main thoroughfare for the area. As such, it could be used by emergency vehicles and may be used as an evacuation route by residents in the event of an emergency. As noted above, construction traffic entering and exiting the substation may cause short-duration traffic delays or stoppage. Construction of the 70 kV power line would have similar effects in areas where poles would be located close to public roadways. Much of the power line alignment would traverse agricultural areas, but portions would cross or follow along various roadways, such as SR 46, Union Road, Germaine Way, Golden Hill Road, Buena Vista Drive, River Road, and others. Although most construction activities would not severely

impact traffic movement, and construction vehicles and equipment would only be operated on public roadways for short periods, it is possible that short-duration road or lane closures may be required. If local roadways were to be substantially impacted from construction activities such that emergency response and evacuation procedures would be substantially hindered, this would be a significant impact.

As described in Section 4.17, “Transportation and Traffic,” **Mitigation Measure TR-1** would require implementation of traffic control measures during construction, such as signage and flaggers, maintenance of two-way traffic flow on all impacted streets or identification of detour routes, and notification of emergency response agencies in advance of lane or road closures. Implementation of these measures would ensure that emergency response vehicles could still access all areas affected by the construction activities and/or could plan alternate routes to certain areas. Likewise, implementation of traffic control measures would ensure that evacuation routes are passable or alternate routes are available to allow residents to evacuate an affected area. The Applicants have committed in the PEA that crossing structure installation would generally be conducted during low-volume traffic times to the extent practicable; regardless, implementation of the traffic control measures under Mitigation Measure TR-1 described above would minimize impacts on emergency response and evacuation from crossing structure installation.

Following completion of construction activities, the Proposed Project would be operated remotely and no staff would typically be on-site during Proposed Project operation. No permanent Proposed Project structures or equipment would interfere with vehicle movement on public roadways. Site maintenance and inspections would be sporadic and would occur only a few times per year. Overall, implementation of Mitigation Measure TR-1 would minimize potential impacts during construction, and no impacts to emergency vehicle access or evacuation procedures would occur during operation. Therefore, this impact would be **less than significant with mitigation**.

Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires – *Less than Significant*

Construction

Proposed Project construction activities would involve use of combustion-engine construction equipment, as well as storage of potentially flammable materials, such as fuel or lubricating oil. Construction activities could potentially provide a spark or ignition source, or introduce materials that could combust or burn at high intensity if exposed to a heat source. Heat or sparks from vehicles or hot work activities also could ignite dry vegetation and cause fires. As such, construction activities could increase the risk of initiating a wildland fire.

As shown in Figure 4.9-2, the proposed substation and power line route are located adjacent to (across the road from) a HFHSZ; however, the proposed substation site and much of the power line route are currently developed for viticulture and devoid of brush or dry grass, reducing their ignition potential. Some parcels within 0.25 mile of the substation site are either ruderal grasslands or rangelands that, if left unmaintained under critical fire conditions, could present a fire hazard. Likewise, portions of the power line route and reconductoring segment would traverse some areas of oak woodlands, non-native grasslands, and other potentially flammable habitat types.

Other than initial vegetation clearing activities, Proposed Project construction activities would be confined to areas that have been cleared of vegetation, including access roads and work areas. Vehicles and equipment would primarily use existing roads to access work areas, all of which would be cleared of brush to reduce fire potential. New access roads or access roads needing improvement would be cleared of vegetation when constructed. Initial vegetation clearing activities would be subject to CAL FIRE Wildland Fire Management requirements included in the PRC for activities on sites with forest-, brush- or grass-covered lands, which include measures for reducing wildfire risk. As described in Section 4.9.2, this would include:

- equipping earthmoving and portable equipment with internal combustion engines with a spark arrestor (PRC Section 4442);
- maintaining fire suppression equipment during high fire danger periods (April 1 to December 1) (PRC Section 4428);
- removing flammable materials from potential ignition sources (e.g., construction equipment) on days when a burning permit is required (PRC Section 4427), and
- not using portable tools powered by gasoline-fueled internal combustion engines within 25 feet of flammable materials on days when a burning permit is required (PRC Section 4431).

Compliance with these requirements would reduce potential for accidental ignition of vegetative materials during the initial Proposed Project vegetation clearing activities, particularly on high fire risk days and during high fire danger times of the year.

Additionally, the Applicants and/or their contractors would be required to comply with the California Fire Code, including smoking only in designated areas, limiting ignition sources, and keeping appropriate fire-fighting equipment on site (see Section 4.9.2). Other sections of the California Fire Code would apply to any welding and hot work performed as part of the substation and power line construction. These requirements would serve to reduce ignition risks during construction activities and potentially allow for construction workers to quickly extinguish any incipient fires. Per the California Fire Code, Proposed Project construction activities also would need to provide for fire-fighting vehicle access to all construction sites, which would enable firefighters to effectively respond to and combat any fires at the construction sites.

Adherence to the above-described requirements would limit the potential for the Proposed Project to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, this impact would be **less than significant**.

Operation

During operation, the Proposed Project would not involve activities that would be anticipated to create a wildfire risk. Proposed Project operations may involve routine maintenance and repair activities involving use of internal-combustion engine construction equipment or flammable materials, but these activities would primarily be conducted within the fence line of the Estrella Substation, along maintained roadways, and within other paved areas. Routine operation and maintenance activities, per G.O. 95, would include vegetation clearing as needed to provide

defensible space while minimizing potential impacts from fires. In addition, the PG&E and HWT Wildfire Mitigation Plans prepared pursuant to California Public Utilities Code Section 8386 would be implemented. Refer to Section 4.20, "Wildfire," for further information about the wildfire mitigation plans.

The addition of an electrified substation and new overhead 70 kV power lines to the Paso Robles area would increase wildfire hazards to some degree above baseline conditions. With any electrified equipment, there is potential for accidental ignition of nearby vegetation, particularly during high fire hazard conditions/times of the year. In accordance with G.O. 95, the Proposed Project Applicants would be required to maintain acceptable clearances between the new/reconducted 70 kV power lines and any nearby trees or other vegetation to minimize the risk of the energized lines igniting wildfires. As noted above, the Estrella Substation would be located within an agricultural field not designated as a VHFHSZ or HFHSZ, where wildfire hazard would not be expected to be high, and the proposed 70 kV power line also would not pass through a VHFHSZ or HFHSZ. In addition, a CAL FIRE Air Attack Base is located adjacent to the Paso Robles Municipal Airport (Figure 4.9-2), which would help ensure quick response time should a wildfire occur. Given these mitigating factors, the additional wildfire risk/hazards from the creation of new electrified facilities through the Proposed Project, while difficult if not impossible to quantify, would be reasonably considered less than significant.

Because the Proposed Project would be operated remotely with no staff typically present on-site, a wildfire not caused by the Proposed Project but impacting the Proposed Project facilities would be unlikely to expose people to injury or death due to their presence on the Project site. The substation and power line facilities could be damaged by exposure to a wildfire in the area, but adherence to defensible space requirements would reduce the potential for damage. Therefore, this impact would be **less than significant**.

Reasonably Foreseeable Distribution Components and Ultimate Substation Buildout

The construction activities for the reasonably foreseeable distribution components and ultimate substation buildout would be similar to those for the Proposed Project, but on a much smaller scale. Construction of the reasonably foreseeable distribution components and ultimate substation buildout would require use, storage, and disposal of hazardous materials (e.g., fuel, oil, lubricants, etc.). Like the Proposed Project, APM HAZ-1 would be implemented during construction of the facilities; further, applicable federal, state and local laws would be adhered to during construction, which would reduce the potential to create a significant hazard to the public or the environment from use of these materials. As described in Chapter 2, the reasonably foreseeable distribution components would include a 70/21 kV distribution transformer that would include mineral oil and secondary containment. Ultimate substation buildout would similarly include an additional 230/70 kV transformer, assumed to include the same amount of mineral oil (16,000 to 18,000 gallons) as described for the Proposed Project's 230/70 kV transformer, and the same secondary containment structure (i.e., designed to allow sufficient freeboard to include the oil volume of the transformer plus the precipitation from a 25-year, 24-hour storm event). Like the Proposed Project, the additional 230/70 kV transformer would be subject to the USEPA's SPCC rule, which requires preparation and implementation of an SPCC plan, including identification and implementation of appropriate spill containment structures and countermeasures. With adherence to applicable laws and regulations pertaining

to hazardous materials and implementation of APM HAZ-1, impacts under significance criteria A and B would be rendered **less than significant**.

No schools exist, nor are any proposed, within 0.25 mile of the reasonably foreseeable distribution components and ultimate substation buildout components (which would be located primarily within the already-constructed Estrella Substation site); therefore, **no impact** would occur under significance criterion C. Construction of the reasonably foreseeable distribution components would have limited potential to encounter soils contamination because the distribution poles would be direct embedded with relatively minimal excavation and ground disturbance. Also, the reasonably foreseeable distribution components would be installed primarily along existing roads. Likewise, some ground disturbance would be required for constructing the ultimate substation buildout equipment, specifically equipment foundations and substation wiring; however, this would occur within the fence line of the already-constructed Estrella Substation. As shown on Figure 4.9-1, no known hazardous sites are located on or in close proximity to the reasonably foreseeable distribution components. If contaminated soils or groundwater are encountered during construction of the reasonably foreseeable distribution components and/or for ultimate substation buildout, implementation of APM HAZ-1 would reduce adverse effects to a less than significant level. Therefore, impacts under significance criterion D would be **less than significant**.

Portions of the reasonably foreseeable distribution components, in particular the northern new distribution line segment, would be located within the ALUP area for the Paso Robles Municipal Airport. However, the reasonably foreseeable distribution components would be no taller than the existing distribution service lines in the area (the new distribution line segments would simply fill gaps in the existing distribution line network) and therefore would not pose a hazard to aircraft. With respect to ultimate substation buildout, equipment and facilities would primarily be placed within the fence line of the already-constructed Estrella Substation. Installation of additional transmission and distribution transformers and associated equipment within the 70 kV and 230 kV substations is assumed to not result in any increase in height of the substation. The LSTs installed for an additional 230 kV interconnection would be similar in height to the LSTs for the 230 kV interconnection included as part of the Proposed Project. Therefore, impacts under significance criterion E would be **less than significant**.

Construction of the reasonably foreseeable distribution components and ultimate substation buildout would be unlikely to substantially impact emergency response or evacuation procedures (especially the southern new distribution line segment, which would be installed along existing dirt roads within agricultural fields), but if traffic control measures were not implemented for activities within the roadway (e.g., SR 46), this could result in a significant impact. Implementation of **Mitigation Measure TR-1** would avoid or minimize any potential impacts on emergency response vehicle movement and evacuation procedures, ensuring that impacts under significance criterion F are **less than significant with mitigation**.

As shown in Figure 4.9-2, one additional pad-mounted transformer would be installed on the border of a HFHSZ, while the remainder of the reasonably foreseeable distribution components would be installed outside of the HFHSZ. Facilities proposed as part of ultimate substation buildout would be located within the fence line of the already-constructed Estrella Substation, outside of the HFHSZ. During construction, compliance with PRC and California Fire Code requirements (see discussion under Impact HAZ-7) would minimize potential for accidental

ignitions and limit the potential for an accidental ignition to evolve into a large and destructive fire. The addition of the pad-mounted transformer and other reasonably foreseeable distribution and ultimate substation buildout components would not substantially increase wildfire hazards in these areas above baseline conditions, as distribution lines, transformers, and associated equipment are already present in the area. Therefore, impacts under significance criterion G would be **less than significant**.

Alternatives

No Project Alternative

Under the No Project Alternative, no new substation or 70 kV power line would be constructed or operated. Thus, there would be no potential for hazardous materials exposure, accidental releases or related impacts from these activities. Potential hazardous materials impacts to the public and the environment would be the same as under baseline conditions. Therefore, **no impact** would occur under significance criteria A through E or G.

However, the No Project Alternative also would continue the status quo, where the regional transmission system would be susceptible to a N-1 or N-1-1 contingency (refer to Chapter 2 for discussion). It is reasonably expected that an N-1 or N-1-1 contingency would result in the loss of power to portions of Paso Robles for an extended period of time. Such a scenario could hinder emergency response and evacuation efforts generally (e.g., by preventing some electronic communications to residents). No feasible mitigation would be available to address this adverse effect. As a result, impacts under significance criterion F would be **significant and unavoidable**.

Alternative SS-1: Bonel Ranch Substation Site

Construction and operation of Alternative SS-1 would be similar to the proposed Estrella Substation. Thus, potential impacts from routine transport, use, and disposal of hazardous materials, and the potential to expose persons or the environment to such hazards would be the same. Like the Proposed Project, under Alternative SS-1, APM HAZ-1 would be implemented; a secondary containment structure would be included for transformer oil at the substation, and applicable federal, state and local laws related to hazardous materials would be followed during construction and operation. These measures would reduce the potential to create a significant hazard to the public or the environment. Therefore, impacts under significance criteria A and B would be **less than significant**.

No schools exist, nor are any schools proposed, within 0.25 mile of Alternative SS-1; therefore, **no impact** would occur under significance criterion C. Environmental databases do not identify any hazardous sites on or within 0.25 mile of the alternative substation site. While the agricultural nature of the Alternative SS-1 site indicates potential for pesticide soil contamination, implementation of APM HAZ-1 would reduce adverse effects on workers or the environment if contaminated soil were to be encountered during construction. As such, impacts under significance criterion D would be **less than significant**.

While Alternative SS-1 would be outside the ALUP area for the Paso Robles Municipal Airport, the alternative substation site is located roughly 4,000 feet northeast of a private air facility, Bonel Airport. Despite the close proximity, it is unlikely that Alternative SS-1 would pose a

hazard to aircraft because the substation would not include structures significantly taller than its surroundings (the substation would be located adjacent to existing 500 kV and 230 kV transmission lines). Therefore, impacts under significance criterion E would be **less than significant**.

Alternative SS-1 is located in a more rural location than the proposed Estrella Substation and construction is unlikely to substantially disrupt traffic flow along Estrella Road; however, if traffic control measures are not implemented for activities conducted within the roadway or for any temporary lane closures, this could result in a significant impact. Implementation of **Mitigation Measure TR-1** would minimize any potential impacts on emergency response and evacuation procedures from construction of Alternative SS-1, thereby ensuring that impacts under significance criterion F are **less than significant with mitigation**.

Compared to the Proposed Project, Alternative SS-1 would have elevated potential for wildfire hazard impacts. As shown in Figure 4.9-2, the Alternative SS-1 site would be located in a HFHSZ. While the site is currently used to grow alfalfa and is devoid of brush or dry grass, the Estrella River corridor and ruderal grasslands/rangelands are located nearby, increasing wildfire hazards and accidental ignition potential. Compliance with PRC and California Fire Code requirements (see discussion under Impact HAZ-7) would reduce the potential for accidental ignition of materials during construction activities and would minimize the potential for any accidental ignitions to evolve into uncontrolled wildfires. However, due to the elevated risk from being located in the HFHSZ, additional planning and care with respect to fire safety is warranted, as any careless actions during construction activities in this location could result in a significant impact by exposing people or structures to significant risk of loss, injury, or death involving wildland fires.

Therefore, **Mitigation Measure HAZ-1** would be implemented, which would require preparation and implementation of a project-specific fire prevention and management plan, including daily tracking of site-specific risk conditions and red flag warnings, coordination with CAL FIRE / San Luis Obispo County Fire Department officials, design and implementation of defensible space around the substation subject to CAL FIRE review, and other measures to further reduce potential wildfire impacts. Implementation of Mitigation Measure HAZ-1 would reasonably reduce the potential risks associated with constructing and operating Alternative SS-1 to a level that is less than significant. As such, impacts under significance criterion G would be **less than significant with mitigation**.

Mitigation Measure HAZ-1: Prepare and Implement a Fire Prevention and Management Plan.

For project or alternative components located within a very high or high fire hazard severity zone, HWT and PG&E shall prepare and implement a fire prevention and management plan. The document will address fire prevention measures that will be employed during the construction phases, identifying potential sources of ignition and detailing the measures, equipment, and training that will be provided to all site contractors. The fire prevention and management plan shall also address potential ignition risks during operation of the project or alternative components. Coordination with state and local fire agencies is required, as specified below, and the plan shall be submitted to the CPUC for final review and approval prior to start of construction.

Where applicable, overlap with the HWT and PG&E Wildfire Mitigation Plans prepared

pursuant to California Public Utilities Code Section 8386 shall be highlighted in the fire prevention and management plan. Specifically, the plan will include, at a minimum, the following:

Construction Fire Hazard Avoidance and Minimization

- Responsibilities and duties;
- Preparedness training and drills for HWT, PG&E, and contractor personnel;
- Procedures for fire reporting, response and prevention, including:
 - Identification of daily site-specific risk conditions;
 - The appropriate tools and equipment needed on vehicles and on hand at the construction site(s);
 - Reiteration of fire prevention and safety considerations during tailboard meetings; and
 - Daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity.
- Coordination procedures with CAL FIRE / San Luis Obispo County Fire Department officials;
- Crew training, including fire safety practices and restrictions; and
- Methods for verifying that the plan protocols and requirements are being followed during construction.

Design and Operation Considerations to Minimize Fire Hazard

- Design and implementation of defensible space around substation components;
- Vegetation management activities and schedules for ensuring CPUC G.O. 95 clearance requirements are met for transmission line components;
- Coordination with the CAL FIRE / San Luis Obispo County Fire Department to provide any needed training and technical support to fire personnel regarding electrical fires and firefighting at energized facilities;
- Appropriate design of driveways and access roads to substation components to allow for safe and efficient fire personnel and equipment access;
- Development and implementation of protocols for de-energizing the substation and/or transmission line components in the event of a wildfire; and
- Inclusion of any needed water storage facilities on-site at the substation accessible to firefighters.

The fire prevention and management plan shall be reviewed by the San Luis Obispo County Fire Department. After Fire Department review, the plan shall be submitted to the CPUC for approval a minimum of 40 days prior to commencement of construction activities.

Alternative PLR-1A: Estrella Route to Estrella Substation

Due to its longer length (6.5 miles longer) and the longer duration of construction (16 months longer), Alternative PLR-1A would have greater potential for construction-related hazards and hazardous materials impacts than the Proposed Project 70 kV power line. In other words, due to the additional construction activity required for this alternative, there would be more opportunity for improper handling or disposal of hazardous materials, as well as leaks or accidental releases of hazardous materials from construction equipment or storage containers. However, like the Proposed Project, under Alternative PLR-1A, APM HAZ-1 would be implemented and applicable federal, state and local laws would be adhered to during construction, which would reduce the potential to create a significant hazard to the public or the environment. As a result, impacts under significance criteria A and B would be **less than significant**.

No schools exist within 0.25 mile of the Alternative PLR-1A alignment; therefore, no impact would occur under significance criterion C. Alternative PLR-1A would have similar or reduced potential to encounter soils contamination as the Proposed Project 70 kV power line given the predominantly agricultural land uses along the alignment (and potential for pesticide soil contamination). Fewer known hazardous sites exist within 0.25 mile of Alternative PLR-1A compared to the Proposed Project's 70 kV power line alignment, as shown in Figure 4.9-1. If contaminated soils or groundwater is encountered during construction of this alternative, implementation of APM HAZ-1 would reduce adverse effects to a less than significant level. Therefore, impacts under significance criterion D would be **less than significant**.

Portions of the Alternative PLR-1A alignment are within the ALUP area for the Paso Robles Municipal Airport. The Alternative PLR-1A structures would be of similar height to those under the Proposed Project, which the FAA determined would not exceed FAA obstruction standards. Like the Proposed Project 70 kV power line, the reconductoring segment for Alternative PLR-1A would not substantially change the height of structures and would be relatively far from the airport. As such, impacts under significance criterion E would be **less than significant**. Construction of Alternative PLR-1A is less likely to disrupt traffic flow compared to the Proposed Project since the alternative alignment runs through largely rural, agricultural lands and then eventually along Wellsona Road, which is not a main thoroughfare. Nevertheless, if construction activities within roadways in these areas or temporary lane or road closures were to be conducted without implementation of traffic control measures, this could result in a significant impact. Implementation of **Mitigation Measure TR-1** would require implementation of traffic control measures during construction of Alternative PLR-1A and would ensure that impacts to emergency response and evacuation procedures are less than significant. As a result, impacts under significance criterion F would be **less than significant with mitigation**.

A portion of Alternative PLR-1A is within the HFHSZ, which could increase wildfire risk for this alternative compared to the Proposed Project. Compliance with PRC and California Fire Code requirements (see discussion under Impact HAZ-7) would reduce the potential for accidental ignitions during construction activities and limit the potential for any accidental ignitions to

grow into uncontrolled wildfires. However, due to the elevated risk from being partially located in the HFHSZ, additional planning and care with respect to fire safety is warranted, as any careless actions during construction activities in this location could result in a significant impact by exposing people or structures to significant risk of loss, injury, or death involving wildland fires.

Therefore, **Mitigation Measure HAZ-1** would be implemented, which would require preparation and implementation of a fire prevention and management plan. Once constructed, Alternative PLR-1A would be maintained to achieve the vegetation clearances under G.O. 95. Compliance with applicable laws and implementation of Mitigation Measure HAZ-1 would reasonably reduce the potential wildfire hazards from Alternative PLR-1A to a level that is less than significant. Therefore, impacts under significance criterion G would be **less than significant with mitigation**.

Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1

Alternative PLR-1C would be similar in length to Alternative PLR-1A and would require a similarly extended construction duration compared to the Proposed Project. As such, the alternative would have the same potential for increased construction-related impacts from hazards and hazardous materials as Alternative PLR-1A (see above). Nevertheless, with implementation of APM HAZ-1 and compliance with existing hazardous materials laws and regulations, impacts under significance criteria A and B would be **less than significant**.

No schools exist, nor are any proposed, within 0.25 mile of the Alternative PLR-1C alignment; therefore, **no impact** would occur under significance criterion C. Alternative PLR-1C would have similar potential to encounter soils contamination given the predominantly agricultural land uses along the alignment (and potential for pesticide soil contamination). Fewer known hazardous sites exist within 0.25 mile of Alternative PLR-1C compared to the proposed 70 kV power line alignment (and no hazardous materials sites exist immediately on/within the Alternative PLR-1C alignment), as shown in Figure 4.9-1. If contaminated soils or groundwater are encountered during construction of this alternative, implementation of APM HAZ-1 would reduce adverse effects to a less than significant level. As such, impacts under significance criterion D would be **less than significant**.

As described in Section 4.9.3, portions of the Alternative PLR-1C alignment are within the ALUP area for the Paso Robles Municipal Airport (see Figure 4.11-3). The Alternative PLR-1C structures would be of similar height to those under the Proposed Project, which the FAA determined would not exceed FAA obstruction standards. Additionally, like the Proposed Project 70 kV power line, the reconductoring segment for Alternative PLR-1C would not substantially change the height of structures and would be relatively far from the airport. Therefore, impacts under significance criterion E would be **less than significant**. Construction of Alternative PLR-1C is less likely to disrupt traffic flow compared to the Proposed Project since the alternative alignment runs through largely rural, agricultural lands and then eventually along Wellsona Road, which is not a main thoroughfare. Nevertheless, if construction activities within roadways in these areas or temporary lane or road closures were to be conducted without implementation of traffic control measures, this could result in a significant impact. Implementation of **Mitigation Measure TR-1** would require implementation of traffic control measures during construction of Alternative PLR-1C and would ensure that impacts to emergency response and evacuation procedures are less than significant. As a result, impacts under significance criterion F would be **less than significant with mitigation**.

A greater proportion of Alternative PLR-1C, including Minor Route Variation 1, is located within or along the HFHSZ. This would increase potential wildfire hazards compared to Alternative PLR-1A and the Proposed Project. Compliance with PRC and California Fire Code requirements and G.O. 95 power line vegetation clearance requirements would reduce potential for accidental ignitions and adverse wildfire impacts during construction and operation of Alternative PLR-1C. However, due to the elevated risk from being partially located in the HFHSZ, additional planning and care with respect to fire safety is warranted, as any careless actions during construction activities in this location could result in a significant impact by exposing people or structures to significant risk of loss, injury, or death involving wildland fires. Therefore, **Mitigation Measure HAZ-1** would be implemented, which would further reduce potential wildfire impacts to a level that is less than significant. As a result, impacts under significance criterion G would be **less than significant with mitigation**.

Alternative PLR-3: Strategic Undergrounding, Option 1 & 2

Alternative PLR-3 would underground an approximately 1.2-mile portion of the proposed 70 kV power line. Thus, construction of Alternative PLR-3 (both Alternative PLR-3A [Option 1] and Alternative PLR-3B [Option 2]) would involve trenching along the length of the alignment, as well as construction of transition stations at each end of the underground alignment. Altogether, this would involve additional construction activity and associated hazardous materials use, transport, and disposal compared to the Proposed Project overhead 70 kV power line. As a result, Alternative PLR-3 would create additional opportunities for improper handling/management of hazardous materials or accidental releases of hazardous materials compared to the Proposed Project. However, implementation of APM HAZ-1, along with adherence to existing federal and state laws, would eliminate the potential for significant impacts (see Impact HAZ-1 and -2 for discussion). As such, impacts under significance criteria A and B would be **less than significant**.

No existing or proposed schools are located within 0.25 mile of Alternative PLR-3A or PLR-3B; therefore, **no impact** would occur under significance criterion C. Like the Proposed Project route, both Alternative PLR-3 route options would pass through developed areas with residential, commercial and industrial land uses just east of and along Golden Hill Road. Construction of Alternative PLR-3 may have increased potential to encounter subsurface contaminants from known hazardous materials sites in the area of Golden Hill Road; however, implementation of APM HAZ-1 would reduce these potential adverse effects to a level that is less than significant. As a result, impacts under significance criterion D for both Alternative PLR-3 options would be **less than significant**.

Alternative PLR-3 would be within the ALUP area for the Paso Robles Municipal Airport, but the majority of the alternative components (with the exception of the riser poles and associated facilities at the transition stations) would be underground and would not pose a hazard to aircraft. The riser poles and above-ground features at the transition stations would be of similar height to the overhead Proposed Project 70 kV power line, which were found by FAA to not pose a substantial hazard to aircraft. Therefore, impacts under significance criteria E would be **less than significant**. Construction of Alternative PLR-3 would require prolonged lane closures for trenching and related activities (refer to Chapter 3, *Alternatives Description*). If these activities were to substantially hinder emergency vehicle movement and evacuation procedures (e.g., residents attempting to leave the area during an emergency), this would result in a

significant impact. **Mitigation Measure TR-1** would require implementation of traffic control plan (e.g., signage and flaggers, maintenance of two-way traffic flow on all impacted streets or identification of detour routes, and notification of emergency response agencies in advance of lane or road closures), which would minimize potential adverse effects to a level that is less than significant. Therefore, the impacts on Alternative PLR-3 under significance criterion F would be **less than significant with mitigation**.

Like the Proposed Project, Alternative PLR-3 would not be located in a VHFHSZ or HFHSZ, although portions of the Alternative PLR-3 alignment (the northern portion) traverse areas of ruderal grasslands and oak woodland, which could provide fuel for a wildfire and be susceptible to ignition from construction activities. Compliance with PRC and California Fire Code requirements (see Impact HAZ-7 for discussion) would reduce the potential for accidental ignitions from construction activities under Alternative PLR-3 and limit the potential for any accidental ignitions to grow into uncontrolled wildfires. Once constructed, the Alternative PLR-3 components would be largely underground (with the exception of the transition stations) and would not pose a wildfire hazard. The transition stations would need to be maintained in accordance with G.O. 95 vegetation clearance requirements, which would minimize potential fire hazards. As a result, impacts under significance criterion G would be **less than significant**.

Alternative SE-1A: Templeton Substation Expansion – 230/70 kV Substation

Construction and operation of Alternative SE-1A would be similar to the proposed Estrella Substation. Thus, potential impacts from routine transport, use, and disposal of hazardous materials and the potential to expose persons or the environment to such hazards would be the same as the Proposed Project. Like the Proposed Project, APM HAZ-1 would be implemented, a secondary containment structure would be included for transformer oil, and existing federal, state, and local laws would be adhered to, thereby reducing the potential for construction or operation of Alternative SE-1A to create a significant hazard to the public or the environment. As a result, impacts under significance criteria A and B would be **less than significant**.

No schools exist, nor are any proposed, within 0.25 mile of the Alternative SE-1A site; therefore, **no impact** from hazardous emissions near schools would occur (significance criterion C). The Alternative SE-1A site is located in an agricultural area with a history of chemical fertilizer and pesticide use, and as such there is potential for encountering these contaminants in soil and groundwater. No known hazardous materials sites on or in the vicinity of the Alternative SE-1A site were identified in environmental databases. If contaminated soils or groundwater are encountered within the site footprint during construction of Alternative SE-1A, implementation of APM HAZ-1 would reduce adverse effects. Therefore, impacts under significance criterion D would be **less than significant**.

The Alternative SE-1A site is not located within the ALUP area for the Paso Robles Municipal Airport and is not located within 2 miles of any airport. Therefore, **no impact** would occur in regard to significance criterion E. Alternative SE-1A is located in a relatively rural location along El Pomar Drive. Nevertheless, if construction activities within roadways in this area or temporary lane or road closures were to be conducted without implementation of traffic control measures, this could result in a significant impact. Implementation of **Mitigation Measure TR-1** would require implementation of traffic control measures during construction of Alternative SE-1A and would ensure that impacts to emergency response and evacuation procedures are less than

significant. As a result, impacts under significance criterion F would be **less than significant with mitigation**.

The entirety of Alternative SE-1A would be located in a HFHSZ and potentially ignitable vegetation is present on and adjacent to the site, which would increase wildfire hazards compared to the proposed Estrella Substation. Compliance with PRC and California Fire Code requirements (see Impact HAZ-7 for discussion) would reduce potential for accidental ignitions during construction of Alternative SE-1A and for any accidental ignitions to grow into an uncontrolled wildfire. However, due to the elevated risk from being located in the HFHSZ, additional planning and care with respect to fire safety is warranted, as any careless actions during construction activities in this location could result in a significant impact by exposing people or structures to significant risk of loss, injury, or death involving wildland fires. Therefore, **Mitigation Measure HAZ-1** would be implemented, which would require preparation and implementation of a fire prevention and management plan. As described above under the Alternative SS-1 impact discussion, the fire prevention and management plan would further reduce potential wildfire impacts to a level that is less than significant. Therefore, impacts under significance criterion G would be **less than significant with mitigation**.

Alternative SE-PLR-2: Templeton-Paso South River Road Route

Due to its shorter length (4.8 miles shorter) and shorter construction duration, Alternative SE-PLR-2 would have less potential for construction-related hazards and hazardous materials impacts compared to the Proposed Project. Construction of Alternative SE-PLR-2 would involve use of the same types of hazardous materials as the proposed 70 kV power line, but the reduced construction activity/schedule would result in fewer opportunities for accidental releases of materials or improper storage, transport, or disposal. Like the Proposed Project, APM HAZ-1 would be implemented during construction of Alternative SE-PLR-2 and federal, state and local laws related to hazards and hazardous materials would be followed, which would reduce potential impacts. As a result, impacts under significance criteria A and B would be **less than significant**.

No existing or proposed schools are located within 0.25 mile of the Alternative SE-PLR-2 alignment; therefore, **no impact** would occur from hazardous emissions near schools (significance criterion C). Environmental databases identified several existing hazardous sites within 0.25 mile of the northern terminus of the Alternative SE-PLR-2 route (although none are directly within the alignment), including two permitted USTs and one closed LUST clean-up site, located off Niblick Road, just west of South River Road (SWRCB 2019). If contaminated soils or groundwater were encountered during excavation of pole foundations or other ground-disturbing construction activities for the alternative, implementation of APM HAZ-1 would reduce potential adverse effects to construction workers, the public, and the environment. Therefore, impacts under significance criterion D would be **less than significant**.

Alternative SE-PLR-2 would not be within the ALUP area for the Paso Robles Municipal Airport and would not be within 2 miles of any airport. Therefore, there would be no potential for adverse effects on aircraft or for exposing persons to hazards from placing facilities within proximity to an airport. As a result, **no impact** would occur under significance criterion E. Construction activities for Alternative SE-PLR-2 could cause temporary disturbances to South River Road, which may be used as an evacuation route by residents in the area. Additionally, lane and/or road closures may be required for Alternative SE-PLR-2 in areas where the

alignment crosses County roadways (see crossing structure locations on Figure 3-15). If construction activities were to obstruct emergency vehicle access or cause significant congestion such as to limit the ability of residents to evacuate the area, this would be a significant impact. **Mitigation Measure TR-1** would be implemented, which would require implementation of traffic control measures and notification of emergency services departments of any planned lane or road closures. Implementation of Mitigation Measure TR-1 would reduce potential impacts on emergency response and evacuation to a level that is less than significant. Therefore, impacts under significance criterion F would be **less than significant with mitigation**.

The majority of the Alternative SE-PLR-2 route (south of Charolais Road) would be located in an HFHSZ. Much of the alignment traverses areas of grasslands and oak woodland, which could be highly susceptible to wildfire. As a result, any accidental ignition from construction equipment or the electrified 70 kV power line once operational could have significant effects on the surrounding rural residential community along South River Road and surrounding areas. As described in Impact HAZ-7, compliance with PRC and California Fire Code requirements would reduce the potential for accidental ignitions during construction and limit the potential for any accidental ignitions to develop into uncontrolled wildfires. However, due to the elevated risk from being partially located in the HFHSZ, additional planning and care with respect to fire safety is warranted for Alternative SE-PLR-2, as any careless actions during construction activities in this location could result in a significant impact by exposing people or structures to significant risk of loss, injury, or death involving wildland fires.

Therefore, **Mitigation Measure HAZ-1** would be implemented, which would require preparation and implementation of a fire prevention and management plan. Once constructed, Alternative SE-PLR-2 would be maintained to achieve the vegetation clearances under G.O. 95. Overall, compliance with applicable laws and implementation of Mitigation Measure HAZ-1 would reasonably reduce the potential wildfire hazards from Alternative SE-PLR-2 to a level that is less than significant. Therefore, impacts under significance criterion G would be **less than significant with mitigation**.

Alternative BS-2: Battery Storage to Address the Distribution Objective

Construction of BESSs under Alternative BS-2 would involve use of hazardous materials contained in construction equipment, including many of the same materials that would be used for construction of the Proposed Project. Improper use, storage, transport, or disposal of these materials, as well as accidental releases of such materials through upset or accident conditions, could potentially cause impacts to the public or the environment. It is assumed that all applicable federal, state, and local laws would be followed during BESS construction.

Of the example FTM BESS sites identified for analysis in the DEIR, FTM Site 4 is the only site within 0.25 mile of a school (Paso Robles High School). While construction of a BESS at FTM Site 4 would likely involve some hazardous emissions from operation of diesel equipment (e.g., diesel particulate matter), these emissions would be short-term, lasting the duration of the construction period, and would be similar in nature to any type of construction project. These emissions would not result in substantial health risks to students or staff at the school. Once operational, a potential BESS at FTM Site 4, which would likely be a lithium-ion battery installation, would not generate hazardous emissions.

Example FTM Sites 1-3 are located within 0.25 mile of three permitted USTs, although no hazardous materials sites are located on any of the FTM sites. Ground-disturbing activities for construction of BESS facilities under Alternative BS-2 at FTM Sites 1-3 (e.g., grading and excavation for BESS equipment foundations) could encounter contaminants that have migrated from the nearby hazardous sites; however, compliance with OSHA requirements would minimize potential impacts to workers, the public, and the environment in the event of such an occurrence.

With the exception of FTM Site 5, none of the example FTM sites would be located within an ALUP or within 2 miles of an airport. FTM Site 5 is located directly adjacent to the CAL FIRE Air Attack Base, which is adjacent to the Paso Robles Airport. Although a potential BESS at FTM Site 5 would be located very close to the airport, it would not pose a significant hazard to aircraft given that it would be no taller than surrounding buildings and airport facilities. Additionally, a BESS, if installed, would not include any employees permanently on-site, and thus would not expose persons to hazards from being located within an ALUP area.

Construction activities for Alternative BS-2 may require use of heavy construction equipment and would involve truck trips for delivery of materials to BESS sites. Lane closures or road closures are not anticipated to be necessary, but construction equipment and truck movement around sites could temporarily cause congestion or limit emergency vehicle movement. Example FTM Sites 1-4 would have greater potential for impacts than example FTM Sites 5-8 due to their location in more densely developed areas within the city limits of Paso Robles. It is assumed that encroachment permits would be obtained for any construction activities under Alternative BS-2 that may substantially impact the roadway.

Example FTM Sites 1-5 and 7 would be located within the LRA not mapped as VHFHSZ; therefore, these sites would have reduced potential for wildfire impacts. Example FTM Sites 6 and 8 would both be within the SRA HFHSZ, and thus would have elevated fire risk. Fire risk is a concern with BESS installations (particularly lithium-ion BESSs) and could pose a hazard to fire fighters and other first responders due to their chemical components. Fires associated with electric vehicles and various consumer electronics have shown that lithium-ion batteries have the potential to catch fire (Business Insider 2019; CNET 2016). Lithium-ion batteries contain a flammable electrolyte and have the potential for “thermal runaway,” which is a self-perpetuating cascade process where one compromised battery cell ignites adjacent cells, potentially resulting in a large-scale fire (SP Global 2019). Fires have occurred at utility-scale lithium-ion BESS installations, including one at the 2 MW BESS in Surprise, Arizona in April of 2019; however, utility-scale lithium-ion BESSs have been widely deployed in the U.S. (SP Global 2019; U.S. Energy Information Administration 2019). Improved safety standards are in development and safety certifications have been developed to reduce fire safety risk from lithium-ion BESSs as much as possible (SP Global 2019). Flow battery technology, which could be deployed at FTM Site 6, would have reduced fire risk because the electrolyte material is not flammable.

For construction activities at all FTM site examples, compliance with PRC and California Fire Code requirements (see Impact HAZ-7 for discussion) would reduce potential for accidental ignitions and for any accidental ignitions that do occur to develop into uncontrolled wildfires. Compliance with these existing laws and regulations would reduce wildfire hazard impacts during construction of BESSs. Once constructed, BESSs (in particular, lithium-ion BESSs) may

present a fire risk. UL 9540 is a safety standard specifically designed for electrochemical BESSs and includes, among other things, size and separation requirements to prevent a fire originating in one BESS unit from propagating to adjacent units (i.e., thermal runaway) (UL, LLC 2020). Implementation of this standard, along with compliance with local laws and regulations for fire safety, would reduce potential impacts from BESSs related to fire risk.

Overall, FTM BESS sites were selected for illustrative purposes only, BESS installations have not been designed and technologies have not been selected, and the specifics of Alternative BS-2 are unknown. Thus, project-level determinations cannot be made as impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is provided for any of the significance criteria.

Alternative BS-3: Third-Party, Behind-the-Meter Solar and Battery Storage

Construction of BTM solar and battery storage facilities would involve use of relatively small amounts of hazardous materials from operation of construction equipment. BTM solar and storage facilities also would contain hazardous materials (e.g., earth metals), which could pose a hazard primarily during their disposal or recycling at the end of the usable life of the equipment. Compliance with existing laws and regulations related to hazardous materials, including OSHA and Cal/OSHA requirements and RCRA requirements as implemented through the Unified Program, would reduce potential hazards to workers installing BTM facilities, members of the public, and the environment.

The specific locations of development sites under Alternative BS-3 are unknown; therefore, it is unknown whether they would occur in close proximity to schools, known hazardous materials sites, or airports. In general, however, BTM solar and storage facilities would be installed primarily within, or on, existing buildings and would consist of relatively small products that would not pose a hazard to surrounding land uses. While installation of BTM facilities may use equipment that could generate hazardous emissions (e.g., diesel particulate matter), these emissions would be short-lived, relatively minor in scale, and not dissimilar from emissions generated by any other type of construction project. Once installed, BTM solar and battery storage facilities would not generate hazardous emissions. Given that BTM facilities would be installed primarily within or on existing buildings, it is unlikely that such BTM facilities would be located on existing hazardous materials clean-up sites. Even if located on known hazardous sites, substantial excavation and ground-disturbance would not typically be needed for BTM facility installation, thereby reducing the potential for adverse effects. Rooftop solar arrays could increase the height of existing buildings by a small amount (less than 10 feet), but this would not pose a substantial hazard to aircraft above existing conditions.

Given the relatively small scale of BTM facility construction projects, substantial disruptions to existing traffic conditions during construction, such as to significantly adversely affect emergency response and evacuation procedures, are unlikely. In particular, installation of residential solar and battery storage facilities would involve localized effects from delivery trucks and construction worker vehicles accessing the premises. Similarly, most commercial and industrial BTM solar and battery storage facilities would not substantially affect roadways or emergency vehicle movement due to deliveries of materials at the site, and none of these projects would require lane or road closures.

Lithium-ion BTM storage facilities could pose a fire safety hazard (see discussion under Alternative BS-2 above), but, when installed properly, this risk can be greatly mitigated. It is assumed that all applicable local codes and requirements would be followed for the permitting, siting, and installation of third-party BTM facilities that may result from procurement via the DDF.

Overall, due to the fact that specific locations and characteristics of BTM resources procured under Alternative BS-3 are unknown at this time, project-level impact determinations are not possible as the impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is reached under any of the significance criteria.

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