3.8 HAZARDS AND HAZARDOUS MATERIALS

3.8.1 INTRODUCTION

This section describes existing conditions and potential impacts related to hazards and hazardous materials associated with construction, operation, and maintenance of the project. The analysis concludes that any impacts related to hazards and hazardous materials will be less than significant; the implementation of Applicant-Proposed Measures (APMs) described in Section 3.8.4.2 will further reduce less-than-significant impacts. The project's potential effects associated with hazards and hazardous materials were evaluated using the significance criteria set forth in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The conclusions are summarized in Table 3.8-1 and discussed in more detail in Section 3.8.4.

Would the project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			\boxtimes	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			\boxtimes	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				\boxtimes
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	oject located within an airport land use ere such a plan has not been adopted, miles of a public airport or public use uld the project result in a safety hazard residing or working in the project area?			
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				\boxtimes
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				\boxtimes

Table 3.8-1:	CEQA	Checklist for	Hazards and	Hazardous	Materials

Would the project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				

3.8.2 REGULATORY BACKGROUND AND METHODOLOGY

3.8.2.1 Regulatory Background

The use of hazardous materials and disposal of hazardous waste are subject to numerous laws and regulations at all levels of government. The following paragraphs contain an overview of pertinent regulations.

Federal

Resource Conservation and Recovery Act

Under the Resource Conservation and Recovery Act of 1976 (RCRA) (42 United States Code [USC] Section 6901 et seq.), individual states may implement their own hazardous waste programs in lieu of RCRA as long as the state program is at least as stringent as the federal RCRA requirements. The federal government approved California's RCRA program, called the Hazardous Waste Control Law (HWCL), in 1992.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC Chapter 103) and associated Superfund Amendments provide the U.S. Environmental Protection Agency (USEPA) with the authority to identify hazardous sites, to require site remediation, and to recover the costs of site remediation from polluters. CERCLA also enabled the revision of the National Oil and Hazardous Substances Pollution Contingency Plan, also known as the National Contingency Plan (NCP). The NCP provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants.

U.S. Department of Transportation Hazardous Materials Regulations

The U.S. Department of Transportation (DOT) Hazardous Materials Regulations (Title 49 Code of Federal Regulations [CFR] Parts 100–185) cover all aspects of hazardous materials packaging, handling, and transportation.

Federal Aviation Administration Regulations

The Federal Aviation Administration (FAA) must be notified of any structures located in the airspace of an airport, as defined in 14 CFR Section 77.9 (b)(1), (2), and (3), or new structures taller than 200 feet in height, to confirm that the proposed structures will not pose a threat to safety.

State

Hazardous Waste Control Law

The HWCL (California Health and Safety Code [HSC] Chapter 6.5 Section 25100 et seq.) authorizes the California EPA (Cal/EPA) and the Department of Toxic Substances Control (DTSC), a department within Cal/EPA, to regulate the generation, transportation, 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.

Hazardous Substance Account Act

The Hazardous Substance Account Act (HSAA) (California HSC Chapter 6.8 Section 25300 et seq.) is California's equivalent to CERCLA. It addresses hazardous waste sites and apportions liability for them. The HSAA also provides that owners are responsible for the cleanup of such sites and the removal of toxic substances, where possible.

The two state agencies with primary responsibility for enforcing federal and state regulations related to hazardous material transport and responding to hazardous materials transportation emergencies, are the California Highway Patrol and California Department of Transportation, respectively.

Occupational Health and Safety

The California Division of Occupational Safety and Health (Cal/OSHA) assumes primary responsibility for developing and enforcing workplace safety regulations within the state (California Code of Regulations [CCR] Title 8). Cal/OSHA standards are more stringent than federal Occupational Safety and Health Administration regulations, and take precedence.

Hazardous Materials Management

The California Office of Emergency Services is the state office responsible for establishing emergency response and spill notification plans related to hazardous materials accidents. Title 26 of the CCR is a compilation of the chapters or titles of the CCR that are applicable to hazardous materials management.

Porter-Cologne Water Quality Control Act

As discussed in more detail in Section 3.9, Hydrology and Water Quality, the Porter-Cologne Water Quality Control Act (California Water Code, Division 7) is the provision of the California Water Code that regulates water quality in California and authorizes the State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) to implement and enforce the regulations. The RWQCBs regulate discharges under Porter-Cologne primarily through the issuance of waste discharge requirements. Anyone discharging or proposing to discharge materials that could affect water quality must file a report of waste discharges. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. Porter-Cologne provides several means of enforcement, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecution. The project area is under the jurisdiction of the North Coast RWQCB.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (CCR Title 27) was mandated by the State of California in 1993. The Unified Program was created to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities for six hazardous materials programs. The program has six elements, including:

- Hazardous Waste Generators and Hazardous Waste On-site Treatment
- Underground Storage Tanks
- Aboveground Petroleum Storage Act
- Hazardous Materials Release Response Plans and Inventories
- California Accidental Release Prevention
- Uniform Fire Code Hazardous Materials Management Plans and Hazardous Materials Inventory Statements

At the local level, this is accomplished by identifying a Certified Unified Program Agency (CUPA) that coordinates all of these activities to streamline the process for local businesses. The Hazardous Materials Division of the Sonoma County Fire and Emergency Services Department is approved by Cal/EPA as the CUPA for Sonoma County.

Rules for Overhead Electric Line Construction

Under Section 35 of General Order 95, the California Public Utilities Commission (CPUC) regulates all aspects of design, construction, operation, and maintenance of electrical power lines and fire safety hazards for utilities subject to their jurisdiction.

Public Resources Code

Public Resources Code (PRC) Sections 4290–4293 identify construction, operation, and maintenance requirements to minimize fire hazards for structures located in State Responsibility Areas (SRAs).

- PRC 4290 was adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development of all residential, commercial, and industrial buildings in SRAs. Under PRC 4290, all residential, commercial, and industrial building construction within SRAs must provide for basic emergency access and perimeter wildfire protection measures, as specified in the code. Local standards that exceed those of PRC 4290 supersede PRC 4290.
- PRC Section 4291 addresses requirements for maintaining defensible space around buildings in SRAs.
- PRC Section 4292 addresses power line hazard reduction. It identifies the requirements for firebreaks around "any pole or tower which supports a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner pole" in wildland areas.
- PRC Section 4293 provides specific clearances for power lines in wildland areas.

Fire Prevention Standards for Electric Utilities

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

California Fire Code

The California Fire Code 2010 (CCR Title 24, Part 9) is based on the International Fire Code from the International Code Council and contains consensus standards related to establishing good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new or existing buildings, structures, and premises.

California Department of Forestry and Fire Protection Forest Practice Rules

California Department of Forestry and Fire Protection's (CAL FIRE) Forest Practice Rules 2013 (CCR Title 14, Article 8, Fire Protection) address fire prevention in forested areas. These rules were developed to address fire protection requirements during logging operations, but also apply to tree-cutting during PG&E construction projects in forested areas.

Local

Because the CPUC has exclusive jurisdiction over the siting, design, and construction of the project, the project is not subject to local discretionary regulations. This section provides information on adopted airport land use plans and adopted emergency response plans or evacuation plans for informational purposes and to assist with CEQA review.

Airport Land Use Plans

The project site is located approximately 2.3 miles east of the Charles M. Schulz - Sonoma County Airport (Sonoma County Airport). The project is outside of the 2001 Comprehensive Airport Land Use Plan Safety Zones. An updated 2030 Airport Master Plan for the Sonoma County Airport which would extend the runways on the north side of the airport was approved in 2012, and amendments to the County's Comprehensive Airport Land Use Plan are currently under consideration by Sonoma County Airport Land Use Commission. The project is outside of the draft Recommended Safety Zones in the proposed amendment (Sonoma County 2015).

Adopted Emergency Response Plans/Evacuation Plans

Emergency plans in effect in the project area include the Sonoma County Hazard Mitigation Plan (SCHMP). The SCHMP was originally developed and adopted in 2006, and was updated and adopted by the Sonoma County Board of Supervisors in October 2011. The SCHMP identifies high hazard areas and, throughout its 5-year implementation plan, assesses vulnerabilities from earthquakes, floods, wildland fires, and landslides. The SCHMP was created in coordination with the Board of Supervisors, the Fire and Emergency Services Department, and the Permit and Resource Management Department. Furthermore, the SCHMP is incorporated by reference into the General Plan 2020 Public Safety Element, and is considered consistent with various implementation programs within the element. The SCHMP assesses community vulnerability and mitigation capabilities, and provides mitigation strategies.

3.8.2.2 Methodology

The methodology for analyzing impacts from hazards and hazardous materials includes identifying general types of hazardous materials and activities used during project construction, operation, and maintenance. Potential impacts on the environment and public health from hazards and hazardous materials were further evaluated using information about the existing uses of the project site and adjacent properties, historical uses, and known contamination, to determine the likelihood of encountering hazardous materials.

A report was obtained from Environmental Data Resources, Inc. (EDR) (EDR 2015) and reviewed to screen for hazardous waste sites in the project area. The EDR report includes information on sites within one mile of either side of the project area that were identified in federal, state, and local databases related to hazardous materials and wastes, and maps showing the locations of these sites. The database search process reviews multiple lists for historically contaminated properties and businesses that use, generate, or dispose of hazardous materials or petroleum products in their operation. In addition, the EDR search reviews lists of active contaminated sites that are currently undergoing monitoring and remediation.

As specified by CEQA significance criterion (d) (see Table 3.8-1), the EDR report was used to identify sites along the routes that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List). Because the Cortese List is no longer specifically updated by the state, those requesting a copy of the Cortese List are now referred directly to the appropriate information resources contained on the websites of the boards or departments that are referenced in the statute. Therefore, the EDR report's listing of Cortese List sites was supplemented by reviewing the following:

- Sites listed on DTSC's Envirostor database (DTSC 2015)
- Sites listed on the SWRCB's GeoTracker database (SWRCB 2015)
- SWRCB lists of sites with reported waste constituents above hazardous waste levels outside the waste management unit; with active Cease and Desist Orders and Cleanup and Abatement Orders for hazardous wastes; or identified by DTSC as subject to corrective action pursuant to Section 25187.4 of the California HSC (Cal/EPA 2012)

The EDR report was also used to screen for nearby hazardous waste sites that could potentially affect the project based on the significance criteria summarized in Table 3.8-1.

The potential for activities and equipment to pose fire hazards was evaluated through review of state fire hazard maps (CAL FIRE 2007).

3.8.3 ENVIRONMENTAL SETTING

The project area is located in in central Sonoma County, California. The project alignment is a 9.9-mile-long section of the Fulton-Hopland 60 kilovolt (kV) Power Line between Fulton Substation and Fitch Mountain #1 Tap, and consists of two segments: (1) Fulton-Shiloh and (2) Shiloh-Fitch. The project is located east of the Town of Windsor and City of Healdsburg on the eastern margin of the Santa Rosa Valley. The approximately 1.8-mile-long Fulton-Shiloh

segment, which extends from Fulton Substation to an existing pole located in the southwest corner of Shiloh Ranch Regional Park, traverses predominantly urban and rural residential land uses. The approximately 8.1-mile-long Shiloh-Fitch segment runs north through vineyards, rangeland, woodland, agricultural lands, and land designated for resources and rural development; however, some portions of the alignment cross residential areas and land designated for public facilities. Fitch Mountain Substation is an existing substation east of Healdsburg and south of the Russian River.

3.8.3.1 Schools

The nearest schools to the Fulton-Shiloh segment of the project area are Mark West Elementary School, Mark West Charter School, and San Miguel Elementary School. Mark West Elementary School is located across the street from the Fulton-Shiloh segment, on Lavell Road. Mark West Charter School is located on the San Miguel Elementary School campus, which is crossed by the Fulton-Shiloh segment along Faught Road. The After School Arts Program at The Cove is located approximately 200 feet from the project on Old Redwood Highway. Schools within the project vicinity are shown on Figure 3.10-1: General Plan Land Use Designations Map.

3.8.3.2 Existing Hazardous Materials/Sites

The SWRCB GeoTracker online database did not identify any open leaking underground storage tank (LUST) contamination sites within 0.25 mile of the project alignment. One open LUST case was discovered within 0.5 mile of the project alignment. The case is listed as Fast & Easy Mart (Case# T0609700430), at 5231 Old Redwood Highway, Santa Rosa, California (along the Fulton-Shiloh segment), for potential gasoline in soil and groundwater. The listing indicated that two 10,000-gallon underground storage tanks (USTs) were removed from the site in 1995. A groundwater monitoring program was initiated in 1998. Investigation was conducted from 1998 to 2006. However, due to the distance from the alignment, and the fact that only minimal excavation activities will occur for placement of poles and footings, the property described in the listing is not anticipated to affect the project.

The DTSC EnviroStor online database did not identify any open contamination sites within 0.25 mile of the project alignment.

The EPA EnviroMapper database (EPA 2015) did not indicate any small-quantity hazardous waste generators located within 0.25 mile of the project alignment.

No large-quantity hazardous waste generators or Superfund sites are located within 0.25 mile of the project alignment.

An EDR Corridor Study conducted for hazardous waste sites identified 21 listings within 1 mile of the project. All of the listings were administrative in nature, apart from the previously described Fast & Easy Mart open LUST case (Case# T0609700430).

3.8.3.3 Wildland Fire Hazards

Sonoma County

As defined by CAL FIRE, the Fulton-Shiloh segment is located outside of an SRA¹ or a Local Responsibility Area (LRA), with the exception of the last 0.25 mile at the northern end of the segment, which is located in an LRA, rated as a moderate fire hazard severity zone.

The Shiloh-Fitch segment is located within a SRA, with the exception of an approximately 0.5mile-long segment that is located in an LRA, rated as a moderate fire hazard severity zone (CAL FIRE 2009). Within the SRA, the majority of the project area is located in a moderate fire hazard severity zone (CAL FIRE 2007), as shown in Figure 3.8-1: Fire Hazard Severity Map.

Fitch Mountain Substation is not located within an SRA or LRA.

Fire protection services and equipment near the project alignment are discussed in detail in Section 3.14, Public Services.

3.8.4 APPLICANT-PROPOSED MEASURES AND POTENTIAL IMPACTS

The following sections describe significance criteria for impacts related to hazards and hazardous materials derived from Appendix G of the CEQA Guidelines, provide APMs, and assess potential project-related construction and operational impacts related to hazards and hazardous materials.

3.8.4.1 Significance Criteria

According to Section 15002(g) of the CEQA Guidelines, "a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project." As stated in Section 15064(b) of the CEQA Guidelines, the significance of an activity may vary with the setting. Per Appendix G of the CEQA Guidelines, the potential significance of project impacts related to hazards and hazardous materials were evaluated for each of the criteria listed in Table 3.8-1, as discussed in Section 3.8.4.3.

3.8.4.2 Applicant-Proposed Measures

PG&E will implement the following APMs:

APM HM-1: Worker Environmental Training Program

An environmental training program will be established to communicate environmental concerns and appropriate work practices to all construction field personnel. The training program will emphasize site-specific physical conditions to improve hazard prevention, and will include a review of the Stormwater Pollution Prevention Plan (SWPPP), which will also address spill response. The worker environmental training program will be provided separately to CPUC staff prior to construction.

¹ SRAs are the areas where the State of California is financially responsible for preventing and suppressing wildfires. SRAs do not include lands within city boundaries or in federal ownership.



APM HM-2: Fueling of Helicopters

Any fueling of helicopters will occur in designated project landing zones, and will comply with the following PG&E guidelines:

- Any on-site fuel necessary for equipment operation will be placed in appropriate storage tanks on the bed of fueling vehicles.
- Bulk lubricating oil, hydraulic fluids, and other materials used for vehicle and equipment maintenance will not be stored on the construction site.
- Minor amounts of lubricants and hydraulic fluid will be stored in vehicles.
- Secondary containment and spill rags will be used when fueling.
- "Topping-off" fuel tanks will be discouraged.
- A stockpile of absorbent material will be placed where it will be readily accessible.
- All fuel trucks and fueling areas will be required to have spill kits.
- Absorbent material will be used on small spills. The absorbent material will be removed promptly and disposed of properly.
- Vehicles and equipment will be checked regularly for leaking oils and fuel.

Further, PG&E will adhere to the U.S. DOT helicopter safety guidelines.

APM HM-3: Smoking and Fire Rules

Smoking will not be permitted during fire season, except in a barren area that measures a minimum of 10 feet in diameter and is cleared to mineral soil, or within vehicles or enclosed equipment cabs. Under no circumstances will smoking be permitted during fire season while employees are operating light or heavy equipment, or while walking or working in grass and woodlands.

APM HM-4: Carry Emergency Fire Suppression Equipment

PG&E construction crew trucks and equipment will have, at a minimum, a standard roundpoint shovel and a fire extinguisher. If construction activities likely to cause sparks (e.g., welding, grinding, or grading in rocky terrain) are conducted, emergency fire tool boxes will be readily available to crews. The tool boxes will contain fire-fighting items such as shovels, axes, and water.

3.8.4.3 Potential Impacts

Project impacts related to hazards and hazardous materials were evaluated against the CEQA significance criteria and are discussed below. The impact analysis evaluates potential project impacts during the construction phase and the operation and maintenance (O&M) phase.

The project includes reconductoring existing 60 kV and 230 kV electric utility lines between Fulton Substation and Fitch Mountain #1 Tap. The O&M activities required for the reconductored power and transmission lines will not increase from those currently required for the existing system; thus, no operation-related impacts related to hazards and hazardous materials will occur. Therefore, the impact analysis is focused on construction activities that are

required to install the new conductor, replace and remove poles, perform minor substation modifications, and establish required access and work areas, as described in Chapter 2.0, Project Description.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? *Less-than-Significant Impact*

The project will not create a hazard to the public or the physical environment through the routine transport, use, or disposal of hazardous materials. Other than substances associated with construction vehicles and equipment (e.g., fuels, oils, lubricants, and solvents), no hazardous materials will be associated with project construction. PG&E will follow its existing programs to reduce the potential for a spill during construction, or exposure of workers or the public to hazardous materials. Minor spills or releases of hazardous materials could occur due to improper handling and/or storage practices during construction activities. With implementation of APM HM-1, a training program will emphasize hazard prevention and review of the SWPPP.

With implementation of APM HM-2, fueling of helicopters will occur in designated project landing zones and will comply with the PG&E guidelines outlined in the APM. Impacts from the transport, use, and disposal of hazardous materials during construction will be less than significant. Implementation of PG&E's existing plans and APMs HM-1 and HM-2 will further reduce less-than-significant impacts.

Removed wood poles will be temporarily staged in specific containers at a PG&E service center that has been designated as a PG&E consolidation site. As containers are filled, poles will be scheduled for transport to an appropriate licensed Class 1 or composite-lined portion of a solid waste landfill, likely either the Recology Hay Road Landfill in Vacaville, California or Forward, Inc. Waste Disposal in Manteca, California. These facilities have no disposal capacity issues associated with the treated wood poles generated by this project.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? *Less-than-Significant Impact*

Project construction will require the use of motorized heavy equipment, such as all-terrain vehicles, backhoes, graders, pickup trucks, line trucks, bucket trucks, and helicopters. During construction activities, an increased potential will exist for an accidental release of fluids from a vehicle or motorized piece of equipment. However, the effects will not be substantial because of the limited amounts and types of hazardous materials proposed for use during construction. No bulk aboveground storage tanks or 55-gallon drums will be used on site for fueling or maintenance purposes. No hazardous substances, such as diesel fuel and unleaded gasoline, will be stored on site overnight. Vehicles will be fueled at commercial or PG&E fueling stations; no vehicles will be refueled on site. Large equipment will be driven to the project site once and staged at project work areas until work is complete. Helicopters will not be left overnight at the project site, and will be refueled at landing zones or hangars. With implementation of APMs HM-1 and HM-2, along with APM WQ-1 (which is described in Section 3.9, Hydrology and Water Quality), PG&E will further reduce the less-than-significant impact from upset or accidental spills of hazardous materials during construction.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? *Less-than-Significant Impact*

Three schools and one childcare facility are located within 0.25 mile of the Fulton-Shiloh segment. Potential construction-related impacts are associated with equipment that uses hydraulic fluids and fuels, and could create a hazard in the event of a spill. However, with implementation of the APMs related to minimizing the impacts of hazardous materials during construction (APMs HM-1 and HM-2), potential impacts related to the three nearby schools and one childcare facility will be less than significant.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? *No Impact*

The EDR Corridor Study, DTSC EnviroStor online database, and SWRCB Geotracker online database indicated that no active hazardous waste sites are located within 0.25 mile of the project.

The nearest open hazardous waste site is located approximately 0.5 mile from the Fulton-Shiloh segment. The case is listed on the EDR report and Geotracker online database as Fast & Easy Mart, and is a LUST case for potential gasoline in soil and groundwater from two 10,000 gallon USTs. However, according to case summary reports, the USTs were removed from the site in 1995, and a groundwater monitoring program was initiated in 1998. Investigation was conducted from 1998 to 2006. Reports indicated that the extent of the plume has been characterized, and that shallow groundwater flow at the case site is towards the northwest, away from the project alignment. Furthermore, no excavation activities will be conducted along this segment. Because the listing is not located within close proximity to the project alignment or project excavation, the LUST site has been adequately characterized, and the flow of shallow groundwater is away from the project alignment, the project is not anticipated to impact the site; therefore, no impact will occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? *Less-Than-Significant Impact*

The project is located approximately 2.3 miles northeast of the Sonoma County Airport. It is not located within the existing or proposed Comprehensive Airport Land Use Plan Safety Zones. Replacement poles will, on average, be approximately 20 feet taller than the existing poles. Based on a review of the FAA's Notice Criteria Tool, most replacement poles exceed the Notice Criteria specified in FAA Regulations and Title 14 CFR, Section 77.9. PG&E has submitted the required Notice of Proposed Construction and Alteration Application to the FAA and received a Notice of Determination from the FAA that the proposed replacement poles do not exceed obstruction standards and would not be a hazard to air navigation. PG&E will implement any measures required by the FAA, and will coordinate with local airports regarding helicopter operations and flight plans during project construction. Helicopter flight paths during construction will generally be limited to the existing utility line right-of-way and project-specific landing zones. Helicopter use will be in accordance with all applicable federal, state, and local

aviation rules and regulations, and will not create any new hazards. Because PG&E will adhere to all aviation rules and regulations and coordinate helicopter operations with the Sonoma County Airport, there will be no safety hazard for people residing or working in the area. Therefore, the impact will be less than significant.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? *No Impact*

No private airstrips are located in the project vicinity. Thus, no impact will occur.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? *Less-than-Significant Impact*

Use of public roadways by construction vehicles for project access and materials transportation could potentially briefly interfere with emergency routes in the immediate area by disrupting traffic flow if temporary road closures or lane diversions are necessary. The area of primary concern would be the Fulton-Shiloh segment of the project, as it runs through the Larkfield-Wikiup residential neighborhood. As described in Section 3.16, Transportation and Traffic, PG&E will coordinate with emergency service providers prior to any road closures or lane diversions to avoid or minimize potential impacts on response times. The project's impact would therefore be less than significant.

h) Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? *Less-than-Significant Impact*

The majority of the project is located within a CAL FIRE moderate fire hazard severity zone, as shown in Figure 3.8-1: Fire Hazard Severity Map. Heat or sparks from vehicles or equipment have the potential to ignite dry vegetation and cause fires. However, project activities will generally be confined to areas that have been cleared of vegetation, including access roads and work areas. Vehicles and equipment will access project construction areas for poles by using existing paved, dirt, and/or gravel roads and overland travel routes, all of which will be cleared of brush to reduce fire potential. In addition, as described in APM HM-3 and APM HM-4, PG&E will require construction personnel to adhere to fire prevention practices, such as only smoking in designated areas and keeping appropriate fire-fighting equipment on site. As a result, the potential for fire from construction of the project will be less than significant.

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