3.6 HAZARDS AND HAZARDOUS MATERIALS

This section of the Environmental Impact Report (EIR) describes the existing conditions related to hazards and hazardous materials in the vicinity of the Project site and analyzes the potential for hazards and hazardous materials impacts to occur as a result of implementation of the Avila Ranch Development Project (Project), as well as airport-related hazards. Any land use conflicts with Airport Land Use Plan (ALUP) Safety Areas or the Airport Overlay Zones (AOZs) of the City of San Luis Obispo's (City) are further discussed in Section 3.8, *Land Use and Planning.*

Hazards may include exposure to both natural and man-made hazards. These could include hazards associated with aircraft operations at the nearby San Luis Obispo County Regional Airport (Airport) or natural hazards such as wildfires. Hazardous materials are defined as substances with physical and chemical properties of ignitability, corrosivity, reactivity, or toxicity, which may pose a threat to human health or the environment. To clarify, the term "hazardous materials" is used in this section to generally describe chemical materials, such as petroleum products, solvents, pesticides, herbicides, paints, metals, asbestos, and other regulated chemical materials. Additionally, the term "release" as used in this section includes known historical spills, leaks, illegal dumping, or other methods of release of hazardous materials to soil, sediment, groundwater, or surface water. If a historical release exists, then there is a risk associated with disturbing the historical release area. Potential future releases of hazardous materials that could occur during construction or operation of the Project facilities also are included in the analysis.

Information for this section was gathered from Environmental Site Assessments (ESAs) and EIRs prepared for adjacent properties such as the Chevron Tank Farm property, information provided by the City's General Plan Safety Element, Airport Specific Plan (AASP), ALUP, and Project site information on file with the City. Additionally, site-specific hazardous materials information was provided in a Preliminary Site Assessment (PSA) and Phase II Addendum for the Avila Ranch Property, and soil engineering studies prepared for the Project site (Grisanti & Associates 2011; GeoSolutions, Inc. 2015a; see Appendix L).

3.6.1 LUCE Update EIR

The 2014 Land Use and Circulation Elements (LUCE) Update EIR previously analyzed hazards and hazardous materials impacts related to adoption and implementation of the 2014 LUCE. The LUCE Update EIR identified potentially significant impacts to hazards

associated with potential future development of the Project site due to the potential for airport land use incompatibility and introduction of residential uses to high wildland fire hazards; however, the EIR concluded that implementation of the existing General Plan policies, would reduce impacts to a less than significant level. In particular, LUCE Chapter 7, Airport Areas policies were found to mitigate potential impacts (City of San Luis Obispo 2014).

3.6.2 Environmental Setting

The Project site is located in the southern area of the City within a region that transitions from urban industrial to agriculture and rural development. Industrial uses lie to the north and northwest of the Project site, while agricultural uses are adjacent to the south and southeast within unincorporated County areas. The nearest schools to the Project site are located over 2 miles away. The Airport is approximately 0.6 mile east of the Project site.

The Chevron Tank Farm property lies to the northeast of the Project site and is a location of previous releases of hazardous materials, most notably the release of petroleum that resulted from the Unocal Tank Farm fire of 1926. This is discussed in detail below.

The Project site has been in long-term agricultural use and is largely undeveloped. The onsite agricultural operations involve the routine use and handling of hazardous materials such as fertilizers, pesticides, and herbicides. Historical aerials indicate that the site was developed with a ranch-style farm house and agricultural accessory structures near the center of the Project site. These structures have since been demolished.

3.6.2.1 Wildfire Risk

In central California, the fire season usually extends for approximately five to six months, from late spring to fall, or roughly May through October. The duration of the fire season is influenced by a combination of climatic, vegetative, and physiographic conditions; rainfall totals, distribution and/or drought conditions may affect the duration of this period. Structural losses or damage from wildfires can be caused directly due to wildland fires, but also often result from

The Project site is within a Moderate Wildland Fire Hazard Zone and contains open grasslands and riparian vegetation that present moderate wildfire hazards.

inappropriate siting of structures, use of inappropriate construction materials, flammable ornamental landscaping, and accessory structures.

Wildfire hazard zones are assessed by the California Department of Forestry and Fire Protection (CALFIRE) based on the presence of fire-prone vegetation, climate, topography, assets at risk (e.g., high population centers), and a fire protection agency's ability to provide service to the area. The Project site is designated as a Moderate Wildland Fire Hazard Zone (CALFIRE 2007). As the Project is located at the edge of a rural area, it has potential to be exposed to wildfire hazards. Within the Project vicinity, vegetation such as open grasslands on and adjacent to the site and riparian vegetation such as that along Tank Farm Creek, can quickly burn during the dry fire season, particularly under strong wind conditions.

3.6.2.2 Hazardous Materials

Potential for Hazardous Materials on the Project Site

The Project site supports existing agricultural operations and is adjacent to active agricultural operations to the south and east. Typical hazardous materials in use on agricultural lands include lubricants, fuels, fertilizers, and pesticides. Production and storage of these chemicals can pose potential hazards where leaks can contaminate air, water, and soil, or generate fire. Areas on agricultural lands that are of particular concern for these hazardous materials are farming headquarters or staging areas in which operations are conducted and where hazardous materials or equipment might have been stored. At the Project site, the PSA inspection of the location of the previous farm headquarters area showed no evidence of storage or use of hazardous materials. Further, inspection of the other possible staging areas showed no visual evidence of pesticides, fuels or other hazardous substance releases or spills (Grisanti & Associates 2011).

However, as a result of historical agricultural operations within the Project site, there is potential for pesticides and herbicides to be present in low concentrations near the soil surface. These chemicals are not usually regulated by government agencies and the PSA indicates there is little risk associated with residual presence of pesticides in site soils (Grisanti & Associates 2011). During the PSA survey, inspection of the Project site revealed minimal presence of some non-hazardous solid waste from residual homeless campsites adjacent to Tank Farm Creek, in addition to a small pile of refuse near where a former windmill once stood (Grisanti & Associates 2011).

Additionally, a reuse dump associated with an old farm house from the early 1900s was located onsite during inspections in 2011. The PSA notes the most significant waste from

the old farm house includes some plaster and some asphalt shingle roofing. The old farm house refuse onsite may have contained asbestos containing materials (ACM). Based on the age of the building, there is a potential for building materials to have contained ACM or lead-based paint (LBP). When ACM or LBP are disturbed during renovation or demolition activities, there is a potential to release these hazardous materials, which can be harmful to human health. Two empty 5-gallon containers were also found during the PSA, one of which might have contained a lubricant or some other agricultural chemical. Both containers were deemed free of any previous residual chemicals and could be disposed as non-hazardous waste (Grisanti & Associates 2011). According to the PSA, what waste was present does not pose a significant disposal liability. The PSA also notes that Mr. Avila has already arranged provisions for the cleanup of the farm house waste (Grisanti & Associates 2011). During site inspections conducted by Amec Foster Wheeler in 2016, this refuse had appeared to be removed.

Radon is considered to have a moderate risk in some geologic formations and soils in San Luis Obispo County. Within the region, only 3 of 173 tests for radon in homes contain over 4pCi/L, 'the highest' rating. The PSA indicates there is little risks associated with presence of radon within the Project site (Grisanti & Associates 2011).

The PSA also noted the presence of a transformer on one of the Pacific Gas and Electric Company (PG&E) power poles that run along the north-central property line that could possibly contain polychlorinated biphenyls (PCBs). As indicated by the PSA, the PG&E transformer is not expected to contain PCBs as PG&E discontinued use of PCBs in transformers in the 1980s (Grisanti & Associates 2011).

Hazardous Materials Site Listings

No evidence of aboveground storage tanks (ASTs) or underground storage tanks (USTs) is known to occur within the Project site. In addition to the lack of ASTs and USTs, the Project site is not currently or has not historically been associated with any bulk fuel storage or fixed dispensing equipment (Grisanti & Associates 2011; Department of Toxic Substances Control [DTSC] 2016).

However, records indicate that several permitted USTs, inactive Leaking Underground Storage Tanks (LUSTs) and Cleanup Program sites are located within 0.5 mile of the Project site (see Table 3.6-1; DTSC 2016). There are five active cleanup sites that were identified within 0.5 mile of the site; three within the Chevron Tank Farm property to the

Table 3.6-1. USTs and Cleanup Sites within a 0.5 mile-Radius of the Project Site

Hazardous Site Record	Location	Potential for Migration to the Project site
PG&E Permitted UST	Vachell Lane, 1,100 feet east of Project site	Very Low – Listed site does not indicate release of hazardous materials.
Pacific Bell Permitted UST	Tank Farm Road, 0.5 mile north of the Project site	Very Low – Listed site does not indicate release of hazardous materials.
Pacific Bell Inactive LUST Inactive Cleanup site	Suburban Road, 0.3 mile north of the Project site	Very Low – Two inactive cleanup sites included a release of diesel and gasoline in 1995 and 2003 that potentially affected groundwater supplies. Cleanup was completed in 2004. Given its inactive status, potential contamination of the Project site is very low.
Chevron Tank Farm Cleanup Program Site	Tank Farm Road, 100 feet north of the Project site	Low – Active cleanup site since 1998 for crude oil, petroleum, arsenic, lead, and asphalt that contaminated groundwater, soils, and surface water. Groundwater monitoring conducted since 1998 indicates that contamination is limited to a plume contained within the site. The site is part of Chevron Tank Farm property remediation activities.
Unocal Pipeline Cleanup Program Site	Tank Farm Road, 0.5 mile north of the Project site	Low – Active cleanup site since 1991. Crude oil from the pipeline potentially contaminated groundwater supply. The site is part of a groundwater monitoring program.
San Luis Truck Service Garage LUST	Tank Farm Road, 0.5 mile north of the Project site	Low – Groundwater and soil contamination from release of solvents and gasoline. The site is part of a groundwater monitoring program.
Unocal Pipeline Inactive Cleanup Program Site	South Higuera Street, 883 feet west of the Project site	Very Low – Soil and groundwater was contaminated with non-petroleum hydrocarbons in 1998. Groundwater monitoring was performed between 2004 and 2015 and indicates that contamination is confined within an area along South Higuera Street. Chevron developed a soil and groundwater management plan.
San Luis Obispo Perchloroethylene (PCE) Plume DTSC Cleanup Site	Los Osos Valley Road, 0.5 mile northwest of the Project site	Low – Active cleanup site since 2010. Groundwater was potentially impacted by tetrachloroethylene from the site's previous dry-cleaning use.

Table 3.6-1. USTs and Cleanup Sites within a 0.5 mile-Radius of the Project Site (Continued)

Hazardous Site Record	Location	Potential for Migration to the Project site
Los Osos Valley Road Cleanup Site	Los Osos Valley Road, 0.5 mile northwest of the Project site	Low – Active cleanup site since 2010. Soils were contaminated with crude oil, diesel and gasoline. Due to the distance and potential for soil to migrate, potential for migration to the Project site is low.

Source: DTSC 2016; Grisanti & & Associates 2011.

north, and two along Los Osos Valley Road to the northwest. These sites are undergoing remediation for contaminants that affected soils, groundwater, and surface water. Records indicate these sites are undergoing groundwater monitoring and soil sampling programs and contamination has been isolated to the sites.

These offsite cleanup sites located near the Project site or hydraulically up-gradient could be a concern if contaminants migrate to the Project site. Given the location of the sites and soil and groundwater affected, there is a low potential for migration of contaminates to the Project site, in particular, to groundwater resources (Grisanti & Associates 2011). This is further described below.

The 1926 Unocal Fire and Potential for Total Petroleum Hydrocarbons

The largest historical hazardous materials release in the Project vicinity occurred during the 1926 Unocal Tank Farm fire. After a lightning strike hit the facility, it caused a massive fire resulting in the burning and release of an estimated 6 million barrels of oil (Applied EarthWorks, Inc. 2015). Hot crude oil was estimated to have flowed over the northern part of the Project site. According to the PSA, the majority of residue from the spill was removed by the family owner/operators and disposed offsite soon after the spill; however, during PSA sampling, total petroleum hydrocarbons (TPH) remnant from the 1926 fire was recovered in soils in the northeastern portion of the Project site near its boundary with the Chevron Tank Farm property. Relatively shortly after the release, historical aerials indicate the Project site remained in active agricultural use by the Avila family from 1939 to 2006. Since the spill, numerous studies have been conducted on the Chevron Tank Farm property and results conclude that contamination appears to remain contained on the Chevron Tank Farm property (Grisanti & Associates 2011).

Testing for the PSA indicated that groundwater and soil samples showed relatively minor amounts of heavy petroleum hydrocarbons still exist in the northeast corner of the Project

site, directly south of the common border of the Chevron Tank Farm property. The levels of which TPH are detected are in smaller concentrations the farther the distance to the Chevron Tank Farm property. Collected samples registered TPH as high as 220 parts per million (ppm) and low as 41 ppm. The PSA indicated the hydrocarbon presence does not pose any significant health or environmental concerns (Grisanti & Associates 2011).

Naturally Occurring Asbestos

The Buckley Road Extension Soils Engineering Report suggests that naturally occurring asbestos (NOA) could occur within the serpentine rock found during field exploration of the Buckley Road Extension site (GeoSolutions, Inc. 2015). The existing structures within the Buckley Road Extension site may also contain ACMs.

3.6.2.3 Airport Safety Hazards

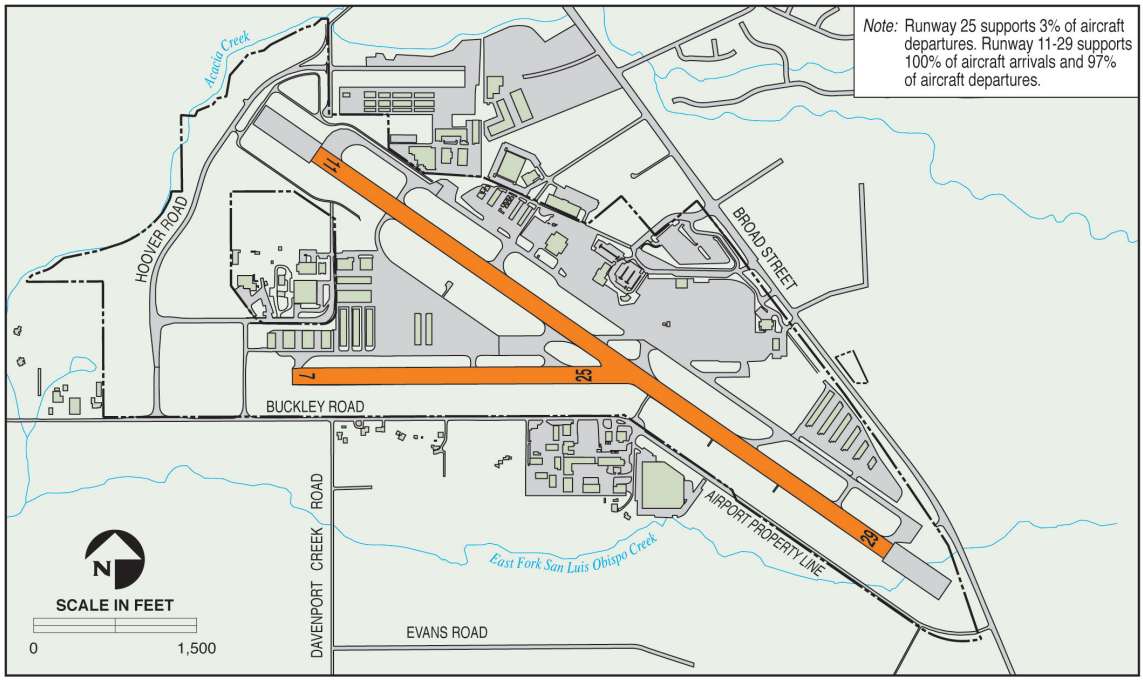
The Project site is approximately 0.6 mile west of the Airport and falls within the jurisdiction of both the ALUP adopted by the Airport Land Use Commission's (ALUC) in 1973 and updated in 2005, as well as the City's AOZs addressed in Chapter 7 of the City's 2014 LUCE Update, regarding airport safety issues.[1] Both documents put forth standards for development intensity within airport safety zones, and identify potential airport safety hazards using similar, but different criteria governing allowable types and intensity of future development and the location of safety zones based on differences in mapping. The County ALUC oversees development subject to the ALUP to ensure safety, while the City has ultimate jurisdiction over potential land use decisions and future development. This section briefly describes the operations at the Airport and associated physical safety hazards associated with the Project site in terms of both the ALUP and LUCE safety standards. A more detailed description of the standards for allowable development intensity within the ALUP Safety Areas and LUCE AOZs, along with associated land use impacts are described in Section 3.8, *Land Use and Planning.*

San Luis Obispo County Regional Airport

The Airport provides commuter, charter, and private aviation service to the area. The primary hazard associated with land uses near the Airport is the risk of aircraft incidents on approach and takeoff. Aircraft flight operations are determined largely by the physical layout of the Airport and rules of the Federal Aviation Administration (FAA) (City of San

[1] As noted in Section 3.8, *Land Use and Planning*, the ALUP is currently undergoing an update which is expected to be completed in 2017.

Luis Obispo 2014). The Airport has had a mix of commercial airline service and general aviation operations for most of its history. At the time of the SBP Master Plan Update (adopted in 2005), business aviation accounted for approximately 5 percent of general aviation operations, with the majority of general aviation operations being flight training and leisure flying. The split of general aviation operations at the Airport averaged 60 percent itinerant and 40 percent local, and military operations accounted for less than 1 percent of total operations. Enplaned air cargo at the Airport was growing at an average annual rate of 2.4 percent (Johnson Aviation 2014). In 2015, the split of general aviation operations averaged 66 percent itinerant and 34 percent local, with military operations accounting for less than 1 percent of total operations (San Luis Obispo County Regional Airport 2015).



amec foster wheeler

San Luis Obispo County Regional Airport

FIGURE 3.6-1

There are two runways at the Airport (see Figure 3.6-1). Runway 11-29 is utilized for the majority of aircraft operations, with 97 percent of all aircraft operating at the Airport using this runway for departures and arrivals, as well as touch-and-go flights. Runway 7-25 is mostly used by small, light, general aviation aircrafts during crosswind conditions and is utilized for the remaining 3 percent of aircraft flights, only for General Aviation propeller

aircraft.[2] Both runways have parallel taxiways (Johnson Aviation 2014). The Project site is located in the path of the arrival/departure pattern for Runway 7-25, the runway with the lowest level of use.

Aviation Accidents at San Luis Obispo County Regional Airport

According to the California Airport Land Use Planning Handbook Accident Study, 68 percent of aviation accidents occur over or within an airport, and accident sites tend to occur fairly close to the extended runway centerline (Johnson Aviation 2014). There had been a total of 33 aviation accidents or incidents associated with the Airport, six of which resulted in fatalities, between 1984 and 2014. Of these, five incidents resulting in emergency landings within LUCE-defined AOZs between 1984 and 2014, none of which resulted in an on-ground fatality or occurred within or adjacent to the Project site (see Table 3.6-2).

Table 3.6-2. Fatal Aircraft Accidents within the Vicinity of San Luis Obispo County Regional Airport

Approximate Location of Crash Site within AOZ and/or ALUP Safety Areas		
Flight Date	AOZ area	ALUP Safety Area
9/24/1990	n/a	S-2
8/7/1994	AOZ-4	S-1B
1/16/2001	AOZ-6	S-1C
8/1/2005	AOZ-6	S-2
6/24/2013	AOZ-2	S-1B

Source: Johnson Aviation 2014.
Note: Accident site placement for repsective AOZ and ALUP Safety Areas were based on visual determination of Figure 4-3 from the *Johnson Aviation Land Use Compatibility Report.*

3.6.3 Regulatory Setting

3.6.3.1 Federal

Comprehensive Environmental Response, Compensation, and Liability Act (1980)

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) addresses procedures to identify and cleanup sites contaminated by unauthorized releases of hazardous materials. Commonly known as Superfund, CERCLA was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to

[2] General aviation is all civil aviation operations other than scheduled air services and non-scheduled air transport operations for remuneration or hire.

releases or threatened releases of hazardous substances that may endanger public health or the environment. Superfund sets priorities for cleanup in the National Oil and Hazardous Substances Pollution Contingency Plan (National Contingency Plan). The National Contingency Plan includes lists of abandoned and uncontrolled hazardous waste sites, which the Environmental Protection Agency (EPA) updates annually.

Under CERCLA, owners and operators of real estate where there is hazardous substance contamination may be held strictly liable for the costs of cleaning up contamination found on their property. No evidence linking the owner/operator with the placement of the hazardous substances on the property is required.

Clean Water Act (1977)

The Clean Water Act governs the control of water pollution in the U.S. This Act implements the National Pollutant Discharge Elimination System (NPDES) program, which requires that permits be obtained for point discharges of wastewater. This Act also requires that storm water discharges be permitted, monitored, and controlled for various entities.

The Central Coast Regional Water Quality Control Board (RWQCB) oversees onsite treatment of "California Designated, Non-Hazardous Waste." The Central Coast RWQCB enforces water quality thresholds and standards set forth in the Basin Plan through the project permitting process. The RWQCB requires project applicants to obtain a General Construction Activities Stormwater Permit under the NPDES program. This program is enforced in California by the RWQCBs. The permit requires that the applicant develop and adhere to a Stormwater Pollution Prevention Plan (SWPPP) including implementation of Best Management Practices (BMPs) to control erosion, siltation, turbidity, and pollution of study area media by other potential contaminants typically associated with construction activities. The SWPPP also includes BMPs necessary to control or prevent the release of non-storm water discharges in storm water runoff. Additional information on storm water management is described in Section 3.6, *Hydrology and Water Quality*.

Asbestos Hazard Emergency Response Act (AHERA) (1986)

This Act is the federal legislation that governs the control and abatement of asbestos hazards present in school buildings. The purpose of this Act is to also require EPA to conduct a study to determine the extent of danger to human health posed by asbestos in public and commercial buildings and the means to respond to any such danger.

National Emission Standards for Hazardous Air Pollutants 40 CFR 61 Subpart M – (NESHAP)

If utility pipelines would be removed or relocated, or buildings would be removed or renovated, the Project may be subject to the requirements stipulated in NESHAP. These requirements include but are not limited to: 1) Notification requirements to the San Luis Obispo County Air Pollution Control District (APCD); 2) asbestos survey conducted by a Certified Asbestos Inspector; and 3) applicable removal and disposal requirements of ACMs.

Federal Occupational Safety and Health Administration (OSHA) - Process Safety Management Standard (29 CFR 1910.119)

This standard includes requirements for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals. Some of the requirements of this standard include: all information pertaining to the hazardous chemicals shall be available to the employees; employees shall be given training on the operation of equipment with hazardous materials; and, the employer is required to perform a process hazard analysis.

U.S. Department of Transportation

The U.S. Department of Transportation regulates hazardous materials transportation between states. Within California, the California Department of Transportation (Caltrans) and California Highway Patrol enforce federal law. Together, these agencies determine driver training requirements, load labeling procedures, and specifications for container types to be used.

3.6.3.2 State

Site-Specific Health and Safety (California Division of Occupational Safety and Health Administration [Cal/OSHA] Title 8 and OSHA 29 Code of Federal Regulations [CFR] 1910).

The Project is subject to the requirements of state and federal occupational safety and health requirements during Project operations. Under these requirements, a Site-specific Health and Safety Plan must be developed prior to initiation of a proposed project. Workers potentially exposed to hazardous materials in their workplace must be trained so that they are aware of the hazards and provided necessary protection from the hazardous materials.

California Air Resources Board (ARB) Airborne Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Section 93105)

This regulation applies to any area to be disturbed that is located in a geographic ultramafic rock unit, or to any area where Naturally Occurring Asbestos (NOA) or serpentine would be disturbed. Specific requirements may include conducting a geologic evaluation, development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD.

Hazardous Material Release Response Plans and Inventory Law (California Health and Safety Code [HSC], Chapter 6.95)

This law is designed to reduce the occurrence and severity of hazardous materials releases. This state law requires businesses to develop a Release Response Plan for hazardous materials emergencies if they handle more than 500 pounds, 55 gallons, or 200 cubic feet of hazardous materials. In addition, the business must prepare a Hazardous Materials Inventory of all hazardous materials stored or handled at the facility over the above thresholds. Also, all hazardous materials must be stored in a safe manner. Both the Release Response Plan and the Hazardous Materials Inventory must be supplied to the Certified Unified Program Agency (CUPA) for the program. For the Project site, the CUPA is the San Luis Obispo County Health Agency.

California HSC, Division 20, Chapter 6.8, Section 25319.5 - Preliminary Endangerment Assessment (PEA)

The California HSC requires that a PEA provide sufficient information to determine whether or not current or past waste management practices have resulted in the release or a threatened release of hazardous substances that pose a threat to public health or the environment. The PEA should also provide sufficient information to conclude whether or not significant response actions are necessary at the site as well as include an analysis of the scope and identity of the affected community.

Safe Drinking Water and Toxic Enforcement Act (Proposition 65) (1986)

In California, pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986: (1) no person in the course of doing business shall knowingly discharge or release a chemical known to the state to cause cancer or reproductive toxicity into water or onto land where such chemical passes or probably will pass into any source of drinking water, and (2) no person in the course of doing business shall knowingly and intentionally expose any

individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual. The "no significant risk" level for carcinogens that is enforced by this Act is one in one hundred thousand (1×10^{-5}).

Porter-Cologne Water Quality Control Act (Division 7 of the California Water Code)

The Porter-Cologne Act establishes a regulatory program to protect water quality and to protect beneficial uses of state waters. The Porter-Cologne Act also establishes the state board and regional boards as the principal state agencies responsible for control of water quality. Each of the nine RWQCBs in California is required to develop guidance to assist in ensuring that the intent of the Porter-Cologne Act is met. Cleanup criteria are based on the type of contaminant (e.g., gasoline, diesel, or oil) released and the depth to groundwater.

HSC, Division 20, Chapter 6.5, and California Code of Regulations (CCR) Title 22 – Hazardous Waste Management

Waste that is toxic, corrosive, flammable, or reactive when tested in accordance with the CCR, Title 22, Article 11, Section 66693, must be handled, stored, transported, and disposed of in accordance with these regulations, which are more stringent than federal regulations.

HSC, Division 20, Chapter 6.7, and CCR, Title 23 – UST Management

USTs used for storing petroleum products must be managed in accordance with California law, which provides requirements for installation, materials used, secondary containment, overspill protection, and monitoring.

California Fire Code

To minimize risks to public health and the environment, a Fire Prevention Inspector shall review a list of hazardous materials stored aboveground on a property to assess potential individual and/or cumulative impacts to the property and surrounding areas. The inspector would ensure that hazardous materials stored onsite are in compliance with Chapter 6.95 of the California HSC. The fire code provides uniform fire prevention, hazardous material, and building construction regulations.

FAA, Federal Aviation Regulation, Part 77 Objects Affecting Navigable Airspace - A Notice of Proposed Construction or Alteration (Form 7460-1) maybe required by the FAA. The FAA Airport Design Guide, Advisory Circular (AC) 150/5300-13, contains guidance

pertaining to land uses within the Runway Protection Zone (RPZ). As part of FAA grant assurances, if an airport sponsor receives federal funds for an airport, it is required that use of land adjacent to or in the immediate vicinity of the airport be restricted to activities and purposes compatible with normal airport operations.

3.6.3.3 Local

San Luis Obispo Municipal Code – Demolition and Moving of Buildings Section 115 Public Safety Requirements

These requirements include general requirements for building demolition activities, permitting for such activities, hauling operations, and routes of moving materials. In addition, there are subsections included for dust and debris, fire safety, and removal and disposal of demolition materials.

City of San Luis Obispo General Plan

Safety Element

The City's General Plan guides the use and protection of various resources to meet community purposes. The Safety Element focuses on achieving acceptable levels of risk through decisions on land use and the form of development, with consideration for the closely related factor of transportation. The Safety Element includes policies that describe an approach to achieving the goals of the General Plan. In terms of hazardous materials, there are three policies included in the Safety Element:

Policy 3.0 Adequate Fire Services. Development should be approved only when adequate fire suppression services and facilities are available or will be made available concurrent with development, considering the setting, type, intensity, and form of the proposed development.

Policy 3.1 Wildland Fire Safety.

> F. Wildland fire hazard severity zones shall be classified as prescribed by CAL FIRE. Areas within the City, including "Very High" Fire Hazard Severity Zones, if any, shall be classified by the City's Fire Code Official based on findings supported by substantial evidence in the record as required by Government Code Section 51179 and considered by City Council at a public hearing. Meaningful, early notification and input shall be obtained from nearby neighborhoods which may be affected.

G. New subdivisions shall be prohibited in areas of "Very High" wildland fire hazard unless part of conservation or open space acquisition program. Development of existing parcels shall require a development plan to manage fuels, maintain a buffer zone, and provide adequate fire protection to the approval of the Chief Building Official. The development plan must be consistent with Policies required by the City's Conservation and Open Space Element.

H. The City of San Luis Obispo is considered a "Community at Risk" due to the threat of wildfire impacting the urban community. The City shall continue to enhance the fire safety and construction codes for new buildings in order to reduce the risk of urban fires that may result from wildfires. Citywide building code enhancements should include: Fire resistant exterior wall coverings; Sprinkler protection in attic areas; and Ember resistant vent systems for attics and under floor areas and other provisions identified in CBC Chapter 7A.

Policy S 5.2 Minimizing Hazardous Materials Exposure – People's exposure to hazardous substances should be minimized.

Policy S 9.18 Safety of Structures and Facilities – Existing and new structures and facilities should reflect adopted safety standards. Within this policy, the City has developed a program, Program S 8.6.5 Required Inspections, whereby the City will conduct safety inspections for hazardous materials in commercial, industrial, and multifamily residential buildings.

Land Use Element

The City's 2014 LUCE, the associated LUCE Update EIR, and technical studies such as the 2014 Johnson Aviation Report address the issues of airport hazards in great detail. Based on this analysis, the LUCE set forth both policies and programs to address airport safety which are summarized below and discussed in more detail in Section 3.8, *Land Use and Planning.* It should be noted that Program 7.16 and 7.17 have been completed and adopted and are presented here for informational purposes only.

Policy 7.4 Airport Safety Zones. Density and allowed uses within the Airport Safety Zones shall be consistent with the San Luis Obispo County Regional Airport ALUP unless the City overrides a determination of inconsistency in accordance with Section 21676 and 21676.5 et seq. of the Public Utilities Code. If the City overrides a determination, all land uses shall be consistent with the State Aeronautics Act and guidance provided in the California Airport Land Use Planning Handbook guidelines, City policies, and noise

standards as substantiated by the San Luis Obispo County Regional Airport Master Plan activity forecasts as used for noise planning purposes.

Policy 7.6 Airspace Protection. The City shall use the Airport Master Plan Update and FAA airport design standards and Part 77 surfaces to keep the airspace surrounding the airport free of objects where required by the FAA or shall limit the height of objects as required by the FAA. The City shall also ensure obstruction clearance is provided for all en route and terminal (airport) instrument procedures as per the United States Standard for Terminal Instrument Procedures (TERPS) to avert modifications to any planned or published instrument approach or instrument departure procedures at SBP.

Program 7.16 Airport Overlay Zone. The City shall create an AOZ to reflect the boundaries of the ALUP within the City limits. The purpose of the AOZ is to codify airport compatibility criteria in areas for which the City may override the ALUC determination to ensure compliance with the requirements of the California State Aeronautics Act (Cal. Pub. Utilities Code, Section 21670, et seq.), which establishes statewide requirements for airport land use compatibility planning, guidance from the California Airport Land Use Planning Handbook, which is published by the Caltrans Division of Aeronautics to support and amplify the State Aeronautics Act requirements, and other related federal and state requirements relating to airport land use compatibility planning. Implementation of the compatibility policies will be accomplished through the Zoning Code.

Program 7.17 Airport Land Use and Zoning Code. The City shall update its Zoning Regulations to address allowable uses and development standards for areas in which the City may override a determination of inconsistency. Zoning regulations shall be consistent with the requirements of the State Aeronautics Act, use guidance from the Caltrans Airport Land Use Planning Handbook, and comply with related state and federal requirements relating to airport land use compatibility. These development standards will include, but not be limited to, intensity and density limitations, identification of prohibited uses, infill development, height limitations, obstructions, and other hazards to flight, noise insulation requirements, buyer awareness measures, nonconforming uses and reconstruction and the process for airport compatibility criteria reviews by the City consistent with these development standards.

Airport Compatible Open Space Plan

The Airport Compatible Open Space Plan (ACOS) establishes open spaces in the areas around the Airport that can serve as reserve spaces (for aircraft emergency situations; see

Figure 6 of the ALUP Compatibility Analysis Pre-Application in Appendix N). By maintaining reserve spaces that keep certain land adjacent to the Airport free and clear from obstruction or from buildings and uses where people congregate, the ACOS improves airport safety while allowing for more intense development of urban areas. The areas identified as reserve space in the ACOS include land that is close to the Airport, in line with the main airport runway, or along an over-flight area where aircraft typically operate at lower altitudes. Identification of these areas in the ACOS adds airport safety to the list of reasons why these lands should not be developed (City of San Luis Obispo and County of San Luis Obispo 2013). On July 21, 2004, the ALUC voted to amend the ALUP with inclusion of the City's ACOS.

Airport Area Specific Plan

Policy 4.3.8 Approach and Climb-Out Paths. Retain extensive undeveloped land under the approach and climb-out paths for all active runways.

Policy 4.3.9 East Airport Area Clear Zones. The City and the County will work to obtain land or development rights in the East Airport Area to maintain clear zones for the east-west runway.

Policy 4.3.10 Runway Protection Zones. No new development, roads or land uses shall be allowed within the Runway Protection Zone in accordance with the Federal Aviation Administration policies (including the Interim Guidance published on September 27, 2012, and the Advisory Circular 150/5300-Change 17, unless the interim guidance is replaced with future FAA policies), unless the development or land use is specifically approved in coordination with the FAA.

Airport Land Use Plan for the San Luis Obispo County Regional Airport

State law requires an independent, countywide ALUC to adopt an ALUP for each airport. This plan establishes zones based on flight patterns, with the aim of having future development be compatible with airport operations, considering safety and noise exposure. The ALUP was last amended in 2005 and is in process of being updated reflect the adopted Airport Master Plan. A draft plan has not yet been released for public review and is anticipated to be available in 2017. The ALUP contains several safety-related policies to address future development:

- ***Policy S-1.*** Would permit or lack sufficient provisions to prohibit structures and other obstacles within the Runway Protection Zones for any runway at the Airport, as depicted in ALUP Figure 4.

- ***Policy S-2.*** Would permit or fail to adequately prohibit any future residential or nonresidential development or redevelopment which would create, within the site to be developed or redeveloped, a density greater than specified in ALUP Table 7 or any mixed-use development or redevelopment which would create, within the site to be developed or redeveloped, densities greater than illustrated in ALUP Figures 5 through 8.

- ***Policy S-3.*** Would permit or fail to adequately prohibit any future development project which specifies, entails, or would result in a greater building coverage than permitted by ALUP Table 7 (see Table 3.8-3 in Section 3.8, *Land Use and Planning*).

- ***Policy S-4.*** Would permit or fail to adequately prohibit high intensity land uses or special land use functions (impaired egress uses or unusually hazardous uses), except that, when conditions specified by ALUP Table 7 for density adjustments have been determined to be met by the ALUC, high intensity land and/or special function uses may be allowed in Aviation Safety Area S-2.

- ***Policy 4.4.4.2 Aviation Safety Sub-Areas.*** In consideration of the above, the ALUC has established and adopted, within Aviation Safety Area S-1, the Aviation Safety Sub-Areas shown in Figure 3. The Aviation Safety Sub-Areas are:

  a. **Safety Area S-1A** – Those portions of Safety Area S-1 which are located within 500 feet of the extended runway centerline of Runway 11-29 and within 5000 feet of an existing or planned runway end or which are within 250 feet of the extended runway centerline of Runway 7-25 and within 3000 feet of the runway end.

  b. **Safety Area S-1B** – Those portions of Safety Area S-1 which are not included in Safety Area S1a, but are within probable gliding distance for aircraft on expected approach or departure courses; also includes State-defined sideline safety areas, inner turning zones and outer safety zones for both Runway 11-29 and Runway 7-25 and portions of existing Airport Land Use Zone 3. Aviation safety hazards to be particularly considered in this area include mechanical failures, fuel exhaustion, deviation from glideslope

or MDA during IFR operations (due to pilot error or equipment malfunction), loss of control during short approach procedures, stall/spin incidents during engine-out maneuvers in multi-engine aircraft, loss of control during "go around" or missed approach procedures, and midair collisions.

c. **Safety Area S-1C** – Those portions of Safety Area S-1 which are not included in Safety Areas S-1a or S-1b, but are adjacent to (within 0.5 nm) frequent or low-visibility aircraft operations at less than 500 feet above ground level. Aviation safety hazards to be considered in this area include mechanical failures, deviation from localizer or VOR during IFR operations (due to pilot error or equipment malfunction), stall/spin incidents during engine-out maneuvers in multi-engine aircraft, loss of control during "go around" or missed approach procedures, and loss of visual references by aircraft performing circle-to-land procedures.

In the event of any conflict between these verbal descriptions and the depiction of Aviation Safety Areas in Figure 3, the depictions shown in Figure 3 shall take precedence.

- ***4.5.3 Airspace Protection Policies.*** Notwithstanding any other provision of this ALUP, any proposed general plan, general plan amendment, specific plan, specific plan amendment, zoning ordinance, zoning ordinance amendment, building regulation modification, or individual development proposal will be determined to be inconsistent with the ALUP if the proposed local action:

    a. **Policy A-1** – Lacks sufficient provisions to ensure that no structure, landscaping, apparatus, or other feature, whether temporary or permanent in nature shall constitute an obstruction to air navigation or a hazard to air navigation, as defined above.

    b. **Policy A-2** – Would permit or lacks sufficient provisions to prohibit any new landfill or other disposal site at a site or of a configuration which is not consistent with all current state and federal statutes, FAA regulations, and FAA Advisory Circulars concerning the relationship of landfills and waste disposal sites to aeronautical operations and facilities.

These policies are linked to designated Airport runway safety zones which encompass the Project site and are discussed more fully in Section 3.8, *Land Use and Planning*.

3.6.4 Environmental Impact Analysis

3.6.4.1 Thresholds of Significance

The Project would have a significant impact if it would create a public health hazard or cause harm to the environment. The significance criteria for this hazardous materials analysis are based on Appendix G of the 2016 CEQA Guidelines. A hazards and hazardous materials impact is considered significant if the Project 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 waste within 0.25 mile of an existing or proposed school;

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;

e) Locate a project 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;

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

3.6.4.2 Impact Assessment Methodology

The methodology used in this assessment includes review of existing adopted plans, public databases, recent studies and EIRs, and site specific studies such as the PSA to assess the potential presence of hazards and hazardous materials sites within the Project site and vicinity. The PSA evaluated the site for conditions indicative of hazardous materials resulting from previous releases, or potential release of hazardous materials. As part of the PSA, soil sampling was conducted and tested for hydrocarbons. The Project site was also

evaluated for the presence of hazardous materials based on a review the LUCE Update EIR. In addition, this analysis integrated current information for contaminated sites from EPA's EnviroFacts, and DTSC's EnviroStor and GeoTracker databases.

Risk associated with wildfire is assessed based on the existing Fire Hazard Severity Zone as determined by CALFIRE and changes that may result after implementation of the Project.

The analysis also describes how the policies, regulations, and standards provided in the LUCE, as well as Project design measures would minimize airport-related hazards. Key LUCE related restrictions include limitations on development within designated Airport AOZs which limit allowable development types and intensity based upon updated mapping of runway approach areas (refer to Section 3.8, *Land Use and Planning* for a complete description). Project-related design features would include:

- A 300-foot-wide open space buffer north of Buckley Road aligned with the approximate extended centerline of Runway 7-25, and a 100- by 1,200-foot-wide ACOS between the Jespersen Road Extension and the eastern Project boundary.
- A 150-foot-wide open space buffer on the eastern Project boundary.
- Approximately 34.5 acres of open space and parks in southeastern area of Project site nearest the Airport and ALUP Safety Area S-2.
- Limiting development in ALUP Safety Area S-1B to seven dwelling units, to be located in the northeastern corner of the safety zone.
- No development within the S-1C Safety Zone.

Further, analysis included review of the State Aeronautics Act, the FAA regulations, and guidance provided in the Caltrans Airport Land Use Planning Handbook. In addition, policy consistency with the ALUP Safety Areas and City LUCE AOZs is provided in Section 3.8, *Land Use and Planning.* According to CEQA Section 21096 and CEQA Guidelines Section 15154, for the purposes of determining excessive safety and noise impacts "…the agency shall utilize the Airport Land Use Planning Handbook published by Caltrans' Division of Aeronautics to assist in the preparation of the EIR relative to potential airport-related safety hazards and noise problems." ALUP consistency or inconsistency is addressed in Section 3.8, *Land Use and Planning*; however, for the purposes of this section, the Handbook and the ALUP are used for hazards impacts.

There are no public schools within 0.25 mile of the Project site and therefore threshold 'c' would not apply. Typical materials (e.g., cleaning soaps, solvents and pesticides) used in a residential and commercial development such as the Project would be similar in nature to

those used at the school due to the continual presence of residents and retail patrons. Accordingly, there would be no potentially significant adverse impact to schools.

3.6.4.3 Project Impacts and Mitigation Measures

Potentially sensitive receptors that could be affected by hazards and hazardous materials impacts include future Project site occupants, Project construction workers, and nearby ecological receptors. Potential impacts related to hazardous materials, airport operations and wildfire are discussed further below and summarized in Table 3.6-3.

Table 3.6-3. Summary of Project Impacts

Hazards and Hazardous Materials Impacts	Mitigation Measures	Residual Significance
HAZ-1. During grading/construction activities and Project operations, the Project would potentially expose persons to potentially toxic, hazardous, or otherwise harmful chemicals through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment.	MM HAZ-1	Significant but Mitigable
HAZ-2. The Project would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	None required	Less than Significant
HAZ-3. The Project site is located within the LUCE defined AOZs and ALUP Safety Areas and would potentially result in an airport-related safety hazard for people residing or working in the Project site.	None required	Less than Significant
HAZ-4. Implementation of the Project could expose people or structures to a significant risk of loss, injury, or death involving wildfire.	None required	Less than Significant

Impact HAZ-1 During grading/construction activities and Project operations, the Project would potentially expose persons to potentially toxic, hazardous, or otherwise harmful chemicals through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment (Significant but Mitigable).

Based on the Project's proximity to the Chevron Tank Farm property and contaminants contained within associated cleanup sites, other identified cleanup sites, the potential presence of ACM within the onsite farm house, and the use of pesticides and herbicides within the site, there is a potential for construction workers and the nearby general public

to be exposed to hazardous materials during grading and construction of site buildings and structures.

Contamination from the 1926 Unocal Tank Farm Fire

The 1926 Unocal Tank Farm fire and associated release of hazardous materials onto the Project site resulted in the contamination of soils and groundwater onsite. As described above, several investigations performed on the Chevron Tank Farm property concluded that residual contaminants from this incident are currently contained within the Chevron Tank Farm property. The PSA concludes that the relatively minor amounts of heavy hydrocarbon presence does not pose any significant health or environmental concerns (see Appendix L). However, although extensive testing and groundwater monitoring at this site has shown that the contamination has not migrated from the Chevron Tank Farm facility, future construction associated with development of the Project has the potential to expose construction workers to hydrocarbons within soils and groundwater (City of San Luis Obispo 2014).

Offsite Contamination

In addition to the two active cleanup sites associated with the Chevron Tank Farm property, there are three additional active cleanup sites and three inactive within 0.5 mile of the Project (refer to Table 3.6-1). The potential of these sites to result in migration of contaminated materials to the Project site is assessed in the PSA. The inactive cleanup sites have been remediated of contamination and require no further action from the DTSC; thus, these inactive sites have a very low potential for migration of contaminants into the site. Two active cleanup sites are along Los Osos Valley Road 0.5 mile away from the Project site and contain of soil and groundwater contamination; and two cleanup sites are located on Tank Farm Road 0.5 mile from the Project site, and contain groundwater contamination. Given the distance between the Project site and the active cleanup sites, the PSA concludes that potential for Project site contamination from these sites due to migration is low.

Hazardous Materials Associated with Agricultural Operations

Based on historical agricultural use on the Project site, there is potential for low concentrations of pesticides, herbicides and fertilizers to be to be exposed to construction workers and the nearby general public during grading and construction activities. Soil samples analyzed as part of the PSA were tested for 64 types of pesticides and herbicides of toxic concern, and samples showed no detectable concentrations. In addition, users of such materials are required to follow manufacturer instructions and dispose of excess

solutions and empty containers properly. Under normal use, pesticides and herbicides would be in low concentrations within soils that are generally not considered a hazard to human health (Grisanti & Associates 2011).

ACM and Lead

Due to the age of the existing farmhouse onsite, hazardous materials such as LBP and ACMs may be present onsite. As such, the potential exists for workers or the public to be exposed to these materials during demolition of the onsite building and hauling of debris materials. Existing state regulations require the abatement and control of asbestos and lead in advance of demolishment or renovation activities, as regulated in Title 8, Industrial Relations, of the CCR. The demolition waste may contain ACMs due to the age of the old farmhouse. However, based on recent field work at the Project site, this farmhouse appears to have been demolished. Accordingly, no demolition would be carried out as part of the Project. There may also be ACMs within the existing buildings on the Buckley Road Extension site. These structures would be demolished as part of the Project and may result in exposure of asbestos.

Naturally Occurring Asbestos

NOA could be uncovered as a result of the grading of less than 1 acre within serpentine rock on the Buckley Road Extension site (GeoSolutions, Inc. 2015). Where it is encountered, the mitigation below would apply.

Overall, due to the proximity of the adjacent Chevron Tank Farm property and associated historic releases, low concentrations of hazardous materials exist within soils and groundwater. Based on these conditions, there is potential for construction workers and/or nearby occupants to be exposed to potentially toxic, hazardous, or otherwise harmful chemicals during excavation, grading, and site preparation activities. However, with inclusion of mitigation measures, potential impacts to the construction workers and nearby general public associated with hazardous materials would be ***significant but mitigable.***

Mitigation Measures

MM HAZ-1 *Prior to earthwork and demolition activities, a site-specific Health and Safety Plan shall be developed per California Occupational Safety and Health Administration (Cal/OSHA) requirements. The Health and Safety Plan shall include appropriate best management practices (BMPs) related to the treatment, handling, and disposal of NOA and ACMs. A NOA*

Construction and Grading Project Form shall be submitted to the APCD prior to grading activities. All construction employees that have the potential to come into contact with contaminated building materials and soil/bedrock shall be briefed on the safety plan, including required proper training and use of personal protective equipment. During earthwork and demolition activities, procedures shall be followed to eliminate or minimize construction worker or general public exposure to heavy hydrocarbons and other potential contaminants in soil and groundwater, and potential ACMs within potential demolished materials. Procedures shall include efforts to control fugitive dust, contain and cover excavation debris piles, appropriate laboratory analysis of soil for waste characterization, segregation of contaminated soil from uncontaminated soil, and demolished materials. The applicable regulations associated with excavation, removal, transportation, and disposal of contaminated soil shall be followed (e.g., tarping of trucks and waste manifesting).

Plan Requirements and Timing. The Applicant shall submit the Site-specific Health and Safety Plan to the City for review and approval prior to issuance of grading and building permits from the City, and/or demolition permits from the County. The Applicant shall conduct necessary construction employee training prior to the initiation of construction.

Monitoring. The City and County shall ensure compliance. An Environmental Monitor shall be made available to monitor environmental compliance of the construction activities. The City and County shall also inspect the Project site during construction to ensure compliance with required plans.

Residual Impacts

Implementation of the above mitigation measures and compliance with federal, state, and local regulations would reduce the risk of hazardous impact to less than significant. Additionally, mitigation measures would facilitate the safe removal of potentially hazardous building materials and the cleanup of contaminated soils, thus reducing the level of risk within the Project site.

Impact HAZ-2 The Project would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (Less than Significant).

Operation of the Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. In addition, operation of residential and commercial uses within the Project site would entail routine cleaning and maintenance activities using common hazardous materials, such as cleaning fluids, detergents, solvents, adhesives, sealers, paints, fuels/lubricants and pesticides/herbicides, etc. However, applications of such materials would likely be in limited (i.e., not commercially reportable) quantities and would be handled in compliance with federal, state, and local regulations pertaining to their transport, use, or disposal. As further discussed in Section 3.7, *Hydrology and Water Quality*, implementation of standard good housekeeping measures, BMPs, site maintenance and security precautions, as well as compliance with standards and regulations would reduce potential impacts related to the routine transport, use, or disposal of hazardous materials to ***less than significant.***

Impact HAZ-3 The Project site is located within the LUCE defined AOZs and ALUP Safety Areas and would potentially result in an airport-related safety hazard for people residing or working in the Project site (Less than Significant).

Airport safety is primarily related to the potential for accidents related to aircraft operations such as emergency landings or in rare cases crashes, as well as ensuring that land use development is carried out in manner that minimizes or avoids risks associated with such aircraft incidents or accidents. Minimizing or avoiding risks to such land uses (e.g., residential neighborhoods) involves designating areas around the ends of runways that must be free of objects or sensitive land uses, limiting the height of new structures in the surrounding airspace, and understanding historical accident patterns. The Project site's proximity to the end of Runway 7-25 would present a potential airport-related safety issue for future development, if development intensities exceed the standards established in the ALUP and the Handbook. In the event of an aircraft emergency incident, development of new structures within or near the approach path for Runway 7-25 has the potential to place future residents and users of the commercial Town Center, parks and open spaces, as well as passengers and crew of aircrafts at risk. The risk of an aircraft accident increases with proximity to the runway and its approach path, and development is generally discouraged in the zones closest to the ends of runways to prevent placing people at risk of an accident.

Although Runway 7-25 supports only 3 percent of Airport aircraft operations and is utilized for general aircraft rather than commercial services, a low potential for accidents remains. The Project site is located approximately 0.7 mile away from Runway 7-25, and the nearest proposed developed portion of the Project is 0.8 mile from the end of the runway. The nearest proposed residential area is in the approximately 1.0 mile from the end of Runway 7-25 along the extended centerline path of Runway 7-25. However, the majority of the Project site is outside of the general approach areas of Runway 7-25. The site is mostly overlapped by general circulation areas as indicated by AOZ 6 and S-2 which generally indicate areas of overhead aircraft turning movements.

Project development would result in construction of 720 new homes and a small commercial 15,000 sf Town Center with an associated increase of 1,649 new residents within LUCE AOZs and ALUP Safety Areas.

As confirmed during the pre-application for the Project with the ALUC, approximately 34.9 acres of the Project site fall within ALUP Safety Area S-1B, 7.6 acres would be within S-1C, and 107.5 acres would be within S-2 (see Appendix N). In comparison, while the entire Project site is located within City LUCE AOZ 6, the level of proposed development would be consistent with the restrictions of this AOZ. No Project residential development would be located within more restrictive City LUCE AOZs, which are located along the eastern Project boundary or closer to the Airport offsite to the east. These potential inconsistencies are discussed at length in Section 3.8, *Land Use and Planning* (see Tables 3.8-3 and 3.8-5).

The proposed development is consistent with the population and density standards specified in the Handbook, the population and density standards in the ALUP, and the population and density standards in the City's AOZs. Therefore, no resultant substantial physical Airport-related safety hazards would occur as result of Project implementation. While the Project would still be subject to review by the ALUC for consistency with the ALUP, such issues are further discussed in Section 3.8, *Land Use and Planning.*, airport safety impacts to residents and commercial Town Center employees or patrons within the Project site would be ***less than significant***.

Impact HAZ-4 Implementation of the Project could expose people or structures to a significant risk of loss, injury, or death involving wildfire (Less than Significant).

As described in Section 3.6.2.1, *Wildfire Risk*, the Project would be located in a part of the City that includes moderate fire hazard potential. Extensive areas of onsite and adjacent grasslands and vegetation along Tank Farm Creek could provide natural fuels for wildfires in the area.

The Project would include the construction of 720 residences and a 15,000 sf Town Center. Development of the Project would increase the potential to expose both structures and people to wildfires. Operation of construction equipment such as saws, welders, generators, and heavy machinery would temporarily introduce new ignition sources into the area. While the chance of accidental ignition by such heavy equipment may seem improbable, several wildland fires in Southern California have been ignited by such equipment. Under Project conditions, wildfires burning into the open space surrounding the Project would present the potential for serious damage to the Project and would potentially threaten the health and safety of residents.

Due to the increase in residential population within the site, the potential exists for impacts related to exposing people or structures to wildfires. However, the northern extent of the High and Very High Fire Hazard Severity Zones terminate approximately 1 mile north of the Project site (CAL FIRE 2007). In addition, along the Project site's southern boundary, a widened Buckley Road corridor would provide a limited fuel break between higher fire hazard areas to the south and new development, as well as improved emergency vehicle access. As such, the Project is at moderate risk for wildfires. Compliance with the CBC and UBC construction requirements for residences would minimize this risk. Consistent with the LUCE Update EIR, compliance with policies within the Safety Element would reduce the risk of damage or injury. Therefore, impacts related to exposing people or structures to wildland fires are considered ***less than significant***.

3.6.4.4 Cumulative Impacts

Cumulative pending development projects and land use changes within the City and the Project vicinity would have the potential to expose future area residents, employees, and visitors to chemical hazards through development of sites and structures that may be contaminated from either historic or ongoing uses. In addition, the increased development would also expose residents, employees, and visitors to potential aircraft-related hazards.

Several cumulative projects listed within Table 3.0-1 are also within AOZs and ALUP Safety Areas, thereby potentially exposing persons to risk of airport safety hazards. These include the Chevron Tank Farm Remediation Project, residential units, and commercial developments near the Airport. Pending projects such as the 500 residential units on the proposed San Luis Ranch Specific Plan project would also incrementally contribute to potential cumulative Airport-related hazards. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Therefore, specific projects proposed in the City would be required to undergo individual environmental review, including review of potential impacts related to hazards and hazardous materials that are applicable to that particular development site and proposed use. Because restrictions on development or remediation requirements would be applied in the event that hazardous materials posed a risk to safety, it is anticipated that cumulative impacts from exposure to hazards or hazardous materials would not be cumulatively considerable. Additionally, projects anticipated to occur under the LUCE would facilitate the safe removal of potentially hazardous building materials and the cleanup of contaminated properties, thus reducing the level of risk on a particular site. In addition, all future development would be regulated to reduce the risk of exposure to aircraft-related hazards. Therefore, cumulative impacts are considered ***less than significant***.

This page intentionally left blank.