
3.7 HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section of the EIR discusses the potential presence of hazardous materials and conditions within the project site and analyzes the potential risk of these conditions in proximity to existing and proposed development and human activities. The analysis is based primarily on the results of the *Phase I Environmental Site Assessment and Limited Phase II Soil Testing* report (ESA) prepared for the project site by Earth Systems Pacific (ESP) in August 2009, and the *Natural Gas Pipeline Risk Analysis* prepared for the project by Kleinfelder, Inc., included as **Appendix F** to this EIR. The purpose of the ESA is to evaluate the potential presence of soil or groundwater contamination related to any past use, handling, storage, or disposal of hazardous materials or petroleum products on or near the project site.

3.7.1 ENVIRONMENTAL SETTING

The topography of the project site consists of a subdued north-trending ridge in the middle of the site with evenly sloping areas on its western flank and rolling terrain on the eastern flank. Elevations range from approximately 520 feet at the southeast corner to 360 feet at the northwest corner of the project site. There are no perennial surface water bodies on the project site. Depth to groundwater is approximately 80 to 100 feet and water flows northwest.

HAZARDOUS MATERIALS

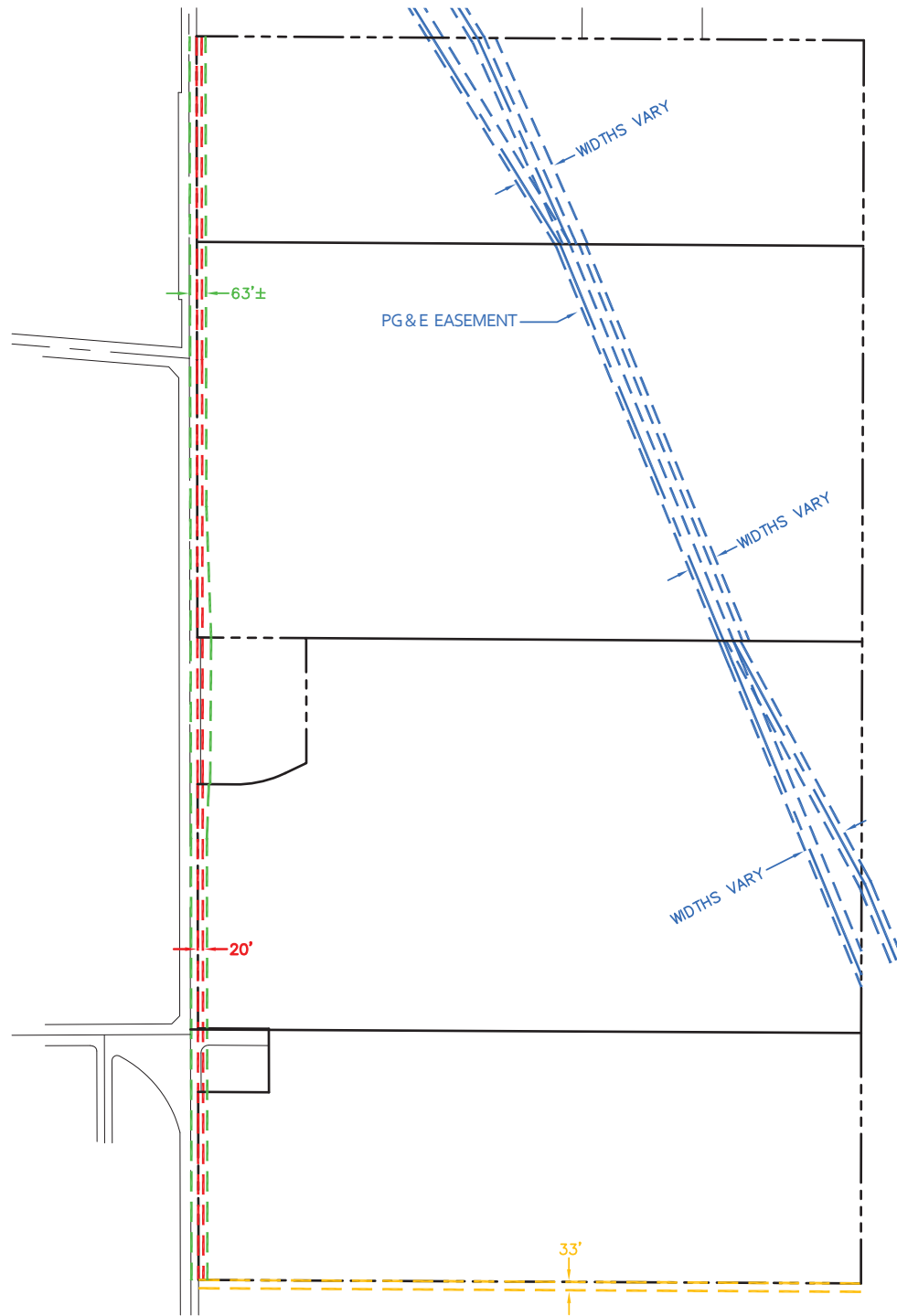
Existing Conditions and Improvements

A reconnaissance of the project site was conducted by ESP on July 1, 2009 to identify possible sources or visual evidence of contamination from any use, storage or handling of hazardous materials on or near the project site. Manmade structures observed on the project site include: two residences, a barn, a windmill, several dilapidated sheds, automobiles, and a small concrete structure identified as a "gas station." An underground PG&E natural gas pipeline traverses the northeastern portion of the site, in a northwest-southeast alignment (see **Figure 3.7, Existing Easements**). The remainder of the project site consists of an orchard and open rangeland used for grazing and hay farming. Additional details for the primary improvements on the site are discussed below.

2111 Fairview Road (Occupied Residence): An occupied residence and barn are located at this address. The vegetation on this parcel consists of a walnut orchard and ornamental trees. An active trailer-mounted diesel storage tank is also located north of the barn. A small amount of soil staining is associated with this storage tank, and additional staining exists near the barn where tractors and farm machinery are parked. Small quantities of petroleum products are stored within the barn and garage for yard care equipment. A concrete slab that appears to be used for equipment cleaning is located between the barn and residence. Water wells were also observed on the property; however, the ESA does not indicate the specific number of existing wells.

One pole mounted electrical transformer is located at the northern edge of the orchard near the residence. The transformer appears to be in good condition and there is no evidence of leakage. The specific contents of the transformer are not known.

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- PG&E NATURAL GAS TRANSMISSION LINE EASEMENT
- SUNNYSLOPE WATER DISTRICT WATERLINE EASEMENT
- BUREAU OF RECLAMATION EASEMENT
- SAN BENITO COUNTY WATER DISTRICT EASEMENT

Source: Ruggeri-Jensen-Azar, February 2010

Not to Scale



Figure 3.7
Existing Easements



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2201 Fairview Road (Vacant Residence): This vacant residence has been boarded closed. Several dilapidated sheds, automobiles, and a small concrete structure are situated around the residence. Vegetation consists of fruit and ornamental trees. Significant amounts of ground surface staining were observed in an area where several empty 250-500-gallon fuel storage tanks are located. Numerous five-gallon buckets and several 55-gallon drums are also scattered in the rear of the vacant residence. Photos of these containers are included in the ESA. Some buckets were labeled to contain petroleum products such as kerosene and motor oil. Finally, a plywood-covered septic pit is located near the front of the residence. No sumps were observed.

Contaminated Building Materials: Due to the age of the existing dwelling units on the site, asbestos and lead-containing residential building materials could potentially be present.

Pipeline: A regional natural gas pipeline easement containing two natural gas pipelines owned by PG&E traverses the project site. According to PG&E these pipelines are inspected every ten years. PG&E is not aware of any pipeline leaks on the project site at the present time.

Hollister CDF Station: The Hollister California Department of Forestry Station is located at 1979 Fairview Road within the project site, approximately 17 feet west of the plan area boundary and approximately one quarter mile west of the proposed school site. The CDF site contains registered underground and aboveground fuel storage tanks. There have been no violations or release of hazardous materials reported at this site.

Off-Site Conditions

The project site is surrounded by residential development west of Fairview Road, and by rural residential, grazing and range land on the east side of Fairview Road. The Hollister Municipal Airport is located approximately 3.5 miles northwest of the project site. The airport supports general aviation activities. The project site is not located within the applicable airport land use plan (Hollister Municipal Airport Master Plan, 2000).

The following nearby facilities have been identified in the ESA as being associated with existing or potentially hazardous materials. Potential environmental effects of these facilities related to the project are discussed in **Section 3.7.3, Project Impacts and Mitigation Measures**.

PG&E Hollister Maintenance Station: The PG&E Hollister Maintenance Station is located at 1980 Santa Ana Road, approximately 0.6 miles northwest of the project site. In 1987, 62.2 tons of contaminated soils were identified at this location.

United Defense: The United Defense facility is located at 900 John Smith Road, approximately 0.5 miles southeast of the project site. This facility was formerly used to test munitions and field test military vehicles and their weapons systems, but is no longer operational.

3.7.2 REGULATORY SETTING

DEFINITION OF HAZARDOUS MATERIALS

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined in Title 22 of the California Code of Regulations (CCR), section 66260.10, in accordance with Health and Safety Code section 25501 (o), as follows:

3.7 HAZARDS AND HAZARDOUS MATERIALS

...any material that, because of its quantity, concentration, or physical, chemical or infectious characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

Factors that influence the health effects of exposure to hazardous material include the dose to which the person is exposed, the frequency of exposure, the exposure pathway and individual susceptibility.

FEDERAL REGULATIONS

The Environmental Protection Agency (EPA) provides leadership in the nation's environmental science, research education and assessment efforts. The EPA works closely with other federal agencies, including the Occupational Safety and Health Administration (OSHA), the Department of Transportation (DOT) and the National Institute of Health (NIH), state and local governments and Native American tribes to develop and enforce regulations under existing laws. The EPA is responsible for researching and setting national standards for a variety of environmental programs and delegates to states responsibility for issuing permits and monitoring and enforcing compliance.

The California Department of Toxic Substance Control (DTSC) is authorized to implement the State's hazardous waste management program for the EPA. The federal EPA continues to regulate hazardous substances under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Comprehensive Environmental Response, Compensation and Liability Act

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. section 9601 et seq.), commonly known as Superfund, 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 releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites and established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions: Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response, and long-term remedial response actions, that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life threatening. These actions can be conducted only at sites listed on EPA's National Priorities List (NPL).

Resource Conservation and Recovery Act

Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sections 6901 et seq. (1976), gave EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the

generation, transportation, treatment, storage and disposal of hazardous waste. In addition, RCRA set forth a framework for the management of non-hazardous wastes.

Amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. RCRA focuses only on active and future facilities and does not address abandoned or historical sites (see CERCLA).

The Federal Hazardous and Solid Waste Amendments (HSWA) (42 U.S.C. Section 9601 et seq.) to the RCRA that required phasing out land disposal of hazardous waste. Some of the other mandates of this law include increased EPA enforcement authority, more stringent hazardous waste management standards and a comprehensive underground storage tank program.

Federal Toxic Substances Control Act

Congress enacted the Toxic Substances Control Act (TSCA) in 1976 (15 U.S.C. Sections 2601 et seq.), to become effective January 1, 1977. The act authorizes the Environmental Protection Agency (EPA) to secure information on all new and existing chemical substances and to control any of these substances determined to cause an unreasonable risk to public health or the environment. TSCA also includes requirements for the storage, use, and disposal of Polychlorinated Biphenyl (PCB)-containing materials.

Federal Insecticide, Fungicide, and Rodenticide Act

The primary focus of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. Sections 136 et seq., was to provide federal control of pesticide distribution, sale, and use. EPA was given authority under FIFRA not only to study the consequences of pesticide usage but also to require users (farmers, utility companies, and others) to register when purchasing pesticides. Through later amendments to the law, users also must take exams for certification as applicators of pesticides. All pesticides used in the U.S. must be registered (licensed) by the EPA. Registration assures that pesticides will be properly labeled and that if in accordance with specifications, will not cause unreasonable harm to the environment.

STATE REGULATIONS

The California Environmental Protection Agency (Cal-EPA) and the State Water Resources Control Board (SWRCB) establish rules governing the use of hazardous materials and the management of hazardous waste. Within Cal-EPA, California Department of Toxic Substance Control (DTSC) has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the state agency for the management of hazardous materials and the generation, transport and disposal of hazardous waste.

San Benito County is currently responsible for implementing Chapter 6.95 of Division 20 of the California Health and Safety Code (Section 25500 et seq.), relating to hazardous materials release response plans and inventory.

California Water Code

California Water Code Section 231 requires the California Department of Water Resources to develop well construction standards to protect California's groundwater quality. DWR Bulletin 74-90 (Supplement to Bulletin 74-81), California Well Standards, Water Wells, Monitoring Wells, Cathodic Protection Wells, June 1991, contains the minimum requirements for constructing,

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altering, maintaining and destroying these types of wells. The standards apply to all water well drillers in California and the local agencies that enforce them.

Hazardous Waste Control Laws

The California Hazardous Waste Control laws (HWCA) (Health and Safety Code Section 25100 et seq.) are the State's equivalent to RCRA and closely parallels RCRA by regulating the generation, storage, transportation, treatment and disposal of hazardous waste in the State. The primary authority for enforcement of HWCA and RCRA itself lies with the Department of Toxic Substances Control (DTSC). The State of California has been granted authorization by the EPA to administer all regulations under both RCRA and the State's HWCA.

Cal/OSHA

The California Occupational Safety and Health Administration (Cal/OSHA) is responsible for implementing workplace regulations. Cal/OSHA considers an asbestos-containing material (ACM) as one containing at least one-percent asbestos. A contractor certified by the California Contractor's State License Board to conduct asbestos-related work must perform the removal or disturbance of 100 square feet or more of ACM. Requirements specifically addressing asbestos are contained in Title 8 of the California Code of Regulations (CCR) and in the California Health and Safety Code.

REGIONAL REGULATIONS

Monterey Bay Unified Air Pollution Control District (MBUAPCD)

Under District Rule 424, the MBUAPCD adopted regulations and policies implementing, among other things, asbestos demolition and renovation requirements developed by the U.S. Environmental Protection Agency (EPA), known as the National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 C.F.R. Part 61, Subpart M). NESHAP requires that a thorough inspection for asbestos-containing material be conducted before any regulated facility is demolished or renovated. Any building, including any dwelling, at the site of a proposed public or commercial project such as a new shopping mall, is a regulated facility subject to this regulation. See **Section 3.3, Air Quality**, for additional information.

LOCAL REGULATIONS

San Benito County Environmental Health Department (SBCEHD)

SBCEHD has been designated the lead agency for hazardous materials programs and acts as the single point of contact for issuance of permits. Site inspections of all hazardous materials programs (i.e., aboveground tanks and underground tanks, hazardous waste treatment, hazardous waste generators, hazardous materials management plans, etc.) are consolidated and accomplished by a single inspection.

The program provides emergency response to chemical events to furnish substance identification; health and environment risk assessment; air, soil, water and waste sample collection; incident mitigation and cleanup feasibility options and on-scene coordination for state superfund incidents. The program also provides for the oversight, investigation and remediation of unauthorized releases from underground tanks.

San Benito County Emergency Operations Plan

The San Benito County Emergency Operations Plan (EOP) (2005) provides guidance for County response to extraordinary emergency situations associated with natural disasters, technological incidents, and nuclear defense operations - both war and peacetime. The plan concentrates on operational concepts and response procedures relative to large scale disasters, and addresses operations for the entire County.

3.7.3 IMPACTS AND MITIGATION MEASURES

STANDARDS OF SIGNIFICANCE

The following thresholds for measuring a project's environmental impacts are based upon the CEQA Guidelines and standards used by San Benito County. For the purposes of this EIR, impacts are considered significant if the following could result from implementation of the proposed project:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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 (during operation or construction);
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school;
- Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result would create a significant hazard to the public or the environment;
- Be located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public or private airport, public use airport, or private airstrip, and thus result in a safety hazard for people residing or working in the project area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or,
- Expose people or structures to a significant risk or loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

METHODOLOGY

Earth Systems Pacific (ESP) prepared a *Phase I Environmental Site Assessment and Limited Phase II Soil Testing* report (ESA) for the proposed project in August 2009. The report is included in this EIR within **Appendix F**.

Preparation of the *ESA* included a site reconnaissance, site history investigation, regulatory agency record review, and limited soil testing. The site reconnaissance included a visual inspection of site conditions, interviews with persons familiar with the present and previous use of the project site, and a review of adjacent properties to identify possible sources of contamination on the project site. The historical investigation included reviews of onshore oil and gas maps for San Benito and Monterey Counties, aerial photos, historical data on zoning, land use, land title and deed, environmental cleanup liens and previously prepared Phase I

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ESAs, Sanborn Maps, landslide hazards information for the Hollister area, and groundwater data were also reviewed.

The limited soil investigation portion of the ESA included testing of four shallow soil samples collected in the vicinity of the residence at 2111 Fairview Road, and four soil borings near the former gas station building at 2201 Fairview Road. The shallow soil samples were collected at an approximately half-foot depth. The soil borings were collected at five foot vertical increments to depths between 11 and 21 feet. The samples were tested for organochlorine pesticides, petroleum hydrocarbons (gasoline, diesel and motor oil); and fuel compounds such as benzene, toluene, ethylbenzene, xylene, and the fuel additive MTBE. Results of the soil testing are discussed below in **Project Impacts and Mitigation Measures, Impact 3.7-2**.

PROJECT IMPACTS AND MITIGATION MEASURES

Transport, Use, Disposal or Upset of Hazardous Materials

Impact 3.7-1 Implementation of the proposed project could result in the development of an on-site wastewater treatment plant that could potentially create a significant hazard to the public (including future students of the proposed school) or the environment through the routine transport, use, disposal or upset of hazardous materials associated with the plant. This would be considered a **potentially significant impact**.

The project could potentially be served by an on-site site wastewater treatment plant (WWTP), in the unlikely event that the project does not secure a connection to the Hollister Domestic Wastewater Treatment Plant. The on-site WWTP would be located on an approximately 26-acre site at the northeastern boundary of the Plan Area, approximately 500 yards south of Mansfield Road. A full description of the plant design and operations, as well as potential hazards, is included in **Section 3.14** of this EIR, **Wet and Dry Utilities**. In summary, on-site treatment plants are highly regulated facilities incorporating numerous design and operational features intended to minimize the potential for release of hazardous substances into the environment. These features are described in Section 3.14, and include seismic design requirements, minimum standards for final effluent water quality and irrigation, and permitting requirements by the Regional Water Quality Control Board for the design and operation of the plant, including regular monitoring. As required by Mitigation Measures 3.7-1, below, with implementation of these required design and operational features, and verification through the RWQCB permitting process, potential hazards to the future residents of the project, students attending the proposed school, and the environment associated with the operation of the potential WWTP are anticipated to be **less than significant**. Please refer to **Section 3.14** for complete discussion on the plant.

MM 3.7-1 If the on-site wastewater treatment facility option is selected, the plant shall be designed, permitted and operated in accordance with local, state and federal regulations. The design of the plant shall be reviewed and approved by the Department of Public Works, the Regional Water Quality Control Board, and any other agencies as required by law.

Natural Gas Pipeline

Impact 3.7-2 Development of the project in the vicinity of the underground natural gas pipeline may expose people to risk of upset conditions associated with a potential natural gas release or explosion. This is considered a **potentially significant impact**.

A PG&E underground natural gas pipeline traverses the northeast portion of the project site in a northwest to southeast alignment. Title 5 of the California Code of Regulations, Section 1401(h) stipulates that: "(A school) site shall not be located ... within 1,500 feet of the easement of an above-ground or underground pipeline that can pose a safety hazard as determined by a risk analysis study ...". On July 23, 2008, a Natural Gas Pipeline Risk Analysis was performed by Kleinfelder, Inc., using the most recent protocol for such analysis prepared under the direction of the California Department of Education (CDE). The protocol provides a method to quantify the individual risk criterion based, in part, on the distance between a hazardous material pipeline and an actual proposed school site, the diameter of the pipeline, the operating pressure, the material transported, and the actual or estimated population of the school. Based on a review of these factors, as well as other technical criteria discussed within the analysis, the risk to the potential school associated with natural gas pipeline fire or explosion was determined to be less than one in one million. On this basis, the analysis concluded that the operation of the school as sited would not require any special mitigation measures.

If disturbed during construction activities, however, there would be a risk of fire or explosion to construction workers on the site. The following mitigation measures will ensure that project construction is carried out in a manner that minimizes the risk for disturbance to the pipeline:

MM 3.7-2a Prior to issuance of the first grading permit for the project, the developer shall coordinate with PG&E representatives to ensure proper information is exchanged and protocols followed so that the existing pipeline is not disturbed. Digging and earthmoving activities in the immediate vicinity of the pipeline shall be monitored, and the pipeline right of way shall be accurately marked prior to construction.

MM 3.7-2b The gas pipeline right of way and linear park shall be indicated on all site plans for project development in the immediate vicinity of the pipeline, consistent with the overall conceptual site plan for the project.

MM 3.7-2c All project site plans for school facilities shall conform with Title 5 of the California Code of Regulations and California Education Code, and shall be consistent with the overall conceptual site plan for the project.

Implementation of the above mitigation measures would reduce risk of pipeline leaks by coordinating construction activities with PG&E, monitoring the pipeline for leaks, and verification of project site plans, including the school site, are consistent with the overall conceptual site plan for the specific plan, thereby reducing this impact to a **less than significant** level.

Exposure to Soil Contamination

Impact 3.7-3 Development of the proposed project may expose people, property or the environment to risks associated with soil contamination from hazardous and potentially hazardous material at the project site, including pesticide residues and petroleum hydrocarbons. This is considered a **potentially significant impact**.

The portion of the project site located near 2111 Fairview Road contains a walnut orchard. In addition, a former "gas station" building has been identified at 2201 Fairview Road. Soil testing was conducted to evaluate the presence of chlorinated pesticides at 2111 Fairview Road and screen soils for petroleum hydrocarbons at the former gas station building and above ground storage tanks at 2201 Fairview Road. The results of these soil tests are summarized below.

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Pesticides

According to the ESA, a soil sample collected in the vicinity of the residence located at 2111 Fairview Road detected DDE at a concentration of 0.0031 parts per million (ppm). DDE was not detected in the other soil samples.

DDE is a product of the decomposition of DDT, an insecticide, and is classified by the EPA as a probable carcinogen. DDE poisoning can cause hypersensitivity to stimulation, sensation of prickling, tingling or creeping on skin; headache, dizziness, nausea, vomiting, tremor, mental confusion, hyper-excitability state, and in severe cases, convulsions, seizures, coma and respiratory depression. Exposure to DDE can be through food, air, soil and residential contact.

The concentration of DDE in the soil, however, is below the U.S. EPA Preliminary Remediation Goals and California Human Health Screening Levels thresholds for residential settings. Therefore, this would be considered a **less than significant impact**, and does not present an acute risk to future residents of the project. No mitigation measures are necessary.

Petroleum Hydrocarbons

Due to the presence of a former gas station building and above ground storage tanks in the vicinity of 2201 Fairview Road, soil samples at four borings were collected and tested for total petroleum hydrocarbons (gasoline, diesel and motor oil); the fuel compounds benzene, toluene, ethylbenzene, xylenes (BTEX); and the fuel additive MTBE. Petroleum hydrocarbons, fuel compounds and the fuel additive MTBE were not detected in the soil samples collected. Therefore, there would be **no impact** associated with exposure to petroleum hydrocarbons.

Observed/Potential Soil Staining

Soil staining was observed at 2201 Fairview Road in the area where numerous five-gallon buckets are located, as well as near a trailer-mounted fuel storage tank at 2111 Fairview Road. In addition, the existing septic pit may be another source of contamination. Exposure to areas with soil contamination and or contamination of the groundwater due to soil contamination would be considered a **potentially significant impact**. Implementation of the following mitigation measures would reduce this impact to a less than significant level.

MM 3.7-3a Prior to issuance of building and grading permits, the developer shall contract with a licensed professional to collect and properly dispose of all buckets, drums, and stained soils in the vicinity of 2201 Fairview Road, and stained soil within the vicinity of the trailer-mounted storage tank located at 2111 Fairview Road. If soil staining is present anywhere at depths greater than one foot, a licensed professional shall collect soil samples for laboratory testing. Appropriate mitigation, as determined by the licensed professional and the County, based on the results of the laboratory testing, shall be funded and implemented by the developer.

MM 3.7-3b Prior to demolition, the developer shall contract with a licensed professional to properly remove any septic tanks or pits. If unusual odors or staining are present upon removal of the septic tanks or pits, the developer shall contract with a licensed professional to collect soil samples for laboratory testing from beneath the septic tanks and/or pits. Appropriate mitigation, as determined by the licensed professional and the County, based on the results of the laboratory testing, shall be funded and implemented by the developer.

Implementation of the above mitigation measures would reduce exposure to soil contamination by removing stained soils, and potential sources of contamination such as buckets, drums and septic tanks/pits, and therefore reduce the impact to **less than significant**.

Hazardous Materials Sites

Impact 3.7-4 Development of the proposed project, which includes a school, could potentially expose people, property or the environment to risks associated with off-site surrounding uses that are currently listed as using, storing, generating or releasing hazardous materials. However, the distance between identified hazardous material sites and the project site would serve to minimize risks of exposure. Therefore, this is considered a **less than significant** impact.

According to the ESA, two potential hazardous material sites in the surrounding area were identified. The three sites are discussed below:

PG&E Hollister Maintenance Station: The PG&E Hollister Maintenance Station site is located at 1980 Santa Ana Road, approximately 0.6 miles northwest of the project site. In 1987, 62.2 tons of contaminated soil was identified. A site screening was conducted and no further action was recommended. Since this site is located more than one half mile from the project site and based on the type of listing, this hazardous site would not pose a significant risk to the proposed project.

United Defense: The United Defense site is located at 900 John Smith Road, approximately 0.5 mile southeast of the project site. This site was formerly used to test munitions and field test military vehicles and their weapons systems. Currently there is a preliminary assessment for "soil only" contamination being conducted due to the potential presence of perchlorate at the facility. Since this site is located one half mile from the project site and based on the type of listing, potential soil contamination, this listed hazardous site would not pose a significant risk to the proposed project.

Due to the factors of distance and/or absence of recorded release of hazardous materials, the project would not be impacted by the facilities listed above, resulting in a **less than significant** impact. No mitigation measures are necessary.

Asbestos and Lead-Based Building Materials

Impact 3.7-5 Development of the proposed project will result in the demolition of existing structures, which could contain asbestos or lead based building materials. This is considered a **potentially significant impact**.

Given the age of the on-site structures (1950s/1970s), the exterior paint may contain lead and interior construction materials may contain asbestos. Exposure to these materials can be hazardous to human health, especially during demolition when they can become friable and inhaled, which would be considered a **potentially significant impact**. The following mitigation measure has been provided to ensure that any asbestos or lead-based construction materials are identified prior to demolition and properly disposed of, which would reduce this impact to a less than significant level by requiring removal in accordance with state and federal regulations.

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MM 3.7-5 Prior to demolition of the existing on-site structures, the interiors shall be inspected for the presence of asbestos-containing materials, and the exterior paint shall be tested for possible lead content. If asbestos-containing materials or peeling lead-based paint are found, they shall be removed in accordance with the required protocols prior to general demolition.

Implementation of the above mitigation measure would minimize exposure to asbestos and lead and reduce this impact to a **less than significant** level.

Existing Wells

Impact 3.7-6 Development of the proposed project could result in the contamination of groundwater through release of material into existing, on-site wells. This is considered a **potentially significant impact**.

Materials used during the construction and operation of the project could potentially be released into the groundwater via existing on-site wells that are not proposed for continued use for the project, resulting in potential groundwater contamination. This would be considered a **potentially significant impact**. The following mitigation measure has been provided to ensure that contamination in this manner is prevented, thereby reducing this potential impact to a **less than significant** level.

MM 3.7-6 Prior to issuance of the first grading permit for the project, all existing on-site wells shall be capped and/or filled to the satisfaction of the San Benito County Health Department.

Airport Noise and Safety Hazards

The project site is located more than three miles from the Hollister Municipal Airport, is not located within the applicable Airport Land Use Plan, and is therefore not subject to a level of risk of noise or accident that would warrant special mitigation measures. **No impact** is anticipated.

Emergency Operations Plan

The current San Benito County Emergency Operations Plan contains procedures for responding to various types of large-scale emergencies within San Benito County, and defines emergency response and management roles for County officials. The ability of the County to implement the emergency response and management activities defined within the plan is dependent upon the availability of roadways for emergency access where needed. All public roadways within the Santana Ranch project will be required to be constructed in accordance with County standards, and will therefore not impede transportation activities associated with large scale emergency response within the County. **No impact** is therefore anticipated.

Wildland Fire

Wildland fire impact may be considered significant if the proposed project would 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. The project site is classified within the "moderate" fire severity zone, by the San Benito County Fire Hazard Severity Zone Map (11/7/07). However, the project site is not located in an area prone to wildland fire or excessive fuel loading, and is readily accessible to emergency and fire personnel should an incident occur. Therefore the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires and **less than significant impacts** are anticipated.

CUMULATIVE IMPACTS AND MITIGATION MEASURES

Risk of Exposure to Hazardous Waste or Materials

Impact 3.7-7 Implementation of the proposed project in addition to past, present and reasonably foreseeable, probable future projects as listed within **Chapter 5.0, Cumulative Impacts Summary**, may result in cumulative hazardous risk impacts. This is considered a **less than significant** impact.

Implementation of the proposed project would result in potential short-term impacts during construction activities associated with exposure to hazardous substances such as waste oil and hazards due to abandoned septic systems and water wells. However, hazardous materials impacts would be site-specific and are generally not affected by cumulative development in the region. As described in this section, with proper implementation of mitigation measures incorporated herein, the proposed project would not contribute to an increase in the potential for soil or groundwater contamination or the potential risk of upset as a result of current or past land use. The proposed project will not combine with any planned growth in the area to cause an impact greater or more significant than the project impact alone, or result in incremental impacts associated with hazards or hazardous materials in combination with other past, present, or reasonably foreseeable, probable future projects, that would be considered significant. Therefore, the cumulative impact of the project is considered **less than significant**.

3.7 HAZARDS AND HAZARDOUS MATERIALS

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