IV. ENVIRONMENTAL IMPACT ANALYSIS
H. HAZARDS & HAZARDOUS MATERIALS

INTRODUCTION

This section of the Revised Draft EIR provides a description of hazards and hazardous materials within the City of Healdsburg, information on regulations and agencies with jurisdiction over the Project area, proposed General Plan policies relevant to hazards and hazardous materials, and an analysis of potential impacts related to hazards and hazardous materials resulting from implementation of the proposed General Plan. Information used to prepare this section was taken from the *Healdsburg 2030 General Plan Background Report* (January 2009 Draft), *California Health and Safety Code,* and the *Comprehensive Airport Land Use Plan for Sonoma County* (October 2001).

ENVIRONMENTAL SETTING

Physical Setting

Hazardous Materials

Hazardous materials are substances that, because of their quantity, concentration, or physical or chemical characteristics, pose 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 the environment.[1] Hazardous materials have been and are commonly used within the city in commercial, agricultural, and industrial applications as well as limited uses in residential areas.

Hazardous materials can result in public health hazards if released to the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of constituents higher than certain regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. Hazardous waste is any hazardous material that is discarded, abandoned, or is to be recycled. The criteria that render a material hazardous also make its waste hazardous.[2] The California Code of Regulations, Title 22, Sections 66261.20-24 contains technical descriptions of characteristics that could cause soil or groundwater to be classified as hazardous waste.

According to the State's Enviro-Stor Database compiled pursuant to Government Code Section 65962.5, there is one state response site in the city, located at 33 Healdsburg Avenue. An underground solvent

---

1 *California Health and Safety Code, Section 25501.*

2 *California Health and Safety Code, Section 25151.*

tank was removed from the site along with 50 cubic yards of soil, and leakage was detected from the tank. Liquid from the excavation had up to 368 parts per billion (ppb) TCE. This tank was considered to be the source of the TCE that contaminated the groundwater. The North Coast Regional Water Quality Control Board took the lead to delineate the extent of TCE contamination and proceed with remedial action. Extraction and treatment of groundwater began operating in June 1984 and shut off in September 1993. Groundwater monitoring is still occurring.[3]

Hazardous materials are used in the city for industrial, commercial, and household purposes, and regulated by multiple agencies in federal, state, and local governments. These regulations are intended to protect both the environment and public health and safety from improper use, handling, storage, and transport of hazardous materials and hazardous waste. The City of Healdsburg Fire Department (HFD) has been delegated with the responsibility of dealing with hazardous materials within two respective disciplines: response to hazardous materials releases and administration of a variety of state regulatory programs for controlling risks from hazardous material use, storage, and disposal.

The HFD responds to all reported releases of hazardous materials and has been assigned the authority as Incident Scene Manager pursuant to City Ordinance 871. In accordance with state training requirements, all HFD personnel are trained to the First Responder Operational level, while department officers are trained to the Incident Commander level. Although the City contracts with the County of Sonoma for a Hazardous Materials Entry Team when required, the HFD performs multiple roles such as Incident Commander, Safety Officer, Decontamination, and perimeter security.

Due to the extended nature of releases, hazardous materials incidents can be very taxing upon the resources of the HFD. In 1999, a release of a corrosive solution into Foss Creek involved the resources of the HFD for almost a week. As an agency that depends heavily upon reserve personnel, it has become difficult to maintain the staffing necessary for incidents with such duration.

As part of its administrative responsibility, the HFD has been certified as a Certified Unified Program Agency (CUPA). The CUPA consists of six programs: Hazard Material Business Plan (HMBP - also part of the California Fire Code); Risk Management Plan (California Accidental Release Prevention Program); Underground Storage Tank Systems; Hazardous Waste Generator Program (control of persons or businesses generating hazardous waste), Hazardous Waste Treatment, and Above Ground Storage of Petroleum Products.

The CUPA is responsible for issuing permits, performing inspections, issuing reports, enforcement orders, citations, pursuing criminal and civil actions as necessary and collecting penalties for any required mitigation of violations. In addition, certain reporting and auditing requirements must be performed and forwarded to the State each year.

---

[3] *Department of Toxic Substances Control, Enviro-Stor Database, website: http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=49380002, October 4, 2007.*

The program is required to be self-supporting by fees collected from issuing permits under the program. An analysis of the program costs has been performed to establish the current fees that are periodically re-evaluated and raised as needed.

The HFD issued its most current annual report/audit of the program in January 2008. At that time, the city had 151 regulated businesses. Of that number, all fell into the HMBP Program, 65 into the Hazardous Waste Generator Program. Eighteen were subject to the Underground Storage Tank Regulations, one to the CalARP program, and two to the Waste Treatment requirements. Of the 151 regulated businesses, 86 had received an annual inspection, while 34 of the regulated businesses were permitted to perform self-inspections.

In addition to commercial/industrial hazardous materials, household hazardous materials are generated in the city. Hazardous waste generated in homes includes products such as paint, batteries, fertilizers, and used motor oil. Wastes can be disposed of two ways - at the Household Hazardous Waste Collection Facility at the Central Landfill and through local collection events held by the Sonoma County Waste Management Agency program. In 2007, three such events were held in Healdsburg at the City Corporation Yard.

A serpentine knoll was identified in the southwest corner of the Saggio Hills project site in the area planned for the community park. Laboratory analysis determined that the serpentinite contains the chrysotile form of asbestos in concentrations ranging from trace amounts (less than 0.25%) to 1.40%. NOA is regulated by ARB, and concentrations of NOA above 0.25% are considered by ARB as hazardous levels for residential development. Therefore, NOA on the project site could pose a health hazard to construction workers and future residents if fragments were to become airborne and inhaled.

Fire Hazards

Figure IV.H-1 depicts the areas of high fire hazard as identified by the California Department of Forestry and Fire Protection (CALFIRE). The zone of high fire hazard includes much of Fitch Mountain and the wooded and brush-covered ridges in Sub-Areas B and C. The concern in this zone is primarily for fire equipment accessibility, and the interface between flammable wildland vegetation and residential structures. Existing streets in the Fitch Mountain area, both within city limits and within county jurisdiction, are relatively narrow and include sharp turns and dead ends. Because of these constraints, the City uses smaller apparatus to respond to fires in this area. In addition, the existing water system in the area has limited storage capacity, particularly in the Cadoul Zone.

Risk Reduction Measures

Healdsburg has required the installation of sprinkler systems in all new buildings since 1987 and encourages them in existing structures. Sprinklers reduce the overall amount of water needed to control structural fires by 50 to 75 percent. The City's requirement for fire sprinklers in all new development also reduces fire risks, since the systems are extremely effective in extinguishing structure fires. Other

This page intentionally left blank.

Figure IV.H-1 Wildland High Fire Hazard Zone

This page intentionally left blank.

requirements under the City fire code include fire-resistant roofing, minimum hydrant spacing, the provision of more than one access road into new development and vegetation clearance around structures and along roads in areas with wildland fire hazards.

Fire reduction measures have also been adopted by the City for specific plan areas, including Sub-Area A (see Figure III-7). These include construction and maintenance of fuel breaks, management of fire-prone vegetation along streets, maintenance of clearances around structures, providing minimum street widths and turning radii, limiting the lengths of cul-de-sacs and dead end streets, limiting excessive street grades and requiring at least two access roads in and out of developed areas.

Healdsburg Municipal Airport

Limited air transportation service is available at the Healdsburg Municipal Airport located on Lytton Springs Road north of the city. This airport has a 3,100-foot runway capable of handling small jets. Facilities at the airport include hangars, maintenance buildings, commercial buildings, and fuel storage and pumps. However, there is no control tower, nor is it regularly staffed. The airport serves primarily the needs of the wine and geothermal industries together with recreational flyers, and is occasionally used when the Sonoma County Airport is fogged in and for medical emergencies. Operation of the Healdsburg Municipal Airport may expose city residents within the airport's land use plan to hazards relating to landing and take-off of aircraft.

Regulatory Setting

Federal

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (EPA) is the agency primarily responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are contained mainly in Code of Federal Regulations (CFR) Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. Management of hazardous materials is governed by the following laws:

- Resource Conservation and Recovery Act of 1976 (RCRA) (42 U.S. Code [USC] 6901 et seq.);
- Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA, also called the Superfund Act) (42 USC 9601 et seq.); and
- Superfund Amendments and Reauthorization Act (SARA) of 1986 (Public Law 99–499).

These laws and associated regulations include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. EPA provides oversight and supervision for federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

Hazardous Substances

Hazardous substances are a subclass of hazardous materials. They are regulated under CERCLA and SARA. Under CERCLA, EPA has authority to seek the parties responsible for releasing hazardous substances and to ensure their cooperation in site remediation. CERCLA also provides federal funding (the "Superfund") for remediation.

SARA Title III, the Emergency Planning and Community Right-to-Know Act, requires companies to declare potential toxic hazards to ensure that local communities can plan for chemical emergencies. EPA maintains a National Priority List of uncontrolled or abandoned hazardous waste sites identified for priority remediation under the Superfund program. EPA also maintains the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database, which contains information on hazardous waste sites, potential hazardous waste sites, and remedial activities across the nation.

Hazardous Wastes

Hazardous wastes, although included in the definition of hazardous materials and hazardous substances, are regulated separately under RCRA. Waste can legally be considered hazardous if it is classified as ignitable, corrosive, reactive, or toxic. Title 22, Section 66261.24 of the California Code of Regulations (CCR) defines characteristics of toxicity. Under RCRA, EPA regulates hazardous waste from the time that the waste is generated until its final disposal. RCRA also gives EPA or an authorized state the authority to conduct inspections to ensure that individual facilities are in compliance with regulations, and to pursue enforcement action if a violation is discovered. EPA can delegate its responsibility to a state if the state's regulations are at least as stringent as the federal ones. RCRA was updated in 1984 by the passage of the federal Hazardous and Solid Waste Amendments, which required phasing out land disposal of hazardous waste.

Regulation of Pesticides

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) provides 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. Later amendments to the law required users to take exams for certification as applicators of pesticides. All pesticides used in the United States must be registered (licensed) by EPA. Registration assures that pesticides will be properly labeled and that if used in accordance with specifications, they will not cause unreasonable harm to the environment.

Regulation of Asbestos

The federal Clean Air Act requires the EPA to develop and enforce regulations to protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112 of the Clean Air Act, EPA established National Emissions Standards for

Hazardous Air Pollutants (NESHAP) to protect the public. Asbestos was one of the first hazardous air pollutants regulated under Section 112. The asbestos NESHAP regulations protect the public by minimizing the release of asbestos fibers during activities involving the processing, handling, and disposal of asbestos-containing material. Accordingly, the asbestos NESHAP regulations specify work practices to be followed during demolitions and renovations of all structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). In addition, the regulations require the owner of the building and/or the contractor to notify applicable state and local agencies and/or EPA regional offices before all demolitions, or before renovations of buildings that contain a certain threshold amount of asbestos. Asbestos containing materials must be removed under controlled conditions before demolitions so that asbestos fibers are not released into the air, and asbestos-containing waste materials must be sealed in leak-tight, properly labeled containers and disposed of only at approved sites.

Worker Health and Safety Regulations

Worker health and safety is regulated at the federal level by the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA). Under this jurisdiction, workers at hazardous waste sites (or workers coming into contact with hazardous wastes that might be encountered during excavation of contaminated soils) must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations.

Federal Aviation Administration

Part 77 of the Federal Aviation Regulations (FAR), "Objects Affecting Navigable Airspace," has been adopted as a means of monitoring and protecting the airspace required for safe operation of aircraft and airports. Objects that exceed certain specified height limits constitute airspace obstructions. FAR Part 77 requires that the Federal Aviation Administration (FAA) be notified of certain proposed construction or alteration of objects within a specified vicinity of an airport:

> *[Section] 77.13 Construction or alteration requiring notice. (a) Except as provided in [Section] 77.15, each sponsor who proposes any of the following construction or alteration shall notify the Administrator in the form and manner prescribed in [Section] 77.17. (1) Any construction or alteration of more than 200 feet in height above the ground level at its site. (2) Any construction or alteration of greater height than imaginary surface extending outward and upward at one of the following slopes: (i) 100 to 1 for horizontal distance of 20,000 feet from the nearest point of the nearest runway of each airport specified in paragraph (a)(5) or this section with at least one runway more than 3,200 feet in actual length, excluding heliports. (ii) 50 to 1 for horizontal distance of 10,000 feet from the nearest point of the nearest runway of each airport specified in paragraph (a)(5) of this section with its longest runway no more than 3,200 feet in actual length, excluding heliports. (iii) 25 to 1 for a horizontal distance of 5,000 feet from the nearest point of the*

> *nearest landing and takeoff area of each heliport specified in paragraph (a)(5) of this section.*

Section 77.17 states that FAA Form 7460-1, "Notice of Proposed Construction or Alteration," must be sent to the Air Traffic Division of the nearest FAA Regional Office at least 30 days before the date the proposed alteration is to begin, or the date an application for a construction permit is to be filed, whichever is earlier.

Occupational Health and Safety Administration

The Occupational Safety and Health Administration (OSHA) of the U.S. Department of Labor is responsible for enforcement and implementation of federal laws and regulations pertaining to worker health and safety. Workers at hazardous waste sites must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response regulations.

State

Certified Uniform Program Agency Plans, Programs, and Permits

Hazardous Waste Generator Requirements

Facilities that generate more than 100 kilograms per month of hazardous waste or more than 1 kilogram per month of acutely hazardous waste must be registered in accordance with the Resource Conservation and Recovery Act (RCRA).

Aboveground (AST) and Underground Storage Tank (UST) Permits

Facilities with ASTs or USTs must have permits. Other plans, such as a Spill Prevention Control and Countermeasures (SPCC) Program, may be required due to the size and type of hazardous materials stored in the ASTs. The SPCC Program provides a detailed engineering analysis of the potential for release from oil-filled equipment, and describes the measures, such as secondary containment and emergency response, that must be implemented to reduce the release potential.

Hazardous Materials Business Plan (Business Plan)

Facilities that use, store, or handle hazardous materials in quantities greater than 500 pounds, 55 gallons, or 200 cubic feet are required to prepare a Business Plan and comply with Uniform Fire Code requirements for storage of hazardous materials. The Business Plan must contain facility maps, up-to-date inventories of all hazardous materials for each shop/area, locations of product transfer areas, emergency response procedures, equipment, and a description of employee training.

Hazardous Material Release Response Plan (Contingency Plan)

All facilities that generate hazardous waste must prepare a Contingency Plan. The Contingency Plan identifies the duties of the facility Emergency Coordinator and location of emergency equipment, and includes reporting procedures for the facility Emergency Coordinator to follow after a hazardous materials incident.

California Accidental Release Program (CalARP)

Businesses that use significant quantities of acutely hazardous materials must prepare a detailed engineering analysis of the potential accident factors present at a business and the mitigation measures that can be implemented to reduce this accident potential. CalARP requirements typically apply to heavy industrial properties such as factories and refineries.

Other State Plans, Programs, and Permits

Injury and Illness Prevention Plans

The California General Industry Safety Order requires that all employers in California prepare and implement an Injury and Illness Prevention Plan, which should contain a code of safe practice for each job category, methods for informing workers of hazards, and procedures for correcting identified hazards.

Emergency Action Plans

The California General Industry Safety Order requires that all employers in California prepare and implement an Emergency Action Plan. The Emergency Action Plan designates employee responsibilities, evacuation procedures and routes, alarm systems, and training procedures.

Fire Prevention Plans

The California General Industry Safety Order requires that all employers in California prepare and implement a Fire Prevention Plan. The Fire Prevention Plan specifies areas of potential hazard, persons responsible for maintenance of fire prevention equipment or systems, fire prevention housekeeping procedures, and fire hazard training procedures.

Hazard Communication Plans

Facilities involved in the use, storage, and handling of hazardous materials are required to prepare a Hazard Communication program. The purpose of the Hazard Communication program is to provide methods on safe handling practices for hazardous materials, ensure proper labeling of hazardous materials containers, and ensure employee access to Material Safety Data Sheets (MSDS).

Air Quality Permits for Stationary Sources

Facilities that emit pollutants into the air from sources other than motor vehicles and consumer products are required to have permits from the Bay Are Air Quality Management District (BAAQMD). (See Section IV.D [Air Quality] for details on air permitting requirements and toxic air contaminants.)

Worker Health and Safety Regulations

Worker health and safety is regulated at the federal level by the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA). Under this jurisdiction, workers at hazardous waste sites (or workers coming into contact with hazardous wastes that might be encountered during excavation of contaminated soils) must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations.

Worker health and safety in California is regulated by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA). California standards for workers dealing with hazardous materials (including hazardous wastes) are contained in CCR Title 8 and include practices for all industries (General Industrial Safety Orders), and specific practices for construction, and hazardous waste operation and emergency response. Cal/OSHA conducts on-site evaluations and issues notices of violation to enforce necessary improvements to health and safety practices.

Wildland Fire Safety (State Responsibility Areas)

State Responsibility Areas include areas of the state where the financial responsibility of preventing and suppressing fires has been determined (pursuant to Section 4125 of the Public Resources Code) to be primarily the responsibility of the state. In recognition of the severity of wildland fire hazards in certain areas of California, the state enacted legislation (see California Public Resources Code, Section 4291) requiring local jurisdictions to adopt minimum recommended standards pertaining to road standards for fire equipment access and standards for identifying streets, roads, and buildings; to specify minimum private water supply reserves for emergency fire use; and to require fuel breaks and greenbelts to achieve fuel reductions. With certain exceptions, all new development and construction in State Responsibility Areas after July 1, 1991 must meet the new standards. The state requirements do not supersede more stringent local regulations.

California Office of Emergency Services

The California Office of Emergency Services (Cal/OES) is the state office responsible for establishing emergency response and spill notification plans related to hazardous materials accidents. Cal/OES regulates businesses by requiring them to prepare an inventory of hazardous materials.

California Department of Transportation and California Highway Patrol

The California Department of Transportation (Caltrans) and California Highway Patrol (CHP) enforce and monitor U.S. Department of Transportation hazardous materials and waste transportation laws and

regulations in California. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roads. All motor carriers and drivers involved in transportation of hazardous materials must apply for and obtain a hazardous materials transportation license from CHP. When transporting explosives, inhalation hazards, and highway route–controlled quantities of radioactive materials, safe routing and safe stopping-places are required, as described in 26 CCR Section 13 et seq. A route map must be carried in the vehicle.

California Public Utilities Code Sections 21670-21679.5

Public Utilities Code Sections 21670-21679.5 establish the authority of county airport land use commissions (ALUC) within the State of California for the purposes of protecting public health, safety, and welfare through planned development of airports and their surrounding areas. It is the responsibility of the airport land use commissions to ensure the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public incompatible uses.

Regional/Local

Comprehensive Airport Land Use Plan for Sonoma County

The Comprehensive Airport Land Use Plan for Sonoma County (CALUP) includes a description of the referral area boundaries, noise compatibility standards, safety compatibility standards, airspace protection standards, and other land use policies for the six public use airports in the county including the Healdsburg Municipal Airport. The various airport compatibility standards are to be applied comprehensively. Where any parcels of land are subject to more than one set of land use compatibility standards or policies, the most restrictive standard shall apply. Policies included in the CALUP only apply to new development; existing development is exempt.

Septic System Permits

The Sonoma County Permit and Resource Management Department (SCPRMD) requires permits for operation of sewage disposal systems. Septic systems must be designed by a qualified environmental professional and all SCPRMD requirements for soils analysis, percolation testing, groundwater testing, and design elements must be satisfied to obtain the permit.

Water Quality Control Plan for the North Coast Region

The Basin Plan, as amended through 2001, defines the beneficial uses, water quality objectives, implementation programs, and monitoring programs for waters of the North Coast Region, which includes Foss Creek and therefore the Planning Area. The North Coastal and Klamath River Basin Plans adopted in 1975 were combined into a single comprehensive Basin Plan, adopted in 1993 by the North Coast RWQCB and most recently updated in 2001. The Basin Plan contains both narrative and numeric water quality objectives for the region. Two types of water quality standards are discussed: ambient water quality objectives and effluent limits (or discharge standards). The former are standards set as objectives for a body of water. The latter are conditions in federal or State wastewater discharge permits, such as the NPDES permits. The Basin Plan also identifies land uses and activities that could degrade water quality and discusses BMPs that could be used to address various nonpoint sources of pollution.

PROPOSED GENERAL PLAN POLICIES AND IMPLEMENTATION MEASURES

Proposed General Plan policies and implementation measures that affect or pertain to hazards and hazardous materials are listed below.

Policies

- *T-A-4:* New local streets shall ensure direct and adequate access to properties for emergency service vehicles.
- *T-A-12*: The City will strive to complete links in the existing street system to improve continuity and provide emergency vehicle access, subject to fiscal and geological limitations.
- *T-F-3:* The policies and capital improvement projects contained in the Airport Master Plan shall be pursued as funding allows.
- *S-D-1*: Areas of high fire hazard as shown in General Plan Figure 9 [Figure IV.H-1] shall be designated for open space or low-intensity uses.
- *S-D-2:* The City shall promote the active and continuous involvement of government, industry, and citizens in all aspects of fire prevention and control.
- *S-D-4*: All new development designated as being in a wildland high fire hazard zone shall:
  - (a) Be constructed to meet wildland urban interface standards as required by the California Fire & Building Code.
  - (b) Implement and maintain vegetation management plans around all structures in accordance with state and local standards.
- *S-D-5:* The City will seek to minimize response time to fires.
- *S-F-1*: The City shall ensure that adequate emergency procedures are in place to respond to and recover from man-made and natural disasters.
- *S-H-1*: The City shall regulate the production, use, storage and transport of hazardous materials.
- *S-H-2:* The City shall protect new development from existing hazardous materials.

Policy Implementation Measures

- *T-19:* Pursue the policies and capital improvement projects contained in the Airport Master Plan as funding allows.
- *S-4:* Maintain and periodically update the City's Emergency Operations Plan, Recovery Manual and Hazard Mitigation Plan. As part of the periodic updates, the City shall review county and state emergency response procedures to ensure that they are coordinated with city procedures.
- *S-5:* Conduct periodic emergency response exercises to test the effectiveness of city emergency response procedures.
- *S-7:* The City Fire Department will ensure that owners of all structures constructed in areas designated as high fire severity zones as identified by CalFire or the General Plan will perform and maintain vegetation management around said structures.
- *S-8:* All plans for new streets shall be reviewed by the Fire Department to ensure minimum standards for width, turning radius, and grade to facilitate access by City firefighting apparatus are met.

- *S-26:* City approvals of all new development shall consider the potential for the production, use, storage, and transport of hazardous materials and provide for reasonable controls on such hazardous materials.
- *S-27*: Require the City's waste collection franchisee to provide curb-side collection of used motor oil and filters and provide disposal containers for this purpose.
- *S-28:* Prepare and disseminate to affected parties a map of sites within the Planning Area that have been identified by the State Water Resources Control Board as having contaminated soil or water.

ENVIRONMENTAL IMPACTS

Methodology

Impacts associated with hazards and hazardous materials were evaluated based on the information found within the *Healdsburg 2030 General Plan Background Report* and the *Comprehensive Airport Land Use Plan for Sonoma County*.

Thresholds of Significance

In accordance with Appendix G to the CEQA Guidelines, the proposed Project would have a significant impact related to hazards and hazardous materials if it 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 one-quarter mile of an existing or proposed school;

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

(e) Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, such that a safety hazard would result for people residing or working in the project area;

(f) Be located within the vicinity of a private airstrip, such that a safety hazard would result 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.

Project Impacts

Impact IV.H-1: The proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Buildout under the proposed Project could result in the additional transport, use and disposal of hazardous materials. The types of potentially hazardous materials associated with residential units include solvents, paint, batteries, fertilizers, and petroleum products that are packaged and stored for consumer sales. The household transport and storage of these materials would not pose a significant hazard to the public or the environment because household hazardous materials can be disposed of in two ways - at the Household Hazardous Waste Collection Facility at the Central Landfill and through local collection events held by the Sonoma County Waste Management Agency program. Therefore, Project impacts related to residential hazardous materials would be less than significant.

As discussed above, there were 151 businesses in the city that stored hazardous waste onsite according to the most current annual report/audit of the program issued by the HFD in January 2008. Of that number, all fell into the HMBP Program, 65 into the Hazardous Waste Generator Program. Eighteen were subject to the Underground Storage Tank Regulations, one to the CalARP program, and two to the Waste Treatment requirements. The additional industrial and commercial land uses proposed under buildout for the proposed General Plan would likely result in an increase in routine transport, use, and disposal of hazardous materials. Such an increase in hazardous materials could result in a significant hazard to the public or the environment.

However, federal and state regulations as well as proposed General Plan Policy S-H-1, which requires the City to regulate the production, use, storage and transport of hazardous materials, will reduce the risks associated with the transport, use, and disposal of hazardous materials.

At a federal level, CERCLA, SARA, RCRA, FIFRA, and NESHRAP act to regulate production, use and disposal of hazardous materials by tracking materials, applying standards for cleanup and remediation, and by requiring certifications for handlers and adherence to guidelines tailored to specific hazardous materials. The State of California has developed CUPA, which is locally administered by the Healdsburg Fire Department. CUPA ensures registration of hazardous waste generators, permitting of storage tanks, compliance with the Uniform Fire Code, implementation of emergency response procedures, employee training for facilities handling hazardous materials, implementation of hazardous materials release response plan, and mitigation of potential accidental release.

Other state plans, programs, and permits designed to mitigate the risk associated with hazardous materials include the Injury and Illness Prevention Plan, Emergency Action Plan, Fire Prevention Plan, Hazard Communication Plan, required permits for septic systems, and air quality permits for stationary sources.

The state agency Cal/OES requires that specific businesses prepare an inventory of hazardous materials in order to implement proper emergency response plans while the state agency Cal/OSHA establishes California standards for workers dealing with hazardous materials. Caltrans and CHP enforce and monitor hazardous materials transportation within California. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roads. Additionally, the proposed General Plan will address potential impacts from hazardous materials through the implementation of Policies S-H-1 and S-H-2, which will regulate production, use, storage and transport of hazardous materials within the city by ensuring new developments provide for reasonable controls on such hazardous materials, and protect current and new development from existing hazardous waste.

Construction workers and the closest residents to the Saggio Hills project site could be exposed to dust from asbestos rock and soils during project construction. However, the City Council resolution certifying the Saggio Hills Project EIR and its Mitigation Monitoring and Reporting Program included Mitigation Measure 3-6.2, which requires the implementation of the recommendations contained in the "Asbestos Report Related to Construction in Serpentinite Soils," and the preparation and implementation of a dust control plan before the start of ground-disturbing activities and during construction for each phase of project development. Implementation of this mitigation measure will reduce safety hazards to construction workers and the general public from the potential release of and exposure to hazardous materials to a less-than-significant level by removing any known or previously undiscovered contaminated soil or other hazardous materials from the site in accordance with federal, state, and local standards.

With the implementation of these programs, plans, policies and permits, development under the proposed General Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; therefore, impacts would be ***less than significant***.

Impact IV.H-2: The proposed Project would not 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.

As discussed in Impact IV.H-1, buildout under the proposed General Plan could result in upset and accident conditions involving the release of hazardous materials into the environment. With additional industrial and commercial uses, transport of hazardous materials for delivery and disposal purposes will increase, which will in turn increase the risk of upset and accident conditions during transport. Additional industrial and commercial uses will also increase the amount of hazardous materials stored and used in such facilities within the city and will therefore increase the risk of onsite upset and accident conditions.

However, the implementation of federal and state regulations as well as proposed General Plan policies and implementation measures listed above will minimize associated risks and impacts. As discussed under Impact IV.H-1, there are federal, state, and local regulatory policies in place that will reduce the risk of accidental upset. Implementation Measure S-4 requires the City to maintain and periodically

update the City's Emergency Operations Plan, Recovery Manual and Hazard Mitigation Plan. Implementation Measure S-5 requires the City to conduct periodic emergency response exercises to test the effectiveness of City emergency response procedures. Policy S-F-1 requires the City to ensure that adequate emergency procedures are in place to respond to and recover from man-made and natural disasters. Therefore, impacts would be ***less than significant***.

Impact IV.H-3: The proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

As discussed in Impact IV.H-1, although the exact location and quantity of hazardous materials associated with an increase in industrial and commercial uses is not included in the proposed General Plan, an increase in these uses could result in additional transport, use and disposal of hazardous materials. The majority of the city's industrial and commercial land uses are clustered in the western side of the city along U.S. Highway 101. Industrial and commercial lands located within the city do exist within one-quarter mile of schools.

Due to the proximity of industrial and commercial lands to schools, it is possible that buildout of the proposed Project could result in hazardous emissions or the handling of hazardous materials within one-quarter mile from a school. However, implementation of federal and state regulations and policies drafted under the proposed General Plan will minimize potential impacts by protecting schools from hazardous materials and emissions. For example, federal regulations such as RCRA will ensure that hazardous waste is regulated from the time that the waste is generated until its final disposal, and NESHAP will protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. The Healdsburg Fire Department is responsible for CUPA authority in the city and will require all businesses handling hazardous materials to create a Hazardous Materials Business Plan which will reduce the risk of an accidental hazardous materials release. As discussed above, facilities that emit pollutants into the air from sources other than motor vehicles and consumer products are required to have a permit from the BAAQMD. Policy S-H-1 will also ensure that the City regulates the production, use, storage and transport of hazardous materials. Policy S-H-2 will protect new development (including new schools) from existing hazardous materials. Implementation Measure S-26 states that City approvals of all new development shall consider the potential for the production, use, storage, and transport of hazardous materials and provide for reasonable controls on such hazardous materials. As such, compliance with the regulations and policies above would minimize the risks associated with locating hazardous materials within one-quarter mile of schools. Therefore, impacts would be ***less than significant.***

Impact IV.H-4: The proposed Project would not create a significant impact to the public or the environment as a result of being located on a hazardous materials site compiled pursuant to Government Code Section 65962.5.

Development allowed by the proposed General Plan could be located on a currently unidentified hazardous materials site. However, cleanup and remediation will be required by federal regulations RCRA and CERCLA before construction begins. As such, impacts to the public or the environment resulting from a state response site located within the Healdsburg Planning Area would be ***less than significant***.

Impact IV.H-5: The proposed Project, although located within an airport land use plan [area], would not result in a safety hazard for people residing or working in the Project area.

Implementation of the proposed General Plan would not introduce development into the Healdsburg Municipal Airport's safety zones as defined in the Sonoma County Comprehensive Airport Land Use Plan. Within the Healdsburg Planning Area, only a few lots of the Vintage Hills subdivision west of the freeway are located within the Plan's referral area and its Traffic Pattern and Outer Safety Zones. All potential development is located outside of the referral area boundary and all airport zones.

Therefore, the proposed Project would not expose people residing and working in the Planning Area to a safety hazard regarding operation of a public airport and impacts would be ***less than significant***.

Impact IV.H-6: The proposed Project would not be located within the vicinity of a private airstrip, such that a safety hazard would result for people residing or working in the Project area.

The proposed Project is not located within the vicinity of a private airstrip. As such, ***no impact*** would occur.

Impact IV.H-7: The proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Implementation of the Proposed General Plan will result in increased traffic. In the event a natural disaster occurs, traffic could slow an evacuation effort within the city.

The City of Healdsburg Emergency Operations Plan, adopted in December 2007, specifies roles and responsibilities during an evacuation. A draft Emergency Operations Center operations manual has been prepared and is anticipated to be adopted in early 2009.[4]

Proposed General Plan policies will also minimize potential impacts on emergency operations. Policies described in IV.O (Transportation/Traffic), specifically Policies T-A-1, T-A-4 and T-A-12, will require that level of service (LOS) for roadway operation is maintained above the minimum LOS standard during

[4] *City of Healdsburg Fire Department, personal communication, January 5, 2009.*

peak traffic conditions, and ensure adequate access for emergency service vehicles. Policy S-F-1 will ensure that adequate emergency procedures are in place to respond to and recover from man-made and natural disasters. Therefore, impacts would be ***less than significant***.

Impact IV.H-8: The proposed Project would not 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.

Development under the proposed General Plan could occur in Development Sub-Areas A, B, C, E, and H, shown in Figure III-7 , which are located in a zone of high fire hazard shown in Figure IV.H-1. The high fire hazard zone is generally characterized by wooded hillsides and ridges, open space, and low density/intensity land uses. Development in this zone will impact fire equipment accessibility, and the interface between flammable wildland vegetation and residential structures. As a result, people and structures could be exposed to a risk of loss, injury or death involving wildland fires.

Although the risk of exposure to wildland fires could be increased as a result of buildout under the proposed General Plan, policies included in the proposed General Plan will minimize associated potential risks. For example, Policies S-D-1 through S-D-5 will ensure that areas of high fire hazard are designated for open space or low intensity uses; promote the active and continuous involvement of government, industry, and citizens in all aspects of fire prevention and control; improve the city's overall Insurance Services Office (ISO) rating; require development in fire hazard zones to reduce fire risk through proper design and materials; and minimize response times to fires. Therefore, the potential to increase the exposure of people or structures to wildland fires will be minimized by fire reduction measures and the impact would be ***less than significant***.

CUMULATIVE IMPACTS

The geographic context for cumulative impacts resulting from hazards and hazardous materials is the Planning Area. The above hazards and hazardous materials impact discussions account for the entire Planning Area and therefore also reflect cumulative impacts. As such, federal, state, and local regulations would result in cumulative impacts regarding hazards and hazardous materials that would be ***less than significant***.

MITIGATION MEASURES

With implementation of applicable regulations and the proposed General Plan policies and implementation measures listed above, no mitigation measures would be required for Impacts IV.H-1 through IV.H-8. Additionally, no mitigation measures would be required for cumulative impacts.