

## 5.8 HAZARDS & HAZARDOUS MATERIALS

---

### 5.8.1 INTRODUCTION

This section describes and evaluates the potential risks to human health and safety associated with the potential of the transportation, use, storage and disposal of hazardous materials related to the land uses within the East Gateway Project areas. It also evaluates potential incidents of upset (e.g., accidental spills) involving hazardous materials and their potential impact on area residents and businesses. This section identifies and discloses the status of the East Gateway Project area as an identified hazardous materials site (if applicable) on state or federal agency databases. In addition, an analysis of potential safety hazards associated with the Santa Paula Airport is also included, since this facility is located within two (2) miles of the East Gateway Project area.

### 5.8.2 EXISTING CONDITIONS

#### 5.8.2.1 Definitions

##### ***Hazardous Material***

A number of properties may cause a substance to be considered hazardous, including toxicity, ignitability, corrosivity, or reactivity. A hazardous material is defined as:

*... a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either: (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating irreversible illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed.<sup>1</sup>*

##### ***Hazardous Waste***

A “hazardous waste” is defined as “any hazardous material that is abandoned, discarded or recycled.”<sup>2</sup> In addition, hazardous wastes occasionally may be generated by actions that change the composition of previously nonhazardous materials. The same criteria that render a material hazardous make a waste hazardous: toxicity, ignitability, corrosivity, or reactivity.

---

1 22 CCR § 66084.

2 California Health and Safety Code, § 25124.

### 5.8.2.2 City of Santa Paula Hazardous Materials and Emergency Preparedness

The City of Santa Paula Fire Department (SPFD) oversees emergency operations within the City. The SPFD follows the Personnel Training and Emergency Response Plan outlined in the California Code of Regulations, Title 26, Division 19 and 19.1.<sup>3</sup> This includes such information as provisions for informing business personnel and the affected public of safety procedures to follow during a release or threatened release of a hazardous materials, and designation of responsibility for the coordinated release of safety information to the public and to the local Emergency Broadcast System, and the provisions for evacuation plans.

The American Red Cross is the lead agency involved in providing disaster relief during peacetime disasters.<sup>4</sup> The Red Cross acts cooperatively with State and local governments, including the California Office of Emergency Services and the California Department of Social Services, and private relief organizations to provide relief services.

Evacuation centers to be used in the event of disaster vary depending on the location and nature of the disaster. The facilities most likely to be used are the local high schools.<sup>5</sup> These facilities are ideal because they are public facilities and can accommodate lodging, feeding and showering. Other options include junior and elementary schools, churches, community centers, and even commercial lodging facilities.

The seriousness of a hazardous material incident is dependent on a number of factors including the type and quantity of material involved, the proximity to populated areas, the time of day, weather conditions and physical state of material (i.e., solid, liquid, vapor or gas). The greater the number of people exposed to the hazardous material, the greater the potential for significant impact. Because of their dispersion characteristics, vapors and gases tend to involve greater hazards. Under a worst case scenario, an incident could result in mass fatalities and injuries, destruction of private and public improvements, and contamination of the environment.

Although a hazardous materials release could occur anywhere within the City of Santa Paula, certain areas are at greater risk. These include the following:<sup>6</sup>

- SR 126 (which is directly to the north and south of the East Gateway Project) and SR 150 are major transportation corridors through the Santa Paula area. A hazardous material spill involving transportation would most likely occur along one of these highways.

---

3 Santa Paula General Plan Safety Element, p. S-17..

4 3 USC, Public Law 930288, Federal Disaster Relief Act of 1974.

5 Santa Paula General Plan Safety Element, p. S-17.

6 Ibid, pp. S-17 and S-20.

- Because of the high number of businesses that use or store hazardous materials on Main Street or Harvard Boulevard (both roadways are adjacent to the east boundary of the East Gateway Project), these major arterials and adjacent neighborhoods are probably at greater risk than other arterials within the City.
- One facility with acutely hazardous materials is located on Quail Court, and poses a higher risk than other facilities within the City. Quail Court is located to south of the East Gateway Project across SR 126 and to the east of the small triangle annexation piece used as storage area south of SR 126.

### **5.8.2.3 Existing and Surrounding Uses**

Existing land uses surrounding the East Gateway Project include residential, commercial, light industrial development, vacant land, and both fallow and active farmland. Parcels that comprised the East Gateway Project area north of SR 126 currently have residential and commercial uses; and south of SR 126, uses include agriculture, commercial and light industrial/manufacturing. Areas along the Santa Clara River are primarily open space. Existing sites that may potentially contain hazardous materials in the East Gateway Project area include a range of sites with a variety of potential sources of contamination, including various forms of chemical waste, oil and gas, auto-repair facilities, and fueling stations. In addition, because the East Gateway Project would result in the conversion of agricultural areas including the row crops, orchards, and fallow agricultural land, it is conceivable that organochlorine pesticides were used in these areas in the past. The majority of the building structures located within the East Gateway Project area were constructed between the early 1900s and late 1950s; structures constructed or remodeled between 1930 and 1981 have the potential to contain asbestos containing building materials (ACBM). These materials can include, but are not limited to, resilient floor coverings, drywall joint compounds, acoustic ceiling tiles, piping insulation, electrical insulation and fireproofing materials. Many of the buildings within the planning area were constructed prior to the ban on ACBM and, therefore, these materials may be present in the East Gateway Project area.

Exposure to lead from older vintage paint is possible when the paint is in poor condition or during its removal. In construction settings, workers can be exposed to airborne lead during renovation, maintenance, or removal work. Lead-based paints were phased out of production in the early 1970s. Many of the buildings within the East Gateway Project area were constructed prior to the ban on lead-based paints and, therefore, these materials may be present in the planning area

#### 5.8.2.4 Federal and State Database Review

A government database report, prepared by EDR (contained in **Appendix 5.8**), of available federal, state, and County agency databases was reviewed to identify government-regulated properties having known recognized environmental conditions and potential environmental concerns on or within the vicinity of the East Gateway Project area. Descriptions of the government databases reviewed are detailed in the EDR report. Also included in the EDR report are maps illustrating the location of listed properties relative to the East Gateway Project area. A number of the properties identified within 1.5 miles of the East Gateway Project area have been identified on multiple databases. This radius search was conducted from the point within the East Gateway Project area and not from the boundaries of the project site.

A summary of properties that could not be mapped by EDR (orphan sites) due to poor or inadequate address information is also included in the EDR reports. Based on a review of the orphan sites, 20 were identified through a review of the available addresses, which was located within a 1.5 mile radius of the East Gateway Project area. The pertinent findings of the government database review are summarized below:

- The federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) list contains data on potentially hazardous waste sites that have been reported to the US Environmental Protection Agency (EPA) by states, municipalities, private companies and private persons, pursuant to Section 103 of the CERCLA. CERCLIS contains sites that are either proposed to, or on, the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL. A review of the CERCLIS list indicated that there are three CERCLIS sites within approximately one mile of the East Gateway Project area.
- The federal CERCLIS No Further Remedial Action Planned (NFRAP) site contains archived sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list sites on the NPL. This does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site. A review of the CERCLIS-NFRAP list indicates that two sites are located within one mile of the East Gateway Project area.
- The federal Resource Conservation and Recovery Act (RCRA) generators list contains selective information on sites that generate, transport, store, treat and/or dispose of hazardous waste as defined by the RCRA. Large quantity generators (LQG) generate over 1,000 kilograms (kg) of

hazardous waste, or over 1 kg of acutely hazardous waste per month. The RCRA-LQG list identified two sites within 0.75 miles of the East Gateway Project area.

- Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month. The RCRA-SQG list identified 14 sites within 0.75 miles of the East Gateway Project area.
- Conditionally exempt small quantity generators (CESQG) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. The RCRA-CESQG list identified two sites within 0.75 miles of the East Gateway Project area.
- The State and tribal equivalent CERCLIS list identified two sites on the EnviroStar list within 1.5 miles of the East Gateway Project area.
- The Leaking Underground Storage Tank (LUST) Incident Reports list contains an inventory of reported leaking underground storage tank incidents. A review of the LUST list revealed that there are 31 LUST sites within 1 mile of the East Gateway Project area.
- The Spills, Leaks, Investigations and Cleanup (SLIC) programs list revealed that there are five sites within 1 mile of the East Gateway Project area.
- The Underground Storage Tank (UST) list identified 25 sites within 0.75 miles of the East Gateway Project area.
- The Hazardous Substance Storage Container Database (HIST UST) is a historical listing of UST sites. There are 20 HIST UST sites within 0.75 miles of the East Gateway Project area.
- Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), requires all registered pesticide-producing establishments to submit a report to the EPA by March 1<sup>st</sup> each year. One section seven tracing system (SSTS) site is located within 0.5 miles of the East Gateway Project area.
- The Ventura County Business Plan (B), Waste Producer (W), and/or Underground Tank (T) information list indicates that 22 BWT sites are located within approximately 0.5 miles of the East Gateway Project area.
- The Facility and Manifest Data (HAZNET) contains data extracted from copies of hazardous waste manifests received each year by the California Department of Toxic Substances Control (DTSC). According to a review of the HAZNET list, 57 sites are within approximately 0.5 miles of the East Gateway Project area.

- The Emissions Inventory Data (EMI) contains toxic and criteria pollutant emissions data collected by the California Air Resources Board (CARB) and local air pollution agencies. Approximately five EMI sites have been listed within 0.5 miles of the East Gateway Project area.
- The Registered Hazardous Waste Transporter Database (HWT) contains a listing of hazardous waste transporters. A review of the HWT list has revealed that there are four HWT sites within approximately 0.75 miles of the East Gateway Project area.
- The Medical Waste Management Program (MWMP) ensures the proper handling and disposal of medical waste by permitting and inspecting medical waste Offsite Treatment Facilities and Transfer Stations throughout the State. MWMP also oversees all Medical Waste Transporters. A review of the MWMP list revealed that one MWMP site is located within 0.75 miles of the East Gateway Project area.

### **5.8.2.5 Oil and Gas Resources**

Four active oil fields exist within the City of Santa Paula planning area: the Saticoy Field, the Santa Paula Field, the South Mountain Field, and the West Mountain Field. Union Oil has numerous active, inactive, and abandoned oil wells, as well as oil collecting and staging facilities, in the Santa Paula, South Mountain and West Mountain Field areas. The South Mountain and West Mountain Fields lie south of the Santa Clara River in the South Mountains. The Santa Paula Field lies in the Sulphur Mountain area, west of SR 150 and south of Ojai, in the northern portion of the planning area. Sage-California and/or Whiting Petroleum Corporation, has numerous active, inactive, and abandoned oil wells in the Saticoy Field. The Saticoy Field lies essentially south of SR 126, extending from approximately Todd Lane to the eastern boundary of the City of San Buenaventura. The location of the oil fields, the active, inactive and abandoned oil wells, and oil facilities are shown on the State of California Division of Oil, Gas and Geothermal Resources Map for South Mountain (Map No. 206).<sup>7</sup>

No production wells were identified on or within a quarter mile of the project site. The nearest plug and abandon oil dry hole is located about a half-mile east of the annexation parcel between SR 126 and Lemonwood Drive. This abandon well is the Nuevo Energy SPS-1. Several abandon and operating oil wells are located within a mile of the East Gateway Project area along the South Mountain area.<sup>8</sup>

---

<sup>7</sup> California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Onshore Oil & Gas Maps, South Mountain Field Map 206, 1-inch to 500 feet,

<sup>8</sup> California Division of Oil and Gas, South Mountain Field Map 206, May 13, 2002, accessed at <ftp://ftp.consrv.ca.gov/pub/oil/maps/dist2/206/Map206.pdf>, July 7, 2012.

The State Fire Marshal is responsible for pipeline safety in the City of Santa Paula.<sup>9</sup> The approximate locations of all crude oil and natural gas pipelines and oil and gas facilities that traverse the City of Santa Paula's planning area are shown on **Figure 5.8-1, City of Santa Paula Crude Oil and Natural Gas Pipelines.**

In the area of the East Gateway Project, the oil and gas pipeline generally follows along the railroad right of way and the natural gas pipeline follows along Telegraph Road. No known recorded leaks based on the EDR report have occurred in the East Gateway Project area from these pipelines.

### 5.8.2.6 Aircraft and Airport Hazards

The East Gateway Project area is located approximately 0.75-miles east and northeast of the Santa Paula Airport. The Santa Paula Airport (Airport) is in the south-central part of the City and is bounded by SR 126 on the north, Palm Avenue on the west, Ojai Street on the east and the Santa Clara River on the south. The Airport is a public use airport that is privately owned and operated by the Santa Paula Airport Association. The Airport encompasses a total of 38 acres and provides a single asphalt runway that is 2,650 feet long and 40 feet wide.<sup>10</sup> The runway is used by piston and propeller, single and twin-engine planes; no commercial aircraft use this Airport. The Airport operates under visual flight rule conditions only, indicating that approaches to the runway are only made in weather conditions where cloud cover is greater than 1,000 feet in height and visibility is greater than three miles.

The State of California has defined air safety zones in the Airport Land Use Planning Handbook.<sup>11</sup> Santa Paula Airport has adopted the State of California air safety zones that include the Inner Safety Zone, the Outer Safety Zone and the Traffic Pattern Zone. A fourth air safety zone, the Extended Runway Centerline Zone, was not applied by the Ventura County Airport Land Use Commission to Santa Paula Airport due to the lack of a relationship with historical aircraft accident data in Ventura County, and the lack of instrument approaches at the Airport.<sup>12</sup>

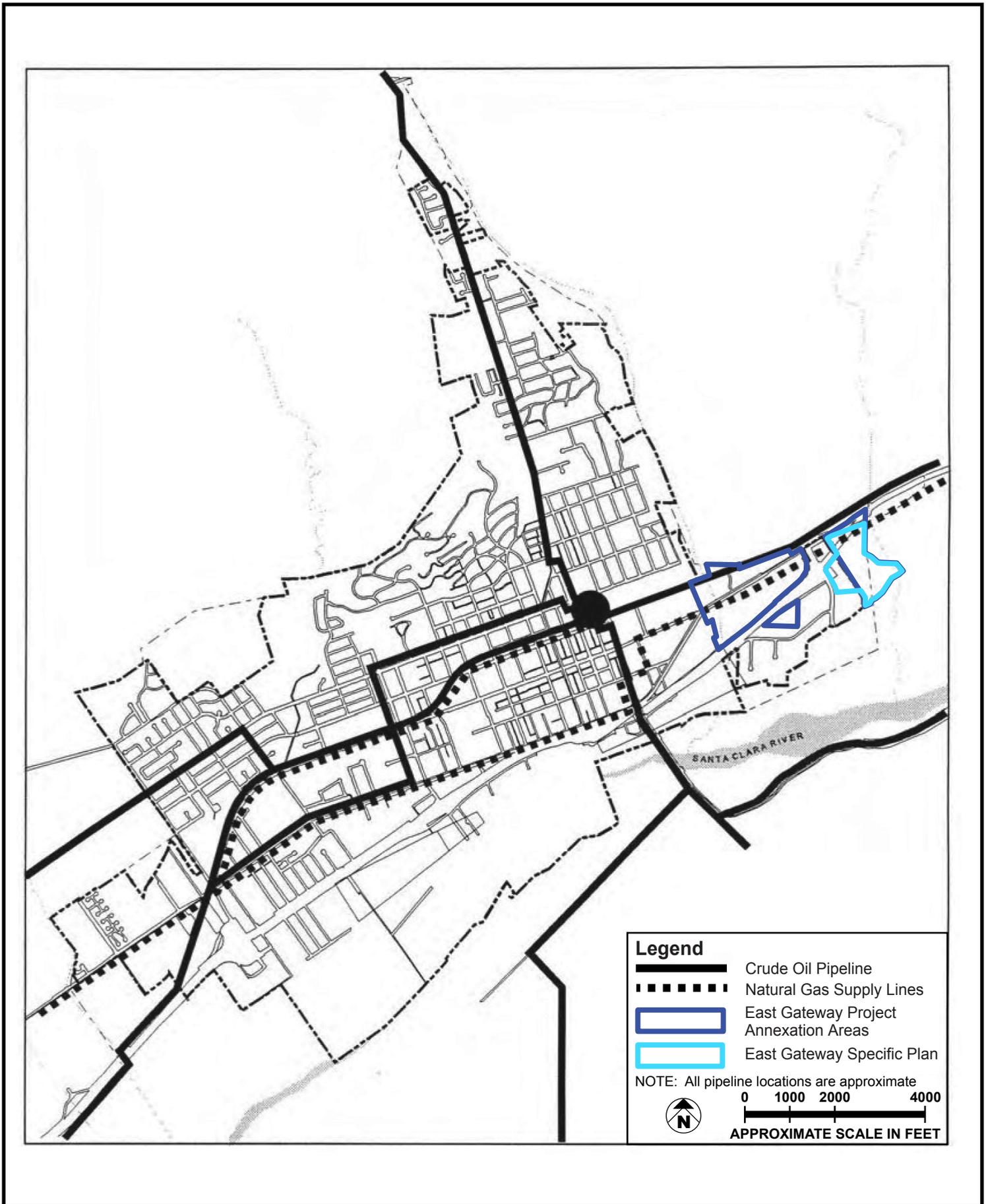
---

9 Santa Paula General Plan, Safety Element, p. S-24.

10 Ventura County Airport Land Use Commission, Airport Comprehensive Land Use Plan for Ventura County (Final Report), 2000, page 4-6.

11 State of California, Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011.

12 Ventura County Airport Land Use Commission, Airport Comprehensive Land Use Plan for Ventra County (Final Report), 2000. P. 4-6.



SOURCE: City of Santa Paula, Safety Element, 1998. Figure S-8

FIGURE 5.8-1

Portions of the proposed project, specifically the annexation area south of SR 126 and the majority of the East Gateway Specific Plan, are within the Santa Paula Airport Comprehensive Airport Land Use Plan (CLUP) Traffic Pattern Zone (TPZ).<sup>13</sup> The TPZ is identified as the area beneath the outer edge of the aircraft flight paths. Additionally, the portion of the annexation area south of SR 126 and the southwest corner of the East Gateway Specific Plan are located within the Height Restriction Zone as listed in the City's General Plan.

See **Section 5.13** for a more detailed discussion of aircraft and airport safety.

### 5.8.2.7 Emergency Evacuation Routes

Regional access to the project site is available via SR 126. Local street access to the project site is currently only available through the City of Santa Paula's circulation network via East Telegraph Road, Texas Lane, and Hallock Drive. Major emergency evacuation routes as identified in the City of Santa Paula's General Plan Safety Element include SR 126 as the east/west evacuation route and 12<sup>th</sup> Street, North Ojai Road (SR 150) and South Mountain Road as north/south evacuation routes.<sup>14</sup>

The City of Santa Paula Fire Department (SPFD) is ultimately responsible for coordinating evacuation necessitated by an emergency. If delayed during a large disaster, the SPFD Chief is responsible for coordinating evacuation efforts on an interim basis. **Figure 5.8-2, City of Santa Paula Emergency Evacuation Routes**, shows the routes and streets to be used in the event of a disaster requiring evacuation.

### 5.8.2.8 Wildland Fires

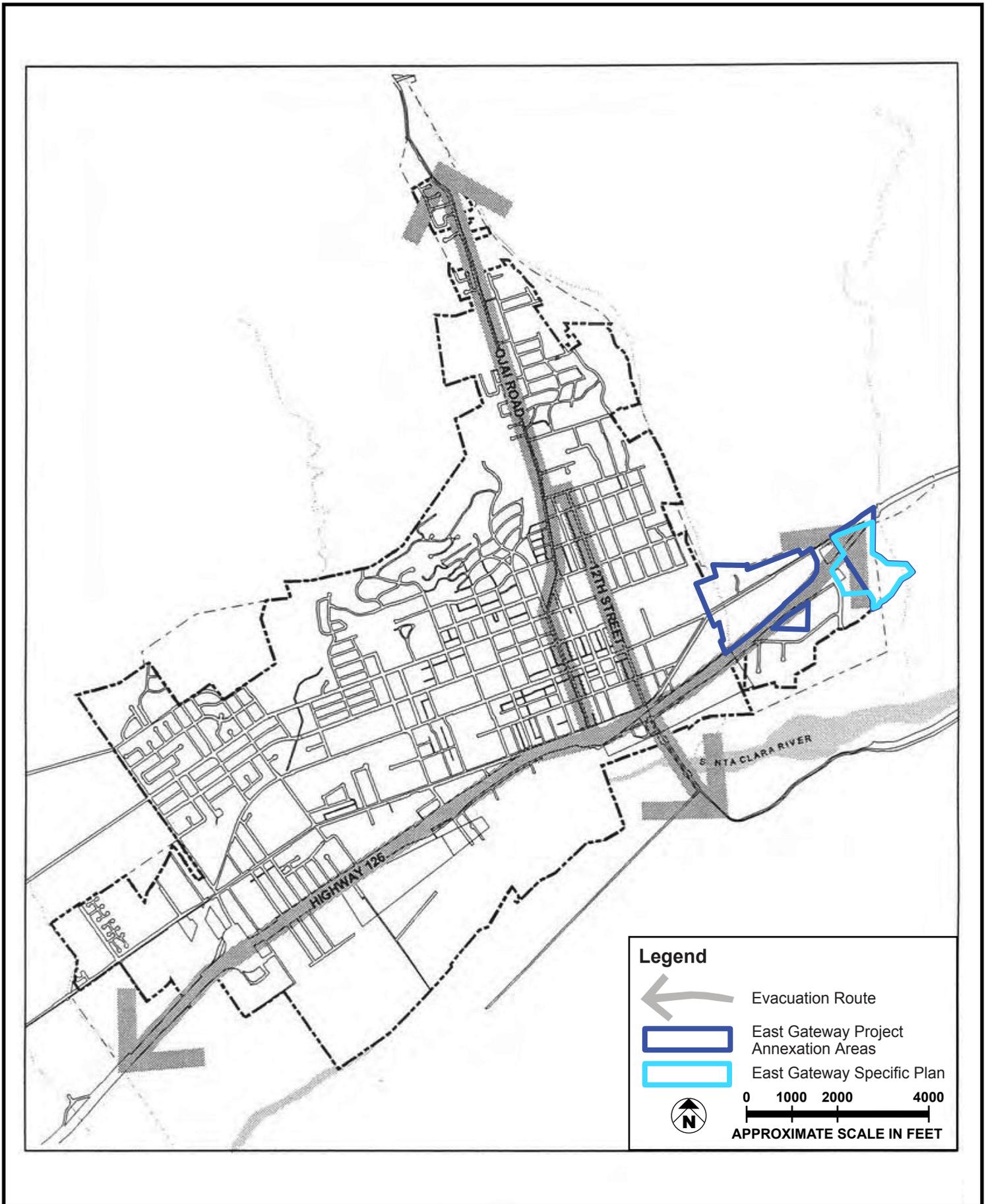
Wildland fires can occur in open spaces containing a mixture of flammable and nonflammable vegetation cover. Such fires can endanger human life and existing structures to the extent that they occur or originate in developed or partially developed areas. The California Department of Forestry and Fire Protection (CALFIRE) have published maps of Fire Threat. The CALFIRE has designated the East Gateway Project area as a local responsibility area and as an area that has been ranked as having little or no threat to having an extreme threat.<sup>15</sup>

---

13 Ventura County Airport Land Use Commission, Airport Comprehensive Land Use Plan for Ventra County (Final Report), 2000. P. 4-6..

14 Santa Paula General Plan, Safety Element, Figure S-6 Evacuation Routes.

15 California Department of Forestry and Fire Protection, Fire Threats, 2007 [http://frap.cdf.ca.gov/projects/wui/525\\_CA\\_wui\\_analysis.pdf](http://frap.cdf.ca.gov/projects/wui/525_CA_wui_analysis.pdf); accessed on July 8, 2012



SOURCE: City of Santa Paula, Safety Element, 1998. Figure S-6

FIGURE 5.8-2

Fire prevention and suppression services are provided by the SPFD.<sup>16</sup> The SPFD is responsible for enforcing the following:

- All aspects of the 2010 California Fire Code (or the most current edition of the California Fire Code as adopted);
- Any City of Santa Paula ordinances and/or amendments pertaining to fire prevention and suppression;
- California Health and Safety Code, Division 12, Part 2.7 (Fire District Law) and Part 5 (Abatement of Hazardous Weeds and Rubbish); and
- California Health and Safety Code, Sections 25501 through 25510 as they pertain to the administration of Hazardous Materials Business Plans.

The SPFD should be consulted prior to new development, particularly in hillside areas where access is critical to retarding and/or eliminating a wildland brush fire.

The Santa Paula area, predominantly the areas along SR 150, is located along the urban/wildland interface. **Figure 5.8-3, City of Santa Paula Fire Hazard Zones**, presents the fire hazard areas. The level of hazard is based largely on the type of ground cover, the slope of the ground, and the ability of fire crews and engines to access the area.

Similarly, the City of Santa Paula General Plan Safety Element designates the East Gateway Project area as a low-range fire hazard area.<sup>17</sup>

### **5.8.2.9 Other Public Safety Hazards**

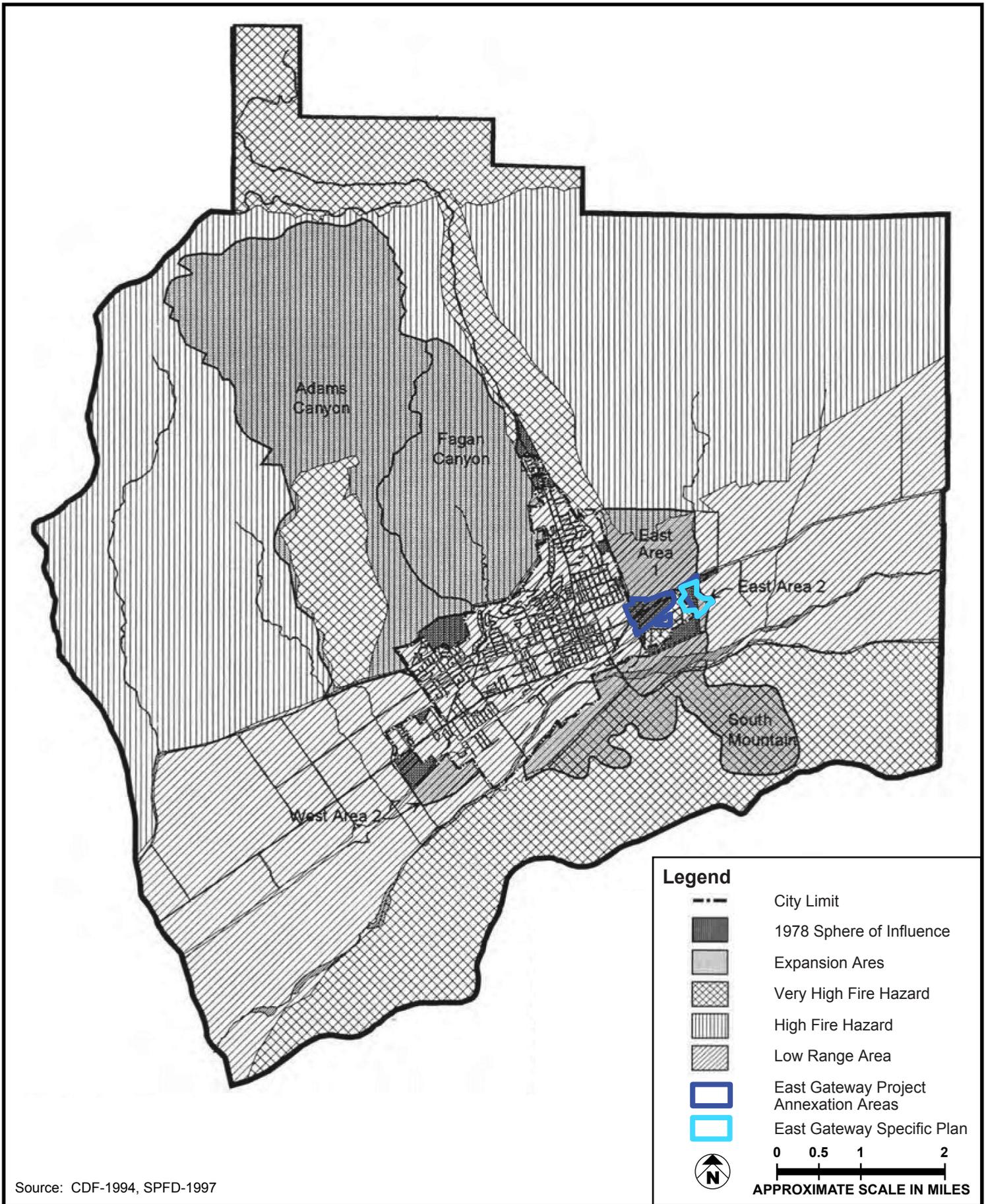
The California Department of Health Services participated in the United States Environmental Protection Agency's (EPA) State Radon Survey in 1990. Out of the 2,858 homes surveyed, the results for 1,885 homes were utilized for the survey. The EPA recommended action level for radon is 4 picocuries per liter of air (pCi/L). For Ventura County, referred to as Region 8 in the EPA survey, the results indicated that the arithmetic mean for homes surveyed was 1.3 pCi/L, the median was 0.9 pCi/L, and the 90th percentile was 2.8 pCi/L. The results also indicated that 5.2 percent of the homes surveyed in Region 8 had radon levels exceeding 4 pCi/L.

Radon mapping performed indicates that in general, Santa Paula is within an area noted as having low potential for indoor radon exposure (less than 4 pCi/L per liter). However, the mountainous areas both

---

<sup>16</sup> Santa Paula General Plan, Safety Element, p. S-15.

<sup>17</sup> Santa Paula General Plan Update Final EIR, February 1998.



Source: CDF-1994, SPFD-1997

SOURCE: City of Santa Paula, Safety Element, 1998. Figure S-5

FIGURE 5.8-3

north and south of the City exhibit a high radon exposure potential.<sup>18</sup> According to the survey and the EPA, “no survey will be able to predict what the radon exposure level measurement in an individual house might be. This is because radon concentration, in homes and buildings, has been found to depend on many factors, including which floor of the building the measurement was taken, the specific types of construction and building materials used in the design and construction of the building, and whether windows and doors in the building were opened or closed during the testing period. For these reasons, the only way to determine the amount of radon present in a particular home or building is to test that home or building for radon using a radon detector.”

### **5.8.3 APPLICABLE REGULATIONS**

#### **5.8.3.1 Federal**

##### ***Comprehensive Environmental Response, Compensation, and Liability Act***

Discovery of environmental health damage from disposal sites prompted the U.S. Congress to pass the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund). The purpose of CERCLA is to identify and clean up chemically contaminated sites that pose a significant environmental health threat. The Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List for cleanup activities.

##### ***Hazardous Materials Transportation Act***

The Hazardous Materials Transportation Act<sup>19</sup> is the statutory basis for the extensive body of regulations aimed at ensuring the safe transport of hazardous materials on water, rail, highways, through air, or in pipelines. It includes provisions for material classification, packaging, marking, labeling, placarding, and shipping documentation.

##### ***Resource Conservation and Recovery Act***

The Resource Conservation and Recovery Act (RCRA),<sup>20</sup> Subtitle C addresses hazardous waste generation, handling, transportation, storage, treatment, and disposal. It includes requirements for a system that uses hazardous waste manifests to track the movement of waste from its site of generation to its ultimate disposition. The 1984 amendments to RCRA created a national priority for waste minimization. Subtitle D establishes national minimum requirements for solid waste disposal sites and practices. It requires states to develop plans for the management of wastes within their jurisdictions. Subtitle I requires

---

18 Santa Paula General Plan Safety Element, p. S-28.

19 49 USC §§ 5101 et seq., Hazardous Materials Transportation Act.

20 Resource Conservation and Recovery Act of 1976. Subtitle C Hazardous Waste Management. § 3001.

monitoring and containment systems for underground storage tanks that hold hazardous materials. Owners of tanks must demonstrate financial assurance for the cleanup of a potential leaking tank.

The role of the California Department of Toxic Substances Control (DTSC), a Division of the California Environmental Protection Agency (CalEPA), is to protect California and Californians from exposures to hazardous wastes by regulating hazardous waste, cleaning up existing contamination, and looking for ways to reduce the hazardous waste produced in California. The DTSC regulates hazardous waste in California primarily under the authority of the federal Resource Conservation and Recovery Act (RCRA) of 1976, and the California Health and Safety Code. Other laws that affect hazardous waste include regulations on handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. In addition, DTSC reviews and monitors legislation to ensure that the legislation reflects the DTSC's goals. From these laws, DTSC's major program areas develop regulations and consistent program policies and procedures. The regulations spell out what those who handle hazardous waste must do to comply with the laws. Under RCRA, DTSC has the authority to implement permitting, inspection, compliance, and corrective action programs to ensure that people who manage hazardous waste follow state and federal requirements. As such, the management of hazardous waste in the City of Santa Paula would fall under the regulation of the DTSC, ensuring that state and federal requirements are complied with pertaining to hazardous waste.

### ***Federal Hazardous Materials Regulations***

The Hazardous Materials Regulations (HMR)<sup>21</sup> are issued by the Pipeline and Hazardous Materials Safety Administration and govern the transportation of hazardous materials by highway, rail, vessel, and air. The HMR address hazardous materials classification, packaging, hazard communication, emergency response information and training.

The transport of hazardous material is covered by Title 49 of the federal code.<sup>22</sup>

#### **5.8.3.2 State**

### ***The California Hazardous Waste Control Law***

The Hazardous Waste Control Law (HWCL)<sup>23</sup> is the primary hazardous waste statute in the State of California. The HWCL implements RCRA as a "cradle-to-grave" waste management system in the State

---

21 U.S. Department of Transportation, Pipeline and Hazardous Material Safety Administration, <http://www.phmsa.dot.gov/hazmat/regs/>.

22 49 USC, Transportation, Subtitle B, Parts 100-177, Pipeline and Hazardous Materials Safety Administration, Department of Transportation

23 CCR, §§ 25100. - 25257.1.

of California. HWCL specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure their proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reused as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning, and a much broader requirement for permitting facilities that treat hazardous waste. It also regulates a number of types of wastes and waste management activities that are not covered by federal law with RCRA.

### ***California Code of Regulations – Title 22***

Most state and federal regulations and requirements that apply to hazardous waste are spelled out in the California Code of Regulations (CCR).<sup>24</sup> Title 22 contains the detailed compliance requirements for hazardous waste generators, transporters, and treatment, storage, and disposal facilities. California is a fully authorized state according to RCRA; therefore, most RCRA regulations<sup>25</sup> have been duplicated and integrated into Title 22. However, because the California Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the U.S. EPA, the integration of California and federal hazardous waste regulations that make up Title 22 do not contain as many exemptions or exclusions as does 40 CFR 260. As with the California Health and Safety Code, Title 22 also regulates a wider range of waste types and waste management activities than does the RCRA regulations in 40 CFR 260. To aid the regulated community, California compiled hazardous materials, waste and toxics-related regulations contained in CCR Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27 into one consolidated CCR Title 26, 'Toxics.' However, the California Hazardous waste regulations are still commonly referred to as Title 22.

### ***Transportation of Hazardous Materials***

The transport of hazardous materials and explosives through the City of Santa Paula is regulated by the California Department of Transportation (Caltrans). The Caltrans Hazardous Waste Management program assists districts statewide with the management of contaminants and wastes encountered on highway projects and Caltrans properties.<sup>26</sup> Technical experts assist or supplement district staff directing assessment, investigation or cleanup activities and develop guidelines for the management of these activities.

---

24 22 CCR Division 4.5. <http://www.dot.ca.gov/hq/env/haz/index.htm>

25 40 CFR §§ 260 et seq.

26 California Department of Transportation, Caltrans Hazardous Materials Program,

### 5.8.3.3 Local

#### *Ventura County*

##### **2010 Ventura County Hazard Mitigation Plan**

The 2010 Ventura County Hazard Mitigation Plan (Plan)<sup>27</sup> was prepared to meet the Department of Homeland Security's Federal Emergency Management Agency (FEMA) requirements of the Disaster Mitigation Act of 2000 (Public Law 106-390, DMA 2000) and Interim Final Rule (the Rule). The Rule establishes the minimum hazard mitigation planning requirements for states, tribes, and local entities. The City of Santa Paula is a participating member of the Plan.

The Plan is intended to serve many purposes, including the following:

- Enhance Public Awareness and Understanding – to help residents of the county better understand the natural and human-made hazards that threaten public health, safety, and welfare; economic vitality; and the operational capability of important institutions.
- Create a Decision Tool for Management – to provide information that managers and leaders of local government, business and industry, community associations, and other key institutions and organizations need to take action to address vulnerabilities to future disasters.
- Promote Compliance with State and Federal Program Requirements – to ensure that Ventura County and its incorporated cities comply with laws and regulations that encourage or mandate local governments to develop comprehensive mitigation plans.
- Enhance Local Policies for Hazard Mitigation Capability – to provide the policy basis for mitigation actions that should be promulgated by participating jurisdictions and districts to create a more disaster-resistant future.
- Provide Inter-Jurisdictional Coordination of Mitigation-Related Programming – to ensure that proposals for mitigation initiatives are reviewed and coordinated among the participating jurisdictions within the county.
- Achieve Regulatory Compliance – to qualify for the Pre-Disaster Mitigation (PDM) program, local jurisdictions must have an approved mitigation plan to receive a project grant. Local jurisdictions must have approved plans by November 1, 2004, to be eligible for HMGP funding for presidentially declared disasters after this date. Plans approved at any time after November 1, 2004, will make communities eligible to receive PDM and HMGP project grants.

The Plan addresses four major hazard profiles which are earthquakes, flooding, geologic hazards and wildfires.

---

27 Ventura County, 2010 Ventura County Hazard Mitigation Plan, adopted December 2010.

### **Hazardous Materials Business Plan and Emergency Response/Contingency Plan**

A business or government facility that stores hazardous materials is required to complete and submit a Hazardous Material Business Plan and Emergency Response/Contingency Plan to the Ventura County Environmental Health Department.<sup>28</sup> The purpose of the plan is to provide information on the location, type and health risks of hazardous materials for emergency response planning and the public. A plan is required if a facility has hazardous materials in quantities equal to or greater than 55 gallons, 500 pounds, 200 cubic feet of compressed gas or hazardous waste in any quantity.

### ***City of Santa Paula***

#### **General Plan Safety Element**

The City of Santa Paula has prepared this revised Safety Element of the General Plan in compliance with California State law.<sup>29</sup> The updated Safety Element should assist the City in planning for hazards and responding to disasters by serving the following functions:

- Providing a framework by which safety considerations are introduced into the land use planning process;
- Recommending revisions in the development review process, by facilitating the identification and mitigation of hazards;
- Providing policies directed at identifying and reducing hazards; and
- Strengthening earthquake, inundation, fire, flood, and hazardous materials preparedness specific to Santa Paula.

The following section of this element supports the goals, objectives, and policies by providing specific programs and standards to carry out the Safety Element:<sup>30</sup>

#### *Fire Protection*

##### Goals

Goal 4.1                      Development should mitigate undue risks from fires.

Goal 4.2                      Existing risks from fires should be reduced.

---

28 Ventura County, Department of Environmental Health, Fact Sheet, <http://www.ventura.org/rma/envhealth/cupa/documents/NewFacilityPacket.pdf>

29 Santa Paula General Plan, Safety Element.

30 Ibid, p. S-31 to S-38.

Goal 4.3 Development should incorporate designs, systems and practices for fire safety, prevention and suppression.

Objectives

- Objective 4(a) The Fire Department should be staffed with best available equipment, firefighters, supervisors, civilian personnel and administrators.
- Objective 4(b) Emergency Dispatch should be adequately staffed and equipped to handle the call load and monitor all police and fire operations.
- Objective 4(c) A program to require the installation of fire sprinklers in new and existing structures should be considered.
- Objective 4(d) An equitable cost recovery program should be designed and implemented to reimburse the City for emergency response and investigation.
- Objective 4(e) A fire safety and equipment access standard should be appropriately designed and implemented.
- Objective 4(f) A fire safety plan should be required of all businesses and multi-family occupancies.
- Objective 4(g) A program for fire safety plans and training should be designed and implemented.
- Objective 4(h) New development in the urban/wildland interface and other high fire risk areas should have enforceable plans or standards for fire resistive construction and landscaping and landscape maintenance.
- Objective 4(i) New development in urban/wildland interface areas should have supplemental stored, dedicated firefighting water supplies and outside fire sprinkler systems.
- Objective 4(j) Adequate water availability should be provided in all new development.

Policies

- Policy 4.a.a. Develop new and/or maintain existing policies, and upgrade these policies, standards, and restrictions which reduce the risk of urban and wildland fires to a reasonable level, including: design, reservation, and requirements regarding evacuation routes; peakload water supply requirements and performance standards for urban, suburban, and rural development; minimum road widths; clearances around structures; fire equipment response time; land use intensity/density standards; subdivision design for fire safety; and fire-safe building materials.
- Policy 4.b.b. Require that all fire safety standards conform with those established by the State Board of Forestry for state responsibility areas (State of California, Public Resources Code Section 4290) including: road standards for fire equipment access; standards for signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; fuel breaks and greenbelts; land use policies and safety standards that take into account the recurrent nature of wildland fires; design standards establishing minimum road widths and clearances around structures; and emergency preparedness protocol and procedures.
- Policy 4.c.c. The City should consider a future fire station location(s) closer to the urban/wildland interface currently existing along State Route 150, or in canyon areas proposed to be developed, and outside of the 100-year flood zone, dam inundation, and seismically-induced liquefaction hazard areas.
- Policy 4.d.d. The City should continue to enforce the 1994 Uniform Fire Code; the City of Santa Paula ordinances pertaining to fire prevention and suppression; the California Health and Safety Code Division 12, parts 2.7 and 5; and the California Health and Safety Code Sections 25501 through 25510. (IM 37)

*Hazardous Materials*

Goals

- Goal 5.1 Hazards to natural resources should be controlled or eliminated, including, but not limited to, pollution.
- Goal 5.2 Public environmental awareness, sound environmental practices and a healthy environment should be promoted.

Objectives

- Objective 5(a) Aquifer recharge areas should be protected and enhanced.
- Objective 5(b) The improvement and protection of air quality should be encouraged and supported.
- Objective 5(c) The improvement of water quality for drinking, cleaning, and other uses, should be encouraged and supported.
- Objective 5(d) Environmental decisions, mitigations and practices should be based on documented information about the local and specific environment.
- Objective 5(e) Public education about local problems and concerns should be incorporated into the environmental review process.

Policies

- Policy 5.a.a. The City should maintain and upgrade policies concerning the use, storage, and transportation of hazardous materials within the City planning area.
- Policy 5.b.b. City policies concerning the use, storage and transportation of hazardous materials, and regarding underground or above ground storage tanks, should reflect the County of Ventura Environmental Health Division and the State Regional Water Quality Control Board policies and requirements.

#### 5.8.4 THRESHOLDS OF SIGNIFICANCE

In order to assist in determining whether a project would have a significant effect on the environment, the *California Environmental Quality Act (CEQA)* identify criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the *State CEQA Guidelines* (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact on agricultural resources if it would:

- 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?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- 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?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- 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?

#### 5.8.5 PROJECT IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant with mitigation incorporated, or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP that made a reasonable argument that the issue was potentially significant (see Responses to NOP, **Appendix 1.0**).

### 5.8.5.1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

#### *Impacts*

Whereas incidents related to hazardous materials spills are not frequent, accidents along major transportation corridors can occur. Hazardous materials are transported along SR 126 via trucks that commonly carry a variety of hazardous materials. During the construction and operation of the East Gateway Project, there would deliveries and disposal of hazardous materials such as fuels, oils, solvents, and other materials. Existing federal and state laws adequately address risks associated with the transport of hazardous materials. These include regulations outlined in the Hazardous Materials Transportation Act, administered by the U.S. Department of Transportation. The California Department of Transportation is mandated to implement the regulations established by the U.S. Department of Transportation, which are published as the Code of Federal Regulations, Title 49.<sup>31</sup> With regard to the transportation of hazardous materials and wastes, these regulations govern the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous material transport.

The City of Santa Paula as a participating member with Ventura County Sheriff's Office of Emergency Services (OES) has devised and maintains a Hazard Mitigation Plan <sup>32</sup> that addresses the City's planned response to extraordinary emergency situations including incidents involving major hazardous material upset during transport. The plan provides operational concepts and identifies sources of outside support that would be provided through mutual aid agreements, state and federal agencies, and the private sector. Any transport of hazardous materials to the East Gateway Project area would be subject to the federal and state regulations described above. Potential impacts are considered to be less than significant through the implementation of standard state and federal requirements.

New commercial-retail, business park, light industrial, manufacturing, and shopping center uses that could be proposed as part of the East Gateway Project might store and use hazardous materials such as fuels, oils, solvents, and other materials. The magnitude for hazards for individual projects within the East Gateway area would depend upon the location, type, and size of development and the specific hazards associated with the individual sites. A variety of state and federal laws govern the generation, treatment, and/or disposal of hazardous wastes. Santa Paula's Fire Department and Ventura County Environmental Health Division have the authority to inspect on-site uses and to enforce state and federal laws governing

---

31 49 CFR, Transportation, Subtitle B, Parts 100-177, Pipeline and Hazardous Materials Safety Administration, Department of Transportation

32 Ventura County, 2010 Ventura County Hazard Mitigation,, adopted December 20102.

the storage, use, transport, and disposal of hazardous materials and wastes. In addition, City and County requires an annual inventory of hazardous materials in use on site, as well as the submission of a business emergency plan for annual review, as required by Emergency Planning and Right-to-Know Act (SARA Title III) and Chapter 6.95 of the California Health and Safety Code. These requirements would be mandated according to state and federal law.

Consequently, potential impacts are considered to be less than significant through the implementation of standard state and federal requirements.

### ***Mitigation Measures***

No mitigation is required.

### ***Residual Impacts***

Impacts would be less than significant.

#### **5.8.5.2 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?**

### ***Impacts***

#### **Asbestos-Containing Building Materials**

Structures constructed or remodeled between 1930 and 1981 have the potential of asbestos-containing building material (ACBM). These materials can include, but are not limited to, acoustical ceiling texture, resilient floor coverings, drywall joint compounds, acoustic ceiling tiles, roofing materials, piping insulation, electrical insulation, and fireproofing materials. Many of the buildings in the East Gateway Project area were developed prior to the ban on ACBM; therefore, the likelihood that some buildings in the project area contain these materials is high. Potential impacts during the development activities associated with the East Gateway could expose the public or environment to asbestos-containing building materials. Impacts are considered to be potentially significant without implementation of mitigation. No specific development projects are proposed at this time or analyzed in this EIR. Project-level review will be required for individual projects proposed within the East Gateway Project area.

#### **Lead Based Material**

There are a number of structures in the East Gateway Project area that were constructed prior to the ban on lead containing paints in 1979. Exposure to lead from older vintage paint is possible when the paint is

in poor condition or during its removal. Lead can enter the body by inhaling dust, fumes, or sprays containing lead or by the ingestion of food or other substances that contain lead. Lead poisoning can result in neurological damage, developmental impairment, and other health problems. The exposure to small amounts of lead, such as in a construction setting, would not likely have this effect. Nonetheless, potential health and safety impacts associated with development activities associated with the East Gateway Project area could affect anyone in the area (including workers and neighbors) who may be exposed to lead paint. The possibility of impacts to the public or environment from lead materials is considered to be potentially significant, without incorporation of mitigation. No specific development projects are proposed at this time or analyzed in this EIR. Project-level review will be required for individual projects proposed within the East Gateway Project area.

### **Soil and Groundwater Contamination**

The East Gateway Project area has a history of being used for agricultural purposes. In fact, the East Gateway Project would result in the conversion of agricultural areas including the row crops, orchards, and fallow agricultural land. It is conceivable that organochlorine pesticides were used in these areas in the past. Organochlorine pesticides are persistent, bio-accumulative pesticides and include DDD, DDE, and DDT. These types of pesticide are now banned in the United States but remain as residuals in soils. Soil testing done on the East Area No. 1 Specific Plan to north of the East Gateway Project area did identify chlordane, DDD, DDE, and DDT in samples. These samples were at levels that were not anticipated to result in environmental impacts. While it is likely that residual pesticide levels on the East Gateway Project area would also be below levels of concern, the potential does exist for individual parcels to be contaminated with past agricultural uses. Consequently, potential impacts are considered to be significant.

A government database report, prepared by EDR (contained in **Appendix 5.8**) of available federal, state, and County agency databases was reviewed to identify government-regulated properties having known recognized environmental conditions and potential environmental concerns on or within the vicinity of the East Gateway Project area. Existing sites that may potentially contain hazardous materials in the East Gateway Project area include a range of sites with a variety of potential sources of contamination, including various forms of chemical waste, oil and gas, auto-repair facilities, and fueling stations. However, any new development occurring on any of these documented hazardous materials sites would have to be preceded by remediation and cleanup under the supervision of the State Department of Toxic Substance Control (DTSC), or other regulatory agency (as deemed appropriate), before construction activities could begin, if such actions have not already occurred. In order to address the potential for encountering contamination within the East Gateway Project area, mitigation measures are proposed that would minimize the potential risk of contamination by implementing investigation and remediation efforts

at future development sites. Consequently, the potential impacts associated with unknown contamination would be reduced to less than significant.

Aside from the potential release of hazardous materials from potential demolition or refurbishment of existing structures within the East Gateway Project area, grading and excavation of sites for future development may also expose construction workers and the public to potentially unknown hazardous substances present in the soil or groundwater. If any unidentified sources of contamination are encountered during grading or excavation, the removal activities required could pose health and safety risks such as the exposure of workers, materials handling personnel, and the public to hazardous materials or vapors. Such contamination could cause various short-term or long-term adverse health effects in persons exposed to the hazardous substances. In addition, exposure to contaminants could occur if the contaminants migrated from the contaminated zone to surrounding areas either before or after the surrounding areas were developed, or if contaminated zones were disturbed by future development at the contaminated location. If exposed to hazardous substances, this would result in a significant hazard to the public.

### ***Mitigation Measures***

The following measures have been identified to mitigate the identified impacts:

- 5.8-1** Before issuance of a grading permit for projects within the reorganization (annexation areas), all buildings to be demolished or refurbished as part of individual project must be surveyed and sampled for asbestos-containing building materials by a licensed asbestos abatement contractor. If asbestos-containing building materials are determined to be present in the structures to be demolished, all asbestos-containing materials must be removed under acceptable engineering methods and work practices by the licensed asbestos abatement contractor prior to demolition. These practices include, but are not limited to, containment of the area by plastic, negative air filtration, wet removal techniques and personal respiratory protection and decontamination. The process must be designed and monitored by a California Certified Asbestos Consultant. The abatement and monitoring plan must be developed and submitted for review and approval by the appropriate regulatory agencies (currently the City of Santa Paula Building Official and Ventura County Air Pollution Control District) and must include all on-site structures with ACBMs.
- 5.8-2** Before issuance of a grading permit for projects within the reorganization (annexation areas), and demolition and/or refurbishment of buildings as part of individual projects, all

loose and peeling paint must be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with local, state, and federal regulations.

**5.8-3**

Before issuance of a grading permit for projects within the reorganization (annexation areas) and the East Gateway Specific Plan area on any individual project site that contains or are known to have historically contained commercial/industrial related uses, the site developer(s) must:

- Investigate the project site to determine whether it or immediately adjacent areas have a record of hazardous material contamination via the preparation of a preliminary environmental site assessment (ESA), which must be submitted to the City of Santa Paula for review. If contamination is found the report must characterize the site according to the nature and extent of contamination that is present before development activities precede at that site.
- If contamination is determined to be on site, the City of Santa Paula, in accordance with appropriate agency requirements, must require remediation of the soil and/groundwater conditions on the contaminated site. If further remediation is required, it must be the responsibility of the site developer(s) to complete such remediation prior to construction of the project.
- If remediation is required as identified by the local oversight agency, it must be accomplished in a manner that reduces risk to below applicable standards and must be completed prior to issuance of any occupancy permits. Soil remediation methods that could be employed include, but are not limited to, one or more of the following: excavation and on-site treatment, such as above ground bioremediation, soil washing, soil stabilization, soil vapor extraction, or high-temperature soil thermal desorption. Groundwater remediation methods that could be employed include, but are not limited to, pumping water to surface, treating, and returning to aquifer; treating groundwater in place by injecting oxidizing agents; and placing membrane in aquifer and using natural flows to trap contaminants.
- Closure reports or other reports acceptable to the City of Santa Paula Fire Department that document the successful completion of required remediation activities, if any, for contaminated soils, must be submitted and approved by the City of Santa Paula Fire Department prior to the issuance of grading permits for site

development. No construction must occur in the affected area until reports have been accepted by the City of Santa Paula.

- 5.8-4.** In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction within the reorganization (annexation areas) and the East Gateway Specific Plan area, construction activities in the immediate vicinity of the contamination must cease immediately. If contamination is encountered, a Risk Management Plan must be prepared and implemented that (1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development and (2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures must include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Example soil remediation methods that may be employed include, but are not limited to, one or more of the following: excavation and on-site treatment, such as above ground bioremediation, soil washing, soil stabilization, soil vapor extraction, or high-temperature soil thermal desorption. Example groundwater remediation methods that may be employed include, but are not limited to, pumping water to surface, treating, and returning to aquifer; treating groundwater in place by injecting oxidizing agents; and placing membrane in aquifer and using natural flows to trap contaminants. Depending on the nature of contamination, if any, appropriate agencies must be notified (e.g., City of Santa Paula Fire Department and Ventura County Environmental Health Division). If needed, a Site Health and Safety Plan that meets Occupational Safety and Health Administration requirements must be prepared and in place prior to commencement of work in any contaminated area.

### ***Residual Impacts***

Impacts would be less than significant.

**5.8.5.3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

***Impacts***

The East Gateway Project area is not within a quarter-mile of an existing school. The nearest school is Grace Thille Elementary School, which is located approximately .4 miles to the west of the East Gateway Project's boundary near Telegraph Road and Main Street. Consequently, impacts would be less than significant. In addition, please refer to **Sections 5.8.5.1** and **5.8.5.2** for a discussion of the transport of hazardous materials and upset and accident conditions involving the release of hazardous materials into the environment. Impacts are considered to be less than significant.

***Mitigation Measures***

No mitigation is required.

***Residual Impacts***

Impacts would be less than significant.

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

***Impacts***

A listing of hazardous materials sites compiled pursuant to Government Code § 65962.5 was reviewed. These include the list of Hazardous Waste and Substance Sites from the Department of Toxic Substances EnviroStor database; list of Leaking Underground Storage Tank (LUST) Sites by County and Fiscal Year from the Water Board Geotractor database; list of Solid Waste Disposal Sites identified by the Water Board with waste constituents above hazardous waste levels outside of the waste management unit; and list of "active" Cease and Desist Orders and Cleanup and Abatement Orders. Only three sites were identified in the East Gateway Project site and were included on the LUST listing. These included two sites at JE Clark Corporation at 18115 Telegraph Road and one site at Strangeland Trucking at 18145 Telegraph Road. One LUST site at the JE Corporation and the LUST site at Strangeland Trucking have received a case closure and thus remediation has already been completed. The remaining LUST site at JE Clark Corporation is undergoing existing remediation and included the installation of three monitoring wells. No sites were identified within the East Gateway Project site on the other lists.

Impacts would be less than significant.

**Mitigation Measures**

No mitigation measures are required.

**Residual Impacts**

Impacts would be less than significant.

**5.8.5.5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

**Impacts**

Safety hazards associated with the Santa Paula Airport are discussed in **Section 5.13 Transportation/Traffic** and are summarized below.

As indicated previously, portions of the proposed project, specifically the annexation area south of SR 126 and the majority of the East Gateway Specific Plan, are within the Santa Paula Airport CLUP Traffic Pattern Zone (TPZ). The TPZ is identified as the area beneath the outer edge of the aircraft flight paths. Additionally, the portion of the annexation area south of SR 126 and the southwest corner of the East Gateway Specific Plan are located within the Height Restriction Zone as listed in the City's General Plan.

The portions of the project area (both the annexation area and the East Gateway Specific Plan) within the Height Restriction Zone identified in the Safety Element of the City's General Plan would be subject to land use guidelines for airport safety compatibility.<sup>33</sup> As with the CLUP, these guidelines identify uses that are acceptable, unacceptable or conditionally acceptable with similar requirements. For proposed uses within both the annexation area and the East Gateway Specific Plan area, a restriction of not more than 50 percent structural coverage would apply.

Those portions of the East Gateway Specific Plan within the TPZ also would be conditionally allowed with the restriction that maximum structural coverage not exceed 50 percent of the total land area. The proposed regulating code for the Specific Plan (Chapter 3 of the Specific Plan) provides limits on lot coverage and building heights. As proposed, the Specific Plan would not conflict with the requirements of

---

33 Santa Paula General Plan, Safety Element, Table S-3.

the CLUP or the City's General Plan. Consequently, impacts associated with height restrictions and the TPZ would be less than significant.

***Mitigation Measures***

No mitigation is required.

***Residual Impacts***

Impacts would be less than significant.

**5.8.5.6 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?**

***Impacts***

Safety hazards associated with the Santa Paula Airport are discussed in **Section 5.13 Transportation/Traffic** and are summarized in **Section 5.8.5.5**. Potential impacts were considered less than significant.

***Mitigation Measures***

No mitigation is required.

***Residual Impacts***

Impacts would be less than significant.

**5.8.5.7 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

***Impacts***

The East Gateway Project area is located in an area of Central California that has the potential for residents and employees to encounter human-made and natural hazards, which could cause undue hardship to residents and employees. Human-made hazards include the potential release of hazardous materials; the potential for biological, chemical attacks from foreign and domestic terrorism; and the potential for fires started by humans. Natural hazards include flooding, seismic activity, extreme weather conditions, and fires that are started naturally.

According to the City of Santa Paula's Safety Element, SR 126, 12<sup>th</sup> Street, South Mountain Road and SR 150 are main thoroughfares that may be used by emergency response services during an emergency and, if the situation warrants, the evacuation of the area. These routes are all in close proximity to the East Gateway Project area. During the construction period, activities may require temporary road detours and/or closures resulting in localized increase in traffic and circuitous traffic routes. In addition, during certain periods of construction, the transport of oversized materials and/or equipment may require necessitating the use of large and often slow moving vehicles. These activities could slow down evacuation along these routes and result in a significant impact.

Overall, the implementation of the East Gateway Project would neither result in a reduction of the number of lanes along the evacuation route roadway segments in the area nor result in the placement of an impediment to the flow of traffic. The City of Santa Paula during the development review on each individual project associated with the East Gateway Project would be responsible for ensuring that the future land uses do not impair or physically interfere with an adopted emergency response or evacuation plan.

The City of Santa Paula in cooperation with Ventura County has devised and maintains a Hazard Mitigation Plan that addresses the City's planned response to extraordinary emergencies associated with natural disasters, technological incidents, or national security emergencies. The plan provides operational concepts and identifies sources of outside support that would be provided through mutual aid agreements, state and federal agencies, and the private sector. Through the implementation of a standard development review process and the disaster response plan, impacts would be less than significant.

### **Mitigation Measures**

The following measures have been identified to mitigate the identified impacts:

- 5.8-5** Before issuance of a grading permit for projects within the reorganization (annexation areas) and the East Gateway Specific Plan area the construction contractor must prepare a construction traffic management plan (CTMP). The CTMP must focus on methods to optimize public safety and minimize traffic disruption along SR 126, 12<sup>th</sup> Street, South Mountain Road and SR 150 during project construction. The CTMP must include providing written notification to the City of Santa Paula Police and Fire Department of construction activities that would impede movement (such as a lane closures) along SR 126, 12<sup>th</sup> Street, South Mountain Road and SR 150 to allow emergency response teams to reroute traffic to an alternative route, if needed. The CTMP must be submitted to the City of Santa Public Works Department, the City of Santa Paula Fire Department, and

City of Santa Paula Police Department for review and comment prior to initiation of construction activities.

***Residual Impacts***

Impacts would be less than significant.

**5.8.5.8 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?**

***Impacts***

As indicated previously, the CALFIRE has designated the East Gateway Project area as a local responsibility area and as an area that has been ranked as having little or no threat to having an extreme threat.<sup>34</sup> Similarly, the City of Santa Paula General Plan Safety Element designates the East Gateway Project area as a low range fire hazard area. Due to the low probability of fire hazards and due to the fact that future structures in the East Gateway Project area would be developed in accordance the SPMC, Title 15, Chapter 150: Building Regulations, that include fire prevention measures, impacts would be less than significant.

***Mitigation Measures***

No mitigation is required.

***Residual Impacts***

Impacts would be less than significant.

**5.8.6 CUMULATIVE ANALYSIS**

***Cumulative Impacts***

The potential for cumulative impacts associated with hazards and hazardous materials was assessed based on consideration of the East Gateway Project and related projects in the City of Santa Paula. These related projects are identified in **Section 4.0, Cumulative Impact Analysis**.

It is anticipated that related projects would result in an incremental increase in the amount of hazardous materials transported, used, treated, stored, and disposed area-wide. Although each development site

---

34 California Department of Forestry and Fire Protection, Fire Threats, 2007 [http://frap.cdf.ca.gov/projects/wui/525\\_CA\\_wui\\_analysis.pdf](http://frap.cdf.ca.gov/projects/wui/525_CA_wui_analysis.pdf); accessed on July 8, 2012

has potentially unique hazardous materials considerations, it is anticipated that all hazardous materials delivered and hazardous waste removed from the Project site and each cumulative project site would be in accordance with Title 24 of the Code of Federal Regulations. In addition, related projects (if applicable) would be required to prepare an annual inventory of hazardous materials used on site and submit a business emergency plan to the City for an annual review, as required by Emergency Planning and Right-to-Know Act (SARA Title III) and Chapter 6.95 of the California Health and Safety Code. For these reasons, cumulative impacts associated with related projects would be less than significant. As discussed above, the East Gateway Project would not result in significant public hazards as a result of hazardous materials used, treated, stored, or disposed. The East Gateway Project would comply with all applicable laws and regulations related to the transport, use, treatment, storage, and disposal of hazardous materials. Because East Gateway Project impacts would be less than significant, the Project's contribution to these impacts would not be cumulatively considerable.

It is possible that a number of the related projects would involve significant renovation or demolition activities, which could subject construction workers or other persons to health and safety risks through exposure to hazardous material. The individual workers or persons potentially affected by exposure would vary from project to project. It is anticipated that each related project would adhere to applicable federal, state, and local requirements that regulate worker and public safety. As a result, cumulative impacts would be less than significant. The East Gateway Project, as well as related projects, would adhere to established regulations. Consequently, East Gateway Project impacts would not be cumulatively considerable and would be less than significant.

It is also possible that a number of the related projects could expose construction workers and other persons to contaminated soil. It is anticipated that future development would adhere to applicable federal, state, or local laws, and regulations that govern the disposal and cleanup of contaminants. As a result, cumulative impacts would be less than significant. Related projects may be located on or near a site included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. It is anticipated that development of these related projects would comply with applicable laws and regulations pertaining to hazardous wastes, and that risk with identified hazardous material sites would be eliminated or reduced through proper handling, disposal practice, and/or cleanup procedures. Development would be denied by the City if adequate cleanup or treatment is not feasible. Accordingly, cumulative impacts to the public or environment associated with development on or near listed contaminated sites would be less than significant. Because the East Gateway Project hazards and hazardous materials impacts would be less than significant, the Project's contribution cumulatively to these hazards and hazardous materials impacts would not be considerable

### ***Mitigation Measures***

Implementation of **Mitigation Measures 5.8-1 to 5.8-5** have been identified to mitigate the identified impacts on a project-by-project basis.

### ***Residual Impact***

Impacts would be less than significant.

### **5.8.7 REFERENCES**

Documents referenced in the preparation of this hazards and hazardous materials section include the following:

- California Department of Conservation, Division of Oil and Gas, South Mountain Field Map 206, May 13, 2002.
- California Department of Forestry and Fire Protection, Fire Threat Map, 2007.
- Santa Paula General Plan, Safety Element, updated September 2010.
- Environmental Data Resources, Inc., The EDR Radius Map Report with GeoCheck for the East Area 2 – East Telegraph Road/South Hallock, Santa Paula, CA 93060, August 11, 2011.
- Ventura County Airport Land Use Commission, Airport Comprehensive Land Use Plan for Ventura County (Final Report), 2000.
- Ventura County, Ventura County Hazard Mitigation Plan, 2010.