

3.5.1 Introduction

This section identifies and evaluates issues related to hazards from construction and operation of the Shell Guadalupe Dunes Gravel Remediation In-Lieu Proposal and its alternatives. It includes a discussion of the existing hazards on the Project Site and in the vicinity, as well as regulations applicable to the Proposed Project. Potential impacts are evaluated and where applicable, mitigation measures are proposed to reduce impacts.

The information in this section is based on the 1982 Final Environmental Impact Report (EIR), associated studies, information provided by the Dunes Center and the City of Santa Maria, and regional information available in previous environmental impact reports prepared by the County.

3.5.2 Environmental Setting

3.5.2.1 Hazardous Materials and Waste

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under Title 22 of the California Code of Regulations (CCR), the term “hazardous substance” refers to both hazardous materials and hazardous wastes. Both of these are classified according to four properties: (1) toxicity, (2) ignitability, (3) corrosiveness, and (4) reactivity (22 CCR 11, and Article 3). A hazardous material is defined in CCR Title 22 as follows:

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 reversible, 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 (22 CCR 66260.10).

Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials.

Project Site

The Project Site is not known to contain any hazardous materials or waste. Site assessments after abandonment of the Husky Oil wells and facilities confirmed there to be no hazardous levels of materials in the soil or groundwater. The gravel that remains on-site from the Husky Oil operations is considered fully remediated by the County and thus does not present a hazard upon exposure or processing. No hazardous waste is currently generated at the Project Site.

3.5.2.2 Oil Extraction Areas

Project Site

The Project Site was used by Husky Oil Company for drilling and production of five oil and gas wells beginning in 1983. The drilling island (Site D) is located approximately 240 feet from the existing Gordon Sand Company access road. The last producing well was abandoned in 1989 with all facilities, pipelines and power poles being abandoned by the end of 1990 in accordance with California Division of Oil, Gas and Geothermal Resources regulations. Site assessments were conducted that confirmed that no hazardous levels of any materials were present in the soils or in the groundwater.¹ These assessments and a Remedial Action Plan (RAP) to remove crude-impacted soils within the fenced area were forwarded to the County Environmental Health Department and to the Regional Water Quality Control Board (RWQCB).² Upon review of these findings, these agencies deferred oversight to the County Petroleum Department, which approved the RAP in July 1992. In 1997, the remaining features were removed, including the fence surrounding the Site, steel plates on sections of the access road, and small amounts of near surface crude oil/asphaltic material near the abandoned wells.³

3.5.3 Regulatory Setting

3.5.3.1 Federal

Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established an Environmental Protection Agency (EPA)-administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the “cradle to grave” system of regulating hazardous wastes.

Clean Water Act/Spill Prevention, Control, and Countermeasure Rule

The CWA (33 U.S. Government Code [USC] 1251 et seq., formerly the Federal Water Pollution Control Act of 1972) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of waters of the United States. As part of the CWA, EPA oversees and enforces the Oil Pollution Prevention regulation contained in 40 Code of Federal Regulations (CFR) 112, which is often referred to as the “SPCC Rule” because it requires facilities to prepare, amend, and implement spill prevention, control, and countermeasure (SPCC) plans. A facility is subject to SPCC regulations if a single oil storage tank has a capacity greater than 660 gallons, the total aboveground oil storage capacity exceeds 1,320 gallons, or the underground oil storage

¹ Binder, C., Santa Barbara County Environmental Health Service. (1993, May 25). RE: Swepi Guadalupe Oilfield Site, Guadalupe, CA, SMU Site #13.

² Ruhl, A. J., Shell Western E&A Inc. (1992, July 28). RE: Remedial action plan for Guadalupe Oil Field.

³ Notice of Pending Decision/Intent to Issue an Appealable Coastal Development Permit (CDP) Case No. 96-CDP-010 Guadalupe Dunes Site Restoration.

capacity exceeds 42,000 gallons and, because of its location, the facility could reasonably be expected to discharge oil into or upon the “navigable waters” of the United States.

Other federal regulations overseen by EPA relevant to hazardous materials and environmental contamination include 40 CFR 1(D) (Water Programs) and 40 CFR 1(I) (Solid Wastes). Furthermore, 40 CFR 1(D)(116) sets forth a determination of the reportable quantity for each substance that has been designated as hazardous, and 40 CFR 1(D)(117) applies to quantities of designated substances equal to or greater than the reportable quantities that may be discharged into waters of the United States.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration’s (OSHA’s) mission is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. The OSHA staff establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in 29 CFR 1910.

3.5.3.2 State

Division of Oil, Gas, and Geothermal Resources

The Division of Oil, Gas, and Geothermal Resources (DOGGR) is the state agency responsible for supervising the drilling, operation, maintenance, plugging, and abandonment of oil, gas, and geothermal wells. DOGGR’s regulatory program promotes the sensitive development of oil, natural gas, and geothermal resources in California through sound engineering practices, pollution prevention, and the implementation of public safety programs. DOGGR requires any construction above or near plugged or abandoned oil and gas wells to be avoided and the remediation of wells to current DOGGR standards.

California Environmental Protection Agency

Cal-EPA was created in 1991. It unified California’s environmental authority in a single cabinet-level agency and brought CARB, State Water Resources Control Board (SWRCB), RWQCB, CalRecycle, Department of Toxic Substances Control (DTSC), the Office of Environmental Health Hazard Assessment (OEHHA), and the Department of Pesticide Regulation (DPR) under one agency. These agencies were placed within the Cal-EPA “umbrella” for the protection of human health and the environment to ensure a coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substance Control

DTSC, a department of Cal-EPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the federal RCRA and the California Health and Safety Code (HSC) (primarily Division 20, Chapters 6.5 through

10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

USC 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services (DHS) lists of contaminated drinking water wells, sites listed by SWRCB as having UST leaks or discharges of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites with a known migration of hazardous waste/material.

California Porter-Cologne Water Quality Control Act

The federal CWA places the primary responsibility for the control of water pollution and for planning the development and use of water resources with the individual states, although it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Act, which grants the SWRCB and RWQCBs broad powers to protect water quality and is the primary vehicle for implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency with responsibility for worker safety with respect to the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR 337-340). The regulations specify requirements regarding employee training, the availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

3.5.3.3 Local

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan (inclusive of mandatory and optional Elements) addresses public safety, hazardous materials, and fire hazards. Consistency with these policies is discussed in Section 3.7, *Land Use and Planning*.

Safety Element Supplement

The Safety Element Supplement was adopted in 2000 and republished in May 2009. Divided into two parts, Part A focuses on the role of land-use planning in reducing the risk of public exposure to acutely hazardous materials. It draws upon the County's own experiences and recommended practices of other informed sources to guide consistent and well-informed land-use decisions with regard to public safety. Chapter I addresses facilities that handle acutely hazardous materials and are fixed in location to a single site; and Chapter II addresses gas pipelines, which are considered to

be fixed in location to a corridor and, thus, represent a linear source of risk, which extends along the corridor.

The objectives and policies contained in these chapters address the following two goals:

- **Goal 1:** To provide sufficient guidance to affect well-informed, consistent and equitable land use decisions
- **Goal 2:** To prevent and minimize unnecessary risk to the public, recognizing it is impossible to obtain a zero-risk society.

Policy Hazardous Facility Safety 1-A: Risk Estimates. The County shall employ accurate estimates of risk associated with hazardous facilities to inform discretionary land-use decisions where substantial, preliminary evidence indicates involuntary public exposure to significant risk may result from the land-use decision.

Hazardous Waste Element

The Hazardous Waste Element was adopted in 1990 and republished in May 2009, which emphasizes the need for proper management of current as well as future hazardous wastes with the goal of minimizing the amount of waste generated and reducing the hazard of what is generated. The County Hazardous Waste Management Plan is concerned primarily with hazardous waste issues and not hazardous materials issues. Hazardous wastes are substances of no further intended use which need treatment or disposal, or both, while hazardous materials include new and usable substances. The handling and use of hazardous materials is regulated by a set of legislative and regulatory requirements which falls outside the scope of the Comprehensive Plan. The following goals and policies are relevant to the Proposed Project:

Storage of Hazardous Waste

- **Goal 1:** To protect the public health and safety and the environment from risks posed by improper storage of hazardous materials and hazardous waste.
- **Policy 1:** The County and cities shall encourage the proper storage of hazardous materials and hazardous waste through continued inspection efforts and public education regarding proper storage methods and regulations.

Contaminated Sites

- **Goal 1:** To protect public health and safety and the environment from risks due to the presence of abandoned or contaminated sites.
- **Policy 1:** The County and cities should work with other involved agencies to establish a coordinated interagency effort for identification, regulation, mitigation, and notification of contaminated sites.
- **Policy 2:** The County and cities in conjunction with the State Department of Health Services shall encourage onsite treatment and remediation to reduce the transport of hazardous waste from contaminated sites.

Santa Barbara County Public Health Department, Hazardous Materials Unit

The Santa Barbara County Public Health Department, Environmental Health Services Division is certified by the California Environmental Protection Agency as the Certified Unified Program Agency

(CUPA) for the County of Santa Barbara. The CUPA regulates businesses that handle hazardous materials, generate or treat hazardous waste or operate aboveground or underground storage tanks. CUPA requirements can be found in Health & Safety Code (HSC) Chapter 6.11 and California Code of Regulations (CCR), Title 27, Division 1, Subdivision 4, Chapter 1. CUPA is responsible for administering and managing the Hazardous Materials Release Response Plans & Inventory Program, Underground Storage Tanks, Hazardous Waste Generators, Onsite Hazardous Waste Treatment, Aboveground Petroleum Storage Act, and California Accidental Release Prevention (CalARP).

The Hazardous Materials Unit is also responsible for the Site Mitigation Program, which involves supervision of cleanup at contaminated sites throughout the County. The goal of the program is to identify contaminated sites, and to find a permanent remedy that is technologically feasible, reliable, effectively reduces the danger of contamination, and adequately protects public health, welfare, and the environment.

Santa Barbara County Energy and Minerals Division

The Energy and Minerals Division of the County Planning and Development Department oversees offshore oil and gas activities in the County, as well as onshore facilities that support those offshore operations and oil refineries. The division regulates these activities through policy development, permit processing, environmental review and risk analyses, permit enforcement, and public outreach. As an office working within the Energy and Minerals Division, the County Petroleum Office is responsible for regulation of petroleum-related activities.

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The County Office of Emergency Services prepared the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). The MJHMP focuses on the assessment of identified risks and implementation of loss reduction measures to ensure critical County services and facilities survive a disaster. Topics covered in the plan include flood, wildfire, earthquake, coastal storm, surge/tsunami, landslide/coastal erosion and dam failure in the unincorporated areas of the County.

3.5.4 Environmental Impact Analysis

This section discusses the potential hazards impacts associated with the Shell Guadalupe Dunes Gravel Remediation In-Lieu Proposal.

Table 3.5-1 below provides a summary of the impacts related to hazards from the Proposed Project and Alternatives.

3.5.4.1 Thresholds of Significance

CEQA Guidelines

Appendix G of the State California Environmental Quality Act (CEQA) Guidelines states that a project is considered to have a significant impact related to hazards if it would result in any of the following.

- 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 involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
- Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area.
- Be located within the vicinity of a private airstrip and 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.

County of Santa Barbara Environmental Thresholds and Guidelines

County of Santa Barbara Environmental Thresholds and Guidelines Manual

The County's Environmental Thresholds and Guidance Manual (County of Santa Barbara 2008) includes thresholds for electromagnetic fields and public safety, as summarized and presented below, that are relevant in determining project impacts related to hazards.

Public Safety

Impacts from risks stemming from the following facilities and activities would be significant if (a) they are subject to a discretionary land-use action (or would communicate its concerns for public safety to another jurisdiction that is making a discretionary decision such as routes for shipping hazardous materials), and (b) initial analysis reveals substantial evidence to support a fair argument that the potential of a significant impact to public safety could result from approval of the project subject to such action.

1. Oil wells and gas wells (unless abandoned or undergoing abandonment), and associated production.
2. Gas and hazardous liquids pipelines, including oil if a significant risk is expected, but exempting existing natural gas pipelines owned by a Californian public utility regulated by the California Public Utilities Commission and operated for the purpose of delivering gas directly to the Goleta storage field or consumers (except activities related to liquefied natural gas), and exempting new low pressure distribution pipelines (125 pounds per square inch [psig] or lower) operated by a Californian public utility and regulated by the California Public Utilities Commission.
3. Oil and/or gas processing and storage facilities, including facilities for removing sulfur, removing gas liquids, and compressing gas.

4. Oil refineries.
5. Handling, storage, and transport of compressed natural gas or methanol related to facilities for refueling motor vehicles with these materials.
6. All handling, storage, and transport of chlorine in containers with a capacity of one ton or more, or an equivalent amount of chlorine in bottles or cylinders connected through a common header.
7. Handling, storage, and transport of anhydrous ammonia in containers with a capacity of one ton or more, or an equivalent amount of anhydrous ammonia in bottles or cylinders connected through a common header.
8. Handling, storage, and transport of acutely hazardous rocket propellants such as nitrogen tetroxide (including instances where the County would communicate with other jurisdictions about discretionary actions that affect public safety in this County such as designation of routes for transporting hazardous materials).
9. Handling, storage, and transport of spent radioactive fuel and other high-level, radioactive materials (including instances where the County would communicate with other jurisdictions about discretionary actions that affect public safety in this County such as the designation of route for transporting hazardous materials).
10. Storage of natural gas liquids, including liquefied petroleum gas, unless such storage is limited to a single container with a maximum capacity of 10,000 gallons or less and does not require refilling more than once weekly.
11. Facilities of a type not addressed in 1-10 above, and not exclusively dedicated to retail distribution of consumer products (such as gasoline stations, or hardware, paint, and dry-cleaning stores) that: (a) use a classified Class A or B explosive (per Title 49, CFR, 171-179); or (b) use substances classified as high-level radioactive materials; or (c) use specified quantities of regulated substances (pursuant to Title 19 of the California Code of Regulations, Division 2, Chapter 4.5) and meet all of the following criteria.
 - a. The regulated substance(s) is stored as a compressed gas or liquefied compressed gas, or is expected to vaporize or evaporate quickly upon release (e.g., through failure of container, piping, or valve), or is stored as a liquid at a temperature that exceeds its boiling point.
 - b. The regulated substance(s) has the potential to cause a significant risk to public safety according to the County's environmental thresholds. (For example, the regulated substance(s) exists as a gas or vapor upon accident release, and will either release into the open atmosphere or become dangerously explosive in a confined environment.)
 - c. The regulated substance(s) is associated with a specific activity that is generally considered to be incompatible with surrounding land uses.
12. All development proposed in proximity to one or more existing hazardous facilities as described above, unless (a) the hazardous facility(ies) are inoperative for the purpose of abandonment, or (b) the proposed development is a single family residential unit which the County considers to be a voluntary exposure to the hazardous facility, or (c) the proposed development does not require a discretionary land-use action.

In cases 1 through 11 listed above, these thresholds apply to risks imposed on present and reasonably projected future land use, considering principally permitted uses under current zoning along with any conditional uses that are permitted or under review.

With regard to land uses with transitory populations (e.g., parks, roads, pedestrian and bike paths), these thresholds apply only when these populations are considered to be often present or to often flow continuously (e.g., a frequently used recreational park or frequently traveled road). They do not apply when transitory populations are considered to be sporadic or often absent (e.g., hiking trails and other uses where the infrequent presence of people renders inclusion herein as overly speculative).

These thresholds do not apply to occupational safety (i.e., employees of the hazardous facility or people who visit the hazardous facility to provide services or conduct business).

In addition, impacts would be significant if a risk analysis conducted for a project results in a societal risk spectrum that falls in the amber or red zones of the public fatality or public injury risk spectrums as presented in Figures 1 and 2 of the Public Safety Thresholds section of the County of Santa Barbara Environmental Thresholds and Guidelines Manual (County of Santa Barbara 2008).

3.5.4.2 Impacts of the Proposed Project

Because the Proposed Project would not result in any activities that would alter baseline conditions, implementation of the Proposed Project would not result in any storage or generation of hazardous materials, increases in fire hazards, or impacts to former oil or gas pipelines. As identified in Section 3.5.2, *Environmental Setting*, the remnant gravel that would remain on site under the Proposed Project is considered non-hazardous by the County, as confirmed in site assessments performed by the Applicant. Therefore, conditions would remain as they are described under the existing setting and no impacts to hazards would occur as a result of the Proposed Project and no mitigations would be required.

3.5.4.3 Impacts of the No Project Alternative

Impact ALT1-HAZ-1. Hazardous Materials Release during Construction.

The No Project Alternative would remove all the remnant gravel from the Project Site (Upper Area, Road Site, Site 2, and Site D), pursuant to Permit Condition #31 of 82-CP-75(cz). Activities associated with this alternative would include mining of the sand areas containing gravel, a mobile wet screening operation, off-site disposal of the gravel, and return of sand to the mining areas. Equipment for the gravel removal would include a flatbed work truck with a small attached hydro-crane lifting unit and a service truck with a four to six man work crew; front end loaders with 4.5-cubic yard (cy) buckets; and a screen/sifter unit. The process plant would consist of a double deck, high frequency vibrating screen conveyor belt machine, with the material brought by rubber tire bucket loaders. The process plant would be powered by two on-site generators. Additionally, two 20-cy rollaway bins would be loaded with gravel then transported on single trailer trucks to off-site locations. These activities are expected to take approximately 5 to 7 months to complete and would create the potential for accidental release of fuels, oils, lubricants, and other hazardous materials while such machinery is operating on and around the Project Site. If a fuel tank or an oil line were ruptured, these hazardous materials would be released onto the county park or roads, presenting a risk to public health and safety. Such spills are considered low probability as all equipment would be

stored overnight in the staging area and all fueling would be restricted to the staging area as well. However, equipment can malfunction or suffer damage when operating in a dynamic environment like the Rancho Guadalupe Dunes County Park. If such a spill did occur, the impact could be significant. Mitigation measures included in the 1982 Final EIR require that all spills of greater than 1,000 gallons should be reported to the County Planning Department and Petroleum Administrator within 24 hours, and in the event of such a spill the operator should excavate and remove contaminated soils and replace with soils of the same type and horizon. These mitigation measures would ensure that any accidental releases during gravel sifting under this alternative are properly handled. Impacts are considered to be less than significant after mitigation (Class II) with implementation of these mitigation measures.

Impact ALT1-HAZ-2. Safety from Hazardous Conditions during Construction.

The presence and operation of large construction equipment and construction crews would pose a safety risk to recreationist at the Rancho Guadalupe Dunes County Park during all phases of mining, screening, and transportation of material. The removal operations would include the use of sand and gravel operations screening equipment, including but not limited to feed hoppers, conveyors, pumps, hydrocyclones, etc. Approximately 62 round trips by two single-trailer semi trucks would also be used for transport of the gravel.

The total operation period for the alternative is estimated to extend 5 to 7 months. The areas of active work are located in a portion of the Rancho Guadalupe Dunes County Park that is not readily accessible to the public. The remainder of the Rancho Guadalupe Dunes County Park will remain open for public use. However, there would be minimal interaction between the public and the Project Site because the Project Site is located far enough away from the popular recreational areas of the Rancho Guadalupe Dunes County Park. Therefore, hazard impacts of the No Project Alternative would be less than significant (Class III).

3.5.4.4 Impacts of the Partial Gravel Removal Alternative

Impact ALT2-HAZ-1. Hazardous Materials Release during Construction.

This alternative would involve the removal of gravel from the most visually prominent areas, as observed by recreational users of Rancho Guadalupe Dunes County Park. This would result in the complete removal of gravel from Site D and from the eastern portion of the road site. Approximately 73,438 cy of sand impacted by gravel would be excavated and processed, resulting in removal of approximately 698 cy of gravel. The remaining 539 cy of gravel would be left in place. Similar to the No Project Alternative, activities associated with this alternative would include mining of the sand areas containing gravel, a mobile wet screening operation, off-site disposal of the gravel, and return of sand to the mining areas. Equipment for the gravel removal would be the same as for the No Project Alternative, including a flatbed work truck with a small attached hydro-crane lifting unit and a service truck with a four to six man work crew; front end loaders with 4.5-cy buckets; and a screen/sifter unit. The process plant would consist of a double deck, high frequency vibrating screen conveyor belt machine, with the material brought by rubber tire bucket loaders. The process plant would be powered by two on-site generators. Two 20-cy rollaway bins would be loaded with gravel then transported on single trailer trucks to off-site locations. These activities are expected to take approximately 3-4 months to complete and would create the potential for accidental release of fuels, oils, lubricants, and other hazardous materials while such machinery is operating on and around the Project Site. If a fuel tank or an oil line were ruptured, these hazardous materials would be released

onto the county park or roads, presenting a risk to public health and safety. Such spills are considered low probability as all equipment would be stored overnight in the staging area and all fueling would be restricted to the staging area as well. However, equipment can malfunction or suffer damage when operating in a dynamic environment like the Dunes. Therefore, while the chance of a malfunction or accident is less likely than that for the no project alternative due to the smaller scale and duration, such malfunctions or accidents that could lead to release of hazardous materials would be significant impacts. Mitigation measures included in the 1982 Final EIR require that all spills of greater than 1,000 gallons should be reported to the County Planning Department and Petroleum Administrator within 24 hours, and in the event of such a spill the operator should excavate and remove contaminated soils and replace with soils of the same type and horizon. These mitigation measures would ensure that any accidental releases during gravel sifting under this alternative are properly handled. Impacts are considered to be less than significant after mitigation (Class II) with implementation of these mitigation measures.

Impact ALT2-HAZ-2. Safety from Hazardous Conditions during Construction.

The presence and operation of large construction equipment and construction crews would pose a safety risk to recreational users at the county park during all phases of mining, screening and transportation of material. The removal operations would include the use of sand and gravel screening equipment, including but not limited to feed hoppers, conveyors, pumps, hydrocyclones, etc. Two 20-cy rollaway bins would be loaded with gravel then transported on single trailer trucks to off-site locations.

The total operation period for this alternative is estimated to extend 2 to 3 months. The areas of active work are located in a portion of the County park that is not readily accessible to the public. The remainder of the County park will remain open for public use. However, there will be minimal interaction between the public and the Project Site, because the Project Site is located far enough away from the popular recreational areas of the Rancho Guadalupe Dunes County Park. Therefore, these impacts to hazards from implementation of the Partial Gravel Removal Alternative would be less than significant (Class III).

Table 3.5-1. Summary of Hazard Impacts

Hazards Impacts	Mitigation Measure	Residual Significance
Proposed Project		
No Impact	N/A	N/A
No Project Alternative		
Impact ALT1-HAZ-1. Hazardous Materials Release During Construction	MM 1982-HAZ-1	Less than Significant after Mitigation (Class II)
Impact ALT1-HAZ-2. Hazardous Conditions During Construction	No mitigation required	Less than Significant (Class III)
Partial Gravel Removal Alternative		
Impact ALT2-HAZ-1. Hazardous Materials Release During Construction	MM 1982-HAZ-1	Less than Significant after Mitigation (Class II)
Impact ALT2-HAZ-2. Hazardous Conditions During Construction	No mitigation required	Less than Significant (Class III)

