

3.10 Hazards and Hazardous Materials

This section describes the existing setting related to hazards and hazardous materials based on the current conditions, a regulatory database search for the action area, and the federal, state, and local regulations related to hazardous materials that would apply to the North Bay Water Recycling Program (NBWRP). Based on an evaluation of the existing conditions, the potential for hazards and hazardous materials impacts related to construction and operation of NBWRP is discussed. The Impacts and Mitigation Measures section defines significance criteria used for the impact assessment and presents a discussion of potential project-related impacts. Determination of significance of impacts in this EIR/EIS apply only to CEQA, not to NEPA.

3.10.1 Affected Environment/Setting

Materials and waste are considered hazardous based on four characteristics: toxicity (if they are poisonous), ignitability (can be ignited), corrosivity (corrode other materials), or reactivity (react violently, explode, or generate vapors when mixed with air). According to the California Health and Safety Code (Section 25501), “hazardous material” means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials released during past industrial and commercial operations could be encountered during excavation for the NBWRP, and require proper handling, transport, and disposal. In addition, chemicals used at the wastewater treatment plants (WWTPs) associated with the NBWRP may be considered hazardous materials and would be subject to appropriate regulations.

Regional Conditions – Hazardous Materials

Land use within the action area is a mix of agriculture and open space in the rural areas and commercial, industrial, and residential use in the urban areas, which primarily surround the cities of San Rafael, Novato, Sonoma, and Napa. Agricultural operations involve the use of petroleum fuels, pesticides, and fertilizers. Pesticides and fertilizers are applied directly to the soil, and potential releases of petroleum fuels can occur through spills and leaks from storage tanks. In addition, there is potential for release of hazardous materials from unregulated, private refuse dumps in remote areas. Commercial and industrial operations have the potential to release hazardous materials to soil and groundwater within the action area. Potential sources include gasoline service stations and industries that use solvents or other hazardous materials. Residential land use can also result in the release of hazardous materials.

A regulatory database search of properties was conducted within one-eighth mile (approximately 660 feet) of project components associated with the Phase 1 implementation plan (Environmental Data Resources [EDR], 2008a-c). This buffer was chosen based on professional judgment considering the use of hazardous materials in the action area (comprised of mainly open space and rural land uses, except within the vicinity of the cities of San Rafael, Novato, Sonoma, and Napa) and the size of the action area. The database search involved a search of more than 60 different federal, state, tribal, and EDR proprietary environmental databases for sites with

documented use, storage, or release of hazardous materials or petroleum products. The EDR reports identified historically contaminated properties, businesses that use, generate, or dispose of hazardous materials or petroleum products in their operations, and active contaminated sites that are currently under assessment and/or remediation. Databases that are no longer updated, such as the Cortese List, do not provide relevant information and are not discussed further. Facilities or sites that are closed following remediation and the remediation effort has satisfied the regulatory agency overseeing the effort, or sites that have not experienced release of hazardous materials, are not discussed further in this section.

The database search results include facilities that handle hazardous materials but have not necessarily had a release to the environment. The databases include the Resource Conservation and Recovery Act (RCRA) large- and small-quantity generator lists (RCRA-LQG and RCRA-SQG), RCRA sites not generating hazardous waste (RCRA-NonGen), the Facility Index System Database (FINDS), the Solid Waste Facilities/Landfill Sites Database (SWF/LF), the California State Water Resources Control Board Waste Discharge System Database (CA-WDS), the Waste Management Unit Database (WMUDS/SWAT), the Facility Inventory Database (CA FID UST), the Underground Storage Tank Database (UST), the Recycling Facilities in California Database (SWRCY), the Aboveground Storage Tank Database (AST), the Drycleaner Database (CLEANERS), the Hazardous Waste Manifests Database (HAZNET), and the Emissions Inventory Database (EID). For the purposes of this analysis, it was assumed that such facilities do not pose a threat to human health or the environment, and they were eliminated from further analysis. Further sites that have been investigated but where no remediation was indicated, such as proposed school sites listed on the School Sites Evaluated by the California Department of Toxic Substances (DTSC) database (SCH) and the DTSC Mitigation and Brownfields Reuse Database (ENVIROSTOR) are not discussed. Additionally, databases that are no longer updated, such as the Cortese List, the Statewide Environmental Evaluation and Planning System UST listing (SWEEPS UST), and the California Bond Expenditure Plan (CA BOND EXP. PLAN) do not provide relevant information and are not discussed further. Along with this, sites that are documented as closed cases, are not included in the evaluation. This includes the Comprehensive Environmental Response, Compensation, and Liability Information System No Further Remedial Action Planned Database (CERCLIS-NFRAP).

The results of the database search were reviewed and are discussed below for each Member Agency. The maps from the EDR studies showing hazardous materials sites in and around the action area can be found in **Appendix 3.10A**.

LGVSD

Table 3.10-1 identifies the databases that were searched, a brief database description, and the total number of records found for the LGVSD service area.

As shown in **Tables 3.10-1** and **3.10-2**, the database search indicates 53 sites on federal or state regulatory databases within the LGVSD service area; 45 sites are located in Novato and eight are located in San Rafael (EDR, 2008a). Some sites are listed in multiple regulatory databases. The databases, in which the 53 sites are listed, are described below.

**TABLE 3.10-1
RESULTS OF THE HAZARDOUS MATERIALS DATABASE SEARCH
FOR THE LGVSD SERVICE AREA, CITY OF NOVATO**

Database	Brief Database Description	Records Found
Federal Records		
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System Database	1
CERC-NFRAP	CERCLIS No Further Remedial Action Planned Database	1
RCRA-SQG	RCRA Small Quantity Generator Database	3
RCRA-NonGen	RCRA Sites Not Generating Hazardous Waste Database	1
FUDS	Formerly Used Defense Sites Database	1
FINDS	Facility Index System Database	7
State Records		
SCH	School Sites Evaluated by DTSC Database	1
SWF/LF	Solid Waste Facilities/Landfill Sites Database	1
CA-WDS	California Water Resources Control Board Waste Discharge System Database	1
WMUDS/SWAT	Waste Management Unit Database	1
LUST	Leaking Underground Storage Tank Database	1
SLIC	Spills, Leaks, Investigations, and Cleanups Section Database	1
UST	Underground Storage Tank Database	5
HIST UST	Historic Underground Storage Tank Database	1
CHMIRS	California Hazardous Materials Incident Report System Database	1
HAZNET	Hazardous Waste Manifests Database	16
EMI	Emissions Inventory Database	1
ENVIROSTOR	DTSC Site Mitigation and Brownfields Reuse Database	1
Total Records Found		45

SOURCE: EDR, 2008a

**TABLE 3.10-2
RESULTS OF THE HAZARDOUS MATERIALS DATABASE SEARCH
FOR THE LGVSD SERVICE AREA, CITY OF SAN RAFAEL**

Database	Brief Database Description	Records Found
Federal Records		
FUDS	Formerly Used Defense Sites Database	1
State Records		
Cortese	Contaminated Water Wells Database	1
LUST	Leaking Underground Storage Tank Database	1
SLIC	Spills, Leaks, Investigations, and Cleanups Section Database	1
UST	Underground Storage Tank Database	2
CA FID UST	Facility Inventory Database	0
HIST UST	Historic Underground Storage Tank Database	0
HAZNET	Hazardous Waste Manifests Database	2
Total Records Found		8

SOURCE: EDR, 2008a

CERCLIS

The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database contains sites that are either on or proposed for inclusion on the National Priorities List (NPL). The NPL is a list of hazardous waste sites that are eligible for long-term remedial action financed under the federal Superfund program. The following CERCLIS record was found in the LGVSD Service Area:

- Hamilton Air Force Base (Novato)

FUDS

The Formerly Used Defense Sites Properties (FUDS) list contains sites at which the U.S. Army Corps of Engineers actively works or prepares to undertake cleanup action. The following FUDS sites were identified in the LGVSD Service Area:

- Hamilton Army Airfield (Novato)
- San Francisco Nike Battery 93 (San Rafael)

LUST

The Leaking Underground Storage Tank (LUST) database lists LUST incidents reported by the State Water Resources Control Board. The LUST sites may release contaminated materials into the soil which has the potential to migrate off the subject property, typically through contact with groundwater. The following LUST records were found in the LGVSD Service Area:

- McInnis Golf Course (listed as “Leak being confirmed”) (San Rafael)
- Hamilton Army Airfield (Novato)

SLIC

The Spills, Leaks, Investigation, and Cleanup (SLIC) Program database, a Regional Water Quality Control Board (RWQCB) program, includes sites where a hazardous materials spill or leak has occurred. The following SLIC record, excluding one closed case, was found in the LGVSD Service Area:

- Hamilton Army Airfield (Novato)

CHMIRS

The California Hazardous Material Incident Report System (CHMIRS) provides information on reported hazardous material incidents, including accidental releases or spills, from the California office of Emergency Services. The following record appears for the LGVSD Service Area:

- 373 Bolling Circle (Novato)

Novato SD

Table 3.10-3 presents the results of the EDR regulatory database search for the Novato SD service area (EDR, 2008a).

**TABLE 3.10-3
RESULTS OF HAZARDOUS MATERIALS DATABASE SEARCH
FOR THE NOVATO SD SERVICE AREA**

Database	Brief Database Description	Records Found
Federal Records		
CERC-NFRAP	CERCLIS No Further Remedial Action Planned Database	1
RCRA-LQG	RCRA Large Quantity Generator Database	2
RCRA-SQG	RCRA Small Quantity Generator Database	15
ERNS	Emergency Response Notification System Database	6
FINDS	Facility Index System Database	29
State Records		
CA-WDS	California Water Resources Control Board Waste Discharge System Database	4
Cortese	Contaminated Water Wells Database	14
LUST	Leaking Underground Storage Tank Database	16
SLIC	Spills, Leaks, Investigations, and Cleanups Section Database	2
UST	Underground Storage Tank Database	47
CA FID UST	Facility Inventory Database	13
HIST UST	Historic Underground Storage Tank Database	26
SWRCY	Recycling Facilities in California Database	1
AST	Aboveground Storage Tank Database	6
SWEEPS UST	Statewide Environmental Evaluation and Planning System Database	14
CHMIRS	California Hazardous Materials Incident Report System Database	7
Notify 65	State Water Resources Control Board's Proposition 65 Database	3
CLEANERS	Drycleaner Database	3
HAZNET	Haznet Database	77
EMI	Emissions Inventory Database	9
ENVIROSTOR	DTSC Site Mitigation and Brownfields Reuse Database	4
Total Records Found		299

SOURCE: EDR, 2008b

As shown in Table 3.10-3, a total of 299 sites are listed on federal or state regulatory databases in the project vicinity within the Novato SD service area. Some sites appear on more than one regulatory database listing.

ERNS

The Emergency Response Notification System (ERNS), administered by the U.S. Environmental Protection agency (USEPA), provides information on reported releases of oil and hazardous substances. The following sites appear on the ERNS database in the Novato SD service area:

- 777 San Marin Drive
- 7473 Redwood Boulevard (2 listings)
- 7595 Redwood Boulevard
- 1625 Hill Road
- 200 Vintage Way

LUST

The following LUST records, excluding closed cases, were reported for the Novato SD service area:

- H&J Tire (listed as “Leak being confirmed”)
- Unocal (listed as “Remedial action (cleanup) underway”)
- Novato Unified School District (listed as “Preliminary site assessment workplan submitted”)
- A&A Gas Station (listed as “Remedial action (cleanup) underway”)
- Big 4 Rents, Inc. (listed as “Pollution Characterization”)
- Novato Bus Facility (listed as “Preliminary site assessment underway”)
- Novato SD (listed as “Remedial action (cleanup) underway”)
- Novato Community Hospital (listed as “Post remedial action monitoring”)
- Shell (listed as “Pollution Characterization”)
- Mobil (listed as “Pollution Characterization”)

SLIC

The following SLIC sites were identified within the Novato SD service area:

- Arnold’s Dismantlers
- Seven To Seven Cleaners (listed as “Remediation Plan Approved”)

CHMIRS

The following CHMIRS records, excluding completed cases, appear for the Novato SD service area:

- 7473 Redwood Boulevard
- 15 Wendy Court
- 1064 Susan Way

Notify 65

The Notify 65 database contains facility notifications concerning any release that could impact drinking water and thereby pose a risk to public health. The following sites appear on the Notify 65 list for the Novato SD Service Area:

- Via Gas Station
- Golden Gate Transit
- Marin County Health

SVCS D

Table 3.10-4 presents the results of the EDR regulatory database search for the SVCS D service area (EDR, 2008b).

There are a total of 237 sites that appear on federal or state regulatory databases in the project vicinity within the SVCS D service area. Some sites appear on more than one regulatory database listing.

**TABLE 3.10-4
RESULTS OF HAZARDOUS MATERIALS DATABASE SEARCH FOR THE SVCSD SERVICE AREA**

Database	Brief Database Description	Records Found
Federal Records		
RCRA-SQG	RCRA Small Quantity Generator Database	10
RCRA-NonGen	RCRA Sites Not Generating Hazardous Waste Database	2
ERNS	Emergency Response Notification System Database	7
FINDS	Facility Index System Database	18
State Records		
SWF/LF	Solid Waste Facilities/Landfill Sites Database	2
CA-WDS	California Water Resources Control Board Waste Discharge System Database	9
Cortese	Contaminated Water Wells Database	19
LUST	Leaking Underground Storage Tank Database	28
SLIC	Spills, Leaks, Investigations, and Cleanups Section Database	1
UST	Underground Storage Tank Database	15
HIST UST	Historic Underground Storage Tank Database	28
SWEEPS UST	Statewide Environmental Evaluation and Planning System Database	18
CHMIRS	California Hazardous Materials Incident Report System Database	11
Notify 65	State Water Resources Control Board's Proposition 65 Database	1
CLEANERS	Drycleaner Database	1
HAZNET	Haznet Database	60
EMI	Emissions Inventory Database	6
ENVIROSTOR	DTSC Site Mitigation and Brownfields Reuse Database	1
Total Records Found		237

SOURCE: EDR, 2008c

ERNS

The following sites appear on the ERNS database for the SVCSD service area:

- 623 1st Street West (2 listings)
- "2½ Up from Highway 37" in Sonoma
- 2nd Street East, 200 Block
- 389 4th Street East
- 379 4th Street
- 238 Todd Road

LUST

The following LUST records, excluding closed cases, were reported for the SVCSD service area:

- Stu's 76 (listed as "Pollution Characterization")
- Broadway Shell of Sonoma (listed as "Remedial Plan")
- Sonoma Fire Dept (listed as "Remedial action (cleanup) underway")
- Mayo Family Property (listed as "Preliminary site assessment underway")
- Chevron #90509 (listed as "Pollution Characterization")

- Unocal #5994 (listed as “Post remedial action monitoring”)
- Sebastiani Vineyards (listed as “Post remedial action monitoring”)
- Sebastiani Vineyards 0155,006.9 (listed as “Remedial action (cleanup) underway”)
- Four Corners Service (listed as “Remedial action (cleanup) underway”)
- Daniel Auto Repair (listed as “Remedial action (cleanup) underway”)
- Batto Property (listed as “Leak being confirmed”)
- Schaal Property (listed as “Pollution Characterization”)
- E.K. Excavating, Inc. (listed as “Remedial action (cleanup) underway”)

SLIC

The following SLIC site was identified within the SVCSD service area:

- Royal Crown Cleaners

CHMIRS

The following CHMIRS records, excluding completed cases, appear for the SVCSD service area:

- 623 1st Street West
- 389 4th Street East (3 listings)
- Sebastiani Vineyards
- 20490 Broadway
- 1283 Felder Road
- 22675 8th Street East (2 listings)

Notify 65

The following site appears on the Notify 65 list for the SVCSD service area:

- Jackpot Station

Napa SD

Results of the EDR regulatory database search for the Napa SD service area are provided in **Table 3.10-5** (EDR, 2008c).

A total of 125 sites appear on federal or state regulatory databases in the Napa SD service area. Some sites appear on more than one regulatory database listing.

ERNS

The following sites appear on the ERNS database for the Napa SD service area:

- 2100 Napa Vallejo
- 2301 Napa-Vallejo Highway

**TABLE 3.10-5
RESULTS OF HAZARDOUS MATERIALS DATABASE SEARCH FOR THE NAPA SD SERVICE AREA**

Database	Brief Database Description	Records Found
Federal Records		
CERC-NFRAP	CERCLIS No Further Remedial Action Planned Database	1
RCRA-SQG	RCRA Small Quantity Generator Database	3
RCRA-NonGen	RCRA Sites Not Generating Hazardous Waste Database	1
ERNS	Emergency Response Notification System Database	2
FTTS	Toxics/Pesticides Data System Database	2
HIST FTTS	Historic Pesticides Data System Database	3
ICIS	Integrated Compliance Information System	1
FINDS	Facility Index System Database	10
State Records		
SWF/LF	Solid Waste Facilities/Landfill Sites Database	1
CA-WDS	California Water Resources Control Board Waste Discharge System Database	3
WMUDS/SWAT	Waste Management Unit Database	1
Cortese	Contaminated Water Wells Database	6
LUST	Leaking Underground Storage Tank Database	7
SLIC	Spills, Leaks, Investigations, and Cleanups Section Database	1
UST	Underground Storage Tank Database	9
CA FID UST	Facility Inventory Database	14
HIST UST	Historic Underground Storage Tank Database	12
AST	Aboveground Storage Tank Database	3
SWEEPS UST	Statewide Environmental Evaluation and Planning System Database	12
CHMIRS	California Hazardous Materials Incident Report System Database	1
VCP	Voluntary Cleanup Program Properties Database	1
CDL	Clandestine Drug Laboratories	1
HAZNET	Haznet Database	26
EMI	Emissions Inventory Database	3
ENVIROSTOR	DTSC Site Mitigation and Brownfields Reuse Database	1
Total Records Found		125

SOURCE: EDR, 2008d

LUST

The following LUST records, excluding closed cases, were reported for the Napa SD service area:

- Pacific Coast Supplies
- Syar Industries, Inc. (2 listings, listed as “Preliminary site assessment underway”)

SLIC

The following SLIC site was identified within the Napa SD service area:

- Syar Industries, Inc. Napa Qua

CHMIRS

The following CHMIRS record appears for the Napa SD service area:

- Napa State Hospital

Regional Conditions- Hazards

LGVSD and Novato SD

According to the map of wildland areas available on the Novato Fire Protection (2008), portions of the proposed pipeline route in both the LGVSD and Novato SD service areas are located in fire hazard zones near wildland areas.

SVCS

According to fire hazard severity mapping by the California Department of Forestry, approximately half of Sonoma County is considered at high or very high risk of wildfire. The highest hazard is found in mountainous areas with dry summers, plenty of fuel, and steep slopes (Sonoma County, 2008). The proposed pipeline corridor is not located within the areas mapped as having high wildland fire hazard.

Napa SD

According to the Napa County Baseline Data Report (2005), Napa County has a high wildland fire potential due to its combination of highly flammable chaparral vegetation, steep inaccessible wildlands, and high levels of recreational use. The proposed pipeline corridor within the Napa SD service area is located within the Napa Valley floor, which has the largest area of high fire hazard. However, the majority of the proposed pipeline corridor is located within the developed area of the City of Napa and nearby unincorporated Napa County, which has a lower fire severity hazard than open grasslands.

3.10.2 Regulatory Framework

Federal

The USEPA is the lead federal agency responsible for enforcing federal regulations regarding hazardous materials. The primary legislation governing hazardous materials are the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the Superfund Amendments and Reauthorization Act (SARA).

RCRA

RCRA regulates the generation, transportation, treatment, storage and disposal of hazardous waste by “large-quantity generators” (1,000 kilograms per month or more) through comprehensive life cycle or “cradle to grave” tracking requirements. The requirements include maintaining inspection logs of hazardous waste storage locations, records of quantities being

generated and stored, and manifests of pick-ups and deliveries to licensed treatment/storage/disposal facilities. RCRA also identifies standards for treatment, storage, and disposal.

CERCLA

CERCLA, also known as Superfund, created a tax on the chemical and petroleum industries to provide for response and cleanup of hazardous substances that may endanger public health or the environment. CERCLA established requirements for abandoned hazardous waste sites and provided for liability of persons responsible for releases of hazardous waste at these sites.

SARA

SARA amended CERCLA to increase state involvement and required Superfund actions to consider state environmental laws and regulations. SARA also established a regulatory program for USTs and the Emergency Planning and Community Right-to-Know Act.

Toxic Substances Control Act (TSCA)

TSCA established the mechanisms by which the USEPA tracks, screens, and tests industrial chemicals that are currently produced or imported into the United States that may pose an environmental or human-health hazard.

Occupational Safety and Health Act

The Occupational Safety and Health Administration (OSHA) administers the Occupational Safety and Health Act, which requires special training of handlers of hazardous materials, notification to employees who work in the vicinity of hazardous materials, and acquisition from the manufacturer of material safety data sheets (MSDS). An MSDS describes the proper use of hazardous materials. The Act also requires and training of employees to remediate any hazardous material accidental releases.

State

The California Department of Toxic Substances Control (DTSC) is primarily responsible for the regulation of hazardous materials in California. DTSC is responsible for the management of hazardous substances and oversees the investigation and remediation of contaminated sites. The San Francisco Bay Regional Water Quality Control Board (RWQCB) is primarily responsible for the protection of groundwater and surface water resources from hazardous materials.

California Hazardous Waste Control Law, California Health and Safety Code, Division 20, Chapter 6.5

The California Hazardous Waste Control Law is the basic hazardous waste statute in California and is administered by DTSC. This law is similar to, but more stringent than RCRA and applies to a broader range of hazardous wastes and requires recycling and waste reduction programs.

Carpenter-Presley-Tanner Hazardous Substances Account Act, California Health and Safety Code, Division 20, Chapter 6.8

The Carpenter-Presley-Tanner Hazardous Substances Account Act authorizes DTSC and the RWQCB to require, oversee, and recover costs for the remediation of sites where contamination of soil and water present a hazard to human health or the environment.

California Occupational Safety and Health Act

The California Occupational Safety and Health Administration (Cal OSHA) regulates worker safety similar to federal OSHA but also requires preparation of an Injury and Illness Prevention Program, an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. In addition, Cal OSHA regulations indirectly protect the general public by requiring construction managers to post warnings signs, limit public access to construction areas, and obtain permits for work considered to present a significant risk of injury, such as excavations greater than five feet.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Cal EPA adopted regulations in 1996 to establish a Unified Hazardous Waste and Hazardous Materials Management Regulatory Program and designated local agencies called Certified Unified Program Agencies (CUPA). The local agencies regulate hazardous substances management with respect to the following areas:

- Hazardous waste generators and hazardous waste onsite treatment;
- USTs;
- Aboveground storage tanks (ASTs);
- Hazardous materials release response plans and inventories (business plans), including Unified Fire Code hazardous materials management plans and inventories; and
- Risk management and accidental release prevention programs.

The CUPAs in the action area include the County of Marin Public Works Department, the County of Sonoma Department of Emergency Services, Hazardous Materials Division, and the County of Napa Department of Environmental Management.

Waters Bill of 1985 (Business Emergency Plan/Hazardous Materials Business Plan)

Administered by the CUPA, the Waters Bill requires facilities, which meet minimum hazardous materials use/storage thresholds to file a Business Emergency Plan (BEP), or a Hazardous Materials Business Plan (HMBP). A BEP or HMBP includes a complete inventory of the hazardous materials being used and stored on a site. Employee training and emergency response plans and procedures for the accidental release of hazardous materials are also included in a BEP.

Safe Drinking Water and Toxics Enforcement Act (Proposition 65)

Administered by the CUPA, the Safe Drinking Water and Toxics Enforcement Act requires businesses, which use hazardous materials to post public notice of release of any accidental hazardous materials, or other potential exposure to materials known to the State of California to cause cancer or reproductive toxicity. The Act prohibits such businesses from releases of hazardous materials into the environment at levels above identified risk levels.

La Follette Bill of 1986 (Risk Management Plan)

Administered by the CUPA, the La Follette Bill requires preparation of a Risk Management Plan (RMP) for commercial operations, which use hazardous materials at defined thresholds. The RMP includes management, engineering and safety studies, and plans for physical improvements to minimize accidental hazardous materials releases. Implementation of the RMP occurs via fire inspections, plan checking, BEP/HMBP disclosure requirements, and filing of the RMP (updated every three years).

Local

Uniform Fire Code (UFC)

The Uniform Fire Code is administered by the CUPA via regular site inspections. The code regulates the type, configuration, and quantity of hazardous materials that may be stored within structures or in outdoor areas.

General Plans

The general plans, policies, and regulations associated with impacts to hazards and hazardous materials within the affected jurisdictions are presented in **Appendix 3.10** of this EIR/EIS.

3.10.3 Environmental Consequences/Impacts

Significance Criteria for Impact Analysis

Based on the Appendix G of the *CEQA Guidelines*, project implementation would have significant impacts and environmental consequences related to hazards and hazardous materials 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 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 that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- Be located within an area covered by 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, and would result in a safety hazard for people residing or working in the action area;
- Be located within the vicinity of a private airstrip and would result in a safety hazard for people residing or working in the action area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Potential issues that would not be applicable to NBWRP or would have no impact and are not discussed further are listed below:

- The NBWRP could result in impacts if there are safety hazards due to proximity of a public airport or private airstrip. There are no airports or airstrips within one mile of proposed aboveground project facilities. Therefore, no impact is expected.
- With oversight by the local CUPA, each WWTP associated with NBWRP has developed a Business Plan that includes an Emergency Response Plan and inventory of hazardous materials that are handled and stored onsite. Policies and procedures for emergency response are also established in the local general plans relevant to the action area, as described above in Section 3.10.2, Regulatory Framework. Compliance with these existing plans, policies and procedures during construction and operation would ensure that the NBWRP will not impair implementation of or physically interfere with adopted emergency response plans. Therefore, no impacts related to that issue are anticipated.
- Construction activities associated with treatment plant upgrades would not involve substantial excavation as to increase exposure to contaminated soil or groundwater, therefore the NBWRP would not result in any impacts from exposure to hazardous materials released from contaminated soil and groundwater.

Environmental Consequences/Impact Analysis

Impact 3.10.1: Exposure to Hazardous Materials. Project construction could expose workers and the public to hazardous materials that could be present in the soil or shallow groundwater encountered during excavation. (Less than Significant with Mitigation)

The NBWRP would require excavation of soils for construction of proposed pipelines, pump stations, and storage facilities. If contaminated soils or groundwater were to be encountered during excavation, exposure to hazardous materials could result in adverse environmental and health effects to both workers and the general public. In general, proposed pipeline routes are

along existing roadways and proposed storage facilities are located within existing WWTP properties. As a result, current use of hazardous materials in the proposed construction areas is expected to be limited. However, there is a potential for release of hazardous materials from historic use of properties along the proposed pipeline routes and other facility sites. Hazardous materials in contaminated soil could be released through dust and could result in exposure to sensitive receptors, including schools within one-quarter mile. This could be a significant impact. However, implementation of **Mitigation Measures 3.10.1a** through **3.10.1d** described below would reduce these potential impacts to a less-than-significant level.

No Project Alternative

The NBWRP would not be implemented under the No Project Alternative, therefore no impact would occur. For a discussion of the No Project under future conditions, see No Action Alternative below.

No Action Alternative

Under the No Action Alternative, which includes consideration of future conditions, it is likely that a subset of water recycling projects would be implemented by the Member Agencies on an individual basis, without the benefit of regional coordination or federal funding.

For comparison to the Action Alternatives, it is estimated that approximately 17.5 miles of new pipeline, 912 HP of pumping capacity, treatment facilities providing 0.5 mgd of tertiary capacity, and approximately 65 AF of storage would be constructed by Member Agencies on an individual basis (see **Chart 3.10-1, No Action**).

Under future baseline (2020) conditions, project impacts associated with the hazardous conditions within the region would not be significantly different from those under existing conditions. Construction and operation of the proposed facilities would subject workers to hazards. However implementation of **Mitigation Measure 3.10.1a** through **3.10.1d**, which includes development of a contingency plan in the event of soil contamination, proper removal of impacted soil, preparation of a Health and Safety Plan that applies to excavation, and inclusion of a Dust Abatement Program, would reduce the impact to less-than-significant-level. A discussion of individual Member Agencies is provided below.

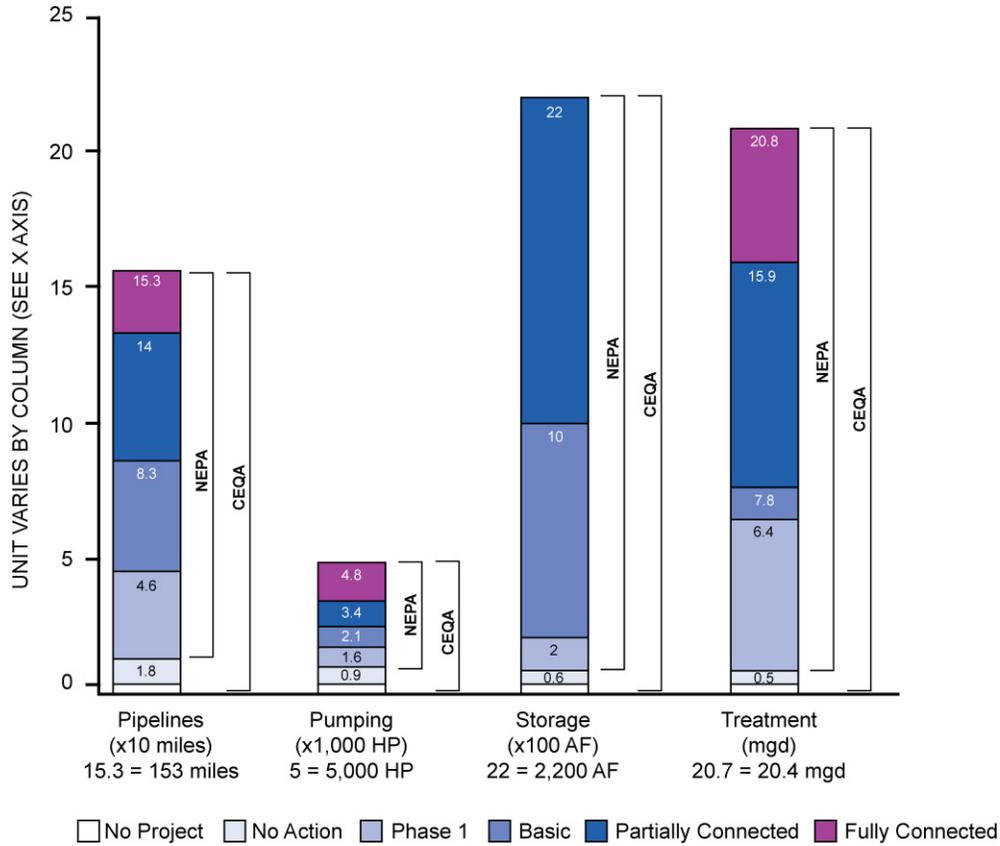
LGVSD/NMWD

There would be no project facilities constructed under the No Action Alternative, therefore no impact would occur.

Novato SD/NMWD

As discussed in Section 3.10.1, sites that may contain contaminated soils have been identified in the Novato SD service area (EDR, 2008a). During project construction in the North Service Area along the pipeline routes along Olive Avenue, Atherton and Redwood Boulevards, and San Marin Avenue and pump station and storage sites, there is potential to encounter hazardous materials in excavated soil or shallow groundwater, since contaminants in soil have the potential to migrate

**CHART 3.10-1
COMPARISON OF NEPA AND CEQA BASELINES FOR PROPOSED FACILITIES, BY ALTERNATIVE**



SOURCE: CDM, 2009

via shallow groundwater from the properties identified. The workers and public could be exposed to hazardous materials present in excavated soil or groundwater, as compared to existing conditions, which could be a significant impact. Implementation of **Mitigation Measures 3.10.1a** through **3.10.1d**, would reduce the impact to a less-than-significant level.

SVCS D

Under the No Action Alternative, Alignment 1A of the Sonoma Valley Recycled Water Project (SVRWP) would be constructed along with one pump station and new storage facility at the SVCS D WWTP. The impact would be similar to that discussed under Novato SD and would be associated with increased potential for exposure of the workers and public to hazardous materials in excavated soil or shallow groundwater from sites identified in the SVCS D Service Area (EDR, 2008b). The impact could be significant. Implementation of **Mitigation Measures 3.10.1a** through **3.10.1d** described below would reduce the impact to a less-than-significant level.

Under the No Action Alternative, the Napa Salt Marsh Restoration Project would include construction of one of the options described in **Chapter 2, Project Description**. The impact for any of the three alternatives would be similar to that discussed under Novato SD and would be associated with increased potential for exposure of the workers and public to hazardous materials in excavated soil or shallow groundwater from sites identified in the SVCSD Service Area (EDR, 2008b) and therefore could be significant. Implementation of **Mitigation Measures 3.10.1a** through **3.10.1d** described below would reduce the impact to a less-than-significant level.

Napa SD

There would be no project facilities constructed under the No Action Alternative, therefore no impact would occur.

Phase 1 (Project level)

Compared to the CEQA Baseline, Phase 1 projects would provide 46 miles of new pipeline, 1,655 HP of pumping capacity, treatment facilities providing 6.4 mgd of tertiary capacity, and 65 AF of storage. Compared to the No Action Alternative (NEPA Baseline), Phase 1 projects would provide 28 miles of new pipeline, 743 HP of pumping capacity, treatment facilities providing 5.9 mgd of tertiary capacity, and no additional storage.

The impacts to workers from exposure to hazardous materials associated with the proposed facilities under Phase 1 would be equivalent to and greater than the impacts discussed for the No Action Alternative, in proportion to the facilities constructed under this alternative. A discussion of impacts from exposure to hazardous materials by Member Agency is provided below.

LGVSD/NMWD

Under Phase 1, LGVSD would upgrade tertiary treatment capacity at the LGVSD WWTP and construct a new booster pump station; NMWD would install one of three pipeline options, described in **Chapter 2, Project Description**, which would connect the LGVSD Recycled Water Treatment Facility to facilities constructed by NMWD.

The following facilities are located within approximately 660 feet of the project components in the LGVSD service area (EDR, 2008a) and may pose a threat to human health or the environment from potential releases of hazardous materials:

- Hamilton Air Force Base,
- Hamilton Army Airfield,
- McInnis Golf Course,
- San Francisco Nike Battery 93, and
- 373 Bolling Circle.

Shallow pipeline excavations are proposed predominantly along existing roadways and would not be expected to encounter hazardous materials in excavated soil or shallow groundwater. However, contaminants in soil have the potential to migrate via shallow groundwater from adjacent properties, such as those listed above. In addition, excavation along existing railroad grades may encounter soils impacted by hazardous materials (e.g., polycyclic aromatic hydrocarbons from creosote-treated rail ties) at the surface or at shallow depths. Therefore, as

compared to existing conditions, there is a greater potential for exposure of workers and the public to hazardous materials in excavated soil or groundwater. This could be a significant impact. Implementation of **Mitigation Measures 3.10.1a** through **3.10.1d**, as discussed below, would reduce the impact to less-than-significant level.

Substantial excavation is not expected to occur during construction of the new pump station at the LGVSD WWTP property, therefore hazardous materials are not expected to be encountered during excavation. However, the potential does exist for hazardous materials to migrate in shallow groundwater from adjacent properties. The impact would be similar in nature to that discussed for the pipelines.

Novato SD/NMWD

The following facilities are located within 660 feet of the project components in the Novato SD service area (EDR, 2008b) and may pose a threat to human health or the environment from potential releases of hazardous materials:

- A&A Gas Station,
- Arnold's Dismantlers,
- Big 4 Rents, Inc.,
- Golden Gate Transit,
- H&J Tire,
- Marin County Health,
- Mobil,
- Novato Bus Facility,
- Novato Community Hospital,
- Novato Sanitary District,
- Novato Unified School District,
- Seven To Seven Cleaners,
- Shell,
- Unocal,
- Via Gas Station,
- 1625 Hill Road,
- 7473 Redwood Boulevard,
- 7595 Redwood Boulevard,
- 777 San Marin Drive,
- 1064 Susan Way,
- 200 Vintage Way, and
- 15 Wendy Court.

Potential construction-related impacts would be similar to those discussed under LGVSD. Please refer to the discussion above.

SVCS

The following facilities are located within 660 feet the NBWRP components in the SVCS service area (EDR, 2008c) and may pose a threat to human health or the environment from potential releases of hazardous materials:

- Batto Property,
- Broadway Shell of Sonoma,
- Chevron #90509,
- Daniel Auto Repair,
- E.K. Excavating, Inc.,
- Four Corners Service,
- Jackpot Station,
- Mayo Family Property,
- Royal Crown Cleaners,
- Schaal Property,
- Sebastiani Vineyards,
- Sonoma Fire Department
- Stu's 76,
- Unocal #5994,
- 623 1st Street West,
- 2 ½ Up from Highway 37 in Sonoma,
- 2nd Street East, 200 Block,
- 379 4th Street,
- 389 4th Street East,
- 22675 8th Street East,
- 20490 Broadway,
- 1283 Felder Road, and
- 238 Todd Road.

Construction of a new water storage pond and new pump station would occur within the existing SVCSD WWTP property and would not be expected to encounter hazardous materials. Potential impacts from installation of the proposed pipelines would be similar to those discussed under LGVSD. Please refer to the discussion above.

Under Phase 1, impacts related to the Napa Salt Marsh Restoration Project would be equivalent to those under the No Action Alternative.

Napa SD

The following facilities are located within 660 feet of the NBWRP components in the Napa SD service area and may pose a threat to human health or the environment from potential releases of hazardous materials:

- Napa State Hospital,
- Pacific Coast Supplies,
- Syar Industries, Inc.,
- 2100 Napa Vallejo, and
- 2301 Napa-Vallejo Highway.

Reconfiguration of existing storage ponds would occur within the existing Napa SD WWTP property and would not be expected to encounter hazardous materials. New pump stations would be constructed at locations away from the existing WWTP property, and as such may encounter hazardous materials in soil or groundwater from historic land uses at these sites or at adjacent sites from which contaminants could migrate via groundwater. The impacts would be similar to those for SVCSD (see above).

Under Phase 1, there is increased potential during construction of MST Local Option 1 for exposure to hazardous materials in excavated soil or shallow groundwater from sites within the Napa SD service area (EDR, 2008c). Implementation of **Mitigation Measures 3.10.1a** through **3.10.1d** described below would reduce this impact to a less-than-significant level.

Alternative 1: Basic System (Program level)

Compared to the CEQA Baseline, the Basic System projects would provide 83 miles of new pipeline, 2,158 HP of pumping capacity, treatment facilities providing 7.8 mgd of tertiary capacity, and 1,020 AF of storage. Compared to the No Action Alternative (NEPA Baseline), Basic System would provide 65 miles of new pipeline, 1,246 HP of pumping capacity, treatment facilities providing 7.3 mgd of tertiary capacity, and 955 AF of storage.

The impacts to workers from exposure to hazardous materials associated with the proposed facilities under the Basic System would be equivalent to and greater than the impacts discussed for Phase 1, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

No additional pipelines or pump stations are proposed within the LGVSD service area under the Basic System, so impacts would be the same as under Phase 1.

Novato SD/NMWD

The impacts in the Novato SD service area would be similar to those under Phase 1 and **Mitigation Measures 3.10.1a** through **3.10.1d** would apply to the Basic System.

SVCS D

The Basic System would include additional pipelines and pumping capacity for SVCS D as compared to Phase 1, however the impacts in the SVCS D service area would be similar to those under Phase 1 and **Mitigation Measures 3.10.1a** through **3.10.1d** would apply to the Basic System.

Under the Basic System, impacts related to the Napa Salt Marsh Restoration Project would be equivalent to those under Phase 1.

Napa SD

The Basic System would include additional pipelines and pumping capacity for Napa SD as compared to Phase 1, however the impacts in the Napa SD service area would be similar to those under Phase 1 and **Mitigation Measures 3.10.1a** through **3.10.1d** would apply to the Basic System.

Alternative 2: Partially Connected System (Program level)

Compared to the CEQA Baseline, the Partially Connected System would provide 139 miles of new pipeline, 3,454 HP of pumping capacity, treatment facilities providing 15.9 mgd of tertiary capacity, and 2,220 AF of storage. Compared to the No Action Alternative (NEPA Baseline), the Partially Connected System would provide 122 miles of new pipeline, 2,542 HP of pumping capacity, treatment facilities providing 15.4 mgd of tertiary capacity, and 2,155 AF of storage.

The impacts from exposure to hazardous materials associated with the proposed facilities under the Partially Connected System would be equivalent to and greater than the impacts discussed for the Basic System, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Impacts associated with construction for LGVSD under the Partially Connected System would include impacts from construction of additional pipelines to Peacock Golf Course and Sears Point and pump stations. The impacts would be similar to those discussed under the Basic System. The impacts would be reduced to less than significant with implementation of **Mitigation Measures 3.10.1a** through **3.10.1d**.

Novato SD/NMWD

Impacts associated with construction for Novato SD under the Partially Connected System would include impacts from construction of additional pipelines as part of the Novato Urban Recycled Water Project and Sears Point area and pump stations. The impacts would be similar to those

discussed under the Basic System. The impacts would be reduced to less than significant with implementation of **Mitigation Measures 3.10.1a** through **3.10.1d**.

SVCS D

Impacts associated with construction for SVCS D under the Partially Connected System would result from construction of additional pipelines and pump stations in the Southern Sonoma Valley. The impacts would be similar to those discussed under the Basic System. The impacts would be reduced to less than significant with implementation of **Mitigation Measures 3.10.1a** through **3.10.1d**.

Under the Partially Connected System, impacts related to the Napa Salt Marsh Restoration Project would be equivalent to those under the Basic System.

Napa SD

Impacts associated with construction for Napa SD under the Partially Connected System would include impacts from construction of additional pipelines and pump stations in the Carneros East and MST areas and in the WWTP area. The impacts would be similar to those discussed under the Basic System. The impacts would be reduced to less than significant with implementation of **Mitigation Measures 3.10.1a** through **3.10.1d**.

Alternative 3: Fully Connected System (Program level)

Compared to the CEQA Baseline, the Fully Connected System would provide 153 miles of new pipeline, 5,021 HP of pumping capacity, treatment facilities providing 20.8 mgd of tertiary capacity, and 2,220 AF of storage. Compared to the No Action Alternative (NEPA Baseline), the Fully Connected System would provide 135 miles of new pipeline, 3,907 HP of pumping capacity, treatment facilities providing 20.3 mgd of tertiary capacity, and 2,155 AF of storage.

The impacts to workers from exposure to hazardous materials under the Fully Connected System would be equivalent to and greater than the impacts discussed for the Partially Connected System, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Under the Fully Connected System, additional pumping capacity would be constructed to serve the Sears Point Reuse Area. The impacts would be similar but slightly greater as compared to those discussed for LGVSD under the Partially Connected System. Implementation of **Mitigation Measures 3.10.1a** through **3.10.1d** would reduce the potential impact to a less-than-significant level.

Novato SD/NMWD

Under the Fully Connected System, an additional 2.8 miles of pipeline and additional pumping capacity would be constructed as part of the Sears Point Reuse Area. The impacts would be similar but slightly greater as compared to those discussed for Novato SD under the Partially

Connected System. Implementation of **Mitigation Measures 3.10.1a** through **3.10.1d** would reduce the potential impact to a less-than-significant level.

SVCS

Under the Fully Connected System, the NBWRP would involve construction of addition 10.5 miles of pipeline and additional pumping capacity to serve the Central Sonoma Valley Reuse Area. The impacts would be similar but slightly greater as compared to those discussed for SVCS under the Partially Connected System. Implementation of **Mitigation Measures 3.10.1a** through **3.10.1d** would reduce the potential impact to a less-than-significant level.

Under the Fully Connected System, impacts related to the Napa Salt Marsh Restoration Project would be equivalent to those under the Partially Connected System.

Napa SD

No additional project components are proposed within the Napa SD under the Fully Connected System, therefore potential impacts would be similar to those discussed under the Partially Connected System.

Mitigation Measures

Mitigation Measure 3.10.1a: Project contract specifications shall require that, in the event that evidence of potential soil contamination such as soil discoloration, noxious odors, debris, or buried storage containers, is encountered during construction, the contractor will have a contingency plan for sampling and analysis of potentially hazardous substances, including use of a photoionization detector. The required handling, storage, and disposal methods shall depend on the types and concentrations of chemicals identified in the soil. Any site investigations or remediation shall comply with applicable laws and will coordinate with the appropriate regulatory agencies,

Mitigation Measure 3.10.1b: If unknown USTs are discovered during construction, the UST, associated piping, and impacted soil shall be removed by a licensed and experienced UST removal contractor. The UST and contaminated soil shall be removed in compliance with applicable county and state requirements governing UST removal.

Mitigation Measure 3.10.1c: Prepare a project-specific Health and Safety Plan that would apply to excavation activities. The plan shall establish policies and procedures to protect workers and the public from potential hazards posed by hazardous materials. The plan shall be prepared according to federal and California OSHA regulations and submitted to the appropriate agency with jurisdiction prior to beginning site activities.

Mitigation Measure 3.10.1d: Project contract specifications shall include a Dust Abatement Program to minimize potential public health impacts associated with exposure to contaminants in soil dust.

Impact Significance with Mitigation: Less than Significant.

Impact 3.10.2: Release of Hazardous Materials During Construction. Project construction could increase the potential for accidental release of hazardous materials. (Less than Significant with Mitigation)

Construction activities would involve use of hazardous materials such as fuels, oils, solvents, and glues during construction. Inadvertent spills could occur during onsite fueling of equipment or by accident (e.g., puncture of a fuel tank through operator error or slope instability). Use of hazardous materials onsite would be required to comply with an approved Storm Water Pollution Prevention Plan (SWPPP), and implementation of best management practices (BMPs) related to fueling, vehicle washing and handling, use, and storage of chemicals would minimize any risk to either workers or the public. In addition, implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** described below would reduce this impact to a less-than-significant level.

No Project Alternative

The NBWRP would not be implemented under the No Project Alternative, therefore no impact would occur. For a discussion of the No Project under future conditions, see No Action Alternative below.

No Action Alternative

Under the No Action Alternative, which includes consideration of future conditions, it is likely that a subset of water recycling projects would be implemented by the Member Agencies on an individual basis, without the benefit of regional coordination or federal funding. Future baseline conditions (2020) for release of hazardous materials are assumed to be equivalent to current conditions.

For comparison to the Action Alternatives, it is estimated that approximately 17.5 miles of new pipeline, 912 HP of pumping capacity, treatment facilities providing 0.5 mgd of tertiary capacity, and approximately 65 AF of storage would be constructed by Member Agencies on an individual basis (see **Chart 3.10-1, No Action**). A discussion of individual Member Agencies is provided below.

LGVS/NMWD

There would be no project facilities constructed under the No Action Alternative, therefore no impact from accidental release of hazardous materials during construction would occur.

Novato SD/NMWD

Please refer to the discussion above for the impacts that would occur in the Novato SD service area. There is a greater potential for accidental releases of hazardous materials used during construction under No Action Alternative as compared to existing conditions. This could be a significant impact. Therefore, implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** would reduce the impact to a less-than-significant level.

SVCS D

Please refer to the discussion above for the impacts that would occur in the SVCS D service area. There is a greater potential for accidental releases of hazardous materials used during construction under No Action Alternative as compared to existing conditions, which could be a significant impact. Therefore, implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** would reduce the impact to a less-than-significant level.

Napa SD

There would be no project facilities constructed under the No Action Alternative, therefore no impact from accidental release of hazardous materials during construction would occur.

Phase 1 (Project level)

Compared to the CEQA Baseline, Phase 1 projects would provide 46 miles of new pipeline, 1,655 HP of pumping capacity, treatment facilities providing 6.4 mgd of tertiary capacity, and 65 AF of storage. Compared to the No Action Alternative (NEPA Baseline), Phase 1 projects would provide 28 miles of new pipeline, 743 HP of pumping capacity, treatment facilities providing 5.9 mgd of tertiary capacity, and no additional storage.

The potential for accidental release of hazardous materials during construction of the proposed facilities under Phase 1 would be equivalent to and greater than the impacts discussed for the No Action Alternative, in proportion to the facilities constructed under this alternative. Under the Phase 1 Implementation Plan, construction of pipelines, pump stations, water storage facilities, and WWTP upgrades would occur. Compared to existing conditions, there is increased potential for impacts from accidental release of hazardous materials used during construction. The construction activities would require the use of hazardous materials, including fuels, oils, solvents, and glues. Accidental releases of these hazardous materials could occur. The impact would be minimized by implementation of **Mitigation Measures 3.10.2a** through **3.10.2d**. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Under Phase 1, LGVSD would construct additional pipeline, 72 horsepower (hp) pumping capacity, and 0.3 million gallons per day (mgd) in tertiary treatment capacity. The impacts discussed above in the Phase 1 summary would apply to the projects in the LGVSD service area.

Novato SD/NMWD

Under Phase 1, Novato SD would construct additional 9.8 miles of pipelines, 259 hp of pumping, and 1.2 mgd in tertiary treatment capacity. The impacts discussed above in the Phase 1 summary would apply to the projects in the Novato SD service area.

SVCS D

Impacts related to the SVRWP pipeline alignment and the Napa Salt Marsh Restoration Project would be equivalent to those under the No Action Alternative.

Napa SD

Under Phase 1, Napa SD would construct an additional 17.5 miles of pipelines, 880 hp in pumping capacity, and 2.4 mgd in tertiary treatment capacity. Please refer to the discussion above for the impacts that would occur in the Napa SD service area. There is a greater potential for accidental releases of hazardous materials used during construction under Phase 1 as compared to No Action Alternative conditions, which could be a significant impact. Therefore, implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** would reduce the impact to a less-than-significant level.

Alternative 1: Basic System (Program level)

Compared to the CEQA Baseline, the Basic System projects would provide 83 miles of new pipeline, 2,158 HP of pumping capacity, treatment facilities providing 7.8 mgd of tertiary capacity, and 1,020 AF of storage. Compared to the No Action Alternative (NEPA Baseline), Basic System would provide 65 miles of new pipeline, 1,246 HP of pumping capacity, treatment facilities providing 7.3 mgd of tertiary capacity, and 955 AF of storage.

The potential for accidental release of hazardous materials during construction of the proposed facilities under the Basic System would be equivalent to and greater than the impacts discussed for Phase 1, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

As no additional facilities are proposed within the LGVSD under the Basic System, impacts associated with accidental releases of hazardous materials during construction are expected to be the same as under Phase 1 (i.e., mitigated to less-than-significant levels by implementation of **Mitigation Measures 3.10.2a** through **3.10.2d**).

Novato SD/NMWD

Additional components would be constructed within the Novato SD service area under the Basic System as compared to Phase 1. Therefore, although the impacts would be similar to those discussed under Phase 1, the impacts associated with the Basic System would be greater and could have a significant impact. Implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** would minimize the impact in the Novato SD service area.

SVCS

Additional components would be constructed within the SVCS service area under the Basic System as compared to Phase 1. Although the impacts would be similar to those discussed under Phase 1, the impacts associated with the Basic System would be greater could have a significant impact. Implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** would minimize the impact in the SVCS service area.

Napa SD

Additional components would be constructed within the Napa SD service area under the Basic System as compared to Phase 1. Although the impacts would be similar to those discussed under Phase 1, the impacts associated with the Basic System would be greater could have a significant impact. Implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** would minimize the impact in the Napa SD service area.

Alternative 2: Partially Connected System (Program level)

Compared to the CEQA Baseline, the Partially Connected System would provide 139 miles of new pipeline, 3,454 HP of pumping capacity, treatment facilities providing 15.9 mgd of tertiary capacity, and 2,220 AF of storage. Compared to the No Action Alternative (NEPA Baseline), the Partially Connected System would provide 122 miles of new pipeline, 2,542 HP of pumping capacity, treatment facilities providing 15.4 mgd of tertiary capacity, and 2,155 AF of storage.

The potential for accidental release of hazardous materials during construction of the proposed facilities under the Partially Connected System would be equivalent to and greater than the impacts discussed for the Basic System, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Under the Partially Connected System, additional pipelines, pumping capacity, and treatment capacity would be constructed within the LGVSD service area as compared to the Basic System. Therefore, there is increased potential for impacts associated with accidental releases of hazardous materials during construction. However, the nature of the impact would be similar to those discussed under the Basic System. Please see discussion above.

Novato SD/NMWD

Under the Partially Connected System, additional pipelines, pumping capacity, and treatment capacity would be constructed within the Novato SD service area as compared to the Basic System. Therefore, there is increased potential for impacts associated with accidental releases of hazardous materials during construction. However, the nature of the impact would be similar to those discussed under the Basic System. Please see discussion above.

SVCS

Under the Partially Connected System, additional pipelines and pumping capacity would be constructed within the SVCS service area as compared to the Basic System. Therefore, there is increased potential for impacts associated with accidental releases of hazardous materials during construction. However, the nature of the impact would be similar to those discussed under the Basic System. Please see discussion above.

Napa SD

Under the Partially Connected System, additional pipelines, pumping capacity, and treatment capacity would be constructed within the Napa SD service area as compared to the Basic System.

Therefore, there is increased potential for impacts associated with accidental releases of hazardous materials during construction. However, the nature of the impact would be similar to those discussed under the Basic System. Please see discussion above.

Alternative 3: Fully Connected System (Program level)

Compared to the CEQA Baseline, the Fully Connected System would provide 153 miles of new pipeline, 5,021 HP of pumping capacity, treatment facilities providing 20.8 mgd of tertiary capacity, and 2,220 AF of storage. Compared to the No Action Alternative (NEPA Baseline), the Fully Connected System would provide 135 miles of new pipeline, 3,907 HP of pumping capacity, treatment facilities providing 20.3 mgd of tertiary capacity, and 2,155 AF of storage.

The potential for accidental release of hazardous materials under the Fully Connected System would be equivalent to and greater than the impacts discussed for the Partially Connected System, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Under the Fully Connected System, additional pumping capacity would be constructed within the LGVSD service area as compared to the Partially Connected System. Therefore, there is increased potential for impacts associated with accidental releases of hazardous materials during construction, and mitigation measures. However implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** would reduce the impact to less-than-significant level.

Novato SD/NMWD

Under the Fully Connected System, additional pipelines, pumping capacity, and treatment capacity would be constructed within the Novato SD service area under the Fully Connected System. Therefore, there is increased potential for impacts associated with accidental releases of hazardous materials during construction, and mitigation measures; however implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** would reduce the impact to less-than-significant level.

SVCSD

Under the Fully Connected System, additional pipelines and pumping capacity would be constructed within the SVCSD service area under the Fully Connected System. Therefore, there is increased potential for impacts associated with accidental releases of hazardous materials during construction. However, implementation of **Mitigation Measures 3.10.2a** through **3.10.2d** would reduce the impact to less-than-significant level.

Napa SD. No additional facilities are proposed within the Napa SD service area under the Fully Connected System. Therefore, potential impacts from accidental releases of hazardous materials during construction would be the same as under the Partially Connected System.

Mitigation Measures

Mitigation Measure 3.10.2a: Consistent with the SWPPP requirements, the construction contractor shall be required to implement BMPs for handling hazardous materials onsite. The use of construction BMPs will minimize any adverse effects on groundwater and soils, and will include, but not limited to, the following:

- Follow manufacturers' recommendations and regulatory requirements for use, storage, and disposal of chemical products and hazardous materials used in construction;
- Spill control and countermeasures, including employee spill prevention/response training;
- Avoid overtopping construction equipment fuel gas tanks;
- During routine maintenance of construction equipment, properly contain and remove grease and oils; and
- Properly dispose of discarded containers of fuels and other chemicals.

Mitigation Measure 3.10.2b: The contractor shall follow the provisions of California Code of Regulations, Title 8, Sections 5163 through 5167 for General Industry Safety Orders to protect the action area from being contaminated by the accidental release of any hazardous materials and/or wastes. The local CUPA agency will be contacted for any site-specific requirements regarding hazardous materials or hazardous waste containment or handling.

Mitigation Measure 3.10.2c: Oil and other solvents used during maintenance of construction equipment shall be recycled or disposed of in accordance with applicable regulatory requirements. All hazardous materials shall be transported handled, and disposed of in accordance with applicable regulatory requirements.

Mitigation Measure 3.10.2d: In the event of an accidental release of hazardous materials during construction, containment and clean up shall occur in accordance with applicable regulatory requirements.

Impact Significance With Mitigation: Less than Significant.

Impact 3.10.3: Release of Hazardous Materials During Long-term Operation. Project operation could increase the potential for accidental release of hazardous materials. (Less than Significant)

Project implementation would involve the storage and use of chemicals such as coagulants or flocculants and disinfection agents (e.g., polymers, alum, and sodium bisulfite) associated with the treatment upgrades and oil and lubricants at the proposed pump stations. Accidental release of the stored chemicals during use or storage could adversely affect the environment and/or the public. However, the chemicals that would be handled during project operation are not considered

acutely hazardous by the USEPA (40 CFR Part 355 Section 302 and 304). The chemicals would be stored in aboveground storage tanks with secondary containment, in accordance with federal, state, and local requirements and precautions would be taken to prevent and control any spills that may occur. The Member Agencies would comply with the provisions of California Code of Regulations, Title 8, Sections 5163 through 5167 for General Industry Safety Orders to protect the action area from being contaminated by the accidental release of any hazardous materials and/or wastes. The Member Agencies would contact the CUPA, local fire agency and the County Department of Public Health, Environmental Health Division for any site-specific requirements regarding hazardous materials or hazardous waste containment or handling. Disposal of all hazardous materials would be in compliance with the applicable California hazardous waste disposal regulations. The Member Agencies would prepare or update their existing Hazardous Materials Business Plans and/or Emergency Response Plan to include any new chemicals that would be handled during project operation. Regulatory compliance and hazardous materials management practices would ensure a less than significant impact. Project operation would continue to take place in a controlled, industrial environment, and accidental exposure to hazardous materials would be minimized by compliance with applicable laws and regulations. There would be no new chemical storage or use associated with pipelines, therefore it is not discussed further.

No Project Alternative

The NBWRP would not be implemented under the No Project Alternative, therefore no impact would occur. For a discussion of the No Project under future conditions, see No Action Alternative below.

No Action Alternative

Under the No Action Alternative, which includes consideration of future conditions, it is likely that a subset of water recycling projects would be implemented by the Member Agencies on an individual basis, without the benefit of regional coordination or federal funding. Future baseline conditions (2020) for release of hazardous materials are assumed to be equivalent to current conditions.

For comparison to the Action Alternatives, it is estimated that approximately 17.5 miles of new pipeline, 912 HP of pumping capacity, treatment facilities providing 0.5 mgd of tertiary capacity, and approximately 65 AF of storage would be constructed by Member Agencies on an individual basis (see **Chart 3.10-1, No Action**). A discussion of individual Member Agencies is provided below.

LGVSD/NMWD

There would be no project facilities constructed under the No Action Alternative, therefore no impact would occur.

Novato SD/NMWD

There would be no additional impacts as compared to those discussed above.

SVCS

There would be no additional impacts as compared to those discussed above.

Napa SD

There would be no project facilities constructed under the No Action Alternative, therefore no impact would occur.

Phase 1 (Project level)

Compared to the CEQA Baseline, Phase 1 projects would provide 46 miles of new pipeline, 1,655 HP of pumping capacity, treatment facilities providing 6.4 mgd of tertiary capacity, and 65 AF of storage. Compared to the No Action Alternative (NEPA Baseline), Phase 1 projects would provide 28 miles of new pipeline, 743 HP of pumping capacity, treatment facilities providing 5.9 mgd of tertiary capacity, and no additional storage.

The impacts associated with the release of hazardous materials during long-term operation of the proposed facilities under Phase 1 would be equivalent to and greater than the impacts discussed for the No Action Alternative, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Under Phase 1, the use and storage of chemicals during project operation would be slightly greater than that under No Action Alternative for LGVSD. The chemicals would be associated with the storage tanks and the treatment upgrades at the WWTP. However, the impact would be similar to that discussed under the general description above and would be less than significant.

Novato SD/NMWD

Under Phase 1, the impact associated with hazardous materials storage and use for Novato SD would be slightly greater than that discussed under No Action Alternative and similar to that discussed for LGVSD (under Phase 1). The impact would be less than significant.

SVCS

Under Phase 1, the NBWRP would involve use of Aquashade dye for algae control at the SVCS storage reservoirs, and petroleum fuel would be used to run the distribution pump stations (ESA, 2006). Regulatory compliance and standard practices to control any accidental release (discussed under LGVSD) would ensure a less-than-significant impact. The impact would be similar to that discussed above and would be less than significant. Under Phase 1, impacts related to the Napa Salt Marsh Restoration Project would be equivalent to those under the No Action Alternative.

Napa SD

Under Phase 1, the impact associated with hazardous materials storage and use for Napa SD would be slightly greater than that discussed under No Action Alternative. Chemical use would be associated with treatment upgrades and would be similar to that discussed for Novato SD

above (under Phase 1). Regulatory compliance and standard practices to control any accidental release (discussed above) would ensure a less-than-significant impact.

Alternative 1: Basic System (Program level)

Compared to the CEQA Baseline, the Basic System projects would provide 83 miles of new pipeline, 2,158 HP of pumping capacity, treatment facilities providing 7.8 mgd of tertiary capacity, and 1,020 AF of storage. Compared to the No Action Alternative (NEPA Baseline), Basic System would provide 65 miles of new pipeline, 1,246 HP of pumping capacity, treatment facilities providing 7.3 mgd of tertiary capacity, and 955 AF of storage.

The impacts associated with the release of hazardous materials during long-term operation of the proposed facilities under the Basic System would be equivalent to and greater than the impacts discussed for Phase 1, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

As no additional pump stations or storage are proposed within the LGVSD service area under the Basic System, the impacts would be similar to those discussed under Phase 1.

Novato SD/NMWD

Please refer to the discussion under LGVSD.

SVCS

Under the Basic System, the chemical use could be slightly higher due to the operation of the additional pump stations and storage facilities. However, the impact would be similar to that discussed above.

Napa SD

Please refer to the discussion under SVCS.

Alternative 2: Partially Connected System (Program level)

Compared to the CEQA Baseline, the Partially Connected System would provide 139 miles of new pipeline, 3,454 HP of pumping capacity, treatment facilities providing 15.9 mgd of tertiary capacity, and 2,220 AF of storage. Compared to the No Action Alternative (NEPA Baseline), the Partially Connected System would provide 122 miles of new pipeline, 2,542 HP of pumping capacity, treatment facilities providing 15.4 mgd of tertiary capacity, and 2,155 AF of storage.

The impacts associated with the release of hazardous materials during long-term operation of the proposed facilities under the Partially Connected System would be equivalent to and greater than the impacts discussed for the Basic System, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Under the Partially Connected System, additional pump stations and storage facilities would be constructed within the LGVSD service area as compared to the Basic System. Potential impacts from accidental releases of hazardous materials during operation would be equivalent to the impacts discussed above.

Novato SD/NMWD

Under the Partially Connected System, additional treatment upgrades, pump stations and storage would be constructed within the Novato SD service area as compared to the Basic System. Potential impacts from accidental releases of hazardous materials during operation of facilities would be equivalent to the impacts discussed above.

SVCS

Under the Partially Connected System, additional pump stations and storage would be constructed within the SVCS service area as compared to the Basic System. Please refer to the discussion above. Under the Partially Connected System, impacts related to the Napa Salt Marsh Restoration Project would be equivalent to those under the No Action Alternative.

Napa SD

Under the Partially Connected System, additional pump stations and storage would be constructed within the Napa SD service area as compared to the Basic System. Please refer to the discussion above.

Alternative 3: Fully Connected System (Program level)

Compared to the CEQA Baseline, the Fully Connected System would provide 153 miles of new pipeline, 5,021 HP of pumping capacity, treatment facilities providing 20.8 mgd of tertiary capacity, and 2,220 AF of storage. Compared to the No Action Alternative (NEPA Baseline), the Fully Connected System would provide 135 miles of new pipeline, 3,907 HP of pumping capacity, treatment facilities providing 20.3 mgd of tertiary capacity, and 2,155 AF of storage.

The impacts associated with the release of hazardous materials during long-term facility operation under the Fully Connected System would be equivalent to and greater than the impacts discussed for the Partially Connected System, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Under the Fully Connected System, the chemical use would be associated with the additional pump stations and slightly greater than that discussed under Phase 1. The impact would be similar to that discussed under Phase 1.

Novato SD/NMWD

Additional pumping capacity and storage are proposed within the Novato SD service area under the Fully Connected System. Please refer to the discussion under LGVSD.

SVCS

Additional pumping capacity would be constructed within the SVCS service area under the Fully Connected System. Please refer to the discussion under LGVSD. Under the Fully Connected System, impacts related to the Napa Salt Marsh Restoration Project would be equivalent to those under the No Action Alternative.

Napa SD

No additional pump capacity or storage is proposed within the Napa SD service area under the Fully Connected System. No impact is expected for Napa SD.

Impact 3.10.4: Wildland Fire Hazard. Construction activities in grassland areas could have the potential to expose people or equipment to risk of loss, injury, or death involving wildland fires. (Less than Significant with Mitigation)

Portions of the NBWRP are located in rural and agricultural land that may be susceptible to wildland fires. As discussed in the Setting, NBWRP would be mostly located outside the areas that are prone to wildland fires in the SVCS and Napa SD service areas. In the case of the proposed components that would lie within areas with a wildland fire hazard (such as in the LGVSD and Novato SD service areas), construction activities could expose people or equipment to risk of loss, injury, or death involving wildland fires. Compliance with the local plans to reduce fire hazards would be required. In addition, implementation of Mitigation Measures, as described below, would reduce impacts to less-than-significant levels.

No Project Alternative

The NBWRP would not be implemented under the No Project Alternative, therefore no impact would occur. For a discussion of the No Project under future conditions, see No Action Alternative below.

No Action Alternative

Under the No Action Alternative, which includes consideration of future conditions, it is likely that a subset of water recycling projects would be implemented by the Member Agencies on an individual basis, without the benefit of regional coordination or federal funding. Future baseline conditions (2020) for wildland fire hazard are assumed to be equivalent to current conditions.

For comparison to the Action Alternatives, it is estimated that approximately 17.5 miles of new pipeline, 912 HP of pumping capacity, treatment facilities providing 0.5 mgd of tertiary capacity, and approximately 65 AF of storage would be constructed by Member Agencies on an individual basis (see **Chart 3.10-1, No Action**). A discussion of individual Member Agencies is provided below.

LGVSD/NMWD

There would be no project facilities constructed under the No Action Alternative, therefore no impact would occur.

Novato SD/NMWD

Under the No Action Alternative, project facilities would be constructed only within the North Service Area. As such, there is increased potential for a wildland fire hazard, which could be a significant impact when compared to the existing conditions. Implementation of **Mitigation Measures 3.10.4a** and **3.10.4b** described below would reduce this impact to a less-than-significant level.

SVCS

Alignment 1A of the Sonoma Valley Recycled Water Project, as well as one of three alternatives for the Napa Salt Marsh Restoration Project would be constructed under the No Action Alternative. As compared to existing conditions, there is increased potential for a wildland fire hazard, which could be a significant impact. Implementation of **Mitigation Measures 3.10.4a** and **3.10.4b** described below would reduce this impact to a less-than-significant level.

Napa SD

The project components would be located outside the wildland fire hazard areas. No impact is expected.

Phase 1 (Project level)

Compared to the CEQA Baseline, Phase 1 projects would provide 46 miles of new pipeline, 1,655 HP of pumping capacity, treatment facilities providing 6.4 mgd of tertiary capacity, and 65 AF of storage. Compared to the No Action Alternative (NEPA Baseline), Phase 1 projects would provide 28 miles of new pipeline, 743 HP of pumping capacity, treatment facilities providing 5.9 mgd of tertiary capacity, and no additional storage.

The wildland fire hazards to proposed facilities under Phase 1 would be equivalent to and greater than the impacts discussed for the No Action Alternative, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Under Phase 1, LGVSD would upgrade tertiary treatment capacity at the LGVSD WWTP and construct a new booster pump station; NMWD would install one of three pipeline options, described in **Chapter 2, Project Description**, which would connect the LGVSD WWT Recycled Water Treatment Facility to facilities constructed by NMWD. Under Phase 1, the proposed pipeline route for the Coast Guard Housing Distribution Loop is located predominantly along existing roadways. The pipeline routes for Options A, B, and C are proposed primarily through open, undeveloped grazing land. The new pump station would be located at the existing LGVSD WWTP. There is greater potential for impacts from wildfire hazards in rural and open space areas located along the pipeline option corridors, which could be a significant impact. Therefore,

Mitigation Measures 3.10.4a and **3.10.4b** would be required to reduce the level of impact to less-than-significant.

Novato SD/NMWD

The impact would be similar to that discussed under LGVSD. Refer to discussion above.

SVCS

The additional proposed components would not be located within areas that are prone to wildland fires. No additional impact is expected.

Napa SD

The proposed components would not be located within areas that are prone to wildland fires. No impact is expected.

Alternative 1: Basic System (Program level)

Compared to the CEQA Baseline, the Basic System projects would provide 83 miles of new pipeline, 2,158 HP of pumping capacity, treatment facilities providing 7.8 mgd of tertiary capacity, and 1,020 AF of storage. Compared to the No Action Alternative (NEPA Baseline), Basic System would provide 65 miles of new pipeline, 1,246 HP of pumping capacity, treatment facilities providing 7.3 mgd of tertiary capacity, and 955 AF of storage.

The wildland fire hazards to proposed facilities under the Basic System would be equivalent to and greater than the impacts discussed for Phase 1, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

No additional pipelines or pump stations are proposed within the LGVSD service area under the Basic System, so impacts would be the same as under Phase 1.

Novato SD/NMWD

Additional new pipelines would be constructed in the Novato SD service area under the Basic System. Construction activities along the proposed pipeline corridor in rural and open space areas could expose public or workers to wildfire hazards, which could be a significant impact. Implementation of located along the, **Mitigation Measures 3.10.4a** and **3.10.4b** would reduce the level of impact to less-than-significant.

SVCS

The additional proposed components would not be located within areas that are prone to wildland fires. No additional impact is expected.

Napa SD

The proposed components would not be located within areas that are prone to wildland fires. No impact is expected.

Alternative 2: Partially Connected System (Program level)

Compared to the CEQA Baseline, the Partially Connected System would provide 139 miles of new pipeline, 3,454 HP of pumping capacity, treatment facilities providing 15.9 mgd of tertiary capacity, and 2,220 AF of storage. Compared to the No Action Alternative (NEPA Baseline), the Partially Connected System would provide 122 miles of new pipeline, 2,542 HP of pumping capacity, treatment facilities providing 15.4 mgd of tertiary capacity, and 2,155 AF of storage.

The wildland fire hazards to proposed facilities under the Partially Connected System would be equivalent to and greater than the impacts discussed for the Basic System, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Under the Partially Connected System, additional pipelines and pump stations would be constructed in areas that may be prone to wildfires. The impact would be similar to but slightly greater than the impact discussed under the Basic System. Implementation of **Mitigation Measures 3.10.4a** and **3.10.4b** during construction of the Partially Connected System would reduce the impact to a less-than-significant level.

Novato SD/NMWD

Under the Partially Connected System, additional pipelines and pump stations would be constructed in areas that may be prone to wildfires. Please refer to discussion under LGVSD.

SVCS

The additional proposed components would not be located within areas that are prone to wildland fires. No impact is expected.

Napa SD

The proposed components would not be located within areas that are prone to wildland fires. No impact is expected.

Alternative 3: Fully Connected System (Program level)

Compared to the CEQA Baseline, the Fully Connected System would provide 153 miles of new pipeline, 5,021 HP of pumping capacity, treatment facilities providing 20.8 mgd of tertiary capacity, and 2,220 AF of storage. Compared to the No Action Alternative (NEPA Baseline), the Fully Connected System would provide 135 miles of new pipeline, 3,907 HP of pumping capacity, treatment facilities providing 20.3 mgd of tertiary capacity, and 2,155 AF of storage.

The wildland fire hazards under the Fully Connected System would be equivalent to and greater than the impacts discussed for the Partially Connected System, in proportion to the facilities constructed under this alternative. A discussion of impacts by Member Agency is provided below.

LGVSD/NMWD

Additional pump stations would be constructed in the LGVSD service area under the Fully Connected System. The impact would be similar but slightly greater than that discussed under the Partially Connected System. Implementation of **Mitigation Measures 3.10.4a** and **3.10.4b** during construction of the Fully Connected System would reduce the impact to a less-than-significant level.

Novato SD/NMWD

Additional pipelines and pumping capacity would be constructed in the Novato SD service area, under the Fully Connected System. The impact would be similar but slightly greater than that discussed under the Partially Connected System. Implementation of **Mitigation Measures 3.10.4a** and **3.10.4b** during construction of the Fully Connected System would reduce the impact to a less-than-significant level.

SVCS

The additional proposed components would not be located within areas that are prone to wildland fires. No additional impact is expected.

Napa SD

The proposed components would not be located within areas that are prone to wildland fires. No impact is expected.

Mitigation Measures

Mitigation Measure 3.10.4a: For applicable Member Agencies, in consultation with local fire agencies, a Fire Safety Plan will be developed for each of the service areas associated with the project. The Fire Safety Plan(s) will describe various potential scenarios and action plans in the event of a fire.

Mitigation Measure 3.10.4b: For applicable Member Agencies, during project construction, all staging areas, welding areas, or areas slated for development using spark-producing equipment will be cleared of dried vegetation or other material that could ignite. Any construction equipment that includes a spark arrestor shall be equipped with a spark arrestor in good working order. All vehicles and crews working at the project site(s) will have access to functional fire extinguishers at all times. In addition, construction crews will be required to have a spotter during welding activities to look out for potentially dangerous situations, including accidental sparks.

Impact Significance with Mitigation: Less than Significant

3.10.4 Impact Summary by Service Area

Table 3.10-6 provides a summary of potential project impacts related to hazardous materials.

**TABLE 3.10-6
POTENTIAL IMPACTS AND SIGNIFICANCE – HAZARDS AND HAZARDOUS MATERIALS**

Proposed Action	Impact by Member Agency Service Areas			
	LGVSD/ NMWD	Novato SD/ NMWD	SVCS	Napa SD/ Napa County
Impact 3.10.1: Exposure to Hazardous Materials During Construction				
No Project Alternative	NI	NI	NI	NI
No Action Alternative	NI	LSM	LSM	NI
Phase 1	LSM	LSM	LSM	LSM
Alternative 1	LSM	LSM	LSM	LSM
Alternative 2	LSM	LSM	LSM	LSM
Alternative 3	LSM	LSM	LSM	LSM
Impact 3.10.2: Accidental Release of Hazardous Materials During Construction				
No Project Alternative	NI	NI	NI	NI
No Action Alternative	NI	LSM	LSM	NI
Phase 1	LSM	LSM	LSM	LSM
Alternative 1	LSM	LSM	LSM	LSM
Alternative 2	LSM	LSM	LSM	LSM
Alternative 3	LSM	LSM	LSM	LSM
Impact 3.10.3: Accidental Release of Hazardous Materials During Long-term Operation				
No Project Alternative	NI	NI	NI	NI
No Action Alternative	NI	NI	NI	NI
Phase 1	LTS	LTS	LTS	LTS
Alternative 1	LTS	LTS	LTS	LTS
Alternative 2	LTS	LTS	LTS	LTS
Alternative 3	LTS	LTS	LTS	LTS
Impact 3.10.4: Wildland Fire Hazard				
No Project Alternative	NI	NI	NI	NI
No Action Alternative	NI	LSM	LSM	NI
Phase 1	LSM	LSM	LSM	NI
Alternative 1	LSM	LSM	LSM	NI
Alternative 2	LSM	LSM	LSM	NI
Alternative 3	LSM	LSM	LSM	NI

NI = No Impact
 LTS = Less than Significant impact, no mitigation required
 LSM = Less than Significant with Mitigation

3.10.5 References

- Camp Dresser & McKee (CDM), U.S. Bureau of Reclamation and Sonoma County Water Agency *Phase 3 Engineering and Economic/ Financial Analysis Report for the North San Pablo Bay Restoration and Reuse Project*, June 2008.
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- City of San Rafael, Community Development Department, *2020 General Plan*, 2004.
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- County of Marin, Marin County Community Development Agency. *Marin Countywide Plan*, 2007.
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- Novato Fire Protection District, Wildland Area Map, 2008, <http://www.xmrfire.org/nov/Shared%20Documents/UWI%20Novato%20Map.pdf>.

