

## C.9 Hazards and Hazardous Materials

This section analyzes whether the Revised Project and PG&E Upgrades result in any new significant impacts from hazards or hazardous materials that were not previously identified and disclosed in the 2010 Final EIR, or whether there has been a substantial increase in the severity of any previously identified impacts. As part of this analysis, the section considers changes to the environment related to hazards, and changes to potential impacts and mitigation measures.

Data sources that were used for this analysis include information on Valley Fever from the Center for Disease Control, the Public Broadcasting System, and the Los Angeles Times (CDC, 2014; PBS, 2013; LA Times, 2013), and data on the location of leaking underground storage tanks from the State Water Resources Control Board (SWRCB, 2014).

### C.9.1 Environmental Setting

The following section describes changes to the environmental setting that have occurred since 2010. Section C.9.1.1 describes any changes to the environmental setting that was presented in the 2010 Final EIR. Section C.9.1.2 describes the environmental setting for the area surrounding the PG&E transmission system upgrades.

#### C.9.1.1 Revised Solar Project

The hazards and hazardous materials environmental setting for the Revised Project has remained substantially unchanged since approval of the 2010 Final EIR. Panoche Valley remains generally undeveloped and pastoral in character. No new development has occurred, and no major new structures have been built in the valley. Grazing remains the primary land use in the area. No new sensitive receptors have been identified within one mile of the project site. No new hazardous materials sites have been identified within one mile of the project area. The environmental setting for most other hazards remains unchanged.

**Valley Fever.** As with the Approved Project, construction of the Revised Project would occur in an area favorable to the growth of the “Valley Fever” vector, which is the fungus *Coccidioides immitis*. This fungus grows in soils in areas of low rainfall, high summer temperatures, and moderate winter temperatures. Project construction would disturb the soil and cause the fungal spores to become airborne, potentially putting construction personnel and wildlife at risk of contracting Valley Fever. Although most Valley Fever cases are very mild, and more than half of infected people either have no symptoms or experience flu-like symptoms and never seek medical attention, in extreme cases the disease can be fatal.

While the presence of Valley Fever spores in the Panoche Valley has not changed since 2010, there has been an increase in Valley Fever cases in recent years. Construction of two similar solar projects, the California Valley Solar Ranch (250 MW) and Topaz Solar Farm (550 MW) in the Carrizo Plain of San Luis Obispo, resulted in 28 workers being infected with Valley Fever (LA Times, 2013). The California Department of Industrial Relations (Cal OSHA) identified 21 violations of State law regarding worker protection violations for the construction of these two solar projects.<sup>1</sup>

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<sup>1</sup> According to subsequently issued Cal OSHA citations issued to the contractors or developers at the San Luis Obispo County solar projects, Cal OSHA inspections revealed that proper engineering (watering and soil stabilization) and administrative controls (work stoppage during high wind conditions) were not being implemented

Due to the rise in Valley Fever cases in the western United States over the past few years, the Centers for Disease Control call this disease “A Silent Epidemic” (CDC, 2014). Valley Fever cases in endemic areas have been rising: cases have increased from 2,265 in 1998 to 22,401 in 2011. Since 1990, more than 3,000 people have died (PBS, 2013) and almost half of them have been in California (LA Times, 2013).

### **C.9.1.2 PG&E Upgrades**

The PG&E Upgrades associated with the Revised Project include installation of approximately 17 miles of optical ground wire (OPGW) primarily on existing transmission towers between the Panoche Valley Solar Project site and the existing Panoche Substation in Fresno County. The telecommunications system upgrades also include construction of up to three new microwave communication towers and upgrades to an existing microwave tower. The PG&E transmission system upgrades would include eight new transmission structures that are required to tie the existing Moss Landing–Panoche 230 kV transmission line into the proposed PG&E switchyard, located within the Revised Project site boundaries. The new transmission structures would be installed by PG&E after site preparation is completed by the Applicant. The environmental setting for these upgrades includes the area surrounding the Moss Landing–Panoche 230 kV transmission line between the project site and the Panoche Substation, the Call Mountains (west of the Panoche Valley), Panoche Mountain (east of the Panoche Valley), and the area surrounding the Helm Substation (approximately 13 miles southwest of the City of Fresno).

Disease vectors are similar to those discussed in the 2010 Final EIR and the exposure to sensitive receptors remains low with less than 10 potential occupied residences with 1000 feet of the PG&E ROW. There is one documented leaking underground storage tank site currently undergoing remediation near the Chevron Firebaugh north of Panoche Road and west of Interstate 5 (SWRCB, 2014). This location is approximately 500 feet northwest of a proposed pulling site. There are no other known releases of hazardous substances along the approximately 17 miles of ROW where OPGW will be installed or at the proposed microwave tower sites. The wildfire risk varies along the 17 miles of ROW and at the microwave sites. The response times to remote locations along the PG&E Telecommunication Upgrades would vary from ten minutes to two hours via overland travel.

There are no hospitals, schools, or libraries within one mile of the PG&E ROW or microwave communication tower sites. The Panoche Elementary School is located over one mile away from the PG&E ROW.

Seven residences have been identified within one mile of the PG&E ROW within San Benito County. All seven residences are located south of the existing Moss Landing–Panoche 230 kV transmission line. Five of these residences are located along or just off of Panoche Road in the eastern portion of the Panoche Valley. Two of these residences are located towards the center of Panoche Valley, southeast of the proposed new Panoche Valley Solar Project microwave communication tower.

Through a visual review of aerial imagery, two possible residences have been identified within one mile of the PG&E ROW within Fresno County. One possible residence (APN 02706056S) is located adjacent to the PG&E ROW boundary, less than 500 feet northwest of the Panoche Substation. The second possible residence (APN02711001S) is located approximately 400 feet north of the centerline of the PG&E ROW near the southwest corner of the intersection of W Panoche Road and Panoche Road.

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to control dust in accordance with applicable regulations. (See Section C.9.1.2, which references pertinent regulations).

## C.9.2 Applicable Regulations, Plans, and Standards

No changes have occurred to the regulatory setting for hazards and hazardous materials since 2010. However, based on the new information relating to recent cases of Valley Fever relating to the California Valley Solar Ranch Project, it is important to note that the California Department of Industrial Labor has established strict regulations with regard to protection of construction workers who may be exposed to Valley Fever on construction sites. These regulations can be found in the following sections of Title 8 of the California Code of Regulations, and including contractor reporting obligations in the event of worker injury and illness:

- Section 342 (Reporting Work-Connected Serious Illnesses or Injuries)
- Section 3203 (Injury and Illness Prevention Programs)
- Section 5141 (Implementation of Engineering and Administrative Controls to Prevent Harmful Exposure)
- Section 5144 (Respiratory Protection When Effective Engineering Controls Are Not Feasible)

Any violation of these sections can lead to a potential civil penalty action against the contractor or employer pursuant to California Labor Code section 6317.

## C.9.3 Environmental Impacts and Mitigation Measures

This section addresses whether changes to the Approved Project would result in any new significant hazards impacts or increase the severity of previously identified hazards impacts. Section C.9.3.1 restates the significance criteria used in 2010 to determine whether any project changes result in any new or more severe significant impacts. Section C.9.3.2 summarizes the impacts and mitigation measures presented in the 2010 Final EIR for ease of reference. Section C.9.3.3 presents the updated impact analysis for the Revised Project, and Section C.9.3.4 addresses changes to two adopted mitigation measures and three APMs. Section C.9.3.5 addresses the environmental impacts that would occur as a result of the PG&E transmission system upgrades, and Section C.9.3.6 describes cumulative impacts.

### C.9.3.1 Significance Criteria

The following significance criteria for hazards and hazardous materials were derived from the Environmental Checklist in CEQA Appendix G. These significance criteria were used for the 2010 Final EIR and are also applied to this Supplemental EIR. They have been amended or supplemented, as appropriate, to address the nature of solar photovoltaic facilities and transmission line upgrades in general, and the full range of potential impacts related to this Revised Project in particular. An impact of the Revised Project and PG&E Upgrades would be considered significant and would require mitigation if it would:

- Create a substantial hazard to people or the environment through the routine transport, use, or disposal of hazardous materials or as a result of an accidental release of hazardous materials.
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- Create a substantial hazard to people or the environment as a result of being located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

- Create a substantial aeronautical or motor vehicle hazard or result in a significant aerial obstruction within 2 miles of an airport or airstrip.
- Expose people or structures to a risk of loss, injury, or death involving wildland fires.
- Impair implementation of, or physically with, an adopted emergency response plan or emergency evacuation plan.
- Create a substantial hazard to people or the environment by mobilizing existing contamination or generating disease vectors.

Significance conclusions are presented regarding the significance of each identified hazards and hazardous materials impact, per the significance classification system provided in Section C.1 (Introduction to Environmental Analysis).

### C.9.3.2 Approved Project Impacts and Mitigation Measures

Table C.9-1 presents a summary of the impacts and mitigation measures applicable to the Approved Project.

**Table C.9-1. Summary of Impacts and Mitigation: Hazards and Hazardous Materials**

Impact No. and Text	Mitigation Required	CEQA Conclusion
Impact HZ-1: Create a substantial hazard to people or the environment through the routine transport, use, or disposal of hazardous materials or as a result of an accidental release of hazardous materials.	WR-6.3: Maintain vehicles and equipment.	Class II
Impact HZ-2: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	None.	Class III
Impact HZ-3: Create a substantial hazard to people or the environment as a result of being located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	None.	No Impact
Impact HZ-4: Create a substantial aeronautical or motor vehicle hazard or result in a significant aerial obstruction within 2 miles of an airport or airstrip.	None.	Class III
Impact HZ-5: Expose people or structures to a risk of loss, injury, or death involving wildland fires.	HZ-5.1: Cease work during Red Flag Warning. PS-1.1: Develop and implement service agreement Fire Department.	Class II
Impact HZ-6: Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.	None.	Class III
Impact HZ-7: Create a substantial hazard to the public or the environment by mobilizing existing contamination or generating disease vectors.	HZ-7.1: Prohibit standing water for extended periods of time.	Class II
Impact HZ-8: Contribute to cumulatively considerable hazards and hazardous materials impacts.	None.	Class III

### C.9.3.3 Revised Solar Project Impacts

Seven hazards impacts are addressed in this section; cumulative impacts are evaluated in Section C.9.3.6.

***Impact HZ-1: Create a substantial hazard to people or the environment through the routine transport, use, or disposal of hazardous materials or as a result of an accidental release of hazardous materials (Class II)***

The same equipment that was described in the 2010 Final EIR would be used to construct the Revised Project. The Revised Project would include fewer PV panels than the Approved Project, but would compress the construction schedule from five years to approximately 18 months. Construction activities would be shorter but more intense. The risk of a leak or accidental spill of hazardous materials would be the same as described in the 2010 Final EIR, and the same APMs and mitigation measures would apply. The Revised Project no longer includes evaporation ponds associated with water treatment, and therefore the risk of mobilizing contaminants through brine harvesting no longer exists. With implementation of mitigation measures, this impact would remain less than significant (Class II).

***Impact HZ-2: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (Class III)***

The nearest school, Panoche Elementary School, is located 0.68 miles from the Revised Project site boundary. Based on the distance of the school from the project site, the 2010 Final EIR concluded that the risk of hazardous emissions, including cadmium telluride flakes or dust, remains negligible. The Revised Project will be no closer to the Panoche Elementary School. Therefore, this impact would be the same for the Revised Project and would remain less than significant (Class III).

***Impact HZ-3: Create a substantial hazard to people or the environment as a result of being located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (No Impact)***

The project site is not listed as a hazardous materials site, and no new nearby hazardous materials sites have been identified. Accordingly, like the Approved Project, the Revised Project would not create a substantial hazard to people or the environment due to the disturbance of a prior hazardous materials site. No impact would occur.

***Impact HZ-4: Create a substantial aeronautical or motor vehicle hazard or result in a significant aerial obstruction within 2 miles of an airport or airstrip (Class III)***

The 2010 Final EIR analyzed glint and glare impacts from approximately 3-4 million smaller panels that would be installed for the Approved Project and concluded that such impacts would be less than significant. The Revised Project will include approximately one million larger panels for the Revised Project over a reduced project footprint. Although the number of PV panels would be reduced, panels would be larger and would still be a source of glint or glare for passing motorists and air traffic. However, glint and glare impacts would be similar with the Revised Project and would remain less than significant (Class III).

***Impact HZ-5: Expose people or structures to a risk of loss, injury, or death involving wildland fires (Class II)***

The total number of PV panels installed would decrease from approximately 3 to 4 million for the Approved Project to approximately one million for the Revised Project. The total permanently disturbed area would decrease from 2,203 acres to approximately 1,888 acres. Although the project footprint and the number of project components would be smaller, construction and operation activities (such as personnel smoking) could still increase the risk of wildland fires. This risk would be reduced to a level of that is less than significant through implementation of previously adopted Mitigation Measure HZ-5.1 (Cease work during Red Flag Warning) (Class II).

***Impact HZ-6: Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan (Class III)***

The Revised Project would have a smaller footprint than the Approved Project. It would also include a new perimeter fire access road that would help to improve firefighting capabilities at the project site.

The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. However, the compressed construction schedule would result in much higher daily traffic volumes, which could lead to increased traffic accidents or temporary delays for emergency response vehicles. The large amount of traffic and the large number of construction workers, combined with the remote project location (40 miles from the nearest hospital) could result in delayed access to emergency medical care. This could affect both permanent residents of the valley and project construction workers. This could result in inadequate medical evacuation capabilities at the project site and for the surrounding area. The 2010 project included APM HAZ-5, in which the Applicant committed to construct a helipad at the project site, but the Applicant has deleted the APM as a helipad will no longer be constructed at the project site (see Section C.9.3.2). However, the Revised Project description includes PG&E's temporary helicopter landing zones that could be used in case of medical emergencies. Four helicopter landing zones have been identified (one at the PVS Substation, two along the PG&E transmission route, and one at the Panoche Substation) and are depicted on Figure B-6 (in Section B). Therefore, adequate emergency medical evacuation capabilities are available.

In the 2010 Final EIR, this impact was found to be adverse but less than significant (Class III) because APM HAZ-5 provided a helipad. Because the Revised Project incorporates four temporary helicopter landing zones that could be used for medical emergency evacuations, impacts would remain less than significant (Class III).

***Impact HZ-7: Create a substantial hazard to the public or the environment by mobilizing existing contamination or generating disease vectors (Class II)***

**Valley Fever.** The 2010 Final EIR identified the potential for exposure of construction workers and the public to the airborne fungal spores that cause Valley Fever as a potential impact of the Approved Project and concluded that implementation of dust control mitigation would minimize the likelihood of becoming ill from the airborne fungal spores. The 2010 Final EIR explained that grading and other soil disturbing activities could mobilize the fungus that causes Valley Fever. Like the Approved Project, the Revised Project would result in a similar impact.

Since 2010 and as described in Section C.9.1.1, illness from Valley Fever in other areas of California has been increasing and has occurred at solar project construction sites in San Luis Obispo County. Proper engineering and administrative controls and contractor implementation of worker protection measures can reduce the likelihood that construction workers will contract Valley Fever. The spread of Valley Fever spores during construction can be reduced by properly implementing the dust control requirements set forth in previously adopted Mitigation Measures AQ-1.1 (Develop and implement a fugitive dust plan) and AQ-1.2 (Designate a dust complaint monitor) as described in Section C.4 (Air Quality). Also, the Applicant and construction contractor must comply with the strict regulatory requirements of the California Department of Industrial Relations, which are described in Section C.9.2. In addition, a new mitigation measure, HZ-7.2 (Protect workers and the public from Valley Fever) has been developed to add other specific protective measures. With implementation of these measures and adherence to regulatory requirements, impacts would be less than significant (Class II).

**MM HZ-7.2** **Protect Workers and Public from Valley Fever.** The Applicant shall implement the following measures to reduce the likelihood that construction workers and the public are infected with Valley Fever:

- The Applicant shall prepare a detailed informational brochure explaining Valley Fever, its cause, and its symptoms, and the populations most at risk for the disease. The brochure shall incorporate information provided the California Department of Public Health (DPH) (<http://www.cdph.ca.gov/healthinfo/discond/Pages/Coccidioidomycosis.aspx>) and shall be reviewed by a DPH for adequacy at least 30 days before the start of construction. The approved brochure shall be provided to all residents of the Panoche Valley and all families of students at the Panoche Valley School.
- The Applicant shall make breathing protection gear available to all workers, at their request and at no cost to workers.
- As part of the Safe Worker Environmental Awareness Program, the Applicant shall educate workers to recognize the symptoms of Valley Fever, and to promptly report suspected symptoms of work-related Valley Fever to a supervisor.

**Other contaminants and hazards.** The total graded area for the Revised Project would increase from 200 acres to 392 acres. Although no specific existing contamination has been identified on the project site, grading activities could cause unknown contaminants to become airborne. Like the Approved Project, compliance with existing laws and regulations, including implementation of a Hazardous Materials Business Plan,<sup>2</sup> would ensure that this impact would be less than significant (Class III).

Project activities could result in trash piles, standing water, or open containers that could provide breeding areas for disease vectors such as mosquitos, flies, or rodents. Implementation of APM HAZ-1 (totally enclosed containment for all trash) and Mitigation Measure HZ-7.1 (Prohibit standing water) would reduce the risk of an increase in disease vectors. With implementation of APM HAZ-1 and Mitigation Measure HZ-7.1, this impact would be less than significant (Class II).

Sheep that may be used for vegetation control on the project site could transmit diseases to personnel. This risk would be minimized through implementation of APM HAZ-4 (properly vaccinate grazing livestock), and would remain less than significant (Class III).

#### **C.9.3.4 Changes to Adopted Mitigation Measures**

Mitigation Measure HZ-7.2 (Protect workers and the public from Valley Fever) has been added for the Revised Project. This new mitigation measure is presented in Section C.9.3.3, above. This section addresses changes to mitigation measures that were adopted for the Approved Project in 2010.

The applicant has proposed changes to two mitigation measures and three APMs adopted from the 2010 Final EIR for hazards and hazardous materials. The applicant has proposed to delete Mitigation Measure HZ-1.1 (Harvest wet brine from evaporation pond). This has no effect on impacts because

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<sup>2</sup> Required under Chapter 6.95 of the California Health and Safety Code Article 1–Hazardous Materials Release Response and Inventory Program (Sections 25500 to 25520) and Article 2–Hazardous Materials Management (Sections 25531 to 25543.3). CCR Title 19, Public Safety, Division 2, Office of Emergency Services, Chapter 4–Hazardous Material Release Reporting, Inventory, and Response Plans, Article 4 (Minimum Standards for Business Plans).

evaporation ponds are no longer proposed for use on the solar project. For the same reason, Mitigation Measure HZ-7.1 has been modified as shown below to delete reference to evaporation ponds.

The proposed changes to APM HAZ-3 would not result in more severe or more extensive impacts because grazing will still occur, reducing fire risk, if adequate forage is available. The elimination of APM HAZ-5 would not affect safety or evacuation because the PG&E Upgrades include a helicopter landing zone at the proposed substation; this site can be used during project construction in the event of an emergency. The changes to APM HAZ-6 do not increase risk; they only specify that electrical safety signage will comply with the requirements of applicable electrical codes.

These changes are shown below (modified text is shown in ~~strikeout~~ for removed text and underline for added text). Mitigation Measures and APMs not shown in this section have not changed and are presented for reference only in Appendix 3.

**MM HZ-1.1** ~~Harvest Wet Brine from Evaporation Pond.~~ Evaporation pond residue shall be harvested in brine (~~wet, aqueous~~) form. ~~Residue shall not be permitted to dry out at any time to prevent airborne residue particles.~~

**MM HZ-7.1** **Prohibit standing water.** In order to eliminate the risk of generating disease vectors at the site, during project construction and operations the Applicant shall ensure that open containers be inverted and construction ditches not be allowed to accumulate water. Construction and maintenance operations shall not generate standing water, except for ~~reverse osmosis evaporation stormwater management~~ ponds and temporary water storage ponds. Naturally occurring depressions, drainages, and pools at the site shall not be drained or filled without consulting with the appropriate resource agency (San Benito County, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife) and obtaining the appropriate permits.

**APM HAZ-3** Sheep grazing under the panels will help to keep pasture growth controlled, ~~and in a continued state of agricultural production, as necessary.~~

~~**APM HAZ-5** Based on the remote location of the project site, a helipad will be constructed on site in accordance with the Federal Aeronautics Administration Advisory Circular No. 150/5390-2B "Helipad Design" to provide emergency transportation.~~

**APM HAZ-6** Prior to energizing the project, the Applicant will install ~~a reasonable number of~~ electrical safety signage on all solar arrays in the immediate vicinity of ~~all wiring and on all~~ electrical ~~conduit equipment~~ using weather-resistant and fade-proof materials, as required by applicable electrical code. Warning signs will be designed to be evident to any person tampering with, working on, or dismantling project ~~photovoltaic panels electrical system~~. Sign ~~print language shall substantially conform to comply with the following language: "CAUTION: Solar PV Wiring May Remain Energized After Disconnection During Daylight Hours. Tampering With Wiring May Result in Electric SHOCK or FIRE. Death or Serious Injury May Result. Do Not Expose Wires to Vegetation or Other Flammable Materials."~~ requirements in Electric SHOCK or FIRE. Death or Serious Injury May Result. Do Not Expose Wires to Vegetation or Other Flammable Materials. applicable electrical codes.

### C.9.3.5 PG&E Upgrades Impacts

The temporary and permanent hazards and hazardous materials impacts of the PG&E Upgrades are analyzed in this section. This analysis is based on the impact statements defined for the solar project, but only Impacts HAZ-1 and HAZ-5 apply to the PG&E Upgrades and are evaluated. Most impacts addressed

for the solar project would not occur as a result of construction or operation of the PG&E Upgrades due to the temporary nature of the construction activities and the small permanent changes to PG&E facilities that would result. The following four impacts would not occur as a result of construction or operation of the PG&E Upgrades:

- Impact HZ-2: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school
- Impact HZ-3: Create a substantial hazard to people or the environment as a result of being located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5
- Impact HZ-4: Create a substantial aeronautical or motor vehicle hazard or result in a significant aerial obstruction within 2 miles of an airport or airstrip
- Impact HZ-6: Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan

***Impact HZ-1: Create a substantial hazard to people or the environment through the routine transport, use, or disposal of hazardous materials or as a result of an accidental release of hazardous materials (Class III)***

Construction and operation (including inspection and maintenance) of the PG&E Upgrades would involve the use of heavy machinery, including helicopters. If not properly maintained, this machinery could leak potentially hazardous materials, including diesel fuel, gasoline, lubricant oils, hydraulic fluid, antifreeze, and transmission fluid. An accidental spill or leak of these materials could contaminate soil, surface water, groundwater, or affect construction workers or the public. This risk would be reduced by AMM HAZ-1 (Proper Storage and Disposal of Waste and Hazardous Materials) and AMM WR-1 (Hazardous Material Spill Prevention and Response Plan), which would be implemented as part of the proposed PG&E Upgrades. The full text of these AMMs is presented in Table B-12 (Section B.11). This impact would be less than significant (Class III).

***Impact HZ-5: Expose people or structures to a risk of loss, injury, or death involving wildland fires (Class III)***

Construction of the PG&E Upgrades would take between 12 and 16 weeks. Several components of the PG&E Upgrades (including the microwave towers at the Call and Panoche Mountain sites and the OPGW in the Panoche Hills) are located in remote open space where fire risk is generally high. Vehicles idling on dry vegetation or personnel smoking near dry vegetation could ignite a wildfire. This risk would be reduced by AMM HAZ-2 (Curtail Work During Red Flag Conditions) and AMM HAZ-3 (Fire Season Preparedness), which would be implemented as part of the proposed PG&E Upgrades. The full text of these AMMs is presented in Table B-12 (Section B.11). This impact would be less than significant (Class III).

***Impact HZ-7: Create a substantial hazard to the public or the environment by mobilizing existing contamination or generating disease vectors (Class III)***

As described in Section C.9.1.1 and C.9.3.3 (Impact HZ-7), Valley Fever is present in Fresno and San Benito Counties. Construction workers are especially at risk for contracting the disease due to their exposure to dust. Two AMMs are included as AMMs by PG&E to reduce the risk related to Valley Fever: AMM AQ-1 (Reduce fugitive dust) and AMM HAZ-4 (Reduce risk of Valley Fever). With implementation of these measures and compliance with existing regulations, as defined in Section C.9.2, this impact would be less than significant (Class III).

### **C.9.3.6 Cumulative Impacts**

The projects that have been constructed or proposed in the area of potential cumulative effects have changed since 2010, as described in Section D. With implementation of mitigation, the Revised Project and the PG&E Upgrades would result in less than significant impacts associated with the transport, use, disposal, or foreseeable upset of, or accidents involving hazardous materials during construction (Class II). Like the Revised Project and the PG&E Upgrades, cumulative projects would be expected to adhere to all applicable laws and regulations to reduce the potential impacts from hazards, including impacts associated with emissions or handling of hazardous or acutely hazardous materials, substances, or waste. With implementation of mitigation, the Revised Project construction and operation would result in less than significant impacts associated with wildland fires (Class II). Like the Revised Project, cumulative projects would be expected to adhere to standard fire prevention protocols to reduce the potential impacts from hazards, including impacts associated with wildland fires to less than significant. Therefore, even considering the revised cumulative project list, the Revised Project and the PG&E Upgrades would not combine with impacts of other projects and their contribution to cumulative impacts would not be cumulatively considerable and would not result in a cumulatively significant impact (Class III).

## **C.9.4 Summary of Impacts**

The significance of impacts for hazards and hazardous materials for the Revised Project and for the PG&E Upgrades is summarized in Sections C.9.4.1 and C.9.4.2. Section C.9.4.3 summarizes the impacts of all project components.

### **C.9.4.1 Revised Solar Project**

The impacts summarized in Table C.9-1 remain accurate, except that a new mitigation measure, MM HZ-7.2 (Protect Workers and Public from Valley Fever) is recommended for the Revised Project. The Revised Project would have the same less than significant impacts (Class II and Class III) as did the Approved Project.

### **C.9.4.2 PG&E Upgrades**

With implementation of all specified AMMs, the impacts of the PG&E Upgrades related to hazards and hazardous materials would be less than significant (Class III). AMM HAZ-1 (Proper storage and disposal of waste and hazardous materials) and AMM WR-1 (Hazardous material spill prevention and response plan) would protect soil and water from contamination. AMM HAZ-2 (Curtail work during red flag conditions) and AMM HAZ-3 (Fire season preparedness) would reduce the risk of loss, injury, or death due to wildland fire. AMM HAZ-4 (Reduce risk for Valley Fever) would help protect workers at risk for Valley Fever. No other impacts associated with hazards and hazardous materials would occur as a result of implementation of the PG&E Upgrades.

### **C.9.4.3 Overall Significance of Impacts**

The overall impacts of the solar project and the PG&E Upgrades would be less than significant (Class III) or less than significant with implementation of mitigation (Class II). For the solar project, hazards and hazardous materials impacts related to the routine transport, use, or disposal of hazardous materials or as a result of an accidental release of hazardous materials, risk of loss, injury, or death due to wildland fire, and the mobilization of existing contaminants or the generation of disease vectors would be less

than significant with implementation of mitigation (Class II). All other solar project impacts related to hazards and hazardous materials would be less than significant (Class III). All potential impacts of the PG&E Upgrades related to hazards and hazardous materials would be less than significant (Class III), as would be all cumulative impacts related to hazards and hazardous materials.

## C.9.5 References

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