

3.8 Hazards and Hazardous Materials

This section of the Draft EIR evaluates potential impacts related to Hazards and Hazardous Materials associated with implementation of the proposed Golden State Natural Resources Forest Resiliency Demonstration Project (proposed project). This section describes the existing conditions and hazards present at the proposed feedstock source locations (Sustainable Forest Management Projects), proposed pellet processing facility sites in Northern California (Lassen Facility) and the Central Sierra Nevada foothills (Tuolumne Facility), and the export terminal in Stockton, California (Port of Stockton), and evaluates the potential for project-related activities to result in significant impacts related to Hazards and Hazardous Materials, considering proposed project design features that could reduce or eliminate associated impacts. A total of 6 comment letters contained scoping comments that pertained at least in part to Hazards and Hazardous Materials in response to the Notice of Preparation (NOP) (see Appendix A). These comments generally related to the potential presence of legacy contaminants in soil and groundwater, the handling of hazardous materials during operation of the project, potential fire risks, and release of potential hazardous building materials during any demolition activities.

3.8.1 Environmental Setting

3.8.1.1 Introduction

The existing conditions presented in this section are based on Phase I environmental Site Assessments prepared for the Lassen and Tuolumne sites. A Phase II Environmental Site Assessment was also prepared for the Tuolumne site. In addition, a separate search for all three facility sites was prepared of available environmental records and databases consistent with what is known as the Cortese List, as defined by California Government Code Section 65962.5, as well as other non-Cortese List databases that provide information on potential hazardous substance storage or releases that could adversely affect new land uses at these sites.

3.8.1.2 Sustainable Forest Management Projects

Feedstock destined to the Lassen and Tuolumne facilities for manufacturing of wood pellets will be wood byproducts sourced from Sustainable Forest Management Projects such as hazardous fuel reduction projects, construction of shaded fuel breaks, and salvage harvests (see Chapter 2, Project Description, for a full description). The feedstock would originate from private, state, tribal, and federal timberlands located within the Working Area of the two wood pellet production facilities. In general, timberlands are not associated with substantive quantities of hazardous materials, legacy contaminants, or associated with potential hazards such as close proximity to airports, schools, or emergency/evacuation plans, however site-specific details can vary.

3.8.1.3 Northern California (Lassen Facility) Site

Site Description

The proposed production facilities would be located on a nearly 65-acre site that is currently partially developed on the northern end with a railroad siding, a gravel deck, internal roadways, a well pump house and water tower. Approximately 51 acres of the 218-acre parcel to the south of the production facilities would be used for log decking (storage). The southerly parcel is undeveloped. The majority of the undeveloped areas of the project site consist of non-native grassland with a mix of annual grasses and forbs. Mowed agricultural fields are present in the northern portion of the project site as well as five earthen ditches. The project site is surrounded by widely

scattered rural development and open space, generally composed of cropland, sagebrush scrub, and wet meadow.

Database Search

A Phase I Environmental Site Assessment prepared for the site did not identify any recognized environmental conditions, including historical recognized environmental conditions or controlled recognized environmental conditions (Appendix F1, Phase I Environmental Site Assessment – Lassen). The Lassen Facility site was not listed on any Cortese List databases, nor were any identified within a mile of the site. The Lassen Facility site was also not listed in any of the other environmental databases (non-Cortese List) reviewed (Appendix F1). Two listings were identified adjacent to the Lassen site, a petroleum release within the southwestern adjacent railyard, which was remediated in 2005 with a current status of “case closed” on the State Water Resources Control Board’s Geotracker database, and a wastewater discharge permit issued for the Nubieber Railroad Depot and dormitory pond, which is located east of the Lassen site (SWRCB 2023a).

Schools

There are no schools or daycare centers located within a quarter mile of the Lassen Facility site. The nearest school to the site is more than 2.5 miles to the northeast in Bieber, California.

Airports

The nearest airport to the Lassen Facility site is Southard Field, located approximately 4.2 miles to the northeast. The nearest public airport is the Dunsmuir Municipal-Mott Airport located approximately 58 miles to the northwest.

Wildfire Hazard

According to mapping compiled by the California Department of Forestry and Fire Protection (CAL FIRE), the portion of the Lassen Facility site north of Babcock Road is located in the Local Responsibility Area (LRA), and is not within a Very High Fire Hazard Severity Zone. The portion of the site south of Babcock Road, which will be dedicated to feedstock processing and storage activities, and the areas immediately adjacent to the west of the site, are within the State Responsibility Area and mapped as being in a High Fire Hazard Severity Zone (CAL FIRE 2008, 2024a).

3.8.1.4 Central Sierra Nevada (Tuolumne Facility) Site

Site Description and History

The Tuolumne site totals 58.56 acres that is currently partially developed with existing humanmade structures and other features generally concentrated within the center of the site. The improvements include buildings, stockpiling and staging areas, paved and gravel roadways, gravel lots, and other features associated with the property’s historic use as wood processing mill that operated on the site until mid-2020. The mill was used by Sierra Pacific Industries for finished bark and colored mulch processing but no milling or treatment of products occurred at the site under Sierra Pacific. Prior to Sierra Pacific Industries ownership, the facility was an operational sawmill run by Louisiana Pacific. A wood shaving plant owned by American Wood Fibers is located adjacent to the west side of the site, and two residences are located adjacent to the northwest corner of the site. Agricultural land is located to the north, east, and south.

The previous Louisiana Pacific-Keystone sawmill facility was purchased by Fiberboard Corporation (a subsidiary of Louisiana Pacific) in 1969 from Sequoia Mills (DTSC 2023a). The ownership and operations under Sequoia Mills are not well known but Louisiana Pacific operated the 68-acre facility until 1986 when it was shut down (DTSC 2023a). The facility included a log storage area with a log storage pond, a sawmill, wood treating area, drying kiln, and a processed wood storage area. The mill reportedly used fungicidal wood treating products while it was in operation. The treated wood was then taken to the nearby Louisiana Pacific-Standard facility for drying and finishing prior to sale.

Database Search

According to the database search, the Tuolumne Facility site is listed on the Department of Toxic Substance Control Envirostor database related to the sawmill operations by Louisiana Pacific (DTSC 2023a). A Preliminary Assessment completed by the Department of Health Services (now DTSC) showed that sampling was conducted at the site in the 1980s by the Regional Water Quality Control Board (RWQCB) and by consultants for the facility owner. The samples showed the presence of low levels of chlorinated phenols in soil in the wood treatment areas. A copper quinolate-based compound (wood preservative) was also probably used prior to shutdown of the facility (DTSC 2023a). The RWQCB does have an active storm water permit for the site (WQ Order No. 97-03-DWQ). The site is listed in the Envirostor database as part of the DTSC Site Cleanup Program with the current status shown as “Inactive – Needs Evaluation as of 6/25/2008” (DTSC 2023a). The site was not listed on the Geotracker database (SWRCB 2023b).

In 2020, both a Phase I and Phase II Environmental Site Assessment was conducted to identify conditions at the site that might represent a potential threat to human health or the environment (Appendix F2, Phase I Environmental Site Assessment - Tuolumne; Appendix F3, Phase II Environmental Site Assessment - Tuolumne). The Phase I report indicated that there was a potential presence of pentachlorophenol (PCP), an organochlorine based industrial wood preservative commonly used for treatment of utility poles, at the site as well as lead-based paint on historical structures and the two water tanks (Appendix F2). The Phase II investigation carried out the recommendations of the Phase I report to provide laboratory analysis of suspect areas that may have been adversely affected by historical land uses including PCP and lead-based paint. The findings of the Phase II investigation determined that organochlorine pesticides, dioxins and furans, and heavy metals outside of arsenic, and mercury were present in concentrations below the recommended screening levels for commercial land uses (Appendix F3). Arsenic concentration levels, while above the screening levels, were below the naturally occurring levels for arsenic in the area. In one composite sample from the former “Teepee Burner” area of the site, mercury was detected at a concentration that exceeded the commercial screening level (Appendix F3). Several semi-volatile organic compounds (SVOCs) (dibenz (a,h) anthracene, hexachlorobenzene, and bis(2-chloroethyl)ether) were at concentrations over the commercial land use screening levels, however no use of these compounds at the site were considered likely (Appendix F3).

Following the completion of the Phase II report, additional soil samples were collected in late February 2021 to further delineate the horizontal extent of mercury contamination (Appendix F4, Soil Excavation and Disposal Report). The sampling identified an area of approximately 1,600 square feet near the old Teepee Burner that required excavation and removal (Appendix F4). A total of 19.57 tons of soil was subsequently excavated and hauled offsite for disposal at a class II non-hazardous waste facility (Forward Landfill) with confirmation sampling confirming that remaining soils were at a level suitable for commercial land use consistent with applicable regulatory guidelines (Appendix F4).

Schools

There are no schools or daycare centers located within a quarter mile of the site.

Airports

The nearest airport to the Tuolumne Facility site is the Kistler Ranch Airport, located approximately 2.5 miles to the northeast. The nearest public airport is the Oakdale Municipal Airport located approximately 17 miles to the southwest.

Wildfire Hazard

According to mapping compiled by the CAL FIRE, the Tuolumne Facility site is located within the State Responsibility Area and mapped as being in a High Fire Hazard Severity Zone. There are scattered areas designated as Very High FHSZ located approximately 0.17-mile west and northwest of the Tuolumne Facility site (CAL FIRE 2024b).

3.8.1.5 Port of Stockton

Site Description

The West Complex portion of the Port of Stockton, formerly known as the Rough and Ready Island, is currently occupied by approximately 75 facilities or businesses that operate Port-dependent facilities such as bulk material import/export, commercial, industrial, and warehousing operations. Both Union Pacific and BNSF Railway serve the port for current railroad transportation needs. The site was formerly part of the Navy's Computer and Telecommunications Station. The Port has been in coordination with DTSC and CVRWQCB to identify remedial actions within the western portion of Rough and Ready Island due to contamination of subsurface soils and groundwater conditions that occurred from these historical land uses of the island, including farming and bulk petroleum storage and Navy use prior to Port transfer. As detailed in a CEQA review for the West Complex Development Plan for the Rough and Ready Island, contaminants of concern were identified that include lead, pesticides (e.g., DDD, DDE, and DDT), and metals (i.e., copper, lead, mercury, and zinc). A Supplemental Risk Evaluation was performed which identified areas requiring remediation (Port of Stockton 2021).

Portions of the island are within the Former Naval Computer and Telecommunications Station Land Use Covenant (LUC) area, which encompasses approximately 500 acres of Rough and Ready Island that intersect the project site (Port of Stockton 2021). Within its coverage area, the LUC prohibits land uses including residences, hospitals, schools for persons under 18 years of age, daycare centers for children, uses that cover or prevent access to groundwater monitoring wells, uses that would restrict remedial investigations or actions, and activities that would affect groundwater or soils without appropriate state or federal approvals.

In addition, under existing operating conditions on the West Complex, the Port and Port tenants continue to store and use potentially hazardous materials including but not limited to adhesives, lubricants, paints, solvents, oils, and fuels in underground storage tanks (Port of Stockton 2021). Older buildings located on the island could contain asbestos or lead-based paints.

Database Search

According to the database search, the Port of Stockton site is listed on the State Water Resources Control Geotracker database related to past activities associated with the Navy's Naval Communication Station (SWRCB 2023b). The site is also listed in the Envirostor database related to the Navy's activities, mentioned above, and for the land use restrictions associated with the existing contamination (DTSC 2023b).

Schools

The Port of Stockton is located in an industrial area, and there are no schools or daycare centers located within a quarter mile of the site.

Airports

The nearest airport to the Port of Stockton site is the Stockton Metropolitan Airport, located approximately 6 miles to the southeast.

Wildfire Hazard

The Port of Stockton site is located adjacent to the San Joaquin River surrounded by agricultural lands and other industrial land uses. According to CAL FIRE, the Port of Stockton site is located in a Local Responsibility Area (LRA) and is designated as "Unzoned" (i.e., not within a FHSZ). CAL FIRE has determined that all of San Joaquin County has no Very High Fire Hazard Severity Zones (CAL FIRE 2007). The closest area of high fire risk is located approximately 16 miles southwest of the site (CAL FIRE 2024).

3.8.2 Regulatory Setting

3.8.2.1 Federal

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 (42 USC 9601–9675), commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. Through CERCLA, the U.S. Environmental Protection Agency (EPA) was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, EPA obtains private-party cleanup through orders, consent decrees, and other small-party settlements. EPA is authorized to implement CERCLA in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies.

Emergency Planning and Community Right-to-Know Act

Authorized by Title III of the Superfund Amendments and Reauthorization Act, the Emergency Planning and Community Right-to-Know Act was enacted by Congress as the national legislation on community safety. This law is designed to help local communities protect public health, safety, and the environment from chemical hazards. To implement the act, Congress requires each state to appoint a State Emergency Response Commission. The State Emergency Response Commissions are required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee for each district. Broad representation by firefighters, health officials, government and media representatives, community groups, industrial facilities, and emergency managers ensures that all necessary elements of the planning process are represented.

Hazardous Materials Transportation Act

The U.S. Department of Transportation (USDOT) regulates hazardous materials transportation under Title 49 of the United States Code. State agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the California Department of Transportation (CalTrans). These agencies also govern permitting for hazardous materials transportation. Title 49 of the Code of Federal Regulations reflects laws passed by Congress as of January 2, 2006. USDOT also administers the Federal Railroad Administration which regulates rail safety including the rail transport of hazardous materials.

Occupational and Safety Health Act

Congress passed the Occupational and Safety Health Act to ensure worker and workplace safety. Its goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. In order to establish standards for workplace health and safety, the Occupational and Safety Health Act also created the National Institute for Occupational Safety and Health as the research institution for the Occupational Safety and Health Administration (OSHA). OSHA is a division of the U.S. Department of Labor that oversees the administration of the Occupational and Safety Health Act and enforces standards in all 50 states.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from “cradle to grave.” This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground storage tanks (USTs) storing petroleum and other hazardous substances. The Federal Hazardous and Solid Waste Amendments are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste, as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive UST program.

Federal Disaster Mitigation Act

The Federal Disaster Mitigation Act of 2000 requires that states review local hazard mitigation plans (LHMPs) as part of the state hazard mitigation planning process. In California, the California Office of Emergency Services (OES)

is authorized to initially review LHMPs which are then sent to Federal Emergency Management Agency planning staff for final review and approval.

3.8.2.2 State

Cortese List

California Government Code Section 65962.5 requires that information regarding environmental impacts of hazardous substances and wastes be maintained and provided at least annually to the Secretary for Environmental Protection. Commonly referred to as the Cortese List, this information must include the following: sites impacted by hazardous wastes, public drinking water wells that contain detectable levels of contamination, USTs with unauthorized releases, solid waste disposal facilities from which there is migration of hazardous wastes, and all cease and desist and cleanup and abatement orders. This information is maintained by various agencies, including DTSC, the State Department of Health Services, State Water Resources Control Board, and the local (typically county) Certified Unified Program Agency (CUPA). However, the list is no longer centrally maintained and each of the agencies has their own databases/records; thus, the Cortese List is not just a single list.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR 330 et seq.). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

California Hazardous Waste Control Act

DTSC is responsible for the enforcement of the Hazardous Waste Control Act (California Health and Safety Code, Section 25100 et seq.), which creates the framework under which hazardous wastes are managed in California. The law provides for the development of a state hazardous waste program that administers and implements the provisions of the federal RCRA cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent than federal requirements. The Hazardous Waste Control Act lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

According to Title 22 of the California Code of Regulations, substances having a characteristic of toxicity, ignitability, corrosivity, or reactivity are considered hazardous waste. Hazardous wastes are hazardous substances that no longer have a practical use, such as material that has been abandoned, discarded, spilled, or contaminated or is being stored prior to proper disposal.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program was created in 1993 by Senate Bill 1082 to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities of environmental and emergency management programs. The program is

implemented at the local government level by CUPAs. The program consolidates, coordinates, and makes consistent the following hazardous materials and hazardous waste programs:

- Hazardous Waste Generation (including on-site treatment under Tiered Permitting)
- Aboveground Petroleum Storage Tanks (only the spill prevention control and countermeasure plan)
- USTs
- Hazardous Material Release Response Plans and Inventories
- California Accidental Release Prevention Program (CalARP)
- Uniform Fire Code Hazardous Material Management Plans and Inventories

Lassen County Environmental Health, now a division of the Lassen County Department of Planning and Building Services, is the CUPA for Lassen County. Tuolumne County Environmental Health Division is the CUPA for Tuolumne County. San Joaquin County Health Services Department is the CUPA for San Joaquin County, including the City of Stockton.

California Accidental Release Prevention Program

Similar to the EPA Risk Management Program, CalARP (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. CalARP meets the requirements of the EPA Risk Management Program, which was established pursuant to the Clean Air Act Amendments.

The Accidental Release Prevention Law is implemented by the CUPA and requires that any business where the maximum quantity of a regulated substance exceeds the specified threshold quantity register with the county as a manager of regulated substances and prepare a risk management plan. A risk management plan must contain an off-site consequence analysis, a 5-year accident history, an accident prevention program, an emergency response program, and a certification of the truth and accuracy of the submitted information. Businesses submit their plans to the CUPA, which makes the plans available to emergency response personnel.

California Health and Safety Code

In California, the handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95, of the California Health and Safety Code (Section 25500 et seq.). Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a hazardous materials business plan. Hazardous materials business plans contain basic information about the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state.

Chapter 6.95 of the California Health and Safety Code establishes minimum statewide standards for hazardous materials business plans (California Health and Safety Code Section 25503.5). Each business must prepare a hazardous materials business plan if that business uses, handles, or stores a hazardous material (including hazardous waste) or an extremely hazardous material in quantities greater than or equal to the following:

- 500 pounds of a solid substance
- 55 gallons of a liquid
- 200 cubic feet of compressed gas

- A hazardous compressed gas in any amount (highly toxic with a threshold limit value of 10 parts per million or less)
- Extremely hazardous substances in threshold planning quantities

In addition, in the event that a facility stores quantities of specific acutely hazardous materials above the thresholds set forth by California code, facilities are also required to prepare an EPA Risk Management Program plan and a CalARP plan. The EPA Risk Management Program plan and CalARP plan provide information about the potential impact zone of a worst-case release and require plans and programs designed to minimize the probability of a release and mitigate potential impacts.

California Emergency Services Act

Under the Emergency Services Act (California Government Code Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the emergency response plan, which is administered by the Governor's Office of Emergency Services (OES). The OES coordinates the responses of other agencies, including the California Environmental Protection Agency, California Highway Patrol, RWQCB, air quality management districts, and county disaster response offices. In addition, OES is responsible for reviewing LHMPs in accordance with FEMA regulations.

Water Protection

The State Water Resources Control Board protects water quality in California by setting statewide policy. The State Water Resources Control Board supports the nine RWQCBs, which, within their areas of jurisdiction, protect surface and groundwater from pollutants discharged or threatened to be discharged to the waters of the state. This protection is carried out by the RWQCB through the issuance and enforcement of National Pollutant Discharge Elimination System permits, regulation of leaking USTs and contaminated properties through the Leaking Underground Storage Tank (LUST) and SLIC programs, respectively. USTs are regulated under Chapter 6.7 of the California Health and Safety Code and Title 23, Chapter 16 of the California Code of Regulations.

3.8.2.3 Local

Lassen County

Lassen County General Plan

Safety Element 2023. The Lassen County General Plan was issued in 2000, however the Safety Element was updated on June 13, 2023.

Policy Programs.

1. Implement a study to locate and identify areas of existing and potential fire, geologic, and health hazards.
2. Require all structures and developments to strictly adhere to Public Resource Code 4291 [Forestry land management].
3. Subdivision and minor land division ordinances should require that roads constructed be of sufficient width and that there be multiple ingress and egress options for evacuation routes.

4. Population centers should be encouraged to improve or install water systems with adequate storage capacities.
5. Communities should be protected by fuel breaks together with fire suppression equipment backed up with an adequate water supply.
6. For the purpose of faster response time of fire suppression equipment, all major and minor roads should have signs identifying their names.
7. Adoption of guidelines for waste disposal from land development and that the guidelines set by Lahontan Regional Water Quality Control and Central Valley Regional Water Quality Control Boards are strictly adhered to.

Goal 1: Protect Lives. Implement applicable federal and State regulations and local ordinances designed to protect life safety.

Policy 1.1: Protect Lives. Implement applicable federal and State regulations and local ordinances designed to protect life safety.

- **Action 1.1A: Defensible Development.** The most recently adopted California Fire Code, Fire Hazard Severity Zone Maps, California Building Codes, SRA Fire Safe Regulations, and Fire Hazard Reduction Around Buildings and Structures Regulations shall be applied to all applicable additions, remodels, reconstruction, and new development in very high fire hazard severity zones and State Responsibility Areas (SRAs). Fire protection plans that include risk analysis, fire response capabilities, fire safety requirements, mitigation measures and design considerations for non-conforming fuel modification, and wildfire education and maintenance shall be required for new development and subdivisions in very high fire hazard severity zones and SRAs, as determined by the County Fire Warden.
- **Action 1.1B: Water Supply.** The County will work with CAL FIRE, and water providers during the review of new development to identify areas vulnerable to wildfire due to inadequate water supply for firefighting and require improvements of the applicant when deemed necessary by the County Fire Warden (e.g., expansion of water supply, storage hydrants). Ensure that water supply infrastructure adequately supports future development and provides adequate water flow to combat structural and wildland fires during peakload water use. New water systems shall equal or exceed the California Fire Code or California Code of Regulations, while aligning with the efforts of the Lassen County Groundwater Management Plan.
- **Action 1.1C: Evacuation and Access.** In Chapter 9.16 of the County Code, continue to require new development in Very High Fire Hazard Severity Zones to provide a second access road or improvements to evacuation routes if necessary, to provide for safe access of emergency equipment and civilian evacuation concurrently. The width, surface, grade, radius, turnarounds, turnouts, bridge construction, and lengths of fire apparatus access roads shall meet the requirements of the State Fire Codes. All requirements and any deviations will be at the discretion of the County Fire Warden. Evacuation routes should be incorporated into existing Community Wildfire Protection Plans where available.

Policy 1.4: Economic and Recreational Resource Protection. Minimize economic loss and disruption to agriculture (crops/animals/timber) and recreation resources from natural and human-caused hazards.

- **Action 1.4A: Fuel Management.** Continue to support fuels/vegetation management programs across the County to reduce the wildfire hazard throughout County and promote forest health, timber management, livestock production and wildlife habitats. For community fuel breaks or other management programs run by local Fire Agencies or State or Federal Agencies, maintain regular lines of communication and offer technical assistance as needed and possible. For County roadway vegetation management, prioritize management of roadside vegetation currently not in conformance with regulations.

Lassen County Environmental Health Division

The Environmental Health Division of the Lassen County Department of Planning and Building Services, is the Certified Unified Program Agency (CUPA) that was developed to consolidate the administration of six specific state hazardous materials programs under one agency. Under the CUPA, site inspections of these hazardous materials programs (Aboveground Petroleum Storage Act [APSA], Underground Storage Tanks [UST], Hazardous Waste Tiered Treatment, Hazardous Waste Generators, Hazardous Materials Management and Response Plans, and the California Fire Code) are consolidated and accomplished by a single inspection. These departments also provide emergency response to hazardous materials events, performing health and environmental risk assessment and substance identification.

Lassen County, City of Susanville, & Susanville Indian Rancheria Hazard Mitigation Plan

Lassen County, the City of Susanville, and the Susanville Indian Rancheria collaborated to prepare the 2019 update of the Local Hazard Mitigation Plan (LHMP) which was previously adopted by the jurisdictions in 2011. The LHMP represents the current understanding of the natural and technological hazards having the potential to cause death, injuries, property damage, community disruption, and economic consequences within Lassen County, captures current mitigation capabilities and efforts, and presents mitigation actions that may be taken to reduce those impacts prior to such hazard events. The LHMP demonstrates the community's commitment to mitigation, fulfills regulatory requirements as established by the Federal Emergency Management Agency (FEMA), establishes eligibility for seeking hazard mitigation assistance grants, and serves as a guide to local decisions makers to implement mitigation programs (Lassen County 2019).

Tuolumne County

Tuolumne County General Plan

Goal 9E. Provide structural fire protection to persons and property within Tuolumne County consistent with the needs dictated by the level of development and in accordance with current Federal, State, and local fire protection agency regulations and policies.

Policy 9.E.3. Require new development to be consistent with State and County regulations and policies regarding fire protection.

Goal 9G. Establish and maintain a codified fire protection risk management strategy which requires new development within Tuolumne County to incorporate or supply fire protection infrastructure and

improvements necessary so that such development does not exceed the capabilities of the County's fire protection resources.

Policy 9.G.1. Maintain County fire protection regulations that are consistent with Section 4290 or the equivalent of the California Public Resources Code and other applicable fire protection regulations.

Goal 9I. Minimize the risk of loss of life, injury, illness, property damage and alteration of established land use patterns resulting from the use, transport, treatment, and disposal of hazardous materials and hazardous wastes.

Policy 9.I.1. Ensure that the use, storage, transport, treatment and disposal of hazardous materials and hazardous wastes within Tuolumne County complies with Federal, State, and local regulations and safety standards.

Tuolumne County Environmental Health Division

Tuolumne County Environmental Health Division is certified by Cal-EPA as the CUPA agency for Tuolumne County that administers specific hazardous materials/hazardous waste programs. As the CUPA, the Environmental Health Division is responsible for administering the underground and aboveground storage tank programs as well as the Accidental Release Program, hazardous waste generator regulations, and hazardous materials business plan program. A Hazardous Materials Business Plan (HMBP) is required for any facility that stores materials in quantities greater than 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for gases.

Tuolumne County Multi-Jurisdictional Hazard Mitigation Plan

The Tuolumne County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), adopted in December 2017 and updated in 2018, is a guide to hazard mitigation throughout Tuolumne County and acts as a tool to help decision makers direct hazard mitigation activities and resources. In the context of the MJHMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including wildfire. The goal of this multi-jurisdictional plan is to arrive at practical, meaningful, attainable, and cost-effective mitigation solutions to minimize each jurisdiction's vulnerability to the identified hazards and ultimately reduce both human and financial losses subsequent to a disaster (Tuolumne County 2018).

San Joaquin County

San Joaquin County Environmental Health Department

The Environmental Health Department (EHD) is, among other areas of public health protection, responsible for inspection of underground and above ground storage tanks, and enforces environmental health regulations associated with business and construction activities. The EHD works with Emergency Response teams in the event of a hazardous waste incident. As the CUPA, the EHD works with other agencies to coordinate hazardous materials program inspection and permitting activities.

San Joaquin County Local Hazard Mitigation Plan

The San Joaquin County Local Hazard Mitigation Plan (LHMP) was adopted on April 11, 2023, and updates the prior 2018 LHMP. The LHMP intends to provide strategies for the County and other local jurisdictions to identify and implement mitigation actions for reducing damages from various natural and technological disasters. The LHMP

also outlines a process for assessing and analyzing those hazards to which San Joaquin County is most vulnerable, analyzes the risk posed to people and property by natural hazards, and considers mitigation actions that the County could implement before such events occur. The 2023 LHMP further establishes prioritized mitigation goals and adopts a five-year implementation timeline, which San Joaquin County seeks to implement, subject to funding and resource limitations (San Joaquin County 2023).

City of Stockton

Stockton General Plan

Goal SAF-1. Safe Community – Create a safe and welcoming environment in all areas of the city at all times of day.

Policy SAF-2.2. Prepare sufficiently for major events to enable quick and effective response.

Policy SAF-2.6. Minimize the risk to city residents and property associated with the transport, distribution, use, and storage of hazardous materials.

3.8.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to Hazards and Hazardous Materials are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to Hazards and Hazardous Materials would occur if the project would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires? (General fire hazards from project operations are addressed in this section. See Chapter 3.17 for specific evaluation of wildfire hazards.)

3.8.4 Impact Analysis

3.8.4.1 Methodology

The proposed project would consist of three primary phases: feedstock acquisition, wood pellet production, and transport to market. The impact analyses below evaluate each of these primary phases as related to Hazards and Hazardous Materials. The analysis is based on the hazards technical memorandums that were prepared for the Lassen and Tuolumne facilities and a current search of environmental databases that was performed for both of those facilities and the Port of Stockton site, as well as project site characteristics and proposed land uses. Potential public safety hazards (related to schools, emergency response plans, and wildland fires) are based on the information presented in the subsections below. In determining the level of significance, the analysis acknowledges that the proposed project would be designed and required to comply with all applicable state and local ordinances and regulations (summarized in Section 3.8.2, Regulatory Framework). Potential airport-related safety hazards or excessive noise impacts are not analyzed below because none of the facilities are located within two miles of an airport, nor within an adopted airport land use plan, and thus there would be no impact. (General noise impacts are addressed within Section 3.11 (“Noise”) of this document.)

3.8.4.2 Project Impacts

Impact HAZ-1 The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Construction - Common to all Project Elements

Construction of the proposed project would involve demolition, grading, and construction of new buildings and associated improvements including roadways and rail spurs. A variety of hazardous materials that are commonplace for construction activities (e.g., fuels for equipment and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials) would be transported to, stored, and used during construction activities. If not transported, used, or disposed of in a safe manner, hazardous materials used during construction could represent a potential threat to the public and the environment. However, these materials would be transported, used, and disposed of in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. For example, hazardous materials would not be disposed of or released onto the ground or into the underlying groundwater or any surface water during construction of the proposed project, and completely enclosed containment would be provided for all refuse generated in the planning area. Additionally, all construction waste, including trash, litter, garbage, solid waste, petroleum products, and any other potentially hazardous materials, would be removed and transported to a permitted waste facility for treatment, storage, or disposal. Use of these materials during construction for their intended purpose would not pose a significant risk to the public or the environment. Consistent with federal, state, and local requirements, transport, removal, and disposal of hazardous materials would be conducted by a permitted and licensed service provider. Any handling, transport, use, or disposal would comply with all applicable federal, state, and local agencies and regulations, including EPA, DTSC, Cal/OSHA, the California Department of Transportation, the RCRA, and the respective CUPA agency for each location (Lassen County Environmental Health Division) or Tuolumne County Environmental Health Division or San Joaquin County Health Services Department).

In addition, as with all businesses that use hazardous materials, construction companies are required to prepare and implement a Hazardous Materials Business Plan describing procedures for the handling, transportation, generation, and

disposal of hazardous materials. CUPA agencies would be responsible for ensuring compliance with these regulations including, but not limited to, the Hazardous Waste Control Act, the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program, and the Aboveground Storage Tank Program

Construction activities would also include some demolition of existing structures which could potentially include hazardous building materials such as asbestos or lead-based paint (LBP). However, prior to any issuance of a demolition permit, a hazardous building materials survey would be required by a licensed contractor. The identification, removal, and disposal of asbestos containing materials (ACMs) is regulated under Title 8 of the California Code of Regulations Section 1529 and 5208. The identification, removal and disposal of LBP is regulated under 8 CCR 1532.1. For both ACM and LBP, all work must be conducted by a State-certified professional. If ACM and/or LBP is determined to exist onsite, a site-specific hazard control plan must be prepared and submitted to the appropriate agency detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel. If necessary, a State-certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill(s) licensed to accept such waste. Once all abatement measures have been implemented, the contractor would conduct a clearance examination and provide written documentation to the demolition and building permitting agency that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

Given the existing regulatory requirements regarding the identification and abatement of hazardous building materials and transportation, handling, and disposal of hazardous waste, the potential for adverse effects related to demolition and construction activities is minimized. As such, construction-related activities are not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be **less than significant**. No mitigation is required.

Operations – Common to all Project Elements

During operations, all hazardous chemicals and products such as fuels, oils, cleaning supplies, landscaping chemicals and fertilizers, and various other commercially available substances, would be used in compliance with existing regulations and guidelines of OSHA, Cal/OSHA, the National Institute for Occupational Safety and Health, U.S. Department of Transportation, EPA, California Department of Public Health, and the local CUPA agency. The use, storage, and transport of hazardous materials and hazardous wastes is subject to all applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public and the environment associated with hazardous materials. As such, the proposed project would not result in a foreseeable significant hazard to public health or the environment by routine use, transport, and disposal of hazardous chemicals. Therefore, impacts would be **less than significant**, and no mitigation is required.

Feedstock Acquisition

Sustainable Forest Management Projects

The feedstock acquisition would be sourced from Sustainable Forest Management Projects on California's private, state, tribal, and federal timberlands. The various activities and techniques used to acquire the wood are described in Section 2.4; all of which have specific criteria and protocols on what and how the wood byproducts would be acquired. Feedstock would generally be sourced from hazardous fuels reduction projects, construction of shaded fuel breaks, removal of forest residuals slated for open-burning, site preparation, fire, insect or disease salvage

harvests, commercial timber harvest residuals, pre-commercial thinning harvests, and mill residuals. The acquisition phase of feedstock would not involve substantive quantities of hazardous materials or wastes outside of what is generally described above and largely limited to fuels and oils that are associated with trucks, loading equipment, and other motorized equipment. Use of this equipment, the vehicles and any associated maintenance would be done in accordance with applicable federal, state, and local health and safety laws and regulations. In addition, feedstock acquisitions would occur in dispersed locations throughout a broad region and predominantly in very low populous areas such that the potential for routine transport, use, or disposal of hazardous materials to cause significant adverse effects would be remote. Therefore, the potential impact would be **less than significant**, and no mitigation is required.

Wood Pellet Production

Lassen Facility

Wood pellet production at the Lassen Facility would include interim storage of feedstock prior to processing the feedstock into new wood pellets. Processing would include use of a debarking drum, chipper, stacker reclaimer, , a green hammer mill, furnace dryer, dry hammer mill, and the pellet mill. The drum dryer and furnace would include air systems and emissions control measures to meet air quality requirements (see Section 3.2 Air Quality for more detailed discussion of air quality impacts related to emissions). Additional facilities onsite would include an office, maintenance shop, locker rooms, and a guard house, all of which would have associated needs for various hazardous materials and chemicals that are managed in accordance with applicable federal, state, and local (Lassen County) health and safety laws and regulations. Compliance with these existing regulatory requirements would ensure that the potential for routine transport, use, or disposal of hazardous materials to cause significant adverse effects would be remote. Therefore, the potential impact would be **less than significant**, and no mitigation is required.

Tuolumne Facility

The Tuolumne Facility as it relates to hazardous materials transport, use, and disposal of hazardous materials would operate similar to the Lassen Facility and would be subject to the same federal and state regulations. Local health and safety requirements would be enforced by the Tuolumne County Environmental Health Division. As with the Lassen Facility, compliance with these existing regulatory requirements would ensure that the potential for routine transport, use, or disposal of hazardous materials to cause significant adverse effects and impacts would be reduced to **less than significant** with no mitigation is required.

Transport to Market

Port of Stockton

The transport to market activities at Port of Stockton would include a new wood pellet storage and loadout facility, including a rail unloading system, two storage domes, a ship loadout system, an office, maintenance shop, and quality control lab. To control air quality there would be a series of dust control systems as well as fire and explosion protection equipment incorporated into the proposed improvements for safety. As above, all hazardous materials and chemicals including fuels, oils, paints, cleaning products, and others would be managed in accordance with existing federal, state, and local (San Joaquin County) requirements. As above, compliance with these existing regulatory requirements would ensure that the potential for routine transport, use, or disposal of hazardous

materials to cause significant adverse effects and impacts would be reduced to **less than significant** with no mitigation required.

Impact HAZ-2 The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Construction - Common to all Project Elements

Construction of the proposed project would involve hazardous materials such as fuels and lubricants which would be transported to and used on-site in construction vehicles and equipment. However, the potential for use of these materials to result in significant hazards to the public or the environment would be low, for the reasons described below.

The project contractor and construction crews would be required to comply with all applicable regulations governing the storage, handling, and disposal of hazardous materials and waste. As discussed in Section 3.9, Hydrology and Water Quality, project construction would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), which would identify potential pollutant sources that may be associated with construction activity, identify non-stormwater discharges, and recommend means and methods to effectively prohibit the discharge of any pollutants during construction. In addition, the SWPPP would include Best Management Practices (BMPs), including proper handling of petroleum products, such as proper petroleum product storage and spill response practices, to prevent any releases. The BMPs must be implemented during demolition or at the start of new construction. In general, unauthorized releases at construction sites tend to be localized and with implementation of spill response BMPs any spills that may occur tend to be relatively small and quickly contained such that adverse effects are minimized.

These BMPs would help control the use of hazardous substances during construction and would minimize the potential for such substances to leave the site, thus reducing the potential for the public to be exposed to construction-related chemicals and materials and reducing the potential for such substances to be released into the environment. With implementation of applicable construction BMPs and adherence to applicable hazardous materials and waste regulations, impacts involving the release of hazardous materials into the environment due to upset and accident conditions during project demolition and construction would be less than significant.

Therefore, there is a low risk of upset of hazardous materials during construction; impacts would be **less than significant**, and no mitigation is required.

Operation – Common to all Project Elements

While the types and quantities of hazardous materials use at the various project locations (feedstock locations, Lassen Facility, Tuolumne Facility, and Port of Stockton) may vary, all project operations would be subject to existing federal, state, and local health and safety regulations regarding the transportation, use, and disposal of hazardous materials. Use of fuels, oils, paints, commercial cleaners, lubricants, or associated maintenance products, and repair activities during operations would be required to be managed in accordance with a Hazardous Materials Management Plan and Hazardous Materials Business Plan. Operations would be required to submit business information and hazardous materials inventory forms within these plans to the local CUPA agency. In addition, all hazardous materials handlers are subject to inspection every three years and required to adhere to applicable Fire Code requirements related to hazardous materials storage. Each CUPA, requires all new commercial and other

users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state and federal regulations including the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 22. All U.S. DOT, CalTrans, and rail safety regulations administered by the Federal Railroad Administration would also apply to all operations involving transportation of hazardous materials, although transport of feedstock does not meet the definition of a hazardous material. As such, during operations, by adhering to existing requirements and regulations, impacts associated with reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment would be **less than significant**, and no mitigation is required.

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

Feedstock Acquisition

Sustainable Forest Management Projects

Feedstock acquisition would occur in scattered locations over a broad area and would not include substantive hazardous emissions or handle substantive quantities of hazardous materials. While it may be possible for collection or acquisition of feedstock could occur within a quarter mile of a school, it is not considered highly likely, given the locations of feedstock, and combined with the relatively low amount of hazardous materials (such as petroleum fuel for mobile equipment), the potential impact would be considered **less than significant** with no mitigation required.

Wood Pellet Production

Lassen Facility

As mentioned above in the Environmental Setting section, there are no schools or daycare centers located within a quarter mile of the Lassen Facility site. As a result, there would be **no impact** related to emitting hazardous emissions within a one-quarter mile of a school.

Tuolumne Facility

There are also no schools or daycare centers located within a quarter mile of the Tuolumne Facility site. As a result, there would be **no impact** related to emitting hazardous emissions within a one-quarter mile of a school.

Transport to Market

Port of Stockton

As mentioned above in the Environmental Setting section, there are no schools or daycare centers located within a quarter mile of the Port of Stockton site. As a result, there would be **no impact** related to emitting hazardous emissions within a one-quarter mile of a school.

Impact HAZ-4 The project could create a significant hazard to the public or the environment due to being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5.

Feedstock Acquisition

Sustainable Forest Management Projects

Feedstock acquisition would occur in scattered timberland locations over a broad area. These locations are generally undeveloped with no humanmade structure or history of commercial or industrial use, and the potential for the area to be included on a list of hazardous materials sites is therefore unlikely. As a result, the potential impact would be considered **less than significant**, and no mitigation required.

Wood Pellet Production

Lassen Facility

As noted above in the setting section, the Lassen Facility site was not included on any Cortese List databases, nor non-Cortese List databases reviewed (Appendix F1). While two listings were identified adjacent to the Lassen site, one has a current status of “case closed,” indicating that no threat to human health or the environment remains, and the other relates to an existing permitted facility, which is not an indication of a release that could adversely affect the project site (SWRCB 2023a). As a result, the potential impact related to being included on a list of hazardous materials sites is considered **less than significant**, and no mitigation required.

Tuolumne Facility

According to the environmental database search, the Tuolumne Facility site was listed on the Department of Toxic Substance Control Envirostor database related to the former sawmill operations by Louisiana Pacific (DTSC 2023a). A Preliminary Assessment completed by the Department of Health Services (now DTSC) showed that sampling conducted at the site in the 1980s indicated the presence of low levels of chlorinated phenols and copper in soil in areas used for wood treatment (DTSC 2023a). The RWQCB does have an active storm water permit for the site (WQ Order No. 97-03-DWQ). The current status for the site in the Envirostor database as part of the DTSC Site Cleanup Program was shown as “Inactive – Needs Evaluation as of 6/25/2008” (DTSC 2023a). As noted above in the Environmental Setting, both a Phase I and Phase II Environmental Site Assessment were conducted at the site in 2020 (Appendix F2, Appendix F3). The Phase I report indicated that there was a potential presence of pentachlorophenol (PCP), an organochlorine based industrial wood preservative commonly used for treatment of utility poles, at the site as well as lead-based paint on historical structures and the two water tanks (Appendix F2). The Phase II investigation carried out a soil sampling program based on the Phase I recommendations. The findings of the Phase II investigation determined that mercury, several SVOCs, and organochlorine pesticides, dioxins and furans, and heavy metals outside of arsenic, and mercury were present but in concentrations below the recommended screening levels for commercial land uses (Appendix F3). Arsenic concentration levels, while above the screening levels, were below the naturally occurring levels for arsenic in the area. In one composite sample from the former “Teepee Burner” area of the site, mercury was detected at a concentration that exceeded the commercial screening level (Appendix F3). Several semi-volatile organic compounds (SVOCs) (dibenz (a,h) anthracene, hexachlorobenzene, and bis(2-chloroethyl)ether) were at concentrations over the commercial land use screening levels, however no use of these compounds at the site were considered likely (Appendix F3).

As discussed above in the Environmental Setting, 19.57 tons of soils impacted by mercury were excavated and disposed offsite at a Class II disposal site (Forward Landfill) (Appendix F4). Following excavation, confirmation sampling was conducted and verified that all the impacted soils with potential health or environmental risks were removed and remaining soils were below applicable regulatory guidelines (Appendix F4).

As a result of the previous remediation efforts at the site, the potential for legacy contaminants to adversely affect future commercial land use is reduced to a **less than significant** level with no mitigation required.

Transport to Market

Port of Stockton

The Port of Stockton site was included on both the DTSC Envirostor and SWRCB Geotracker databases related to the past operations of the Naval Computer and Telecommunications Station (DTSC 2023b; SWRCB 2023b). Land use restrictions have been placed on portions of the Rough and Ready Island and include the Project site. The institutional controls limit the exposure to workers and visitors to the site, however and construction activities that would include earthwork activities have the potential to disturb legacy contaminants at the site that adversely affect construction workers and the public. As a result, this impact is considered **potentially significant** and requires mitigation (**MM-HAZ-1**).

Impact HAZ-5 The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Feedstock Acquisition

Sustainable Forest Management Projects

Feedstock acquisition would occur in dispersed locations throughout the region timberlands. These activities would be temporary and would not require road closures or any other physical interference with an emergency response plan or evacuation plan. As a result, the potential impact would be **less than significant**, with no mitigation required.

Wood Pellet Production

Lassen Facility

During project construction, temporary lane closures on Babcock Road may be necessary. Potential lane closures and slower traffic during construction could affect emergency response activities, including evacuations, however the project site is located in a low population area where the roadway grid offers multiple access points, and issues of traffic congestion are uncommon. Additionally, the project would be required to comply with the Lassen County Public Works and Roads Department traffic control requirements, and Sheriff's Department guidance relating to emergency response, further reducing the prospect of substantive interruptions.

Operations at the Lassen Facility would not interfere or impair with emergency response or evacuation. Proposed access improvements would adhere to all emergency ingress and egress requirements in accordance with building code and fire code requirements. Emergency access is discussed further in Section 3.14, Transportation. Therefore, the potential impact to emergency access or evacuation during construction and operation would be **less than significant**. No mitigation is required.

Tuolumne Facility

During construction, temporary closure of the driveways along La Grange Road may be necessary. Potential lane closures and slower traffic during construction could affect emergency response activities, including evacuations. The project site has multiple access points to LaGrange, and access to adjoining properties would be maintained.

Additionally, the project would be required to comply with the Tuolumne County Sheriff's Department guidance relating to emergency response, further reducing the prospect of substantive interruptions.

Once constructed, operations at the Tuolumne Facility would not interfere or impair with emergency response or evacuation. Proposed improvements would adhere to all emergency ingress and egress requirements in accordance with building code and fire code requirements. Emergency access is discussed further in Section 3.14, Transportation. Therefore, the potential impact to emergency access or evacuation during construction and operation would be **less than significant**. No mitigation is required.

Transport to Market

Port of Stockton

During construction, temporary lane closures may be necessary which could interfere with emergency response activities, including evacuations. However, the project site is bounded by the river and therefore is not in the pathway of any emergency or evacuation routes. Additionally, the City of Stockton's guidance for the response to extraordinary emergency situations would continue without any substantive interruptions.

Once constructed, operations at the Port of Stockton would not interfere or impair with emergency response or evacuation. Proposed improvements would adhere to all emergency ingress and egress requirements in accordance with building code and fire code requirements. . Emergency access is discussed further in Section 3.14, Transportation. Therefore, the potential impact to emergency access or evacuation during construction would be **less than significant**. No mitigation is required.

Impact HAZ-6 The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires.

Feedstock Acquisition

Sustainable Forest Management Projects

Feedstock acquisition would be sourced from Sustainable Forest Management Projects on California's private, state, tribal, and federal timberlands. The acquisition of the wood pellets will follow all land management agreements, follow best management practices, and follow the stewardship agreements between GSFA and USFS, and state and federal laws and regulations. The various activities and techniques used to acquire the wood are described in Section 2.4; all of which have specific criteria and protocols on what and how the wood byproducts would be acquired. Feedstock would generally be sourced from hazardous fuels reduction projects, construction of shaded fuel breaks, removal of forest residuals slated for open-burning, site preparation, fire, insect or disease salvage harvests, commercial timber harvest residuals, pre-commercial thinning harvests, and mill residuals. The intent of feedstock acquisition activities would be to reduce excess fuels within forested areas, reducing overall wildfire risk. Feedstock acquisition would occur in timberlands where there is high risk of wildland fires. However, no structures or other improvements are proposed and the number of workers involved would be relatively minor. As a result, the potential impacts related to exposure to fire as a result of these activities would be considered **less than significant**. Wildfire is specifically discussed further in Section 3.16, Wildfire.

Wood Pellet Production

Lassen Facility

The portion of the project site north of Babcock Road is located in the Local Responsibility Area (LRA), and is not within a Very High Fire Hazard Severity Zone. The portion of the site south of Babcock Road, which will be dedicated to feedstock storage activities, and the areas immediately adjacent to the west of the site, are within the State Responsibility Area and mapped as being in a High Fire Hazard Severity Zone (CAL FIRE 2008, 2024a). As discussed in Section 3, Project Description, comprehensive fire and explosion protection features have been incorporated into project design plans, including fire suppression system and ancillary infrastructure to support the facilities' fire water demands. In addition, all proposed improvements would be designed and constructed in accordance with building code and fire code requirements which would minimize the fire risk at the site.

Wood pellets do not contain hazardous materials. However, improper handling and storage of wood pellets may result in the potential for fire risk. Wood dust during production can be a potential fire source. In addition, oxidation of stored pellets can lead to self-heating and combustion. Absent proper controls, the impact of a pellet fire would be **potentially significant**. In order to reduce fire risks from facility operations, preventive measures including regular maintenance along with belt speed sensors, motor current sensors, multiple levels of automated fire sprinkler systems, and housekeeping would be used to mitigate fire risk. Once the product stream is dry, fire risk increases, however, spark detectors with chemical suppression are placed at all critical points throughout the process. Also, all dry process equipment is outfitted with bearing temperature sensors to monitor and allow any high-temperature issues to be preemptively corrected. The pellet storage silos would utilize temperature sensors throughout the storage volume that trigger aeration fans to cool any hotspot that may occur, while operational controls would be designed to keep residence time in the silos as short as possible to reduce any occurrence of hotspots. Dust collection systems with explosion panels would be installed throughout the dry fiber handling process to reduce airborne dust and minimize the fire and explosion hazard the dust presents. Finally, 2 fire water pumps (one acting as a back-up) with ancillary piping and controls, rated at 150 horsepower (hp) and a fire water tank that can provide flow for at least 2 hours at the facility. The back-up pump that would be diesel-engine powered in case the site loses power in order to provide a timely response to a fire incident. All fire prevention and suppression systems would comply with all applicable current standards and codes set by the National Fire Protection Agency and the California Building Code as well as any additional requirements deemed necessary by the applicable local fire authority. To ensure implementation of these measures, a Fire Prevention Plan shall be required as mitigation measure (**MM-HAZ-2**). (Further discussion related to the project's potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires is further detailed in Section 3.16 of this Draft EIR.)

Tuolumne Facility

The project site is located within the State Responsibility Area and mapped as being in a High Fire Hazard Severity Zone (CAL FIRE 2024b). Regardless, as discussed in Section 3, Project Description, comprehensive fire and explosion protection features have been incorporated into project design plans, including fire suppression system and ancillary infrastructure to support the facilities' fire water demands. In addition, all proposed improvements would be designed and constructed in accordance with building code and fire code requirements which would minimize the fire risk at the site.

As with the Lassen Facility, production and storage of wood pellets represents a **potentially significant** fire risk. Preventive fire protection measures would be required mitigation, including regular maintenance along with belt

speed sensors, motor current sensors, multiple levels of automated fire sprinkler systems, and housekeeping designed to mitigate fire risk. Once the product stream is dry, fire risk increases, however, spark detectors with chemical suppression are placed at all critical points throughout the process. Also, all dry process equipment is outfitted with bearing temperature sensors to monitor and allow any high-temperature issues to be preemptively corrected. The pellet storage silos would utilize temperature sensors throughout the storage volume that trigger aeration fans to cool any hotspot that may occur, while operational controls would be designed to keep residence time in the silos as short as possible to reduce any occurrence of hotspots. Dust collection systems with explosion panels would be installed throughout the dry fiber handling process to reduce airborne dust and minimize the fire and explosion hazard the dust presents. Finally, 2 fire water pumps (one acting as a back-up) with ancillary piping and controls, rated at 150 horsepower (hp) and a fire water tank that can provide flow for at least 2 hours would be installed at the facility. The back-up pump would be diesel-engine powered in case the site loses power in order to provide a timely response to a fire incident. All fire prevention and suppression systems would comply with all applicable current standards and codes set by the National Fire Protection Agency and the California Building Code as well as any additional requirements deemed necessary by the applicable local fire authority. To ensure implementation of these measures, a Fire Prevention Plan shall be required as mitigation measure (**MM-HAZ-2**). (Further discussion related to the project's potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires is further detailed in Section 3.16 of this Draft EIR.)

Transport to Market

Port of Stockton

The Port of Stockton site is located in a developed urbanized industrial area that is surrounded by agricultural lands and other industrial land uses with no wildlands in the vicinity. All proposed improvements would be constructed in accordance with applicable building code requirements.

As noted above, long-term storage of wood pellets may result in self-heating and potential combustion. This would be a **potentially significant** impact. Therefore, the two storage domes would employ temperature sensors, moisture sensors, and multi-gas detectors to monitor the pellet storage pile conditions and include multiple levels of fire suppression systems as well as dust suppression systems to minimize the potential for any fire or combustion conditions to develop. Operations would also include preventative measures including minimizing storage time to lower the risk of fire. In the event any of the dome instrumentation triggers there would be a nitrogen deluge system designed to flood the domes with nitrogen, displacing the oxygen supply. Additionally, the following fire monitoring and suppression system would be used:

- All conveyors would have a linear temperature sensing cable to monitor product temperature along the length of the belt.
- Transfer points would have IR sensors (several per chute) to detect any high temperature particles.
- Each of the above detection methods can trigger fire water nozzles to spray the product stream.

All fire prevention and suppression systems would comply with all applicable current standards and codes set by the National Fire Protection Agency and the California Building Code as well as any additional requirements deemed necessary by the applicable local fire authority. These measures are part of the project as designed, and are further incorporated into required project mitigation (**MM-HAZ-2**).

3.8.4.3 Cumulative Impacts

The project combined with other past, present, and reasonably foreseeable cumulative projects would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Feedstock Acquisition

Sustainable Forest Management Projects

Impacts related to the routine transport, storage, use or disposal of hazardous materials or wastes tend to be site-specific and do not combine with one another to become cumulatively considerable. The types and quantities of hazardous materials/wastes and their exposure hazards can vary greatly from site to site. The feedstock acquisition sites would be dispersedly located in timberland sites where there is typically negligible hazardous materials use. Any cumulative projects that would require hazardous materials use would be required to comply with all applicable federal, state, and local standards regarding the handling, use, transportation, storage, and disposal of hazardous materials, which are intended to minimize the risk to public health and the environment. With adherence to existing regulatory requirements during construction and operation of the cumulative projects, including transportation regulations, releases from routine transport, use or disposal of hazardous materials would be minimized, and would apply to all cumulative projects. Therefore, the cumulative impact related to routine transport, storage, use, or disposal of hazardous materials during construction and operation would be **less than significant**.

Wood Pellet Production

Lassen Facility

As above, all cumulative projects that would require hazardous materials use would be required to comply with all applicable federal, state, and local standards regarding the handling, use, transportation, storage, and disposal of hazardous materials, which are intended to minimize the risk to public health and the environment. With adherence to existing regulatory requirements during construction and operation of the cumulative projects, including transportation regulations, releases from routine transport, use or disposal of hazardous materials would be minimized, and would apply to all cumulative projects. Therefore, the cumulative impact related to routine transport, storage, use, or disposal of hazardous materials during construction and operation would be **less than significant**.

Tuolumne Facility

Comparable to the Lassen Facility, cumulative projects in the vicinity of the Tuolumne Facility that would require hazardous materials use would be required to comply with all applicable federal, state, and local standards regarding the handling, use, transportation, storage, and disposal of hazardous materials, which are intended to minimize the risk to public health and the environment. With adherence to these existing regulatory requirements during construction and operation of the cumulative projects, including transportation regulations, releases from routine transport, use or disposal of hazardous materials would be minimized, and would apply to all cumulative projects. Therefore, the cumulative impact related to routine transport, storage, use, or disposal of hazardous materials during construction and operation would be **less than significant**.

Transport to Market

Port of Stockton

The Port of Stockton is located in an industrial area with a much denser presence of hazardous materials use. However, just as with the other project locations, any cumulative projects that would require hazardous materials use would be required to comply with all applicable federal, state, and local standards regarding the handling, use, transportation, storage, and disposal of hazardous materials, which are intended to minimize the risk to public health and the environment. With adherence to existing regulatory requirements during construction and operation of the cumulative projects, including transportation regulations, releases from routine transport, use or disposal of hazardous materials would be minimized, and would apply to all cumulative projects. Therefore, the cumulative impact related to routine transport, storage, use, or disposal of hazardous materials during construction and operation would be **less than significant**.

The project combined with other past, present, and reasonably foreseeable cumulative projects would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Feedstock Acquisition, Wood Pellet Production, and Transport to Market

Common to all elements of the proposed project, construction and operation of the Project, just like the other cumulative projects would include the use, storage, handling, and disposal of varying quantities of hazardous materials, that could include petroleum products, oils, cleaning fluids, lubricants, paints, solvents, and fuels. Similarly, these types of projects generate varying quantities of hazardous wastes, all of which would be required to adhere to the comprehensive set of existing federal, State, and local regulatory requirements, including the HMBP programs, and applicable local CUPA (e.g., Lassen County, Tuolumne County, and San Joaquin County) regulations. These programs require all users of hazardous materials to implement employee training, safe storage, and appropriate handling requirements to ensure that upset and accident conditions are minimized. In the unlikely event that an accidental release was to occur, these programs require spill response measures to ensure that incidents are quickly contained and, therefore, would not travel off-site in a way that could cumulatively combine to affect large numbers of people or affect substantial parts of the environment. It would also be unlikely and speculative to assume that accidental releases would occur contemporaneously in a manner such that it could become cumulatively considerable.

For the reasons described above, the Project, in conjunction with other cumulative projects, would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction and operation, and cumulative impacts would be **less than significant**.

The project combined with other past, present, and reasonably foreseeable cumulative projects would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Feedstock Acquisition

Sustainable Forest Management Projects

Feedstock acquisition activities would occur in dispersed locations that are predominantly in remote timberland areas that are unlikely to be located within a quarter mile of a school. These activities also would be temporary and involve limited quantities of hazardous materials. As a result, the proposed project could not combine with other cumulative projects to become cumulatively considerable and the cumulative impacts associated with hazardous emissions or acutely hazardous materials, substances, or waste within one-quarter mile of a sensitive land use would be **less than significant**.

Wood Pellet Production

Lassen Facility

The Lassen Facility is not located within a quarter mile of a school or daycare center. As a result, the proposed activities at the Lassen Facility could not combine with cumulative projects to become cumulatively considerable. There would be **no impact**.

Tuolumne Facility

The Tuolumne Facility is also not located within a quarter mile of a school or daycare center. Therefore, the proposed activities at the Lassen Facility could not combine with cumulative projects to become cumulatively considerable. There would be **no impact**.

Transport to Market

Port of Stockton

The Port of Stockton is not located within a quarter mile of a school or daycare center. As a result, the proposed activities at the Port of Stockton could not combine with cumulative projects to become cumulatively considerable. There would be **no impact**.

The project combined with other past, present, and reasonably foreseeable cumulative projects could create a significant hazard to the public or the environment due to being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5.

Feedstock Acquisition

Sustainable Forest Management Projects

The feedstock acquisition areas would primarily be located in dispersed timberland locations that are unlikely to be included on any list of hazardous materials sites. As a result, the feedstock acquisition activities could not combine with cumulative projects to become cumulatively considerable and there would be **no impact**.

Wood Pellet Production

Lassen Facility

As discussed above for the project analysis, hazardous materials sites are typically handled on a project-by-project basis and generally do not contribute to a cumulative significant impact related to hazardous materials sites. As discussed above, the Lassen Facility site was not included on any Cortese List databases, nor non-Cortese List databases reviewed (Appendix F1). Two listings identified adjacent to the Lassen site included a closed site and a permitted facility which are both not an indication of a release that could adversely affect the public or environment. Other cumulative projects may be located on a hazardous materials list compiled pursuant to Government Code Section 65962.5. However, there are multiple government agencies who oversee development on hazardous materials sites, including the RWQCB, which provides guidelines for soil and water contaminations, and the Lassen County Environmental Health Division, which provides the Compliance Guideline for Hazardous Wastes and Materials. Therefore, the Project would not result in a cumulatively considerable impact related to hazardous materials sites for the Lassen facility and impacts would be **less than significant**.

Tuolumne Facility

As discussed above, the Tuolumne Facility site was listed on the Envirostor database related to the former sawmill operations by Louisiana Pacific (DTSC 2023a). However, as noted above, hazardous materials sites are typically handled on a project-by-project basis and generally do not contribute to a cumulative significant impact related to hazardous materials. In addition, the remediation of the identified mercury contamination was completed at the site (Appendix F4). Therefore, considering the completion of remediation at the site, the potential impact is considered **less than significant**.

Transport to Market

Port of Stockton

As with the Tuolumne Facility, the Port of Stockton site includes known subsurface contaminants and has been subject to previous investigations and site remediation. There are currently land use restrictions and institutional controls to prevent exposure to legacy contaminants. As part of those restrictions, any subsurface work would be required to coordinate with either DTSC or RWQCB to ensure that earthwork activities are conducted in accordance with a work plan or soil management plan that is protective of site workers and the public. Therefore, since sites that listed as hazardous materials sites generally do not combine to become cumulatively considerable, and the existing land use restrictions at the site would require any construction activities to be done in accordance with appropriate safety measures, the potential impact would be **less than significant**.

The project combined with other past, present, and reasonably foreseeable cumulative projects would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Feedstock Acquisition

Sustainable Forest Management Projects

The feedstock acquisition areas would primarily be located in dispersed timberland locations that are generally not very populated areas and the acquisition efforts would be relatively short term efforts at any one location. As a result, feedstock acquisition is unlikely to impair or physically interfere with emergency response or evacuation. As

a result, the feedstock acquisition activities would not combine with cumulative projects to become cumulatively considerable and the impact would be **less than significant**.

Wood Pellet Production

Lassen Facility

Lassen County updates and implements a Local Hazard Mitigation Plan (LHMP) in accordance with the Disaster Relief Act and provides the coordination, conjunction and collaboration with all County departments including the OES to maximize the County's potential to prevent, prepare for, respond to and recover from emergency response and evacuation situations. The LHMP provides specific courses of action that jurisdictions intend to follow to reduce vulnerability and exposure to future hazard events. Hazard mitigation strategies help to eliminate losses by limiting new exposures in identified hazard areas, diverting a hazard by reducing its impact, and developing an awareness of hazard area locations to plan responsibly for future development. In addition, Lassen County, the City of Susanville, and the Susanville Indian Rancheria have many plans, programs and regulations that address disaster management that include the 2023 Lassen County Community Wildfire Protection Work Plan and the Emergency Operations Plan which have specific response procedures for earthquake, flooding, reservoir failure, fire, and other hazards.

The Project, in conjunction with other cumulative projects would be constructed to current design standards and building codes which include egress and ingress requirements and would not impair or interfere with the LHMP or the County's ability to prevent, prepare or respond to and recover from the identified hazards because existing codes are designed to minimize hazards and protect public health and safety. Therefore, the Project would combine with cumulative projects and the impact would be **less than significant**.

Tuolumne Facility

As above, Tuolumne County also implements a LHMP as well as a County Fire Management Plan, Community Wildfire Protection Plan, and County Emergency Services Plan. As with the Lassen Facility, the Tuolumne facility as well as other cumulative projects would adhere to current building code requirements related to emergency ingress and egress and would not impair or interfere with the County's Hazard Mitigation Plan. Therefore, the Project would combine with cumulative projects and the impact would be **less than significant**.

Transport to Market

Port of Stockton

The Port of Stockton site is already partially developed and located on an island adjacent to the San Joaquin River such that it is not part of any regional evacuation routes. There are two roads that all egress off the island and the proposed Project would not alter the existing road network. Therefore, the proposed Project would not combine with other cumulative projects to become cumulatively considerable. The impact would be **less than significant**.

The project combined with other past, present, and reasonably foreseeable cumulative projects would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires.

Feedstock Acquisition

Sustainable Forest Management Projects

Feedstock acquisition would occur in timberlands where there is high risk of wildland fires. However, no structures or other improvements are proposed as part of feedstock acquisition and the locations would vary. Wildfire risks are dependent on a number of different factors but considering that feedstock acquisition would occur in varied locations and the relatively short time frame spent in any one location, the opportunities for the project to combine with cumulative projects to become cumulatively considerable is remote. In addition, fire safety measures would be incorporated into all feedstock acquisition activities as discussed in more detail in Section 3.16, Wildfire. Therefore, the proposed project would not combine with other cumulative projects to expose people or structures to risk of loss, injury, or death and the impact would be considered **less than significant** with no mitigation is required.

Wood Pellet Production

Lassen Facility

The Lassen Facility is located partially within and adjacent to a High Fire Hazard Severity Zone where there is risk of wildfires that could adversely affect operations. Just as with the proposed improvements for the Project, cumulative projects would also be subject to applicable fire code requirements for all improvements including fire prevention and fire protection such that fire risks are minimized. Therefore, considering the adherence to all fire protection and prevention requirements, the potential for the project to combine with cumulative projects to become cumulatively considerable would be **less than significant**.

Tuolumne Facility

The Tuolumne Facility is located in a High Fire Hazard Severity Zone in the SRA. As with the Lassen facility, all proposed improvements, just as would be for cumulative projects, would be constructed in accordance with applicable fire protection and prevention measures such that the risk of damage, injury or death is minimized. As a result, the potential impact would be **less than significant**.

Transport to Market

Port of Stockton

San Joaquin County has no Very High Fire Hazard Risk Zones and considering that the Port Facility is in a developed industrial area it would not combine with other cumulative projects to expose people or structures to significant risk of loss, injury, or death due to wildfires. The impact would be **less than significant**.

3.8.4.4 Mitigation Measures

MM-HAZ-1 Port of Stockton. Soil Management Plan and Phase II Investigation. Prior to issuance of a grading or building permit, GSNR shall retain a qualified environmental consultant to prepare and implement a Soil Management Plan for all earthwork activities proposed at the site. The Soil Management Plan shall be based on a review of previous environmental subsurface characterizations and in accordance with Department of Toxic Substances Control (DTSC) and/or

Regional Water Quality Control Board (RWQCB) coordination. The consultant shall also prepare a Phase II Work Plan for all structures that would be occupied as part of project operations. The Phase II Work Plan shall include sampling locations, depths, and analytical laboratory testing that will be done to evaluate the potential health risks associated with any existing legacy contaminants of concern that may be present in the subsurface and the potential for adverse health effects related to vapor intrusion. The work plan shall be submitted to San Joaquin County Environmental Health for review and approval prior to commencement of sampling activities at the site. The findings of the Phase II Work Plan shall be compiled in a report documenting the results of the sampling and include recommendations for any further testing or remediation, if applicable. Sampling results shall be compared to RWQCB Regulatory Screening Levels for commercial/industrial land uses and additional sampling conducted as directed by the overseeing agency whether that is San Joaquin County Environmental Health Services, DTSC, or RWQCB. Issuance of a grading or building permit shall only occur upon authority from the overseeing agency once they have determined that no further threat to human health or the environment remains in the areas of the proposed improvements intended for human occupancy.

MM-HAZ-2 **Fire Prevention Plan.** GSNR shall prepare a Site Specific Fire Prevention Plan for each production and storage facility Plan (Lassen Facility, Tuolumne Facility, and Port of Stockton). Development of each Site Specific Fire Prevention Plan shall be consistent with Brown, et al., 2022, *Application of Process Hazard Analysis and Inherently Safer Design in Wood Pellet Production*, American Chemical Society ACS Omega 2022, 7, 47720–47733, and each Plan shall incorporate the following Inherently Safer Design features where applicable, at a minimum:

- Maintenance and housekeeping measures to reduce the risk of “hot spots” and potential fire risk during the production and movement of pellets.
- Identification of early detection measures, including belt speed and motor sensors, spark detectors, temperature sensors.
- Protocols to minimize the residence time of finished pellets in storage silos.
- On-site fire suppression facilities, including water storage and pumping.
- Require that pellet storage silos will be equipped with temperature monitoring systems to detect hot spots.
- Require that each pellet storage silo will also be equipped with an aeration system that will activate when elevated temperatures are detected and blow ambient air through the silo for cooling.
- Require use of an enclosed motors instead of a non-enclosed motors to ensure dust is kept out to prevent fire spots.
- Require multiple dust collectors with explosion panels will be installed throughout the process in order to reduce fire and explosion hazard associated with dry fiber handling generating dust.
- Ensure that all ductwork is designed to have a minimal number of bends to the extent feasible.

The pellet production facilities shall include the following additional measures:

- Require that magnets be located throughout the process to remove ferrous objects from the feedstock and product streams to the extent feasible.

- Ensure quick material turnaround to minimize the risk of a deep-seated fire caused by organic material decomposition.
- Ensure separation of finished product silo storage and railcar from rest of the plant.
- Require all of the following equipment protection systems/sprinkler systems:
 - The Fire Pump Building will be protected with a wet sprinkler system.
 - The Bark Hog Tower will be protected with a dry pipe sprinkler system.
 - The Green Hammer Mill Tower will be protected with a dry pipe sprinkler system.
 - The Dry Hammer Mill Structure will be protected with a dry pipe sprinkler system.
 - The Pelletizer Building will be protected with a wet sprinkler system.
- Require that each baghouse at rail loadout will be provided with fire water connections and spray nozzles.
- Require the inclusion of a Rail Loadout Dust Control System
- Require a Central Dust Control system in the balance of the production facilities.
- Require that well water be treated as necessary to minimize dissolved material in water to reduce scaling and clogging of water deluge systems/plugged nozzle or lines with water scale/hardness.

Each plan shall be reviewed and approved by the Fire Marshall with authority over each site (Lassen County, Tuolumne County, and the Port of Stockton) prior to construction and comply with all applicable current standards and codes set by the National Fire Protection Agency and the California Building Code as well as any additional requirements deemed necessary by the applicable local fire authority.

3.8.4.5 Significance After Mitigation

With implementation of Mitigation Measure HAZ-1, GSNR would retain a qualified environmental consultant to prepare and implement a Soil Management Plan as well as perform a Phase II Environmental Site Assessment to evaluate the subsurface materials for the potential presence of legacy contaminants related to current and past land uses at the Port of Stockton. The mitigation measure would require a site-specific evaluation that includes collection of soil and/or groundwater samples that would be tested by an analytical laboratory with the results compared to regulatory screening levels. Any additional testing or remediation would be required prior to commencement of construction activities to ensure the protection of the health of construction workers and the public. Following implementation of mitigation, Impact HAZ-4 would be reduced to **less than significant**.

With implementation of Mitigation Measure HAZ-2, proper risk management procedures, including maintenance and early detection and fire suppression would be incorporated into facility operations and monitored. Review and coordination with local fire departments would be conducted. The risk of fire during the production and storage of the pellets would be reduced to less than significant. Impact HAZ-6 would be reduced to **less than significant**.

3.8.5 References

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