

5.7 HAZARDS AND HAZARDOUS MATERIALS

5.7.1 Introduction

This section addresses the potential for impacts related to the presence and use of hazards/hazardous materials within the project area. Impacts associated with the project were based on a review of existing literature, a reconnaissance-level field survey, and a search of environmental records for hazardous sites.

5.7.2 Environmental Setting

The project site is located on a small flood plain along the southeastern side of the Nipomo Mesa. Nipomo Creek drains into the Santa Maria River adjacent and south of the project site. On-site elevations range from approximately 200 to 260 feet above mean sea level. The general direction of groundwater flow is anticipated to be south toward the Santa Maria River.

Review of the "Geology of California, Santa Maria Sheet," published by the California Division of Mines and Geology and dated 1958, indicates that the project site is located within the Coast Range geomorphic province of California. The project site is further located at the northern fringe of the Santa Maria Valley, which is formed by the Nipomo Mesa to the north, the San Raphael mountains to the east, and the Solomon Hills to the south. The project site is underlain by older alluvial deposits (CDMG, 1958).

The project site is located within the Nipomo Mesa Sub-basin of the Santa Maria Valley groundwater basin. A shallow groundwater flow/gradient is expected to follow the topography of surface elevations towards the Pacific Ocean to the west-northwest. Estimated groundwater depths may fluctuate due to groundwater pumping, rainfall, and seasonal variations. Two water supply wells are located at the project site. One well is operated by the Cuyama Lane Water Company as a water supply well to serve the industrial users within the larger project site and the other would be used by the proposed asphalt plant. Depth to groundwater at these wells is relatively shallow, at approximately 25-40 feet below ground surface (West Coast Environmental and Engineering, 2003). The project site is located within a 100-year floodplain, which presents special issues associated with the storage and handling of hazardous materials and wastes.

Historically, the project area has been used for sand and gravel pit mining operations, agricultural activity, a few homes, and excavation of soil for fill during U.S. Highway 101 construction. Currently, there is some residential development in the northern portion of the project area, a concrete and asphalt recycling facility, a ready-mixed concrete plant, and a former sand and gravel mine in the southern portion of the project area.

5.5.2.1 Current Site Conditions

On July 27, 2004, Padre visited the proposed asphalt plant project site to assess the current site conditions. The eastern portion of the project site was observed to be utilized as private contractor storage yards and the western portion of the project site is currently utilized for the stockpiling of concrete rubble. One water supply well was observed within the middle portion of the project site. A concrete lined containment area was observed at the southeastern corner of the proposed asphalt plant site; within the containment was a 55-gallon drum, which was observed to be open and overflowing with black liquid, possibly motor oil. Oil staining was observed around the base of the drum and outside of the containment area. This area may be

a former hazardous waste storage area associated with historical industrial operations at the project site. Refer to Figure 5.7-1 for the location of the containment area.

5.5.2.2 Environmental Records Search

An environmental records search was conducted for the project site by Environmental Data Resources, Inc. (EDR) on August 20, 2004. The EDR report was utilized to identify known or suspected areas of contamination, underground storage tank locations, solid waste management facilities, and hazardous waste treatment, storage, and/or disposal locations. One known site was located within a radius of 1 mile of the project site. The Nipomo Transfer Station is located less than ¼ - mile north of the project site, and is classified as a Solid Waste Facility/Landfill Site. This site is a transfer station for solid waste generated in the Santa Maria area for transportation to the Chicago Grade Landfill located in Templeton. No areas of contamination were identified by the EDR database search.

5.7.3 Regulatory Setting

The following section provides a brief description of some of the applicable state and federal regulations relating to the use, storage, and disposal of hazardous substances and petroleum.

Federal Laws/Regulations

Federal Water Pollution Control Act of 1972 (Clean Water Act). The Clean Water Act governs the control of water pollution in the United States. This Act includes the National Pollutant Discharge Elimination System (NPDES) program, which requires that permits be obtained for point discharges of wastewater. This Act also requires that storm water discharges be permitted, monitored, and controlled for public and private entities.

Resource Control and Recovery Act of 1974 (RCRA). RCRA was enacted as the first step in the regulation of the potential health and environmental problems associated with solid hazardous and non-hazardous waste disposal. RCRA, and the formation of the U.S. Environmental Protection Agency (EPA) to implement the Act, provide the framework for national hazardous waste management, including tracking hazardous wastes from point of origin to ultimate disposal.

Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). Under CERCLA, owners and operators of real estate where there is hazardous substances contamination may be held strictly liable for the costs of cleaning up contamination found on their property. No evidence linking the owner/operator with the placement of the hazardous substances on the property is required. CERCLA, also known as Superfund, established a fund for the assessment and remediation of the worst hazardous waste sites in the nation. Exceptions are provided for crude oil wastes that are not subject to CERCLA.

In 1986, Congress established the “innocent landowner defense” in the 1986 amendments to CERCLA known as the Superfund Amendments and Reauthorization Act (SARA). To establish innocent landowner status, the landowner “must have undertaken, at the time of acquisition, all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial and customary practice in an effort to minimize liability.” In an effort to clarify what constitutes “all appropriate inquiry,” the ASTM has developed a standard that provides specific definition of the steps one should take when conducting a “due diligence” environmental site assessment for commercial real estate.

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Small Business Liability Relief and Brownfields Revitalization Act (Brownfields Act) was enacted in 2002 to create new exemptions from Superfund liability, authorizes brownfields revitalization funding, and provides assistance to state and local site clean-up programs. The EPA has released draft All Appropriate Inquiry (AAI) standards in accordance with the National Brownfields which would replace the current ASTM standard for environmental due diligence for protection of potential purchasers of contaminated property.

Hazardous and Solid Waste Amendments of 1984 (HSWA). The HSWA law was enacted to close RCRA loopholes and regulated leaking underground storage tanks (USTs) specifically. The California State Water Resources Control Board (SWRCB), the Central Coast Regional Water Quality Control Board (RWQCB), and the local County Division of Environmental Health, as a Certified Unified Program Agency (CUPA) program, oversee UST regulations and cleanup of leaking USTs.

Asbestos Hazard Emergency Response Act of 1986 (AHERA). The Act is the federal legislation that governs the management and abatement of asbestos-containing materials in buildings.

National Emission Standards for Hazardous Air Pollutants; Asbestos, 40 CFR Part 61. This regulation requires the assessment and proper removal of asbestos-containing materials that could release asbestos when disturbed prior to the demolition of buildings.

Clean Air Act. The regulatory programs that govern stationary sources of air pollution apply to any facility that emits or has the potential to emit conventional pollutants: oxides of nitrogen and sulfur, carbon monoxide, volatile organic compounds (VOCs) or particulate matter. It may also apply to emission sources of certain toxic chemicals. In addition to the existing air district permitting programs required by state law and district rules, a new federal operating permit program must be implemented to meet federal Environmental Protection Agency (EPA) regulations adopted pursuant to Title V of the 1990 amendments of the Clean Air Act. Locally the Clean Air Act regulations are implemented and enforced by the San Luis Obispo Air Pollution Control District (APCD).

California Laws/Regulations

Porter-Cologne Water Quality Control Act (Division 7 of the California Water Code). The Porter-Cologne Act established a regulatory program to protect water quality and protect beneficial uses of the state's waters. The Porter-Cologne Act also established the State Water Resources Control Board and nine regional boards as the main state agencies responsible for water quality in the state. Discharges of wastes (including spills, leaks, or historical disposal sites) where they may impact the waters of the state are prohibited under the Porter-Cologne Act, including the discharge of hazardous wastes and petroleum products. The assessment and remediation of these waters are regulated by the regional boards, the Central Coast Regional Water Quality Control Board administers such waters in the vicinity of the proposed project.

Title 22, California Code of Regulations. Title 22 of the California Code of Regulations regulates the use and disposal of hazardous substances in California. It contains regulatory thresholds for hazardous wastes which are more restrictive than the federal hazardous waste regulations.

California Health and Safety Code Sections 25500 et seq. The California community right-to-know hazardous material law applies to any facility that handles any hazardous material (chemical, chemical-containing products, hazardous wastes, etc.) in a quantity that exceeds

reporting thresholds. The most common thresholds that trigger regulation based on that state statute are 500 pounds of solid, 55 gallons of liquid, and 200 cubic feet of compressed gas, based on the presence of individual chemicals. The basic requirements of hazardous materials and community right-to-know regulations for covered facilities include:

- Determining whether the facility handles hazardous materials;
- Immediate reporting of releases of hazardous materials;
- Submission and update of a Hazardous Materials Business Plan (including a accurate chemical inventory, site map showing hazardous materials storage locations, emergency response plan, and notification procedures) as required by the local administering agency;
- Notification of the local administering agency of the handling of specified quantities of acute hazardous materials and submission of a Risk Management Plan (RMP) as required;
- Annual submission for manufacturing facilities of a Toxic Chemical Release Report (Form R) if threshold amounts of certain toxic chemicals are made, or processed for use; and,
- Requirements for hazardous materials storage imposed by local administering agencies, fire departments, and California Occupational Safety and Health Administration (Cal/OSHA) standards.

California Air Resources Board – Air Toxics Control Measure. Under the California Air Resources Board Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to construction permit issuance, a geologic evaluation is required to determine the presence or absence of naturally-occurring asbestos. If naturally occurring asbestos is found at the site, the applicant must comply with all requirements outlined in the Asbestos ATCM before grading may begin. These requirements may include, but are not limited to, 1) preparation of an “Asbestos Dust Mitigation Plan,” which must be approved by APCD before grading begins; and 2) an “Asbestos Health and Safety Program”, as determined necessary by APCD.

County of San Luis Obispo Regulations

The County of San Luis Obispo has adopted a County Land Use Ordinance, Title 22 of the County Code, which regulates land use within the unincorporated areas of the County. Pertinent sections relating to hazardous materials storage are found in Section 22.10.070 (Operational Standards – Flammable and Combustible Liquids Storage), and Section 22.14.060 (Combining Designations). Relevant sections of each are presented below:

Section 22.10.070 – Flammable and Combustible Liquids Storage.

The storage of flammable or combustible liquids (those with flash points below 140°F) is subject to the following standards.

- A. Applicability. The standards of this section apply in addition to all applicable state and federal standards, including any regulations administered by the County Health Department, Fire Department, Sheriff’s Office, Agricultural Commissioner, and Air Pollution Control District. If any standards of this chapter conflict with regulations

administered by other federal, state, or county agencies, the most restrictive standards apply.

B. Permit Requirements.

1. **Health Department Permit.** A permit for the underground storage of hazardous substances, including but not limited to gasoline and diesel fuel, shall be obtained as set forth in Chapter 8.14 of this Code.
2. **Land Use Permit.** No land use permit is required for the storage of flammable or combustible liquids, except that where the quantity stored exceeds the limitations specified in Subsection D, minor use permit approval is required unless the land use involving the storage of flammable or combustible liquids would otherwise be required by this Title to have Conditional Use Permit approval.

C. Limitation on Use. The storage of flammable or combustible liquids for sale is allowed only in the Recreation, Commercial or Industrial categories, unless authorized by Conditional Use Permit approval.

D. Limitations on Quantity. The quantity of flammable or combustible liquids stored on a site shall be limited as follows: (relevant sections provided below)

2. **Other Areas.** Storage shall be limited to the following quantities on any single building site, unless greater quantities are authorized through Conditional Use Permit or Minor Use Permit approval.

Table 5.7-1. Maximum Quantity Allowed Based on Type of Storage

Type of Liquid	Aboveground	Underground
Combustible	20,000 gallons	No limitation
Flammable	2,000 gallons	20,000 gallons

E. Setbacks. Aboveground storage facilities for flammable or combustible liquids shall be set back 50 feet from any property line or residential use, or as otherwise required by the Uniform Fire Code or Uniform Building Code where a smaller setback is allowed by those codes.

F. Additional Standards. (relevant sections provided below)

2. All aboveground storage of flammable and combustible liquids shall be within types of containers approved by the county fire chief.

Section 22. 14.060 – Flood Hazard Areas.

D. Construction Standards. New structures or any improvement/repair to an existing structure (including manufactured homes) where the value proposed is more than fifty percent of the market value of that existing structure before start of construction of the new structure or any improvement, and prior to the damage requiring the repair are subject to the following construction standards. This can be determined by the assessment roll or by a current appraisal. The appraisal shall be completed by an appraiser with a “Certified General License” issued by the State Office of Real Estate

Appraisal and shall determine full market value of the existing site improvements based on the Uniform Standards of the Professional Appraisal Practices as published by the Appraiser Standards Board of the Appraisal Foundation.

2. Storage and Processing. The storage or processing of materials that in time of flooding are buoyant, flammable, or explosive; that could be injurious to human, animal, or plant life; or that may unduly affect floodway capacity or unduly increase flood heights is not permitted. Storage of other material or equipment may be allowed if not subject to major damage by floods and if firmly anchored to prevent flotation, or if readily removable from the area within the time available after flood warning.

5.7.4 Impact Analysis

5.7.4.1 Thresholds of Significance

For the purposes of the EIR, a potential impact related to the presence of hazardous materials and/or risk of upset impact of hazardous materials is identified as significant based on the following thresholds:

1. Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;
2. Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials within one-quarter mile of an existing or proposed school;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List) and, as a result, would create a significant hazard to the public or the environment;
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area;
6. For a project within the vicinity of a private airstrip, would the project result in the safety hazard for people residing or working in the project area;
7. Impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and,
8. Expose people or structures to a significant risk or loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

5.7.4.2 Asphalt Plant Impacts

Impact HAZ-1. The construction of the proposed asphalt plant would include the installation of asphaltic oil aboveground storage tanks (ASTs) which could potentially impact the project site and potentially the Santa Maria River if ruptured during an upset condition.

Discussion: Construction of the proposed asphalt plant would include the installation of two 20,000-gallon capacity asphaltic oil ASTs and one 1,000-gallon capacity heated asphaltic oil AST. These ASTs would include internal heaters to heat the oil prior to use in mixing with aggregate and other ingredients. The heated oil would have a reduced viscosity and could impact the ground surface and the Santa Maria River if released. ASTs with a capacity in excess of 660 gallons are required to be registered with the SWRCB. Operators of the ASTs are required to prepare a Spill Prevention, Control, and Countermeasures (SPCC) plan for operation of the ASTs and potential upset conditions. The proposed asphalt plant may utilize oils that are semi-solid at ambient temperatures and must be heated prior to use in the asphalt mixing process. Flood walls will be required to protect the AST area from being inundated during a 100-year flood event. The flood walls are anticipated to be no more than four feet tall around the AST area.

Impact Category: Significant but Mitigable

Thresholds of Significance Criteria: 2

Mitigation Measure HAZ-1:

- A. Asphaltic oil ASTs installed at the project site shall be provided with secondary containment capable of holding 110% of the volume of the AST. The containment shall provide adequate protection to prevent inundation of the containment area in the event of a 100-year flood; and,
- B. Prior to operation, the applicant shall prepare and implement a SPCC plan for the operation of on-site ASTs containing oil/petroleum hydrocarbons in excess of 660 with capacities greater than 55 gallons.

Residual Impacts: Construction of necessary flood walls around the ASTs is not anticipated to create a secondary impact to flooding or visual resources. **Mitigation Measure AES-6** addresses potential visual impacts associated with flood walls. With the incorporation of mitigation, impacts would be less than significant.

Impact HAZ-2. Use of diesel fuel or other petroleum hydrocarbon-containing liquids to coat the beds of trucks hauling asphalt from the proposed facility could result in the contamination of soil, storm water, and groundwater.

Discussion: It is common practice for truck operators hauling asphalt to coat the truck beds with diesel fuel prior to loading asphalt at an asphalt plant. The operators commonly use Hudson sprayers to spray diesel fuel on the trailer bed surface to aid in dumping the asphalt at the construction site. This practice is unsafe due to potential fire hazards from the improper use of diesel fuel. This practice also frequently results in the ground surface at the entrance to the asphalt plant to become contaminated from excess diesel fuel running off the truck bed as it proceeds to the asphalt plant. The contaminated soil could also result in the contamination of storm water flowing over the contaminated soil. This condition could also present a potential threat to ground water if significant amounts of diesel fuel are released to the soil. Suitable bio-degradable surfactants are available on the market that could be utilized by the truck operators to prevent the asphalt from sticking to the beds of the truck beds.

Impact Category: Significant but Mitigable

Thresholds of Significance Criteria: 1, 2

Mitigation Measure HAZ-2: During operations, the asphalt plant operator shall not allow the loading of any trucks that have had their beds sprayed with diesel fuel or any other petroleum hydrocarbon-containing liquid. Annual inspections will be conducted by the County Certified Unified Program Agency (CUPA, administered by County Environmental Health) to ensure that soil contamination has not occurred at the site due to spraying of truck beds with diesel fuel or other petroleum hydrocarbon-containing liquids.

Residual Impacts: With the incorporation of mitigation, impacts would be less than significant.

Impact HAZ-3: Due to the project site's presence within a 100-year floodplain, hazardous materials could be released during a significant storm event.

Discussion: The proposed asphalt plant will include the use of various hazardous materials, including asphaltic oil, diesel fuel, liquid propane, oil emulsions, motor and hydraulic oil, waste motor oil, acetylene and oxygen (compressed gases), and hydrated lime. In the event of a significant storm event, these materials could be released if not properly stored. The proposed facility will be required to submit a Hazardous Materials Business Plan with the County's CUPA program, as required by state law. The Hazardous Materials Business plan will include a site map showing hazardous materials storage areas, an emergency response plan, a spill response plan, and an emergency evacuation plan. Flood walls will be required to protect the hazardous materials storage area from being inundated during a 100-year flood event. The flood walls are anticipated to be no more than four feet tall around the storage area.

Impact Category: Significant but Mitigable

Thresholds of Significance Criteria: 1, 2

Mitigation Measure HAZ-3:

- A. Hazardous materials and hazardous wastes shall be stored in areas provided with secondary containment capable of holding 110% of the volume of the materials stored and designed to prevent storm water associated with a 100-year flood event from inundating the storage area (e.g. flood walls with heights above 100-year flood elevation); and,
- B. In accordance with the County's Land Use Ordinance, Title 22, Section 22.14.060(D)(2), propane tanks, ASTs and USTs installed on-site shall be provided with anchoring to prevent the tank from being washed away during a flooding event at the project site.

Residual Impacts

Construction of necessary flood protection measures are not anticipated to create a secondary impact to flooding or visual resources. Construction of the 8-foot sound walls identified in Mitigated Measure NOI-4 are not expected to create secondary impacts to hazardous materials. With implementation of the recommended mitigation measures, residual impacts are anticipated to be less-than-significant.

Impact HAZ-4: The existing 55-gallon drum and former containment area may have contaminated underlying soils.

Discussion: A former containment area containing a 55-gallon drum was observed at the eastern portion of the project site. The containment area may have historically contained hazardous materials or wastes. The 55-gallon drum was observed to be overflowing with oil.

Impact Category: Significant but Mitigable

Thresholds of Significance Criteria: 1, 2

Mitigation Measure HAZ-4:

A. The existing 55-gallon drum at the southeastern containment area shall be removed by a waste oil recycler or hazardous waste transporter after adequate characterization as to the composition of the liquid. The identified containment area at the southeastern portion of the proposed project site shall be adequately assessed to determine whether potential soil contamination exists at this area. This assessment shall include the advancement of shallow drill holes and the collection of soil samples for chemical analyses to determine whether soil contamination is present at this area. A Technical Work Plan for the site assessment activities shall be prepared by a registered geologist or licensed civil engineer and submitted to the County CUPA agency for review and approval prior to implementation. A report documenting results of the site assessment activities shall be submitted to the CUPA agency for review. Identified soil contamination shall be adequately removed from the site for proper disposal prior to construction of the proposed asphalt plant.

B. Should contaminated soil be encountered during construction activities, the SLO APCD shall be notified immediately. Any storage pile of contaminated material must be covered at all times, except when soil is added or removed. The following measures shall be implemented:

- Covers on storages piles shall be maintained in place at all times in areas not actively involved in soil addition or removal;
- Contaminated soil shall be covered with at least six inches of packed uncontaminated soil or other TPH-non-permeable barrier, such as plastic tarp. No headspace shall be allowed where vapors could accumulate;
- Covered piles shall be designed in such a way to eliminate erosion due to wind or water. No openings in the covers are permitted;
- During soil excavation, odors shall not be evident to such a degree as to cause a public nuisance; and,
- Clean soil must be segregated from contaminated soil.

Residual Impacts

With implementation of the recommended mitigation measures, residual impacts are anticipated to be less than significant.

5.7.4.3 LUO/LUE Amendment Impacts

The proposed LUO/LUE amendments would include the re-designation of approximately 44.7-acres of land currently designated as Commercial Service to the Industrial uses, re-designation of approximately 9.3-acres of land currently designated as Residential Suburban to Industrial use category. The following analysis evaluates the types of land uses that would be allowed under the proposed land use designation and the potential hazardous materials/waste issues associated with these land uses. Table 3-2 presents a list of allowable uses that could be permitted under the proposed land use designation changes. For purposes of this analysis, impacts are assessed using existing conditions as the baseline condition.

As listed above in Section 5.5.3 – Regulatory Setting, there are a variety of existing regulations that will be applicable to possible proposed land uses allowed in the Industrial use category. These uses range from manufacturing of finish products, vehicle and equipment services, fueling and repair, and agricultural related industries. The proposed allowable uses for the LUO/LUE amendment area could include a range of hazardous materials and/or wastes, including, flammable liquids and gasses, toxic substances, pesticides, fuels, and medical and/or infectious wastes.

Any proposed land uses that would handle or store hazardous materials over reportable quantities (e.g. 55 gallons) would be required to submit hazardous materials business plans to the County CUPA. Any proposed facilities with aboveground or underground storage tanks would be required to comply with federal and state AST and UST regulations for secondary containment and leak prevention. Facilities using paints, varnishes or coatings would be required to obtain proper permits from the APCD. Any industrial wastewater discharges would be required to be permitted through the NPDES permitting system administered by the RWQCB. Facilities generating hazardous wastes would be required to appropriately package and ship the wastes to a licensed hazardous waste disposal or treatment facility. Any facilities, such as veterinary hospitals, or animal confinement facilities may generate infectious wastes that would be required to be removed by a licensed transporter and disposed or incinerated off-site.

The following impact analysis is presented to address special circumstances that may result from the proposed LUO/LUE amendment:

Impact HAZ-5: Due to the LUO/LUE amendment area's presence within a 100-year floodplain, hazardous materials could be released during a significant storm event.

Discussion: The proposed LUO/LUE amendment area allowable uses may include the use of various hazardous materials. In the event of a significant storm event, these materials could be released if not properly stored. The allowable facilities would be required to submit a Hazardous Materials Business Plan with the County CUPA, as required by state law. The Hazardous Materials Business plans are required to include a site map showing hazardous materials storage areas, an emergency response plan, a spill response plan, and an emergency evacuation plan.

Impact Category: Significant but Mitigable

Thresholds of Significance Criteria: 1, 2

Mitigation Measure HAZ-5:

- A. Future industrial development within the LUO/LUE amendment area shall implement Mitigation Measure HAZ-3; and,
- B. In accordance with the County's Land Use Ordinance, Title 22, Section 22.14.060(D)(2), propane tanks, ASTs, and USTs installed within the LUO/LUE Amendment area shall be provided with anchoring to prevent the tank from being washed away during a flooding event at the project site.

Residual Impacts

With implementation of the recommended mitigation measures, residual impacts are anticipated to be less-than-significant.

5.7.4.4 Remaining Hazards Issue Areas

The proposed project is not within one-quarter mile of an existing or proposed school. The project site is not included on the Cortese list of hazardous materials sites. The project site is not located within the regulated area of an adopted airport land use plan, or within two miles of a public airport or private airstrip. The project site is located adjacent to Highway 101, and would not impair the implementation of or interfere with an adopted emergency response or evacuation plan. The project site is located within an area of moderate fire hazard, as shown on the County of San Luis Obispo's Natural Hazard Disclosure Maps – Fire Hazard Map (<http://landarch.larc.calpoly.edu/slocounty/nhd.htm>).

5.7.4.5 Cumulative Impacts

The proposed asphalt plant and LUO/LUE amendments comprise the majority of the land within the existing industrial area. As such, the analysis is cumulative in nature. No significant cumulative impacts were identified.

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