15. PUBLIC HEALTH AND SAFETY

This EIR chapter describes known and potentially public health and safety conditions in the plan area and vicinity (including hazardous materials), related potentially significant adverse public health impacts anticipated with implementation of the proposed Specific Plan, and associated mitigation needs.

Note: Known and potential wildfire conditions in the plan area and vicinity, and related Specific Plan impacts and mitigation needs, are described in the next chapter of this EIR, 16. Public Services and Utilities, subsection 16.6, Fire Protection and Emergency Medical Services.

15.1 SETTING

15.1.1 General Concerns

For purposes of this EIR, "hazardous materials" are defined as substances with certain chemical and physical properties that could pose a substantial present or future hazard to human health or the environment if improperly handled, stored, disposed, or otherwise managed.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. For example, in the plan area vicinity, spraying of agricultural crops near residential areas is a potential concern.

Construction workers typically have the greatest risk of exposure to contaminated soil or groundwater. If contamination at a site remains undetected, workers and the public may be at risk of exposure if precautions are not taken during site development. Accidents or spills during transport of hazardous materials or wastes can also expose the general public and the environment to these substances.

15.1.2 Soil/Groundwater Contamination Potential

The plan area and surrounding properties have historically been used for agricultural purposes. Chemicals used in some agricultural activities have the potential to linger in soil and groundwater. Several herbicides and insecticides classified by the California Department of Food and Agriculture as potentially injurious to humans are used in Solano County for weed control and for pest control in vineyard, orchard, and row crop lands. The County regulates the use of these chemicals through the permitting process (see further discussion under subsection 15.2.1, Regulatory Agencies, below).[1]

[1]EDAW, Solano County Draft General Plan Draft Environmental Impact Report, April 18, 2008, page 4.13-1.

In addition, there may be sites in the plan area vicinity where hazardous materials are generated, stored, handled, and/or treated, including sites of existing and past industrial uses, gas stations, auto repair enterprises, and other land uses that use, store, or dispose of hazardous materials and wastes. It is possible that underground storage tanks in the vicinity have leaked, or that fuel spills have occurred around above- or below-grade fuel storage tanks. These types of occurrences could result in contamination of soil and/or groundwater in the vicinity. In addition, past transport, handling, and storage of fuels and other hazardous materials associated with such uses may have resulted in soil or groundwater contamination in the vicinity. If fuel spills or leaks have occurred and soil or groundwater is contaminated, construction workers could be exposed to contamination in the short term during site preparation work.

15.1.3 Asbestos, PCB, and Lead-Based Paint Potential

Existing older buildings in the plan area could contain asbestos, polychlorinated biphenyls (PCBs), and/or lead-based paint.

(a) Asbestos. The presence of asbestos in a building does not necessarily mean that the building poses a health hazard. In many cases, asbestos within buildings is inaccessible or sealed within another material, and thus unable to cause a health hazard. However, asbestos fibers can be released during building renovation or demolition, unless proper precautions are taken.

The adverse health effects associated with asbestos exposure have been extensively studied. Studies have demonstrated that inhalation of asbestos fibers may lead to increased risk of developing respiratory or abdominal cancers. There is no known safe level of exposure.

The removal, handling, transport, and disposal of asbestos are heavily regulated at the federal, state, and local levels. These regulations are designed to minimize any exposure of on-site employees (e.g., construction workers) and the general public to asbestos. The U.S. Environmental Protection Agency (EPA) provides asbestos standards. The federal Occupational Safety and Health Administration (OSHA) and its state counterpart, CalOSHA, regulate various aspects of asbestos removal, handling, and disposal to ensure worker safety. Transport and disposal of asbestos-containing material is also regulated.

(b) PCBs. PCBs are another potentially hazardous class of compounds commonly found in the electrical transformers in older commercial buildings. While manufacture of PCBs has been banned since 1977, some older pieces of equipment may still contain PCBs.

(c) Lead-Based Paint. Lead is a heavy, toxic metal. Lead-based paint was commonly used before 1960 and banned in 1979. It is assumed to be present in many older buildings in the plan area vicinity.

15.2 PERTINENT PLANS AND POLICIES

CEQA requires an EIR to identify the plan and policy setting within which the project is proposed and discuss any inconsistencies between the proposed project and these applicable plans and policies adopted to minimize environmental impacts [CEQA Guidelines sections 15124(b) and

15125(d)]. Adopted federal, state and local policies, regulatory requirements and jurisdictional authority pertinent to consideration of the potential public health and safety impacts of the proposed Specific Plan are described below.

15.2.1 Regulatory Agencies

The following federal, state, regional, and local agencies have regulatory authority for the handling and management of hazardous materials/wastes within Solano County.

(a) Environmental Protection Agency. The Environmental Protection Agency (EPA), Region IX, regulates chemical and hazardous materials use, storage, treatment, handling, transport, and disposal practices; protects workers and the community (along with CalOSHA--see below); and integrates the federal Clean Water Act and Clean Air Act into California legislation.

(b) Federal Occupational Health and Safety Administration. The federal Occupational Health and Safety Administration (OSHA) establishes and enforces regulations related to health and safety of workers exposed to toxic and hazardous materials. In addition, OSHA sets health and safety guidelines for construction activities and manufacturing facility operations.

(c) California Occupational Safety and Health Administration. The California Occupational Safety and Health Administration (CalOSHA) is responsible for promulgating and enforcing health and safety standards and implementing federal OSHA laws.

(d) State of California Water Quality Control Board. The Regional Water Quality Control Board (RWQCB), San Francisco Region, protects surface and groundwater quality from pollutants discharged or threatened to be discharged to the waters of the state. The RWQCB issues and enforces National Pollutant Discharge Elimination System (NPDES) permits.

(e) California Department of Toxic Substances Control. The California EPA, Department of Toxic Substances Control, regulates hazardous substances and wastes, oversees remedial investigations, protects drinking water from toxic contamination, and warns public exposed to listed carcinogens.

(f) Bay Area Air Quality Management District. The Bay Area Air Quality Management District (BAAQMD) is responsible for the permitting of industrial air emissions and sets and enforces air quality standards.

(g) Solano County. The Solano County Department of Resource Management is the certified unified program agency (CUPA) for all cities and unincorporated areas in Solano County. As the CUPA, the department conducts permitting and inspection of businesses that handle hazardous materials or wastes and responds to complaints of illegal disposal of hazardous wastes.

The Solano County Agriculture Department uses the CUPA permitting process to reduce exposure and injury from agricultural pesticide and herbicide application. The process requires that applicants use only approved pesticides and herbicides in the specified manner and

ensures that sensitive receptors such as hospitals, schools, sensitive crops, and sensitive habitats are avoided.[1]

The County also manages public health and safety through implementation of various Solano County General Plan policies and programs, listed in subsection 15.2.2 below.

15.2.2 Solano County General Plan

Those policies and implementation programs from the 2008 Solano County General Plan that are pertinent to consideration of proposed Specific Plan and its potential public health and safety impacts are listed below. Where any proposed Specific Plan land use and development policy or standard is found in this EIR to be potentially inconsistent with one or more of these County-adopted public health and safety goals, policies or implementation programs, a potentially significant environmental impact and one or more associated mitigations will be identified for incorporation into the Specific Plan to reduce the impact and better implement the General Plan. Otherwise, the proposed Specific Plan will be considered consistent with the public health and safety goals, policies, and implementation programs listed below.

- *Promote patterns of development that encourage physical activity to reduce obesity, cardiovascular disease, asthma, diabetes, or injury; and that contribute to a "sense of place" and emotional well-being.* (Policy LU.P-34)

- *Promote land use decisions that reduce injuries (pedestrian, bicycle, and motor vehicle crashes), and provide access to healthy food choices, including locally grown fresh fruits and vegetables throughout the county.* (Policy LU.P-36)

- *Provide for detailed land planning through the Specific Project Area land use designation and subsequent planning process. Where specific plans and policy plan overlays are required before development in these areas, these plans shall determine:*

    - *resource or hazard areas to be avoided by development;…*(Implementation Program LU.I-6)

- *Work to reduce the health risks associated with naturally occurring hazardous materials such as radon, asbestos, or mercury.* (Policy HS.P-27)

- *Follow recommended protocol from the California Department of Conservation, Geologic Survey, U.S. Occupational Safety and Health Administration, and other applicable agencies for reducing risks associated with naturally occurring hazardous materials with new development.* (Implementation Program HS.I-34)

- *Integrate public health concerns into land use planning and decision making.* (Policy HS.P-38)

- *Promote the use of healthy building materials such as low toxicity paint and nontoxic carpeting.* (Implementation Program HS.I-44)

[1]EDAW, Solano County Draft General Plan Draft Environmental Impact Report, April 18, 2008, pages 4.13-1 through 4.13-2.

15.2.3 Right-to-Farm Ordinance

Chapter 2.2 of the Solano County Code protects farm operations from nuisance complaints associated with residential uses located next to active agricultural operations. Such complaints can cause farm operators to cease or curtail operations, and can also deter additional investment in farm-related improvements that support the county's agriculture economy. The County's "right-to-farm ordinance," as it is commonly known, guarantees existing farm owners the right to continue agricultural operations, including, but not limited to, cultivating and tilling the soil, burning agricultural byproducts, irrigating, raising crops and/or livestock, and applying approved chemicals in a proper manner to fields and farmland. The ordinance limits the circumstances under which agriculture may be considered a nuisance. To prevent future conflicts, notice of this ordinance is required to be given to purchasers of real property in the county.

15.3 IMPACTS AND MITIGATION MEASURES

15.3.1 Significance Criteria

Based on the CEQA Guidelines, the proposed Specific Plan would be considered to have a significant impact if it would directly or indirectly:[1]

(a) create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

(b) 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;

(c) emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

(d) be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, create a significant hazard to the public or the environment; or

(e) impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Criterion (e), regarding interference with emergency response or evacuation plans, is addressed in chapter 16, Public Services and Utilities, of this EIR.

15.3.2 Relevant Project Characteristics

As described in chapter 2, Project Description, of this EIR, the Specific Plan proposes a mix of agriculture, open space, housing, community services, and certain limited commercial uses (neighborhood commercial, agricultural tourism) in the Specific Plan area. The Specific Plan

[1] CEQA Guidelines, Appendix G, items VII(a) through VII(d) and VII(g).

contains a policy (OL-11) to "provide appropriate buffers and transition areas to agriculture lands to reduce operational conflicts between residential and agricultural areas."

Development in accordance with the Specific Plan would also include installation of roads and other infrastructure, which may include an onsite groundwater well system and/or an onsite wastewater collection and treatment system. The Specific Plan also includes a designated 10-acre site in the northwestern corner of Nightingale Neighborhood for future accommodation of an elementary school. (See further discussion in chapter 2, Project Description, and chapter 16, Public Services and Utilities, of this EIR.)

15.3.3 Impacts and Mitigation Measures

Potential Exposure to Existing Hazardous Materials Contamination. The Specific Plan area and surrounding vicinity may contain areas of contamination from past agricultural pesticide use or other sources that could pose a safety hazard for workers, residents, school children, or other occupants of the plan area. As discussed in subsection 15.1.2 above, the plan area and surrounding properties have historically been used for agriculture and therefore may contain chemical residues from agricultural activities. In addition, past or current handling of other types of hazardous materials within the plan area and vicinity may have created soil and/or groundwater contamination, resulting in potential short-term hazards to construction workers during site preparation work. There is always a small possibility that project construction could encounter contamination and expose construction workers to existing spilled, leaked, or otherwise discharged hazardous materials or wastes.

Each developer of a site in the Specific Plan area would be required to comply with all applicable existing state- and county-mandated site assessment, remediation, removal, and disposal requirements for soil, surface water, and/or groundwater contamination. In particular, these include the requirements of Solano County, the Regional Water Quality Control Board (RWQCB), and the California Department of Toxic Substances Control (DTSC). Compliance with these established requirements would be expected to assure that this possible health and safety impact would be ***less-than-significant***.

Typically, implementation of these measures would involve the following steps:

(a) Soil Contamination. In order to mitigate potential health hazards related to construction personnel or future occupant exposure to soil contamination, developers would complete the following steps for each site proposed for disturbance as part of a Specific Plan-facilitated construction activity in the plan area:

Step 1. Investigate the site to determine whether it has a record of hazardous material discharge into soils, and if so, characterize the site according to the nature and extent of soil contamination that is present before development activities proceed at that site.

Step 2. Based on the proposed activities associated with the future project proposed, determine the need for further investigation and/or remediation of the soils conditions on the contaminated site. For example, if the area is slated for commercial land use, the majority of the site would be paved and there would be little or no contact with contaminated soil. Industrial cleanup levels would likely be applicable. If the slated development activity could involve human contact with soils, such as may be the

case with residential or school use, then Step 3 should be completed. If no human contact is anticipated, then no further mitigation is necessary.

Step 3. If it is determined that extensive soil contact would accompany the intended use of the site, undertake a Phase II investigation, involving soil sampling at a minimum, at the expense of the property owner or responsible party. Should further investigation reveal high levels of hazardous materials in the site soils, mitigate health and safety risks according to Solano County Department of Resource Management and Regional Water Quality Control Board (RWQCB) regulations. This would include site-specific health and safety plans prepared prior to undertaking any building or utility construction. Also, if buildings are situated over soils that are significantly contaminated, undertake measures to either remove the chemicals or prevent contaminants from entering and collecting within the building. If remediation of contaminated soil is infeasible, a deed restriction would be necessary to limit site use and eliminate unacceptable risks to health or the environment.

(b) Surface or Groundwater Contamination. In order to reduce potential health hazards due to construction personnel or future occupant exposure to surface water or groundwater contamination, developers would complete the following steps for each site proposed for disturbance as part of a Specific Plan-facilitated construction activity in the plan area:

Step 1. Investigate the site to determine whether it has a record of hazardous material discharge into surface or groundwater, and if so, characterize the site according to the nature and extent of contamination that is present before development activities proceed at that site.

Step 2. Install drainage improvements in order to prevent transport and spreading of hazardous materials that may spill or accumulate onsite.

Step 3. If investigations indicate evidence of chemical/environmental hazards in site surface water and/or groundwater, then mitigation measures acceptable to the RWQCB would be required to remediate the site prior to development activity.

Step 4. Inform construction personnel of the proximity to recognized contaminated sites and advise them of health and safety procedures to prevent exposure to hazardous chemicals in surface water/groundwater.

Mitigation for Potential Exposure to Existing Hazardous Materials Contamination. No significant additional adverse impact has been identified; no additional mitigation is required.

Impact 15-1: Future Storage and Use of Agricultural Chemicals. In all four Draft Specific Plan-designated neighborhoods, the plan would permit residential development adjoining agricultural uses, some of which may store and/or use pesticides or other hazardous substances. Agricultural uses allowed by the Draft Specific Plan would also adjoin certain offsite residential areas, such as the upper Green Valley neighborhood north of the Specific Plan area and the Hidden Meadows subdivision south of the plan area. In addition, in the proposed Nightingale Neighborhood, the Specific Plan would also allow development of an elementary school in the northwestern corner of the neighborhood, close to but not adjoining agricultural areas. The potential exposure of residents or other site occupants to pesticides or other hazardous substances used in agriculture would represent a ***potentially significant impact*** (see criteria [a] through [c] under subsection 15.1.3, "Significance Criteria," above).

Hazardous substances may be stored and/or used in association with agricultural uses permitted or facilitated by the Specific Plan. In some portions of the plan area, existing or future agricultural uses may be located next to or near residential neighborhoods, creating the potential for residents to be exposed to hazardous materials. Specifically:

- In the Green Valley Road Corridor Neighborhood, housing in the *Rural Farm* (RF) and *Agriculture-Residential* (AG-R) designations would adjoin *Agriculture-Preserve* (AG-P) areas;

- In the Elkhorn and Three Creeks neighborhoods, housing in the *Rural Neighborhood* (RN), *Rural Farm* (RF), and *Agriculture-Residential* (AG-R) designations would adjoin *Agriculture-Preserve* (AG-P) and *Agriculture-Watershed* (AG-WS) areas; and

- In the Nightingale Neighborhood, housing in the *Rural Neighborhood* (RN) and *Agriculture-Residential* (AG-R) designations would adjoin *Agriculture-Preserve* (AG-P) and *Agriculture-Watershed* (AG-WS) areas. The Specific Plan also includes a designated 10-acre site in the northwestern corner of Nightingale Neighborhood for future accommodation of an elementary school, but this school site (designated *Community Services* [CS] by the Specific Plan) would not immediately adjoin agricultural areas.

The Specific Plan contains a policy (OL-11) to "provide appropriate buffers and transition areas to agriculture lands to reduce operational conflicts between residential and agricultural areas" but does not specify a buffer width or contain other provisions protecting residents from agricultural chemicals.

Future plan area occupants may also be exposed to accidental spillage or leakage of hazardous materials stored by commercial uses allowed within the plan area, but this risk would be small given the limited number of proposed commercial areas and the fact that the types of commercial uses allowed (e.g., small-scale retail) would not use substantial amounts of hazardous materials.

Mitigation 15-1. As an amendment to the proposed Specific Plan (Policy OL-11) and/or as part of the proposed Resource Management Plan and/or Agricultural Business Plan, the County shall require a minimum 200-foot-wide buffer between residential and school uses and agricultural properties within and adjoining the Specific Plan area. In addition, the County shall ensure that agricultural operators within the Specific Plan area comply with all applicable local, state, and federal regulations regarding hazardous materials, including Solano County General Plan provisions, Solano County Code requirements, and the permitting processes of the Solano County Department of Resource Management and Solano County Agriculture Department. These measures would reduce the impact to a ***less-than-significant level.***

Other jurisdictions, such as Contra Costa County and Mendocino County, have required buffers of 200 to 500 feet between agricultural uses and urban uses. These buffers supplement other requirements, including restrictions such as those imposed by the Solano County Agriculture Department on agricultural spraying near residential areas.[1]

All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state, and federal regulations. Some of these regulations may include posting of signs, Fire District notification, and specialized containment facilities.

The County would require all agricultural and commercial uses within and adjoining the plan area to follow applicable regulations and guidelines regarding the storage and handling of hazardous materials, including General Plan and County Code requirements and the permitting processes of the Solano County Department of Resource Management and the Solano County Agriculture Department (see subsection 15.2 above). These established measures would help to reduce the potential for health and safety effects associated with potential exposure to agricultural chemicals and other hazardous materials.

Potential Asbestos and PCB Exposure. If development in accordance with the Specific Plan includes alteration, renovation, or demolition of existing structures in the plan area, removal or disturbance of asbestos-containing material (ACM) and/or transformers could expose construction workers and the general public to friable asbestos and/or PCBs. Therefore, as a condition of Specific Plan-facilitated alteration, renovation, or demolition permit approval for buildings within the plan area, the County would routinely require project applicants to coordinate with the Bay Area Air Quality Management District (BAAQMD) to determine if asbestos or PCBs are present.

Ensuring proper identification and removal of ACM and/or PCBs requires each project applicant to complete the following steps:

Step 1. Thoroughly survey the project site and existing structures for the presence of asbestos-containing material. The survey shall be performed by a person who is

[1]Leonard Charles and Associates, Southwest Dixon Specific Plan Draft Environmental Impact Report, prepared for the City of Dixon, April 2003, pages 204-208.

properly certified by OSHA and has taken and passed an EPA-approved building inspector course.

Step 2. If building elements containing any amount of asbestos are present, prepare a written Asbestos Abatement Plan describing activities and procedures for removal, handling, and disposal of these building elements using the most appropriate procedures, work practices, and engineering controls.

Step 3. Provide the asbestos survey findings, the written Asbestos Abatement Plan (if necessary), and notification of intent to demolish to the Solano County Department of Resource Management at least ten days prior to commencement of demolition.

Step 4. Remove any on-site transformers prior to demolition of non-residential buildings.

Implementation of these required measures would be expected to reduce the potentially significant health and safety impacts associated with asbestos removal and PCBs to a ***less-than-significant level***.

Mitigation for Potential Asbestos and PCB Exposure. No significant adverse impact has been identified; no additional mitigation is required.

Potential Lead-Based Paint Exposure. If lead-based paint is present and has delaminated (split into thin layers) or chipped from surfaces, airborne lead particles could be released during Specific Plan-facilitated alteration, renovation, or demolition of existing structures within the plan area. CalOSHA regulations would be applied, and each individual, site-specific project applicant would implement the following procedures in accordance with those CalOSHA regulations:

- Notify the Solano County Department of Resource Management prior to starting work, describing the nature, location, and schedule of the work;
- Post a sign at all work locations where lead containment is required, stating that lead-based paint abatement is in progress and public access is prohibited;
- Notify the tenant(s) where the lead-based paint abatement work will be performed on a residential property occupied by one or more tenants; and
- Notify the property owner when work on a residential project will disturb lead-based paint.

Lead abatement performance standards are included in the *Guidelines for Evaluation and Control of Lead-Based Paint Hazards* (U.S. Department of Housing and Urban Development). Accordingly, HEPA vacuums may be required for abrasive blasting, water blasting, scraping, or sanding. Burning, torching, and similar activities are prohibited. Following completion of lead-based paint abatement, all visible lead-based paint particles must be removed from the site.

The Department of Resource Management may inspect lead-based paint abatement activities at any time during construction. The Department of Resource Management is also responsible for addressing citizen complaints related to lead-based paint abatement activities and may issue a Notice of Violation, a Stop Work order, or a fine.

Implementation of the regulations outlined above would result in a ***less-than-significant impact*** associated with lead-based paint exposure.

Mitigation for Potential Lead-Based Paint Exposure. No significant adverse impact has been identified; no additional mitigation is required.

Impact 15-2: Hazardous Materials from Proposed Onsite Wastewater Treatment Plant (Wastewater Options B and C). Operation of the proposed wastewater treatment plant within the Specific Plan area under proposed Wastewater Option B (Onsite Treatment) and Wastewater Option C (Fairfield-Suisun Sewer District Connection/Onsite Treatment Combination) would involve regular handling, use, and disposal of hazardous materials and wastes during the course of normal operations. In addition, the onsite wastewater treatment plant would create the potential for release of raw or treated sewage or other stored hazardous materials through mishandling or an emergency situation. These potential hazards would represent a ***potentially significant impact*** (see criteria [a] through [c] under subsection 15.1.3, "Significance Criteria," above).

Under proposed wastewater service Options B and C, wastewater from the Specific Plan development areas would be collected and treated onsite, with collected wastewater conveyed to an onsite Membrane Bioreactor (MBR) package wastewater treatment plant that would treat the collected wastewater to tertiary recycled water standards. The tertiary treated wastewater would then be reused onsite for agricultural irrigation, ornamental landscaping irrigation, park and playing field landscaping irrigation, toilet flushing, and other jurisdictionally permitted uses. The Specific Plan proposes to treat all collected wastewater to County and State tertiary cycled water standards.

Operational issues associated with wastewater treatment plants are routinely addressed through an established federal, state, and local regulatory structure. However, the Specific Plan-proposed Master Wastewater Plan for Options B and C, including engineering specifications for the onsite treatment system, has not yet been completed and the associated recycled wastewater reuse aspect has not yet been approved by the Regional Water Quality Control Board (RWQCB) or California Department of Public Health (CDPH). (See further discussion in *Impact 16-5* in chapter 16, Public Services and Utilities, of this EIR.)

Mitigation 15-2. Implement *Mitigation 16-5*. In addition, after the wastewater treatment plant and associated collection system have been installed, the County shall confirm that a full environmental regulatory compliance review has been conducted to verify that, based on the actual equipment stalled and specific quantities of hazardous materials handled, used, and disposed, the facility is operating in compliance with applicable environmental laws and regulations. These measures would reduce the impact to a ***less-than-significant level.***

Cumulative Public Health and Safety Impacts. In addition to development allowed by the Specific Plan, other development unrelated to the Specific Plan would continue to occur elsewhere in the county and subregion, cumulatively increasing the number of people potentially exposed to hazardous materials. It is unlikely, however, that hazardous materials risks associated with other development in the county or subregion would combine with those associated with the Specific Plan. In addition, implementation of the policies, regulations, and mitigation measures described in this EIR chapter would ensure that impacts associated with the Specific Plan would be reduced to less-than-significant levels. For these reasons, cumulative public health and safety impacts are considered ***less-than-significant*** and no mitigation measures are required.

Mitigation for Cumulative Public Health and Safety Impacts. No significant impact has been identified; no mitigation is required.