

7. SAFETY ELEMENT

A. Purpose

The Safety Element, pursuant to Government Code Section 65302(g), deals with the protection of the community from unreasonable risks associated with the effects of earthquakes, landslides, slope instability, subsidence, other geologic hazards, flood, and fire. Maps identifying earthquake hazards, unstable soil hazards, landslide hazards, and flood zones are included in this element.

The geology, topography, soils, hydrology, and fire risk of Fort Bragg pose numerous constraints on future development. This element guides land use planning and policy decisions in order to achieve an acceptable level of public protection.

B. Seismic Safety and Geologic Hazards

There are no active earthquake faults in the City. However, the San Andreas fault is located approximately 9 miles to the west, and the Maacama fault is 22 miles to the east. Major earthquakes can occur on these faults. Seismic activities can cause major disruptions of the City's transportation and emergency services network. Should the Pudding Creek, Noyo River, and/or Hare Creek Bridges become unusable following a seismic event, people may not be able to evacuate, and emergency access would be blocked. Potential hazards associated with earthquakes include: rupture of the ground surface by displacement along faults, shaking of the ground caused by the passage of seismic waves through the earth, ground failure induced by shaking, such as landslides, liquefaction and subsidence of unstable ground, and tsunamis.

Non-seismic geologic hazards include the presence of unstable soils on steep slopes and expansive soils which, in the presence of moisture, will swell and shrink when returning to a dry condition. Map SF-1: Geologic Hazards identifies areas of potential landslides.

C. Flooding

Portions of the City have areas subject to potential flooding during severe storms. Because of the generally flat terrain in the Fort Bragg area, a 100-year storm could exceed the ability of the City's infrastructure to move runoff water from the City to outfalls into natural drainageways and the ocean. This drainage overload may result in standing water in low areas. High tides and severe storms may also cause flooding in low-lying areas near creeks and drainages.

Map SF-2: Flood Hazards shows areas within the 100-year floodplain. Within floodplains established by the Federal Emergency Management Agency (FEMA), property owners may be required to obtain flood insurance as a condition of mortgage approval. The areas subject to flooding are shown on maps called the Flood Insurance Rate Maps (FIRM) that are prepared by FEMA. The City participates in the FEMA flood insurance program, which allows property owners to obtain subsidized insurance rates.

FEMA also requires the City to establish development standards for construction in the 100-year floodplain. Typically the standards developed by a city or county can range from limits on the intensity of development to requirements to raise the "habitable floor" of the structure to at least one foot above the 100-year flood peak elevation. The majority of the City is situated in "Zone X" which is above both the 100-year and the 500-year floodplains.

D. Fire Protection

In 1991, the City of Fort Bragg and the Fort Bragg Rural Fire District entered into an agreement creating the Fort Bragg Fire Protection Authority. The Authority has primary fire protection responsibility within the City limits and/or developed lands within the District (the District includes all of the City's Sphere of Influence). In addition to normal fire calls, the Fort Bragg Fire Protection Authority has increasingly been called to assist with accidents, hazardous material spills, medical calls, and to provide personnel and equipment for large wildfires outside of the area. The California Department of Forestry and Fire Protection (CDFFP) has responsibility for wildland fires within the Planning Area. The Draft EIR presents a complete description of staffing, response time, calls for assistance, and other factors related to the Fire Protection Authority. The primary constraints or issues involving the Fire Protection Authority concern adequate staffing, adequate equipment, and adequate fireflow to structures.

E. Police Protection

Within the City, the Fort Bragg Police Department has primary responsibility for police response. The constraint to providing adequate police response involves the need to ensure that the City hires sufficient staff to meet the response needs of both the existing and future population.

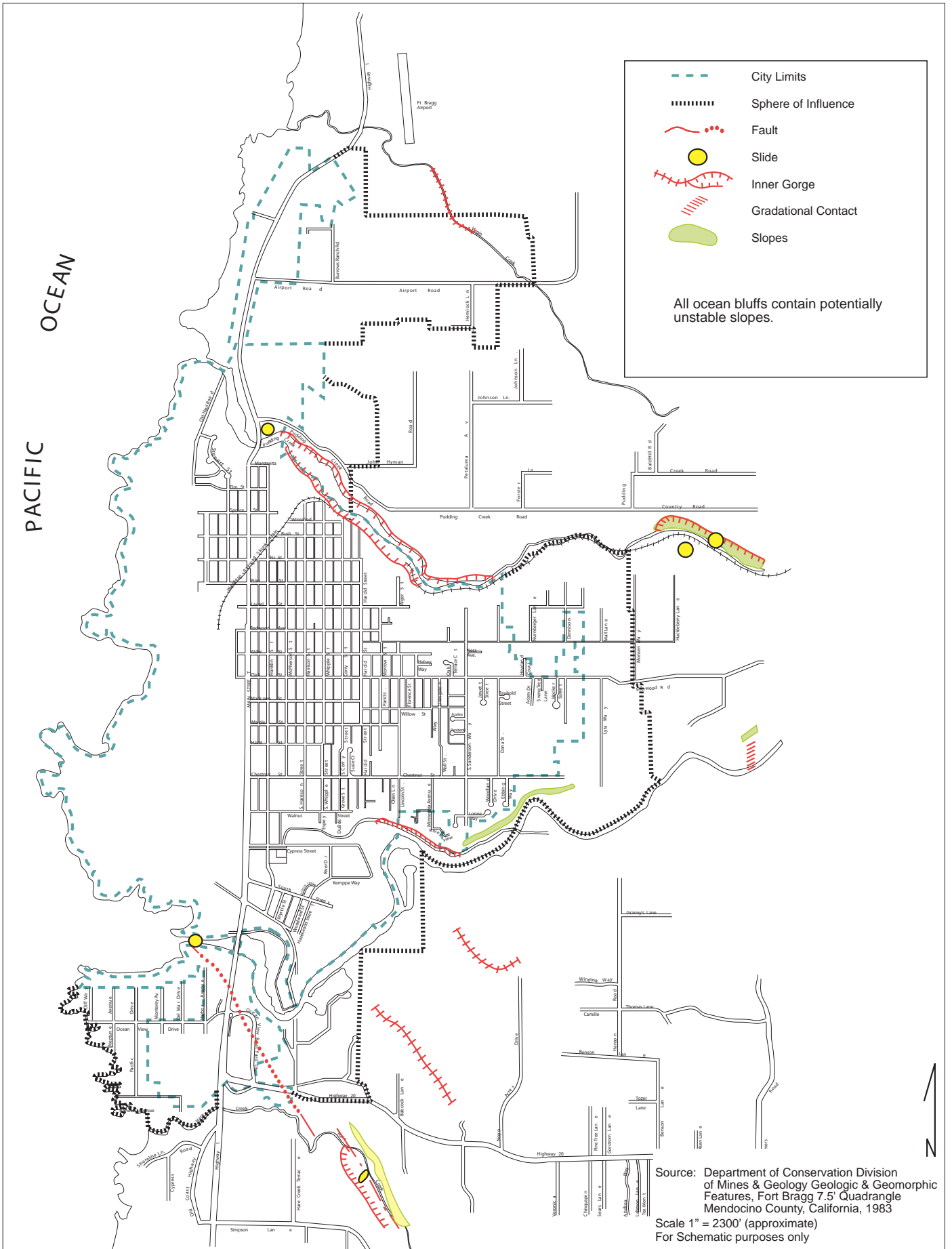
F. Emergency Preparedness

California State Law requires that all cities and counties adopt an Emergency Plan. The purpose of this plan is to outline policies and procedures with respect to significant events occurring within or threatening the community which would require the deployment of extraordinary resources for the protection of life and property.

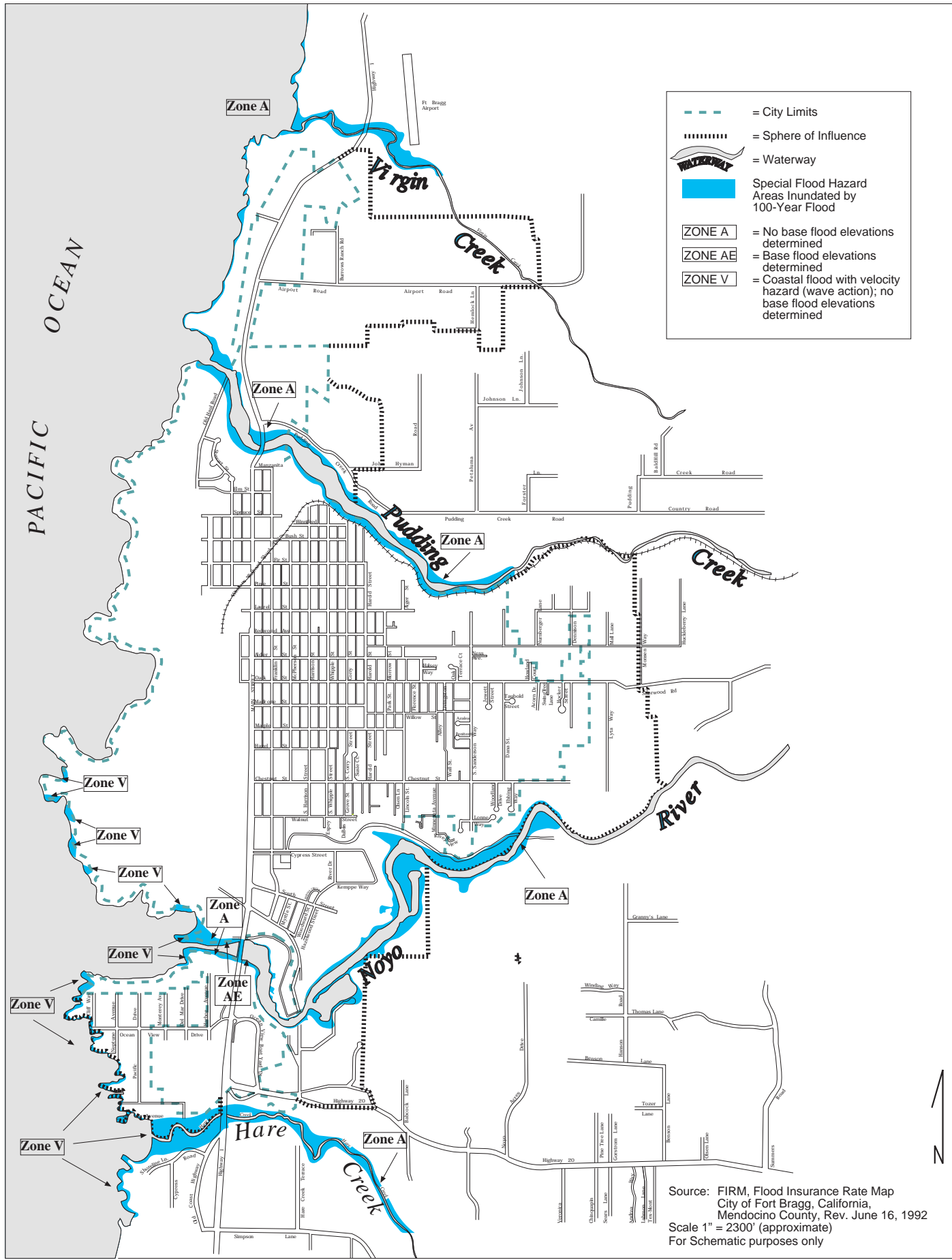
The City has an adopted *Emergency Operations Plan*. The purpose of this plan is to ensure that the City will be prepared to respond effectively in the event of emergencies to save lives, restore and protect property, repair and restore essential public services, and provide for the storage and distribution of medical, food, water, shelter sites, and other vital supplies to maintain the continuity of government.

The Mendocino Emergency Services Authority (MESA), a joint powers organization that includes the County of Mendocino and the incorporated cities within the county, serves as the coordinating agency for mutual aid services provided by fire departments, law enforcement agencies, and emergency medical service providers throughout the county. In addition, MESA reviews and makes recommendations regarding emergency operation plans for public and private institutions where pre-planning for emergency procedures is advisable. Coordination of emergency services and planning guidelines is provided for situations including flood, wildland fires, structure fires, explosions, hazardous material spills, severe weather, and earthquakes.

Map SF-1 GEOLOGIC HAZARDS



Map SF-2 Flood Hazards



G. Other Hazards

1. Hazardous Materials

Various types of chemicals and other potentially hazardous materials are used by Fort Bragg industries and businesses. Other hazardous substances are transported to and through Fort Bragg. Finally, residents use various hazardous materials for landscaping, cleaning, and other residential uses. Improper transport, storage, or use of these substances can result in releases to the environment with consequent impacts on human health and the environment.

The Mendocino Solid Waste Management Authority operates a hazmobile that serves the City. The Fire Protection Authority maintains a hazardous materials unit behind the main fire station. This unit is used to respond to hazardous waste spills.


2. Electromagnetic Radiation

The potentially adverse health effects of electromagnetic fields (EMF) from electrical transmission lines, substations, and appliances have been documented in many studies. However, there is no consensus in the scientific community regarding the degree of risk posed by EMFs. It is not known what levels of exposure to EMFs are safe. The approach taken to this potential health hazard is one of prudent avoidance – establishing reasonable regulation before electrical transmission lines are built and discouraging sensitive development from encroaching in or near electrical transmission line rights-of-way.

3. Air Quality

Emissions of pollutants from motor vehicles, industrial uses, and other sources can be injurious to people's health. Policies and programs to protect the City's air quality are included in the Conservation, Open Space, and Parks Element.

H. Goals, Policies, and Programs

The following policies demarcated with the Fort Bragg City seal:  are not part of the certified LCP and do not govern the review and approval of coastal development permits: Policy SF-4.2, Policy SF-5.3, Policy SF-5.4, Policy SF-6.1, Policy SF-6.2, Policy SF-7.1, Policy SF-7.2, Policy SF-9.1, and Policy SF-9.2.

Goal SF-1 Reduce and minimize impacts of development on blufftops and shoreline features.

Policy SF-1.1 Minimize Hazards: New development shall: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard; and (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

Policy SF-1.2: All ocean-front and blufftop development shall be sized, sited and designed to minimize risk from wave run-up, flooding, and beach and bluff erosion hazards, and avoid the need for a shoreline protective structure at any time during the life of the development.

Policy SF-1.3: Geotechnical report required. Applications for development located in or near an area subject to geologic hazards, including but not limited to areas of geologic hazard shown on Map SF-1, shall be required to submit a geologic/soils/geotechnical study that identifies all potential geologic hazards affecting the proposed project site, all necessary mitigation measures, and demonstrates that the project site is suitable for the proposed development and that the development will be safe from geologic hazard. Such study shall be conducted by a licensed Certified Engineering Geologist (CEG) or Geotechnical Engineer (GE) and shall be prepared consistent with the requirements of Section 18.54.040(C) of the Coastal Land Use and Development Code. *Refer to Map SF-1: Geologic Hazards. Refer to the General Plan Glossary for definitions of these terms.*

Policy SF-1.4: Blufftop Setback. All development located on a blufftop shall be setback from the bluff edge a sufficient distance to ensure that it will be stable for a projected 100-year economic life. Stability shall be defined as maintaining a minimum factor of safety against sliding of 1.5 (static) or 1.1 (pseudostatic), as described in Section 18.54.040(F) of the Coastal Land Use and Development Code. This requirement shall apply to the principal structure and accessory or ancillary structures. Slope stability analyses and erosion rate estimates shall be performed by a licensed Certified Engineering Geologist or Geotechnical Engineer.

Policy SF-1.5: Siting and design of new blufftop development and shoreline protective devices shall take into account anticipated future changes in sea level. In particular, an acceleration of the historic rate of sea level rise shall be considered. Development shall be set back a sufficient distance landward and elevated to a sufficient foundation height to eliminate or minimize to the maximum extent feasible hazards associated with anticipated sea level rise over the expected 100-year economic life of the structure.

Policy SF-1.6: Land divisions, including subdivisions, lot splits, lot line adjustments, and conditional certificates of compliance which create new shoreline or blufftop lots, shall not be permitted unless the subdivision can be shown to create lots which can be developed without requiring a current or future bluff or shoreline protection structure. No new lots shall be created that could require shoreline protection or bluff stabilization structures at any time.

Policy SF-1.7 Alterations to Landforms: Minimize, to the maximum feasible extent, alterations to cliffs, bluff tops, faces or bases, and other natural land forms in the Coastal Zone. Permit alteration in landforms only if erosion/runoff is controlled and either there exists no other feasible environmentally superior alternative or where such alterations re-establish natural landforms and drainage patterns that have been eliminated by previous development activities.

Program SF-1.7.1: Establish standards in the Coastal LUDC or Grading Ordinance for the alteration and grading of natural landforms taking into account site characteristics, the resulting habitat disturbance, drainage modification, or erosion and sedimentation resulting from vegetation removal.

Policy SF-1.8 Floodplain Development: Limit new development in floodplains in the Coastal Zone, including but not limited to those floodplain areas shown on Map SF-2, to those uses allowed in the Open Space land use designation consistent with all other applicable requirements of the LCP.

Policy SF-1.9 Bluff Face and Bluff Retreat Setback: Prohibit development on the bluff face and within the bluff retreat setback because of the fragility of this environment and the potential for resultant increase in bluff and beach erosion due to poorly-sited development—except that the following uses may be allowed with a conditional use permit:

- (1) engineered accessways or staircases to beaches, boardwalks, viewing platforms, and trail alignments for public access purposes;
- (2) pipelines to serve coastal dependent industry;
- (3) habitat restoration;
- (4) hazardous materials remediation; and
- (5) landform alterations where such alterations re-establish natural landforms and drainage patterns that have been eliminated by previous development activities.

Findings shall be made that no feasible, less environmentally damaging, alternative is available and that feasible mitigation measures have been provided to minimize all adverse environmental impacts. Require as a part of the conditional use permit, a full environmental, geological, and engineering study as specified in Policy LC-6.1. Such structures shall be constructed and designed so as to neither create nor contribute to erosion of the bluff face and to be visually compatible with the surrounding area to the maximum extent feasible.

Policy SF-1.10 Seawalls, Breakwaters and Other Shoreline Structures: Prohibit construction of seawalls, breakwaters, revetments, groins, harbor channels, retaining walls, and other structures altering the natural shoreline processes unless a finding is made that such structures are required: (1) to serve coastal-dependent uses; or (2) to protect public beaches in danger from erosion; or (3) to protect existing structures that were legally constructed prior to the effective date of the Coastal Act; or (4) that were legally permitted prior to the effective date of this Coastal General Plan provided that the CDP did not contain a waiver of the right to a future shoreline or bluff protection structure; or (5) for a development consistent with Section 30233(a) of the Coastal Act and only when it can be demonstrated that said existing structures are at risk from identified hazards if no feasible or less environmentally damaging alternative is available and the structure has been designed to eliminate or mitigate adverse environmental impacts, including impacts upon local shoreline sand supply. The design and construction of allowed protective structures shall respect natural landforms and provide for lateral beach access.

“Existing structures” for purposes of Policy LC-6.5 shall consist only of a principle structure, e.g. residential dwelling, required garage, or second residential unit, and shall not include accessory or ancillary structures such as decks, patios, stairs, landscaping, etc.

Goal SF-2 Reduce seismic and geologic-related hazards.

Policy SF-2.1 Seismic Hazards: Reduce the risk of loss of life, personal injury, and damage to property resulting from seismic hazards.

Program SF-2.1.1: Continue to comply with the provisions of the State Alquist-Priolo Act.

Program SF-2.1.2: Require measures to mitigate potential seismic hazards for structures as conditions of project approval.

Program SF-2.1.3: Monitor and review existing critical, high priority buildings to ensure structural compliance with seismic safety standards.

Program SF-2.1.4: Provide information to the public on ways to reinforce buildings to reduce damage from earthquakes and what to do in the event of an earthquake.

Program SF-2.1.5: Provide information to educate the public about the availability and the benefits of obtaining earthquake insurance.

Program SF-2.1.6: Encourage residents to consider earthquake insurance for their homes and businesses.

Program SF-2.1.7: Continue to comply with State law regarding reinforcement of unreinforced masonry structures.

Policy SF-2.2: Require professional inspection of foundations and excavations, earthwork, and other geotechnical aspects of site development during construction on those sites specified in soils, geologic, and geotechnical studies as being prone to moderate or high levels of seismic hazard.

Policy SF-2.3: Development on Slopes: Require that development in areas with identified slope stability constraints as shown on Map SF-1 or other areas where City staff determines there is potential slope stability issues be supervised and certified by a geologist, geotechnical engineer, or engineering geologist.

Program SF-2.3.1: Require repair, stabilization, or avoidance of active or potentially active landslides, areas of soil creep, or areas with possible debris flow as a condition of project approval.

Policy SF-2.4 Tsunami: Minimize development in areas subject to tsunamis.

Program SF-2.4.1: Request FEMA conduct the necessary studies to accurately map areas within the City that are subject to tsunamis.

Policy SF-2.5: Review development proposals to ensure that new development is not in an area subject to tsunami damage and if such development is otherwise allowable that it is designed to withstand tsunami damage.

Program SF-2.5.1: Review local- and distant-source tsunami inundation maps for Fort Bragg and adjacent coastal communities as they are developed to identify susceptible areas, plan evacuation routes or locations suitable for vertical evacuation and make evacuation plans available to all emergency responders and other appropriate parties.

Program SF-2.5.2: Identify and map potential tsunami inundation zones for land use planning. Maps should identify generalized tsunami inundation zones on a probabilistic basis (e.g., 100-year event).

Program SF-2.5.3: Review and update tsunami preparation response policies/practices to reflect current inundation maps and design standards, and submit these updated policies to the Coastal Commission for certification.

Policy SF-2.6: Avoid siting new critical facilities, including fire and police stations and hospitals in tsunami inundation zones to the maximum extent feasible. If it is necessary to site such facilities in tsunami inundation zones to provide adequate population protection, new critical

facilities shall be located and configured to be functional immediately after a 100-year tsunami event.

Program SF-2.6.1: Develop a local response plan and/or participate in any regional effort to develop and implement workable response plans for distribution of information on tsunami alerts, watches, and warnings, to appropriate emergency responders and City personnel.

Program SF-2.6.2: Include tsunami evacuation route information as part of any overall evacuation route sign program implemented in the City. Evacuation routes shall be clearly posted. An evacuation route traffic monitoring system that provides real-time information on the traffic flow at critical roadways should be considered.

Program SF-2.6.3: Develop and implement a tsunami educational program for residents, visitors, and people who work in the susceptible areas.

Policy SF-2.7: Require that overnight visitor-serving facilities in susceptible areas provide tsunami information and evacuation plans.

Goal SF-3 Reduce the risks from flooding.

Policy SF-3.1 Flood Hazards: Ensure adequate standards for development in the 100-year floodplain. (Refer to Map SF-2: Flood Hazards which shows areas prone to flooding.)

Program SF-3.1.1: Maintain and update as necessary the zoning and building code standards and restrictions for development in identified floodplains and areas subject to inundation by a 100-year flood. Use the Federal Emergency Management Agency's Flood Insurance Rate Map (FIRM) in the review of development proposals.

Program SF-3.1.2: Ensure all development in flood prone areas meet Federal, State, and local requirements.

Policy SF-3.2 Storm Drainage: Continue to maintain effective flood drainage systems and regulate construction to minimize flood hazards.

Program SF-3.2.1: Update the City's Storm Drain Master Plan.

Policy SF-3.3.2: Require, as determined by City staff, analysis of the cumulative effects of development upon runoff, discharge into natural watercourses, and increased volumes and velocities in watercourses and their impacts on downstream properties. Include clear and comprehensive mitigation measures as part of project approvals to ensure that new development does not cause downstream flooding of other properties.

Policy SF-3.4: Require development to pay for the costs of drainage facilities needed to drain project-generated runoff. Develop a City-wide drainage policy to assist staff to identify drainage improvements or impact fees required for development.

Policy SF-3.5: Require, where necessary, the construction of siltation/detention basins to be incorporated into the design of development projects.

Goal SF-4 Ensure emergency preparedness.



Policy SF-4.1 Coordinate with County: Continue coordination with the Mendocino County Emergency Services Authority.



Policy SF-4.2 Maintain an Updated Emergency Plan: Update the City's *Emergency Operations Plan* as needed to take into account the requirements of the California Emergency Management Systems (SEMS).

Program SF-4.2.1: Establish an emergency evacuation route system that includes standards for street identification, street widths, and grade standards for the evacuation route system.

Goal SF-5 Reduce fire hazards.

Policy SF-5.1 Minimize Fire Risk in New Development: Review all development proposals for fire risk and require mitigation measures to reduce the probability of fire.

Program SF-5.1.1: Continue to consult the Fort Bragg Fire Protection Authority in the review of development proposals to identify the projected demand for fire protection services and implement measures to maintain adequate fire protection services. Mitigation measures may include levying fire protection impact fees for capital facilities, if warranted.

Policy SF-5.2 Maintain a High Level of Fire Protection: Work with the Fire Protection Authority to ensure a continued high level of fire protection.

Program SF-5.2.1: Prepare a cost-benefit assessment of using paid firefighters within the Fort Bragg Fire Protection Authority and determine the appropriate ratio of paid-to-volunteer staff.

Program SF-5.2.2: Continue to use the City's Municipal Code to require automatic sprinkler systems in commercial and industrial development.

Program SF-5.2.3: Increase water main sizes or loop existing water mains where necessary to provide adequate flows for fire protection. The standard for water flow for fire protection purposes should be a minimum of 1,000 gallons per minute for 2 hours with 20 pounds per square inch residual pressure.

Program SF-5.2.4: Develop a plan to provide sprinklers for commercial structures in the Central Business District. The plan shall include consideration of City funding to construct risers for this area.

Program SF-5.2.5: Work with the Fort Bragg Fire Protection Authority to establish a regular schedule for periodic inspections of commercial and industrial premises by the Fire Prevention Officer.



Policy SF-5.3 Mutual Aid Agreements: Continue to maintain mutual aid agreements.

Program SF-5.3.1: Coordinate equipment use and purchase and inter-agency communications.

Program SF-5.3.2: Continue to coordinate with the Incident Command System (ICS) of Mendocino County.



Policy SF-5.4 Fire Protection Authority Needs: Anticipate the needs of the Fort Bragg Fire Protection Authority.

Program SF-5.4.1: Work with the Fort Bragg Fire Protection Authority to review its long-term fire plan on an annual basis to identify needed capital equipment and staff.

Policy SF-5.5 Vegetation Management: Continue to implement an effective and environmentally sound vegetation management and weed abatement program.

Program SF-5.5.1: Require a landscaping zone system for defensible space around buildings in high fire risk areas.

Program SF-5.5.2: Continue to require weed abatement to reduce the risk of fire. Use mechanical rather than chemical methods wherever possible.

Goal SF-6 Maintain effective police services.



Policy SF-6.1 Demand for Police Services: Review development proposals for their demand for police services and implement measures to maintain adequate police services.

Program SF-6.1.1: Consider the impacts on the level of police services of large development proposals in the environmental review and planning process.¹



Policy SF-6.2 Shared Resources: Utilize shared resources to improve police response.

Program SF-6.2.1: Periodically review shared use of resources such as communication facilities and joint use of personnel where feasible with the County Sheriff's Department.

Goal SF-7 Maintain an effective medical emergency response system.



Policy SF-7.1 Emergency Medical Response: Ensure that the Fire Protection Authority and the Mendocino Coast District Hospital continue to maintain a high level of emergency medical response.

Program SF-7.1.1: Periodically review the emergency medical response system.

¹ If warranted, mitigation measures may be required that may include the levying of police impact fees for capital facilities, purchasing equipment, and dedication of land for new facilities.



Policy SF-7.2 Maintain Mendocino Coast District Hospital's Emergency Facilities: Continue to encourage the Mendocino Coast District Hospital to maintain its emergency department and acute care facilities.

Program SF-7.2.1: Maintain ongoing communication with Mendocino Coast District Hospital to identify actions the City can implement to support the Hospital's Emergency Department.

Goal SF-8 Reduce hazards of transportation, storage, and disposal of hazardous materials and wastes.

Policy SF-8.1 Protection from Hazardous Waste and Materials: Provide measures to protect the public health from the hazards associated with the transportation, storage, and disposal of hazardous wastes (TSD Facilities).

Program SF-8.1.1: Continue to ensure that use, transportation, and disposal of hazardous materials are in accordance with the local, State, and Federal safety standards.²

Program SF-8.1.2: Continue to support and participate in Mendocino County's Hazardous Materials Business Plan which requires all businesses using hazardous materials to list the types, quantities, and locations of hazardous materials with the County's Department of Environmental Health.³

Program SF-8.1.3: Require, as a condition of City approvals of non-residential projects, that the Fire Protection Authority be notified of all hazardous substances that are transported, stored, treated, or could be released accidentally into the environment.

Program SF-8.1.4: Require that applications for discretionary development projects that will generate hazardous waste or utilize hazardous materials include detailed information on hazardous waste reduction, recycling, transportation, and storage, and prepare a plan for emergency response to a release or threatened release of a hazardous material.

Program SF-8.1.5: Revise the Coastal LUDC to require secondary containment facilities and a buffer zone adequate to protect public health and safety on properties with hazardous materials storage and/or processing activities.

Policy SF-8.2 Support Environmental Review of Hazardous Waste Transportation, Storage and Disposal Facilities: Support a thorough environmental review for Hazardous Waste Transportation, Storage and Disposal (TSD) Facilities, including waste to energy projects, proposed in the Fort Bragg area.

² Implementation of this program is the responsibility of the Fire Protection Authority

³ Chapter 6.95 of the California Health and Safety Code requires businesses with more than 50 gallons, 500 pounds or 200 cubic feet of hazardous materials to maintain a current Hazardous Materials Business Plan (HMBP). The law provides for the collection of fees to fund the program.

Program SF-8.2.1: Require that the environmental review of proposed Hazardous Waste TSD Facilities shall, at a minimum, contain the following analysis and information:

- a) A worst-case generic description, estimating the number, type, scale, scope, location, and operating characteristics of proposed TSD Facility(ies) based on the projected volumes and types of hazardous waste. Data from existing facilities regarding the probability of accidents, spills, and explosions should be documented and included;
- b) An assessment of risk resulting from the accidental release, fire, and explosion of hazardous waste. This assessment should take into account all phases of operation including transport, storage, and treatment. The assessment of risk should include the probability of occurrence and magnitude of impact;
- c) Quantify estimates of air emissions, by applying emissions rates of existing facilities to the future volumes of hazardous waste and identifying emissions for incinerator facilities under worst case circumstances;
- d) An assessment of non-incineration alternatives for hazardous waste treatment such as chemical dechlorination for the detoxification of PCBs, dioxins, solvents, and pesticides; photolysis; and biological treatment; and
- e) Review of the operating characteristics of proposed TSD Facilities, taking into account maintenance and operating procedures, emissions monitoring, and safety devices to assure the ongoing enforceability of the mitigating measures that are required.

Goal SF-9 Minimize community exposure to electromagnetic fields (EMFs).



Policy SF-9.1 Consider EMFs in Land Use Decisions: Consider information regarding EMF radiation from existing and new electrical transmission lines and substations in making land use decisions.

Program SF-9.1.1: Request that PG&E or other electrical energy distributors provide information on renovation to existing and proposed new electrical transmission lines and substations. Request that information on the EMF radiation levels for proposed new facilities be provided.

Program SF-9.1.2: Request that PG&E or any other electrical energy distributor provide a full and public disclosure of existing electrical transmission lines and existing and proposed facilities with their anticipated EMF levels within the Fort Bragg Planning Area.

Program SF-9.1.3: Require that all new electrical transmission projects and facilities have an EMF mitigation plan as part of the project's environmental review.



Policy SF-9.2 Siting of Schools and Other Sensitive Uses: Minimize and reduce EMF radiation levels near sensitive uses such as schools, hospitals, and playgrounds.

Program SF-9.2.1: Work with the School District to continue enforcement of California State Board of Education regulations requiring that new schools be sited at least 100 feet from the edge of the right-of-way of 100-110 kV lines; 150 feet from 220-230 kV lines; and 250 feet away from 345 kV lines.

