

4.7 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates the potential adverse impacts on human health and the environment due to potential exposure to hazards and hazardous materials occurring as a result of the project. The evaluation is based on existing environmental documentation available for the project site and adjacent properties; current regulatory laws and regulations on transportation, storage, and use of hazardous materials; and typical hazardous materials used during construction. As part of the project application, a Phase I Environmental Site Assessment and Phase II Soil Investigation were prepared in 2004. A full copy of the reports are available as part of the project application at City Hall.

A. Regulatory Framework

Various federal, State, County and local agencies oversee hazards and hazardous materials issues in Petaluma, and have established regulations at various levels designed to protect human health and the environment from the effects of hazardous materials. These agencies include the California Environmental Protection Agency (CEPA) and the Office of Emergency Services. The California Highway Patrol (CHP) and California Department of Transportation (Caltrans) enforce regulations specifically related to hazardous materials transport. Within CEPA, the Department of Toxic Substances Control (DTSC) has primary authority to enforce hazardous materials regulations. State hazardous waste regulations are contained primarily in Title 22 of the California Code of Regulations (CCR). Individual Regional Water Quality Control Boards (RWQCBs) are the lead agencies responsible for identifying, monitoring and cleaning up leaking underground storage tanks.

The City of Petaluma itself does not have direct authority over most hazardous materials issues, but has adopted local policies to ensure local compliance with hazards and hazardous material regulations and to limit risk presented by the handling of such materials.

1. Federal

Following are the federal agencies that oversee hazards and hazardous materials concerns.

a. Environmental Protection Agency

The United States Environmental Protection Agency's (EPA) laws and regulations ensure the safe production, handling, disposal and transportation of hazardous materials. Laws and regulations established by the EPA are enforced in Petaluma by the CEPA.

The Superfund Program was established by the EPA in 1980 to locate, investigate and clean up the most contaminated sites nationwide. The EPA selects these sites based on the evaluation of factors

such as human health and environmental risk, immediacy of any needed response, projected expenses to the fund, ability to maintain a strong enforcement program, leverage of other cleanups, and the level of support for listing from the local government and community.

b. U.S. Department of Transportation

The United States Department of Transportation (DOT) regulates the transportation of hazardous materials by truck and rail. The DOT also establishes criteria for safe handling procedures of hazardous materials.

2. State

Following are the State agencies and regulations pertaining to hazards and hazardous materials.

a. California EPA and Department of Toxic Substance Control

One of the primary agencies that regulate hazardous materials is the CEPA, which is authorized by the EPA to enforce and implement federal hazardous materials laws and regulations throughout the site. The DTSC, a department of the CEPA, protects California and Californians from exposure to hazardous waste primarily under the authority of the federal Resource Conservation Recovery Act (RCRA) of 1976 and the California Health and Safety Code. DTSC programs include dealing with clean-ups of improper hazardous waste management, evaluation of samples taken from sites, enforcement of regulations regarding use, storage and disposal of hazardous materials, and encouragement of pollution prevention.

b. California Health and Safety Code

The California Health and Safety Code requires that facilities that use or store hazardous materials at or above reporting thresholds submit this information in a Hazardous Materials Business Plan (HMBP). A HMBP is a document containing detailed information on the storage of hazardous materials at a facility. The intent of the HMBP is to satisfy federal and State Community Right-To-Know laws and provide detailed information for use by emergency responders.¹

c. Certified Unified Program Agencies

The Unified Hazardous Waste and Hazardous Management Regulatory Program (SB 1082, 1993) is a State and local effort to consolidate, coordinate, and establish consistency between existing programs regulating hazardous waste and hazardous materials management. CEPA adopted implementing regulations for the Unified Program 22 in January 1996. The Unified Program is imple-

¹ Sonoma County Department of Emergency Services, *CUPA Uniform Program Consolidated Reporting Forms*, page 2.

mented at the local level by Certified Unified Program Agencies (CUPAs).² The CUPA for Petaluma is the Petaluma Fire Department.

3. Sonoma County Department of Emergency Services

While different agencies have different responsibilities in regulating hazardous materials, the Department of Emergency Services (DES) has been designated as the lead agency for the comprehensive hazardous materials management plan, including the County Operational Area Hazardous Materials Incident Response Plan. This Plan provides for effective responses to releases of hazardous materials, the safe disposal of hazardous wastes and a public information program.³ The DES also administers the County's Hazardous Waste Management Plan, which specifies procedures for handling and disposing of hazardous waste. The Plan is updated annually with information distributed to all nine Bay Area counties by the Association of Bay Area Governments (ABAG). The annual ABAG updates analyze hazardous waste generation and hazardous waste management capacity in all nine counties. The updates also provide a framework for cooperative action between the counties in terms of generating, managing, and disposing of hazardous wastes.⁴ The following provides some information on the divisions of the DES responsible for emergency and hazardous materials management.

a. Emergency Management Division

The Division of Emergency Management is the lead agency for the Sonoma Operational Area, which includes several incorporated cities, including Petaluma, Sonoma State University, the Sonoma County Junior College District and other special districts within the county's geographical boundary. The Operational Area is defined under California's Standardized Emergency Management System (SEMS) as the primary level of coordination for response and recovery activities following an emergency or disaster. SEMS is a management system that provides an organizational framework and guidance for operations at each level of the State's emergency management system. It provides the umbrella under which all response agencies may function in an integrated fashion.⁵ The Emergency Management Division provides the primary level of coordination for emergency response, recovery and mitigation activities following an emergency such as a hazardous materials release.⁶

² *Sonoma County General Plan 2020 Draft EIR*, 2006, page 4.13-9.

³ County of Sonoma, Permit and Resource Management Department. Memo to the Planning Commission re: GP2020 Public Safety Element, May 9, 2006.

⁴ Andy Parsons, Sonoma County Department of Emergency Services, Hazardous Materials Program Manager. Personal communication, November 29, 2006.

⁵ County of Sonoma: Department of Emergency Service, http://www.sonoma-county.org/des/emerg_manag.htm, accessed on March 27, 2006.

⁶ *Sonoma County General Plan 2020 Draft EIR*, 2006, page 4.13-10.

b. Hazardous Materials Division

The Hazardous Materials Division is responsible for enforcing the regulatory-based Hazardous Materials Business Plan Program, Hazardous Waste Program, Underground Tank Program, Accidental Release Program, and the portions of the Uniform Fire Code that address hazardous materials. Inspections of businesses in the County that are included in any of these programs are conducted on a routine basis.⁷ Hazardous materials emergency response is the responsibility of the Hazardous Materials Division.⁸

c. Fire Services Division

The Fire Services Division conducts hazardous materials inspections for businesses in Sonoma County and responds to “Haz Mat” incidents as part of the County Hazardous Materials Response Team.⁹

4. City of Petaluma

Following are the departments, plans and programs in place in the City of Petaluma to address and reduce risks involving hazards and hazardous materials.

a. City of Petaluma General Plan

Through the Hazardous Materials sub-section of the City’s General Plan, the City adopted various programs and plans to provide protection for public health, safety, welfare and the environment by establishing a framework for the responsible management of hazardous wastes while maintaining economic vitality.¹⁰ The General Plan also includes relevant policies in the Health and Safety Element. These policies are listed below. Similarly, Table 4.7-1 lists the various plans and programs that relate to hazards and hazardous waste in regards to the proposed project.

b. City of Petaluma Fire Department

Chapter 17.21 of the Petaluma Municipal Code codified the Petaluma Fire Department as the local CUPA, which regulates and enforces all applicable provisions of State laws regarding hazardous waste control, underground storage of hazardous substances, aboveground storage of petroleum, hazardous materials release response plans and inventory, hazardous materials management plans and all other provisions of law enforceable by CUPA.¹¹

⁷ County of Sonoma: Department of Emergency Service, http://www.sonoma-county.org/des/haz_material.htm, accessed on June 12, 2006.

⁸ *Sonoma County General Plan 2020 Draft EIR*, 2006, page 4.13-8.

⁹ *Sonoma County General Plan 2020 Draft EIR*, 2006, page 4.13-10.

¹⁰ City of Petaluma, *Petaluma General Plan 2025*, page 10-10.

¹¹ *City of Petaluma Municipal Code*, Section 17.21.010.A.

TABLE 4.7-1 **PETALUMA GENERAL PLAN 2025 POLICIES AND PROGRAMS—HAZARDS AND HAZARDOUS MATERIALS**

Policy/Program Number	Policy/Program
<i>Health and Safety Element</i>	
10-P-4	Minimize the risk to life and property from the production, use, storage, and transportation of hazardous materials and waste by complying with all applicable State and local regulations.
10-P-4 (B)	Prepare and maintain an inventory of environmentally contaminated sites to educate future landowners about contamination from previous uses. Work directly with landowners in the cleanup of these sites, particularly in areas with redevelopment potential.

Source: City of Petaluma General Plan 2025, May 2008.

The Fire Prevention Bureau is charged with mitigating the effects of fire and hazardous materials incidents on the community.¹² The Fire Marshal’s Office regulates all aspects of hazardous materials storage, use and waste disposal. This includes storage, policy, training of personnel and procedures for processing the various elements of the CUPA program.¹³

c. Petaluma Hazardous Materials Response Plan

Petaluma has a Hazardous Materials Response Plan. The plan’s goals are to coordinate the emergency services provided by agencies at various levels of government and by private service providers. The Hazardous Materials Response Plan’s goals are to contain and identify hazardous materials spills and to implement evacuation programs as needed.¹⁴

B. Existing Conditions

The following describes the existing conditions on site and in the project vicinity related to hazardous materials and hazards. Site-specific information was obtained from the Phase I Environmental Site Assessment and Phase II Soil Investigation conducted for the project site. The Phase I was prepared in May 2004 to identify and assess the potential for hazardous materials-related risks. The assessment determined that certain areas of 482 Kenilworth Drive (Petaluma Transit Facility, which is not part of the project site) required further investigation and thus the Phase II was completed in

¹² City of Petaluma, *Fiscal Year 2006 Budget*, page OP-96.

¹³ City of Petaluma, *Fiscal Year 2006 Budget*, page OP-98.

¹⁴ Petaluma General Plan Update Draft Environmental Impact Report, page 3.13-10.

June 2004 for that parcel. These reports are available for viewing as part of the project applicant's application package at City Hall.

1. Project Site

The project site was formerly home to Kenilworth Junior High School, which has been demolished and moved to a new location. At the time the Phase I and II reports were prepared, the school site still contained its seven school buildings (constructed in 1956), baseball diamonds, tennis courts, recreational facilities and ornamental landscaping. The buildings were constructed of wood frame and concrete block and were finished on the exterior with stucco, and on the interior with floor tiles, ceiling tiles and other interior finishes.

The Petaluma School District bus facility will remain adjacent to the southern end of the project site. Its facilities include one office building and one maintenance building, which were considered in the Phase I and II reports. The project site contains structures associated with the Little League's Carter Field facility, which due to its age, may contain hazardous materials, as described below.

2. Hazardous Materials

Products as diverse as gasoline, paint solvents, film solvents, household cleaning products, refrigerants and radioactive substances are categorized as hazardous materials. What remains of a hazardous material after use or processing is considered to be a hazardous waste. The handling, transportation and disposal of such materials and wastes are of concern in all communities. Improper handling of hazardous materials or wastes may result in significant effects to human health and the environment.

a. Uses On-Site.

The Phase I report was completed in 2004 for the larger site, including the school bus yard at 482 Kenilworth Drive. It found contamination on the transit site and as a result, a Phase II soil investigation was completed for 482 Kenilworth Road. This is discussed below.

i. 482 Kenilworth Road

A report was prepared in August 2005 to provide documentation to the Sonoma County Environmental Health Division of the corrective action and groundwater monitoring activities conducted at the school bus yard facility from June 13 through 17, 2005. The work plan was approved by the County on September 24, 2004.¹⁵ The corrective action resulted in the removal of the entire former UST pad and gravel backfill, along with a substantial quantity of groundwater and some impacted soils. The test results indicated that the remaining soil from approximately 9 to 10 feet be-

¹⁵ URS, 2005, *Final Report: Petaluma Bus yard Facility Mitigation*, page 1-1.

low grade, and below the groundwater table, contains TPHg, TPHd and BTEX¹⁶ concentrations in excess of the cleanup criteria set forth in the approved work plan. In addition, the extracted groundwater had elevated concentrations of these same compounds. The report stated that continued groundwater monitoring would be conducted for the next consecutive nine months.¹⁷

ii. Carter Little League Field

A portion of the project site is currently used for games by the Petaluma Little League. The Little League's facility at Carter Field includes a baseball diamond, fencing, at-grade dugout structures, spectator seating, and an elevated, enclosed booth that is used for score keeping and announcing. The structures associated with Carter Field have not been evaluated to determine whether or not they contain potentially hazardous materials. However, due to their age, there is the possibility that there is asbestos within the structure.

b. Uses Off-Site

Many of the commercial and industrial operations around the project site use hazardous materials and generate hazardous waste as part of their daily operations. Some examples of hazardous material users include gasoline stations, dry cleaners and automotive repair shops. Individuals also use hazardous materials, such as cleaning supplies and paint, in and around their homes. The Phase I study concluded that no upgradient facilities identified are expected to have impacted the project site due to previous spill incidents or ongoing clean up efforts.¹⁸

c. Routine Transportation

In addition to hazardous materials used and generated within Petaluma, hazardous materials and wastes pass through Petaluma en route to other destinations via Highway 101 and other major arterials. The City does not have direct authority over the transport of hazardous materials on the major roads and highway within Petaluma. As mentioned above, transportation of hazardous materials by truck and rail is regulated by the Department of Transportation (DOT).

d. Nearby Contaminated Sites

A search of the EPA website revealed that there is one site within Petaluma which is currently on the Final National Priorities List. The Sola Optical USA site is 1.5 miles from the project site.

¹⁶ TPHg = Total petroleum hydrocarbons quantified as gasoline; TPHd = TPH quantified as diesel; BTEX = benzene, toluene, ethylbenzene, and xylenes.

¹⁷ URS, 2005, *Final Report: Petaluma Bus Yard Facility Mitigation*, page 6-1.

¹⁸ URS, 2004, *Phase I Environmental Site Assessment*, URS Job No. 29403119, page 18.

Contamination in the soil at the site is currently within federal guidelines, and soil contaminants will not affect groundwater below or in the near vicinity of the site.¹⁹

3. Proximity to Schools

Four schools are within a quarter mile of the project site: Live Oak Charter School, McKinley Elementary, McDowell Elementary, and Crossroads Community Day School (secondary).²⁰ Live Oak Charter School leases several buildings on the Sonoma-Marin Fairgrounds, across Kenilworth Drive from the project site. Live Oak Charter School has an enrollment of 225 K-7th grade students.

4. Cortese List

The project site is not included on the Cortese list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 by the DTSC.²¹

5. Wildland Fires

Since Petaluma is mainly surrounded by agricultural activities, and does not abut wildlands, the most common types of fire in the area are structural or urban fires. Wildland fires are not a threat to the project site which is surrounded by urban uses on all sides.

6. Airports and Airstrips

Although the Petaluma Municipal Airport is located less than 2 miles to the northeast of the project site, the project site is not near the airport traffic pattern or airport influence zones.²² There are no private airstrips within the vicinity of the project site.

7. Interference with an Emergency Response or Evacuation Plan

The City of Petaluma adopted an Emergency Operations Plan (EOP) in March 2006. Neither the project site nor its immediate surroundings are designated in the EOP as evacuation areas; however,

¹⁹ EPA Superfund, <http://yosemite.epa.gov/r9/sfund/overview.nsf/ef81e03b0f6bcdb28825650f005dc4c1/a6142a5c857ba9de8825660b007ee671!OpenDocument>, accessed on November 11, 2005.

²⁰ School addresses were obtained from the Petaluma City Schools website (<http://www.petalumacityschools.org/index.html>), which were then used to map school locations in www.mapquest.com. Mapped schools were then cross-referenced against the City's General Plan Land Use map.

²¹ California State, Department of Toxic Substances Control's, <http://www.envirostor.dtsc.ca.gov/public/default.asp>, accessed on December 3, 2008.

²² Michael Glose, Airport Manager, Petaluma Municipal Airport. Personal e-mail communication with Jennifer Phelps Quinn, DC&E, November 11, 2005.

the EOP authorizes the Emergency Operations Chief (EOC) to conduct emergency response operations and designate evacuation areas as necessary.²³

8. Hazards Related to Local Cultural Activities

Every year, the City of Petaluma holds the Fourth of July fireworks show at the Sonoma-Marin Fairgrounds, located adjacent to the project site. The fallout area from firework mortars includes the project site.²⁴

C. Standards of Significance

The proposed project would have a significant impact related to hazards or hazardous materials if it would:

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 reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.
5. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.
6. For a project within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people living or working in the project area.
7. For a project within the vicinity of a private airstrip, result in a safety hazard for people living or working in the project area.

²³ Michael Ginn, City of Petaluma Fire Department Battalion Chief/Fire Marshal. Personal e-mail communication with DC&E, January 5, 2007.

²⁴ Michael Ginn, Petaluma Fire Marshall. Personal communication with Chantal Charette, August 18, 2005.

8. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
9. Expose people or structures to a significant risk of loss, injury or death involving important local cultural activities, such as the annual Fourth of July firework shows and County fairs.

D. Impact Discussion

1. Project Impacts

For the following analysis, the existing General Plan was reviewed. The following project impacts associated with hazards and hazardous materials have been identified.

1. Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.

The project site is proposed for mixed-use development. The proposed retail development would consist of general retail uses, none of which would generate substantial amounts of hazardous materials or require the transportation of substantial amounts of hazardous material. There would be some on-site use of common hazardous materials, such as cleaning solutions, as part of daily operations. Larger amounts of hazardous materials may be used if a photo-developer or dry-cleaner is included into the retail operations. However, these uses are regulated extensively by federal, State, regional, County and local agencies that are tasked to assure there are no significant risks to the public from the transport, use or disposal of hazardous materials.

Hazardous materials used during construction are also a concern. Typically, the hazardous materials used on-site during construction are gasoline, diesel fuel, lubricating oil, grease, hydraulic fluid, solvents, caulking and paint. Potential impacts during construction, including unforeseen accidents, from the use of these materials on-site would be reduced to less-than-significant levels through compliance with all applicable regulations, as mentioned above, as well as the use of standard handling practices and of trained personnel.

Considering the limited amount of hazardous materials that would be used or produced on-site, along with all the existing regulations governing these types of materials, this impact is considered *less than significant*.

2. 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.

a. Reasonably Foreseeable Release

The project would create a significant hazard to the public or the environment if it resulted in the reasonably foreseeable upset or release of hazardous materials into the environment. The 993 Lindberg Lane site was found to have contaminated soil in the Phase II assessment. Under the revised project, 993 Lindberg Lane is no longer a part of the project and demolition of the school bus facility is no longer a project component. Therefore, there are no potentially significant impacts from the foreseeable release of hazardous materials.

The project would involve the demolition of the Little League facilities currently associated with Carter Field. Due to their age, the structures at Carter Field could contain asbestos. Because asbestos has been proven to cause serious adverse health effects, such as asbestosis and lung cancer, it is regulated in its use as a building material. Potential worker exposure to or release of asbestos during demolition activities is considered a *potentially significant* impact.

b. Accidental Release from Project Uses

The project includes office and retail uses. There is potential for some of the proposed retail uses to generate hazardous materials. For example, if a photo processing lab was included in the retail uses, it would generate hazardous chemicals used for film processing. Since the storage and handling of these materials is heavily regulated by federal and State laws, the accidental release of such materials is considered to be a *less-than-significant* impact.

3. Emit hazardous emissions or handle hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

Even though there are schools within a ¼-mile radius of the project site, hazardous materials that would be used or produced on-site would not be of such a volume to pose a threat considering the numerous regulations mentioned above. This impact is considered to be *less than significant*.

4. Be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

As stated above, the project site is not included on the Cortese list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 by the DTSC. Thus there would be *no impact*.

5. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are inter-mixed with wildlands.

The project would not increase the risk of wildland fires as there is a limited threat of wildland fires on the project site or in the immediate vicinity. Thus there would be *no impact*.

6. For a project within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people living or working in the project area.

As noted above, the project is not within the flight path of air traffic or any safety zones of the Petaluma Municipal Airport. Thus there would be *no impact*.

7. For a project within the vicinity of a private airstrip, result in a safety hazard for people living or working in the project area.

No private airstrips are located in the immediate vicinity of the project, thus there would be *no impact*.

8. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The proposed project would have a significant impact if it impeded emergency circulation and access. As proposed, the East Washington Place project by its design and location is not expected to obstruct emergency access or circulation. Therefore, this impact is considered *less than significant*.

9. Expose people or structures to a significant risk of loss, injury or death involving important local cultural activities, such as the annual Fourth of July firework shows and County fairs.

The proposed project is located adjacent to the Sonoma-Marin Fairgrounds. The annual City Fourth of July fireworks show is located at the Fairgrounds and the new development may be impacted from fallout from firework mortars. The Fire Department has agreed to move the mortar firing area (launch area) 200 feet to the west, thus the fallout area further away from development.²⁵ During construction, the fireworks show would pose a fire risk to the unprotected construction materials on-site if burning embers were to fall onto wood and other flammable materials. Furthermore, falling embers could damage property or harm individuals once the project becomes operational. This may cause a *significant* safety impact.

2. Cumulative Impacts

A list-based approach has been used for this cumulative analysis. The analysis considers the development projects listed in Appendix E (Cumulative Projects) and whether this project would have significant cumulative impacts related to hazards and hazardous materials in combination with the cumulative projects.

²⁵ Michael Ginn, Petaluma Fire Marshall. Personal communication with Chantal Charette, August 18, 2005.

The project would not contribute to a significant cumulative impact related to hazardous materials. Any potential impacts that could arise from developing on sites that are already contaminated would be adequately addressed under each individual project. The project would not have any significant impacts related to hazards either, such as wildland fires. Thus, there would be no cumulative impact from hazards or hazardous materials associated with likely development in the Petaluma area, nor would the proposed project contribute to a significant cumulative impact.

E. Impacts and Mitigation Measures

Impact HAZ-1: Demolition of the Carter Field Little League facilities may result in worker exposure to asbestos containing materials (ACMs) and the release of airborne asbestos.

Mitigation Measure HAZ-1: Prior to demolition of the Carter Field, the applicant should coordinate with the Bay Area Air Quality Management District (BAAQMD) to arrange for an inspection of structures to be demolished. If asbestos is detected in either structure, the demolition and removal of asbestos-containing building materials will be subject to applicable BAAQMD Regulations and the applicant would be required to obtain a Job Number from the BAAQMD. The applicant would be required to present the Job Number to the City Building Department before demolition could commence.

Significance After Mitigation: *Less than significant.*

Impact HAZ-2: During the project construction period, the proposed project may increase fire danger related to the City of Petaluma's annual Fourth of July firework show due to the fire risk posed by burning embers falling on exposed construction materials.

Mitigation Measure HAZ-2a: The Petaluma Fire Department and General Contractor should meet several weeks before the Fourth of July fireworks event for logistical planning and to determine what areas must be cleaned and protected from possible firework fallout. The Petaluma Fire Department should also coordinate with the State Fire Marshall at least two weeks before the event to ensure that any of the Marshall's concerns are adequately addressed.

Mitigation Measure HAZ-2b: During the project construction period, the developer should be required to hire Petaluma Fire Department crew to stand by with trucks during the fireworks show to monitor the site for potential fires started by falling embers on construction materials.

Significance After Mitigation: *Less than significant.*

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EAST WASHINGTON PLACE EIR
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