4.7 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates the potential adverse impacts on human health and the environment due to exposure to hazards and hazardous materials that could be encountered as a result of implementing the East Washington Place 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.

Petaluma itself does not have direct authority over most hazardous materials issues, but has adopted local policies to assure 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 worst sites contaminated by hazardous waste 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

a. State Regulatory Agencies

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. The DTSC, a department of the CEPA, protects California and Californians from exposures to hazardous waste primarily under the authority of the federal Resource Conservation Recovery Act of 1976 and the California Health and Safety Code. DTSC programs include dealing with aftermath 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 make consistent existing programs regulating hazardous waste and hazardous materials management. Cal EPA adopted implementing regulations for the Unified Program 22 in January 1996. The Unified Program is implemented at the local level by Certified Unified Program Agencies (CUPAs).[2] The CUPA for Petaluma is the Petaluma Fire Department, which is discussed further in section A.4.b. below.

3. Sonoma County

a. Department of Emergency Services

While different agencies have different responsibilities in the regulation of 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

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

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

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.

i. 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]

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[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.

ii. 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]

iii. 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

The City of Petaluma has the following departments, plans and programs in place to address and reduce risks involving hazards and hazardous materials:

a. City of Petaluma General Plan

Through the Hazardous Waste Management section of the City's existing 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 proposed General Plan also includes relevant policies in the Health and Safety Element. Table 4.7-1 lists the various plans and programs, both adopted and proposed, that relate to hazards and hazardous waste in regards to the proposed project.

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[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, 1987, *Petaluma General Plan 1987-2005,* page 122.

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

Policy/ Program Number	Policy/Program
Existing General Plan	
Community Health & Safety Element	
Fire Services	
Policy 20	Emergency access routes shall be kept free of traffic obstacles, such as railroad track in disrepair, drainage swales, and illegally parked vehicles.
Policy 22	Continue to require landowners to clear lots of excessive vegetation.
Policy 23	All landscaping within 50 feet of buildings in fire hazard area shall be fire-resistive.
Policy 23.1	Consider using a portion of the urban area as a fire break in fire hazard area.
Program 16	Install traffic-signal override systems for emergency vehicles on all significant streets.
Hazardous Waste Management	
Program 21	In order to minimize the dangers of hazardous waste, the City shall require the handling transport, treatment, storage or disposal of such waste in a manner that is consistent with Sonoma County's Hazardous Waste Management Plan.
Program 22	Establish special zoning designations and environmental review processes that limit the location of industry, research, and business facilities using hazardous materials. Safe distances should be required between these firms and residential areas, groundwater recharge areas, and waterways.
Proposed General Plan	
Health and Safety Element	
Goal 10-G-3	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-14	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.

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]

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 contain and identify hazardous materials spills and to implement evacuation programs as needed.[14]

B. Existing Conditions

The following describes the existing potential for hazardous materials, airport, emergency response and wildland-related hazards in the project area. 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 identified certain areas of 993

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

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

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

[14] City of Petaluma, 1987, *Petaluma General Plan 1987-2005,* page 121.

Lindberg Lane and 482 Kenilworth Drive required further investigation and thus the Phase II was completed in June 2004 for those parcels. 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 grassy areas. 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. As of the publication of this EIR, the Petaluma School District bus facility has not been demolished and thus its facilities, one office building and one maintenance building, were considered in the Phase I and II reports. These buildings are situated at the far eastern end of the site. The City is planning on processing the demolition of the bus barn facility under a separate permitting process, however, potential impacts associated with removal of the facility have been examined in this analysis. The bus facility is located at 993 Lindberg Lane and is described below under sub-section, Hazardous Materials.

The site also contains structures associated with the Little League's Carter Field facility, which due to their age may contain hazardous materials, as described under sub-section, Hazardous Materials..

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

At the time of the Phase I report in 2004, hazardous substances were found to have been used at several sites within the project site, including the former Petaluma Transit facility. The Phase I found that soil in the bus maintenance facilities areas operated by the Petaluma School District and the Petaluma Transit Agency required further investigation, so the Phase II soil investigation was completed for 993 Lindberg Lane and 482 Kenilworth Road.

i. 993 Lindberg Lane

The Phase II Soil Investigation concluded that soils and groundwater have been impaired by past on-site activities. At 993 Lindberg Lane, three underground storage tanks (UST) were found to have leaked when they were replaced in 1987. They were removed and three new USTs were installed in a nearby location. Investigations in 1990 and 1991 of the former UST location indicated that the soil and groundwater required remediation. The Phase II also concluded that when the USTs were removed in 1987, the contamination was not entirely removed. Soils and groundwater immediately adjacent to and downgradient of the former UST location remain impacted by fuel hydrocarbons. This will require remediation to remove the source.[15] The Sonoma County Environmental Health Division has requested preparation of a Corrective Action Plan (CAP) before closure of the UST case will be considered.[16]

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 Petaluma Bus Yard Facility from June 13 through 17, 2005. The work plan was approved by the County on September 24, 2004.[17] The corrective action resulted in the re-

[15] URS, 2004, *Phase II Soil Investigation for 993 Lindberg Lane and 482 Kenilworth Drive,* pages 5 to 6.

[16] URS, 2004, *Phase I Environmental Site Assessment*, URS Job No. 29403119, page 19.

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

moval 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 below grade, and below the groundwater table, has TPHg, TPHd, and BTEX[18] concentrations in excess of the cleanup criteria set forth in the approved work plan. The extracted groundwater had elevated concentrations of these same compounds. One well monitored had detected TPHg, TPHd and benzene in excess of their RWQCB's residential Environmental Screening Levels (ESLs) for groundwater (considered a drinking water resource). The report stated that continued groundwater monitoring would be conducted for the next consecutive three quarters.[19]

The applicant is requesting a transfer of the case to the San Francisco Bay Area RWQCB from the County of Sonoma so that the applicant can obtain Risk-based Closure for the non-residential UST and a residential Risk-based Closure for the residential uses. Once the case is transferred, a Residual Risk-based Management Plan will be prepared to address the remaining contamination. To do this, the San Francisco Bay Area RWQCB will need to open a new case and require additional investigation of residential areas. Soil borings will be established and a Cost Recovery Agreement instituted under the new case.[20]

Due to the age and function of the bus maintenance facility, it is also possible that it includes asbestos-containing material (ACM). A facility-specific asbestos-survey was not completed as part of the Phase I in 2004 and would need to be completed prior to demolition to confirm the presence of ACMs.

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

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

[20] David Denning, Regency Centers. Personal email communication to Catherine Reilly, DC&E, January 5, 2006.

ii. 482 Kenilworth Road

At 482 Kenilworth Road, the soils are minimally impacted near the surface by total petroleum hydrocarbons (TPH). The concentration of TPH detected is below screening levels for heavy end hydrocarbons used in the San Francisco Bay region and would not require remedial efforts. Since this portion of the property may be used residentially, the Phase II report recommended segregating the TPH and visually oil-impacted soils and using them under roadways, if possible.[21]

iii. Petaluma Little League-Carter 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 used 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 commonly encountered 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 their proximity to the project area, and/or their status, or lack of reported releases.[22]

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[21] URS, 2004, *Phase II Soil Investigation for 993 Lindberg Lane and 482 Kenilworth Drive*, page 5.

[22] URS, 2004, *Phase I Environmental Site Assessment*, URS Job No. 29403119, page 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. Contamination in the soil is currently within federal guidelines, and soil contaminants will not affect the groundwater.[23]

3. Proximity to Schools

Three schools are within a quarter mile of the project site: McKinley Elementary, McDowell Elementary and Crossroads Community Day School (secondary).[24]

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.[25]

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[23] EPA Superfund, http://yosemite.epa.gov/r9/sfund/overview.nsf/ef81e03b0f6bcdb28825650f005dc4c1/a6142a5c857ba9de8825660b007ee671!OpenDocument, accessed on November 11, 2005.

[24] 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.

[25] California State, Department of Toxic Substances Control's, http://www.envirostor.dtsc.ca.gov/public/default.asp, accessed on March 28, 2006.

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.

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.[26] 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 the EOP authorizes the Emergency Operations Chief (EOC) to conduct emergency response operations and designate evacuation areas as necessary.[27]

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.[28]

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

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

[28] Michael Ginn, Petaluma Fire Marshall. Personal communication with Chantal Charette, August 18, 2005.

C. Standards of Significance

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

- Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- Emit hazardous emissions or handle hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.
- Be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result create a significant hazard to the public or the environment.
- 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.
- 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.
- For a project within the vicinity of a private airstrip, result in a safety hazard for people living or working in the project area.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures 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

For the following analysis, both the existing and proposed General Plans were reviewed to determine whether there would be different conclusions under either Plan. Unless otherwise stated below, the following impact analysis and its conclusions would apply under either General Plan scenario. The following project impacts associated with hazards and hazardous materials have been identified.

1. Project Impacts

a. Routine Transport, Use or Disposal of Hazardous Materials

The project site is proposed for residential and commercial 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 who 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 by 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.*

b. Upset or Accidental Release of Hazardous Materials

i. Reasonably Foreseeable Release

The proposed 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 project would involve the demolition of the School District bus maintenance facility located at 993 Lindberg Lane and subsequent earthwork (i.e. excavation, grading) to prepare the site for project construction. The 993 Lindberg Lane site was found to have contaminated soil in the Phase II assessment. These contaminants could pose a health risk to future residents of the project site if the site is not remediated. However, the project applicant is working to transfer the case to the San Francisco Bay Area RWQCB to be able to obtain Risk-based Closure for the non-residential UST and a Residential Risk-based Closure for the residential uses. Until the closure is fully implemented and approved by the San Francisco Bay Area RWQCB, this impact remains *significant*.

In addition to the maintenance facility, the project would also involve the demolition of the Little League facilities currently associated with Carter Field. Due to their age, the bus maintenance facility and 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 strictly regulated either based on its natural widespread occurrence, or in its use as a building material. Potential worker exposure to or release of asbestos during demolition activities is considered a *significant impact.*

ii. Accidental Release from Project Uses

The proposed project proposes residential and retail uses at East Washington Place. The residential uses would be expected to generate only small quantities of hazardous materials, such as household batteries, paint, and cleaners. The accidental release of hazardous materials from these uses resulting in a significant environmental impact would be unlikely. However, there is the potential for some of the proposed retail uses to generate larger quantities of 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 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.

c. Proximity to Schools

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

d. Cortese List

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

e. Wildland Fires

The proposed project would not increase the risk of wildland fires as there is a limited threat of wildland fires in the area. Thus there would be *no impact*.

f. Airports and Airstrips

As noted above, the proposed 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.*

g. Interference with an Emergency Response or Evacuation Plan

The proposed project would have a significant impact if it impeded on the circulation and access of the Fairgrounds. As proposed, the East Washington Place project by its design and location is not expected to obstruct access to, nor circulation in or around, the Fairgrounds. Therefore, this impact is considered *less than significant*.

h. Local Cultural Activities

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 residential 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 keeping the fallout away from residents.[29] However, 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. 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 C (Cumulative Projects) and whether this project would have significant cumulative impacts related to hazards and hazardous materials in combination with the cumulative projects.

Because neither the proposed project nor any of the reasonably foreseeable development would involve the transport, use or disposal of significant amounts of hazardous materials that would not be closely monitored and regulated, they would not cumulatively result in environmental impacts related to hazards or hazardous materials. Any potential impacts that could arise from developing on sites that are already contaminated would be adequately addressed under each individual project. 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.

[29] Michael Ginn, Petaluma Fire Marshall. Personal communication with Chantal Charette, August 18, 2005.

E. Impacts and Mitigation Measures

Impact HAZ-1: Implementation of the proposed project at the 993 Lindberg Lane site has the potential to expose future residents at the project site to soil and groundwater contaminants.

Mitigation Measure HAZ-1: Prior to building permit approval, the project applicant should secure Risk-based Closure for the non-residential UST and Residential Risk-based Closure for the residential uses from the San Francisco Bay RWQCB. The project applicant should also comply with any applicable requirements set by the Certified Unified Program Agency (Petaluma Fire Department in this case) concerning removal and disposal of the UST.

Significance After Mitigation**:** *Less than significant.*

Impact HAZ-2: Demolition of the Carter Field Little League facilities and the bus maintenance facility may result in worker exposure to asbestos containing materials (ACMs) and the release of airborne asbestos.

Mitigation Measure HAZ-2: Prior to demolition of the Carter Field and the bus maintenance facility at 993 Lindberg Lane, 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-3: 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-3a: 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-3b: 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*.