

4.7 HAZARDOUS MATERIALS/RISK OF UPSET

This section addresses a number of issues, including: the potential presence of and risk of exposure to hazardous materials at the project site and potential risk of upset associated with the Project's location adjacent to the Union Pacific Railroad (UPRR) right-of-way (ROW), U.S. 101, nearby businesses using hazardous materials and a high pressure natural gas line. The information presented in this section pertaining to hazardous materials at the site is based in part on a Phase I Environmental Site Assessment (ESA) prepared by Property Solutions, Inc. (September 2014). This report is provided in Appendix F. The findings of a health risk assessment that evaluates potential long-term impacts related to exposure of site residents to emissions from the adjacent UPRR and U.S. 101 are addressed in Section 4.2, *Air Quality*.

The risk of upset associated with various potential sources of upset hazards, including nearby businesses, U.S. 101, the UPRR, and a high pressure natural gas line have been consolidated into a single impact (Impact HAZ-2) to better reflect the overall level of risk to which the Project would be subject.

4.7.1 Setting

a. Overview. The Goleta General Plan/Coastal and Land Use Plan Final EIR, 2006, analyzed potential safety hazards caused by the presence, use, manufacture or transport of hazardous materials within the City. The risk of upset focused on humans and assessed potential impacts from accidents, explosions and other releases. The General Plan/Coastal and Land Use Plan Final EIR identified a Class I impact for transportation of hazardous materials on the UPRR rail line and U.S. 101. At certification of the FEIR, the former City Council made a statement of overriding considerations.

The project site is an 17.36-gross acre property that is bounded on its north by the Union Pacific Railroad (adjacent to the project site) and U.S. 101 (approximately 250 to 300 feet north of the project site), on the west by S. Los Carneros Road with an approved residential development currently under construction (Village at Los Carneros) beyond, on the south by Camino Vista Road and the Willow Springs residential development, and on the east by Aero Camino Road and industrial uses.

Historically, the project site and vicinity were in agricultural production. In 1986, a mass grading plan for the entire site was submitted, approved, and initiated (Mac Design Associates, 1997). Initial grading on-site consisted of clearing and grubbing of orchard trees and root structures. Surface material was scraped and placed in windrows. Investigations of prehistoric cultural resources were undertaken and grading resumed outside of fenced sensitive archaeological areas (Mac Design Associates, 1997). The project site was used as a staging area for fill during the Los Carneros Road/U.S. 101 interchange construction from approximately 1998 to 2014 (Mac Design Associates, 1997). Currently, the project site consists of 13 undeveloped lots located between developed commercial and industrial uses to the east and undeveloped land to the west (site of the Villages at Los Carneros). There is no structural development on site; however, construction equipment and containers are stored on site.

The following describes the potential for presence of hazardous materials (at the project site) and the potential risks associated with UPRR, U.S. 101, nearby businesses using hazardous materials, and a natural gas line (off-site).

Hazardous Materials and Substances. The term "hazardous material" refers to both hazardous substances and hazardous waste. A material is identified as "hazardous" if it appears on a list of



hazardous materials prepared by a Federal, State, or local regulatory agency or if it has characteristics defined as hazardous by such an agency. A “hazardous waste” is a “solid waste” that exhibits toxic or hazardous characteristics. The United States Environmental Protection Agency (U.S. EPA) defines the term “solid waste” to include many types of discarded materials including any gaseous, liquid, semi-liquid, or solid material, which is discarded or has served its intended purpose, unless the material is specifically excluded from regulation. Such materials are considered waste whether they are discarded, reused, recycled, or reclaimed. U.S. EPA classifies a material as hazardous if it has one or more of the following characteristics at specific thresholds: ignitability, corrosivity, reactivity, and/or toxicity.

As part of the Phase I ESA (Property Solutions Incorporated 2014; refer to Appendix F), a site reconnaissance was conducted in order to observe existing site conditions and to obtain information indicating the possible presence of recognized environmental conditions (REC) in connection with the project site. During the site reconnaissance, Property Solutions did not observe any of the following on-site: aboveground storage tanks (ASTs) or evidence of underground storage tanks (USTs); transformers, capacitors or large switch gear equipment; evidence of fuel release; evidence of hazardous waste generation, storage, or disposal; wells, sumps, pits, or floor drains; surface water bodies (e.g. springs or swamps); lagoons, ponds, septic systems, or separators; stressed vegetation, staining, or odors; superficial disturbances; dry cleaning operations; buildings; wetland areas; or major air emission sources. On the central portion of the Project site, the Phase I ESA noted that it was occupied by several temporary trailers and stored equipment associated with the recent construction of the apartment complex to the south-southeast. Chemicals stored on the Project site are minimal quantities of domestic cleaning chemicals and paints. No hazardous materials were observed within the temporary construction site at the northwest property corner, and approximately 30 five-gallon paint containers and two 5-gallon containers of caulk were observed stored near the trailers at the center of the site. A portable diesel-fired emergency generator was also present. Although some minor paint spillage was observed, no evidence of a fuel release was observed.

In addition to the site reconnaissance, Property Solutions contracted with Environmental Data Resources, Inc. (EDR) to search public databases of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred. The EDR search was conducted for the Project site and included data from surrounding sites within a one mile radius of the property. Table 4.7-1 displays the database information, which is divided into two columns. The first column lists sites identified within one mile of the Project site. These sites are described further in the text below. Table 4.7-1 also includes observations on the Project site, as described in the above paragraph. These observations are identified as *Project site* in the *Search Distance* column.

Although the exact locations of the orphan sites are frequently unknown, the Phase I ESA attempts to evaluate the potential adverse environmental impact that these sites may have on the Project site. The orphan sites included in the following table are those the Phase I ESA identified as potentially located within the identified search distance.



**Table 4.7-1
Environmental Database Summary**

Database	Search Distance	Plottable¹
National Priorities List	1 Mile	0
State/Tribal Hazardous Waste Sites	1 Mile	6
RCRA Corrective Action Treatment/Storage/ Disposal (TSD) Facilities (CORRACTS)	1 Mile	2
Delisted National Priorities List	½ Mile	0
CERCLIS Sites	½ Mile	0
CERCLIS No Further Remedial Action Planned (NFRAP) Sites	½ Mile	2
RCRA Non-Corrective Action TSD Facilities	½ Mile	2
State/Tribal Voluntary Cleanup Sites	½ mile	0
State/Tribal Brownfield Sites/CERCLIS Equivalent	½ mile	0
State/Tribal Leaking Registered Storage Tank Sites	½ Mile	19
State/Tribal Solid Waste Landfill Sites/Facilities	½ Mile	0
Historic Landfills	½ Mile	0
Federal/State/Tribal Engineering Controls Registries	½ Mile	0
Federal/State/Tribal Institutional Controls Registries	½ Mile	0
RCRA Large Quantity Generators	Project site and Adjoining Properties	0
RCRA Small Quantity Generators	Project site and Adjoining Properties	0
State/Tribal Registered Storage Tank Sites	Project site and Adjoining Properties	0
Manifest	Project site	0
Spill/Release Sites	Project site	10
Facility Index System (FINDS)	Project site	0
Emergency Response Notification System	Project site	0

1: Identifies the number of sites with location information. These are in contrast with “orphan sites, which potentially lie within the search distance but could not be located by EDR due to incomplete and/or inaccurate address information in the U.S. EPA/ State databases. No orphan sites were identified in the EDR search.

Source: Phase I Environmental Assessment, Property Solutions, Inc., Sept. 2014; Environmental Database used was dated July 29, 2014.

As a follow-up to the database search and the site reconnaissance, the Phase I ESA reviewed the following reports and correspondence related to historical import and export of fill material to and from the Project site.

- *Phase I Environmental Site Assessment report prepared by Dames & Moore on April 2, 1999 – This report noted the presence of large piles of fill soil on the Project site. The source of the fill was not identified. No discolored soil was noted. Dames & Moore did not identify the fill as a recognized environmental condition, and made no recommendations for further action.*
- *Report of Soil Removal prepared by Earth Systems Pacific on August 12, 2004 – This report documents the removal of approximately 130 cubic yards of hydrocarbon-contaminated soil (diesel fuel or fuel oil) that had been deposited on the Project site. The removal action included the collection and analysis of post-excavation soil samples in order to evaluate the adequacy of the remedial action. A total of 400*



cubic yards of soil was transported for off-property disposal. Earth Systems Pacific concluded that the remedial action was adequate.

- *Soils Material Report prepared by Earth Systems Pacific on July 20, 2010 – This report noted a “slight hydrocarbon odor” in the logs for all five soil borings advanced on the southwestern arm of the Project site for geotechnical engineering purposes. Earth Systems Pacific’s A-A’ cross section, which extends for more than 600 feet from northeast to southwest across the investigated area, identifies a “slight hydrocarbon odor” from an upper depth of 10 to 15 feet below ground extending to a lower depth of 16 to 25 feet below ground surface. Earth Systems Pacific’s B-B’ cross section, which extends for more than 800 feet from north to south across the investigated area, also identifies a “slight hydrocarbon odor” from an upper depth of 10 to 15 feet below ground extending to a lower depth of 16 to 25 feet below ground surface.*
- *Soil and Groundwater Investigation Report prepared by Geosyntec Consultants in June 2012 – This report noted that concentrations of detected pesticides were below California Human Health Screening Levels for residential land use, and concentrations of arsenic were below the Department of Toxic Substances Control’s background standard for Southern California. No further mitigation was recommended.*
- *Geotechnical Engineering Report prepared by Earth Systems Pacific on July 8, 2014 – This report noted that groundwater on the Project site occurred at depths as shallow as 22.5 feet below ground surface.*
- *Results of Soil Analysis, Northwest Stockpile prepared by Earth Systems Pacific on August 1, 2014 – This report noted the presence of stained and odorous soils, which, in their estimation, might render the soil undesirable for use at a property that is to be developed as a school, hospital, or residence. After laboratory analysis, Earth Systems Pacific reported that the analysis did not identify concentrations of target compounds that would preclude the use of the soils for fill at properties proposed for other uses (note: these soils are proposed to be exported from the site as part of the project).*

Aerial photographs of the site over time were also analyzed as part of the Phase I ESA. The photos and maps reviewed demonstrate that the portions of the site were in use as orchards and citrus groves from at least 1928 through 1973. After 1973, the entire site existed as undeveloped land until possible fill and the current access road were added between 1994 and 2005. According to the California Department of Toxic Substances Control’s (DTSC’s), Interim Guidance for Sampling Agricultural Properties, organochlorine pesticides (OCPs) were first introduced into California agriculture in 1944 and reached peak usage in the 1960s. DDT was banned from agricultural use in 1974, and the remaining OCPs in California agriculture were subsequently banned. Data gathered by DTSC from sites where agricultural use ended before to 1950 indicates that OCPs were not identified as chemicals of potential concern. In those cases, where OCPs were identified, the source appears to have been the application to structures on the property, and not the agricultural crops grown prior to 1950. Various areas of the Project site have experienced the delivery and removal of OCP contaminated soils over a period of years, and hydrocarbon-impacted soils remain. The use of lead arsenate and petroleum-based pesticides on fruit trees in California dates to the 1930s. The original ground surface from that time has been covered by fill, which mitigates the potential for direct contact under present conditions. Based on samples collected on the southerly contiguous non-subject Willow Springs II property that historically had the same orchards on site, pesticide and arsenic residues in soil on the project site would have



concentrations below residential and background standards as identified on the Willow Springs II property and reported in the Phase I ESA prepared by Property Solutions, Inc.

The Phase I ESA found no evidence of recognized environmental conditions in connection with the Project site. This conclusion indicates that the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property was not found beyond a de minimis (negligible) condition. However, the project site is located immediately south of U.S. 101, the Union Pacific Railroad, a high-pressure natural gas line on Hollister Avenue, and near a number of industrial businesses to the east, all of which would potentially be the source of accidental releases of hazardous materials. The General Plan EIR identifies these risks as unavoidably significant impacts.

Radon Gas. Radon is an odorless and tasteless, naturally occurring gas that has been linked to lung cancer. Radon exists in all soils throughout the United States and is produced from the breakdown of naturally occurring radium and uranium within the ground.

Radon gas studies performed by the California Bureau of Mines and Geology and the Department of Health Services (DHS) through 1995 indicate that Santa Barbara County falls within the Zone 1 designation, which suggests that there is a low to moderate potential for exposure to radon gas at or above the EPA recommended level of 4.0 pico curies per liter (pCi/L) (City of Goleta, 2007). The Radon Zone Map for Santa Barbara County produced by the Bureau of Mines and Geology indicates that the Project site falls within the low potential area for indoor radon levels above 4.0 pCi/L (California Bureau of Mines and Geology 1995).

Proximity to the Union Pacific Railroad. The Project site is located immediately adjacent and to the south of the UPRR right-of-way. The railroad carries passenger cars as well as freight trains. Currently the only through train carrying hazardous materials is a unit train (a train with all cars carrying the same commodity) transporting crude oil in tank cars to refineries in the Los Angeles area that runs one to two days per week (Cuesta Pass Rails, 2015). However, it is possible that additional through trains transporting freight, including hazardous materials, could run in the future as they have in the past. Nothing prevents additional through trains carrying hazardous materials from using the rail lines, and no additional agency approvals would be required for this to occur. In addition, local trains deliver freight, including hazardous materials, to industry in the local area. Approximately four local trains hauling freight pass by the project site weekly (Cuesta Pass Rails, 2015). Issues associated with the site's proximity to the railroad include the potential for an accident (a derailment in particular) that could result in the release of hazardous material which in turn could result in a toxic and/or flammable gas could, fire, and/or explosion. The associated public health risk depends upon the materials released during an accident, the toxicity of the materials, and the wind direction that may carry the emissions from the release toward any occupied uses.

Proximity to U.S. 101. U.S. 101 is located north of the Project site, separated by the UPRR right-of-way and the on-ramp from S. Los Carneros Rd. Some of the truck traffic on U.S 101 involves transport of hazardous materials. Issues associated with the site's proximity to U.S 101 include the potential for a truck accident that could result in the release of hazardous material or ignition of a fire. The associated public health risk depends upon the materials released during an accident, the toxicity of the materials, and the wind direction that may carry the emissions from the release toward any occupied uses.

Industrial Businesses. Hazardous Materials Unit (HMU) of the Santa Barbara County Public Health Department is certified by CalEPA as the Certified Unified Program Agency (CUPA) for Santa



Barbara County. The CUPA regulates businesses that handle hazardous materials, generate or treat hazardous waste or operate aboveground or underground storage tanks.

Proximity to a High Pressure Natural Gas Line. A 16-inch diameter underground Southern California Gas Company high-pressure natural gas pipeline runs along the north side of Hollister Avenue from the west to about half way between S. Los Carneros Road and Cremona Drive where it turns south across Hollister Avenue away from the Project site. This pipeline runs within approximately 1,800 feet of the southwest corner of the property. This pipeline transports flammable, non-toxic natural gas. Issues associated with the site's proximity to the pipeline involve the potential for an accident that could result in the release and ignition of flammable gas. Because of the 1,800 feet separation distance, this pipeline does not present a hazard to the Project and therefore, is not addressed further in this study.

b. Hazardous Material Regulation. The management of hazardous materials and hazardous wastes is regulated at federal, State, and local levels through programs administered by U.S. EPA, agencies within the California Environmental Protection Agency (CalEPA) such as the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB), U.S. Department of Transportation (DOT), California Highway Patrol, federal and State Occupational Safety and Health agencies (OSHA), and Office of Emergency Services (OES). An overview of the regulation of hazardous materials is provided below. A more detailed discussion of hazardous material regulation can be found in Appendix F.

In California, the U.S. EPA has granted most enforcement authority over federal hazardous materials regulations to the Cal EPA. In California, regional agencies are responsible for programs regulating emissions to the air, surface water, and groundwater. At the project site, the Santa Barbara County Air Pollution Control District has oversight over air emissions, the Central Coast Regional Water Quality Control Board (Central Coast RWQCB) has jurisdiction over the City and regulates discharges and releases to surface and groundwater, and the County of Santa Barbara Hazardous Material Unit oversees programs involving storage and handling of hazardous materials. Oversight for investigation and remediation of sites affected by hazardous materials releases can be performed by state or local agencies, such as the DTSC, the State Water Resource Control Board, or the County Public Health Department. The Resource Conservation and Recovery Act (RCRA) is the United States' primary law governing the handling and disposal of hazardous waste. The RCRA, adopted in 1976, set out to ensure that wastes are managed in an environmentally sound manner.

Some businesses located near the Project site store and use hazardous materials. The owners of these facilities are required by law to prepare a Hazardous Materials Business Plan that lists the hazardous materials stored and their volumes and locations and submit the Plan to the Santa Barbara County Public Health Department when beginning to store such materials. This information is then provided to emergency response agencies so they are aware of the type of materials stored on site when responding to an emergency at that location. Therefore, a list of the current hazardous materials stored and used at these businesses is available to the public. However, businesses can change or add to the hazardous materials (except for "acutely hazardous"¹ materials in quantities above prescribed thresholds) that they

¹ 40 CFR §261.11.(a)-(2) allows the EPA administrator to classify hazardous waste, in part as follows: "It has been found to be fatal to humans in low doses, or in the absence of data on human toxicity, it has been shown in studies to have an oral LD 50 toxicity (rat) if less than 50 milligrams per kilogram, an inhalation LC 50 toxicity (rat) of less than 2 milligrams per liter, or a dermal LD 50 toxicity of less than 200 milligrams per kilogram or is otherwise capable of causing or significantly contributing to an increase in serious irreversible, incapacitating reversible, illness. (Waste listed in accordance with these criteria will be designated Acute Hazardous Waste.)"



store and use without additional regulatory review or approval as long as they comply with the applicable laws and regulations. In addition, new businesses could replace existing businesses without the need for any additional regulatory review or approval as long as they comply with the applicable laws and regulations, including the preparation of a Business Plan if they plan to handle hazardous materials. Additional building and fire department permits are required if additional tanks are to be constructed to store hazardous materials. Additional approval/update to a Hazardous Materials Business Plan is only required to allow for the storage of acutely hazardous materials above the prescribed threshold. A business must prepare and submit a Risk Management Plan (RMP) under the California Accidental Release Prevention (CalARP) Program to Santa Barbara County Hazardous Materials Unit for review and approval before such materials can be delivered to the site.

The County of Santa Barbara administers a number of federal and State laws and regulations at the local level. In addition, the California Fire Code and California Building Code include requirements pertaining to hazardous materials and hazardous wastes, which are monitored and enforced at the local level.

As discussed in the Section 4.7.1(a), the Santa Barbara County HMU regulates businesses that handle hazardous materials, generate or treat hazardous waste, or operate storage tanks with hazardous materials. As the County CUPA, the HMU regulates businesses that handle hazardous materials, generate or treat hazardous waste or operate aboveground or underground storage tanks. The primary goal of the CUPA Program is to protect public health and the environment by promoting compliance with applicable laws and regulations. All inspectors in the County of Santa Barbara CUPA Program are trained Hazardous Materials Specialists who take part in continuous education program to ensure consistency and uniformity during inspections.

The overall CUPA requirements are found in Health & Safety Code (HSC) Chapter 6.11 and California Code of Regulations (CCR), Title 27, Division 1, Subdivision 4, Chapter 1. The County of Santa Barbara CUPA is responsible for the following six consolidated environmental programs:

- *Hazardous Materials Release Response Plans & Inventory (“Business Plan”) - Authority: HSC Chapter 6.95, Article 1 & Title 19 CCR Chapter 4;*
- *Underground Storage Tanks (UST) - Authority: HSC Chapter 6.7 & Title 23 CCR, Division 3, Chapters 16 & 17;*
- *Hazardous Waste Generators - Authority: HSC Chapter 6.5 & Title 22 CCR Division 4.5;*
- *Onsite Hazardous Waste Treatment (“Tiered Permit”)- Authority: HSC Chapter 6.5 & Title 22 CCR Division 4.5;*
- *Aboveground Petroleum Storage Act (APSA) Authority: HSC Chapter 6.67;*
- *California Accidental Release Prevention (“CalARP”) - Authority: HSC Chapter 6.95, Article 2 & Title 19 CCR Chapter 4.5*

Each of these programs is discussed in detail in Appendix F.

Transportation of Hazardous Materials. The transportation of hazardous materials is regulated by the Federal Department of Transportation (DOT) and the California Department of Transportation (Caltrans). These regulations are discussed in Appendix F.

Storage and Handling of Hazardous Materials. The storage and handling of hazardous materials is regulated by a number of agencies, including federal OSHA, federal DOT, California OSHA, and Santa



Barbara County. Federal OSHA regulates the storage and handling of hazardous materials, including container specifications, safety release devices, inspection requirements, and handling requirements. Federal DOT regulations require that shippers of hazardous materials use appropriate containers and label the contents as required by law. California OSHA, under General Industry Safety Orders, specifies requirements for hazardous materials storage and handling and references both federal OSHA requirements and industry recommendations. The Santa Barbara County Fire Department periodically inspects facilities to ensure that they are storing hazardous materials correctly and have proper safety measures in place.

Hazardous Materials Business Plan. The Business Plan Program requires businesses that handle hazardous materials in quantities in excess of specified quantities to submit inventories of those materials to the CUPA, and to develop appropriate employee training and emergency procedures. The thresholds are:

- *55 gallons for a liquid*
- *500 pounds for a solid*
- *200 cubic feet (at standard temperature and pressure) for a gas*

The CUPA maintains the inventory and emergency contact information submitted from businesses in a computerized data management system. The CUPA, in turn provides this information to emergency response agencies.

4.7.2 Impact Analysis

a. Methodology and Significance Thresholds. The City of Goleta's Environmental Thresholds and Guidelines Manual contains thresholds for assessing the significance of impacts to public safety resulting from the involuntary exposure to hazardous materials. The manual establishes categories for identifying potential significant impacts to public safety including transportation of hazardous materials, as well as potentially significant impacts to non-hazardous land uses proposed in proximity to existing hazardous facilities. The manual specifically identifies a potentially significant impact to all development proposed in proximity to one or more existing hazardous facilities.

CEQA Guidelines Section 15126.2(a) provides guidance regarding consideration and discussion of significant environmental impacts related to hazards:

- *The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the affected area.*
- *The EIR should evaluate any potentially significant impacts of locating development in areas susceptible to hazardous conditions as identified in authoritative hazard maps, risk assessments or land use plans addressing such hazards.*

Appendix G of the CEQA Guidelines contains a checklist of environmental factors to be assessed to determine the potential for significant impacts. Based on this checklist, the Project's impact would be significant if it exceeds the following thresholds.

1. *The Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.*



2. *The Project would 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. *The Project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.*

Impacts related to airport safety and emergency evacuation would not be significant and are addressed in Section 4.15, *Effects Found Not to be Significant*. Wildland fire issues are discussed in Section 4.11, *Public Services*. Potential impacts associated with hazardous emissions are discussed in Section 4.2, *Air Quality*.

b. Project Impacts and Mitigation Measures.

Impact HAZ-1 Hazardous materials may be present in the soils on the Project site and adjoining properties. However, due to the depth of potentially contaminated soils and required compliance with local and regional regulations, impacts would be Class III, less than significant [Threshold 1 and Threshold 3].

As discussed in Section 4.7.1, *Setting*, as part of the Phase I ESA conducted for the Project site, a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred was conducted for the Project site and included data from surrounding sites within a one mile radius of the property. The Project site and adjoining properties were not listed in any of the databases searched by EDR. Based on standard sources reviewed and site observations, releases of chemicals of concern may have occurred on the Project site and has occurred on adjacent properties. However, contaminated soils are at a depth that eliminates potential impacts (Property Solutions Inc., 2014). In addition, the location of contaminated soils has been identified and these soils are proposed to be exported prior to Project construction, as described in Section 2.0, *Project Description*.

The documentation reviewed as part of the Phase I ESA concluded that various areas of the Project site have experienced the delivery and removal of contaminated soils over a period of years. The following provides a summary of documentation reviewed and action taken for imported fill on the Project Site:

- In its Phase I Environmental Site Assessment report dated April 2, 1999, Dames & Moore noted the presence of large piles of fill soil on the Project site. The source of the fill was not identified and no discolored soil was noted. Dames & Moore did not identify the fill as a recognized environmental condition, and made no recommendations for further action.
- In its Report of Soil Removal dated August 12, 2004, Earth Systems Pacific documented the removal of approximately 130 cubic yards of hydrocarbon-contaminated soil (diesel fuel or fuel oil) that had mistakenly been deposited on the Project site. The removal action included the collection and analysis of post-excavation soil samples in order to evaluate the adequacy of the remedial action. A total of 400 cubic yards of soil was transported for off-property disposal. Earth Systems Pacific concluded that the remedial action was adequate.



- In its Soils Material Report dated July 20, 2010, Earth Systems Pacific noted a “slight hydrocarbon odor” in the logs for all five soil borings advanced on the southwestern arm of the Project site for geotechnical engineering purposes. Earth Systems Pacific’s A-A’ cross section, which extends for more than 600 feet from northeast to southwest across the investigated area, identifies a “slight hydrocarbon odor” from an upper depth of 10 to 15 feet below ground extending to a lower depth of 16 to 25 feet below ground surface. Earth Systems Pacific’s B-B’ cross section, which extends for more than 800 feet from north to south across the investigated area, also identifies a “slight hydrocarbon odor” from an upper depth of 10 to 15 feet below ground extending to a lower depth of 16 to 25 feet below ground surface. As described above, this was determined to be a de minimis finding (negligible impact) in the Phase I ESA (September 2014).
- In its Geotechnical Engineering Report dated July 8, 2014, Earth Systems Pacific noted that groundwater on the subject property occurred at depths as shallow as 22.5 feet below ground surface.
- In its Results of Soil Analysis, Northwest Stockpile dated August 1, 2014, Earth Systems Pacific noted the presence of stained and odorous soils, which, in their estimation, might render this soil (proposed to be exported) undesirable for use at a property that is to be developed as a school, hospital, or residence. Earth Systems Pacific reported that laboratory analysis did not identify concentrations of target compounds that would preclude the use of the soils for fill at properties proposed for other uses less sensitive than uses such as a school, hospital, or residence.

On the basis of the documentation reviewed, Property Solutions concluded that because of its depth, the soil that was noted with a “slight hydrocarbon odor,” appears to be de minimis (negligible) in its potential impact. This soil generally does not present a threat to human health or the environment and typically would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. In addition, the location of contaminated soils has been identified and these soils are proposed to be exported prior to Project construction, as described in Section 2.0, *Project Description*. The management of the imported soils documented on the Project site is ongoing and would be subject to regulatory requirements of the City of Goleta (grading permits) and the Regional Water Quality Control Board (RWQCB), including the preparation of an associated Soil Management Plan that includes controls on the use and placement of the exported soils to reduce potential risks from exposure to potential contaminants in the soil. Compliance with these regulatory requirements (grading permit and RWQCB permit including a Soil Management Plan) would ensure that potential impacts related to contaminated soils would remain less than significant.

Mitigation Measures. Mitigation would not be required because no significant impacts have been identified.

Residual Impact. Impacts would be less than significant without mitigation.



Impact HAZ-2 Implementation of the Project would place residential structures and persons in proximity to existing businesses that use, store, and transport hazardous chemicals, as well as transport of hazardous materials on the existing UPRR railroad tracks and U.S. 101. Onsite residents would therefore be exposed to a potential risk of upset associated with chemical leaks and fire from nearby businesses, derailed trains, and truck accidents. Although the probability of such incidents would be low, this impact would be Class I, *significant and unavoidable [Threshold 2]*.

Proposed residential structures and future residents on the project site would be located in proximity to several types of facilities in which hazardous materials are used, stored, or transported: nearby businesses, the UPRR railroad tracks, and the U.S. 101 freeway. Each type of facility is discussed below.

Nearby Businesses

A mix of commercial and industrial businesses is located directly east of the Project site in the General Industrial zone district. Specific types of businesses in this area include software development, electric parts supplier, hardware store, property management, and automotive repair. Types of hazardous materials stored and used in these facilities consist mainly of oils and other lubricants, as identified in the Phase I report for the project site by Property Solutions, Inc.

As discussed in the Section 4.7.1(a), the Santa Barbara County HMU regulates businesses that handle hazardous materials, generate or treat hazardous waste, or operate storage tanks with hazardous materials. As the County CUPA, the HMU promotes compliance with applicable hazardous material laws and regulations.

The HMU's Business Plan Program requires businesses handling hazardous materials in quantities in excess of specified amounts to submit inventories of those materials and to develop appropriate employee training and emergency procedures. For such businesses, including those in close proximity to the Project site, the HMU requires preparation and filing of a Business Plan and Emergency Response Plan that ensures that all nearby hazardous materials are handled appropriately to minimize potential health and environmental effects. The HMU also maintains the inventory and emergency contact information submitted from businesses in a computerized data management system and, in turn, provides this information to emergency response agencies.

In April 2016, the HMU provided an updated list of businesses located within 1/4-mile of the project site that use potentially hazardous chemicals. As shown in Table 4.7-2, a number of light-industrial and commercial uses in the vicinity of the project site use hazardous chemicals in the course of operation.



**Table 4.7-2
 Businesses that Use Hazardous Materials within 1/4-Mile of the Project Site**

Business Name	Address
Advanced Automotive	74 Aero Camino B
AT&T Mobility	6485 Calle Real
California Highway Patrol	6465 Calle Real
Channel Island Marine	74 Aero Camino
Delta Welding and Fabrication, Inc.	36 Aero Camino
Enerpro, Inc.	99 Aero Camino
Get Real Performance	92 Aero Camino
Goleta Transmission	74 Aero
Goleta, City of	130 Cremona Drive B
M3 Precision/Sornesen Precision	57 Aero Camino
Santa Barbara Motorsports	6466 Hollister Avenue
Viscarra's Refinishing	6485 Calle Real G

Source: Santa Barbara County Environmental Health Department, April 2016.

The requirement that businesses prepare and submit Business Plans to Santa Barbara County means that the HMU and the Fire Department is aware of the hazardous materials that are stored at these businesses, where they are stored, and in what quantities. Fire Department personnel periodically visit the facilities to become more familiar with them. All businesses submitting Business Plans are also required to prepare and submit emergency/contingency response plans. Hence, all businesses are required to be prepared to take immediate action in the event of an incident. Fire Department personnel are required to also be prepared to take action based on the Business Plan. Businesses are required to update their Business Plans whenever major changes occur such as the addition of another hazardous material. In addition, a business would be required to apply for permits if a storage tank is to be added. Such an application would be reviewed by the building and fire departments before a permit would be issued. This would ensure that all codes are met and that additional mitigation measures are implemented as deemed necessary.

The laws and regulations in place mitigate the potential to the maximum extent feasible. In addition, in the event of an accident, the requirement for pre-planning and emergency response plans reduces the potential consequences of the accident. Nevertheless, it is not possible to completely eliminate the potential for accidents and there remains a low probability for a future hazardous material release at any of the nearby facilities that store and use hazardous materials. Such a release could potentially affect the project site and site residents due to exposure to toxic fumes, explosions, or fire.

UPRR Rail Line

As discussed in Section 4.7.1, a unit train transporting crude oil travels along the UPRR adjacent to the project site one to two times per week. In addition, local trains deliver freight, including hazardous materials to businesses located in the area. These trains operate in the Goleta area approximately four times per week. Trains hauling empty auto cars and container cars travel south along the route approximately once per day and a train hauling empty oil tank cars travels north one to two times per week (Cuesta Pass Rails, 2015). However, it is possible that additional through trains transporting freight, including hazardous materials, could run in the future as they have in the past. Nothing



prevents additional through trains carrying hazardous materials from using the rail lines, and no additional agency approvals would be required for this to occur. The public health risk posed by an accidental release would depend upon the materials involved, their toxicity, and the wind direction that could carry emissions from the release. The prevailing weather pattern at the time of release would affect the rate of dilution and the direction of transport of any gaseous or volatilized materials.

Upset may also result from the explosion of highly volatile materials within the train cars or during a derailment. Because the project site is adjacent to the rail line, explosion and fire could pose a health risk in addition to that which could result from inhalation of volatile chemicals and fumes.

The potential impact can be evaluated only in terms of probabilities. The possibility of impact is determined by a combination of the probability of an accident, the probability that the released cargo is hazardous, and the probability that winds are blowing from the spill or release into the air toward occupied receptor sites. An analysis of the potential for a rail accident resulting in the release of hazardous material was recently completed on two projects located adjacent to the UPRR and approximately $\frac{3}{4}$ and $1\frac{1}{2}$ miles west of the project site (Envicom, 2011 and Rincon, 2014). The methodology used in these reports has been used to estimate the potential risk of local freight train accidents to the Project. Statistical data contained in two oil transportation studies, Washington State 2014 Marine and Rail Transportation Study (State of Washington, 2015) and U.S. Rail Transportation of Crude Oil: Background and Issues for Congress (Frittelli, et. al. 2014) were used to estimate the potential risk from the crude oil train to the Project.

Approximately six percent of total freight movement by rail in the United States in 2007 (the most current data available from the Office of Freight Management and Operations) consisted of hazardous materials (Office of Freight Management and Operations, 2012). The probability of a freight train accident over the 9-year period 2006 through 2014 was 1.6×10^{-5} (16 in one million) per mile of travel (Federal Railroad Administration Office of Safety Analysis 2015). The probability of a hazardous materials release given an accident during this time period was 2.0×10^{-3} (two in one thousand). Approximately four local freight trains per day operate on the tracks adjacent to the Project site. The risk of a rail accident with release of hazardous material within this one mile segment is calculated as follows:

- $4 \text{ trains per week} \times 52 \text{ weeks} \times 1 \text{ mile traveled near the Project site} \times 1.6 \times 10^{-5}$
(probability of accident per mile) $\times 2.0 \times 10^{-3}$ (probability of a hazardous materials
release given an accident) = 6.6×10^{-6} (once every 150,000 years)

Injuries or fatalities may be somewhat less than the calculated probability of an accident. People located inside their apartments may be shielded from the impacts of a fire. Buildings and walls may also provide protection from the radiant heat from a fire (Orange County, 2013).

The probability of a crude oil unit train accident is estimated to be between 0.81 and 2.08 accidents per billion ton-miles transported (State of Washington, 2015). A typical unit train carries approximately three million gallons. Assuming 1.5 unit trains per week, this equates to 234 million gallons of crude oil transported past the Project site annually. The weight of crude oil varies depending on the type, but crude oil generally weighs less than water. Assuming a conservative average weight of 7.5 pounds per gallon means that approximately 880,000 tons of oil are transported past the Project site annually. Assuming an accident rate of 2 accidents per billion ton-miles transported results in an annual probability of crude oil unit train accident with release within a half mile of the Project site (one mile



segment) of 3.6×10^{-6} or once every 275,000 years. Such an accident could result in a spill, a fire, and/or an explosion. A fire or explosion could impact the health and safety of people at the Project.

Based on this analysis, the risk of derailment with or without hazardous material release is statistically low. However, according to the Goleta General Plan FEIR (3.7-2 Transport), this potential impact cannot be mitigated to a less than significant level and remains significant with respect to rail traffic along the UPRR ROW, where the project site is located. The FEIR states that the potential impact “remains significant” and no feasible mitigation measures are available to reduce the level of significance. The City Council adopted a statement of overriding considerations with respect to this impact as part of its action in certifying the FEIR for the General Plan.

U.S. 101 Freeway

The annual average daily truck traffic (AADT) on U.S 101 at Los Carneros Road in 2014 was 5,922 (Caltrans 2015). This represented 9.0 percent of the total AADT. About half of these (49 percent) were trucks with five or more axles. In 2007, trucks transported the largest volume of hazardous materials through the nation’s transportation system, moving 1.2 out of 2.2 billion tons of hazardous materials. Approximately 13.7 percent of materials transported by truck were classified as hazardous (Bureau of Transportation Statistics, 2011). Table 4.7-3 shows the breakdown of hazardous materials shipped in trucks by hazard class.

The accident rate for trucks transporting hazardous materials is estimated to be 3.2×10^{-7} per mile (0.32 in one million) (Battelle, 2001). The vast majority of incidents involving truck releases will not impact resources located more than a few thousand feet from the place of the accident (see discussion below on the potential hazards from the various types of hazardous materials. To be conservative, the analysis has assumed that accidents that occur with a half mile of the project site (one mile segment) have the potential to impact the site. Thus, the probability of an accident involving a truck on U.S 101 within a one-mile segment adjacent to the Project is calculated as follows:

- *5,922 (truck AADT) x 365 (days per year) x 0.077 (percent trucks with hazardous materials) x 3.2×10^{-7} (accident rate per mile assumed for U.S 101) = 0.053 or one accident every 19 years*



**Table 4.7-3
Hazardous Materials Truck Shipment Characteristics by Hazard Class**

Hazard Class and Description	Tons (thousands)	% Total Tons	Ton-miles (millions)	Average miles per shipment	Probability of Release
Class 1, Explosives	3,047	0.14%	911	738	1.4×10^{-5} (once every 71,400 yrs)
Class 2, Gases	250,506	11.23%	55,260	51	1.1×10^{-3} (once every 890 yrs)
Class 3, Flammable liquids	1,752,814	78.56%	181,615	91	7.9×10^{-3} (once every 130 yrs)
Class 4, Flammable solids	20,408	0.91%	5,547	309	9.1×10^{-5} (once every 11,000 yrs)
Class 5, Oxidizers and organic peroxides	14,959	0.67%	7,024	361	6.7×10^{-5} (once every 14,900 yrs)
Class 6, Toxic (poison)	11,270	0.51%	5,667	467	5.1×10^{-5} (once every 19,600 yrs)
Class 7, Radioactive materials	515	0.02%	37	5	1.0×10^{-6} (once every 500,000 yrs)
Class 8, Corrosive materials	114,441	5.13%	44,395	208	5.1×10^{-4} (once every 1,950 yrs)
Class 9, Miscellaneous dangerous goods	63,173	2.83%	23,002	484	2.8×10^{-4} (once every 3,500 yrs)
Total	2,231,133	100.00%	323,457	96	0.01 (once every 100 yrs)

The probability of release for each class of hazardous materials is calculated by multiplying the total probability of release (0.01) by the % total tons for each class. For example, the probability of release for Class 1 is calculated by multiplying 0.01 times 0.0014 (0.14%) which equals 0.000014 (1.4×10^{-5}).

It should be noted that an accident involving a truck carrying hazardous material does not always result in the release of the material. The Federal Emergency Management Agency's (FEMA) *Handbook of Chemical Hazard Analysis Procedures* (1989) estimates that approximately half of accidents result in a release, including very minor valve and fitting leaks. Omitting minor release accidents, a spill may result from an accident about 15 percent to 20 percent of the time (FEMA, 1989). After applying the more conservative assumption of 20 percent, the probability of a truck accident releasing hazardous material on U.S 101 within one half mile of the project is $0.053 \times 0.2 = 0.01$, or once every 100 years.

The Project site is approximately 250 feet and 300 feet south of the southbound lane of the freeway at the eastern and western sides of the site, respectively. The potential impact from a truck accident with release would be dependent of the type and amount of material released. Table 4.7-3 presents the probability of release by cargo type. As can be seen from Table 4.7-3, the sum of the probabilities of the individual hazard classes presented below is 0.01 or once every 100 years. The consequence of each type is discussed below.

Class 1, Explosives. An event involving explosives could cause property damage on the Project site as well as injury and or death. The probability of a release of explosive material is 1.4×10^{-5} or once every 71,400 years (see Table 4.7-3).



Class 2, Gases. The probability of a release of a gas is 1.1×10^{-3} , or once every 890 years (see Table 4.7-3). For a gas release to impact the Project, the wind would have to be blowing from the north. In addition, the gas would either have to be flammable or toxic and enough material would have to be released to generate a hazardous cloud that could reach the site. If a flammable cloud were to be ignited immediately at the source of the release, then there would be no impact to the Project site. FEMA (1989) estimates that 63 percent of the gases transported are flammable. Assuming a probability of the wind blowing from the north at 50 percent, the probability of a release possibly reaching the Project site is 3.5×10^{-4} or once in 2,890 years. Even if a gas cloud were to reach the property, a person would not necessarily be impacted. A non-toxic flammable gas would not pose a hazard unless it becomes ignited. The impact from a toxic gas cloud would depend on the type of material, concentration, and sensitivity of the person to that material. One effective way of responding to a release of a toxic gas is to shelter in place. Buildings provide shelter against contaminants by three methods: condensation of vapors on exterior walls, passive filtering by the building material and structure, and providing a physical barrier to vapor/gas intrusion. In addition to providing a physical barrier and causing vapors to condense, building exteriors provide a “filter” for contaminants as surfaces, cracks and pores absorb the contaminants before they enter the building. Once those vapors/gases enter the building they are diluted by the uncontaminated air already in the building. In addition, since a structure slows the rate of vapor/gas infiltration the effects of fluctuations in concentration are reduced. This reduces the indoor concentration relative to the outdoor concentration (Governor’s Office of Emergency Services, 2014).

Class 3, Flammable liquids. The majority of materials transported by trucks are classified as flammable liquids. This class includes materials that are either flammable or combustible. The probability of a release of a Class 3 liquid is estimated to be 7.9×10^{-3} or once every 130 years (see Table 4.7-3). There are two potential hazards from a release of a flammable liquid: a fire at the release point creating radiant heat that can produce burns and, if not ignited, a flammable gas cloud that can move with the wind and become ignited someplace else. A pool fire at the point of the accident produces radiant heat that can cause burns. The intensity of the heat is dependent on the material on fire and the size of the area on fire. The intensity of the radiant heat decreases as a function of distance. The California Department of Education (CDE, 2007) estimates that the hazard zone that could begin causing second degree burns on exposed skin after 30 seconds exposure from a gasoline fire with a diameter of 100 feet (7,800 square feet) would extend to 200 feet. People located indoors or behind structures would be afforded some protection from the heat. People outdoors would feel the heat and naturally move away from it. Based on CDE estimates (2007) for a flammable gas cloud from a gasoline release to reach the Project site, the diameter of the release would have to be greater than 460 feet (166,200 square feet). A combustible material does not produce a flammable gas cloud because it does not produce enough flammable vapors at ambient temperature to become ignited (e.g., its flash point is high).

Class 4, Flammable Solids. The probability of a release of a flammable solid is 9.1×10^{-5} or once every 11,000 years (see Table 4.7-3). Flammable solids are normally more difficult to ignite than flammable liquids. In addition, because flammable solids do not spread like a liquid when released, if they become ignited the surface area on fire is relatively contained. Therefore, the radiant heat produced is normally lower than that of a flammable liquid and the area potentially impacted is lower.

Class 5, Oxidizers and Organic Peroxides. An oxidizer is a liquid or solid material that may, generally by yielding oxygen, cause or enhance the combustion of other materials. An organic peroxide is any organic compound containing oxygen (O) in the bivalent -O-O- structure. If an oxidizer or organic



peroxide is also explosive, flammable, or a gas it is classified as such and not as an oxidizer or organic peroxide. Thus, a release of such material can exacerbate the consequences of an accident involving other hazardous materials but a release without an explosive, flammable, or gas classification would not pose a hazard to the Project site. The probability of a release of a Class 5 material is 6.7×10^{-5} or once every 14,500 years (see Table 4.7-3).

Class 6, Toxic (poison). These are poisonous materials other than gases. The probability of a release of a Class 6 material is 5.1×10^{-5} or once every 19,500 years (see Table 4.7-3). Because these materials are not gases, they would only be a hazard if someone comes in contact with them or is very near them. A release of a Class 6 material should not impact the Project site.

Class 7, Radioactive Materials. Very little radioactive material is transported by truck (see Table 4.7-3). The probability of a release of a Class 7 material is 1.0×10^{-6} or once every 500,000 years. Therefore, the probability of an event involving radioactive materials would be one in one million.

Class 8, Corrosive Materials. These materials are considered to be hazardous because they corrode other materials that they may come in contact with. Because the freeway is located over 250 feet north of the Project site, on the far side of the railroad ROW, it is unlikely that the Project site would come into contact with corrosive materials in the event of a truck accident, and such materials do not present a hazard to the Project site.

Class 9, Miscellaneous Dangerous Materials. These are hazardous substances that do not fall into the other categories and include materials such as asbestos, air-bag inflators, self-inflating life rafts, and dry ice. The probability of a release of a Class 9 material is 2.8×10^{-4} or once every 3,500 years (see Table 4.7-3). Based on the type of materials in this class, a release is unlikely to impact the project site.

Based on this analysis, the risk of exposure to upset conditions from U.S. 101 is statistically low. Nevertheless, an accident involving hazardous materials on U.S. 101 could impact the surrounding population. According to the General Plan FEIR (3.7-2 Transport), this potential impact cannot be mitigated to a less than significant level by any of the General Plan policies and remains significant with respect to trucking, particularly along the U.S. 101 corridor, where the project site is located. The FEIR states that the potential impact “remains significant” and no feasible mitigation measures are available to reduce the level of significance. Therefore, the potential hazard represented by trucking on the adjacent U.S. 101 corridor is significant and unavoidable for future residents on-site. The City Council adopted a statement of overriding consideration with respect to this impact as part of its action in certifying the FEIR for the General Plan.

Risk of Upset Impact Summary

Based on the above discussion, the potential for a hazardous material release from area businesses, U.S. 101, and the UPRR is low. However, the potential consequences of such a release could be catastrophic, resulting in injury or death to project site residents. Based on the potentially catastrophic consequences of a release and consistent with the findings of the City’s General Plan FEIR, potential impacts related to the exposure of site residents to a hazardous material release are considered significant and unavoidable.

Mitigation Measures. As stated in the General Plan FEIR, mitigation is not available to address the risk of upset associated with train derailment on the UPRR ROW and truck accidents on U.S. 101. The project site is also potentially subject to hazardous material releases from nearby businesses.



Beyond existing regulations enforced by the County's Environmental Health Department, measures are not available to mitigate the risk of upset from these sources.

Residual Impact. Risk of upset impacts would remain significant and unavoidable due to the risks of a hazardous material release. To proceed with the Project, the City Council would need to adopt a statement of overriding considerations. Although mitigation is not available, the following conditions of approval are recommended regarding risk of upset.

- *The Applicant must develop a mitigation plan for evacuation procedures in the event of accident/release of hazardous materials. This plan must be approved by the Director of Planning and Environmental Review or designee before of the City issues a building permit.*
- *The Applicant must develop and provide leases for apartment units that provide notification of hazards associated with the Project's location, including UPRR, SU 101, and nearby businesses. Clauses for the leases must be approved as to form by the City Attorney and by the Director of Planning and Environmental Review, or designee, before the City issues a building permit.*
- *The Applicant must develop a notice to future property owners regarding the potential risks of upset to be reviewed and approved by the Director of Planning and Environmental Review and the City Attorney, and then recorded either as part of the Final Map or before of the City issues a building permit.*

c. Cumulative Impacts. The General Plan Final EIR identifies a significant and unavoidable cumulative hazards and hazardous materials risk of upset/exposure impact resulting from the inherent risk associated with the transport of hazardous materials along major transportation routes (including U.S. 101, and the Union Pacific railroad tracks). Significant hazards include the risk of a trucking or rail accident and subsequent release of hazardous materials.

Other hazards, including potential hazardous material releases from businesses, represent a significant and unavoidable impact on residents and have been identified in this EIR. The overall risk associated with the handling, storage, and transport of hazardous materials would be expected to increase following build-out of the General Plan as additional development is introduced in close proximity to major transportation routes and hazardous material users. The potential for exposure to hazards and hazardous materials as a result of an accidental release would be statistically low or very low. Nevertheless, the cumulative risk of such exposure associated with the introduction of additional population in close proximity to U.S. 101, the UPRR railroad tracks, and businesses that store and use hazardous materials, is considered significant and unavoidable and the Project's contribution would be considered cumulatively considerable (Class I).

Cumulative projects proposed in and around Goleta would have the potential to expose future area residents, employees, and visitors to hazards by developing and redeveloping areas that may have previously been contaminated. The magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. If lead-based paint and/or asbestos containing materials are found to be present in buildings planned for demolition or renovation, or in the case that soil and groundwater contamination are found to be present on sites of planned and future development, these conditions would be required to comply with



existing applicable local, state and federal regulations. Hazard evaluations would be completed on a case-by-case basis for future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including remedial action on contaminated sites, would address impacts related to these hazards and hazardous materials associated with future development in the City. Cumulative impacts related to soil and/or groundwater contamination would be less than significant and the Project's contribution would not be considerable. Given the scope of planned and pending projects as listed on Table 3-1 in Section 3.0, *Related Projects*, the majority of which are residential properties that do not utilize hazardous materials, significant cumulative public health or safety hazards are not anticipated with regard to contaminated sites.



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