4.7 HAZARDS AND HAZARDOUS MATERIALS

4.7.1 Introduction

This section describes existing and potential future hazards within the project area, including the potential for exposure to hazardous materials. This section is based primarily on the results of the Initial Site Assessment prepared for the project (ENGEO 2015) and a Limited Site Assessment Report (Crawford & Associates, Inc. 2016).

For purposes of this chapter, the term "hazardous materials" refers to both hazardous substances and hazardous wastes. A "hazardous material" is defined in the Code of Federal Regulations (CFR) as "a substance or material that ... is capable of posing an unreasonable risk to health, safety, and property when transported in commerce" (49 CFR 171.8). California Health and Safety Code Section 25501 defines a hazardous material as: "...any material that, because of its quantity, concentration, or physical, or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment."

No comments related to hazards and hazardous materials were received during public review of the Notice of Preparation.

4.7.2 Environmental Setting

As described in Section 4.5, "Geology and Soils," the project site is generally underlain by loamy alluvial soils that are well drained. The surface creeks in the project area generally flow from east to west. Groundwater is 13 to 25 feet below the ground surface (ENGEO 2015:7).

The nearest sensitive receptors to the project site are single-family residences located on properties adjacent to the project boundary along the length of the proposed multi-use trail. There are three schools within 0.25-mile of the project site: Saint Rose School (633 Vine Avenue), George Cirby Elementary School/Head Start Preschool (814 Darling Way), and Warren T. Eich Middle School (1509 Sierra Gardens Drive). George Cirby Elementary School and Warren T. Eich Middle School are operated by the Roseville City School District. The Head Start Preschool is operated by the non-profit Placer Community Action Council. Saint Rose School is operated privately.

WILDLAND FIRE HAZARDS

The Roseville Fire Department's (RFD's) Fire Prevention Division conducts fire code enforcement, plan review services, hazardous materials enforcement, fire cause investigation, and hazard abatement activities. The Fire Prevention Division includes a program objective to reduce the fire hazard to structures caused by weeds and grass on all vacant lots within the city, and to respond to fire hazard complaints within 10 working days.

The potential for wildland fire is influenced by three factors: the presence of fuel (i.e., vegetation), the area's topography (i.e., slope and elevation), and air mass (i.e., temperature, relative humidity, wind speed and direction, cloud cover, precipitation amount and duration, and the stability of the atmosphere). The City of Roseville has identified much of the undeveloped land adjacent to the project site as areas of concern for wildland fire (Exhibit 4.7-1). Wildfire response access points have been established in these areas to help the fire department locate entrance points onto undeveloped lands in

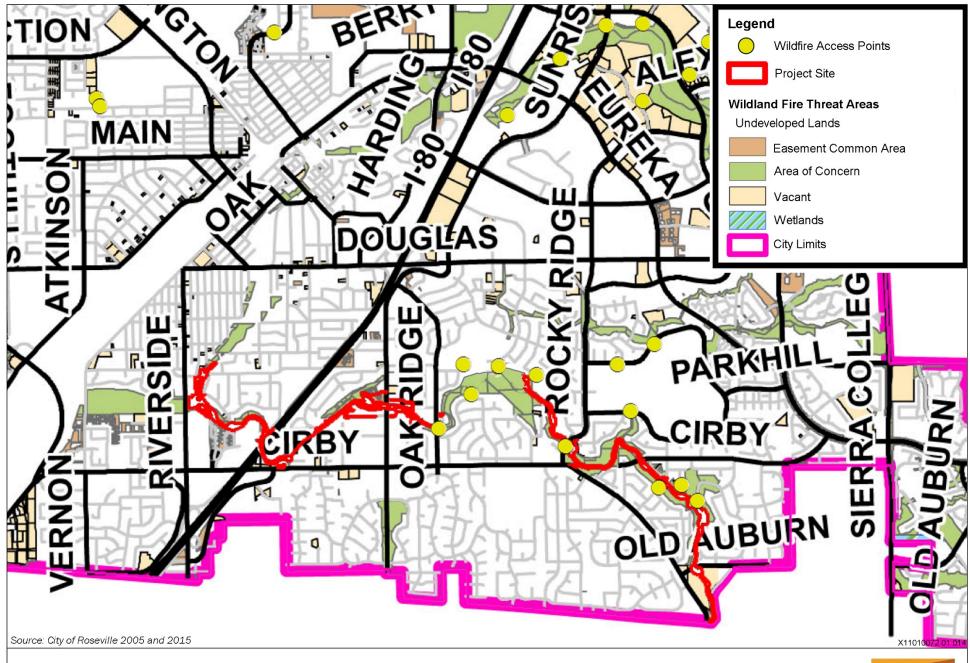


Exhibit 4.7-1

Wildland Fire Threat Areas



the event of a grass or wildland fire. Access points to the project site are located off Oak Ridge Drive, the western side of Eich Intermediate School, Sierra Gardens Drive, Meadow Lark Way, Rocky Ridge Drive, Champion Oaks Drive, Meadow Lane, and West Colonial Parkway (Exhibit 4.7-1). As a result of these planning efforts, wildland fires are typically easily accessible for firefighting apparatus and fires tend to be localized (City of Roseville 2005:14-10).

POTENTIAL SITES OF CONTAMINATION

The Initial Site Assessment (ENGEO 2015) did not identify any sites with recognized environmental conditions (i.e., sites with the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property because of any release to the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment) through review of public databases. In addition, no hazardous substances, petroleum products, aboveground storage tanks, or evidence of existing underground storage tanks (USTs) were observed during the site reconnaissance conducted as part of the Initial Site Assessment (ENGEO 2015).

Active buildings on properties designated for right-of-way acquisition include: 625 Riverside Avenue (auto sales), 641 Riverside Avenue (auto sales/smog/vehicle repair), 643 Riverside Avenue (auto sales), and 645 Riverside Avenue (commercial/industrial building). The building at 645 Riverside Avenue, which is currently vacant and has cinder block walls and large roll up doors, was constructed prior to 1971. There is evidence, including an old electrical panel, that another structure was historically located on this property. A small concrete pad and two pipes were noted adjacent to the south side of the building. In addition, a depression and concrete slab were visible at the southeast corner of the building. Underground storm or sewer manholes were noted along the eastern edges of 645 and 649 Riverside Avenue, along the bank of Dry Creek. According to RFD records, an unpermitted leach pit is located east of the building at 641 Riverside Avenue (ENGEO 2015).

A site assessment consisting of soil and groundwater sampling and a geophysical survey for USTs, product distribution piping, septic systems, and wells was conducted in 2016. This assessment found very low concentrations of motor fuel hydrocarbon-range compounds in soil samples and determined that effects on groundwater were unlikely. Metals were reported in all soil and groundwater samples at concentrations well below environmental screening limits and may represent background concentrations for the area. The geophysical survey did not identify any underground heating oil tanks, wells, and septic systems that were not detected in the site reconnaissance (Crawford & Associates Inc. 2016).

4.7.3 Regulatory Setting

The following federal, state, and local laws and policies related to hazards and hazardous materials apply to the proposed project.

FEDERAL

Federal laws require planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and if such materials are accidentally released, to prevent or mitigate injury to health or the environment. The U.S. Environmental Protection Agency (EPA) is the agency primarily responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations are primarily contained in CFR Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act of 1976 (RCRA) (42 U.S. Code [USC] 6901 et seq.) is the law under which EPA regulates hazardous waste from the time the waste is generated until its final

disposal ("cradle to grave"). EPA has authorized the California Department of Toxic Substances Control (DTSC) to enforce hazardous waste laws and regulations in California. Under RCRA, DTSC has the authority to implement permitting, inspection, compliance, and corrective action programs to ensure that people who manage hazardous waste follow state and federal requirements. Generators must ensure that their wastes are disposed of properly, and legal requirements dictate the disposal requirements for many waste streams (e.g., banning many types of hazardous wastes from landfills).

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act of 1986 (Public Law 99-499; USC Title 42, Chapter 116), also known as the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986, imposes hazardous materials planning requirements to help protect local communities in the event of accidental release. EPCRA requires states and local emergency planning groups to develop community emergency response plans for protection from a list of extremely hazardous substances (40 CFR 355 Appendix A). In California, EPCRA is implemented through the California Accidental Release Prevention Program.

Occupational Safety and Health Standards

The federal Occupational Safety and Health Administration (OSHA) is the agency responsible for assuring worker safety in the handling and use of chemicals identified in the Occupational Safety and Health Act of 1970 (Public Law 91-596, 9 USC 651 et seq.). OSHA has adopted numerous regulations pertaining to worker safety, contained in CFR Title 29. These regulations set standards for safe workplaces and work practices, including standards relating to the handling of hazardous materials and those required for excavation and trenching.

STATE

The primary state agencies with jurisdiction over hazardous materials management are DTSC and the Regional Water Quality Control Board. Other state agencies involved in hazardous materials management are the California OSHA (Cal/OSHA), the California Governor's Office of Emergency Services, California Department of Fish and Wildlife, Air Resources Board, California Department of Transportation (Caltrans), and California Integrated Waste Management Board.

California Public Resources Code Section 21151.4

California Public Resources Code Section 21151.4 requires the lead agency to consult with any school district with jurisdiction over a school within 0.25-mile of a project about potential impacts on the school if the project might reasonably be anticipated to emit hazardous air emissions, or handle an extremely hazardous substance or a mixture containing an extremely hazardous substance.

California Government Code Section 65962.5

California Government Code Section 65962.5 requires DTSC to compile and maintain lists of potentially contaminated sites located throughout the State of California. This "Cortese List" includes hazardous waste and substance sites from DTSC's database, leaking UST sites from the SWRCB's database, solid waste disposal sites with waste constituents above hazardous waste levels outside of the waste management unit, Cease and Desist Orders and Cleanup and Abatement Orders concerning hazardous wastes, and hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

In January 1996, the California Environmental Protection Agency adopted regulations implementing a Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The six program elements of the Unified Program are: hazardous waste generators and

hazardous waste on-site treatment, USTs, aboveground storage tanks, hazardous material release response plans and inventories, risk management plans, and Uniform Fire Code hazardous materials management plans and inventories. The program is implemented at the local level by a local agency – the Certified Unified Program Agency (CUPA). The CUPA is responsible for consolidating the administration of the six program elements within its jurisdiction. The Roseville Fire Department is the CUPA for the City of Roseville.

Hazardous Materials Release Response Plans and Inventory Law

The Hazardous Materials Release Response Plans and Inventory Law aims to minimize the potential for accidents involving hazardous materials and to facilitate an appropriate response to possible hazardous materials emergencies. The law requires businesses that use hazardous materials to provide inventories of those materials to designated emergency response agencies, to illustrate on a diagram where the materials are stored onsite, to prepare an emergency response plan, and to train employees to use the materials safely.

The California Health and Safety Code, Underground Storage Tank Regulations Chapter 6.7 of the Health and Safety Code outlines the requirements for USTs. The code identifies requirements for corrective actions, cleanup funds, liability, and the responsibilities of owners and operators of USTs.

Worker and Workplace Hazardous Materials and Worker Safety

Cal/OSHA is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA obligates many businesses to prepare Injury and Illness Prevention Plans and Chemical Hygiene Plans. The Hazard Communication Standard requires that workers are informed of the hazards associated with the materials they handle. For example, manufacturers are to appropriately label containers, material safety data sheets are to be available in the workplace, and employers are to properly train workers.

Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations within the state. Cal/OSHA standards are typically more stringent than federal OSHA regulations and are presented in Title 8 of the CCR.

Transport of Hazardous Materials and Hazardous Materials Emergency Response Plan

The State of California has adopted U.S. Department of Transportation regulations for the movement of hazardous materials originating within the state and passing through the state. State regulations are contained in Title 26 of the CCR. State agencies with primary responsibility for enforcing state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and Caltrans. Together, these agencies determine container types used and license hazardous waste haulers to transport hazardous waste on public roads.

The State of California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local governments and private agencies. Response to hazardous materials incidents is one part of the plan. The plan is managed by the Office of Emergency Services, which coordinates the responses of other agencies in the area.

California Fire Code

The California Fire Code (CFC) establishes standards for the storage of hazardous materials. The CFC also requires the fire chief to be notified immediately when an unauthorized discharge becomes reportable under state, federal, or local regulations. Section 503 of the CFC establishes requirements for fire apparatus access roads.

Caltrans Standards Specifications

The Federal Highway Administration is the National Environmental Policy Act (NEPA) lead agency for the project. Through a NEPA Assignment Memorandum of Understanding, Caltrans is serving the Federal Highway Administration's role as the NEPA lead agency. Therefore, the project would be required to comply with Caltrans' Standard Specifications. Section 14-11 includes regulations relating to hazardous waste and contamination. Specifically, Section 14-11.02 requires the immediate stop of work upon discover of unanticipated asbestos or a hazardous substance, Section 14-11.04 regulates dust control, and Section 14-11.5 regulates stock piling.

LOCAL

Roseville Multi-Hazard Mitigation Plan

The Roseville City Council adopted the Roseville Multi-Hazard Mitigation Plan (RMHMP) on July 20, 2005. The most recent update was submitted to California Governor's Office of Emergency Service in October 2016. This hazard mitigation plan update identifies resources, information, and strategies for reducing risk from natural hazards. The plan will help guide and coordinate mitigation activities throughout the City.

City of Roseville Fire Department Hazardous Materials Response Plan and Fire Prevention and Life Safety Standards

The RFD has primary responsibility for emergency response and is staffed with its own Hazardous Materials Response Team. RFD inspects and monitors facilities that are required to comply with federal and state regulations concerning inventory and reporting of hazardous materials.

The RFD has developed a Hazardous Materials Response Plan that describes organizational and operational responsibilities, including cleanup and decontamination procedures, in the event of a hazardous materials emergency. RFD has also published standards, which are adopted by the City Council and contained in the Roseville Municipal Code and Roseville Fire Code Ordinance that modify applicable state regulations.

The Emergency Vehicle Access standard provides guidelines pertaining to the creation and maintenance of fire department access roadways required by Section 503 of the 2013 CFC, as amended by local ordinance. Access plans must be submitted as part of the civil improvement package, and construction is prohibited until the plans have been approved.

City of Roseville Design and Construction Standards

The City of Roseville's Design and Construction Standards (last amended in April of 2015) provide a reference to the City's requirements for the design and construction of civil improvement projects, which are to be dedicated to the public and accepted by the City for maintenance or operation, and to provide for coordinated development of those facilities to be used by and for the protection of the public.

City of Roseville Guidance for Stormwater Quality Best Management Practices Control of construction site stormwater runoff is required by the NPDES stormwater permit that the SWRCB issued the City in 2013. The *West Placer Storm Water Quality Design Manual* (Placer County et al. 2016) is designed to facilitate compliance with the City's Stormwater Management Plan. The manual includes a discussion specific to pre-construction evaluation of potential for existing soil or groundwater contamination and appropriate selection of design measures.

See Section 4.8, "Hydrology and Water Quality," for additional discussion of stormwater pollution prevention plan requirements and best management practices.

City of Roseville Emergency Operations Plan

The City of Roseville Emergency Operations Plan addresses planned response to extraordinary emergency situations associated with natural disasters, technological (human-caused) emergencies, and war emergency operations in, or affecting, the City of Roseville. The plan establishes an emergency management organization and the emergency operations center for field response. It is designed to guide users through emergency preparedness, response, recovery, and mitigation.

4.7.4 Impacts

METHODS OF ANALYSIS

This analysis is based on the results of the Initial Site Assessment (ENGEO 2015) and analysis of site conditions. Potential impacts resulting from project construction and use were determined by evaluating the relative potential for a hazardous condition to result from project implementation and the sensitivity of potential receptors to such conditions.

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines, the proposed project was determined to result in a significant impact because of 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 or acutely hazardous materials, substances, or wastes within 0.25-mile of an existing or proposed school;
- be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- for a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport of public use airport, result in a safety hazard for people residing or working in the project area;
- ✓ for a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area;
- impair implementation of, or physically interfere with, an adopted emergency evacuation plan or emergency response plan; or
- expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are located adjacent to urbanized areas or where residences are intermixed with wildlands.

ISSUES OR POTENTIAL IMPACTS NOT DISCUSSED FURTHER

There are no sites on the Cortese List, as established pursuant to Government Code Section 65962.5, within the boundaries of the project site. Therefore, the potential for a significant hazard to the public or the environment due to location of the project on such a hazardous materials site is not evaluated further.

There are no airports in close proximity to the project site. There are two private helistop facilities within Roseville at the Sutter and Kaiser hospitals (located approximately 2 miles and 1 mile north of the project site, respectively). Potential impacts related to airports or the helistop facilities are not discussed further.

IMPACT ANALYSIS

Impact 4.7-1	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
Applicable Policies and Regulations	RCRA, EPCRA, OSHA and Cal/OSHA standards, Hazardous Materials Response Plans and Inventory Law, CFC, RMHMP, RFD Hazardous Materials Response Plan and Standards, City of Roseville Stormwater Quality permitting requirements
Significance with Policies and Regulations	Proposed Project: Less than significant Alignment Option 1A: Less than significant Alignment Option 1C: Less than significant Alignment Option 5A: Less than significant
Mitigation Measures	None required (Proposed Project, Option 1A, Option 1C, Option 5A)
Significance after Mitigation	Less than significant (Proposed Project, Option 1A, Option 1C, Option 5A)

Proposed Trail Alignment

Construction Impacts

The proposed project would involve construction activities such as site preparation, grading, and paving. These activities require the storage, use, and transport of potentially hazardous materials such as fuels, oils, paints, and adhesives. Construction workers, nearby persons or residents, and the surrounding environment could be exposed to hazards associated with accidental releases of the materials, whether through improper handling, unsound disposal methods, transportation accidents, or fires, explosions, or other emergencies.

Contractors would be required to comply with applicable federal, state, and local regulations for handling hazardous material. The requirements include reporting accidental release of hazardous materials. The City's established hazardous material emergency response plan and general emergency response plan would also reduce the potential for harm from accidental release by facilitating timely response to the release of potentially hazardous materials. The RFD is available to respond to hazardous materials complaints or emergencies, if any, during construction.

The City would implement the following plans and special provisions as part of the proposed project to avoid a significant hazard to the public or environment during construction:

- Comply with the RMHMP, which requires contractors to transport and store materials in appropriate and approved containers along designated truck routes, maintain required clearances, and handle materials using fire department.
- Implement a spill prevention and control plan to minimize the exposure of people and the environment to potentially hazardous materials. The spill prevention and control plan would ensure transport, storage, and handling of hazardous materials required for construction is consistent with relevant regulations and guidelines.
- ▲ Comply with the City of Roseville Design and Construction Standards and the West Placer Storm Water Quality Design Manual (Placer County et al. 2016).

Compliance with these plans would be achieved through the following project commitments:

- All heavy equipment would be stored in the designated staging areas and checked by the City inspector and maintained daily to prevent leaks of materials that if introduced to water could be deleterious to aquatic life.
- A Raw cement/concrete (or washings thereof), asphalt, paint or other coating material, oil or other petroleum products, or any other substances associated with project-related activities that could be

- hazardous to aquatic life would be prevented from contaminating the soil or entering creek channels.
- No materials would be placed in the creek channels, except as shown on the project plans. All debris and waste would be picked up daily and properly disposed of at an appropriate site. All construction debris and associated materials would be removed from the work site upon completion of the project.

Use-related Impacts

Hazardous materials would continue to be used and transported in varying amounts during long-term use of the proposed trail project. For example, weed control chemicals and asphalt for patching/crack sealing may be used by City employees or contractors during path maintenance. All maintenance materials required for project use (e.g., oils, grease, lubricants, antifreeze, and similar materials) would be stored off-site.

The project would continue to comply with applicable federal, state, and local regulations, including the City's Multi-Hazard Mitigation Plan. The City's established hazardous material emergency response plan and general emergency response plan would continue to apply to project use, and RFD would be available to respond to hazardous materials complaints or emergencies.

Conclusion

Because the proposed project would be required to implement and comply with existing hazardous material regulations, impacts related to the creation of significant hazards to the public or environment through the routine transport, use, and disposal of hazardous materials would be unlikely. Implementation and compliance with the uniformly applicable plans, standards, and special provisions described above would maintain any potential impacts during construction or trail use at a **less-than-significant** level.

Alignment Option 1A

Both construction and use-related activities under Option 1A would be the same type and general magnitude as would occur under the Proposed Trail Alignment. Because the proposed project would be required to implement and comply with existing hazardous material regulations, impacts related to the creation of significant hazards to the public or environment through the routine transport, use, and disposal of hazardous materials would be unlikely. The impact would be **less than significant** for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 1C

Both construction and use-related activities under Option 1C would be the same type and general magnitude as would occur under the Proposed Trail Alignment. Implementation of this alignment option would not substantially change the potential for creation of significant hazards to the public or environment through the routine transport, use, and disposal of hazardous materials because the proposed project would be required to implement and comply with existing hazardous material regulations. The impact would be **less than significant** for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 5A

Both construction and use-related activities under Option 5A would be the same type and general magnitude as would occur under the Proposed Trail Alignment. Implementation of this alignment option would not substantially change the potential for creation of significant hazards to the public or environment through the routine transport, use, and disposal of hazardous materials because the proposed project would be required to implement and comply with existing hazardous material regulations. The impact would be **less than significant** for the same reasons discussed above for the Proposed Trail Alignment.

Mitigation Measures

None required.

Impact 4.7-2	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release or hazardous materials into the environment.
Applicable Policies and Regulations	EPCRA, OSHA and Cal/OSHA standards, California UST regulations, Caltrans' Standard Specifications, the Unified Program, CFC, RMHMP, RFD Hazardous Materials Response Plan and Standards
Significance with Policies and Regulations	Proposed Project: Less than significant Alignment Option 1A: Less than significant Alignment Option 1C: Less than significant Alignment Option 5A: Less than significant
Mitigation Measures	None required (Proposed Project, Option 1A, Option 1C, Option 5A)
Significance after Mitigation	Less than significant (Proposed Project, Option 1A, Option 1C, Option 5A)

Proposed Trail Alignment

Most of the proposed trail alignment is located within greenbelts along Dry, Cirby, and Linda Creeks that are undeveloped open space. The site reconnaissance and records review conducted in the Initial Site Assessment and Limited Site Assessment did not find documentation or physical evidence of soil or groundwater impairment associated with current or past uses of the project site or contaminated facilities that would reasonably be expected to impact the project site (ENGEO 2015; Crawford & Associates 2016). Based on this, there is a low risk of encountering soil or groundwater affected by materials release in these areas during construction of the proposed project. Although soil and groundwater sampling in the portion of the project site that extends through an industrial area along Riverside Avenue between Darling Way and Kenroy Lane did not identify any existing contamination, the potential to encounter unanticipated hazards is greater in this area (Crawford & Associates Inc. 2016). In addition, although none were detected in surveys, there is also a potential that underground heating oil tanks, wells, and septic systems remain on the property. If discovered, any remaining USTs, wells, and septic systems would need to be properly abandoned in accordance with City permit requirements.

Properties of potential concern include:

- ▲ 645 Riverside Avenue, which is in a commercial/industrial area and has had buildings constructed on the property since before 1947;
- 649 Riverside Avenue, which is in an industrial area and was developed with structures from at least 1947 to 1971; and
- 110 Darling Way, which is in an industrial area and was occupied prior to 1952, and is adjacent to a LUST case where soil vapor extraction and air sparge¹ remediation was performed.

There is also an ongoing investigation of PCE in shallow soil gas near the intersection of Darling Way and Riverside Avenue. PCE is not expected to have affected the project site, however; based on the direction of groundwater flow, the project site is upgradient of this contamination.

The disturbance of undocumented and unexpected hazardous wastes could also result in hazards to the environment and human health. Adverse impacts could result if construction activities inadvertently disperse contaminated material into the environment. Potential hazards to human health include ignition of flammable liquids or vapors, inhalation of toxic vapors in confined spaces such as trenches, and skin

Air sparging is a subsurface contaminant remediation technique that involves the injection of pressurized air into contaminated groundwater, which changes the hydrocarbons from a dissolved to vapor state. The air is then sent to a vacuum extraction system to remove the contaminants.

contact with contaminated soil or water. In addition, inadvertent disturbance of asbestos in underground utilities could result in airborne asbestos fibers. Caltrans' Standard Specifications, Section 14-11 addresses discovery of hazardous materials and contamination during the course of construction work. It states that when the presence of asbestos or hazardous substances are not shown on the plans or indicated in the specifications and a construction contractor encounters materials that the Contractor reasonably believes to be asbestos or a hazardous substance as defined in Section 25914.1 of the Health and Safety Code, and the asbestos or hazardous substance has not been rendered harmless, the contractor may continue work in unaffected areas reasonably believed to be safe. The contractor would immediately cease work in the affected area and report the condition to the project engineer in writing. Following the standard specifications, the contractor would sample the affected area to determine if the material is hazardous and would develop a Sampling and Analysis Plan (SAP) to outline how to analyze, abate, manifest, transport, and dispose of all special and hazardous material as required by law. The SAP would be submitted to the City and would describe how the contractor intends to complete the work plan. The work plan would include the general order of work, a site-specific worker health and safety plan, and a SAP for testing of potentially hazardous materials. It would also include a list of disposal sites the contractor expects to use for the various type of waste and recyclables.

Conclusion

Incorporation of standard best management practices and avoidance measures into the project, as discussed above under Impact 4.7-1, and coordination with regulatory agencies would reduce the potential for negative effects that could result from construction on known contaminated sites. Compliance with standard construction specifications, including Caltrans' Standard Specifications, Section 14-11, would reduce the potential for negative effects that could result from undocumented contamination that has not been characterized or remediated. Therefore, this would be a **less-than-significant** impact.

Alignment Option 1A

Option 1A would result in construction proximate to the same properties of potential concern identified above for the Proposed Trail Alignment. The potential for trail construction to affect these properties would be the same as discussed for the Proposed Trail Alignment, except that Alignment Option 1A may require more activity in the southwest corner of the access and staging area on Riverside Avenue, which is the site of the former facilities at 649 Riverside Avenue. Option 1A would also reduce the area of temporary impacts by 0.40 acre, which would result in a proportional reduction in the potential to encounter undocumented contamination that has not been characterized or remediated. Based on these overall similarities and the existing regulations for known and unknown contamination, the impact associated with implementing Option 1A would be **less than significant** for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 1C

Option 1C would shift trail construction at the westernmost end of the project site from the west side of Dry Creek to the east side. This would separate earthwork that could encounter hazardous materials from the industrial and commercial properties along Riverside Avenue more than the Proposed Trail Alignment. Option 1C would also reduce the area of temporary impacts by approximately 0.57 acre, which would result in a proportional reduction in the potential to encounter undocumented contamination that has not been characterized or remediated. However, Alignment Option 1C would still include construction of the proposed trailhead and parking area on the west side of Dry Creek adjacent to the industrial and commercial properties on Riverside Avenue. Based on these overall similarities and the existing regulations for known and unknown contamination, the impact associated with implementing Option 1C would be **less than significant** for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 5A

Option 5A would not alter the potential for trail construction to affect properties of potential concern in the portion of the project site that extends through an industrial area along Riverside Avenue between Darling Way and Kenroy Lane, However, the alignment would increase the area of temporary impacts by 0.13 acre, which would result in a proportional increase in the potential to encounter undocumented contamination that has not been characterized or remediated. Based on these overall similarities and the existing regulations for known and unknown contamination, the impact associated with implementing Option 5A would be **less than significant** for the same reasons discussed above for the Proposed Trail Alignment.

Mitigation Measures

None required.

Impact 4.7-3	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile if an existing or proposed school.
Applicable Policies and Regulations	RCRA, EPCRA, OSHA and Cal/OSHA Standards, Unified Program, California Highway Patrol and Caltrans hazardous materials transport regulations, RMHMP, RFD Hazardous Materials Response Plan and Standards
Significance with Policies and Regulations	Proposed Project: Less than significant Alignment Option 1A: Less than significant Alignment Option 1C: Less than significant Alignment Option 5A: Less than significant
Mitigation Measures	None required (Proposed Project, Option 1A, Option 1C, Option 5A)
Significance after Mitigation	Less than significant (Proposed Project, Option 1A, Option 1C, Option 5A)

Proposed Trail Alignment

Schools are considered a particularly sensitive receptor relative to hazardous material exposure because there is a concentration of children that is repeatedly exposed to environmental conditions at the school site for extended periods of time. As discussed above, there are three school sites within 0.25 mile of the project site, including a combination preschool and elementary school site, a middle school, and a private school. Also, as described in the environmental setting, no soil contamination was identified during the Initial Site Assessment. Furthermore, as described above under Impact 4.7-1, no significant emissions of hazardous materials would be anticipated during construction or use of the proposed project. And, because of the linear nature of the project, construction activities requiring the use of hazardous materials would occur for a limited duration in the general vicinity of each of the school sites.

During construction, demolition, and excavation activities, the project would potentially produce hazardous air emissions or involve the handling of hazardous wastes. As discussed above, the project would comply with federal and state regulations that are designed to reduce the potential for the release of large quantities of hazardous materials and wastes into the environment to an acceptable level. Existing protective measures and regulations would be sufficient to ensure that hazardous materials stored, used, transported, and disposed of as part of the proposed project would not pose a significant hazard to the public or the environment, including children at schools, under normal conditions.

Conclusion

Due to the limited quantities of potentially hazardous materials required for construction of the project and the applicability of federal, state, and local regulations that would reduce the potential for hazards associated with the transport, use, and storage of hazardous materials, the project would have a **less-than-significant** impact.

Alignment Option 1A

Implementing Alignment Option 1A would not change the proximity of construction activities to the identified school sites. Both construction and use-related activities for Option 1A would be the same type and general magnitude of activities as would occur under the Proposed Trail Alignment. The impact would be **less than significant** for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 1C

Implementing Alignment Option 1C would not change the proximity of construction activities to the identified school sites. Both construction and use-related activities for Option 1C would be the same type and general magnitude of activities as would occur under the Proposed Trail Alignment. The impact would be **less than significant** for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 5A

Implementing Alignment Option 5A would not change the proximity of construction activities to the identified school sites. Both construction and use-related activities for Option 5A would be the same type and general magnitude of activities as would occur under the Proposed Trail Alignment. The impact would be **less than significant** for the same reasons discussed above for the Proposed Trail Alignment.

Mitigation Measures

None required.

Impact 4.7-4	Impair implementation of, or physically interfere with, an adopted emergency evacuation plan or emergency response plan.
Applicable Policies and Regulations	City of Roseville Emergency Operations Plan, City of Roseville Design and Construction Standards, Hazard Mitigation Plan
Significance with Policies and Regulations	Proposed Project: Less than significant Alignment Option 1A: Less than significant Alignment Option 1C: Less than significant Alignment Option 5A: Less than significant
Mitigation Measures	None required (Proposed Project, Option 1A, Option 1C, Option 5A)
Significance after Mitigation	Less than significant (Proposed Project, Option 1A, Option 1C, Option 5A)

Proposed Trail Alignment

Construction Impacts

Trail construction may involve the closure of traffic lanes where trails intersect with streets. The City of Roseville's Design and Construction Standards require that roadwork requiring traffic lane closure be accepted by the City of Roseville Public Works Department. Per the Design and Construction Standards, the project's contractor will implement traffic control measures in accordance with local, state and federal requirements. The construction documents would require the contractor to develop a traffic control plan to provide safe passage to vehicles and pedestrians through the work zone where traffic is allowed. These regulations further require that the police and fire departments, ambulance services, schools, and bus systems receive 48 hours of notice in advance of road closures.

Use-related Impacts

After completion, the proposed multi-use trail would improve access to the Dry Creek, Cirby Creek, and Linda Creek open space areas. Per the Design and Construction standards, the desired vertical clearance at undercrossings would be 12 feet to allow for passage of fire vehicle access. In constrained

areas or where fire vehicle access is not needed, the minimum vertical clearance at undercrossings would be 9 feet.

Conclusion

Construction of the trail could require temporary lane closures in limited locations where the trail would cross underneath a road, which may affect traffic and emergency access. Compliance with the Design and Construction Standards that require noticing of emergency services prior to road closures would permit emergency services adequate time to identify alternate routes and avoid impedance of access through locations of potential congestion. During use, enhanced access may benefit fire and police response to emergencies in these areas. This impact would be **less than significant**.

Alignment Option 1A

Construction and use-related activities associated with implementation of Option 1A would be of the same type and general magnitude as would occur with the Proposed Trail Alignment. This option would have a **less-than-significant** impact on emergency evacuation or response plans for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 1C

Construction and use-related activities associated with implementation of Option 1C would be of the same type and general magnitude as would occur with the Proposed Trail Alignment. This option would have a **less-than-significant** impact on emergency evacuation or response plans for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 5A

Construction and use-related activities associated with implementation of Option 5A would be of the same type and general magnitude as would occur with the Proposed Trail Alignment. This option would have a **less-than-significant** impact on emergency evacuation or response plans for the same reasons discussed above for the Proposed Trail Alignment.

Mitigation Measures

None required.

Impact 4.7-5	Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are located adjacent to urbanized areas or where residences are intermixed with wildlands during project construction.
Applicable Policies and Regulations	CFC, RMHMP, City of Roseville's Design and Construction Standards
Significance with Policies and Regulations	Proposed Project: Potentially significant Alignment Option 1A: Potentially significant Alignment Option 1C: Potentially significant Alignment Option 5A: Potentially significant
Mitigation Measures	Mitigation Measure 4.7-5 (Proposed Project, Option 1A, Option 1C, Option 5A)
Significance after Mitigation	Less than significant (Proposed Project, Option 1A, Option 1C, Option 5A)

Proposed Trail Alignment

Potential losses from wildfire include human life, structures, and other improvements, and natural resources. There are no recorded incidents of loss of life from wildfires in Roseville, and the risk from wildfire has been deemed moderate by both the State and the RFD. Given the immediate response times to reported fires, the likelihood of injuries and casualties is generally low in the project area (City of Roseville 2005).

The Dry Creek Greenway East Trail would be constructed through open space areas where there is a risk of wildfire ignition. The risk is greatest in the dry summer months when drought conditions and dying trees and vegetation create fire-prone conditions. Trail construction has the potential to increase the risk of wildfires by introducing construction vehicles and equipment, such as power tools and torches, that may create sparks and ignite dry vegetation.

Conclusion

Construction activities would have a **potentially significant** impact related to exposure of people or structures to wildland fire because construction activities could ignite the dry grasses on, and adjacent to, the project site.

Alignment Option 1A

Construction activities associated with implementation of Option 1A would be of the same type and general magnitude as would occur with the Proposed Trail Alignment. This option would have a **potentially significant** impact related to exposure of people or structures to wildland fire during project construction for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 1C

Construction activities associated with implementation of Option 1C would be of the same type and general magnitude as would occur with the Proposed Trail Alignment. This option would have a **potentially significant** impact related to exposure of people or structures to wildland fire during project construction for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 5A

Construction activities associated with implementation of Option 5A would be of the same type and general magnitude as would occur with the Proposed Trail Alignment. This option would have a **potentially significant** impact related to exposure of people or structures to wildland fire during project construction for the same reasons discussed above for the Proposed Trail Alignment.

Mitigation Measures

Mitigation Measure 4.7-5: Clear flammable materials within the project site prior to construction.

This mitigation would apply for the Proposed Trail Alignment, Alignment Options 1A, 1C, and 5A.

If dry vegetation or other fire fuels exist on or near staging areas, welding areas, or any other area on which equipment will be operated, contractors shall clear the immediate area of fire fuel prior to construction. To the extent feasible, areas subject to construction activities will be maintained free of fire fuel and debris during the course of construction. To avoid impacts to natural resources, areas to be cleared and appropriate clearing methods shall be identified with the assistance of a qualified biologist.

Significance after Mitigation

Implementation of this mitigation measure would reduce significant construction-related impacts associated with the potential for loss, injury, or death due to wildfire to a **less-than-significant** level by removing fire fuels from construction sites and substantially decreasing the potential for construction activities to ignite a wildfire.

Impact 4.7-6	Use-related exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are located adjacent to urbanized areas or where residences are intermixed with wildlands.
Applicable Policies and Regulations	CFC, RMHMP, City of Roseville's Design and Construction Standards
Significance with Policies and Regulations	Proposed Project: Less than significant Alignment Option 1A: Less than significant Alignment Option 1C: Less than significant Alignment Option 5A: Less than significant
Mitigation Measures	None required (Proposed Project, Option 1A, Option 1C, Option 5A)
Significance after Mitigation	Less than significant (Proposed Project, Option 1A, Option 1C, Option 5A)

Proposed Trail Alignment

Potential losses from wildfire include human life, structures, and other improvements, and natural resources. There are no recorded incidents of loss of life from wildfires in Roseville, and the risk from wildfire has been deemed moderate by both the State and the RFD. Given the immediate response times to reported fires, the likelihood of injuries and casualties is generally low in the project area (City of Roseville 2005).

The introduction of persons into open space, including maintenance workers and bike path users, has the potential to increase the risk of fire (City of Roseville 2008). However, much of the project site is already public land and can be accessed on segments of existing trails or unrestricted access points along and at the ends of public streets. The proposed trail would be designed to meet RFD's guidelines for trail construction to the extent feasible (see Impact 4.7-4, above); therefore, it would provide improved access to emergency responders compared to current conditions. The guidelines facilitate RFD's access to open space and enhance its ability to respond to wildfires. In addition, the City of Roseville has adopted several policies that are intended to reduce the risk of wildfires within open space and to reduce the potential for harm to people or structures resulting from wildfires. These include the City's Multi-Hazard Mitigation Plan, which identifies risk reduction measures for wildfires, including clearing potential fuels, implementing best management practices on public lands, and using goat grazing in City open space and preserve areas. RFD also actively promotes the creation of fire breaks between open space areas and adjoining developed properties. Active control of weeds adjacent to bike trails in all open space areas is conducted by the Parks & Recreation Department and Public Works Department, reducing the potential for accidental fires started by trail users or maintenance worker vehicles.

Conclusion

City of Roseville measures and policies, including RFD and the City's Multi-Hazard Mitigation Plan, would limit exposure to wildland fires from use of the trail, so trail use would not expose people or structures to significant hazards related to wildland fires (City of Roseville 2008). This impact would be less than significant.

Alignment Option 1A

Use-related activities associated with implementation of Option 1A would be of the same type and general magnitude as would occur with the Proposed Trail Alignment. This option would have a **less-than-significant** impact for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 1C

Construction and use-related activities associated with implementation of Option 1C would be of the same type and general magnitude as would occur with the Proposed Trail Alignment. This option would have a **less-than-significant** impact for the same reasons discussed above for the Proposed Trail Alignment.

Alignment Option 5A

Construction and use-related activities associated with implementation of Option 5A would be of the same type and general magnitude as would occur with the Proposed Trail Alignment. This option would have a **less-than-significant** impact for the same reasons discussed above for the Proposed Trail Alignment.

Mitigation Measures

None required.

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