

4.7

HAZARDS AND HAZARDOUS MATERIALS

4.7.1 INTRODUCTION

The Hazards and Hazardous Materials chapter of the Draft EIR addresses existing and potentially occurring hazards and hazardous materials within the proposed project area. This chapter discusses potential impacts posed by these hazards to the environment, as well as to workers, visitors, and residents within and adjacent to the project area. The Hazards and Hazardous Materials chapter is primarily based on information drawn from *Phase I Environmental Site Assessment* (Phase I ESA) (see Appendix H)¹ and the *Limited Phase II Soil Investigation Report* (Limited Phase II) (see Appendix I)² prepared for the proposed project by Leighton and Associates, Inc. Information from the following sources was also used: the *2030 Galt General Plan Policy Document*³ and associated EIR,⁴ the *2030 Galt General Plan Existing Conditions Report*,⁵ and the *2030 Sacramento County General Plan*.⁶ Chapter 4.3, Air Quality and Greenhouse Gas Emissions, of this EIR addresses naturally occurring asbestos (NOA) and concludes that the project site is not in an area likely to contain NOA.

4.7.2 EXISTING ENVIRONMENTAL SETTING

The term hazardous substance refers to both hazardous materials and hazardous wastes. A material is defined as hazardous if the material appears on a list of hazardous materials prepared by a federal, State, or local regulatory agency or if the material has characteristics defined as hazardous by such an agency.

The California Environmental Protection Agency (CalEPA), Department of Toxic Substances Control (DTSC) defines hazardous waste, as found in the California Health and Safety Code, Section 25141(b), as follows:

[...] its quantity, concentration, or physical, chemical, or infectious characteristics: (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; (2) pose a substantial present or potential hazard to human health or the environment, due to factors including, but not limited to, carcinogenicity, acute toxicity, chronic toxicity, bioaccumulative properties, or persistence in the environment, when improperly treated, stored, transported, or disposed of, or otherwise managed.

Leighton and Associates, Inc. performed a Phase I ESA for the project site, and the analysis included site reconnaissance on September 14, 2012 to identify any recognized environmental hazard conditions. A summary of the findings of the Phase I ESA are provided below to describe existing conditions for the site.

Non-Participating Properties

The non-participating properties within the proposed project site have already been established as rural residential development and contain structures and buildings. The existing buildings and structures within the non-participating properties may date back to as early as 1907. A Phase I ESA has not been performed at the non-participating properties to determine the presence (or lack thereof) of any recognized environmental conditions (RECs). However, the non-participating properties would retain the currently adopted General Plan land use designations, and a development plan for the non-participating properties does not currently exist. Because new development on the non-participating properties is not proposed as part of the project, any potential RECs associated with the non-participating properties would not likely affect the Liberty Ranch portion of the proposed project.

Future Growth Area

A Phase I ESA has been performed at the “Future Growth Area” to determine the presence (or lack thereof) of any RECs. The Union Pacific Railroad (UPRR) tracks, trending northeast to southwest, bound the southern area of the “Future Growth Area.” The “Future Growth Area” is covered by non-native grassland and contains a dry pond and irrigation channels south of the UPRR tracks. According to the Phase I ESA, evidence of waste disposal, unusual odors, and underground storage tanks, were not observed on the “Future Growth Area.”

Liberty Ranch

The following provides a description of the existing conditions related to potential hazards or hazardous materials associated with the Liberty Ranch portion of the proposed project.

Archival Research

A review of a previous environmental assessment, historical aerial photographs, building and zoning records, fire insurance maps, and USGS topographic quadrangle maps was performed as part of the Phase I ESA in order to assess the history of the subject site. Results of the review are described in further detail below.

Previous Environmental Assessment

A previous environmental assessment of the project site, entitled *Phase I Environmental Real Estate Assessment* and *Phase II Soil Investigation Report* and dated 2004, was prepared by Shaw Environmental Inc. Shaw’s assessments analyzed existing environmental conditions, reported sightings of hazardous materials, conducted soil samples, and reported observations about the samples collected.

Aerial Photograph Interpretation / Historical Information on the Property

Historical aerial photographs were reviewed to assess the history of the subject site. According to the 1937 aerial photograph, the project site appears to be agricultural land with two east-west

trending meandering streams and partially constructed canals crossing the site. A meandering intermittent stream is present in the central portion of the site. A railroad is depicted on the southern area of the subject site as well as clusters of structures located on the north, east, and west areas of the project site. Depicted in the 1971 aerial photograph, the site appears to have been divided into sections by dirt roads and the previously stated intermittent stream. Illustrated in the 1981 aerial photograph, structural development occurred on site. The intermittent stream in the southern portion of the subject site is no longer visible. According to the 2002 and 2007 aerial photographs, residential housing development on the project site increased during this period including new residential housing located on the west side of the project area. A summary of the historical land use conditions at the site is provided in Table 4.7-1.

Table 4.7-1 Summary of Historical Land Use		
Time Period	Land Usage	Reference
1910 - 1937	Residential structure on eastern portion of project site	Topographic maps
1937 - 1968	Agricultural land and structures on eastern portion of project site	Aerial photographs and topographic maps
1968 - present	Agricultural land and structures located on the eastern and southern portion of project site.	Aerial photographs, topographic maps, and site reconnaissance.
<i>Source: Leighton and Associates Inc., Phase I Environmental Assessment, September, 2012.</i>		

Site Reconnaissance

The project site is relatively flat ranging from 55 to 65 feet above sea level and generally slopes to the southwest. Two irrigation canals, located in the central and southern portions, exist on the project site that trend east-west. A pond is located in the central portion of the subject site and is fed via the irrigation canal.

Soil Contamination

According the Phase II Soil Investigation Report conducted by Shaw Environmental Inc. in the Phase I ESA, organochlorine pesticides (OCPs) were not detected above laboratory reporting limits in samples collected on the project site; however, Shaw collected shallow soil samples across the site to assess potential contaminants of concern that may result from the project site's previous historic agricultural operations and found elevated concentrations (12 mg/kg.) of arsenic. Arsenic was detected near the barn located in the southwest corner of the 13000 Cherokee Lane structure where signage indicated pesticides were stored; however, arsenic was not detected in the other 8 composite soil samples collected on site.

In addition, thirty-seven corroded and punctured 55-gallon steel drums, without caps, were also observed on the project site. The 55-gallon drums were scattered in a field southwest of the 12904 Cherokee Lane property. Most of the drum labels were faded and the contents were not distinguishable; however, a few of the drums were labeled "Compound A Isocyanate." Evidence of stained soils or stressed vegetation was not observed surrounding the drums.

Furthermore, a corroded 55-gallon steel drum was observed beneath a storage silo attached to the largest structure at the 13000 Cherokee Lane property; however, evidence of leakage or staining was not observed in the area.

Although banned in 1979 by the United States Environmental Protection Agency, Polychlorinated Biphenyls (PCBs) continue to have the potential to occur where aged and leaking transformers exist. Nine sets of single pole-mounted transformers were observed at the project site, and were connected to irrigation pumps and the abandoned homes; however, no visual evidence of staining beneath the transformers or at the base of the utility poles was noted. Thus, PCB contamination was not observed on the project site.

Furthermore, during the site reconnaissance of the project site, a structure located west of the 13000 Cherokee Lane property was discovered that contained a wooden door with a warning sign for pesticides; however, no pesticide containers or staining was observed inside. Full 1-gallon containers of flooring adhesive and interior paint were observed inside the garage of the 13000 Cherokee Lane property.

Structures

The project site currently consists of agricultural land with two abandoned houses and associated structures. One abandoned house is located on the eastern portion of the project site at 12904 Cherokee Lane, which includes five storage structures on the property. The second abandoned house is located on the southeastern portion of the project site at 13000 Cherokee Lane and encompasses three separate structures to the west of the residence.

One additional structure is located south of the 12904 Cherokee Lane property. Canals, unpaved levee roads, and ponds exist across the site. Sampling for asbestos and lead-based paint did not occur during observation of the structures existing on the project site. Because the existing structures were built dating back to the mid-1970s, asbestos and lead-based paint has the potential to occur on the existing structures.⁷

Wells and Septic Tanks

Evidence of pits, lagoons, wastewater, sumps, and cisterns were not observed on the project site. However, groundwater wells and a septic tank exist on the project site. The exact number of wells that are currently present on-site are not known. Stained soil surrounding an on-site irrigation pump was observed. The stained soil measured to be three feet in diameter surrounding the concrete supports for the irrigation pump.

General Debris

The southwestern portion of the site contains a pile of material including timber planks, tires, empty 5-gallon buckets, cardboard, and carpet. Miscellaneous piles of debris scatter across the project site encompassing tree branches, thirty-seven 55-gallon steel drums (as discussed previously in the Chapter), tires, broken concrete, plywood, wooden fence posts, chemical containers, three sealed 5-gallon buckets, and scattered household items. In addition,

the abandoned house located at 12904 Cherokee Lane contains debris piles comprising of wood, soil, plastic containers, furniture, trash, and clothing adjacent to an abandoned trailer and minivan.

Underground Structures

During observation of the project site, an unlabeled compressed gas tank was observed southwest of the 13000 Cherokee Lane; however, staining or stressed vegetation underneath or surrounding the tank did not exist. Stressed vegetation was not found during any observations of the project site. In addition, evidence of waste disposal, unusual odors, and underground storage tanks, were not observed.

Conclusion of Previous Environmental Assessments Phase I ESA

As mentioned above, a previous Phase I and Phase II ESA of the project site was prepared by Shaw Environmental Inc. During Shaw's site visit conducted on September 29 and October 13, 2004, soil samples were collected and the laboratory analytical results indicated elevated concentrations of arsenic were detected near the barn located in the southwest corner of the building compound where signage indicated pesticides were stored. Shaw recommended further arsenic sampling in the area around the barns. However, all other chemicals were below United States Environmental Protection Agency (EPA) Region 9 Preliminary Remediation Goals (PRGs) at the time of the 2004 Phase I ESA. In addition, RECs, which are defined as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property", were not identified during the site visit. Furthermore, Shaw concluded the off-site locations would not have an impact on the project site. The previous Phase I ESA also concluded that based on the dates of construction inferred from historic photos of buildings observed at the subject site, asbestos and lead-based paint may be present in some on-site buildings, and an asbestos report and lead-based paint sampling was recommended to be obtained prior to demolition.

4.7.3 REGULATORY CONTEXT

Many agencies regulate hazardous substances. The following discussion contains a summary review of regulatory controls pertaining to hazardous substances, including federal, State, and local laws and ordinances.

Federal Regulations

Federal agencies that regulate hazardous materials include the EPA, the Occupational Safety and Health Administration (OSHA), the Department of Transportation (DOT), and the National Institute of Health (NIH). Prior to August 1992, the principal agency at the federal level regulating the generation, transport and disposal of hazardous waste was the EPA under the authority of the Resource Conservation and Recovery Act (RCRA). As of August 1, 1992, however, the California DTSC was authorized to implement the State's hazardous waste management program for the EPA. The federal EPA continues to regulate hazardous substances

under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). The following federal laws and related regulations govern hazardous materials.

Clean Water Act (33 U.S.C. §1251 et seq. [1972])

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was significantly reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, EPA has implemented pollution control programs such as setting wastewater standards for industry. Discharging any pollutant from a point source into navigable waters is unlawful due to the CWA, unless a permit is obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

Occupational Safety and Health Act (29 U.S.C. §651 et seq. [1970])

Congress passed the Occupational and Safety Health Act to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for the OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states.

Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. §136 et seq. [1996])

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) provides for federal regulation of pesticide distribution, sale, and use. All pesticides distributed or sold in the United States must be registered (licensed) by EPA. Before EPA may register a pesticide under FIFRA, the applicant must show, among other things, that using the pesticide according to specifications "will not generally cause unreasonable adverse effects on the environment." FIFRA defines the term "unreasonable adverse effects on the environment" to mean: "(1) any unreasonable risk to man or the environment, taking into account the economic, social, and environmental costs and benefits of the use of any pesticide, or (2) a human dietary risk from residues that result from a use of a pesticide in or on any food inconsistent with the standard under section 408 of the Federal Food, Drug, and Cosmetic Act."

Comprehensive Environmental Response, Compensation, and Liability Act (42 U.S.C. §9601 et seq. [1980])

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) provides a federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, EPA was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. EPA also recovers costs from financially viable individuals and companies once a response action has been completed. EPA is authorized to implement the Act in all 50 states and U.S. territories.

Superfund Amendments and Reauthorization Act of 1986, Title III; Section 305(a)

The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. In addition, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA). SARA, Title III provides funding for training in emergency planning, preparedness, mitigation, response, and recovery capabilities associated with hazardous chemicals. Title III of SARA addresses concerns about emergency preparedness for hazardous chemicals, and emphasizes helping communities meet their responsibilities in preparing to handle chemical emergencies and increasing public knowledge and access to information on hazardous chemicals present in their communities.

Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq. [1976])

The RCRA gives EPA the authority to control hazardous waste from the "cradle-to-grave," which includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. The federal Hazardous and Solid Waste Amendments (HSWA) - are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.

Safe Drinking Water Act (42 U.S.C. §300f et seq. [1974])

The Safe Drinking Water Act (SDWA) was established to protect the quality of drinking water in the U.S. SDWA focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. The Act authorizes EPA to establish minimum standards to protect tap water and requires all owners or operators of public water systems to

comply with these primary (health-related) standards. The 1996 amendments to SDWA require that EPA consider a detailed risk and cost assessment, and best available peer-reviewed science, when developing these standards. State governments, which can be approved to implement these rules for EPA, also encourage attainment of secondary standards (nuisance-related). Under the Act, EPA also establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids.

Toxic Substances Control Act (15 U.S.C. §2601 et seq. [1976])

The Toxic Substances Control Act (TSCA) of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon and lead-based paint.

U.S. Department of Transportation

Transportation of hazardous materials is regulated by the U.S. Department of Transportation's Office of Hazardous Materials Safety. The office formulates, issues, and revises hazardous materials regulations under the Federal Hazardous Materials Transportation Law. The hazardous materials regulations cover hazardous materials definitions and classifications, hazard communications, shipper and carrier operations, training and security requirements, and packaging and container specifications. The hazardous materials transportation regulations are codified in 49 CFR Parts 100–185.

The hazardous materials transportation regulations require carriers transporting hazardous materials to receive required training in the handling and transportation of hazardous materials. Training requirements include pre-trip safety inspections, use of vehicle controls and equipment including emergency equipment, procedures for safe operation of the transport vehicle, training on the properties of the hazardous material being transported, and loading and unloading procedures. All drivers must possess a commercial driver's license as required by 49 CFR Part 383. Vehicles transporting hazardous materials must be properly placarded. In addition, the carrier is responsible for the safe unloading of hazardous materials at the site, and operators must follow specific procedures during unloading to minimize the potential for an accidental release of hazardous materials.

State Regulations

The CalEPA and the California State Water Resources Control Board establish rules governing the use of hazardous materials and the management of hazardous waste. Within CalEPA, DTSC has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the State agency, for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of the Hazardous Waste Control Law (HWCL). The following discussion contains the applicable State laws.

Public Safety (California Code of Regulations - Title 19)

Title 19 - Public Safety of the California Code of Regulations is known as the Regulations of the State Fire Marshal shall constitute the basic building design and construction standards of the State Fire Marshal. The Regulations of the State Fire Marshal have been prepared and adopted for the purpose of establishing minimum standards for the prevention of fire and for the protection of life and property against fire, explosion and panic.

California Fire Code California Code of Regulations - Title 24, Part 9

The purpose of the California Fire Code is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations.

California Building Code California Code of Regulations - Title 24, Part 2

The purpose of the California Building Code is to establish the minimum requirements to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, stability, access to persons with disabilities, sanitation, adequate lighting and ventilation and energy conservation; safety to life and property from fire and other hazards attributed to the built environment; and to provide safety to fire fighters and emergency responders during emergency operations.

Hazardous Substances Information and Training Act (Labor Code - Section 6360-6363)

The Hazardous Substances Information and Training Act apply to hazardous substances which are present in the workplace as a result of workplace operations in such a manner that employees may be exposed under normal conditions of work or in a reasonably foreseeable emergency resulting from workplace operations. An emergency includes, but is not limited to, equipment failure, rupture of containers, or failure of control equipment, which may or do result in a release of a hazardous substance into the workplace. Hazardous substances in the workplace in some forms and concentrations pose potential acute and chronic health hazards to employees who are exposed to these substances. Employers and employees have a right and a need to know the properties and potential hazards of substances to which they may be exposed, and such knowledge is essential to reducing the incidence and cost of occupational disease.

Cortese List: Government Code Section 65962.5(a)

The DTSC shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all of the following:

1. All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.

2. All land designated as hazardous waste property or border zone property pursuant to former Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code.
3. All information received by the DTSC pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land.
4. All sites listed pursuant to Section 25356 of the Health and Safety Code.

Porter-Cologne Water Quality Control Act (California Water Code, Division 7 [2014])

The Porter–Cologne Water Quality Control Act provides the basis for water quality regulation within California. The act requires a “Report of Waste Discharge” for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. The Central Valley Regional Water Quality Control Board (CVRWQCB) implements waste discharge requirements relevant to the proposed project.

California Vehicle Code Section 31303

The California Highway Patrol (CHP) and California Department of Transportation (Caltrans) are the enforcement agencies for hazardous materials transportation regulations. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations. California Vehicle Code Section 31303 regulates the transport of hazardous materials.

Central Valley Regional Water Quality Control Board

The CalEPA and the Office of Emergency Services (OES) establish regulations governing the use of hazardous materials in California. Within CalEPA, DTSC has primary regulatory responsibility for hazardous waste management. Enforcement of regulations can be delegated to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials under the authority of the Hazardous Waste Control Law. Along with the DTSC, the Regional Water Quality Control Board (RWQCB) is responsible for implementing regulations pertaining to management of soil and groundwater investigation and cleanup. The project site is within the jurisdiction of the Central Valley RWQCB. The RWQCB’s regulations are contained in Title 27 of the CCR. The DTSC, RWQCB, and/or a local agency typically oversees investigation and cleanup of contaminated sites.

California Health and Safety Code

The handling and storage of hazardous materials is regulated on the federal level by the U.S. EPA under CERCLA as amended by the Superfund Amendments and Reauthorization Act (SARA). Under SARA Title III, a nationwide emergency planning and response program was established that imposed reporting requirements for businesses which store, handle, or produce significant quantities of hazardous or acutely toxic substances as defined under federal laws. SARA Title III required each state to implement a comprehensive system to inform federal authorities, local agencies, and the public when a significant quantity of hazardous, acutely toxic substances are stored or handled at a facility.

Ammonia is an example of an acutely hazardous material (AHM) that is regulated by the California Office of Emergency Services under the California Accidental Release Program (CalARP), the U.S. EPA under the Risk Management Program (40 CFR 68), and the OSHA under the Process Safety Management Program (OSHA 1910.119). The California Accidental Release Program and Risk Management Program require that all facilities that store, handle, or use AHMs above a minimum quantity, known as the threshold planning quantity, are required to develop a plan and prepare supporting documentation that summarizes the facility's potential risk to the local community and identifies safety measures to reduce potential risks to the public.

The California Hazardous Waste Control Law (HWCL), Chapter 6.5 of the California Health and Safety Code, is administered by CalEPA to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the EPA approves the California program, both the state and federal laws apply in California. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal and transportation; and identifies some wastes that cannot be disposed of in landfills.

In California, the underground storage of hazardous materials is regulated by Chapter 6.7 of the California Health and Safety Code, per the Underground Storage of Hazardous Substances Act. Under section 25280, the underground tanks used for the storage of substances hazardous to the public health and safety and to the environment are stored prior to use or disposal in thousands of underground locations in the State. The underground tanks used for storage are potential sources of contamination of the ground and underlying aquifers, and may pose other dangers to public health and the environment. Chapter 6.7 establishes orderly procedures that will ensure that newly constructed underground storage tanks meet appropriate standards and that existing tanks be properly maintained, inspected, tested, and upgraded so that the health, property, and resources of the people of the state will be protected.

The handling and storage of hazardous materials is regulated by Chapter 6.95 of the California Health and Safety Code. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a Hazardous Materials Business Plan. The plan provides information to the local emergency response agency regarding the types and quantities of hazardous materials stored at a facility, and provides detailed emergency planning and response procedures in the event of a hazardous materials release. In the event that a facility stores quantities of specific acutely hazardous materials above the thresholds set forth by the California code, facilities are also required to prepare a Risk Management Plan and California Accidental Release Plan, which provides information on the potential impact zone of a worst-case release, and requires plans and programs designed to minimize the probability of a release and mitigate potential impacts.

Local Regulations

The following are the local government's environmental policies relevant to hazards and hazardous materials.

Sacramento County Environmental Management Department

The Sacramento County Environmental Management Department (SCEMD) is the Certified Unified Program Agency for local implementation of CalARP and several other hazardous materials and hazardous waste programs. SCEMD is responsible for regulating hazardous materials business plans and chemical inventory, hazardous materials storage, hazardous materials management plans, and risk management plans. The hazardous materials business plan program requires businesses in Sacramento County to prepare business emergency response plans if hazardous materials storage equals or exceeds 55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of gas. The goal of SCEMD is to protect human health and the environment by ensuring that hazardous materials and hazardous waste are properly managed.

The SCEMD distributes the information in the hazardous materials business plans and business emergency response plans to emergency response agencies, such as the Fire Department/Hazardous Materials Response Teams. In accordance with Health and Safety Code Chapter 6.95, Section 25500, the SCEMD prepared the Area Plan for Emergency Response to Hazardous Materials Incidents in Sacramento County (2012). The plan describes the responsibilities of local, state, and federal agencies during hazardous materials incidents.

City of Galt General Plan

The 2030 City of Galt General Plan goals and policies relating to hazards and hazardous materials that are applicable to the proposed project are presented below:

- Goal SS-5 To minimize the risk of loss of life, injury, serious illness, damage to property, and economic and social dislocations resulting from the use, transport, treatment, and disposal of hazardous materials and hazardous materials wastes.
- Policy SS-5.1 The City shall require that all fuel and chemical storage tanks are sufficiently constructed and include spill containment areas to prevent seismic damage, leakage, fire and explosion, and are structurally or spatially separated from sensitive land uses such as residential neighborhoods, schools, hospitals and places of public assembly.
- Policy SS-5.2 The City shall use land use controls and other City permits to separate hazardous waste facilities from incompatible uses. This includes, but not limited to, schools, daycares, hospitals, public gathering areas, and high-density residential housing.
- Policy SS-5.3 The City shall consider the risks inherent in use, production, storage, and transport of hazardous substances when considering development proposals and their safety features.

Policy SS-5.6	The City shall require, as appropriate and as a component of the environmental review process or business license review/building permit review a hazardous materials inventory for project sites, including an assessment of materials and operations for any development applications.
Policy SS-5.7	The City should continue to provide opportunities for residents to conveniently dispose of household hazardous waste.
Policy SS-5.8	The City shall continue to work with the appropriate waste disposal service provider to educate the public as to the types of household hazardous wastes and the proper methods of disposal.
Policy SS-5.9	The City shall ensure that the proponents of applicable new development projects address hazardous materials concerns through the preparation of Phase I or Phase II hazardous materials studies for each identified site as part of the design phase for each project. Recommendations required to satisfy Federal or State cleanup standards outlined in the studies will be implemented as part of the construction phase for each project.

4.7.4 IMPACTS AND MITIGATION MEASURES

This section describes the standards of significance and methodology utilized to analyze and determine the proposed project's potential impacts related to hazards and hazardous materials.

Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, the City of Galt's General Plan, and professional judgment, a significant impact would occur if the proposed project would result in the following:

- 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 waste within one-quarter 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 it 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 two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area;
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- Expose people or structures to the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Method of Analysis

Site conditions and impacts analyzed in this chapter are based on the Phase I ESA and Limited Phase II prepared for the project site by Leighton and Associates, Inc. As part of the Phase I preparation, site reconnaissance, which included a visual observation of the subject site and surrounding properties, was conducted by Leighton and Associates Inc. on September 14, 2012. The objective of the site reconnaissance is to obtain information indicating the likelihood of identifying RECs, including hazardous substances and petroleum products, in connection with the property.

The Phase I ESA references soil samples and observations from a *Phase I Environmental Real Estate Assessment* and *Phase II Soil Investigation Report* prepared by Shaw Environmental, Inc., dated November 2004. In addition, building department and zoning record information pertaining to the project site was also reviewed as part of the Phase I ESA to inquire about building permits on the project site. Topographic maps and reasonably obtainable historical aerial photos were reviewed to assess historical land uses on and near the site. Aerial photographs dated 1937, 1952, 1968, 1971, 1981, 1993, 2002, and 2007 were reviewed. Historical topographic maps were reviewed to obtain information regarding past site uses. Topographic map coverage of the site vicinity is provided by FirstSearch and included United States Geological Survey (USGS) maps dated 1910, 1942, 1953, 1968, 1975, 1980, and 2012.

In order to further assess the areas of potential concern discovered and documented as RECs in the Phase I ESA, a Limited Phase II was prepared by Leighton and Associated, Inc. in April 2015. As part of the Limited Phase II preparation, soil sampling was conducted by Leighton Associates on April 14 and 16 of 2015 in the three following on-site areas: the barn area; railroad area; and drum storage area. The objective of the soils investigation was to assess the hazardous substances in the RECs identified in the Phase I ESA. The Limited Phase II references soil samples and observations made in the Phase I ESA, as well as the 2004 Shaw Environmental, Inc. Phase I and Phase II.

Project-Specific Impacts and Mitigation Measures

The following discussion of hazards and hazardous materials impacts is based on the implementation of the proposed project in comparison with the standards of significance

identified above. The discussions and mitigation measures presented below apply to the Liberty Ranch, “Future Growth Area,” and non-participating properties portions of the proposed project unless otherwise stated.

4.7-1 Impacts related to transport, use, or disposal of hazardous materials. Based on the analysis below, the impact is *less than significant*.

The potential impacts associated with the transport, use, or disposal of hazardous materials are discussed in further detail below separately for the non-participating properties, “Future Growth Area,” and Liberty Ranch portions of the project site.

Non-Participating Properties

The non-participating properties would retain the currently adopted General Plan land use designations and development of the non-participating properties is not proposed as part of the proposed project. As such, construction activities would not occur on the non-participating properties with implementation of the proposed project. Therefore, impacts related to the transport, use, or disposal of hazardous materials would not occur associated with the non-participating properties.

Future Growth Area

The proposed project does not include development of the “Future Growth Area.” As such, construction activities would not occur on the “Future Growth Area” with implementation of the proposed project. Therefore, impacts related to the transport, use, or disposal of hazardous materials would not occur associated with the “Future Growth Area.”

Liberty Ranch

Projects that involve the routine transport, use, or disposal of hazardous materials typically occur during industrial development. Development of the Liberty Ranch site and the “Future Growth Area” would include the development of approximately 338 acres of land for mixed residential neighborhood uses, including low density and high density residential, parks, open space, and public facilities; therefore, the Liberty Ranch and “Future Growth Area” portions of the proposed project would not involve industrial development. Construction activities would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives; however, the project contractors will be required to comply with all California Health and Safety Codes and local City ordinances regulating the handling, storage, and transportation of hazardous and toxic materials.

Conclusion

As part of the requirements for the NPDES Construction General Permit, all dischargers are required to report any spills to the CVRWQCB. Should an accidental release of

hazardous materials occur during construction, the CCSO Deputy Chief shall be notified and would recommend appropriate remediation measures. Therefore, the impact related to the routine transport, use, or disposal of hazardous materials would be *less than significant*.

Mitigation Measure(s)

None required.

4.7-2 Impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment or emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The potential impacts associated with the release of hazardous materials into the environment within one-quarter mile of an existing or proposed school are discussed in further detail below separately for the non-participating properties and Liberty Ranch portions of the project site.

Non-Participating Properties

Liberty Ranch High School and Estrellita Continuation High School are both located on the non-participating properties. The non-participating properties would retain the currently adopted General Plan land use designations and development of the non-participating properties is not proposed as part of the proposed project. As such, construction activities would not occur on the non-participating properties with implementation of the proposed project. However, because a Phase I ESA has not been prepared for these properties and structures are located on the site, the potential exists for future development to release hazardous materials into the environment. Therefore, without mitigation to ensure the release of hazardous materials into the environment within one-quarter mile of an existing or proposed school does not occur, a potentially significant impact would result.

Future Growth Area

Structures do not exist on the “Future Growth Area;” therefore, lead and asbestos would not be located on the “Future Growth Area.” In addition, unusual odors and stressed vegetation does not exist on the project site. Therefore, based on the Phase I ESA, impacts related to the release of hazardous materials into the environment within one-quarter mile of an existing or proposed school would be less than significant.

Liberty Ranch

The existing Liberty Ranch High School and Estrellita High School are located adjacent to the proposed Liberty Ranch development. In addition, the Liberty Ranch development includes a proposed elementary school. However, development of the Liberty Ranch site

would include the development of mixed residential neighborhood uses, including low density and high density residential, parks, open space, and public facilities. Residential land uses are not typically associated with emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste. In addition, unusual odors and stressed vegetation does not exist on the project site. However, based on the Phase I ESA, soil and structural contaminants have the potential to occur on the project site.

Soil Contamination

The proposed project site is currently and has historically been used for agricultural operations. Agricultural operations generally involve the use of pesticides and/or herbicides, as well as diesel-fueled farming equipment. According to the Phase I ESA, organochlorine pesticides were not detected above laboratory reporting limits in samples collected on the project site; however, concentrations of arsenic were detected near the barn located in the southwest corner of the 13000 Cherokee Lane structure, as well as along the railroad tracks. In addition, thirty-seven (37) existing 55-gallon drums were located on-site west of the abandoned home near Cherokee Avenue. The 55-gallon drums were corroded, punctured, and without caps. Although most of the drums were faded, a few of the drums were labeled “Compound A Isocyanate.” Because building structures on the project site were built dating back to the mid- 1970s, lead and asbestos has the potential to impact the soil around the existing structures. In addition, leaking 5-gallon buckets and irrigation pumps was observed throughout the project site.

In order to further assess the potential hazards associated with the conditions at the barn, railroad tracks, and on-site drums, soil sampling and testing was conducted. The results of the soil sampling were compiled in the Limited Phase II. According to the Limited Phase II, the soil sampling indicated that the arsenic and total petroleum hydrocarbons (TPH) levels at the site are within acceptable ranges of concentration and are not expected to adversely affect human health or the environment. Based on the results of the Limited Phase II, further action related to the conditions at the barn, railroad tracks, and on-site drums would not be required.

Structures

The project site currently hosts two houses and associated structures. One abandoned house is located on the eastern portion of the project site and encompasses five structures on the property. The second abandoned structure is located in the southeastern portion of the project site and incorporates three separate structures to the west of the residence as well as one additional structure located to the south. The existing structures on the project site were built dating back to the mid- 1970s; therefore, lead and asbestos have the potential to exist inside the existing structures. Sampling for asbestos and lead-based paint would be required prior to the demolition of the structures existing on the project site.

Standing Water

Deadman Gulch traverses the middle of the Liberty Ranch site and the area surrounding the Gulch would be designated as open space as part of the proposed project. Deadman Gulch is designed to be both an environmentally sensitive solution to the project's stormwater management needs as well as an aesthetically appealing open space corridor that would serve as a focal point for the project that contributes to the community's identity and character. Storm detention will be constructed alongside Deadman Gulch to mitigate peak 100-year flows into the channel. As noted above, Deadman Gulch could provide suitable mosquito breeding habitat if not properly maintained. Standing water, excessive vegetation, and lack of flow are all conditions which result in favorable mosquito breeding and harborage. However, the project would be conditioned to include a maintenance plan for Deadman Gulch with vector control measures to ensure the aforementioned conditions do not occur.

Conclusion

The Phase I ESA prepared specifically for the Liberty Ranch development identified potential soil contaminants. However, the Limited Phase II found that the contaminant concentrations in the soils at the site, particularly associated with the on-site barn, railroad tracks, and existing drums, are within acceptable ranges of concentration and are not expected to adversely affect human health or the environment. However, the existing structures on-site have the potential to contain asbestos and/or lead-based paint. As such, development of the proposed project could result in the exposure of workers to elevated levels of asbestos and/or lead during grading or other construction activities. Therefore, a hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment associated with asbestos, and lead could occur, and impacts would be considered ***potentially significant***.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

Non-Participating Properties

- 4.7-2(a) *In conjunction with application submittal of development plans for the non-participating properties, a Phase I ESA shall be prepared and submitted for review and approval of the City Engineer.*
- 4.7-2(b) *In conjunction with submittal of any new development application that contains existing structures proposed for demolition, the project applicant shall provide the Community Development Department a detailed assessment pertaining to the potential presence of asbestos or lead-based paint-containing materials in existing on-site structures that may be scheduled for demolition. If structures do not contain lead-based paint or*

asbestos, further mitigation is not required; however, if lead-based paint or asbestos is found, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with federal, State, and local regulations. The demolition contractor shall be informed that all paint on the buildings shall be considered as containing lead and/or asbestos. The contractor shall take appropriate precautions to protect his/her workers, the surrounding community, and to dispose of construction waste containing lead paint in accordance with federal, State, and local regulations subject to approval by the City Engineer.

Liberty Ranch

4.7-2(c) *Prior to the issuance of grading permits and removal of existing structures on the project site, a surficial soil sample laboratory analysis shall be conducted in areas around existing structures on the project site. Once the soils are collected, the soils are to be tested for lead, organochlorine pesticides, and termiticides. If soil contaminants are not found, further action is not required; however, if lead, organochlorine pesticides, or termiticides are found to be higher than the allowable thresholds, the assessment shall include the appropriate mitigation including, but not limited to, soil remediation to an acceptable total threshold limit concentration (TTL) level per applicable State and federal regulations. All recommended mitigation measures shall be implemented by the project applicant, subject to review and approval by the City Engineer.*

4.7-2(d) *Prior to issuance of a demolition permit by the City for any on-site structures, the project applicant shall provide a site assessment that determines whether any structures to be demolished contain lead-based paint or asbestos. If structures do not contain lead-based paint or asbestos, further mitigation is not required; however, if lead-based paint or asbestos is found, all loose and peeling paint shall be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with federal, State, and local regulations. The demolition contractor shall be informed that all paint on the buildings shall be considered as containing lead and/or asbestos. The contractor shall take appropriate precautions to protect his/her workers, the surrounding community, and to dispose of construction waste containing lead paint in accordance with federal, State, and local regulations subject to approval by the City Engineer.*

4.7-3 Impacts related to on-site wells and septic tanks. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The potential impacts associated with to on-site wells and septic tanks are discussed in further detail below separately for the non-participating properties, “Future Growth Area,” and Liberty Ranch portions of the project site.

Non-Participating Properties

The non-participating properties would retain the currently adopted General Plan land use designations and development of the non-participating properties is not proposed as part of the proposed project. As such, construction activities would not occur on the non-participating properties with implementation of the proposed project. Therefore, impacts related to on-site wells and septic tanks would not occur associated with the non-participating properties.

Future Growth Area

The proposed project does not include development of the “Future Growth Area.” As such, construction activities would not occur on the “Future Growth Area” with implementation of the proposed project. In addition, structures or other infrastructure which are typically associated with wells or tanks are not located on the “Future Growth Area.” Therefore, impacts related to on-site wells and septic tanks would not occur associated with the “Future Growth Area.”

Liberty Ranch

Unused groundwater wells that are not properly abandoned could potentially carry bacteria, sediment, fertilizer, pesticides, or other pollutants as a result of runoff flowing into the wells. Contaminated flow into the open wells could potentially contribute to contamination of the groundwater or aquifer. Septic systems have the potential to affect subsurface soils associated with the effluent from the systems and/or any potentially faulted septic tanks. The Liberty Ranch site contains existing wells and septic tanks. Because Liberty Ranch would connect to the City’s wastewater system, the existing on-site wells and septic systems would need to be properly abandoned prior to development of the site to avoid contamination from the wells and septic systems.

Conclusion

Impacts related to wells or septic systems on the non-participating properties or the Future Growth Area would not occur. However, the wells and septic systems on the Liberty Ranch site would require proper abandonment prior to groundbreaking activities. Therefore, impacts related to on-site wells associated with the project site would be *potentially significant*.

Mitigation Measure(s)

Implementation of the following mitigation measure, which requires proper abandonment of a well or septic system on the project site, would ensure that impacts related to well and septic tanks are reduced to a *less-than-significant* level.

4.7-3 *Prior to any ground disturbance activities within 50 feet of a well or septic system on the project site, the applicant shall hire a licensed contractor to obtain an abandonment permit from the Sacramento County Environmental Management Department, and properly abandon the on-site well and/or septic tank, pursuant to review and approval by the City Engineer.*

4.7-4 Impacts related to transformers and debris on the project site. Based on the analysis below, the impact is *less than significant*.

The potential impacts associated with transformers and debris on the project site are discussed in further detail below separately for the non-participating properties, “Future Growth Area,” and Liberty Ranch portions of the project site.

Non-Participating Properties

The non-participating properties would retain the currently adopted General Plan land use designations and development of the non-participating properties is not proposed as part of the proposed project. As such, construction activities would not occur on the non-participating properties with implementation of the proposed project. Therefore, impacts related to transformers and debris on the project site would not occur associated with the non-participating properties.

Future Growth Area

The proposed project does not include development of the “Future Growth Area.” As such, construction activities would not occur on the “Future Growth Area” with implementation of the proposed project. According to the Phase I ESA, pole-mounted transformers or other debris are not located on the “Future Growth Area.” Therefore, impacts related to transformers and debris on the project site would not occur associated with the “Future Growth Area.”

Liberty Ranch

Nine sets of pole-mounted transformers was observed adjacent to irrigation pumps and both abandoned houses. A licensed utility company shall remove the transformers prior to issuance of grading permits. In addition, debris is scattered across the site, as well as an abandoned trailer and minivan located on the 12904 Cherokee Lane property.

Conclusion

Prior to development of the Liberty Ranch site, all debris shall be removed from the project site pursuant to regulatory guidelines. Thus, impacts related to transformers and debris on the project site would have a *less-than-significant* impact.

Mitigation Measure(s)

None required.

4.7-5 Located on a hazardous materials site compiled pursuant to Government Code Section 65962.5. Based on the analysis below, the project would have *no impact*.

According to the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List), the proposed project is not located on a site which is included in the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.⁸ Therefore, the project would not create a significant hazard to the public or the environment, and *no impact* would occur.

Mitigation Measure(s)

None required.

4.7-6 Located within an airport land use plan, within two miles of a public airport, or within the vicinity of a private airstrip. Based on the analysis below, the project would have *no impact*.

The nearest airport to the project site is the Mustang Airport, located approximately 3.5 miles north of the project site. As such, the project site is not located within two miles of any public airports or private airstrips, and does not fall within an airport land use plan area. Therefore, *no impact* would occur.

Mitigation Measure(s)

None required.

4.7-7 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Based on the analysis below, the impact is *less than significant*.

The potential impacts associated with the proposed project impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan are discussed in further detail below separately for the non-participating properties, "Future Growth Area," and Liberty Ranch portions of the project site.

Non-Participating Properties

The non-participating properties would retain the currently adopted General Plan land use designations and development of the non-participating properties is not proposed as part

of the proposed project. As such, construction activities would not occur on the non-participating properties with implementation of the proposed project. Therefore, impacts related to the proposed project impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would not occur associated with the non-participating properties.

Future Growth Area

The proposed project does not include development of the “Future Growth Area.” As such, construction activities would not occur on the “Future Growth Area” with implementation of the proposed project. Therefore, impacts related to the proposed project impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would not occur associated with the “Future Growth Area.”

Liberty Ranch

The City of Galt does not have an adopted emergency response plan. However, the City of Galt participates with the City of Elk Grove and offers a Community Emergency Response Team (CERT) training program. The CCSD Fire Department’s CERT program is a tuition-free training program that provides members of the community with the knowledge and skills necessary to be self-sufficient in the event of a major disaster or emergency. In addition, the Liberty Ranch site would not significantly alter the existing street system or major roadways and would provide new connections throughout the project site. The Liberty Ranch development would also comply with all applicable building codes and regulations.

Conclusion

The proposed project would not impair implementation of or physically interfere with the City’s existing CERT training program for Galt residents, and the Liberty Ranch development would not restrict vehicular, pedestrian, or bicycle access within or in the vicinity of the project site. Therefore, the proposed project would not be expected to interfere with emergency response or emergency evacuation, and impacts would be *less than significant*.

Mitigation Measure(s)

None required.

4.7-8 Expose people or structures to wildland fires. Based on the analysis below, the impact is *less than significant*.

As discussed in the Project Description of the Draft EIR, the proposed project is located in an area that is surrounded by agricultural activity, open space, rural residential area to the north and south, agricultural activity and rural residential area to the east, and residential development to the west. Wildland fires are considered to be a low threat to

people and structures in the project area. However, grass fires can occur on uncultivated lands, particularly where there is native vegetation. Given the project site is surrounded by residential area, agricultural property, and cultivated land, wildland fire vulnerability is considered low. Therefore, exposure of people or structures to wildland fire resulting from the development of the project site would have a *less-than-significant* impact.

Mitigation Measure(s)

None required.

Cumulative Impacts and Mitigation Measures

The following discussion of impacts is based on the implementation of the proposed project in combination with other proposed and pending projects in the region. Other proposed and pending projects in the region under the cumulative context would include buildout of the City's General Plan.

4.7-9 Cumulative exposure to potential hazards associated with potentially contaminated soil and groundwater and an increase in the transport, storage, and use of hazardous materials. Based on the analysis below, the cumulative impact is *less than significant*.

Impacts associated with hazardous materials are site-specific and generally do not aggregate as a result of cumulative development. Cumulative development projects would be subject to the same federal, State, and local hazardous materials management requirements as would the proposed project, which would minimize potential risks associated with increased hazardous materials use in the community, including potential effects, if any, on the proposed project. Therefore, cumulative impacts associated with hazardous materials transport, storage, and use associated with implementation of past, present, and reasonably foreseeable future projects, as well as the proposed project would be *less than significant*.

Mitigation Measure(s)

None required.

Endnotes

- ¹ Leighton and Associates Inc. *Phase I Environmental Assessment Southwest Corner of Twin Cities Road and Cherokee Avenue, Galt Unincorporated Area of Sacramento County, California*. September 14, 2012.
- ² Leighton and Associates Inc. *Phase II Soil Investigation Report Liberty Ranch Southwest Corner of Twin Cities Road and Cherokee Avenue, Galt Unincorporated Area of Sacramento County, California*. April 28, 2015.
- ³ City of Galt. *2030 Galt General Plan Policy Document*. April 2009.
- ⁴ City of Galt. *Final Environmental Impact Report for the 2030 Galt General Plan*. March 2009.
- ⁵ City of Galt. *2030 Galt General Plan Exiting Conditions Report*. November 2005.
- ⁶ Sacramento County. *2030 General Plan*. November 2011.

⁷ Shaw Environmental. *Phase I Environmental Real Estate Assessment and Phase II Soil Investigation Report, Agricultural Property, Twin Cities Road, Marengo Road, Cherokee Lane [pg. 7-1]*. November 2004.

⁸ <http://www.calepa.ca.gov/sitecleanup/CorteseList/SectionA.htm>. Accessed February 4, 2015.