Section 4.7

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4.7 HAZARDOUS AND HAZARDOUS MATERIALS

This section describes existing conditions and the potential hazards and hazardous materials impacts associated with the construction and operation of the Proposed Project and alternatives.

4.7.1 Applicable Laws, Regulations, and Standards

4.7.1.1 The Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III and Clean Air Act of 1990

SARA established a nationwide emergency planning and response program and imposed reporting requirements for businesses that store, handle, or produce significant quantities of extremely hazardous materials. The act (codified in 40 CFR, § 68.110 et seq.) requires states to implement a comprehensive system to inform local agencies and the public when a significant quantity of such materials is stored or handled at a facility. Additionally, SARA identifies requirements for planning, reporting, and notification concerning hazardous materials.

4.7.1.2 Clean Water Act (CWA)

The SPCC plan was developed as one of the many requirements of the CWA. Requirements of SPCCs are provided in Title 40, CFR, Part 112. SPCCs are intended to reduce the threat of spills of hydrocarbons to navigable waters of the United States.

4.7.1.3 Tanner Bill (AB 2948 [Chapter 1504, Statures of 1986])

The Tanner Bill authorizes counties to prepare Hazardous Waste Management Plans (HWMP) to manage hazardous materials and waste products. In 1990, the Riverside County HWMP was adopted by the Board of Supervisors and approved by the California Department of Health Services. The Riverside County HWMP identifies generated wastes and establishes programs for managing these wastes in Riverside County (City of Palm Desert General Plan 2004).

4.7.1.4 The Uniform Fire Code (UFC), Article 80

This article deals with hazardous materials issues of the UFC. The article provides local fire departments with the responsibility for enforcement requirements of the development of HWMP and submittal of a Hazardous Material Inventory Statement. Normally the plan and inventory are combined into a single document. The City of Palm Springs has adopted the UFC Article 80.

4.7.2 Significance Criteria

Impacts to hazards and hazardous materials are considered potentially significant if the project:

- Creates a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous waste
- Creates a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment

- Emits hazardous emissions or handles hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile of an existing or proposed school
- Is located on a site that is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or the environment
- For a project located within an airport land use plan or, where a plan has not been adopted, within 2 miles of a public airport or public-use airport, results in a safety hazard for people residing or working in the project area
- For a project within the vicinity of a private air strip, results in a safety hazard for people residing or working in the project area
- Impairs implementation of or physically interferes with an adopted emergency response plan or emergency evacuation plan
- Exposes people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands

4.7.3 Applicant Proposed Measures

SCE proposes the following APMs with respect to hazards and hazardous materials considerations:

HAZ-1. Hazardous Materials and Waste Handling Management. Hazardous materials used and stored onsite for the proposed construction activities - as well as hazardous wastes generated onsite as a result of the proposed construction activities - would be managed according to the specifications outlined below.

- Hazardous Materials and Hazardous Waste Handling: A project-specific hazardous materials management and hazardous waste management program would be developed prior to construction of the project. The program would outline proper hazardous materials use, storage, and disposal requirements, as well as hazardous waste management procedures. The program would identify types of hazardous materials to be used during the project and the types of wastes that would be generated. All project personnel would be provided with project-specific training. This program would be developed to ensure that all hazardous materials and wastes are handled in a safe and environmentally sound manner. Hazardous wastes would be handled and disposed of according to applicable rules and regulations. Employees handling wastes would receive hazardous materials training and shall be trained in hazardous waste procedures, spill contingencies, waste minimization procedures and Treatment, Storage, and Disposal Facility (TSDF) training in accordance with OSHA Hazard Communication Standard and 22 CCR. SCE would use landfill facilities that are authorized to accept treated wood pole waste in accordance with HSC 25143.1.4(b).
- Construction Stormwater Pollution Prevention Plan (SWPPP): A project-specific construction SWPPP would be prepared and implemented prior to the start of construction of the Proposed Project. The SWPPP would utilize BMPs to address the storage and handling of hazardous materials and sediment runoff during construction activities.

- Transport of Hazardous Materials: Hazardous materials that would be transported by truck include fuel (diesel fuel and gasoline) and oil and lubricants for equipment. Containers used to stored hazardous materials would be properly labeled and kept in good condition. Written procedures for the transport of hazardous materials used would be established in accordance with U.S. Department of Transportation and Caltrans regulations. A qualified transporter would be selected to comply with U.S. Department of Transportation and Caltrans regulations.
- Fueling and Maintenance of Construction Equipment: Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Vehicles and equipment would be refueled onsite or by tanker trucks. Procedures would include the use of drop cloths made of plastic, drip pans, and trays, to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pads and trays would be available. The fuel tanks also would contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials, such as paints, solvents, and penetrants, would be kept in an approved locker or storage cabinet.
- Emergency Release Response Procedures: An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. It would prescribe hazardous materials handling procedures for reducing the potential for a spill during construction and would include an emergency response program to ensure quick and safe cleanup of accidental spills. All hazardous materials spills or threatened release, including petroleum products such as gasoline, diesel, and hydraulic fluid, regardless of the quantity spilled, would be immediately reported if the spill has entered a navigable water, stream, lake, wetland, or storm drain, if the spill impacted any sensitive area including conservation areas and wildlife preserved, or if the spill caused injury to a person or threatens injury to public health. All construction personnel, including environmental monitors, would be aware of state and federal emergency response reporting guidelines.

HAZ-2. Fire Management Plan. The Fire Management Plan would be developed by SCE prior to start of construction.

HAZ-3. Spill Prevention, Counter Measure, and Control Plan (SPCC). In accordance with Title 40 of the CFR, Part 112, SCE would prepare an updated SPCC for appropriate substations within the Proposed Project. The plans would include engineered and operational methods for preventing, containing, and controlling potential releases, and provisions for quick and safe cleanup.

HAZ-4. Hazardous Materials Business Plan (HMBPs). SCE would prepare and submit an updated HMBP for appropriate substations within the Proposed Project. The required documentation would be submitted to the Certified Unified Program Agency (CUPA). The HMBPs would include hazardous materials and hazardous waste management procedures and emergency response procedures, including emergency spill cleanup supplies and equipment.

4.7.4 Existing Conditions

4.7.4.1 Wildfires

Wildfires are a potential hazard in the project area; however, the Western Coachella Valley Area Plan (2006), within the County of Riverside General Plan, indicates that the project area lies within wildfire zones classified as "low" and "very low."

4.7.4.2 Hazardous Substances

SCE conducted a Preliminary Environmental Site Assessment, which included a review of the Environmental FirstSearch records database, to determine if there were any records of waste sites in the proximity of the Proposed Project, including the proposed 220 kV transmission line loop-in, proposed and alternative 115 kV subtransmission line routes, subtransmission line reconfiguration sites, and substations associated with the project. In addition, the EnviroStor and GeoTracker databases also were reviewed via the Department of Toxic Substance Control (DTSC) website to determine if there were any hazardous materials or substances in the vicinity of the Proposed Project.

A search of the oil well database via the California Department of Oil, Gas, and Geothermal Resources' website indicated that there are no oil wells within a 1-mile radius of the proposed 220 kV transmission line loop-in and the proposed and alternative 115 kV subtransmission line routes.

The results of the Environmental FirstSearch records review prepared in May 2007 for the Proposed Project components are as follows:

4.7.4.3 Transmission

The database records review identified one non-geocoded2 Underground Storage Tank (UST) site in the vicinity of the Proposed Devers-Coachella Valley 220 kV Loop-In. The non-geocoded status indicates that an adequate address is not available, and, therefore, the exact location of the site cannot be identified. However, based upon interpretation of topographic quadrangles and use of Google Earth to approximate the distance from the Proposed Project by the provided zip code, it was determined that the UST is not a neighboring facility along the proposed 220 kV transmission line loop-in. No Leaking Underground Storage Tanks (LUSTs) were identified within a 1-mile radius of the proposed 220 kV transmission line loop-in. Therefore, there are no known hazardous materials or substances in the vicinity of the Proposed Devers-Coachella Valley 220 kV Loop-In.

² Non-geocoded properties are properties identified on federal and state listings by city and zip code, but the exact location for these properties relative to the sites are unknown. Addresses of non-geocoded properties are reviewed in the environmental database. Where non-geocoded properties were identified within a distance or direction of the sites considered noteworthy, the non-geocoded property was reassigned a correct distance and direction.

4.7.4.4 Subtransmission

Proposed Farrell-Garnet 115 kV Subtransmission Line (Route 1)

The records review identified 18 sites on this route. Eight sites are orphan (those contaminated by a release of hazardous substances that pose serious threats to human health or the environment, where the parties responsible for the contamination are either unknown or unable or unwilling to pay for needed remedial actions) or non-geocoded sites, meaning that they do not have adequate addresses and, therefore, the exact location of the sites cannot be identified. Seven of the orphan sites were obtained from the Emergency Response Notification System (ERNS) database. Based on the available database-search information, topographic quadrangle interpretations, and use of Google Earth to approximate the distance from the route by the provided zip codes, it was determined that they are not located on the proposed route. The eighth non-geocoded site is a Solid Waste Landfill (SWL) site, located approximately 2 miles from the proposed subtransmission line route.

Of the 10 geo-coded sites, that is, sites with sufficient address information, four contain LUSTs. Three of the four are located near the Proposed Farrell-Garnet 115 kV Subtransmission Line (Route 1). However, according to the SWRCB these sites have a "Case Closed" status; therefore, no further analyses are required. In addition to the LUST locations, there are two USTs in the vicinity of the proposed route that do not have any leaking records. Three Resource Conservation and Recovery Act (RCRA) generator sites were identified near the route; however, limited information was provided for these three sites. The tenth geo-coded site is from the ERNS database and is not located on the route, therefore, no further analysis is required.

Proposed Mirage-Santa Rosa 115 kV Subtransmission Line (Route 4)

The records review identified eight sites on this route. Six of the eight sites are from the ERNS database and have neither adequate addresses for mapping, nor details available regarding the spill material. Nevertheless, based on the provided database-search information, interpretation of topographic quadrangles, and use of Google Earth to approximate the distance from the route by the provided zip codes, it was determined that these sites are not located on Alternative Route 4 and would not cause significant impacts on the subject route. Of the two remaining sites, one is a proposed school site located on the corner of Gerald Ford Drive and Portola Avenue. The EnviroStor database on the DTSC website shows that the site has a "No Action Required" status as of April 19, 2004. The last identified site in the FirstSearch Linear search is the Cabazon Solid Waste Landfill site.

4.7.4.5 Subtransmission Line Reconfigurations

Intersection of Bob Hope Drive and Dinah Shore Drive

The records review identified two geocoded sites for this intersection. One record, from the LUST database, indicated that the site has gasoline leakage that affected soil only. The site has a "Case Closed" status according to the DTSC website; therefore, no further analysis is required. No information was available for the second site from the Riverside County Environmental Health Department's database. Based upon the provided geo-coded location, the site was determined not to be within proximity of the Proposed Project.

Intersection of Varner Road and Date Palm Drive

The records review identified three non-geocoded sites for this intersection and two geocoded sites. All three non-geocoded sites were from the ERNS database and were determined not to be located within the proximity of the intersection by using Google Earth and the provided zip code to approximate the distance from the intersection.

The two geocoded sites were located near the intersection. One was from the ERNS database, with no additional information provided. Due to the provided geocoded location, the site was determined to not be within the proximity of the Proposed Project. The other site was from the LUST database, and, according to the GeoTracker website, as of October 10, 2003, the site has a "Case Closed" status; therefore, no further analysis is required.

Two additional LUST sites in the area were identified in the GeoTracker database but both had a "Case Closed" status; therefore, no further analysis is required.

Intersection of Gerald Ford Drive and Portola Avenue

The records review identified three geocoded sites for this area. All three sites are located on Gerald Ford Drive, and two of the sites are proposed school sites. According to the records, DTSC has reviewed Phase I ESA reports and gave a "No Action" status for the two school sites; therefore, no further analysis is required. The third site was listed in the RCRA Generator database as ignitable waste (e.g., gasoline). Due to the geocoded location, the site is not in the proximity of the Proposed Project.

4.7.4.6 Substations

Existing substations associated with the Proposed Project store and use a variety of hazardous materials, including mineral oil, lubricating oil, batteries, cleaning chemicals, and gases. The substations also generate small quantities of hazardous waste, including waste oil and lubricants. Existing substations have developed and implemented SPCC Plans and HMBPs to manage the use of hazardous materials and prevent releases of such materials into the environment.

The proposed substation areas for construction, expansion, and/or modification are not known to contain subsurface hazardous waste in areas to be graded or excavated.

Devers Substation

The records review identified one geocoded site, which is the subject property itself. Devers Substation is listed as containing hazardous waste, such as benzene and tetrachloroethylene. However, there was no record of violation at the property; therefore, no further analysis is required.

Eisenhower Substation

The records review identified eight geocoded sites within the vicinity of this substation. One of the sites, Palm Springs Disposal Services, is an active SWL site. The Palm Springs Disposal Services site is located adjacent to, and northwest of, the Eisenhower Substation. The site has

two USTs and a leakage history, although the case is closed. Since the case is closed, no further analysis is required. Of the remaining seven sites, two were from the LUST database, one was from the UST database, one was from the RCRA generator database, two were from the Riverside County Environmental Health department, and one was from the SWL database. Based on the available records, the two LUST sites affected soil only. The tanks have been removed from the UST site. No information was provided for the RCRA generator or the Riverside County sites. The SWL site was listed as closed. Due to the provided geocoded locations, the sites were determined not to be in the proximity of the Proposed Project.

Farrell Substation

The records review identified three geocoded sites and one non-geocoded site for this area. The geocoded sites were from the UST and LUST databases. The geocoded LUST sites are located more than 0.5 mile away from the site and they all have a "Case Closed" status. Since the cases are closed, no further analyses are required.

The non-geocoded UST site is located within a 0.5-mile radius of the property; however, no additional information on the site was provided. Due to the distance, the site is not in the proximity of the Proposed Project.

Garnet Substation

The records review identified three non-geocoded sites for this area. Two sites were from the ERNS database. Based on the available records, interpretation of topographic quadrangles, and use of Google Earth to approximate the distance from the route by the provided zip code, it was determined that the two spills did not occur on the subject property. The third site was from the SWL database and is located north of I-10, in Desert Hot Springs, and not on the subject property or within its vicinity, so no further analysis is required.

Thornhill Substation

The records review identified two geocoded sites and one non-geocoded site within the vicinity of this substation. The geocoded sites were from the RCRA generator and Riverside County Environmental Health Department databases and did not occur within the proximity of the substation. The non-geocoded site was from the UST database; however, the GeoTracker Web site did not show any UST on or nearby the subject property, so no further analysis is required.

4.7.4.7 Airports

The Palm Springs International Airport is located approximately 0.5 mile south of Farrell Substation and west of Gene Autry Trail, within the Farrell-Garnet Project Area. The airport is managed by staff from the City of Palm Springs. Fourteen airlines operate out of Palm Springs International Airport, with a peak of 53 daily departures.

4.7.5 Impact Analysis

4.7.5.1 Construction Impacts

Wildfires

Typical construction activities have the potential to create sparks from mechanical equipment operation, welding, gasoline and diesel engine operation, and electrical equipment operation. Construction-related fire hazards could cause fires. With implementation of APM HAZ-2, risks related to fire caused by construction of the Proposed Project would be minimal, however, and would be less than significant.

Hazardous Substances

The majority of the findings of the Preliminary Environmental Site Assessment were ERNS, RCRA generator, and LUST sites from nearby businesses, such as gas stations and automative repair shops. Based on the search findings, SCE believes that there is no significant environmental concern that would prevent the use of the proposed transmission and subtransmission line routes.

Hazardous materials to be used during the construction of the Proposed Project include gasoline, diesel fuel, oil, and lubricants. There are no feasible alternatives to these materials for the operation of construction vehicles and equipment, and BMPs would be implemented during construction to reduce the potential for or exposure to accidental spills or fires involving the use of hazardous materials. No acutely hazardous materials (AHMs) would be used or stored on-site during construction.

Due to the low volume and low toxicity of the hazardous materials, the potential for environmental impacts from hazardous material incidents during construction is less than significant. The most likely incidents involving these hazardous materials are associated with minor spills or drips. Impacts from such incidents would be avoided by thoroughly cleaning up minor spills as soon as they occur. Site-specific construction SWPPP BMPs would be followed in order to ensure a quick response to minor spills and minimal impacts to the environment.

As required by OSHA, construction personnel handling hazardous materials would be trained to understand the hazards associated with these materials and would be instructed in the proper methods for storing, handling, and using these hazardous materials. The on-site construction foreman would ensure that all on-site health and safety guidelines and regulations involving hazardous materials handling are followed during the construction phase of the Proposed Project.

In the event that contaminated soil is encountered during excavation activities for the Proposed Project, the soil would be segregated, sampled, and tested to determine appropriate disposal/treatment options. If the soil is classified as hazardous (according to RCRA) the soil would be properly profiled, manifested, and transported to a Class I landfill or other appropriate soil treatment or recycling facility.

Construction staging areas would be located over 250 feet from any existing schools. Therefore, the Proposed Project would not expose local schools to hazardous substances.

In summary, with implementation of APMs HAZ-1, HAZ-3, and HAZ-4, impacts resulting from hazardous substances would be less than significant.

Transmission and Subtransmission Tower and Pole Removal

The towers and poles that would be removed as part of the transmission and subtransmission line work would be either returned to the manufacturer, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a RWQCB-approved municipal landfill. The poles would be completely removed, including the portion below the ground surface, and the holes would be backfilled with imported fill in combination with any available fill material available from the installation of the steel poles. After the transmission and subtransmission lines are transferred to the new poles, any remaining line conductor that cannot be used by SCE would be delivered to a certified recycling facility (APMs HAZ-1 and HAZ-4).

Emergency Response

Emergency response time is defined as the speed at which fire, police, and ambulance services effectively react to an emergency or emergency call. Currently, the Proposed Project would not interfere with any streets, or airports; therefore, it would not interfere with an adopted emergency response plan. However, during construction, there may be times when one lane of traffic in a particular portion of the Proposed Project would have to be closed. This might interfere with emergency response times for emergency service providers. If one lane of traffic would have to be closed, then SCE would inform the transportation department of the local jurisdiction for its input and approval in order to minimize the potential impact on emergency response services.

If required, SCE would obtain an encroachment permit or similar authorization from the applicable agency with jurisdiction at locations where the construction activities would occur within or above the public road ROW. The applicable permit would be obtained prior to conducting work within or above a ROW. The specific requirements of the applicable transportation agency might require traffic safety measures at encroachment/crossing locations, including detouring all traffic off the roadway at the construction location or implementation of a controlled continuous traffic break while stringing operations are performed. The applicable permits might also restrict road closures to off-peak periods, to avoid excessive traffic congestion, where necessary. The specific agency requirements would be included as stipulations in the required permits. Compliance with the permit conditions (such as those measures described above) would ensure that potential impacts associated with short-term lane closures would be less than significant (see Section 4.15.2: Applicant Proposed Measures for Traffic and Transportation).

In summary, project construction impacts related to hazards and hazardous materials would be less than significant.

4.7.5.2 Operational Impacts

Operation of the Proposed Project would not require the routine transport, use, or disposal of hazardous materials. The project area is not included on a list of hazardous materials sites, nor would operation of the associated substations impact operation of an airport or private airstrip. The associated substations would not impair implementation of or physically interfere with an

adopted emergency response plan or evacuation plan nor would they expose people or structures to wildland fires. Operation of the proposed 220 kV transmission line loop-in and 115 kV subtransmission lines would not create additional hazards. With implementation of appropriate APMs, operation impacts would be less than significant.

Wildfires

The impact of potential fire hazards would be less than significant.

Hazardous Substances

Operation of the Proposed Project would not require the routine transport, use, or disposal of hazardous materials.

The proposed transformer banks contain mineral oil, which could leak or spill if the transformers were to be damaged from a seismic event, fire or other unforeseen incident. To minimize potential impacts, the design of the substations provides containment and/or diversionary structures or equipment to prevent discharge of an oil spill as described in the SPCC requirements (40 CFR Part 112.1 through Part 112.7). An SPCC Plan would be updated by SCE after completion of the project and any oil-containing equipment is brought to the substation site.

Emergency Response

Operation and maintenance of the Proposed Project would not block roads or impede emergency access in the area. Maintenance would be conducted in accordance with traffic requirements of the local jurisdiction. Therefore, the operation and maintenance of the Proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. The impact on emergency response services would be less than significant.

Airports

Portions of the Proposed Project components are located within 0.5 mile of the Palm Springs International Airport. SCE would comply with the Riverside County Airport Land Use Compatibility Plan (2004). This is discussed further in section 4.9, Land Use and Planning. The Proposed Project would not result in a safety hazard to people working or residing in the area, and the impacts would be less than significant.

Schools

The California State Board of Education requires that schools be sited more than 100 feet from the edge of the ROW of 100-110 kV lines; 150 feet from 220-230 kV lines; and 250 feet from 345 kV lines. Because all existing schools located within the Project Areas are located more than 250 feet away from the project components, there is a less than significant impact to local schools.

In summary, impacts to hazards and hazardous materials due to operation of the Proposed Project would be less than significant.

4.7.6 <u>Alternatives</u>

4.7.6.1 Existing Conditions

Farrell-Garnet 115 kV Subtransmission Line Alternative Route 2

The records review identified 14 geocoded sites and seven non-geocoded site in the vicinity of this alternative route. Six of the seven non-geocoded sites were obtained from the ERNS database and, based upon interpretation of topographic quadrangles and use of Google Earth to approximate the distance from the route by the provided zip code, it was determined that they are not located on the subject route. The seventh location is a SWL site (same site noted under Alternative Route 1) and is located approximately 2 miles from the route. Five LUST sites near the route all have "Case Closed" status. Four nearby sites contain USTs but the sites do not have leaking history. There are a total of three RCRA generator sites near the route; however, the database search indicates that none of the sites are within the vicinity of the Proposed Project. One local site, Alberson #6569, was listed; however, no additional information was provided from the search. The final site, the Desert Aids Project, was identified as a state Voluntary Clean Up site.

Farrell-Garnet 115 kV Subtransmission Line Alternative Route 3

The records review identified 34 sites in the vicinity of this route. Twelve sites are from the ERNS database and are non-geocoded. However, the partial addresses of seven of the sites indicate that the locations are within Palm Springs International Airport. Six identified LUST sites near the subject route have a "Case Closed" status. In addition to the LUST sites, nine sites contain USTs. The Desert Aids Project, a state Voluntary Clean Up site, is near the subject route. The remaining 12 sites are from the Riverside County database or the RCRA generator site list. A review of these sites revealed that they would not be affected by the subject route.

Mirage-Santa Rosa 115 kV Subtransmission Line Alternative Route 5

The records review identified 10 sites in the vicinity of this route. One site was obtained from the ERNS database and is not located on the subject route. There are five LUST locations, two of which are located near the route. However, both sites have a "Case Closed" status. A search of the EnviroStor database, on the DTSC website, indicated that these sites would not have a significant environmental impact to the subject route. The four remaining sites include a school site, a UST site, a RCRA generator site, and a local site. The proposed school site, University High School, has a "No Action Required" status as of April 19, 2004. The UST site, Arco Facility, does not a have leakage history. The record for the RCRA generator site, Home Depot, indicates that the facility has ignitable and corrosive waste. The local site, Pete Automotive, is located approximately 0.1 mile southwest of the subject route; however, there is no additional information provided for the site. Based on the records review, the four sites not previously discussed would not be affected by the subject route.

4.7.6.2 Impacts

Construction Impacts

The alternatives would use similar hazardous materials as those used during construction of the Proposed Project. Construction of the alternatives would not create additional hazards. Due to the low volume and low toxicity of the hazardous materials, and with the implementation of appropriate APMs, the potential for environmental impacts from hazardous material incidents during construction would be less than significant.

Operational Impacts

The alternatives would use similar hazardous materials as those used during operation of the Proposed Project. Operation of the alternatives would not create additional hazards. Due to the low volume and low toxicity of the hazardous materials, and with the implementation of appropriate APMs, the potential for environmental impacts from hazardous material incidents during operation would be less than significant.

4.7.7 <u>References</u>

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