

4.7 Hazards and Hazardous Materials

This section presents hazardous materials and hazards conditions in the Inner Harbor Specific Plan Area and evaluates the potential for implementation of the Specific Plan to result in significant impacts related to exposing people or structures to unfavorable geologic hazards, soils, and/or seismic conditions that may affect health and safety. A review of the applicable regulatory framework for the Specific Plan implementation is also provided. Potential impacts are discussed and evaluated, and appropriate mitigation measures are identified where necessary. This section also presents a project-level analysis of the Harbor View project, which is based on a site-specific reports prepared for that project site that include Phase I reports, a risk management plan, and remediation action plans (Iris, 2013; Iris, 2015a; Iris, 2015b; Iris, 2014a; Iris, 2014b; Iris, 2014c).

CEQA requires the analysis of potential adverse effects of a project on the environment. While potential effects of the environment on the project are arguably not required to be analyzed or mitigated under CEQA, this section nevertheless analyzes potential effects of past hazardous materials releases, airport safety and wildfires on the Specific Plan implementation as set forth in CEQA *Guidelines*, Appendix G, Significance Criteria, and in order to provide information to the public and decision-makers. As such, the potential adverse effect of existing hazardous materials sites on proposed project sensitive uses and receptors is analyzed below.

4.7.1 Setting

Definitions

Materials and waste are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability); corrode other materials (corrosivity), or react violently, or explode or generate vapors when mixed with water (reactivity). The term “hazardous material” is defined in the State Health and Safety Code (Chapter 6.95, Section 25501[o]) as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment.

A hazardous waste, for the purpose of this EIR, is any hazardous material that is abandoned, discarded, or recycled, as defined in the State Health and Safety Code (Chapter 6.95, Section 25125). The transportation, use, and disposal of hazardous materials, as well as the potential releases of hazardous materials to the environment, are closely regulated through many state and federal laws.

Potential Receptors/Exposure

The sensitivity of potential receptors in the areas of known or potential hazardous materials contamination is dependent on several factors, the primary factor being the potential pathway for human exposure. Exposure pathways include external exposure, inhalation, and ingestion of contaminated soil, air, water, or food. The magnitude, frequency, and duration of human exposure can cause a variety of health effects, from short term acute symptoms to long-term chronic

effects. Potential health effects from exposure can be evaluated in a health risk assessment. The principle elements of exposure assessments typically include:

- Evaluation of the fate and transport processes for hazardous materials at a given site;
- Identification of potential exposure pathways;
- Identification of potential exposure scenarios;
- Calculation of representative chemical concentrations; and
- Estimation of potential chemical uptake.

Hazardous Building Materials

Demolition, development and redevelopment projects often involve the need to demolish existing older structures. Many older buildings contain building materials that consist of hazardous materials, which can be hazardous to people and the environment once disturbed. These materials include lead-based paint, asbestos-containing materials (ACM), and polychlorinated biphenyls (PCBs).

Lead and Lead-Based Paint

Prior to the U.S. Environmental Protection Agency (EPA) ban in 1978, lead-based paint was commonly used on interior and exterior surfaces of buildings. Through such disturbances as sanding and scraping activities, or renovation work, or gradual wear and tear, old peeling paint, or paint dust particulates have been found to contaminate surface soils or cause lead dust to migrate and affect indoor air quality. Exposure to residual lead can cause severe adverse health effects, especially in children.

Asbestos

Asbestos is a naturally-occurring fibrous material that was extensively used as a fireproofing and insulating agent in building construction materials before such uses were banned by the EPA in the 1970s. ACM were commonly used for insulation of heating ducts as well as ceiling and floor tiles, linoleum, and cement shingles to name a few typical types of materials. Similar to lead-based paint, ACM contained within the building materials present no significant health risk because there is no exposure pathway. However, once these tiny fibers are disturbed, they can become airborne and become a respiratory hazard. The fibers are very small and cannot be seen with the naked eye. Once they are inhaled, they can become lodged into the lung potentially causing lung disease or other pulmonary complications.

State laws and regulations prohibit emissions of asbestos from asbestos-related manufacturing, demolition, or construction activities; require medical examinations and monitoring of employees engaged in activities that could disturb asbestos; specify precautions and safe work practices that must be followed to minimize the potential for release of asbestos fibers; and require notice to federal and local governmental agencies prior to beginning renovation or demolition that could disturb asbestos. The San Francisco Bay Area Air Quality Management District (BAAQMD) is vested by the California legislature with authority to regulate airborne pollutants, including

asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or abatement work. (See *Regulatory Setting*, below, for future regulations regarding asbestos removal.)

Polychlorinated Biphenyls (PCBs)

PCBs are organic oils that were formerly used primarily as insulators in many types of electrical equipment including transformers and capacitors. After PCBs were determined to be a carcinogen in the mid to late 1970s, the U.S. EPA banned PCB use in most new equipment and began a program to phase out certain existing PCB-containing equipment. Fluorescent lighting ballasts manufactured after January 1, 1978, do not contain PCBs and are required to have a label clearly stating that PCBs are not present in the unit.

Mercury

Spent fluorescent light tubes, thermostats, and other electrical equipment contain heavy metals such as mercury that, if disposed of in landfills, can leach into soil or groundwater. Lighting tubes typically contain concentrations of mercury that may exceed regulatory thresholds for hazardous waste and, as such, must be managed in accordance with hazardous waste regulations. Elemental mercury waste is considered hazardous. Mercury can also be present in traps in the plumbing of older buildings in which mercury-containing equipment has been used.

Regional and Local Setting

The Plan Area and vicinity is characterized by a mix of open space, commercial, civic, and light and heavy industrial uses. Predominate landside uses include building-related commercial and industrial uses, outdoor storage, marine and aquatic uses along the waterfront, and public uses that include the County jail, correctional facilities and shelter and a City police station. Surrounding uses include heavier industrial, rail and port uses, commercial office and research and development facilities. Historical uses in and around the Plan Area involved commercial shipping and ship building activities, tanneries, and the City's sewage treatment plant.

Hazardous materials are known to exist at Inner Harbor either as part of existing operations or previous site uses.¹ Currently documented sites at Inner Harbor are located away from the Docktown Marina and are clustered to the south where industrial uses predominate; these were identified along Maple Street at the site of the new County Jail, where a residual risk management plan is being implemented. Businesses may need to store chemicals on-site or may bring materials on-site for production purposes. People currently reside in floating vessels along Redwood Creek within the Plan Area.

TRA Environmental Solutions gathered data on locations within and adjacent to the Inner Harbor for which information is on record to assess whether hazardous materials are present in subsurface materials, and to determine any recent or past actions taken to clean-up hazardous

¹ Site records of contamination are available spanning the years of 1990 to 2012, activities prior to those dates may not have been recorded, and additional ground contamination may be present within the Plan Area.

materials. A limited buffer of one-quarter mile around the Specific Plan Area was chosen based on professional judgment considering the general use of hazardous materials in the project area site and surroundings and the size of the Plan Area. Information was obtained from Envirofacts Reports, Envirostor Reports, Geotracker Reports, San Mateo County Hazard Reports, and Vulnerable Zone Indicator System Reports. The majority of the sites identified by TRA were those locations where materials had been stored on site or below ground and either a leak or spill had occurred. Some cases have been closed by regulatory agencies (meaning that remediation has been completed), while cases at other sites are on-going and being monitored. Contaminants include asphalt, diesel, gasoline, other petroleum, polynuclear aromatic hydrocarbons, and volatile organic compounds.

Phase I Environmental Site Assessments were also completed for the following addresses; 320-350 Blomquist Street, 19 Stein Am Rhein Court, and 19 Seaport Boulevard (Iris, 2013; Iris, 2015a; and Iris, 2015b). The findings of these reports all determined that recognized environmental conditions were present within these addresses that warranted further investigation largely based on historical site uses. Tar-like materials were noted in near surface soils along with asbestos fibers associated with the former presence of the Pabco facility adjacent to the site (east of 320 Blomquist Street). The Pabco facility manufactured linoleum, asbestos insulation, and asbestos cement shingles (Iris, 2013). Later development in areas surrounding the Pabco facility are thought to have received waste materials associated with asbestos producer causing fill materials to contain asbestos fibers. Other recognized environmental conditions include a past release of petroleum hydrocarbons associated with a Union Pacific Railroad spill, the presence of two former underground storage tanks that were left in place at 19 Seaport Boulevard, and truck washing/maintenance activities that occurred at this location (Iris, 2015a, and Iris, 2015b).

The Remediation Action Plans for 320 and 340 Blomquist Street call for the excavation and removal of the chemicals of concern including the tar-like materials, polycyclic aromatic hydrocarbons (PAHs) petroleum hydrocarbons, volatile organic compounds (VOCs), metals, and asbestos (Iris, 2014b and Iris, 2014c). Preliminary estimates call for the removal of approximately 800 to 1,000 cubic yards (cy) at 320 Blomquist and approximately 3,000 cubic yards at 340 Blomquist Street (Iris, 2014b, and 2014c).

In addition, sediment sampling was conducted within sediments of Redwood Creek in the vicinity of the Plan Area (Pacific EcoRisk, 2011), the report for which is provided as **Appendix J** to this EIR. Various metals, organochlorine pesticides, organotins², PAHs and PCBs were detected above San Francisco Bay background levels (SFRWQCB 1998 as cited in Pacific EcoRisk, 2011). The mercury and PCB concentrations in the each of the sediment samples exceeded the SF Bay 99th percentile mercury and PCB concentration of 0.46 milligrams per kilogram (mg/kg) and 26.0 micrograms per kilogram (µg/kg), respectively.

A metal debris fire at SIMS Metal Management in Redwood City adjacent to the Inner Harbor area on November 10, 2013, led to a “shelter in place” call from local authorities. The warning

² Organotin compounds are chemical compounds based on tin with hydrocarbon substituents.

for people to stay inside was extended to parts of San Mateo, Santa Clara and Alameda counties. While such events cannot be predicted, the presence of combustible and hazardous materials in area industrial uses creates a potential health risk related to the accidental release of hazardous materials into the environment (risk of upset).

In addition, a release of diesel from the Union Pacific Railroad (UPRR) occurred on December 2, 2011 (SWRCB, 2015). The UPRR locomotive released an estimated 300 gallons of diesel from a locomotive fuel tank due to a puncture on the bottom of the tank. The locomotive reportedly ran over debris on the track which caused the release. The locomotive was traveling north adjacent to the Seaport Boulevard frontage road and fuel was released along the track and UPRR right-of-way until the train stopped adjacent to the Lyngso Garden Materials business located at 19 Seaport Boulevard. Fuel reportedly pooled on the eastern side of the track and flowed across the weathered asphaltic concrete pavement of Seaport Boulevard and into the unpaved right-of-way on the east side of the road. In addition, soil staining from the release was observed at three additional locations within the UPRR right-of-way between Stein Am Rhein Court and Veterans Boulevard. The investigation and cleanup of the spill is currently under the oversight of the San Mateo County Groundwater Protection Program.

Airport Influence Areas are used in land use planning to identify areas commonly overflowed by aircraft as they approach and depart an airport, or as they fly within established airport traffic patterns. The portion of the Plan Area located west of Maple Street is within the Airport Influence Area of the San Carlos Airport; see further discussion under *Regulatory Setting*, below.

4.7.2 Regulatory Setting

Federal and State

The primary federal agencies with responsibility for hazardous materials management include the U.S. EPA, U.S. Department of Labor Occupational Safety and Health Administration (Fed/OSHA), and the U.S. Department of Transportation (DOT). Federal laws, regulations, and responsible agencies are summarized in **Table 4.7-1**.

State and local agencies often have either parallel or more stringent regulations than federal agencies. In most cases, state law mirrors or overlaps federal law and enforcement of these laws is the responsibility of the state or of a local agency to which enforcement powers are delegated. For these reasons, the requirements of the law and its enforcement are discussed under either the state or local agency section.

**TABLE 4.7-1
 FEDERAL LAWS AND REGULATIONS RELATED TO HAZARDOUS MATERIALS MANAGEMENT**

Classification	Law or Responsible Federal Agency	Description
Hazardous Materials Management	Community Right-to-Know Act of 1986 (also known as Title III of the Superfund Amendments and Reauthorization Act (SARA))	Imposes requirements to ensure that hazardous materials are properly handled, used, stored, and disposed of and to prevent or mitigate injury to human health or the environment in the event that such materials are accidentally released.
Hazardous Waste Handling	Resource Conservation and Recovery Act of 1976 (RCRA)	Under RCRA, the EPA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste from "cradle to grave."
	Hazardous and Solid Waste Act	Amended RCRA in 1984, affirming and extending the "cradle to grave" system of regulating hazardous wastes. The amendments specifically prohibit the use of certain techniques for the disposal of some hazardous wastes.
Hazardous Materials Transportation	U.S. Department of Transportation (DOT)	Has the regulatory responsibility for the safe transportation of hazardous materials. The DOT regulations govern all means of transportation except packages shipped by mail (49 CRF).
	U.S. Postal Service (USPS)	USPS regulations govern the transportation of hazardous materials shipped by mail.
Occupational Safety	Occupational Safety and Health Act of 1970	Fed/OSHA sets standards for safe workplaces and work practices, including the reporting of accidents and occupational injuries (29 Code of Federal Regulations [CFR]).
Structural and Building Components (Lead-based paint, PCBs, and asbestos)	Toxic Substances Control Act (TSCA)	Regulates the use and management of PCBs in electrical equipment, and sets forth detailed safeguards to be followed during the disposal of such items.
	U.S. EPA	The EPA monitors and regulates hazardous materials used structural and building components and effects on human health.

Regional

San Mateo County Environmental Health Division

The San Mateo County Environmental Health Division is responsible for providing a safe and healthful environment in the county's 20 cities and unincorporated areas through education, monitoring and enforcement of a variety of regulatory programs as well as ongoing services to the community. Part of the Division includes the Hazardous Materials Program (HMP) which is the Certified Unified Program Agency (CUPA) for all areas of San Mateo County. The HMP provides comprehensive environmental regulatory compliance inspection services to protect human health and the environment. Additionally, program personnel perform plan reviews and inspections associated with the construction, upgrading, and closure of hazardous materials storage facilities and equipment.

Under authority granted by the state, the county's HMP administers the following programs:

- Hazardous Waste Generator Program (California Health and Safety Code Chapter 6.5)
- Hazardous Waste Tiered Permitting (California Health and Safety Code Chapter 6.5)
- Underground Storage Tanks (California Health and Safety Code Chapter 6.7)
- Aboveground Storage Tanks (California Health and Safety Code Chapter 6.67)
- Hazardous Materials Business Plans (California Health and Safety Code Chapter 6.95)
- California Accidental Release Prevention Program (California Health and Safety Code Chapter 6.95)

State and Regional

San Mateo County Environmental Health Division / Hazardous Materials Management

The Federal Emergency Planning and Community Right-To-Know Act 312 requires businesses have available Material Safety Data Sheets (MSDS) and must submit hazardous chemical inventory forms to the State Emergency Response Commission, Local Emergency Preparedness Committee, and local fire department annually on March 1st. Meeting this federal requirement is achieved through compliance with the California Hazardous Materials Business Plan program (CA Health and Safety Code sec 25504 [a-c]). The Hazardous Materials Business Plans describe hazardous materials inventory, storage container types and locations, emergency response and evacuation procedures, and employee hazardous materials training program. Enforcement of hazardous materials management rules and the Hazardous Materials Business Plan (HMBP) is assigned to the Certified Unified Program Agency (CUPA), the San Mateo County Environmental Health Division.

California Department of Toxic Substances Control / Hazardous Waste Management

The Federal Resource Conservation and Recovery Act of 1976 (RCRA) established a “cradle-to-grave” regulatory program governing the generation, transportation, treatment, storage, and disposal of hazardous waste. Under RCRA, individual states may implement their own hazardous waste programs in lieu of RCRA as long as the state program is at least as stringent as federal RCRA requirements (see Table 4.7-1).

EPA approved California’s RCRA program, called the Hazardous Waste Control Law (HWCL) in 1992. In California, the Environmental Protection Agency (Cal EPA) and the Department of Toxic Substances Control DTSC, a department within Cal EPA, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. The hazardous waste regulations establish criteria for identifying, packaging, and labeling hazardous wastes; dictate the management of hazardous waste; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in landfills. These regulations also require hazardous waste generators to prepare a Hazardous Waste Contingency Plan that describe hazardous waste storage and secondary containment facilities, emergency response and evacuation procedures, and employee hazardous waste training

program. While DTSC generally retains authority, day to day enforcement of hazardous waste management rules is delegated to the CUPA, the San Mateo County Environmental Health Division.

Hazardous Materials Transportation

The State of California has adopted federal DOT regulations for the intrastate movement of hazardous materials. State regulations are contained in Title 26 of the California Code of Regulations (CCR). In addition, the State of California regulates the transportation of hazardous waste originating in the state and passing through the state (26 CCR). Both regulatory programs apply in California. The two state agencies that have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol (CHP) and the California Department of Transportation (Caltrans).

Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) assumes primary responsibility for developing and enforcing workplace safety regulations in California. Because California has a federally approved OSHA program, it is required to adopt regulations that are at least as stringent as those found in Title 29 of the Code of Federal Regulations (CFR) (see *Fed/OSHA*, above). Cal/OSHA standards are generally more stringent than federal regulations.

Cal/OSHA regulations (8 CCR) concerning the use of hazardous materials in the workplace require employee safety training, safety equipment, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. Cal/OSHA enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances, and communicating hazard information relating to hazardous substances and their handling. State laws, like federal laws, include special provisions for hazard communication to employees in research laboratories, including training in chemical work practices. Specific, more detailed training and monitoring is required for the use of carcinogens, ethylene oxide, lead, asbestos, and certain other chemicals listed in 29 CFR.

Emergency Response

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local government and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the State Office of Emergency Services (OES), which coordinates the responses of other agencies, including Cal EPA, CHP, California Department of Fish and Wildlife (CDFW), the San Francisco Bay Regional Water Quality Control Board (RWQCB), San Mateo County Fire Department (SMFD), and the Redwood City Fire Department (RCFD). The RCFD and SMFD provide first response capabilities, if needed, for hazardous materials emergencies within the project area.

Dredging Permitting

Construction activities that include dredging in federally jurisdictional waters would be required to apply for and obtain a CWA Section 404 permit from the Army Corps of Engineers prior to dredging. (See also Section 4.3, *Biological Resources*, for additional discussion of Section 404 permit). As a part of the Section 404 permitting process, the project sponsor would be required to obtain a water quality certification from the RWQCB under Section 401 of the CWA. The project may be required to dredge and dispose material in accordance with the requirements of the RWQCB Basin Plan and Corps. Typically, the dredged material is disposed at ocean or in-bay disposal sites or reused for wetland restoration or dike maintenance depending on sampling results. In the event an in-bay disposal is proposed, the project sponsor would be required to provide an adequate alternatives analysis showing that there are no practicable alternatives to in-bay disposal.

The Dredged Material Management Office (DMMO) regulates dredging and dredged material in the San Francisco Bay region. The DMMO consists of representatives from the USEPA- Region 9, U.S. Army Corps of Engineers-San Francisco, San Francisco Bay RWQCB, BCDC, and the State Lands Commission. The DMMO serves as the single point of entry for applicants to the dredging and disposal permitting process. The DMMO regulates two types of dredging projects; 1) small dredging projects defined by a project depth of less than -12 feet mean lower low water (MLLW) and generating less than 50,000 cubic yards per year on average, and 2) other dredging projects defined by project depth greater than -12 feet MLLW or average annual volumes greater than 50,000 cubic yards (USACE, 2001).

Local Regulations

Redwood City Fire Department and Redwood City Building

The Redwood City Fire Department and Redwood City Community Development Department also have regulatory roles in protecting the public from dangers associated with hazardous materials and wastes. Fire Department permits are required for storing, dispensing, using, or handling hazardous materials in excess of quantities specified in Section 105 of the 2012 International Fire Code/2013 California Fire Code as adopted and amended by the City of Redwood City.

City/County Council of Governments (C/CAG) of San Mateo County and the Federal Aviation Administration (FAA)

The San Carlos Airport is located approximately 1.8 miles west of the Plan Area. The C/CAG of San Mateo County, in its designated role as the Airport Land Use Commission (ALUC) (C/CAG Board) for San Mateo County, has adopted the land use control provisions for airport vicinities identified in Federal Aviation Regulations (FAR) Part 77, *Objects Affecting Navigable Airspace for the San Carlos Airport*, Guidelines for determining if a land use may be an obstruction to air navigation are set forth in FAR Part 77. Any proposed new construction or expansion of existing structures that would penetrate any of the FAR Part 77 would be deemed incompatible unless specifically determined otherwise by the FAA.

The C/CAG Board has also adopted an Airport Influence Area boundary for San Carlos Airport. The boundary consists of two areas: Area A and Area B. Area A extends from the Burlingame/San Mateo border to the San Mateo County/Santa Clara County line, defines a boundary within which disclosure of the proximity of an airport is required, per State law, as part of all real estate sales or leases within the boundary. The Plan Area is located entirely within Area A. Area B, known as the C/CAG/ALUC Referral Boundary, is a geographic area within which affected local agencies must refer their proposed land use policy to the C/CAG Board and ALUC for a determination of the consistency of the proposed land use policy action(s) with the relevant provisions contained in the most recent version of the San Mateo County Comprehensive Airport Land Use Plan (CLUP), as amended for San Carlos Airport. Because the portion of the Plan Area located west of Maple Street is within Area B, the proposed Specific Plan must be referred to the C/CAG Board and the ALUC for review and evaluation prior to City adoption.

Redwood City General Plan

The *Public Safety Element* of the Redwood City General Plan describes the following hazardous materials and hazards policies, adopted for the purpose of avoiding or mitigating an environmental effect, that apply to the Specific Plan and/or the Harbor View project. Policies listed below that are also considered land use policies are addressed in Section 4.9, *Land Use and Planning*, of this Draft EIR.

- Policy PS-8.1: Establish policies to regulate and reduce hazardous waste within Redwood City that are consistent with the County's Hazardous Waste Management Plan and other County regulatory programs.
- Policy PS-8.2: Educate residents and businesses about household hazardous wastes, less toxic materials that can be used in place of toxic materials, and proper household hazardous waste disposal methods.
- Policy PS-8.3: Work to ensure that land previously used as agriculture, commercial, and industrial is safe and contains no environmental hazards.
- Policy PS-8.4: Encourage the use of green building practices to reduce potentially hazardous materials in construction materials.

4.7.3 Project Baseline

Under CEQA, the project baseline is normally defined as the physical conditions of the environment as it exists at the time of publication of the Notice of Preparation of the EIR. Information regarding past releases of hazardous materials was obtained from the environmental review of the Plan Area as reported by TRA Environmental Solutions in February 2014. Therefore, this analysis evaluates the Specific Plan and the development project impacts assuming baseline conditions as largely defined by the findings of the TRA 2014 report.

4.7.4 Significance Criteria

Based on California Environmental Quality Act (CEQA) *Guidelines* Appendix G, a project would cause adverse impacts related to hazards and hazardous materials if it would:

- a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;
- b) 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;
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school;
- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- e) 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 result in a safety hazard for people residing or working in the project area;
- f) For a project within the vicinity of a private airstrip, would result in a safety hazard for people residing or working in the project area;
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Exposure of the public to air emission hazards associated with construction and operation of the Specific Plan implementation is addressed in Section 4.2, *Air Quality*.

Approach to Analysis

Inner Harbor Specific Plan

The analysis of the Specific Plan in this document uses the findings from the 2014 TRA Environmental Solutions report as well as Plan characteristics and the general type of development that might occur with implementation of the plan. Future development is also evaluated on the basis of how the current regulatory framework affects future development that would occur with the plan.

Harbor View Project

The analysis of the development project in this document uses a similar approach to that of the Plan with the obvious difference in the geographic area that would be affected.

Cumulative

Regarding the assessment of cumulative impacts, a project's contribution to cumulative impacts to regional air quality should be considered significant if the project's impact individually would be significant (i.e., exceeds the BAAQMD's quantitative thresholds).

Topics Considered and Determined No Impact

The following topics are considered to have no impact to the Inner Harbor Specific Plan or the Harbor View project because of the project site location. These topics are not discussed any further in this EIR.

- School Emissions (Criteria c). There are no schools located within a quarter mile of the proposed project site. The closest school to the project site is the Summit Charter High School located approximately 0.5 miles southeast. However, proposed land uses would consist primarily of commercial, residential, and open space land uses which are not associated with substantive hazardous emissions. Therefore, the potential for development under the Plan or Harbor View project to affect schools within a quarter mile of the project site is very low and not discussed further.
- Airstrip (Criteria f). The Plan Area is not located within 2 miles of a private airstrip.
- Emergency Plan or Evacuation Plan (Criteria g). The Plan Area is located in a developed urban area with an existing road network. New development in the Plan Area would not permanently interfere with the existing road network or with the ability for emergency response vehicles to access all areas within the Plan Area. Overall, future development would not impede emergency access routes and would continue to maintain the existing city grid systems. Additionally, the project would not result in permanent road closures that would physically interfere with emergency response or evacuation plans. Therefore, development within the Plan Area would not impair or interfere with any emergency response or emergency evacuation plans.
- Wildland Fires (Criteria h). The Plan Area is located in a developed region that is not adjacent to wildlands that would be considered at risk for wildland fires.

4.7.5 Program-Level Impacts of the Inner Harbor Specific Plan

Impact HAZ-1.SP: Construction associated with development under the Specific Plan as well as operational land uses could create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials. (Criterion a) (Potentially Significant)

Contaminated Soils and Groundwater

Future development within the Plan Area could include excavation for installation of utilities, building foundations, subterranean development, or for regrading purposes as well as dredging of sediments within Redwood Creek channel. Disturbance of subsurface soils and groundwater at locations that may have been previously contaminated by prior land uses or unrelated historical flows into the S.F. Bay waters that could affect sediments could further disperse existing contamination into the environment and expose construction workers or the public to

contaminants. As noted above in the Setting section, prior land uses have been associated with unauthorized releases of hazardous materials to the subsurface at the project site and nearby (e.g., UPRR diesel spill). Many of these sites have been closed indicating that no further threat to human health or the environment was found. However, other sites are still in the process of investigation. In addition, a limited sediment sampling analysis of sediments within Redwood Creek was performed and found to contain various metals (including mercury), organochlorine pesticides, organotins, polyaromatic hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs) above San Francisco Bay background levels (Pacific EcoRisk, 2011).

If elevated levels of hazardous materials in excavated soils, in excess of regulatory standards, should go undetected, health and safety risks to workers and the public could occur. Exposure to hazardous materials could cause various short-term and/or long-term health effects. Possible health effects could be acute (immediate, or of short-term severity), chronic (long-term, recurring, or resulting from repeated exposure), or both. Acute effects, often resulting from a single exposure, could result in a range of effects from minor to major, such as nausea, vomiting, headache, dizziness, or burns. Chronic exposure could result in systemic damage or damage to organs, such as the lungs, liver, or kidneys. Health effects would be specific to each hazardous material.

Any dredged sediments would be required to obtain and adhere to various permits, including the Section 404 permit and related 401 certification a dredging permit managed by the DMMO which regulates dredging and dredged material in the San Francisco Bay region. The DMMO consists of representatives from the USEPA- Region 9, U.S. Army Corps of Engineers-San Francisco, San Francisco Bay RWQCB, BCDC, and the State Lands Commission. The DMMO serves as the single point of entry for applicants to the dredging and disposal permitting process to ensure the appropriate characterization, handling and ultimate disposal of dredged sediments such that any threat to human health and the environment is minimized.

Contamination may also be present at some other unidentified locations where unidentified releases have occurred or where releases may have migrated onto the Plan Area (e.g., UPRR diesel spill). It is not uncommon to encounter unexpected conditions once groundbreaking activities commence. Implementation of the mitigation measure below would minimize the potential exposure to workers, the public and the environment.

Mitigation Measure HAZ-1.SP: Prior to issuance of any building permit for sites where ground breaking activities would occur, all proposed development sites shall have a Phase I site assessment performed by a qualified environmental consulting firm in accordance with the industry required standard known as ASTM E 1527-13. The Phase I assessment shall include an evaluation for the potential presence of undocumented fills from offsite sources that may include contaminants of concern such as petroleum hydrocarbons, polycyclic aromatic hydrocarbons, and asbestos. If the Phase I assessment shows the potential for encountering hazardous releases, then Phase II site assessments or other appropriate analyses shall be conducted to determine the extent of the contamination and the process for remediation. All proposed development in the Plan Area where previous hazardous materials releases have occurred shall require remediation and cleanup to levels identified in an approved site specific Remedial Action Plan prepared by a licensed environmental

consulting firm and that considers potential exposure risks for the proposed new use of the site; or to levels established by the overseeing regulatory agency (San Mateo County Environmental Health (SMCEH), Regional Water Quality Control Board (RWQCB), or Department of Toxic Substances Control (DTSC). All proposed groundbreaking activities within areas of identified or suspected contamination shall be conducted according to a site specific health and safety plan, prepared by a licensed professional in accordance with Cal/OHSA regulations (contained in Title 8 of the California Code of Regulations) and approved by SMCEH prior to the commencement of groundbreaking. The health and safety plan shall consider and may include (but not be limited to) as appropriate the following example measures:

- Emergency Response Procedures, including location of nearest emergency care facility;
- Hazardous Materials Safety Data Sheets available onsite for all anticipated hazardous materials that could be used or encountered during construction;
- Personal Protective Equipment requirements for all persons onsite during construction;
- Isolation and protection of any excavated soils suspected of contamination; and/or
- Contact information for SMCEH, Fire Department, and qualified environmental consulting firm capable of obtaining samples for laboratory analysis.

Future development under the Plan Area would include commercial/retail, and residential uses that may handle, store, and transport various hazardous materials and consequently generate hazardous wastes. In general, current regulations require that all hazardous materials and wastes are stored, handled, and disposed of according to a host of safety requirements that are intended to protect human health and the environment. For general commercial/retail land uses as well as residential uses, hazardous materials are generally handled and transported in relatively small quantities and because the health effects associated with them are generally not as serious as industrial uses, significant adverse effects on the environment are less common.

Any applicant proposing land uses that would handle hazardous materials would be required to submit a Hazardous Materials Business Plan for review and approval by San Mateo County Environmental Health (SMCEH). Once approved this plan will be kept on file and updated as necessary. The purpose of the Hazardous Materials Business Plan is to ensure that employees are adequately trained to handle the materials and provides information to the Redwood City Fire Department should emergency response be required. The Hazardous Materials Business Plan typically includes the following, without limitation:

- The types of hazardous materials or chemicals stored and/or used on site;
- The location of such hazardous materials;
- An emergency response plan including employee training information; and
- A plan that describes the manner in which these materials are handled, transported and disposed.

Significance after Mitigation: Less than Significant

Impact HAZ-2.SP: Disturbance and release of hazardous structural and building components (i.e., asbestos, lead, PCBs, underground storage tanks, and above ground storage tanks) during demolition and construction phases of development or transport of these materials could expose construction workers, the public, or the environment to adverse conditions related to hazardous materials handling (Criterion a). (Less than Significant)

Based on the age of some of the structures within the Plan Area, some of the existing buildings in the Plan Area may contain asbestos, lead-based paint, and/or PCBs.

Asbestos

Potential exposure to asbestos, and its related chronic adverse health effects, is possible throughout demolition if materials that contain asbestos are present during operations. Based on the age of some of the buildings within the Plan Area, it is likely that some asbestos containing materials (ACMs) are present. Affected buildings would need appropriate abatement of identified asbestos prior to demolition. ACMs are regulated both as a hazardous air pollutant under the Clean Air Act and as a potential worker safety hazard under the authority of Cal-OSHA. The renovation or demolition of buildings containing asbestos would require retaining contractors who are licensed to conduct asbestos abatement work and notify the Bay Area Air Quality Management District (BAAQMD).

Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or abatement work. However, abatement of known or suspected ACMs, as verified by survey, would occur prior to demolition or construction activities pursuant to an asbestos abatement plan developed by a State-certified asbestos consultant as required by law. All ACMs would be removed and appropriately disposed of by a State-certified asbestos contractor. The City Building Division enforces these requirements through its requirements for demolition permits, which require an approved permit from the BAAQMD verifying the complete abatement of asbestos from any structure to be demolished, prior to issuance of a demolition permit. Adherence to all the aforementioned regulatory requirements would ensure that potential impacts related to ACMs would be less than significant, and no mitigation is required.

Lead and Lead-based Paint

Lead-based paint could be separated from building materials during any demolition processes. Separated paint can be classified as a hazardous waste if the lead content exceeds 1,000 parts per

million and would need to be disposed of accordingly. Additionally, lead-based paint chips can pose a hazard to workers and adjacent sensitive land uses. Both the Federal and California OSHAs regulate all worker exposure during construction activities that impact lead-based paint. Interim Final Rule found in 29 CFR Part 1926.62 covers construction work where employees may be exposed to lead during such activities as demolitions, removal, surface preparation for re-painting, renovation, clean up and routine maintenance. The OSHA-specified method of compliance includes respiratory protection, protective clothing, housekeeping, hygiene facilities, medical surveillance, training, etc. Potential violations related to lead can be reported to the EPA and the County Environmental Health Division for enforcement.

Demolition work could create exposure to lead-based paint present in building structures. Dust generating activities that include removal of walls, sanding, welding, and material disposal could produce airborne quantities of lead-laden material. These materials could expose workers and persons in close proximity, including occupants of offsite locations. The Plan Area contains buildings with painted surfaces, such as drywall, ceilings, and exterior stucco, which could contain lead-based paint.

Requirements for lead hazard evaluation and abatement activities, accreditation of training providers, and certification of individuals engaged in lead-based paint activities is found in California Code of Regulations Title 17, Section 35001 et seq. California's lead accreditation and certification program began in June, 1994. At that time, new childhood lead poisoning prevention legislation (codified in Health and Safety Code 105250 et seq.) required the California Department of Public Health (CDPH, formerly Department of Health Services) to create a program to certify lead-related construction trades-people and accredit lead-related construction training providers. Final regulations establishing this program took effect April 5, 1995. Revisions to these regulations that established work practice standards for lead-related construction and amended the previously established accreditation and certification requirements went into effect in January, 1999. These regulations were updated in April 2008.

With implementation of an abatement plan, as required, and all the regulatory requirements regarding identification, handling, and disposal of lead based paint, the potential impacts related to demolition activities of lead-based paint materials would be reduced to less-than-significant levels. No mitigation is required.

PCB-containing Materials

The presence of PCB-containing materials may be present within the existing structures in the Project Area. The detection of significant concentrations of PCBs indicates the former use and/or storage of PCBs in the Plan Area. Demolition of these structures could disturb these materials and expose workers or the public to adverse effects. Similar to the concerns of asbestos containing materials, an initial survey to determine the presence of PCBs would need to be conducted for a specific site followed by implementation of appropriate measures to handle any materials with PCBs.

Generally, the majority of PCB containing electrical transformers has been abated of PCBs. For the isolated locations where PCBs remain, appropriate identification and removal work would be required according to Federal and State standards. PCBs are managed under the Toxic Substances Control Act (TSCA) and the PCB regulations found at 40 Code of Federal Regulations 761. TSCA gives EPA's Office of Solid Waste and Emergency Response the authority to develop, implement and enforce regulations concerning the use, manufacture, cleanup and disposal of PCBs. Therefore, with adherence to regulatory requirements, the potential for PCBs in aboveground structures to impact Specific Plan activities would be reduced to less-than-significant levels.

Therefore, with adherence to the regulatory requirements that apply to hazardous building materials, the potential impacts from disturbance of these materials during demolition activities are reduced to less-than-significant levels.

Mitigation: None Required.

Impact HAZ-3.SP: Development under the Specific Plan could 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. (Criterion b) (Potentially Significant)

Any future construction activities would require the use of certain hazardous materials, such as fuels, oils, lubricants, solvents, and glues. Inadvertent release of these materials into the environment could adversely impact soil, surface waters, or groundwater quality. Larger developments could potentially include onsite storage and/or use of quantities of materials capable of significantly impacting soil and groundwater. Projects that disturb more than one acre would be required to adhere to the requirements of the General Construction Permit issued by the Regional Water Quality Control Board as discussed in Section 4.8, *Hydrology and Water Quality*. One of the requirements of the permit is the implementation of a storm water pollution prevention plan which includes measures to prevent the accidental release of hazardous materials used during construction. Implementation of the mitigation measure provided below would reduce the impacts to a less-than-significant level.

Mitigation Measure HAZ-3.SP: All development shall require the use of construction Best Management Practices (BMPs) to control handling of hazardous materials during construction to minimize the potential negative effects from accidental release to groundwater and soils. For any projects that disturb less than one acre, a list of BMPs to be implemented shall be part of building specifications and approved of by the City Building Department prior to issuance of a building permit.

Once constructed, development in the Plan Area would include commercial/retail, and residential uses that may handle, store, and transport various hazardous materials and consequently generate hazardous wastes. In general, current regulations require that all hazardous materials and wastes are stored, handled, and disposed of according to a host of safety requirements that are intended

to protect human health and the environment. For general commercial/retail land uses as well as residential uses, hazardous materials are generally handled and transported in relatively small quantities and because the health effects associated with them are generally not as serious as industrial uses, significant adverse effects on the environment are less common.

As noted previously, any commercial land uses that would handle hazardous materials would be required to submit a Hazardous Materials Business Plan for review and approval by the San Mateo County Environmental Health (SMCEH). The Plan would include spill response procedures and provide information to the Redwood City Fire Department should emergency response be required. The Hazardous Materials Business Plan typically includes the following:

- The types of hazardous materials or chemicals stored and/or used on site;
- The location of such hazardous materials;
- An emergency response plan including employee training information; and
- A plan that describes the manner in which these materials are handled, transported and disposed.

Implementation of this Plan would minimize the potential for upset and accidental release conditions as well as provide protocols to contain and/or minimize the extent of release should one occur. As a result, the impact of upset and accidental release conditions during the operational phases of future development would be less than significant.

Significance after Mitigation: Less than Significant.

Impact HAZ-4.SP: Development under the Specific Plan could be located on sites which are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment. (Criterion d) (Potentially Significant)

As noted above, the Plan Area includes a number of former land uses where a past release of hazardous materials has occurred (TRA, 2014). A review of the Enviorstor database maintained by the Department of Toxic Substances Control (DTSC) confirms that a number of active and closed cases are found within the Plan Area (DTSC, 2015). If legacy contaminants were to be exposed during construction or left beneath new development, workers, future occupants, or the public could be adversely affected through exposure where concentrations are high enough to cause harm. However, many of the sites identified by the TRA report and the more recent database search (DTSC, 2015) have been closed indicating that no further threat to human health or the environment remains. The sites that are still undergoing further investigation (e.g., 320 and 340 Blomquist Street as well as the UPRR offsite diesel spill) are being overseen by a regulatory agency to ensure that any identified contamination is fully characterized and below regulatory action levels. If not, then appropriate remediation efforts would be required prior to construction of any new development. In addition, with implementation of Mitigation Measure HAZ-1.SP

above, the potential for encountering any previously unidentified contamination would be minimized. As a result, the potential impact from sites within the Plan Area being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant with implementation of Mitigation Measure HAZ-1.SP.

Phase I Environmental Site Assessments were also completed for the following addresses; 320-350 Blomquist Street, 19 Stein Am Rhein Court, and 19 Seaport Boulevard (Iris, 2013; Iris, 2015a; and Iris, 2015b). The findings of these reports all determined that recognized environmental conditions were present within these addresses that warranted further investigation largely based on historical site uses. Tar-like materials were noted in near surface soils along with asbestos fibers associated with the former presence of the Pabco facility adjacent to the site. The Pabco facility manufactured linoleum, asbestos insulation, and asbestos cement shingles (Iris, 2013). Later development in areas surrounding the Pabco facility are thought to have received waste materials associated with asbestos producer causing fill materials to contain asbestos fibers. Other recognized environmental conditions include a past release of petroleum hydrocarbons associated with a Union Pacific Railroad spill, the presence of two former underground storage tanks that were left in place at 19 Seaport Boulevard, and truck washing/ maintenance activities that occurred at this location (Iris, 2015a, and Iris, 2015b).

The Remediation Action Plans for 320 and 340 Blomquist Street call for the excavation and removal of the chemicals of concern including the tar-like materials, polycyclic aromatic hydrocarbons (PAHs) petroleum hydrocarbons, volatile organic compounds (VOCs), metals, and asbestos (Iris, 2014b and Iris, 2014c). Preliminary estimates call for the removal of approximately 800 to 1,000 cubic yards (cy) at 320 Blomquist and approximately 3,000 cy at 340 Blomquist Street (Iris, 2014b, and 2014c).

Mitigation Measure HAZ-4.SP: Implement Mitigation Measure HAZ-1.SP.

Significance after Mitigation: Less than Significant

Impact HAZ-5.SP: Development under the Specific Plan could be located within the airport land use plan for the San Carlos Airport resulting in a safety hazard for people residing or working in the project area. (Criterion e) (Less than Significant)

The portion of the Plan Area located west of Maple Street is within the Airport Influence Area of the San Carlos Airport. Development in this area is subject to policies contained in the associated Airport Land Use Compatibility Plan (ALUCP). A range of uses could be developed in the Plan Area west of Maple, including residential, lodging and open space area; maximum building heights in this area is limited to 50 feet (including height bonus). Development that is not compatible with aviation activity (e.g., tall structures, land uses that produce glint/glare, land uses that attract wildlife that can be hazardous to aircraft, noise sensitive land uses, etc.) may lead to conflict between an airport operator and surrounding communities as well as create long-term

operational problems for the airport. In California, potential hazards to airport operations are generally regulated by the Federal Aviation Administration (FAA) (14 Code of Federal Regulations Part 77 (14 CFR Part 77)), with local planning and evaluation of proposed projects developed under the Specific Plan (in terms of a proposed project's compatibility in relationship to air and ground operations and the safety of the public) under the authority of the Airport Land Use Commission (ALUC) through ALUCPs. Prior to project approval, the proposed development under the Specific Plan would be submitted to the ALUC for review of compliance with the ALUCP as a part of their land use approval authority.

Therefore, considering that development under the Specific Plan would be required to comply with existing regulatory requirements 14 CFR Part 77 and review by the ALUC, potential adverse hazard impacts related to the proposed Plan are considered less than significant

Mitigation Measure: None Required.

4.7.6 Project-Level Impacts of the Harbor View Project

Impact HAZ-1.HV: Construction and operation of the Harbor View project could create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials. (Criterion a) (Potentially Significant)

Development of the proposed project would include earthwork activities that could encounter contaminants related to past land uses. If high enough levels of hazardous materials in excavated soils should go undetected, health and safety risks to workers and the public could occur. Exposure to hazardous materials could cause various short-term and/or long-term health effects. Possible health effects could be acute (immediate, or of short-term severity), chronic (long-term, recurring, or resulting from repeated exposure), or both. Acute effects, often resulting from a single exposure, could result in a range of effects from minor to major, such as nausea, vomiting, headache, dizziness, or burns. Chronic exposure could result in systemic damage or damage to organs, such as the lungs, liver, or kidneys. Health effects would be specific to each hazardous material.

As noted above in the setting section, contaminants of potential concern have been identified in various areas of the site some which will require remediation. Phase I Environmental Site Assessments have already been conducted and areas of concern identified. Remedial Action Plans have been prepared for the 320 and 340 Blomquist Street sites and based on the presence of recognized environmental conditions at 30 Stein Am Rhein Court and 19 Seaport Boulevard, there may be potential threats to human health at these sites requiring remediation. A Risk Management Plan was developed for the 320-350 Blomquist sites which would ensure that all future ground disturbing activities are done in a manner that protects workers and minimizes exposure of any contaminants that may be encountered (Iris, 2014a). Implementation of this plan

in addition to the measures provided in Mitigation Measure HAZ-1.SP, would minimize the potential exposure to workers, the public, and the environment.

Contamination may also be present from previously unidentified releases that occurred. It is not uncommon to encounter unexpected conditions once groundbreaking activities commence. As stated above, the implementation of Mitigation Measure HAZ-1.SP above, would minimize the potential exposure to workers, the public and the environment.

Once constructed, the operation of the Harbor View project would likely handle, store, and transport various hazardous materials and consequently generate hazardous wastes. In general, current regulations require that all hazardous materials and wastes are stored, handled, and disposed of according to a host of safety requirements that are intended to protect human health and the environment. Generally, hazardous materials uses associated with commercial land uses are handled and transported in relatively small quantities and because the health effects associated with them are typically not as serious as industrial uses, significant adverse effects on the environment are less common.

Nonetheless, the applicant would be required to submit a Hazardous Materials Business Plan for review and approval by the San Mateo County Environmental Health (SMCEH). Once approved this plan will be kept on file and updated as necessary. The Hazardous Materials Business Plan would ensure that employees are adequately trained to handle the materials and provides information to the Redwood City Fire Department should emergency response be required. Implementation of these existing regulatory requirements would ensure that the operational land uses that involve hazardous materials or wastes would be less than significant.

Mitigation Measure HAZ-1.HV: Implement Mitigation Measure HAZ-1.SP

Significance after Mitigation: Less than Significant.

Impact HAZ-2.HV: Disturbance and release of hazardous structural and building components (i.e., asbestos, lead, PCBs, underground storage tanks, and above ground storage tanks) with the Harbor View project during the demolition phase of construction or transport of these materials could expose construction workers, the public, or the environment to adverse conditions related to hazardous materials handling (Criteria a). (Less than Significant)

Based on the age of some of the structures within the project site, some of the existing buildings may contain asbestos, lead-based paint, and/or PCBs.

Asbestos

As noted above, potential exposure to asbestos, and its related chronic adverse health effects, is possible through demolition activities. Affected buildings would need appropriate abatement of any identified asbestos prior to demolition. ACMs are regulated both as a hazardous air pollutant

under the Clean Air Act and as a potential worker safety hazard under the authority of Cal-OSHA. Retaining licensed contractors to conduct asbestos abatement work is required as part of a demolition permit and includes notifying the Bay Area Air Quality Management District (BAAQMD). The City Building Division enforces these requirements through its requirements for demolition permits, which require an approved permit from the BAAQMD verifying the complete abatement of asbestos from any structure to be demolished, prior to issuance of a demolition permit. Adherence to all the aforementioned regulatory requirements would ensure that potential impacts related to ACMs would be less than significant.

Lead and Lead-based Paint

Lead-based paint could be separated from building materials during any demolition processes and pose a hazard to workers. Both the Federal and California OSHAs regulate all worker exposure during construction activities that impact lead-based paint. Interim Final Rule found in 29 CFR Part 1926.62 covers construction work where employees may be exposed to lead during such activities as demolitions, removal, surface preparation for re-painting, renovation, clean up and routine maintenance. The OSHA-specified method of compliance includes respiratory protection, protective clothing, housekeeping, hygiene facilities, medical surveillance, training, etc. Potential violations related to lead can be reported to the EPA and the County Environmental Health Division for enforcement.

Requirements for lead hazard evaluation and abatement activities, accreditation of training providers, and certification of individuals engaged in lead-based paint activities is found in California Code of Regulations Title 17, Section 35001 et seq. California's lead accreditation and certification program began in June, 1994. With implementation of an abatement plan, as required, and all the regulatory requirements regarding identification, handling, and disposal of lead based paint, the potential impacts related to demolition activities of lead-based paint materials would be reduced to less-than-significant levels. No mitigation is required.

PCB-containing Materials

The presence of PCB-containing materials may be present within the existing structures in the project site. Generally, the majority of PCB containing electrical transformers has been abated of PCBs. For the isolated locations where PCBs remain, appropriate identification and removal work would be required according to Federal and State standards. PCBs are managed under the Toxic Substances Control Act (TSCA) and the PCB regulations found at 40 Code of Federal Regulations 761. Therefore, with adherence to regulatory requirements, the potential for PCBs in aboveground structures to impact Specific Plan activities would be reduced to less-than-significant levels.

Therefore, with adherence to the regulatory requirements that apply to any identified hazardous building materials, the potential impacts from disturbance of these materials during demolition activities are reduced to less-than-significant levels.

Mitigation: None Required.

Impact HAZ-3.HV: Development of the Harbor View project could 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. (Criterion b) (Potentially Significant)

Any future construction activities would require the use of certain hazardous materials, such as fuels, oils, lubricants, solvents, and glues. Inadvertent release of these materials into the environment could adversely impact soil, surface waters, or groundwater quality. Larger developments could potentially include onsite storage and/or use of quantities of materials capable of significantly impacting soil and groundwater. Projects that disturb more than one acre would be required to adhere to the requirements of the General Construction Permit issued by the Regional Water Quality Control Board as discussed in Section 4.8, *Hydrology and Water Quality*. One of the requirements of the permit is the implementation of a storm water pollution prevention plan which includes measures to prevent the accidental release of hazardous materials used during construction. Implementation of the Mitigation Measure HAZ-3.SP, above, would reduce the impacts to a less-than-significant level.

Once constructed, as noted above, the future commercial use would be required to submit a Hazardous Materials Business Plan for review and approval by the San Mateo County Environmental Health (SMCEH). The Plan would include spill response procedures and provide information to the Redwood City Fire Department should emergency response be required. Implementation of this Plan would minimize the potential for upset and accidental release conditions as well as provide protocols to contain and/or minimize the extent of release should one occur. As a result, the impact of upset and accidental release conditions during the operational phases of future development would be less than significant.

Mitigation Measure HAZ-3.HV: Implement Mitigation Measure HAZ-3.SP.

Significance after Mitigation: Less than Significant.

Impact HAZ-4.HV: Development under the Specific Plan could 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, create a significant hazard to the public or environment. (Criterion d) (Potentially Significant)

According to the environmental evaluation for the Plan Area, the project site was identified as a location where a past release of hazardous materials has occurred (TRA, 2014). If legacy contaminants were to be exposed during construction or left beneath new development, workers, future occupants, or the public could be adversely affected through exposure where concentrations are high enough to cause harm. However, as noted above, additional site investigation work has occurred at the site and a risk management plan along with two remedial action plans for the site. Remediation objectives would be met prior to commencement of future development of the site. With implementation of the risk management plan, completion of the

remediation action plans, and Mitigation Measure HAZ-1a.SP above, the potential for encountering any previously unidentified contamination would be minimized. As a result, the potential impact from the project site being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant with implementation of Mitigation Measure HAZ-1.SP.

Mitigation Measure HAZ-4.HV: Implement Mitigation Measure HAZ-1.SP.

Significance after Mitigation: Less than Significant

Impact HAZ-5.HV: Development of the Harbor View project could be located within the airport land use plan for the San Carlos Airport resulting in a safety hazard for people residing or working in the project area. (Criterion e) (Less than Significant)

The portion of the Plan Area located west of Maple Street is within the Airport Influence Area of the San Carlos Airport. The project site is located east of Maple Street (Area A) and is therefore outside of the Airport Influence Area for the San Carlos Airport (Area B) that requires referral to the C/CAG Board and ALUC for a determination of the land use policy consistency. Therefore, development of the project will comply with the State requirement that all real estate sales or leases disclose the proximity of an airport as part of within the boundary. As a result the potential impact would be less than significant.

Mitigation Measure: None Required.

4.7.7 Cumulative Impacts

Impact HAZ-1.CU: Development under the Specific Plan and/or the Harbor View project, combined with cumulative development in the Plan Area and citywide, including past, present, existing, approved, pending, and reasonably foreseeable future development, could contribute considerably to cumulative impacts related to hazards and hazardous materials. (Potentially Significant)

Hazardous material impacts typically occur in a local or site-specific context versus a cumulative context combined with other development projects. It is possible, however for combined effects of transporting and disposal of hazardous materials to be affected by cumulative development.

Future development, with implementation of the identified mitigation measures above, would have a less than significant hazardous materials impact to the public or the environment within the vicinity of the project area. Other foreseeable development within the area, although likely increasing the potential to disturb existing contamination and potentially increase the handling of hazardous materials, would be required to comply with the same regulatory framework as the

proposed Specific Plan. These stringent regulatory requirements includes federal and state regulatory requirements for transporting (CalEPA and Caltrans) hazardous materials or cargo (including fuel and other materials used in all motor vehicles) on public roads or disposing of hazardous materials (CalEPA, Department of Toxic Substances Control, San Mateo County Environmental Health). Therefore, the effect of the project on hazardous materials, in combination with other foreseeable projects, would be less than significant. Therefore, no additional mitigation is required.

Mitigation Measure HAZ-1.CU: Implement Mitigation Measures **HAZ-1.SP (HAZ-1.HV and HAZ-4.HV)**, through **HAZ-3.SP** (same as **HAZ-3.HV**).

Significance after Mitigation: Less than Significant

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