4.7 HAZARDS AND HAZARDOUS MATERIALS

This chapter describes the environmental setting, including regulatory framework and existing conditions in the Specific Plan Area. It also evaluates the potential environmental consequences of future development that could occur by adopting and implementing the proposed Specific Plan Update, and approval and development of the proposed Transit-Oriented Developments (TOD) #1 and #2 (together referred to as the "proposed Project"), with regard to potentially significant direct and indirect environmental impacts related to hazardous materials, airport hazards, emergency response plans, and wildland fires.

The analysis in this chapter is based in part on the following reports:

- ATC Associates, Inc. 2007. Phase I Environmental Site Assessment of Millbrae Station Pavilion, 10-200 El Camino Real and 133 and 150 Serra Avenue, Millbrae, California 94030. September 12, 2007.
- ATC Associates, Inc. 2011. Phase I Environmental Site Assessment of Millbrae Station Lumber Yard & Cabinet Shop, 190 and 200 El Camino Real, Millbrae, California 94030. March 18, 2011.
- Cornerstone Earth Group. 2013. Phase I Environmental Site Assessment of Millbrae BART Station Transit-Oriental Development, Millbrae, California. December 13, 2013.

The above-referenced environmental site assessment reports are included in this Draft EIR as Appendix E, Hazards and Hazardous Materials Data.

4.7.1 ENVIRONMENTAL SETTING

4.7.1.1 REGULATORY FRAMEWORK

Hazardous materials refer generally to hazardous substances, hazardous waste, and other materials that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g. household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g. electronics, newspapers, plastic products, etc.). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials have a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

The term "hazardous materials" as used in this section includes all materials defined in the California Health and Safety Code (H&SC):

> "A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. 'Hazardous materials' include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a

reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment."

The term includes chemicals regulated by the United States Department of Transportation (USDOT), the United States Environmental Protection Agency (US EPA), the California Department of Toxic Substances Control (DTSC), the California Governor's Office of Emergency Services (CalOES), and other agencies as hazardous materials, wastes, or substances. "Hazardous waste" is any hazardous material that has been discarded, except those materials specifically excluded by regulation. Hazardous materials that have been intentionally disposed of or inadvertently released fall within the definition of "discarded" materials and can result in the creation of hazardous waste. Hazardous wastes are broadly characterized by their ignitability, toxicity, corrosivity, reactivity, radioactivity, or bioactivity. Federal and State hazardous waste definitions are similar, but contain enough distinctions that separate classifications are in place for federal Resource Conservation and Recovery Act (RCRA) hazardous wastes and State non-RCRA hazardous wastes. Hazardous wastes require special handling and disposal because of their potential to impact public health and the environment. Some materials are designated "acutely" or "extremely" hazardous under relevant statutes and regulations.

Hazardous materials and wastes can pose a significant actual or potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Many federal, State, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent these unwanted consequences. These regulatory programs are designed to reduce the danger that hazardous substances may pose to people and businesses under normal daily circumstances and as a result of emergencies and disasters.

Federal Regulations

United States Environmental Protection Agency

The US EPA laws and regulations ensure the safe production, handling, disposal, and transportation of hazardous materials. Laws and regulations established by the US EPA are enforced in San Mateo County by the California Environmental Protection Agency (CalEPA).

United States Department of Transportation

The USDOT has the regulatory responsibility for the safe transportation of hazardous materials between states and to foreign countries. The USDOT regulations govern all means of transportation, except for those packages shipped by mail, which are covered by United States Postal Service regulations. The federal RCRA of 1976 imposes additional standards for the transport of hazardous wastes.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration (OSHA) oversees the administration of the Occupational Safety and Health Act, which requires specific training for hazardous materials handlers, provision of information to employees who may be exposed to hazardous materials, and acquisition of material safety data sheets (MSDS) from materials manufacturers. The MSDS describe the risks, as well as proper handling and procedures, related to

particular hazardous materials. Employee training must include response and remediation procedures for hazardous materials releases and exposures.

State Regulations

California Health and Safety Code and Code of Regulations

California Health and Safety Code Chapter 6.95 and California Code of Regulations, Title 19, Section 2729, set out the minimum requirements for business emergency plans and chemical inventory reporting. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on-site. A business which uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities.

California Environmental Protection Agency

One of the primary agencies that regulate hazardous materials is the CalEPA. The State, through CalEPA, is authorized by the US EPA to enforce and implement certain federal hazardous materials laws and regulations. The California DTSC, a department of the CalEPA, protects California and Californians from exposure to hazardous waste, primarily under the authority of the RCRA and the California Health and Safety Code.[1] The DTSC requirements include the need for written programs and response plans, such as Hazardous Materials Business Plans (HMBPs). The DTSC programs include dealing with aftermath clean-ups of improper hazardous waste management, evaluation of samples taken from sites, enforcement of regulations regarding use, storage, and disposal of hazardous materials, and encouragement of pollution prevention.

California Division of Occupational Safety and Health

Like OSHA at the federal level, the California Division of Occupational Safety and Health (CalOSHA) is the responsible state-level agency for ensuring workplace safety. The CalOSHA assumes primary responsibility for the adoption and enforcement of standards regarding workplace safety and safety practices. In the event that a site is contaminated, a Site Safety Plan must be crafted and implemented to protect the safety of workers. Site Safety Plans establish policies, practices, and procedures to prevent the exposure of workers and members of the public to hazardous materials originating from contaminated sites or buildings.

California Building Code

The State of California provided a minimum standard for building design through the California Building Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations (CCR). The CBC is based on the 1997 Uniform Building Code, but has been modified for California conditions. The CBC is updated every 3 years, and the current CBC went into effect in January 2014. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings

[1] Hazardous Substance Account, Chapter 6.5 (Section 25100 et seq.) and the Hazardous Waste Control Law, Chapter 6.8 (Section 25300 et seq.) of the Health and Safety Code.

are plan-checked by local city and county building officials for compliance with the CBC typical fire safety requirements of the CBC included; the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

California Emergency Management Agency

The California Emergency Management Agency (CalEMA) was established as part of the Governor's Office on January 1, 2009 – created by Assembly Bill (AB) 38 (Nava), which merged the duties, powers, purposes, and responsibilities of the former Governor's Office of Emergency Services with those of the Governor's Office of Homeland Security. The CalEMA is responsible for the coordination of overall State agency response to major disasters in support of local government. The agency is responsible for assuring the State's readiness to respond to and recover from all hazards – natural, manmade, emergencies, and disasters – and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire threat potential throughout California.[2] CAL FIRE ranks fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The rankings include no fire threat, moderate, high, and very high fire threat. Additionally, the CAL FIRE produced the 2010 Strategic Fire Plan for California, which contains goals, objectives, and policies to prepare for and mitigate for the effects of fire on California's natural and built environments.[3]

California Fire Code

California Code of Regulations, Title 24, also known as the California Building Standards Code, contains the California Fire Code (CFC), included as Part 9 of that Title. Updated every 3 years, the CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Similar to the CBC, the CFC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions.

California Department of Transportation and California Highway Patrol

Two State agencies have primary responsibility for enforcing federal and State regulations and responding to hazardous materials transportation emergencies: the California Highway Patrol (CHP) and the California Department of Transportation (Caltrans). Caltrans manages more than 50,000 miles of California's highway and freeway lanes, provides intercity rail services, permits more than 400 public-use airports and special-use hospital heliports, and works with local agencies. Caltrans is also the first responder for hazardous material spills and releases that occur on those highway and freeway lanes and intercity rail services.

[2] CalFIRE, http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_development.php, accessed December 2, 2014.

[3] CalFIRE, *2010 Strategic Fire Plan for California,* http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf668.pdf, accessed December 2, 2014.

The CHP enforces hazardous materials and hazardous waste labeling and packing regulations designed to prevent leakage and spills of materials in transit and to provide detailed information to cleanup crews in the event of an accident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of the CHP, which conducts regular inspections of licensed transporters to assure regulatory compliance. In addition, the State of California regulates the transportation of hazardous waste originating or passing through the State.

Common carriers are licensed by the CHP, pursuant to the California Vehicle Code, Section 32000. This section requires licensing every motor (common) carrier who transports, for a fee, in excess of 500 pounds of hazardous materials at one time and every carrier, if not for hire, who carries more than 1,000 pounds of hazardous material of the type requiring placards. Common carriers conduct a large portion of the business in the delivery of hazardous materials.

Federal and State Hazardous Materials-Specific Programs and Regulations

Asbestos-Containing Materials Regulations

Asbestos-containing materials (ACM) are materials that contain asbestos, a naturally occurring fibrous mineral that has been mined for its useful thermal properties and tensile strength. ACM is generally defined as either friable or non-friable. Friable ACM is defined as any material containing more than one percent asbestos. Friable ACM is more likely to produce airborne fibers than non-friable ACM, and can be crumpled, pulverized, or reduced to powder by hand pressure. Non-friable ACM is defined as any material containing one percent or less asbestos. Non-friable ACM cannot be crumpled, pulverized, or reduced to powder by hand pressure. When left intact and undisturbed, ACM does not pose a health risk to building occupants. Potential for human exposure occurs when ACM becomes damaged to the extent that asbestos fibers become airborne and are inhaled. Inhalation of asbestos airborne fibers can lead to various health problems, the most serious of which includes lung disease.

State-level agencies, in conjunction with the US EPA and OSHA, regulate removal, abatement, and transport procedures for ACMs. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations and medical evaluation and monitoring is required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk for asbestos emissions and exposure. Finally, federal, State, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Lead-Based Paint

Lead-based paint (LBP), which can result in lead poisoning when consumed or inhaled, was widely used in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACM, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance will result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety Commission. Therefore, only buildings built before 1978 are presumed to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual.

Polychlorinated Biphenyls

The US EPA prohibited the use of polychlorinated biphenyls (PCBs) in the majority of new electrical equipment starting in 1979, and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act (TSCA), 15 United States Code Section 2601 et seq. Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and outline highly specific safety procedures for their disposal. The State of California likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed accordingly. At lower concentrations for non-liquids, regional water quality control boards may exercise discretion over the classification of such wastes.

CalOSHA's Lead in Construction Standard is contained in Title 8, Section 1532.1 of the California Code of Regulations. The regulations address all of the following areas: permissible exposure limits (PELs); exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection (MRP); employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

Regional Agencies and Regulations

San Francisco Bay Regional Water Quality Control Board

The Porter-Cologne Water Quality Act[4] established the State Water Resources Control Board (SWRCB) and divided the state into nine regional basins, each under the jurisdiction of a Regional Water Quality Control Board (RWQCB). The San Francisco Bay Region (Region 2) is the Regional Water Quality Control Board (San Francisco Bay RWQCB), which regulates water quality in the Project area. The San Francisco Bay RWQCB has the authority to require groundwater investigations when the quality of groundwater or surface waters of the state is threatened, and to require remediation actions, if necessary.

Bay Area Air Quality Management District

The Bay Area Air Quality Management District (BAAQMD) has primary responsibility for control of air pollution from sources other than motor vehicles and consumer products (which are the responsibility of CalEPA and California Air Resources Board [CARB]). The BAAQMD is responsible for preparing attainment plans for non-attainment criteria pollutants, control of stationary air pollutant sources, and the issuance of permits for activities including demolition and renovation activities affecting asbestos containing materials (District Regulation 11, Rule 2) and lead (District Regulation 11, Rule 1).

The City adopted the Association of Bay Area Governments (ABAG) Multi-Jurisdictional Hazard Mitigation Plan, updated in 2010. The plan identifies measures to reduce the impacts of natural and manmade hazards and to facilitate the recovery and repair of structures if damage if damage should occur from hazardous events. Adoption

[4] California Water Code Sections 13000 et seq.

of the plan ensures that the City is eligible for certain federal and State funds for disaster recovery in case of such an event.

San Mateo County Health System

The San Mateo County Health System hazardous materials Program is the local Certified Unified Program Agency (CUPA). A local CUPA is responsible for administering/overseeing compliance with the following programs, as required by state and federal regulations:

- Hazardous Materials Release Response Plans and Inventories (Area Plans)
- California Accidental Release Prevention (CalARP) Program
- Underground Storage Tank Program (UST)
- Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control and Countermeasure (SPCC) Plans (AST)
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs
- California Fire Code: Hazardous Material Management Plans and Hazardous Material Inventory Statements

Businesses, such as photographic, chrome plating or service stations, which generate small amount of hazardous waste or require underground storage of hazardous materials, require a permit from the department.

San Mateo County Sheriff's Office of Emergency Services and Homeland Security

The Emergency Management Program is a county-wide system that provides emergency management actions for the prevention of, preparedness for, response to, and recovery from, any emergency or disaster. The system encompasses all jurisdiction organizations, agencies, departments, entities, and individuals responsible for emergency management activities. The program provides a common framework for which a variety of agencies may work together effectively. Additionally, the program provides standardized and coordinated emergency management procedures.

Under the Emergency Management Program, the Office of Emergency Services has initiated the process of updating the 2007 County Emergency Operations Plan (EOP). The primary focus of the revision process has been the departure from an all-encompassing "EOP" concept, which describes emergency management phases in brief—to the adoption of separate plans, which provide detailed actions and procedures. This will provide a more comprehensive Emergency Management Program.

The EOP describes and identifies the agencies, jurisdictions, and actions during a response to an emergency, the role of the Emergency Operations Center (EOC), and the coordination that occurs between the EOC and City/Town departments and agencies. Forthcoming annexes and appendices to this plan will describe in more detail response actions and hazards specific to the jurisdiction. While these are in development, existing departmental plans and hazard specific annexes remain in effect.

San Francisco International Airport Land Use Compatibility Plan

The *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport,* adopted in 2012, is the Airport Land Use Compatibility Plan (ALUCP) for SFO. As discussed in Chapter 3, Project

Description, of this Draft EIR, the Specific Plan Area is within Airport Influence Area (AIA) A and B. The SFO ALUCP establishes airspace protection policies to prevent potential safety hazards that could be caused by the construction of tall structures compromising the airspace in the SFO vicinity. The airspace protection policies listed in Table 4.7-1 are identified as applicable to the Specific Plan Update. These policies help determine what kind of development is allowed or prohibited in the Specific Plan Area and understand the necessary steps for proposed development.

TABLE 4.7-1 AIRSPACE PROTECTION POLICIES APPLICABLE TO THE SPECIFIC PLAN AREA

Number	Policy
AP-1.1	Local Government Responsibility to Notify Project Sponsors. Local governments should notify sponsors of proposed projects at the earliest opportunity to file Form 7460-1, *Notice of Proposed Construction or Alteration*, with the FAA for any proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10. Under Federal law, it is the responsibility of the project sponsor to comply with all notification and other requirements described in 14 CFR Part 77. This requirement applies independent of this ALUCP.
AP-1.2	FAA Aeronautical Study Findings Required Before Processing Development Application. The sponsor of a proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10, shall present to the local government permitting agency with his or her application for a development permit, a copy of the findings of the FAA's aeronautical study, or evidence demonstrating that he or she is exempt from having to file an FAA From 7460-1. It is the responsibility of the local agency to consider the FAA determination study findings as part of its review and decision on the proposed project.
AP-2	Compliance with Findings of FAA Aeronautical Studies. Project sponsors shall be required to comply with the findings of FAA aeronautical studies with respect to any recommended alterations in the building design and height any recommended marking and lighting of their proposed projects to be deemed consistent with this ALUCP.
AP-3	Maximum Compatible Building Height. In order to be deemed consistent with the [SFO] ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surface map (Exhibits IV-17 and IV-18), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1. For the vast majority of parcels, the height limits established in local zoning ordinances are lower than the critical airspace surfaces. In those cases, the zoning district height regulations will control. Compliance with the zoning district height and the SFO critical aeronautical surfaces map, however, does not relieve the construction sponsor of the obligation to file a FAA Form 7460-1 Notice of Proposed Construction or Alteration, if required, and to comply with the determinations resulting from the FAA's aeronautical study. For a project to be consistent with this ALUCP, no local agency development permits shall be issued for any proposed structure that would penetrate the aeronautical surfaces shown on Exhibits IV-17 and IV-18 or the construction of which has not received a Determination of No Hazard from the FAA, or which would cause the FAA to increase the minimum visibility requirements for any instrument approach or departure procedure at the Airport.
AP-4	Other Flight Hazards are Incompatible. Proposed land uses with characteristics that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport or in flight are incompatible in Area B of the Airport Influence Area. They may be permitted only if the uses are consistent with the FAA rules and regulations. Proof of consistency with FAA rules and regulations and with any performance standards cited below must be provided to the Airport Land Use Commission (C/CAG Board) by the sponsor of the proposed land use action. Specific characteristics that may create hazards to aircraft in flight and which are incompatible include:

TABLE 4.7-1 AIRSPACE PROTECTION POLICIES APPLICABLE TO THE SPECIFIC PLAN AREA

Number	Policy
	▪ Source of glare, such as highly reflective buildings or building features, or bright lights, including search lights or laser displays, which would interfere with the vision of pilots making approaches to the Airport. ▪ Distracting lights that would be mistaken by pilots on approach to the Airport for airport identification lighting, runway edge lighting, runway end identification lighting, or runway approach lighting. ▪ Sources of dust, smoke, or water vapor that may impair the vision of pilots making approaches to the Airport. ▪ Sources of electrical interference with aircraft of air traffic control communications or navigation equipment, including radar. ▪ Land uses that, as a regular byproduct of their operations, produce thermal plumes with the potential to rise high enough and at sufficient velocities to interfere with the control of aircraft in flight. Upward velocities of 4.3 meters (14.1 feet) per second at altitudes above 200 feet above the ground shall be considered as potentially interfering with the control of aircraft in flight. ▪ Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, FAA Order 5200.5A, *Waste Disposal Sites On or Near Airports*, FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports*, and any successor or replacement orders or advisory circulars. Exceptions to this policy are acceptable for wetlands or other environmental mitigation projects required by ordinance, stature, court order, or Record of Decision issued by a federal agency under the National Environmental Policy Act.

Source: City/County Association of Governments of San Mateo County, 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.

Land use and building regulations within the Specific Plan Area are affected by SFO's "Safety Compatibility Zones" and building height limits. The Specific Plan Area is within the Safety Compatibility Zones 1, 2, and 3, the standards established for which determine the allowed and incompatible uses as shown in Table 4.7-2 and Figure 4.7-1.

TABLE 4.7-2 SAFETY COMPATIBILITY CRITERIA

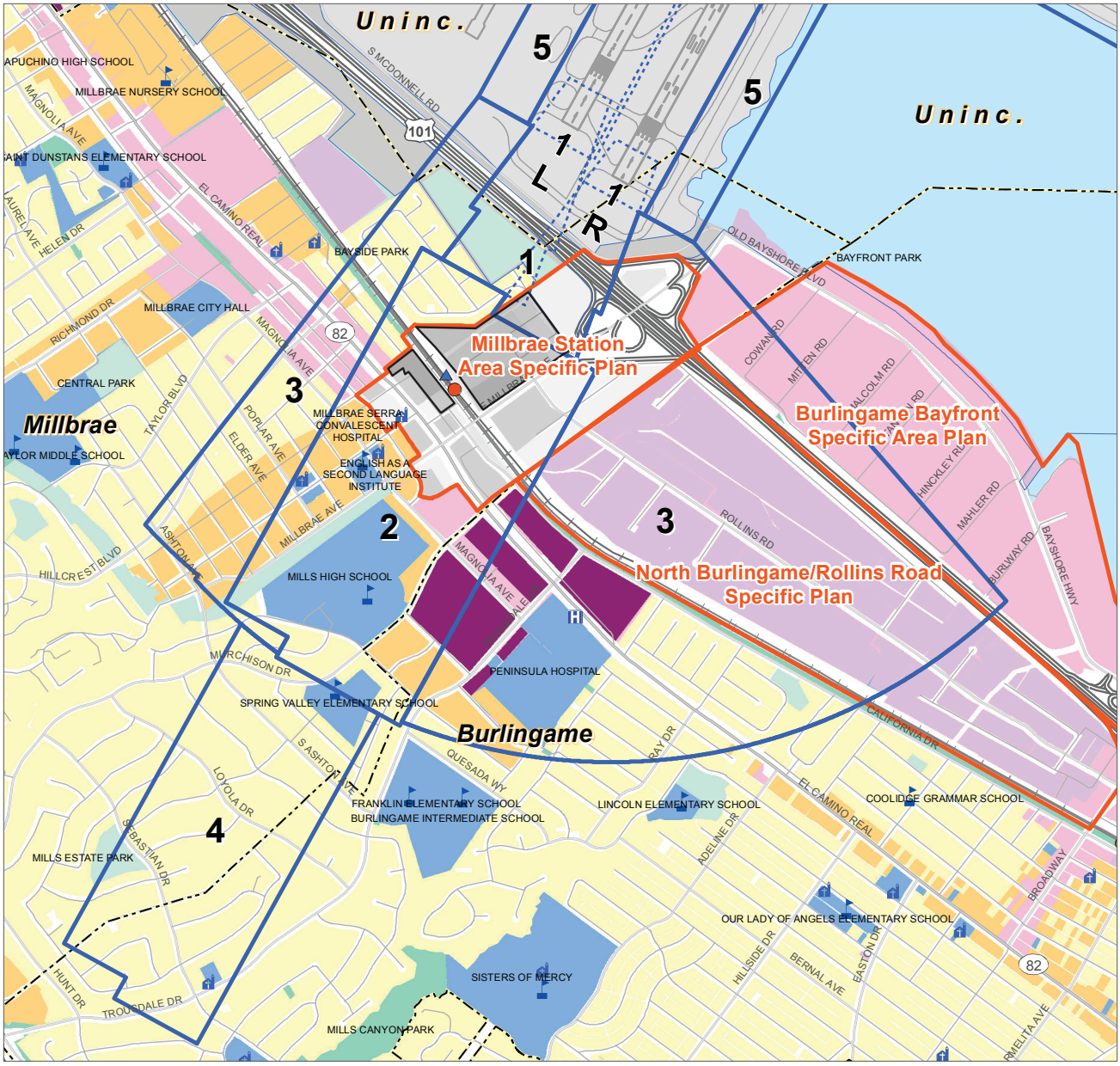
		Land Use Criteria	
Zone	Description	Incompatible[a]	Avoid[a]
Zone 1 Runway Protection Zone and Object Free Area (RPZ-OFA)	Zone 1 includes the RPZ and the OFA, areas defined according to FAA airport to FAA airport design criteria. The RPZ is a trapezoid-shaped area off each runway end, with the dimensions based on the runway approach visibility minimums and the type of aircraft using the runway. The OFA is a rectangular area centered on each runway within which objects, other than those serving a specific aeronautical purpose, are to be prohibited. Zone 1 is an area of relatively high accident risk that FAA encourages airport proprietors to own and keep free of objects, structures, and incompatible uses, including places of assembly (housing, churches, schools,	– All new structures[c] – Places of assembly not in structures – Hazardous uses[b] – Critical public utilities	– Nonresidential uses except very low intensity uses in the "controlled activity area. [b]

TABLE 4.7-2 SAFETY COMPATIBILITY CRITERIA

Zone	Description	Land Use Criteria: Incompatible[a]	Land Use Criteria: Avoid[a]
	shopping centers, hospitals, and the like), fuel storage, and wildlife attractants.		
Zone 2 Inner Approach/ Departure Zone (IADZ)	Zone 2, the IADZ, is designated along the extended centerline of each runway beginning at the outer edge of the RPZ. It is an area of secondary accident risk that tends to be overflown by most aircraft arrivals and departures from each runway end.	– Children's schools[b] – Large child day care centers and noncommercial employer-sponsored centers ancillary to a place of business[b] – Hospitals, nursing homes – Hazardous uses[b] – Critical public utilities[b] – Theaters, meeting halls, places of assembly seating more than 300 people – Stadiums, arenas	
Zone 3 Inner Turning Zone (ITZ)	Zone 3, the ITZ, lies alongside the RPZ and IADZ. It is an area overflown by aircraft making turns at low altitude immediately after takeoff. It tends to be subject to lower accident risk than the IADZ.	– Biosafety Level 3 and 4 facilities – Children's schools – Large child day care centers – Hospitals, nursing homes – Stadiums, arenas	– Hazardous uses other than Biosafety Level 3 and 4 facilities – Critical public utilities

Note: Please see note 4 of Table IV-2 (2 of 2) Safety Compatibility Criteria on page IV-32 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.
a. See note 1 of Table IV-2 (2 of 2) Safety Compatibility Criteria on page IV-32 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.
b. See note 2 of Table IV-2 (2 of 2) Safety Compatibility Criteria on page IV-32 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.
c. See note 3 of Table IV-2 (2 of 2) Safety Compatibility Criteria on page IV-32 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.
Source: City/County Association of Governments of San Mateo County, 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.

Building heights within the AIA are regulated by the FAA through the ALUCP's Airspace Protection policies. These policies are intended to protect the "aeronautical surfaces" from potential hazards, such as structures encroaching into the critical aeronautical surfaces. As shown in Figure 4.7-2, the building height limits within the Specific Plan Area range from 50 to 175 feet above average mean sea level (MSL), depending on the structure's location.



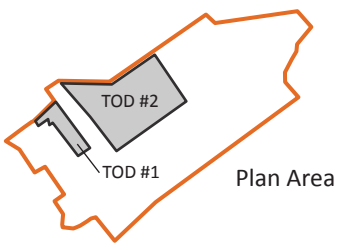
Source: Local Plans: San Bruno General Plan, December 2008; South San Francisco General Plan, 1998.

Safety Compatibility Zones

- 1 - Runway Protection Zone-Object Free Area
- 2 - Inner Approach/Departure Zone
- 3 - Inner Turning Zone
- 4 - Outer Approach/Departure Zone
- 5 - Sideline Zones
- Internal boundaries of ALP-defined areas
- Specific Plan Area
- Airport Property
- BART Station
- CALTRAIN Station
- School
- Place of Worship
- Hospital
- Municipal Boundary
- Railroad
- Freeway
- Major Road
- Road

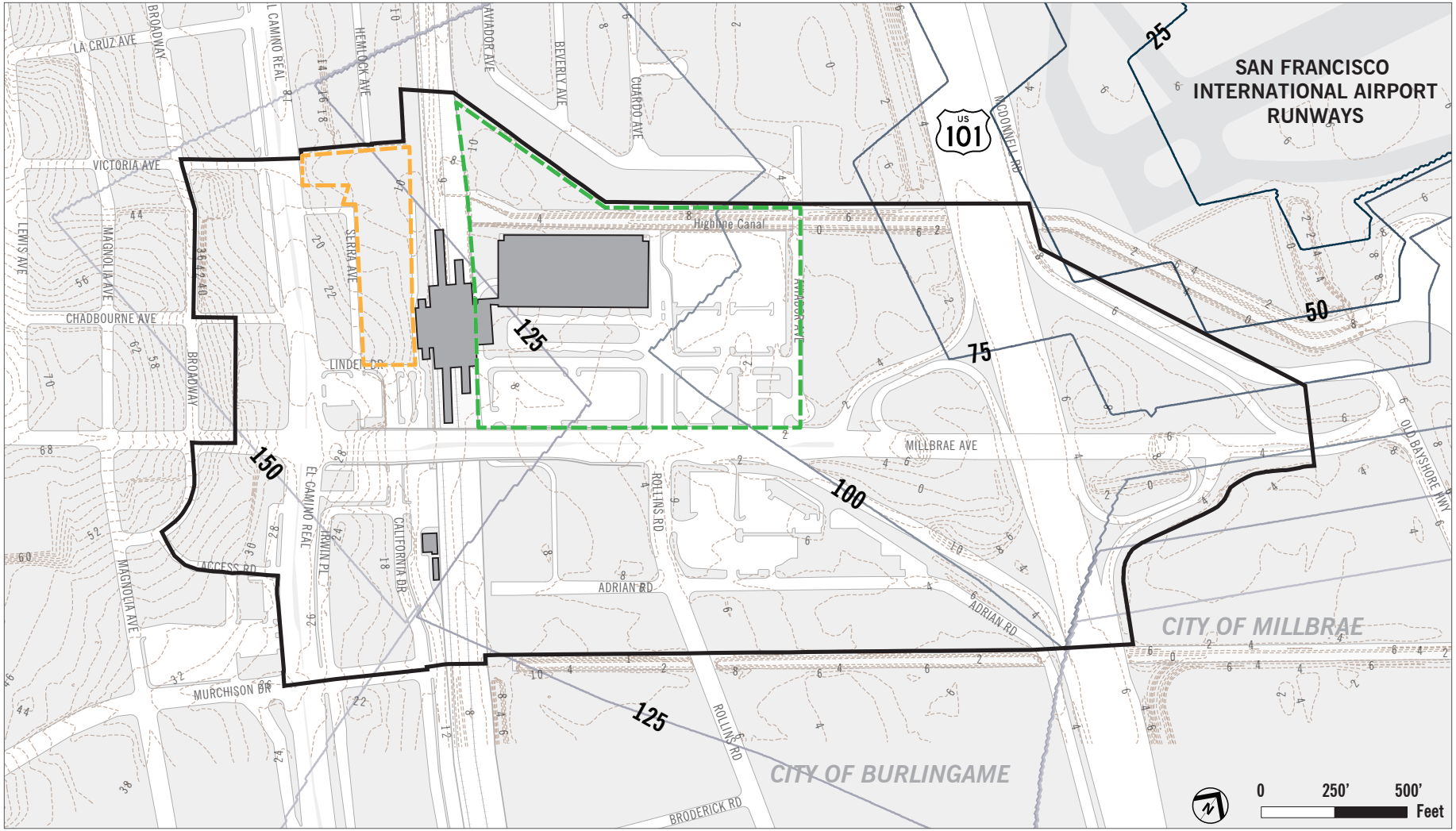
Planned Land Use Per General Plans

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space



0 .5
Scale (Miles)

Figure 4.7-1
Safety Compatibility Zones



Source: City/County of San Mateo. Comprehensive Land Use Compatibility Plan for the Environs of San Francisco, 2011.

75 Elevation of Aeronautical Surfaces (Mean Sea Level)
8 Ground Level (Feet)
Millbrae Station
MSASP Boundary

Note: Maximum building height is calculated by subtracting the ground level (represented by elevation contours) from the Aeronautical Surfaces elevation.

TOD #1 Boundary
TOD #2 Boundary

Figure 4.7-2
Critical Aeronautical Surfaces

Local Regulations

Millbrae 1998-2015 General Plan

The City of Millbrae General Plan outlines various goals, policies and implementing programs relevant to hazards and hazardous materials in the Safety Element. The policies relevant to the proposed Project are listed in Table 4.7-3.

TABLE 4.7-3 GENERAL PLAN POLICIES RELEVANT TO HAZARDS AND HAZARDOUS MATERIALS

Number	Policy
Safety (S) Element	
S1.13	Electromagnetic Fields. The City will monitor available information regarding possible health hazards of electromagnetic fields and will continue to prohibit the construction of permanent buildings directly beneath electrical transmission lines.
S1.15	Fire Hazard Abatement. Enforce the prompt abatement of identified fire hazards.
S1.20	Airport Safety. Regulate land uses in the vicinity of San Francisco International Airport to assure safety of aircraft and of persons and property near the Airport. Limit building height easterly of El Camino Real consistent with the Millbrae Station Area Specific Plan.
S2.4	Adequate Police and Fire Services. The City shall continue to maintain police and fire departments adequate in manpower, equipment and resources to respond to any fire or other localized emergency within the City. Use of supplemental volunteers should be considered.
S2.5	"Mutual Aid Agreements". The City shall maintain its mutual aid agreements with San Francisco International Airport and neighboring cities to insure adequate response to large scale emergencies and multiple simultaneous incidents which exceed the capabilities of local resources. The Millbrae Police and Fire Departments will continue to maintain and enhance "mutual aid agreements" with other agencies on a local, state and national level according to the scale of the emergency.
S2.6	Access for Emergency Vehicles. Provide adequate access for emergency vehicles and equipment, including providing a second means of ingress and egress to all development. Do not permit new cul-de-sacs in excess of 500 feet in length, unless there is secondary emergency access approved by the Fire Chief.
S2.10	Public Facilities. Locate and design emergency buildings and vital utilities, communication systems and other public facilities so that they remain operational during and after an emergency or disaster.

Source: City of Millbrae General Plan 1998-2015, adopted 1998.

Millbrae Municipal Code

The City of Millbrae Municipal Code contains all ordinances for the city. The Municipal Code is organized by Title, Chapter, and Section. The current Municipal Code is up to date through Ordinance 747, passed May 27, 2014. The following provisions of Title 4, Public Safety, and Title 9, Building Regulations, of the Municipal Code help to minimize adverse effects from hazards and hazardous materials in Millbrae.

- **Chapter 4.65 Hazardous Materials Storage.** This chapter promotes the protection of health, life, resources and property through prevention and control of unauthorized discharges of hazardous materials.

- **Chapter 9.05 Building Code.** Per Section 9.05.010 the City has adopted the 2013 California Building Code including modifications relevant to Millbrae. The California Building Code includes standards for the treatment of hazardous materials.
- **Chapter 9.30 Fire Code.** Per Section 9.30.010, Adoption of California Fire Code, 2013 Edition, the City adopted the 2013 CFC (Title 24, Part 9, CFC and the International Fire Code, 2012 Edition, as amended by the state of California). The Fire Code includes regulations governing the maintenance of buildings and premises and regulates the storage, use and handling of dangerous and hazardous materials, substances and processes, and by regulating the maintenance of adequate egress facilities in the City of Millbrae
- **Chapter 9.55 Buildings Hazardous to Air Navigation.** This chapter contains provisions for issuing building permits with regards to creating hazards to air navigation. Under this Chapter, no building permits for any building exceeding thirty feet in height and which building falls within the notice criteria established by Part 77 of Chapter 1, Title 14, of the Code of Federal Regulations, shall be issued until notice of the proposed construction is given to the FAA as required in said regulations, and an acknowledgment is issued by said agency that said structure does not represent a hazard to air navigation. The building inspector of the City shall not issue any building permit for any building within the purview of this chapter until he has on file in his office a copy of the acknowledgment by the Federal Aviation Agency that said structure does not represent a hazard to air navigation. In the event the Federal Aviation Agency finds that a structure falling within the purview of this chapter represents a hazard to air navigation, and the building inspector receives notice thereof, the building inspector shall immediately notify the city council for such action as the council may deem necessary in view of such finding.

4.7.1.2 EXISTING CONDITIONS

This section describes existing conditions generally in the Specific Plan Area, and more specifically in the two TOD project sites located within the Specific Plan Area, related to hazardous materials, schools, airport hazards, and wildland fires. The Specific Plan Area is roughly 116 acres in size and is bounded generally by Broadway to the West, Victoria Avenue and the Highline Canal to the north, the Highway 101 interchange to the east, and Murchison Drive to the south. Current land uses within the Specific Plan Area include various commercial, light industrial, and multi-family residential. The corridor west of El Camino Real is occupied by two large mixed-use projects, containing ground floor retail and service uses and restaurants. Land uses along the east side of the corridor include a bank, a motel, and restaurants. Uses between El Camino Real and the railroad tracks south of Millbrae Avenue include convalescent homes, a taxi-waiting area, and parking lot. Storage structures and some office and service uses occupy most of the area south of Millbrae Avenue and east of the railroad tracks. One exception is a new retail project that was recently completed on a site next to the freeway on-ramp, on the east side of Rollins Road. It includes a variety of retail service uses, such as restaurants, a car wash, and a gas station.

Specific Plan Area

Hazardous Materials Sites

California Government Code Section 65962.5 requires the CalEPA to compile, maintain, and update specified lists of hazardous material release sites. The California Environmental Quality Act (CEQA) (California Public

Resources Code Section 21092.6) require the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether the project and any alternatives are identified on any of the following lists:

- **EPA NPL:** The US EPA's National Priorities List includes all sites under the US EPA's Superfund program, which was established to fund cleanup of contaminated sites that pose risk to human health and the environment.
- **EPA CERCLIS and Archived Sites:** The US EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), includes a list of 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned (NFRAP) status.
- **EPA RCRIS (RCRA Info):** The Resource Conservation and Recovery Act Information System (RCRIS or RCRA Info) is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List:** The DTSC maintains the Hazardous Waste and Substances Sites (Cortese) list as a planning document for use by the State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet:** The DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS:** This stands for the Leaking Underground Storage Tank Information System (LUST or LUSTIS) and the SWRCB maintains an inventory of USTs and leaking USTs, which tracks unauthorized releases.

The required lists of hazardous material release sites are commonly referred to as the "Cortese List" after the legislator who authorized the legislation. Because the statute was enacted more than 20 years ago, some of the provisions refer to agency activities that were conducted many years ago and are no longer being implemented and, in some cases, the information required in the Cortese List does not exist. Those requesting a copy of the Cortese Lists are now referred directly to the appropriate information resources contained on internet websites hosted by the boards or departments referenced in the statute, including DTSC's online EnviroStor[5] database and the SWRCB's online GeoTracker database.[6] These two databases include hazardous material release sites, along with other categories of sites or facilities specific to each agency's jurisdiction.

EnviroStor

The EnviroStor database, maintained by the DTSC, identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes federal Superfund sites (from the National Priorities List); State response sites, voluntary cleanup sites; school investigation and cleanup sites; corrective action sites; and tiered California permit sites. It also includes sites that are being investigated for

[5] DTSC Envirostor, http://www.envirostor.dtsc.ca.gov/public/.
[6] SWRCB GeoTracker, http://www.geotracker.waterboards.ca.gov/.

suspected but unconfirmed contamination. A search of this database, on February 24, 2015 found no listed facilities within the Specific Plan Area.

GeoTracker

The GeoTracker database, maintained by the SWRCB, lists a range of types of hazardous materials sites that could affect groundwater quality, including leaking underground storage tank (LUST) sites, cleanup program sites, land disposal sites, and military sites. A search of this database on February 24, 2015 for the Specific Plan Area found the facilities listed in Table 4.7-4, and as shown on Figure 4.7-3.

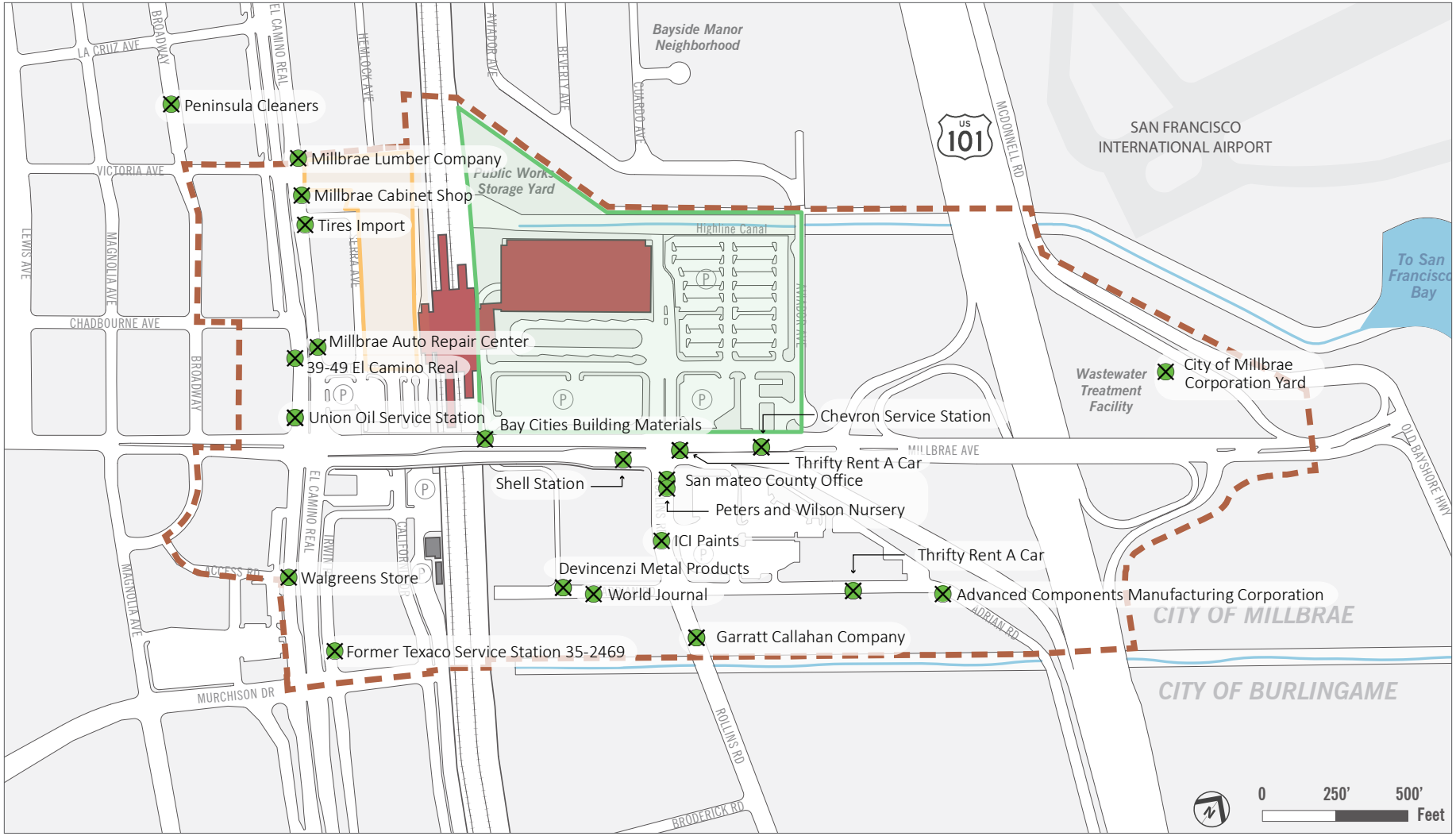
TABLE 4.7-4 CLEANUP SITES IN MILLBRAE STATION AREA[a]

Site No.	Site	Address	Hazardous Material Release	Status
1.	39-49 El Camino Real	39-49 El Camino Real	PCE[b]	Open - Inactive
2.	Bay Cities Building Materials	200 East Millbrae Avenue	Gasoline	Completed - Case Closed
3.	Chevron 9-0206	320 East Millbrae Avenue	Gasoline	Completed - Case Closed
4.	City of Millbrae Corporation Yard	400 East Millbrae Avenue	Gasoline	Completed – Case Closed
5.	Devincenzi Metal Products	230 Adrian	Gasoline	Completed - Case Closed
6.	Garratt Callahan Company	111 Rollins Rd	Gasoline	Completed - Case Closed
7.	Hansen Property (Thrifty Rent a Car)	355 Adrian	Gasoline	Completed - Case Closed
8.	Holiday Cleaners	1883 El Camino Real	PCE, TCE,[c] Vinyl Chloride	Completed - Case Closed
9.	Shell Station	261 Millbrae Ave E	None Specified	Completed - Case Closed
10.	Former Texaco Service Station 35-2469	130 South El Camino Real	Gasoline	Open - Site Assessment
11.	Thrifty Rent-A-Car	309 East Millbrae Avenue	Gasoline	Completed - Case Closed
12.	Unocal Station #3676	5 El Camino Real	Gasoline	Open - Site Assessment
13.	Unocal Station #3798	1876 El Camino Real	Gasoline	Open - Site Assessment

a. See Figure 4.7-3 for Site locations
b. PCE = Tetrachloroethylene
c. TCE = Trichloroethylene
Source: DTSC Envirostor; SWRCB GeoTracker.

San Mateo County Business Inventory List

The County of San Mateo maintains a Business Inventory (BI) list of businesses that have filed a Hazardous Materials Business Plan (HMBP), generate hazardous waste, or maintain underground storage tanks. A review of the San Mateo BI list, as provided by EDR, dated July 2, 2013, and documented in Cornerstone Earth Group's Phase I Environmental Site Assessment report (see Appendix E of this Draft EIR), revealed that there are 19 San Mateo County BI sites within the Specific Plan Area. These sites are listed in Table 4.7-5 and their locations are shown on Figure 4.7-3.



- Specific Plan Area Boundary
- Millbrae BART/Caltrain Station & Parking Structure
- Railroad
- TOD #1 Boundary
- TOD #2 Boundary
- Hazardous Materials Site

Figure 4.7-3
Hazardous Materials Sites

TABLE 4.7-5 SITES USING AND STORING HAZARDOUS MATERIALS IN MILLBRAE STATION AREA[a]

Site No.	Site	Address	Hazardous Material Used/ Stored/Generated
3.	Chevron Service Station	320 Millbrae Avenue	Gasoline
5.	Devincenzi Metal Products	230 Adrian	Gasoline
6.	Garratt Callahan Company	111 Rollins Rd	Gasoline
7.	Thrifty Rent A Car	355 Adrian Road	Gasoline
8.	Holiday Cleaners	1883 El Camino Real	PCE, TCE, Vinyl Chloride
11.	Thrifty Rent A Car	309 East Millbrae Avenue	Gasoline
12.	Union Oil Service Station	5 El Camino Real	Gasoline
13.	Burlington 76 Service Station	1876 El Camino Real	Gasoline
14.	San Mateo County Office	1 Rollins Road	Gasoline
15.	Millbrae Auto Repair Center	120 El Camino Real	Waste Oil/Solvent
16.	Walgreens Store	45 El Camino Real	Motor Vehicle Fuels
17.	Tires Import	184 El Camino Real	Waste Oil/Solvent
18.	Millbrae Cabinet Shop	190 El Camino Real	None Specified (Less than 27 gallon/year)
19.	Millbrae Lumber Company	200 El Camino Real	Motor Vehicle Fuels
20.	Advanced Components Manufacturing Corporation	375 Adrian Road	None Specified
21.	Peninsula Cleaners	243 Broadway	Waste Oil/Solvent
22.	Peters and Wilson Nursery	11 Rollins Road	Motor Vehicle Fuels
23.	ICI Paints	20 Rollins Road	None Specified
24.	World Journal	231 Adrian Road	Conditionally Exempt-Special Wastes

Notes:
a. See Figure 4.7-3 for Site locations
Source: San Mateo County Business Inventory (BI) List, as provided by EDR, and dated July 2, 2013.

TOD #1 Project Site

The TOD #1 project site is located immediately west of the Millbrae Station, east of Serra Avenue and El Camino Real, and north of Linden Avenue. This site is occupied by Millbrae Lumberyard and the Millbrae Serra Convalescent Home. The two ATC Associates, Inc.'s Phase I Environmental Site Assessments (see Appendix E of this Draft EIR) document previous on-site uses and the potential for related environmental contamination for most of the area making up the TOD #1 project site. The following information has been extracted from these reports.

The Millbrae Lumber Company (200 El Camino Real) and Millbrae Serra Convalescent Hospital's original building (150 Serra Avenue) were constructed during 1940-1960. A 500-gallon steel UST formerly containing gasoline was removed from the 200 El Camino Real property on August 18, 1994. Soil sampling was conducted by Tank Protect Engineering, Inc. immediately after the removal if the UST. No gasoline or BTEX constituents were detected in soil samples. According to a letter dated August 25, 1994, the UST removal was confirmed by the San Mateo County Environmental Health Division (SMCEHD). No formal closure information was available for the UST. Based on the age of property buildings (1940-1988), ACM is likely to be present. Based on the age of the property buildings (1940-1988), LBP is likely to be present.

TOD #2 Project Site

The TOD #2 project site is located immediately east of the Millbrae Station, south of the Highline Canal, west of Aviador Avenue, and north of Millbrae Avenue. This site mainly consists of a BART/Caltrain parking garage, surface parking lots, and a City storage yard. The Cornerstone Earth Group's Phase I Environmental Site Assessment (see Appendix E of this Draft EIR) documents previous site uses and the potential for related environmental contamination for most of the area making up the TOD #2 project site. The following information has been extracted from this report.

In approximately 1919, the TOD #2 project site was developed by West Coast Porcelain Manufacturers (WCPM), which produced plumbing fixtures (e.g. sinks and toilets) and other porcelain products. The initial WCPM facilities were located on the western portion of the TOD #2 project site and the facility was later expanded to the east. A fire appears to have destroyed the westernmost WCPM structures in 1939. Royal Container Company subsequently occupied the remaining structures for manufacturing of corrugated cardboard boxes from 1940 to approximately 1962.

By 1946, a concrete mixing batch plant was located on the western portion of the TOD #2 project site; Bay Cities Building Materials Company (BCBM) purchased the plant in the late 1950. The BCBM facility was demolished in 1995 and Hertz acquired the BCBM parcel in 1996 for use as an additional parking lot for its adjacent rental car facility. Hertz or affiliated entities occupied on-site parcels to the east of BCBM since approximately 1969, following demolition of the Royal Container Company structures. Hertz used the property for car rental operations including administrative offices and vehicle maintenance, storage and fueling. The parcels located on the northeast portion of the TOD #2 project site within addresses along Aviador Avenue and Garden Lane were first developed in 1962 with apartment buildings. These buildings were demolished in 1999.

The WCPM operated several fuel oil tanks and multiple oil-fueled kilns. Royal Container Company also operated several fuel oil tanks, along with a boiler house, a machine shop and an incinerator. The fuel oil tanks operated by WCPM and Royal Container Company are shown on historic Sanborn fire insurance maps and appear to have been ASTs.

Hertz conducted vehicle maintenance activities on-site that involved the use and storage of automotive related hazardous materials (e.g. lubricants, fuels, antifreeze, paint related product, cleaning compounds, etc.). In 1974, Hertz installed a fuel island on-site that contained three USTs containing gasoline and diesel). A waste oil UST also was installed, but the date of installation is unknown. These four USTs were removed by Hertz in May 1989. To replace the removed USTs, in 1989 Hertz installed two new USTs (storing gasoline and diesel) and a new waste oil

UST. These replacement USTs were installed near the USTs removed in 1989, but not within the same excavations. These three USTs were removed by BART in 1999. In 1993, Hertz removed 22 hydraulic lifts from vehicle service bays in Hertz Buildings. In 1999, an approximately 55-gallon UST was encountered during grading activities and removed. The BCBM concrete mixing batch plant utilized two 3,000-gallon USTs, one containing gasoline located on the south side of the parcel, and one containing diesel on the north side. BCBM removed the two USTs in 1994.

Numerous environmental studies have been completed at the TOD #2 project site between approximately 1989 and 2001 to evaluate soil and ground water quality. These studies indicate that past TOD #2 project site uses have impacted soil and ground water. The predominant contaminants of concern (COC) that have been identified are lead (in soil) and petroleum hydrocarbons, primarily diesel and oil range petroleum hydrocarbons (in soil and ground water). These COC have been detected in soil and/or ground water samples collected from the TOD #2 project site at concentrations that exceed residential and commercial environmental screening criteria.

Based on prior studies, fill extends from the ground surface to approximate depth between 3 and 4 feet. The fill reportedly consists of compacted gravelly sand or silt with gravel and locally contains debris (e.g. bricks, asphalt, wood, concrete, cinders, porcelain fragments, etc.). Some of the fill has been identified to contain elevated concentrations of lead exceeding residential and commercial environmental screening criteria.

During utility trench excavation across the Site in 1999 and 2000, BART stockpiled and tested soil to evaluate disposal options. Approximately 1,100 tons of soil classified as California hazardous waste (due to elevated concentrations of lead) were disposed at the Kettleman Hills Class 1 landfill located in Kettleman City, California. It is anticipated that similar soil conditions will be encountered during earthwork associated with the proposed TOD #2 project.

Historically, some hydraulic oils contained PCBs. During removal of the 22 hydraulic vehicle lifts at the TOD #2 project site in 1993, most of the collected soil and ground water samples were not analyzed for PCBs; however, PCBs were reported in a composite sample of hoist excavation water and in one of two waste hydraulic soil samples. These results suggest that PCBs may have been present in hydraulic oil used at the TOD #2 project site. Hydraulic oil was detected in soil samples collected from the lift excavations; this oil-impacted soil appears to remain on-site.

In general, the prior soil and groundwater studies and UST removal activities appear to have been conducted under SMCEHD oversight. On March 13, 1996, County Health issues a case letter for the UST removals at the BCBM parcel, stating that based upon the available information, including the current land use, no further action was required.

Similar case closure letters were issued by County Health (March 18, 1996) and the Water Board (May 22, 1996) pertaining to investigation and remediation of lead impacted debris at the BCBM parcel. Prior to issuance of these letters, certain identified areas of lead impacted soil/debris were removed from the BCBM parcel. However, subsequent sampling soil stockpiles generated during utility installation by BART identified elevated lead concentrations. Two of three soil stockpiles generated on the BCBM parcel were classified as hazardous waste for disposal purposes. These findings suggest that lead impacted soil on the BCBM parcel was not fully mitigated during previous remedial activities. Similarly, elevated lead concentrations have been detected in soil samples collected from other portions of the TOD #2 project site during prior soil characterization studies.

On July 29, 2001, SMCEHD used a case closure letter for the 1999 UST removals at the Hertz facility, stating that no further action related to the petroleum release(s) at the TOD #2 project site is required. In an associated case closure summary, SMCEHD stated the following:

> *"City of Millbrae Building Department has been sent a letter stating that should excavation or development of the property be proposed, the San Mateo County Environmental Health Division will be notified to ensure proper disposal or handling of contaminates oils. Approximately 8,100 cubic yards of soil containing TPH greater than 100 mg/kg exist at the site. Should any change in use of the property or development of the subject site occur which may impact these soils or groundwater, City Building Departments must notify the Environmental Health Division for approval pursuant to Government Code Section 65850.2.2."*

Future redevelopment on the TOD #2 project site will include a mixed commercial and residential development with at least one below grade parking structure. Cornerstone concluded that mitigation measures appear required to manage impacted soil and groundwater during redevelopment activities to limit potential risks to future occupants and/or construction workers on the TOD #2 project site.

Existing or Proposed Schools

There are no public or private schools located within the Specific Plan Area. The nearest existing school to the Specific Plan Area is Mills High School located at 400 Murchison Drive. The school's main building is located roughly 0.15 mile to the southwest of the nearest Specific Plan Area border, beyond Magnolia Avenue; however the sports fields are located about 0.07 feet away. All other existing schools are located more than 0.25-mile distance from the Specific Plan Area. There are no new schools proposed within the Specific Plan Area or near vicinity.

Airport Hazards

The Specific Plan Area is located across Highway 101 from SFO. The intersection of Millbrae Avenue and Rollins Road, which is near the center of the Specific Plan Area, is approximately 1,600 feet southwest of the southernmost portion of the airport tarmac. Over 385,000 aircraft takeoffs or landings occurred at SFO in 2010, consisting of air carriers, regional jets, general aviation propeller aircraft, commuter propeller aircraft, business jets, fixed-wing military aircraft, and both civilian and military helicopters.[7]

As shown on Figure 4.7-1, above, the Specific Plan Area is within Safety Compatibility Zones 1, 2, and 3, which limits the types of development that can occur in the Specific Plan Area to prevent hazards to users of the site. As shown on Figure 4.7-2 above, the Specific Plan Area is also in the area where heights of structures are limited under FAA regulations to avoid hazards to air navigation.

There are no private airstrips or heliports near the Specific Plan Area.[8]

[7] City/County Association of Governments of San Mateo County, 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, Table 11-7, p. 11-31.

[8] Airnav.com. 2014. Airport Information. http://www.airnav.com/airports/, accessed December 1, 2014.

Wildland Fire Hazard

There are no wildlands located within or adjacent to the Specific Plan Area. CAL FIRE evaluates fire hazard severity risks according to areas of responsibility (i.e. federal, state, and local). According to CAL FIRE,[9] there are no very high fire hazard severity zones (VHFHSZ) within the Local Responsibility Area on or in near proximity to the Specific Plan Area. Likewise, the Specific Plan Area is not within a wildland State Responsibility Area.[10]

4.7.2 STANDARDS OF SIGNIFICANCE

The proposed Project would have a significant impact regarding hazards and hazardous materials if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school.
4. 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 the environment.
5. Be 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, result in a safety hazard for people residing or working in the Specific Plan Area.
6. Be within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the Specific Plan Area.
7. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
8. 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.

With regard to Standards of Significance 6 and 8, as previously discussed in Section 4.7.1.2, Existing Conditions, there are no private airstrips or heliports listed by FAA within or in proximity to the Specific Plan Area, and there are no wildlands or areas with a VHFHSZ designation located within or adjacent to the Specific Plan Area. Therefore, no further discussion of the proposed Project's impacts related to airport safety operations and to people residing or living in the Specific Plan Area in close proximity to private airstrips or wildlands is warranted in this Draft EIR.

[9] California Department of Forestry and Fire Protection, 2008. San Mateo County Very High Fire Hazard Severity in LRA map, accessed December 2, 2014.

[10] California Department of Forestry and Fire Protection, 2007. *Fire Hazards and Severity Zones in State Responsibility Areas,* http://frap.cdf.ca.gov/webdata/maps/sanmatero/fhszs_map.43.pdf, accessed December 2, 2014.

4.7.3 IMPACT DISCUSSION

HAZ-1	The proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Specific Plan Update

Future development in the Specific Plan Area could result in the use and storage of hazardous materials, including common cleaning products, building maintenance products, paints and solvents, and other similar items. These potentially hazardous materials, however, would not be of the type or occur in sufficient quantities to pose a significant hazard to public health and safety or to the environment. Several properties within the Specific Plan Area have residual soil, and in some cases groundwater, contamination that may require remediation. Also, potentially hazardous building materials (e.g. asbestos containing materials, lead-based paint, etc.) could be encountered during demolition of existing structures to accommodate new development. Therefore, the transport of hazardous materials could occur during future remediation and construction activities. Transport of hazardous materials, however, would be subject to existing federal, State, and local regulations, such as the following:

- DOT Hazardous Materials Transport Act-Code of Federal Regulations (CFR) 49
- US EPA Resource Conservation and Recovery Act (RCRA)
- US EPA Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- Toxic Substance Control Act
- CAL/OSHA
- California Health and Safety Code (Chapters 6.95 and 19)
- California Code of Regulations (Section 2729)

Compliance with these laws and regulations would ensure hazardous impacts associated with the routine transport, use, or disposal of hazardous materials are *less than significant*.

Significance Without Mitigation: Less than significant.

TOD #1 Project

Project Operation

The proposed TOD #1 project, a mixed-use development, would not include the routine transport or disposing of hazardous materials. The operation of the TOD #1 project could result in the use and storage of hazardous materials, including common cleaning products, building maintenance products, paints and solvents, and other similar items. These potentially hazardous materials, however, would not be of the type or occur in sufficient quantities to pose a significant hazard to public health and safety or to the environment. Compliance with the laws and regulations listed in HAZ-1 in the Specific Plan Update discussion would minimize hazards associated with the routine transport, use, or disposal of hazardous materials to *less than significant*.

Project Construction

Construction activities at the TOD #1 project site would involve the use of larger amounts of hazardous materials than would the operation of the TOD #1 project, such as operation petroleum-based fuels for maintenance and construction equipment, and coatings used in construction, which would be transported to the site periodically by vehicle and would be present temporarily during construction. These potentially hazardous materials, however, would not be of a type or occur in sufficient quantities on-site to pose a significant hazard to public health and safety or the environment, and would also be short-term. Also, potentially hazardous building materials (e.g. asbestos containing materials, lead-based paint, etc.) could be encountered during demolition of existing structures to accommodate new development. Additionally, as with the proposed project operation, the use, transport, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Consequently, associated impacts from construction of the proposed TOD #1 project would be *less than significant*.

Significance Without Mitigation: Less than significant.

TOD #2 Project

The discussion above under TOD #1 is applicable to the TOD #2 project's operation and construction.

Significance Without Mitigation: Less than significant.

HAZ-2	The proposed Project would not 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.

Specific Plan Update

It is envisioned that the Specific Plan Area would be developed with a mix of residential, office, hotel, and retail uses. Operation of the future projects would involve the storage and use of common cleaning substances, building maintenance products, paints, and solvents. These potentially hazardous substances would not, however, be of a type or occur in sufficient quantities in the Specific Plan Area to pose a significant hazard to public health and safety or the environment. The storage and use of these materials would be subject to existing federal, State, and local regulations, such as the following, which are discussed further in Section 4.7.1.1, Regulatory Framework:

- US EPA laws and regulations ensure the safe production, handling, disposal, and transportation of hazardous materials. Laws and regulations established by the US EPA are enforced locally by California Environmental Protection Agency (CalEPA).
- As described above, OSHA oversees training for hazardous materials handlers and the provision of information to employees who may be exposed to hazardous materials.

- California Health and Safety Code Chapters 6.95 and 19, and California Code of Regulations Section 2729, set out the minimum requirements for business emergency plans. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on site. A business that uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities.
- The California Division of Occupational Safety and Health Administration (Cal OSHA) is the responsible State-level agency for ensuring workplace safety. Cal OSHA assumes primary responsibility for the adoption and enforcement of standards regarding workplace safety and safety practices.
- The California Emergency Management Agency (CalEMA) is responsible for the coordination of overall State agency response to major disasters in support of local government. The agency is responsible for assuring the State's readiness to respond to and recover from all hazards and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.
- The San Mateo County Environmental Health Department (SMCEHD) is the Department of Toxic Substances Control (DTSC) Certified Unified Program Agency (CUPA) charged with implementing and enforcing State and local policies relating to hazardous materials in San Mateo County. This includes administration of the Hazardous Materials Business Plan Program and California Accidental Release Program.

Compliance with these regulations would ensure that the risk of accidents and spills are minimized to the maximum extent practicable. Consequently, overall, associated impacts would be *less than significant*.

Significance Without Mitigation: Less than significant.

TOD #1 Project

Project Operation

The proposed TOD #1 project, a mixed-use development, is not considered the type of project that would create a hazardous materials threat to the users of the site or the surrounding land uses. Compliance with the regulations listed in HAZ-2 under the Specific Plan Update discussion would ensure that the risk of accidents and spills is minimized to the maximum extent practicable during the operation of the proposed TOD #1 project. Consequently, associated impacts would be *less than significant*.

Project Construction

The type of construction materials and equipment would be considered standard for this type of development. All spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

Furthermore, strict adherence to all emergency response plan requirements set forth by SMCEHD would be required through the duration of the construction the project. Therefore, substantial hazards to the public or the

environment arising from the routine use of hazardous materials during the proposed TOD #1 project construction would not occur, and impacts would *be less than significant*.

Prior to the construction of the proposed TOD #1 project, the existing buildings on-site, which likely contain ACMs and LBP as they were all built by 1968, would be demolished. During the demolition phase of the proposed Project, potentially hazardous building materials (i.e. ACMs, LBPs, PCBs, mercury, household wastes) may be encountered. Removal of these types of hazardous materials (if present) by contractors licensed to remove and handle these materials in accordance with existing federal, State, and local regulations would insure that risks associates with the transport, storage, use, and disposal of such materials would be reduced to the maximum extent practical. Consequently, associated impacts from demolition phase of the proposed TOD #1 project would be *less than significant*.

Significance Without Mitigation: Less than significant.

TOD #2 Project

The discussion above under the TOD #1 project is applicable to the TOD #2 project with the exception of potential hazards associated with buildings constructed prior to 1968 as the site contains no such structures.

Significance Without Mitigation: Less than significant.

HAZ-3	The proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school.

Specific Plan Update

The nearest existing school to the Specific Plan Area is Mills High School located roughly 0.07 to 0.15 mile southwest of the nearest Specific Plan Area border; therefore, future development on the southwest area of the Specific Plan could impact this school. The SMCEHD and the City of Millbrae Building Division coordinate the review of building permits to ensure that hazardous materials use requirements are met prior to construction, including required separation between hazardous materials and sensitive land uses, and proper hazardous materials storage facilities. In addition, the future development under the Specific Plan Update could use hazardous materials during construction and operation. Future development under the Specific Plan Update would be required by the SMCEHD to store, manage, and dispose of the materials in accordance with the Unified Program.

As addressed in the discussion of HAZ-1, construction of future development allowed by the proposed Specific Plan Update could involve the routine transport, use, and disposal of hazardous or potentially hazardous materials to, from, and on development sites. As stated in the discussion of HAZ-2, the proposed Specific Plan Update calls for a range of uses that would not involve the storage or handling of large quantities of hazardous materials. The amount of hazardous chemicals and materials that would be involved in the implementation of the proposed Specific Plan Update would be subject to existing government regulations. As stated in the discussions of Impacts HAZ-1 and HAZ-2, compliance with existing federal, State, and local regulations, procedures, and policies would avoid potential impacts associated with hazardous materials handling, use, and storage in the Specific Plan Area.

Compliance with these regulations, procedures, and policies would ensure that hazardous materials are properly handled, thereby reducing potential risks to nearby schools. Therefore, potential impacts to schools would be *less than significant*.

Significance Without Mitigation: Less than significant.

TOD #1 Project

Project Operation

The nearest existing school to the TOD #1 project site is Mills High School located roughly 0.21 mile (sports fields) to 0.35 mile (school building) to the southwest of the project site. The SMCEHD and the City of Millbrae Building Division coordinate the review of building permits to ensure that hazardous materials use requirements are met prior to construction, including required separation between hazardous materials and sensitive land uses, and proper hazardous materials storage facilities. The TOD #1 project would be required by the SMCEHD to store, manage, and dispose of the materials in accordance with the Unified Program.

Project Construction

As addressed in the discussion of HAZ-1, construction the TOD #1 project could involve the routine transport, use, and disposal of hazardous or potentially hazardous materials to, from, and on the site. As stated in the discussion of HAZ-2, the proposed TOD #1, a mixed-use development, is not considered the type of project that would create a hazardous materials threat to the users of the site or the surrounding land uses. The amount of hazardous chemicals and materials that would be involved in the construction of the proposed TOD #1 project would be subject to existing government regulations. As stated in the discussions of HAZ-1 and HAZ-2, compliance with existing federal, State, and local regulations, procedures, and policies would avoid potential impacts associated with hazardous materials handling, use, and storage on the TOD #1 project site. Compliance with these regulations, procedures, and policies would ensure that hazardous materials are properly handled, thereby reducing potential risks to nearby schools. Therefore, potential impacts to schools would be *less than significant*.

Significance Without Mitigation: Less than significant.

TOD #2 Project

There are no schools or associated school facilities within 0.25 mile of the TOD #2 project site, and *no impact* would occur. Regardless, as discussed in the TOD #1 impact discussion above, compliance with mandatory regulation would ensure impacts would be *less than significant*.

Significance Without Mitigation: No impact.

HAZ-4	The proposed Project would 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 the environment.

Specific Plan Update

As discussed previously, there are properties within the Specific Plan Area that are known to have contaminated groundwater and soils. Substances identified on these properties include VOCs, petroleum and gasoline, various metals, PBCs, and other chemicals. For many of these properties, soil and water sampling have been performed through the form of a Remedial Action Plan, Hazard Mitigation Plan, Phase II Report, Soils or Groundwater Monitoring Report, or other type of contaminant testing and disclosure documentation. Many of these documents contain recommendations or mitigations associated with remediation of properties, as well as appropriate pollutant thresholds that would need to be achieved prior to development after appropriate property remediation has occurred. It should be noted that soils, groundwater, and/or property decontamination and remediation are currently being managed for each individual property with residual contamination in accordance with applicable Federal, State (including RWQCB and DTSC), and local (SMCEHD) procedures, protocols, and standards. The Plan incorporates properties owned by multiple property owners, and as such, properties within the Specific Plan Area with any residual contamination would be remediated and developed on a case-by-case basis with regulatory oversight. While compliance with applicable Federal, State, and local standards, including General Plan Policy SIP-15, which requires sites contaminated with hazardous materials to be cleaned up, the redevelopment of these future sites where hazardous materials are unknown could create a *significant* impacts to future occupants of the Specific Plan Area and/or construction workers.

Impact HAZ-SP-4: Implementation of the Specific Plan Update would occur 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 the environment.

Mitigation Measure HAZ-SP-4a: Prior to the issuance of a building permit for an individual property within the Specific Plan Area with residual environmental contamination, the agency with primary regulatory oversight of environmental conditions at such property ("Oversight Agency") shall have determined that the proposed land use for that property, including proposed development features and design, does not present an unacceptable risk to human health, if applicable, through the use of an Environmental Site Management Plan (ESMP) that could include institutional controls, site-specific mitigation measures, a risk management plan, and deed restrictions based upon applicable risk-based cleanup standards. Remedial action plans, risk management plans and health and safety plans shall be required as determined by the Oversight Agency for a given property under applicable environmental laws, if not already completed, to prevent an unacceptable risk to human health, including workers during and after construction, from exposure to residual contamination in soil and groundwater in connection with remediation and site development activities and the proposed land use.

Mitigation Measure HAZ-SP-4b: For those sites with potential residual volatile organic compounds (VOCs) in soil, soil gas, or groundwater that are planned for redevelopment with an overlying occupied building, a vapor intrusion assessment shall be performed by a licensed environmental professional. If the results of the vapor intrusion assessment indicate the potential for significant vapor intrusion into the proposed building,

the project design shall include vapor controls or source removal, as appropriate, in accordance with Regional Water Quality Control Board (RWQCB), the Department of Toxic Substances Control (DTSC) or the San Mateo County Environmental Health Divisions (SMCEHD) requirements. Soil vapor mitigations or controls could include passive venting and/or active venting. The vapor intrusion assessment as associated vapor controls or source removal can be incorporated into the ESMP (Mitigation Measure HAZ4-SP-4a).

Mitigation Measure HAZ-SP-4c: Prior to the import of a soil to a particular property within the Specific Plan Area as part of that property's site development, such soils shall be sampled for toxic or hazardous materials exceeding applicable Environmental Screening Levels for the proposed land use at such a property in accordance with Regional Water Quality Control Board (RWQCB), the Department of Toxic Substances Control (DTSC) or the San Mateo County Environmental Health Divisions (SMCEHD) requirements prior to importing to such a property.

Significance With Mitigation: Less than significant.

TOD #1 Project

There are no listed hazardous materials sites within the TOD #1 project site; thus *no impact* would occur.

Significance Without Mitigation: No impact.

TOD #2 Project

As previously discussed, numerous environmental studies have been completed at the TOD #2 project site between approximately 1989 and 2001 to evaluate soil and ground water quality. These studies indicate that past site uses have impacted soil and ground water. The predominant contaminants of concern (COC) that have been identified are lead (in soil) and petroleum hydrocarbons, primarily diesel and oil range petroleum hydrocarbons (in soil and ground water). These COCs have been detected in soil and/or ground water samples collected from the Site at concentrations that exceed residential and commercial environmental screening criteria.

Based on prior studies, fill extends from the ground surface to approximate depth between 3 and 4 feet. The fill reportedly consists of compacted gravelly sand or silt with gravel and locally contains debris (e.g. bricks, asphalt, wood, concrete, cinders, porcelain fragments, etc.) Some of the fill has been identified to contain elevated concentrations of lead exceeding residential and commercial environmental screening criteria.

Historically, some hydraulic oils contained PCBs. During removal of the 22 hydraulic vehicle lifts at the project site in 1993, most of the collected soil and ground water samples were not analyzed for PCBs, however, PCBs were reported in a composite sample of hoist excavation water and in one of two waste hydraulic soil samples. These results suggest that PCBs may have been present in hydraulic oil used at the Site. Hydraulic oil was detected in soil samples collected from the lift excavations; this oil-impacted soil appears to remain on-Site. Future redevelopment on the TOD #2 project site will include a mixed commercial and residential development with at least one below grade parking structure. Mitigation measures appear required to manage impacted soil and groundwater during redevelopment activities to limit potential risks to future occupants and/or construction workers at the TOD #2 project site.

On July 29, 2001, SMCEHD used a case closure letter for the 1999 UST removals at the Hertz facility, stating that no further action related to the petroleum release(s) at the site is required. In an associated case closure summary, SMCEHD stated the following:

> *"City of Millbrae Building Department has been sent a letter stating that should excavation or development of the property be proposed, the San Mateo County Environmental Health Division will be notified to ensure proper disposal or handling of contaminates oils. Approximately 8,100 cubic yards of soil containing TPH greater than 100 mg/kg exist at the site. Should any change in use of the property or development of the subject site occur which may impact these soils or groundwater, City Building Departments must notify the Environmental Health Division for approval pursuant to Government Code Section 65850.2.2."*

Impact HAZ-TOD#2-4: Future redevelopment of the TOD #2 project site would include a mixed commercial and residential development where contaminate soil and groundwater could pose a *significant* hazard to the public or the environment during redevelopment activities.

Mitigation Measure HAZ-TOD#2-4a: Prior to the issuance of a building permit, the agency with primary regulatory oversight of environmental conditions at the project site ("Oversight Agency") shall have determined that the proposed land use for that property, including proposed development features and design, does not present an unacceptable risk to human health, if applicable, through the use of an Environmental Site Management Plan (ESMP) that could include institutional controls, site-specific mitigation measures, a risk management plan, and deed restrictions based upon applicable risk-based cleanup standards. Remedial action plans, risk management plans and health and safety plans shall be required as determined by the Oversight Agency for a given property under applicable environmental laws, if not already completed, to prevent an unacceptable risk to human health, including workers during and after construction, from exposure to residual contamination in soil and groundwater in connection with remediation and site development activities and the proposed land use.

Mitigation Measure HAZ-TOD#2-4b: Prior to the construction of the proposed TOD #2 project, the Project Applicant shall prepare a vapor intrusion assessment by a licensed environmental professional. If the results of the vapor intrusion assessment indicate the potential for significant vapor intrusion into the proposed building, the project design shall include vapor controls or source removal, as appropriate, in accordance with Regional Water Quality Control Board (RWQCB), the Department of Toxic Substances Control (DTSC) or the San Mateo County Environmental Health Divisions (SMCEHD) requirements. Appropriate soil vapor mitigations or controls could include vapor barriers, passive venting, and/or active venting. The vapor intrusion assessment as associated vapor controls or source removal can be incorporated into the ESMP (Mitigation Measure HAZ-TOD#2-1a).

Mitigation Measure HAZ-TOD#2-4c: Prior to the import of a soil, the Project Applicant shall prepare a soil inspection where such soils shall be sampled for toxic or hazardous materials exceeding applicable Environmental Screening Levels by a licensed environmental professional during the construction phase. If contaminated soils are encountered, such soils shall be handled and disposed of in accordance with Regional Water Quality Control Board (RWQCB), the Department of Toxic Substances Control (DTSC) or the San Mateo County Environmental Health Divisions (SMCEHD) requirements.

Significance With Mitigation: Less than significant.

HAZ-5	The proposed Project would not be 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, result in a safety hazard for people residing or working in the Specific Plan Area.

Specific Plan Update

As discussed in Section 4.7.1.1, Existing Conditions, the ALUCP was adopted by the C/CAG in 2012 and addresses issues related to compatibility between airport operations and surrounding proposed land use development, considering safety of persons on the ground and in flight, height restrictions/airspace protection, and overflight notification. The Specific Plan Area is within areas of the ALUCP that limits land use and building height to minimize hazardous impacts to people residing or working in the Specific Plan Area.

Building Height

The Specific Plan Area is within the building height restricted areas designed to prevent potential safety hazards that could be caused by the construction of tall structures compromising the airspace in the SFO vicinity. The maximum building height of 110 feet average MSL proposed under the Specific Plan Update would not exceed the SFO ALUCP's building height limits of 50 to 175 feet above average MSL. Regardless, future development under the Specific Plan Update would be required to be consistent with SFO ALUCP Policy AP-3, which establishes the procedures for determining the maximum compatible building height. As stated in Policy AP-3, in order to be deemed consistent with the SFO ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surface map (see Figure 4.7-2), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1. The sponsor of the proposed project is subject to the requirements of federal and state law and those requirements effectively prohibit the construction of any structure determined by the FAA to be a hazard to air navigation.[11] In addition, future projects under the Specific Plan Update would be required to comply with Millbrae Municipal Code Chapter 9.55 Buildings Hazardous to Air Navigation, which requires compliance with FAA regulations to ensure structures do not represent a hazard to air navigation. Therefore, compliance with SFO ALUCP Policy AP-3 and Millbrae Municipal Code Chapter 9.55 would ensure the proposed building heights would not create a hazard to air navigation and impacts would be *less than significant*; thus, no mitigation measures are required.

Aviation-Related Hazards

The Specific Plan Area is located within the ALCUP's Safety Compatibility Zones 1, 2, and 3 that limits the types of development that can occur in the Specific Plan Area to prevent hazards to users of the Specific Plan Area. Future development under the Specific Plan Update would occur within Zone 2 and Zone 3 and as shown in Table 4.7-2, the types of mixed-use development projects proposed under the Specific Plan Update are not considered incompatible land use for these zones. The proposed Specific Plan Update would not subject people or structures to substantial airport related hazards, and impacts would be *less than significant*.

[11] City/County Association of Governments of San Mateo County, 2012. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*, page III-22.

Significance Without Mitigation: Less than significant.

TOD #1 Project

The discussion above under Specific Plan Update is applicable to the proposed TOD #1 project. As described in Chapter 3, Project Description, the maximum building height proposed under the TOD #1 project is 136 feet. As described under the Specific Plan Update discussion above, the project applicant would be would be required to be consistent with SFO ALUCP Policy AP-3 and Millbrae Municipal Code Chapter 9.55, which require project applicants to be subject to the requirements of federal and state law that effectively prohibit the construction of any structure determined by the FAA to be a hazard to air navigation.[12] Therefore, compliance with SFO ALUCP Policy AP-3 and Millbrae Municipal Code Chapter 9.55 would ensure the proposed building heights would not create a hazard to air navigation and impacts would be *less than significant*; thus, no mitigation measures are required.

Significance Without Mitigation: Less than significant.

TOD #2 Project

The discussion above under Specific Plan Update is applicable to the proposed TOD #2 project. As described in Chapter 3, Project Description, the maximum building height proposed under the TOD #1 project is 110 feet. As described under the Specific Plan Update discussion above, the project applicant would be would be required to be consistent with SFO ALUCP Policy AP-3 and Millbrae Municipal Code Chapter 9.55, which require project applicants to be subject to the requirements of federal and state law that effectively prohibit the construction of any structure determined by the FAA to be a hazard to air navigation.[13] Therefore, compliance with SFO ALUCP Policy AP-3 and Millbrae Municipal Code Chapter 9.55 would ensure the proposed building heights would not create a hazard to air navigation and impacts would be *less than significant*; thus, no mitigation measures are required.

Significance Without Mitigation: Less than significant.

HAZ-6	The proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Specific Plan Update

As discussed in Section 4.7.1.1, Regulatory Framework, the City has adopted ABAG's multi-jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area, as modified for the City's Local Hazard Mitigation. Buildout of the Specific Plan Area will result in changes to current circulation through the Specific Plan Area for emergency vehicles, cars, buses, bicycles, and pedestrians; however, no physical components that would interfere

[12] City/County Association of Governments of San Mateo County, 2012. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*, page III-22.

[13] City/County Association of Governments of San Mateo County, 2012. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*, page III-22.

with the ability to implement emergency response are proposed. Project plans include fire and emergency access through all phases of construction and operation. Compliance with the provisions of the California Fire Code and the California Building Code would ensure that buildout of the Project would result in a *less-than-significant* impact with respect to interference with an adopted emergency response plan or emergency evacuation plan.

Significance Without Mitigation: Less than significant.

TOD #1 Project

Project Operation

The TOD #1 project would reduce the width of internal roadways to enhance the pedestrian environment, and provide a block grid with 200-foot blocks. On El Camino Real, where mid-block crossing would be more difficult, the TOD #1 project proposes a signal at Millbrae Avenue that would control the light so that a free right turn exists until a pedestrian triggers the signal. The TOD #1 project proposes automatically-activated crosswalk signals at high pedestrian traffic areas.

As discussed in Section 4.7.1.1, Regulatory Framework, the City has adopted ABAG's multi-jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area, as modified for the City's Local Hazard Mitigation. Buildout of the Specific Plan Area will result in changes to current circulation through the Specific Plan Area for emergency vehicles, cars, buses, bicycles, and pedestrians; however, no physical components that would interfere with the ability to implement emergency response are proposed. Project plans include fire and emergency access through all phases of construction and operation. Compliance with the provisions of the California Fire Code and the California Building Code would ensure that buildout of the Project would result in a *less-than-significant* impact with respect to interference with an adopted emergency response plan or emergency evacuation plan.

Project Construction

All construction staging and parking would occur on-site. Impacts would be *less than significant*.

Significance Without Mitigation: Less than significant.

TOD #2 Project

Project Operation

The TOD #2 project would extend Rollins Road to connect to the proposed parking lot. The TOD #2 project would improve Garden Lane that connects Rollins Road and Aviador Avenue. The TOD #2 project would not block roads and would not impede emergency access to surrounding properties or neighborhoods.

As discussed in Section 4.7.1.1, Regulatory Framework, the City has adopted ABAG's multi-jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area, as modified for the City's Local Hazard Mitigation. Buildout of the Specific Plan Area will result in changes to current circulation through the Specific Plan Area for emergency vehicles, cars, buses, bicycles, and pedestrians; however, no physical components that would interfere

with the ability to implement emergency response are proposed. Project plans include fire and emergency access through all phases of construction and operation. Compliance with the provisions of the 2013 California Fire Code and the 2013 California Building Code would ensure that buildout of the Project would result in a *less-than-significant* impact with respect to interference with an adopted emergency response plan or emergency evacuation plan.

Project Construction

All construction staging and parking would occur on-site. Impacts would be *less than significant*.

Significance Without Mitigation: Less than significant.

4.7.4 CUMULATIVE IMPACTS

HAZ-7	The proposed Project, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to hazards and hazardous materials.

The proposed Project would have a significant cumulative impact if it would, in combination with cumulative projects, expose people, structures, or schools to risks or hazards associated with hazardous materials, airport hazards, emergency response and evacuation, or wildland fires.

As discussed in Section 4.7.3, impacts associated with the proposed Project would be less than significant with implementation of Mitigation Measures HAZ-SP-1a through HAZ-SP-1c and HAZ-TOD#1-1a through HAZ-TOD#2-1c because the proposed Project would not create a public or environmental hazard through the routine transport, use, disposal, or accidental release of hazardous materials; emit or handle hazardous materials within proximity of a school; impede emergency response or evacuation; or expose people and structures to wildland fires. In addition, like in the Specific Plan Area, cumulative development sites located within the SFO ALUCP's boundary would be required to comply with the same policies and regulations as the proposed Project. Furthermore, the proposed Project is not near a private airstrip, so there would be no cumulative impact related to airport or airstrip hazards.

Similar to development allowed by the proposed Project, cumulative projects that include residential, commercial, and mixed-use development, and do not include land uses, such as heavy industry, that would involve the storage or handling of large quantities of hazardous materials. In addition, the project is not located in a Very High Fire Hazard Severity Zone.

Like development allowed by the proposed Project, the development of cumulative projects would likely involve the transport and use of hazardous materials, such as chemicals and solvents used for construction activities and routine cleaning and maintenance. Similarly, cumulative development located in proximity to schools and sites tracked by the RWQCB's GeoTracker and US EPA's EnviroMapper databases would be required to comply with the applicable federal, regional, and local standards and requirements that address hazards and hazardous materials impacts same as the proposed Project. These regulations, procedures, and policies promote and require the proper

handling, use, transport, and disposal of hazardous wastes and materials; facilitate implementation of emergency response plans and evacuation routes; and protect development from wildland fires, as described further in Section 4.7.3.

Therefore, the proposed Project's contribution to cumulative impacts associated with hazards and hazardous materials are considered to be *less than significant*.

Significance With Mitigation: Less than significant.

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