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Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
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SENT VIA ELECTRONIC MAIL

August 29, 2024

Alvin Jen
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RE: SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE RAVENSWOOD BUSINESS DISTRICT/FOUR CORNERS SPECIFIC PLAN UPDATE DATED JULY 26, 2024, STATE CLEARINGHOUSE NUMBER [2022040352](#)

Dear Alvin,

The Department of Toxic Substances Control (DTSC) received a Subsequent Environmental Impact Report (SEIR) for the Ravenswood Business District/Four Corners Specific Plan Update (project). The City adopted the existing Ravenswood Specific Plan in 2013. An update to the Specific Plan (Specific Plan Update) is proposed and would increase the total amount of development allowed within the Specific Plan area. The proposed Specific Plan Update would be implemented as one of two development scenarios, both of which are evaluated in the SEIR: Scenario 1 would consist of an additional 2.8 million square feet of office and research and development (R&D) space, 250,000 square feet of industrial space, 129,700 square feet of civic space, 112,400 square feet of retail space, 43,870 square feet of tenant amenity space, and 1,350 residential units.

Scenario 2 would consist of an additional 3.3 million square feet of office and R&D space, 300,000 square feet of industrial space, 129,700 square feet of civic space, 112,400 square feet of retail space, 53,500 square feet of tenant amenity space, and 1,600 residential units. After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. As listed in Table 3.9-1 Summary of Reported On-Site Spill Incidents of the SEIR, [Romic Environmental Technologies Corp](#) (Site) remains an open case. The United States Environmental Protection Agency (USEPA) is the lead agency regulatory agency overseeing the Site's corrective action implementation, while the DTSC is the lead regulatory agency responsible for overseeing the final closure and redevelopment. The San Francisco Regional Water Quality Control Board is providing further regulatory oversight as they are responsible for maintaining groundwater quality in the San Francisco Bay region. Per Table 3.9-1 of the SEIR, the Romic facility was historically used as a hazardous waste management facility. During facility operations, soil, soil vapor, and groundwater were contaminated with chlorinated and aromatic volatile organic compounds. Based on Figures 3.16-4 and 3.16-5, it appears that bike paths and pedestrian improvements will intersect the Site. The Site has a [Land Use Covenant and Agreement](#) (Covenant) that restricts uses of the Site to protect human health, safety and the environment. Additionally, remedial activities at the Site are ongoing for an indefinite period. In order to protect the health of project workers and future workers at the Site, the USEPA and DTSC should be consulted before moving forward with any project activities on or adjacent to the Site boundary.
2. In addition to the Site mentioned in Number 1, the proposed Project encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has conducted oversight that may be impacted as a result of this project. This may restrict what construction activities are permissible in the proposed project areas in order to avoid any impacts to human health and the environment.

3. Due to the broad scope of the project, DTSC is unable to determine the locations of the proposed sites, whether they are listed as having documented contamination, land use restrictions, or whether there is the potential for the sites to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, DTSC recommends providing further information on the proposed project and areas that may fall under DTSC's oversight within future environmental documents. Once received, DTSC may provide additional comments on future environmental documents as further information becomes available. Please review the project area in [EnviroStor](#), DTSC's public-facing database.
4. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).
5. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's PEA Guidance Manual](#).

6. When agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [HHRA NOTE NUMBER 3, DTSC-SLs](#) approved thresholds. If they are not, remedial action must take place to mitigate them below those thresholds.
7. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required.

DTSC believes the City of East Palo Alto must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA. DTSC recommends the department connect with our unit if any hazardous waste projects managed or overseen by DTSC are discovered. Please refer to the [City of East Palo Alto EnviroStor Map](#) for additional information about the areas of potential contamination. If further concerns or impacts surface in light of the any forthcoming environmental documents, DTSC reserves the right to provide applicable comments at that time.

DTSC appreciates the opportunity to comment on the SIER for the Ravenswood Business District/Four Corners Specific Plan Update. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Alvin Jen
August 29, 2024
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Sincerely,

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