

2.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less-than-Significant with Mitigation	Less-than-Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2.9.1 Environmental Setting

Unless otherwise noted, hazardous materials information in this section is based on the *Phase I Initial Site Assessment, San Francisco-Oakland Bay Bridge Bicycle/Pedestrian Connection, Oakland, California* (Phase I ISA) (Fugro 2014). The purpose of the Phase I ISA was to identify potential and recognized environmental concerns (RECs) associated with the past and/or present use, generation, storage, or disposal of hazardous materials and/or wastes in the Project area and at nearby properties.

2.9.1.1 Existing Conditions

Recognized Environmental Concerns

According to the Phase I ISA (Fugro 2014), environmental database searches were conducted via State Water Resources Control Board’s GeoTracker, Department of Toxic Substances Control’s (DTSC’s) EnviroStor, and Environmental Data Resources, Inc., to document hazardous materials handling, storage, or releases in the Project area’s vicinity. Twenty-seven sites were identified during the environmental database search, and two of those sites were identified as RECs having the potential to affect the Project area. They are 1) the former Oakland Army Base (OAB) on the west side of I-880, south of the proposed

Link, and 2) the Heroic War Dead Army Reserve Center¹¹ on the west side of I-880, north of the proposed Link on the EBMUD site at 2400 Engineer Road.

The OAB site was identified in the Department of Defense sites database, DTSC's deed restriction listing (DEED), the CalEPA Hazardous Waste and Substances Sites Cortese List, and the State Water Resources Control Board's Leaking Underground Storage Tank database.

The EBMUD site was identified as part of DTSC's Historical CalSites, DEED, State Response Sites, and EnviroStor database. It was also part of the State Water Resources Control Board's Military Cleanup Sites listing.

Nearby Schools

The nearest school to the Project area is Ralph J. Bunche Continuation High School. It is approximately 0.2 mile southeast of the intersection of Peralta Street and 20th Street (the southeast corner of the proposed Class II bike lane locations).

Nearby Airports

The Project area is not within an airport land use plan area or within 2 miles of a public airport or public use airport. The closest airport is Oakland International Airport, approximately 8.1 miles southeast of the Project area. San Francisco International Airport is approximately 14 miles to the southwest (across the Bay), and Hayward Executive Airport is approximately 14 miles to the southeast. There are no private airstrips in the vicinity of the Project.

Wildfire Risk

According to the "Very High Fire Hazards Severity Zones in LRA – Alameda County" map from the Fire and Resource Assessment Program, California Department of Forestry and Fire Protection (CAL FIRE), the Project is not within a High Fire Risk Area (CAL FIRE 2020). The area surrounding the Project area is completely developed and not intermixed with wildlands.

Emergency Planning and Hazardous Materials Response

The City of Oakland is responsible for emergency planning/response and hazardous materials response.

Oakland Fire Department

The Oakland Fire Department (OFD) is responsible for hazardous materials response in the Project area. The OFD's responsibilities include on-scene management of incidents involving hazardous materials, such as accidental releases of toxic substances, industrial fires, and explosions involving petroleum products and other chemicals. The hazmat team includes specialists from the City's Office of Emergency Services (OES) to provide technical expertise in isolation, identification of chemicals, hazard assessment, containment, mitigation, decontamination, and disposal.

The OFD's Emergency Management Services Division (EMSD) is responsible for emergency planning and response in the Project area (City of Oakland 2014a). The EMSD's responsibility is to ensure Oakland is able to prevent, mitigate, prepare for, respond to, and recover from the effects of natural and human-caused emergencies. The EMSD coordinates activities related to planning, preparation, and

¹¹ The Army Reserve named the site the Heroic War Dead United States Army Reserve Center and used the site for vehicle maintenance, medical equipment storage, logistics, and training.

implementation of the City's Emergency Plan. The EMSD supports emergency response coordination of Oakland's police, fire, and other first responders via the City's Emergency Operations Center. The EMSD also coordinates with the Operational Area and other partner agencies to ensure integration of federal, State, and private resources into local response and recovery operations.

Oakland Office of Emergency Services

The Oakland OES assists local governments in their emergency preparedness, response, and recovery efforts; serves as the conduit for federal disaster assistance; provides emergency information to the public; and coordinates the statewide mutual aid system. The Oakland OES, a division of the OFD, serves as the Certified Unified Program Agency (CUPA) for the city, enforcing federal, State, and local legislation related to hazardous materials and operates the City's Emergency Operations Center.

2.9.1.2 Regulatory Setting

Regulations applicable to contaminated soils affecting stormwater runoff are included in Section 2.10, *Hydrology and Water Quality*.

Federal and State

Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established an EPA-administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous.

Cortese List

U.S. Code 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board as having underground storage tank leaks or a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites with a known migration of hazardous waste/material.

U.S. Department of Transportation Hazardous Materials Regulations (49 CFR 100–185)

U.S. Department of Transportation Hazardous Materials Regulations cover all aspects of hazardous materials packaging, handling, and transportation. Parts 107 (Hazard Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response), 177 (Highway Transportation) apply to the Project and/or surrounding uses.

California Health and Safety Code

DTSC, a department of CalEPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Division 20, Chapter 6.5, of the California Health and Safety Code deals with hazardous waste control through regulations pertaining to the transport, treatment, recycling, disposal, enforcement, and permitting of hazardous waste. Division 20, Chapter 6.10, contains regulations applicable to the

cleanup of hazardous materials releases. Title 22, Division 4.5, contains the environmental health standards for the management of hazardous waste. This includes standards for identification of hazardous waste (Chapter 11) and standards applicable to transporters of hazardous waste (Chapter 13).

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (California Health and Safety Code, Chapter 6.11, Sections 25404–25404.9)

This program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of the environmental and emergency response programs and provides authority to the CUPA. The CUPA is designed to protect public health and the environment from accidental releases and improper handling, storage, transport, and disposal of hazardous materials and wastes. This is accomplished via inspections, emergency response, enforcement, and site mitigation oversight. The CUPA for the City of Oakland is no longer the OFD OES. The California Environmental Protection Agency (CalEPA) has designated the Alameda County Department of Environmental Health (ACDEH) as the CUPA for the City of Oakland (City of Oakland 2020).

California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards exist in federal and State laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal OSHA) and the federal OSHA are the agencies responsible for ensuring worker safety in the workplace. Cal OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards would be applicable to both construction and operation of the Project. The standards included in the Cal OSHA's Title 8 include regulations pertaining to hazard control (including administrative and engineering controls), hazardous chemical labeling and training requirements, hazardous exposure prevention, hazardous material management, and hazardous waste operations.

California Labor Code (Division 5, Parts 1, and 7)

The California Labor Code is a collection of regulations that include the regulation of the workplace to ensure appropriate training on the use and handling of hazardous materials and the operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures employees that are in charge of the handling of hazardous materials are appropriately trained on, and informed of, the materials they are handling. Division 5, Part 7, ensures employees who work with volatile flammable liquids are outfitted in appropriate safety gear and clothing.

California Department of Forestry and Fire Protection Fire Prevention Program

The program encompasses multiple different facets of fire prevention techniques, including fire engineering, vegetation management, fire planning, education, and law enforcement. These techniques can include firebreak construction and other fire-fuel reduction activities to lessen the risk of wildfire in communities, brush clearance around communities and along roadways, and the creation of evacuation routes. The fire prevention program also includes defensible space inspections, emergency evacuation planning, fire prevention education, fire hazard severity mapping, implementation of the State Fire Plan, and fire-related law enforcement activities such as arson investigation.

Regional and Local

City of Oakland General Plan Safety Element

The Safety Element includes the following policies relevant to the Project, hazardous materials, and public safety (City of Oakland 2012):

- **Policy HM-1:** Minimize the potential risks to human and environmental health and safety associated with the past and present use, handling, storage and disposal of hazardous materials.
- **Policy HM-3:** Seek to prevent industrial and transportation accidents involving hazardous materials, and enhance the city's capacity to respond to such incidents.
- **Policy PS-1:** Maintain and enhance the city's capacity to prepare for, mitigate, respond to and recover from disasters and emergencies.
- **Policy FI-3:** Prioritize the reduction of the wildfire hazard, with an emphasis on prevention.

City of Oakland General Plan Open Space, Conservation, and Recreation Element

The OSCAR Element includes the following policy relevant to the Project, hazardous materials, and public safety (City of Oakland 1996):

- **Policy CO-1.2: Soil Contamination Hazards.** Minimize hazards associated with soil contamination through the appropriate storage and disposal of toxic substances, monitoring of dredging activities, and cleanup of contaminated sites. In this regard, require soil testing for development of any site where contamination is suspected due to prior activities on the site.

City of Oakland Local Hazard Mitigation Plan

The City of Oakland Local Hazard Mitigation Plan (City of Oakland 2016) identifies the hazards the community is facing, assesses the city's vulnerability to the hazards, and identifies specific actions to be taken to reduce the risk from these hazards.

City of Oakland Standard Conditions of Approval

As stated in Section 1.7.2, *Permits/Approvals*, the Oakland SCA includes conditions of approval for projects. The following SCA (summarized below) is required for all construction projects:

- 42. Hazardous Materials Related to Construction.** Best management practices, including the following, will be implemented as part of construction to minimize potential negative effects to groundwater and soils:
- a. Follow manufacture's recommendations for use, storage, and disposal of chemical products used in construction;
 - b. Avoid overtopping construction equipment fuel gas tanks;
 - c. During routine maintenance of construction equipment, properly contain and remove grease and oils;
 - d. Properly dispose of discarded containers of fuels and other chemicals;
 - e. Implement lead-safe work practices and comply with all local, regional, State, and federal requirements concerning lead (for more information refer to the Alameda County Lead Poisoning Prevention Program); and

- f. If soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums or other hazardous materials or wastes are encountered), the project applicant shall cease work in the vicinity of the suspect material, the area shall be secured as necessary, and the applicant shall take all appropriate measures to protect human health and the environment. Appropriate measures shall include notifying the City and applicable regulatory agency(ies) and implementation of the actions described in the City's Standard Conditions of Approval, as necessary, to identify the nature and extent of contamination. Work shall not resume in the area(s) affected until the measures have been implemented under the oversight of the City or regulatory agency, as appropriate.

The following SCA (summarized below) is required for all construction projects involving (a) redevelopment or change of use of a historically industrial or commercial site, (b) a contaminated site as identified in City records, or (c) a site listed on the State Cortese List; site remediation activities are required based on an environmental site assessment.

43. Hazardous Building Materials and Site Contamination.

- a. **Hazardous Building Materials Assessment.** The project applicant shall submit a comprehensive assessment report to the Bureau of Building, signed by a qualified environmental professional, documenting the presence or lack thereof of asbestos-containing materials, lead-based paint, polychlorinated biphenyls (PCBs), and any other building materials or stored materials classified as hazardous materials by State or federal law. If lead-based paint, asbestos-containing materials, PCBs, or any other building materials or stored materials classified as hazardous materials are present, the project applicant shall submit specifications prepared and signed by a qualified environmental professional, for the stabilization and/or removal of the identified hazardous materials in accordance with all applicable laws and regulations. The project applicant shall implement the approved recommendations and submit to the City evidence of approval for any proposed remedial action and required clearances by the applicable local, State, or federal regulatory agency.
- b. **Environmental Site Assessment Required Requirement:** The project applicant shall submit a Phase I Environmental Site Assessment report, and Phase II Environmental Site Assessment report if warranted by the Phase I report, for the project site for review and approval by the City. The report(s) shall be prepared by a qualified environmental assessment professional and include recommendations for remedial action, as appropriate, for hazardous materials. The project applicant shall implement the approved recommendations and submit to the City evidence of approval for any proposed remedial action and required clearances by the applicable local, State, or federal regulatory agency.
- c. **Health and Safety Plan Required:** The project applicant shall submit a Health and Safety Plan for the review and approval by the City in order to protect project construction workers from risks associated with hazardous materials. The project applicant shall implement the approved Plan.
- d. **Best Management Practices Required for Contaminated Sites:** The project applicant shall ensure that best management practices (BMPs) are implemented by the contractor during construction to minimize potential soil and groundwater hazards. These shall include the following:
 - (i) Soil generated by construction activities shall be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site

facility. Specific sampling and handling and transport procedures for reuse or disposal shall be in accordance with applicable local, State, and federal requirements.

- (ii) Groundwater pumped from the subsurface shall be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Engineering controls shall be utilized, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.

2.9.2 Discussion of Potential Impacts

a. **The Project would have a less-than-significant impact on the environment through the routine transport, use, or disposal of hazardous materials.**

Implementation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction of the Project is expected to occur over 24 months (October 2023 to October 2025). During construction, fuel and small amounts of solvents, paints, oils, grease and caulking would be transported, used, and disposed of in compliance with applicable regulations, such as the RCRA, Department of Transportation Hazardous Materials Regulations, and the ACDEH CUPA regulations. This would minimize hazards to the public and environment.

Operation and maintenance (O&M) activities for the Project would include trash removal (weekly), sweeping (monthly), and inspections (bi-annually) for restriping, resurfacing, and/or repairs. Materials for O&M are expected to be used in small, localized amounts, and any spills would be cleaned up as they occur. No hazardous materials would be used or stored onsite during normal Project operations. Therefore, potential impacts would be less than significant.

b. **The Project would result in a less-than-significant impact with mitigation from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.**

Implementation of the Project is not expected to 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. As mentioned under (a), construction-related hazardous materials that could be used and transported include fuel, solvents, paints, oils, grease, and caulking. It is possible that any of these substances could be released during construction activities. However, compliance with federal, State, and local regulations, in combination with construction BMPs implemented from a SWPPP (as required by the Construction General Permit), would ensure that all hazardous materials would be used, stored, and disposed of properly, which would minimize potential impacts related to a hazardous materials release during the construction phase of the Project. No hazardous materials are expected to be used or stored onsite during the operational phase of the Project. However, construction of the Link on the west side of I-880 could disrupt hazardous materials in the soils at the two sites identified as RECs in the Phase I ISA. As mentioned in Section 2.9.1.1, These sites are 1) the former OAB on the west side of I-880, south of the proposed Link, and 2) the Heroic War Dead Army Reserve Center on the west side of I-880, north of the proposed Link on the EBMUD site at 2400 Engineer Road.

At the former OAB, chemicals of concern associated with historic onsite land uses include heavy metals, VOCs, PCBs, polyaromatic hydrocarbons (PAHs), and organochlorine pesticides. According to the Phase I ISA, the Project would encroach upon three parcels (Parcels 4, 9, 11) of the former OAB. New foundations with columns supporting the elevated path and the western touchdown would be located in

these areas. According to the Phase I ISA, both Parcels 4 and 9 are considered areas where the release, disposal, and/or migration of hazardous substances has occurred; required actions have not yet been implemented. Parcel 4 contained elevated concentrations of arsenic in groundwater and benzidine in soil. Historical land uses in Parcel 9 included an oil reclamation plant and a gasoline station. Chlorinated solvents, including trichlorethene, are present in the groundwater in Parcel 11, along with PAHs and petroleum product-affected soil.

At the EBMUD site, contaminants, such as PAHs and lead, could be found in shallow soil. The EBMUD site was also noted as a REC because of its proximity to the Project site. Historic land uses onsite have included vehicle maintenance, medical equipment storage, logistics, and training. In addition, portions of the Project alignment cross over the UPRR and BNSF rights-of-way, which are typically viewed as potential areas of soil contamination because of the presence of petroleum or chemical conveyance pipelines within the right-of-way easement, potential spills, and weed abatement operations. Therefore, potential contaminants could be present within surficial soils.

As described in Section 1.6, *Project Construction*, soils would be tested for contamination during excavation. Clean soils would be used or sold for reuse at nearby construction sites. Contaminated soils would be disposed of at an appropriate facility.

Hazardous materials cleanup operations have been conducted in several portions of the former OAB, pursuant to the approval of the OAB Redevelopment Plan, required mitigation, and associated RAP/RMP. Required mitigation from the 2002 EIR prepared for the OAB Project (LSA 2012) includes:

Mitigation Measure 4.7-3: Implement RAP/RMP as approved by the DTSC, and if future proposals include uses not identified in the Reuse Plan and incorporated into the RAP/RMP, or if future amendments to the remediation requirements are proposed, obtain DTSC and City approval.

The redevelopment plan and RAP/RMP did not specifically include the proposed Link; therefore, DTSC and City approval would be required, as identified in Section 1.7.2, *Permits/Approvals*.

Implementation of **Mitigation Measure HAZ-1** (Prepare Phase II ESA), as recommended in the Phase I ESA, and **Mitigation Measure HAZ-2** (If Contaminated Soils Exist Onsite, Implement Engineering Controls and Best Management Practices to Minimize Exposure) would reduce impacts to less than significant.

c. The Project would result in a less-than-significant impact as a result of hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

As described under Existing Conditions, Ralph J. Bunche Continuation High School is within 0.25 mile of the east limits of the project area. The school is approximately 0.2 mile southeast of the Class II bike lanes proposed on 20th Street near Peralta Street and 0.25 mile southeast of the Class I portion of the Link proposed on West Grand Avenue near Mandela Parkway. Further, the school is at least a mile away from the western portion of the Class I portion of the Link where the two sites noted as RECs in the Phase I ISA are located.

As discussed under (a), Project construction would involve hazardous materials typical of a construction project; it is expected that the Project would be constructed in compliance with federal, State, and local regulations described under Section 2.9.1.2. In addition, any potential construction-related hazardous releases or emissions would be from commonly used materials such as fossil fuels, solvents, and paints and would not include substances listed in 40 CFR 355 (Extremely Hazardous Substances and Their Threshold Planning Quantities). Any such spills would be localized, immediately contained and cleaned, and have a less-than-significant effect on land uses 0.25 mile away, including Ralph J. Bunche

Continuation High School. As discussed under (b), project construction could result in excavation of soils and release of hazardous materials from the two sites identified in the Phase I ISA as being potential RECs. Although this is the case, the Ralph J. Bunche campus is approximately 1.5 miles southeast of the EBMUD site and approximately the 1 mile east of the OAB site. As such, it is very unlikely that potentially contaminated material from these sites would affect land uses farther than 0.25 mile away. Therefore, construction of the Project would not affect land uses 0.2 mile away, including Ralph J. Bunche Continuation High School, and impacts would be less than significant. Although not required to reduce these impacts to a less-than-significant level, implementation of **Mitigation Measures HAZ-1** and **HAZ-2**, would further decrease potential impacts related to emissions or the handling of hazardous or acutely hazardous materials, substances, or waste near an existing school.

- d. The Project would result in a less-than-significant impact with mitigation as a result of being located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.**

As described under Existing Conditions, the western portion of the Project area (west of I-880) would be adjacent to two sites, former the OAB and EBMUD sites, noted as potential RECs in the Phase I ISA. The Link alignment would extend through three parcels of the former OAB. As discussed under (b), excavation activities in this area could release hazardous materials into the environment. With implementation of **Mitigation Measures HAZ-1** and **HAZ-2**, this impact would be less than significant.

Once constructed, operation of the Project is not expected to create a significant hazard to the public or the environment by being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As mentioned above, the Project is a bicycle path; as such, it would not involve storing or handling hazardous materials during normal Project operations. Therefore, the Project is not included in lists of hazardous materials sites pursuant to Government Code Section 65962.5.

- e. The Project would result in no impact as a result of increased safety hazard due to proximity to a public airport or public use airport or the creation of a safety hazard or excessive noise for people residing or working in the project area due to proximity to a public airport or public use airport.**

Implementation of the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area due to proximity to a public airport or public use airport because the Project area is not within an airport land use plan area or within 2 miles of a public airport or public use airport.

- f. The Project would result in a less-than-significant impact as a result of impairment of or interference with an adopted emergency response plan or emergency evacuation plan?**

Implementation of the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Construction haul routes would be limited to key collector roads, including West Grand Avenue, Maritime Street, Frontage Parkway, and Wood Street. As discussed in Section 2.17, *Transportation and Traffic*, the project would incorporate the City's Standard Condition of Approval 74, Construction Activities in the Public Right-of-Way. Incorporation of this Standard Condition of Approval would reduce potential impairment to emergency access. described in Section 1.6.3, *Vehicle Access*, construction vehicles and equipment would not park or remain stationary within key roadways in such a manner that would block emergency vehicle access or hinder emergency response. Moreover, the Project would not include any features that would physically impair or otherwise interfere with emergency response or evacuation in the Project vicinity. The proposed intersection modifications at Campbell Street/West Grand Avenue alley (eastbound) would include the installation of bollards to allow emergency vehicles but prevent regular

vehicular traffic from crossing the new Class I portion of the Link. Where Willow Street currently intersects with West Grand Avenue, a cul-de-sac would be created to prevent vehicular traffic from crossing the new Class I portion of the Link on the south side of West Grand Avenue. However, Willow Street is a minor roadway; emergency vehicles passing through the area would use Wood Street, and 20th Street for access through the area.

The impact on emergency response would be less than significant.

g. The Project would result in no impact as a result of exposing people or structures to a significant risk of loss, injury, or death involving wildland fires.

Implementation of the Project would not 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. According to the “Very High Fire Hazards Severity Zones in LRA – Alameda County” figure (CAL FIRE 2020), the Project is not within a High Fire Risk Area. Furthermore, the area immediately surrounding the Project area is completely developed and not intermixed with wildlands. No impact would occur.

2.9.3 Mitigation Measures

Mitigation Measure HAZ-1: Prepare a Phase II Environmental Site Assessment.

Prior to construction, BATA/Caltrans will ensure a Phase II Environmental Site Assessment (ESA), as recommended in the Phase I ISA (Fugro 2014), is prepared for the portion of the Project area where planned foundations and surface soil disturbance will occur adjacent to the two hazardous materials sites, 1) the former OAB on the west side of I-880, south of the proposed Link, and 2) the Heroic War Dead Army Reserve Center on the west side of I-880, north of the proposed Link on the EBMUD site at 2400 Engineer Road. The Phase II ESA will include the following:

- A scope of work consisting of pre-field activities, such as preparation of a Health and Safety Plan, marking boring locations, and obtaining utility clearance, and field activities, such as identifying appropriate sampling procedures, health and safety measures, chemical testing methods, and quality assurance/quality control procedures in accordance with the ASTM Standard.
- A Sampling and Analysis Plan in accordance with the scope of work.
- Collection of soil samples per the Sampling and Analysis Plan.
- Laboratory analyses conducted by a State-certified laboratory.
- Disposal process including transport by a State-certified hazardous material hauler to a State-certified disposal or recycling facility licensed to accept and treat hazardous waste.

Mitigation Measure HAZ-2: If Contaminated Soils Exist Onsite, Implement Engineering Controls and Best Management Practices to Minimize Exposure to during Construction.

In the event that contaminated soils are found to exist onsite (per findings in the Phase II ESA report), BATA/Caltrans will ensure the construction contractor employs engineering controls and BMPs to minimize human exposure to potential contaminants. Engineering controls and construction BMPs will include, but not be limited to, the following:

- Contractor employees working onsite will be certified in OSHA’s 40-hour Hazardous Waste Operations and Emergency Response training.

- Contractor will monitor area around construction site for fugitive vapor emissions with appropriate field screening instrumentation.
- Contractor will water/mist soil as it is being excavated and loaded onto transportation trucks.
- Contractor will place any stockpiled soil in areas shielded from prevailing winds.
- Contractor will cover the bottom of excavated areas with sheeting when work is not being performed.