

UNITED BROTHERHOOD OF CARPENTERS & JOINERS OF AMERICA
Carpenters Local 713, Alameda County

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June 4, 2018

Attn: Planning Commission
County of Alameda
224 W. Winton Avenue, Room 111
Hayward, California 94544

RE: Asbestos or lead-based paint at 20478 Mission Boulevard

Dear Planning Commissioners:

Carpenters Local Union 713 ("Local 713") appreciates the opportunity to submit this addendum to our prior letter regarding the above-referenced property & related development application.

Local 713's union hall is located on Mattox Road immediately adjacent to the subject property associated with this development. The sole environmental review document that the project relies upon is the Initial Study prepared May 1, 2018. The Initial Study does not comply with the Eden Area General Plan's Policy P6, Goal SAF-4 ("Minimize Eden Area residents' exposure to the harmful effects of hazardous materials and waste"). Specifically, the project must, as a pre-condition for receiving planning approvals, conduct environmental investigation "to ensure that soil, groundwater and buildings affected by hazardous material releases from prior land uses and lead or asbestos in building materials will not have a negative impact on the natural environment or health and safety of future property owners or users." Public review documents for this project should summarize and attach any investigative reports, including, but not limited to, a Phase I Environmental Site Assessment. Local 713 urges Planning Commissioners to direct the applicant and staff to prepare and circulate a Mitigated Negative Declaration document for the project.

The developer proposes to demolish buildings used during its past at various points for industrial uses. The buildings' floor areas total approximately 60,000 square feet. Building construction at the project site occurred in 1948. Commercial real estate market intelligence company CoStar reports that the effective year built of the property was 1952. Phase I Environmental Site Assessments typically note that on-site structures constructed prior to 1980 may include asbestos-containing building materials. Lead-based paint may be present both on painted surfaced and on exposed soil surrounding painted structures that are the age of those at 20478 Mission Boulevard.

Please see the following reference material and summary points below.

[The Ashland and Cherryland Business District Specific Plan final EIR's review of potential impact HAZ-2 \(at page 4.7-10\) relies in part upon Eden Area General Plan Public Safety Element Policy P6 of Goal SAF-4 with respect to addressing hazards from asbestos-containing materials and lead-based paint. The Initial Study/Addendum for the Project fails to address the requirements of the referenced policy.](#)

The 2010 Eden Area General Plan Public Safety Element Policy P6 is excerpted below:

Goal SAF-4 Minimize Eden Area residents' exposure to the harmful effects of hazardous materials and waste.

P6. Developers shall be required to conduct the necessary level of environmental investigation to ensure that soil, groundwater and buildings affected by hazardous material releases from prior land uses and lead or asbestos in building materials will not have a negative impact on the natural environment or health and safety of future property owners or users. This shall occur as a pre-condition for receiving building permits or planning approval for development on historically commercial or industrial parcels.

Local 713 notes that no reference is made in any document included with the Staff Report for the project at 20478 Mission Boulevard that substantiates compliance with Eden Area General Plan Goal SAF-4 Policy P6. In fact, neither the word "lead" nor the word "asbestos" appear in the Initial Study/Addendum that accompanies the packet for the June 4th, 2018 approval hearing before the Planning Commission.

The sole references to hazardous materials in the Initial Study/Addendum document pertains to an underground storage tank that was removed in 1990 (see page 44). The Initial Study/Addendum does not include any information that can be reviewed by the Planning Commission, the Board of Supervisors or the public regarding the age of the buildings that the project would demolish, nor does it include any information on the exposure risks to hazardous lead-based or asbestos-containing materials faced by construction workers, project neighbors, or future project occupants. Local 713 believes that these omissions render the environmental review for the project inadequate.

Local 713 notes that walls of the existing buildings that likely contain lead-based paint and/or asbestos-containing building materials are on top of or immediately next to the existing lot line that separates the Project from the union hall property at 1050 Mattox Road (See figure 1 on page 3 below). Local 713 is concerned that demolition at 20478 Mission Boulevard could entail encroachment onto the union's property by demolished building materials, workers, or equipment. As a result of these aforementioned issues, Local 713 is troubled by the lack of plans to mitigate any hazards posed to the property, members, and users of the abutting Carpenters Local Union 713 union hall on Mattox Road.

Figure 1. Satellite aerial view of the Project property and Local 713's property



In closing, we urge the Planning Commission to (a) postpone approvals at tonight's meeting tonight in order to permit the Applicant and Local 713 time to discuss and negotiate Conditions of Approval that will ensure that the property rights and health and safety of Local 713, its members and visitors are protected; (b) direct staff to recirculate environmental review documents to the Commission and the public. If you have any questions or require additional information please contact Carpenters Local 713 Research Analyst Lorena Guadiana by emailing lguadiana@nccrc.org.

Sincerely,


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