



Rincon Consultants, Inc.

2215 Faraday Avenue Suite A
Carlsbad, California 92008

760 918 9444

FAX 918 9444

info@rinconconsultants.com

www.rinconconsultants.com

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Project 16-03641

Todd A. Deutscher
Catalyst Development Partners
18 Crow Canyon Court, Suite 190
San Ramon, California 94583

**Environmental Review Letter
Proposed Baker Road Residential Project
20785 and 20957 Baker Road
Castro Valley, Unincorporated Alameda County, California**

Dear Mr. Deutscher:

This Environmental Review Letter was completed by Rincon Consultants, Inc. for the proposed Baker Road Residential Project in Castro Valley, California (subject property). The subject property is identified as Assessor's Parcel Numbers (APNs) 84A-16-5-9 and 84A-16-6-4 and is composed of approximately 1.09 acres. It is our understanding that the proposed project would include demolition of the two single-family units and construction of a 20-unit townhome project composed of four buildings.

Previous Reports

Rincon reviewed the following reports associated with the subject property:

- *Draft Phase I Environmental Site Assessment, 20957 Baker Road, Castro Valley, California* prepared by ENGEO and dated August 23, 2016 – No recognized environmental conditions (RECs) were identified for the subject property. However, the former leaking underground storage tanks (LUSTs) at the subject property were identified as a historical recognized environmental condition (HREC). The former LUSTs were reported to have been removed and case closure was reported to have been granted in 2009. In addition, the following two potential environmental concerns were identified:
 - “Although the former LUSTs at the Property were removed and a case closure was subsequently granted, information in the former case file indicated that potential risks via vapor intrusion may not have been adequately assessed during past characterization activities.
 - Historical records for the Property indicated the Property was used for agricultural cultivation in the past. Recalcitrant agricultural chemicals could be present in near-surface soils.”



- *Phase II Environmental Site Assessment, 20785 Baker Road, Castro Valley, California* prepared by ENGEO and dated August 31, 2016 – The report indicated the purpose of the Phase II ESA was to evaluate the potential impacts to near surface soil due to past agricultural activity.

On August 19 and August 25, 2016, ENGEO collected shallow soil samples from six locations on the 20785 Baker Road portion of the subject property (S-2, S-3, S-5, S-6, S-7, and S-8). In borings S-2 and S-3, soil samples were collected at depths of 3 to 9 inches below ground surface (bgs) and 12 to 18 inches bgs. In the remaining four boring locations, soil samples were collected at depths of 3 to 9 inches bgs. The soil samples were reported to have been analyzed for organochlorine pesticides (OCPs) by Environmental Protection Agency (EPA) Method 8081 and lead and arsenic by EPA Method 6010.

According to the report, low levels of OCPs were detected in two boring locations. The levels detected were compared to the San Francisco Regional Water Quality Control Board (RWQCB) Soil Human Health Risk Screening Levels (SLs) for residential soil, dated February 2016 and were found to be below the SL for each respective chemical.

Lead was detected between 6.49 and 49.6 milligrams per kilogram (mg/kg) in all of the samples collected. These concentrations are below the lead SL of 80 mg/kg.

Arsenic was detected between 3.88 and 27.3 mg/kg in all of the samples collected, which were reported to be above the arsenic SL of 0.067 mg/kg. In addition, Rincon also compared the detected levels of arsenic to naturally occurring background concentrations in California soil established by the Kearney Foundation of Soil Science Division of Agriculture and Natural Resources¹. Arsenic was detected at or above the maximum background level of 11 mg/kg in S-2, S-3, S-5 and S-8.

This report also references another assessment, that indicates that volatile organic compounds (VOCs), total petroleum hydrocarbons as gasoline (TPHg), ethylbenzene, and naphthalene were detected in soil gas concentrations that exceeded their respective odor nuisance and/or human risk levels at 20957 Baker Road, a portion of the current subject property.

To address the impacted soil on the subject property at 20785 Baker Road, ENGEO recommended additional sampling to better define the lateral and vertical extent of contamination. ENGEO also stated that an excavation and off-site disposal program should be considered.

To address the impacted soil vapor at the 20957 Baker Road portion of the subject property, ENGEO recommended that a mitigation program will likely be necessary to

¹ https://envisci.ucr.edu/downloads/chang/kearney_special_report_1996.pdf



complete the proposed residential development. ENGEO also noted that additional soil and soil gas characterization should be considered at 20785 Baker Road.

Recommendations

Based on our review of available data, Rincon presents the following observations/recommendations:

- The exact locations of the former LUSTs at 20957 Baker Road were not identified in either of the reports reviewed. Therefore, it is unknown if the soil and soil gas sampling was conducted in the appropriate locations. In addition, the Phase II ESA for 20957 Baker Road was not provided for review.
- The lateral extent of arsenic-impacted soil at 20785 Baker Road is not fully delineated.
- The vertical extent of arsenic-impacted soil at 20785 Baker Road is unknown since the deeper samples collected at that property were not analyzed.
- A Phase I ESA for 20785 Baker Road was not reviewed.

Based on these observations and the available reports, Rincon concurs with ENGEO's recommendations. However, Rincon would like to review the Phase II ESA report for the 20958 Baker Road property to evaluate soil gas sampling locations, as well as any plans that identify the location of the former LUSTs on the subject property to ensure that the soil gas assessment conducted at the subject property is sufficient.

In addition, since the onsite structures were reportedly built as early as 1958, asbestos-containing materials (ACM) and lead-based paint (LBP) may be present onsite. Rincon recommends ACM and LBP surveys be conducted prior to demolition of the buildings.



If you have any questions regarding the content of this letter, or if we can be of any future assistance, please contact us.

Sincerely,
RINCON CONSULTANTS, INC.

Lauren Kodama Roenicke
Environmental Scientist

Walt Hamann, PG, CEG, CHG
Vice President

