

10.

Hazardous Materials

10 Hazardous Materials

10.1 Existing Conditions

10.1.1 Introduction

This section presents the existing conditions related to hazardous materials at the site. As discussed previously in this Environmental Impact Report (EIR) (Chapter 1. Introduction; Chapter 3. Land Use; Chapter 7. Hydrology and Water Quality; and Chapter 8. Biological Resources), the Inland Area of the Concord Naval Weapons Station (CNWS) has operated as a Navy installation for the storage of weapons since the early 1940s. The 5,028-acre portion of the CNWS Inland Area that is the site addressed in this EIR has been assessed for hazardous materials contamination through various site investigations and remediation (clean up) efforts conducted since 1983. These efforts are ongoing to the present day. The existing conditions description focuses on hazardous materials and waste, site contamination and clean up efforts, and materials of concern (including lead-based paint [LBP] and asbestos). The existing conditions description is derived from numerous source documents, including the Navy's Environmental Condition of Property Report for the Naval Weapons Station Seal Beach Detachment Concord (ECOP) (Department of the Navy, 2006a).

10.1.2 Hazardous Materials and Hazardous Waste

10.1.2.1 Definitions

Hazardous materials are generally defined as substances with certain chemical and physical properties that could pose a substantial hazard to human health or the environment when improperly handled, disposed of, or otherwise managed. Hazardous materials are categorized on the basis of the following properties: toxicity, ignitability, corrosivity, and reactivity, as regulated by Title 22 of the California Code of Regulations (Division 45, Chapter 11, Article 3). Hazardous materials are commonly used in commercial, agricultural, and industrial applications and, to a limited extent, in residential areas (City of Concord, 2007). Excavation can also expose buried hazardous materials that were used in the past.

Hazardous waste is generally defined as any hazardous material that is discarded, abandoned, or is to be recycled. The criteria that determine a material as being hazardous also apply to the definition of hazardous waste (California Health and Safety Code, Section 25151). Hazardous materials and wastes can result in public health hazards if released to the soil, groundwater, or air (City of Concord, 2007).

10.1.2.2 Background

Beginning in 1944, the site was used for ammunition storage and administrative and logistical support to other Navy installations. Onsite structures included administrative buildings, residential areas, military barracks, storage magazines (i.e., the Magazine Area or "Bunker City"), and maintenance facilities, many of which have been since demolished. The primary uses of the site were discontinued on October 1, 1999 when administration functions of the installation were transferred to the Tidal Area of the CNWS, resulting in a reduction in staff and reduced operations in the Inland Area. Subsequent to the reduction in operation, the Inland Area was scheduled for closure under the Base Realignment and Closure (BRAC) Program (November 9, 2005), except to retain the property and facilities

necessary to support operations in the Tidal Area that were transferred to the Army (Department of the Navy, 2007).

In 1983, the Navy initiated an Installation Restoration Program (IRP), the objective of which was to evaluate the effects of past operations resulting in contamination that could pose a risk to human health and the environment. The Navy issued an Initial Assessment Study in 1983 (Ecology and the Environment, 1983), followed by a Site Investigation study in 1993 (PRC, 1993), which identified 19 locations recommended for further evaluation.

In 1994, the Inland Area of the CNWS was added to the National Priorities List (also known as Superfund), which is a prioritized list of sites with known or threatened releases of hazardous substances, pollutants, or contaminants at locations throughout the U.S. This list is intended primarily to guide the U.S. Environmental Protection Agency (EPA) to prioritize locations that need further investigation (Department of the Navy, 2006a). The Navy identified 19 locations that could pose a potential hazard to human health or the environment as a result of past operations. These locations (both active and inactive) are shown on Figures 10-1 and 10-2, respectively.

The site also previously operated under a California Environmental Protection Agency (Cal EPA), Department of Toxic Substances Control (DTSC) permit as a hazardous waste facility. The DTSC regulates the generation, transport, treatment, storage, and disposal of hazardous waste under the federal Resource Conservation Recovery Act (RCRA) and the California Hazardous Waste Control Law. On June 27, 2003, DTSC closed the permitted hazardous waste facilities at the site and certified them as clean.

The site is currently operating in a small quantity generator status, with one accumulation site, Building 433, and one satellite accumulation area, Building IA-8, in the Administrative Area (Department of the Navy, 2006a). The waste generated is minimal and comprises basic maintenance items, including: rags, waste oil, fluorescent light ballasts and tubes, waste batteries, mineral spirits, waste antifreeze, waste boiler chemicals, waste adhesives, waste wood/creosote, waste solvents, waste paints, and waste cleaning compounds (Department of the Navy, 2006a).

10.1.3 Regulatory Process

The site is continuing to undergo cleanup under several regulatory programs, discussed below, in accordance with the BRAC Program.

10.1.3.1 Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) authorizes the EPA to respond directly to releases of hazardous substances that could endanger public health or the environment. The EPA is the lead regulatory agency role for sites on the National Priorities List (NPL also known as Superfund), whereas the State is the lead regulator for non-Superfund sites. Under Superfund, past and present property owners retain liability for contamination. The Department of Defense is responsible for the costs of remediation at sites owned or operated by the military. For the CNWS, the liability for cleanup remains with the Navy (DTSC, 2005).

To ensure that current and future users of a site and its vicinity are not endangered by environmental contamination, Superfund and other associated regulations define a site clean up process. Table 10A-2 in Appendix 10A presents the status of CNWS cleanup sites under the Superfund program. The Superfund cleanup process involves several steps that must be completed (DTSC, 2005), including preparation of a Remedial Investigation (RI) and Feasibility Study (FS). The RI is a work plan to investigate the nature and extent of site contamination, the risk posed to public health and the environment, and the available cleanup methods for the site. The FS evaluates technical and institutional controls for accomplishing the cleanup and selects one to implement. A Record of Decision (ROD) is prepared that documents the rationale for selecting the alternative. This ROD also documents how the selected clean up remedy complies with all statutory and regulatory requirements.

10.1.3.2 Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) established a regulatory system to track hazardous wastes from the time of generation to final disposal, also known as “cradle to grave.” The law requires safe and secure procedures to be used in treating, transporting, storing, and disposing of hazardous wastes. RCRA’s provisions give state regulatory agencies authority to regulate solid and hazardous wastes. In addition, DTSC is authorized to implement RCRA in California in lieu of the EPA (DTSC, 2005).

RCRA requires permits for certain hazardous waste management activities. The RCRA permits that govern these activities must be closed out at the end of the waste storage or disposal period. RCRA requires that permit-holders go through a specified closure process that includes a public comment period. Any change in ownership of a property with a RCRA permit requires a permit modification because RCRA liability can transfer to the new owners if the new owner chooses to continue the permitted hazardous waste activity. When the facility no longer is used for permitted hazardous waste activities, the facility and permit closure process begins which can include termination of corrective action (DTSC, 2005).

Please refer to Appendix 10A, Table 10A-2, for the status of CNWS sites under the RCRA program.

10.1.4 Contamination and Cleanup

In 2006, the Navy summarized the environmental condition of the property, including the Inland Area that includes the site, and documented the status of the clean up efforts in the ECOP (Department of the Navy, 2006a). The clean up efforts at the Inland Area fall into three major ongoing environmental programs discussed below. Additional information on the contaminants at the Inland Area is in Appendix 10A, Table 10A-2. In the ECOP (Department of the Navy, 2006a), the Navy concluded that contamination has not migrated outside the boundaries of the CNWS Inland Area.

10.1.4.1 Investigation and Cleanup from Past Practices

Investigation and cleanup of contamination from past practices at the Inland Area are conducted in accordance with the Department of Defense’s Installation Restoration Program (IRP). Federal agencies are responsible for cleaning up contamination at installations they either own or operate or where they have contributed to site contamination (Matrix, 2005). The Navy uses this program to identify, investigate, and clean up contamination from

hazardous substances, pollutants, and contaminants at active or operating Naval installations (Department of the Navy, 2006b).

Past activities included such activities as using open burn pits to dispose live ordnance (Site 13 – Burn Area), burning fuel oil for firefighter training (Site 13 – Burn Area), using oils and hydraulic fluids to test the structural integrity of munitions casings (Site 27 – Building IA-20), and surface applications of herbicides (Site 22 – Magazine Area). These and similar activities occurring at the site have contributed to the existing conditions of the onsite soils and groundwater today (Department of the Navy, 2006a).

Site 22, the Magazine Area, is contaminated with arsenic. In 1945, 91 magazines were built in this area to store ammunition and explosives. In 1953, an additional 53 magazines were built around the perimeter. Site 22 was in use until 2000. While in use, herbicides containing arsenic were applied to the surface soils to control weeds and reduce fire hazards. Elevated arsenic levels have since been discovered in the surface soils of Site 22. Soils near the perimeter double fence line and the water in Mt. Diablo/Seal Creek were tested. Arsenic concentrations were below background in Mt. Diablo/Seal Creek and were generally below background levels along the perimeter double fence line. The distribution of arsenic in soil indicates that the areas with elevated concentrations are the Magazines Area and associated buildings constructed in the 1940s. The elevated levels are primarily in the upper 1/2 foot of soil (Tetra Tech, 2007).

The status of each installation restoration site, as identified in Figures 10-1 and 10-2, is summarized in Appendix 10A, Table 10A-2, including the acreage of the areas affected and the constituents of concern.

10.1.4.2 Solid Waste Management

Solid Waste Management Units (SWMUs), or solid waste disposal areas, are locations where solid waste has been placed at any time and hazardous substances have been released. The DTSC identified 33 solid waste areas at the site and recommended that 14 of these required no further action (DTSC, 1992) (Department of the Navy, 2006a). The Navy recommended no further action for an additional 15 solid waste disposal areas based on the findings of a facility assessment (PRC, 1997) and other relevant assessments (CH2M HILL, 1997). Regulatory agencies have not yet concurred with the Navy's recommendations of no further action for those 15 locations (Department of the Navy, 2006a). The solid waste disposal areas are shown on Figure 10-3. The status of each area is summarized in Appendix 10A, Table 10A-2, including the acreage of affected areas and the constituents of concern.

10.1.4.3 Munitions and Explosives

Munitions and explosives are managed as part of the Department of Defense's Military Munitions Response Program (MMRP) to address areas where munitions and explosives might be present in the environment, including the physical remains of ammunition and potentially explosive materials and residual material of munitions, such as chemical components, that have leached into the soil. The Navy identified nine areas potentially containing munitions and explosives (Malcolm Pirnie, 2005). Figure 10-4 shows each of these locations. The Navy has recommended no further action for five of these areas, and further investigation of the following four areas:

- Railroad siding excavations,
- Burn area near HE-58,
- Eagle's Nest Explosive Ordinance Disposal (EOD) Area, and
- Former inland burn area.

The status of each of these four munitions and explosives area is summarized in Appendix 10A, Table 10A-2, including a description, acreage affected, munitions or residual explosive materials, and detail on the cleanup process.

10.1.4.4 Storage Tanks

Historically, a total of 64 storage tanks (42 underground and 22 aboveground) were located in the Inland Area of the CNWS. Only five underground tanks (each of which is 12,000-gallon capacity) remain in the Inland Area. These tanks have been cleaned and are temporarily closed. Three of the remaining aboveground tanks are in use and all contain propane (Department of the Navy, 2006a). Appendix 10A, Table 10A-1, includes a description of the history, use, and status of all the storage tanks at the site.

10.1.4.5 Lead-based Paint and Asbestos

Lead-based paint and asbestos are regulated at the State and federal level to protect public health and the environment.

Lead-based Paint

Lead was a major ingredient in house paint used throughout the U.S. for many years and can be found on interior and exterior surfaces of housing units. Lead-based paint is defined as any paint or surface coating that contains more than 0.5 percent lead by weight and is a hazardous material because it can slough off as dust or chips that can be easily inhaled or ingested. In 1978, the 0.06 percent maximum lead content of newly applied dry paint was set by the Consumer Product Safety Commission. The use of lead-based paint was discontinued entirely in 1980 (EPA, 2008).

The EPA and the Occupational Safety and Health Administration (OSHA) are responsible for implementing federal laws related to lead and lead-based paint under Title X of the Toxic Substances Control Act. The Cal-EPA DTSC and California OSHA (Cal-OSHA) are responsible for implementing State laws and protections related to lead and lead-based paint through the California Health and Safety Code.

Because structures at the site were built before 1978, lead-based paint is a concern. The Navy conducted surveys for lead-based paint at the site in 1996, 1997, and 2002. Many areas were excluded from these surveys because they were considered nonresidential buildings (Department of the Navy, 2006a). The Navy surveyed Building 245 A-D and found lead-based paint. All other buildings in the site have either been demolished or have not been surveyed (Department of the Navy, 2006a).

Asbestos

Similar to lead-based paint, asbestos is a common building material found in buildings constructed prior to 1980. If structural components containing asbestos, such as insulation, floor or ceiling tiles, and certain piping materials, are not maintained, asbestos may become airborne (OSHA, 2002). Asbestos abatement is federally regulated under the Toxic

Substances Control Act, Title II, Asbestos Hazard Emergency Response. Asbestos is also regulated on the State level by Cal-OSHA and on the local level by the Bay Area Air Quality Management District (BAAQMD).

The Navy conducted surveys to identify asbestos-containing materials (ACMs) in 1988, 1999, and 2000 at the site. Asbestos-containing materials include friable materials (i.e., spray-on acoustical plaster, thermal systems, and boiler insulation); and non-friable materials (i.e., floor tiles and roofing). Forty of the 49 remaining buildings (i.e., those that have not been demolished) were found to contain asbestos materials (Department of the Navy, 2006a). Appendix 10A, Table 10A-3, provides a detailed summary of the findings of the surveys.

10.1.5 Property Transfer Responsibilities

10.1.5.1 Base Realignment and Closure Guidance

The Base Realignment and Closure Act of 1990, as amended, provides a process by which military installations are closed or realigned to meet the infrastructure, training, and force structure requirements of the military. In previous years, the explicit goal of BRAC was to save money and downsize the military. During BRAC 2005, the Department of Defense reorganized its installation infrastructure to support its forces efficiently, increase operational readiness, and facilitate new ways of conducting business. The BRAC 2005 Commission submitted its recommendations to President Bush on September 8, 2005. On September 15, 2005, President Bush notified Congress of his approval of the Commission's recommendations. Congress had until November 9, 2005, to reject those recommendations. When it did not do so, those recommendations became law (Defense BRAC Commission, 2005).

The Department of Defense is responsible for complying with laws pertaining to the cleanup of hazardous substances and petroleum products. According to the Department of Defense's Base Redevelopment and Realignment Manual (Department of Defense, 2006):

The Department of Defense must ensure that appropriate response or corrective actions related to petroleum products or their constituents and hazardous substances have been taken, or will be taken, to protect human health and the environment on property that is to be transferred.
(Department of Defense 2006)

For a property to be conveyed, the Navy must make a Finding of Suitability to Transfer. This process is intended to determine whether property is environmentally suitable for its intended use and whether there should be any restricted use of the property (i.e., institutional controls) (Department of Defense, 1997). Institutional controls are structural or legal mechanisms used to limit access to, or restrict the use of, property (Department of Defense, 1997).

10.1.5.2 Transfer Process at CNWS

For the CNWS, the Navy is proceeding with developing a cleanup strategy (remedy) in accordance with the requirements of CERLA and RCRA, as discussed in Section 10.1.2.2, and in accordance with Department of Defense guidance (Department of Defense, 2006) to address environmental issues and prepare the CNWS for transfer. The Navy is currently in

the RI/FS stage for most of the contaminated sites, and future use cleanup standards have not yet been developed. The FS could result in a finding that the cleanup would be conducted to conform to the following land uses.

- **Unrestricted Use.** Unrestricted use means that hospitals, daycare centers, single family houses, schools, and other “sensitive uses” can be built on the property without danger to future users. Cleanup to unrestricted use involves removing contaminants to either non-detectable levels or levels which are safe for humans and environmental receptors (DTSC, 2005).
- **Commercial/Industrial Use.** Commercial/Industrial use means that the site would need to be cleaned to a level that is commensurate with future commercial or industrial use of the site. This could involve use of pavement or impervious material to cover contamination (DTSC, 2005).
- **Institutional Controls.** If a site cannot be cleaned to unrestricted use standards, some sort of institutional controls must be in place to protect public health and the environment. In general, the term “institutional controls” is used to describe a suite of both engineering and administrative controls placed on a site to prevent contact with contaminants by future users. Engineering controls are any physical barrier preventing contact with contaminants or migration of contaminants offsite. Administrative controls are non-engineering mechanisms that restrict activities on the site to prevent exposure to contaminants by property users. These can include deed restrictions, land use covenants, public notice, and warning signs (DTSC, 2005).
- **Land Use Covenants.** Land use covenants (LUCs) are an important part of the remedy selection at former military sites, and are required by California law for any site with remaining contamination after the remedy is implemented. Assurances must be made that the remedy will continue to protect human health and the environment into the future. LUCs are essentially requirements placed on all successive property owners that land use restrictions will continue to apply into the future (DTSC, 2005).

The Navy is evaluating alternative remedies for the CNWS. Although the Navy could approve cleanup of the site to unrestricted use levels, the Department of Defense’s property transfer guidance states that the Department of Defense “prefers that Military Department cleanup decisions be based on the current use of the property” (Department of Defense 2006). The Department of Defense’s guidance states that selection of a remedy based on current or historic uses (and not future proposed uses) expedites clean up of contaminated sites. The existing land use at the CNWS is considered by the Navy to be Commercial/Industrial.

The guidance further states that if a future property owner proposes less restricted uses of a property (e.g., Unrestricted Use versus Commercial/Industrial), the clean up costs “may be borne by the new owner as part of redevelopment of the property for new uses.” (Department of Defense 2006). The land use assumptions used in this EIR analysis for cleanup at the site are discussed in Section 10.3.1, Assumptions.

10.2 Standards of Significance

Criteria for determining the significant impacts associated with hazards and hazardous materials have been developed based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines and any relevant agency thresholds. For purposes of this EIR, an alternative may have significant hazardous materials impacts if it would:

- Create a public hazard through transport, use, or disposal of hazardous materials or through upset or accident involving release of hazardous materials.
- Emit hazardous emissions or involve handling hazardous materials within ¼ mile of an existing or proposed school.
- Be located on a site that is listed as hazardous by the Cal-EPA.
- Result in safety hazards near a public or public-use airport or private airstrip.
- Impair implementation of an adopted emergency response or evacuation plan.
- Result in a conflict of the land uses proposed under the alternative concepts and the land uses (and cleanup level) determined by the Navy.

10.3 Potential Hazardous Materials Impacts

This section begins with a description of assumptions that have been incorporated in the analysis of potential hazardous materials impacts. Then, impacts common (C) to all seven alternative reuse concepts are identified. Impacts that are considered to be significant are presented first, accompanied by an explanation why the application of a standard resulted in a determination that the impact would be significant. When a significant impact has been set forth, mitigation measures to address that potential impact are also presented, along with a determination of whether the impact will continue to be significant after implementation of the mitigation measure. Next, impacts that are less than significant are presented. After the presentation of information about the impacts common to all of the seven alternative reuse concepts, information is then presented about potential land use impacts that are specific to Alternative Concepts 1 through 7. Potentially significant impacts and mitigation measures are presented first, followed by impacts that are considered to be less than significant. The section concludes with a description of the potential impacts of the “No Project” (NP) Alternative.

10.3.1 Assumptions about Potential Hazardous Materials Impacts

The following assumptions that have been applied in the analysis of potential hazardous materials impacts of the alternative reuse concepts. The assumptions are based on information gathered during the planning process to develop the seven alternative reuse concepts. This information has been incorporated into all the reuse concepts as ways to avoid or minimize their environmental consequences.

- As discussed in Section 10.1.5.2, although the Navy could approve cleanup of the site to unrestricted use levels, the Department of Defense’s property transfer guidance states that the Department of Defense prefers the cleanup be conducted to existing uses of the property. Because it is unknown what the Navy will eventually determine to be the appropriate land use at the site, this EIR evaluates impacts assuming that the

property will be cleaned up to meet the Commercial/Industrial land use. This assumption allows for full disclosure of impacts, even though Commercial/Industrial may not be the end land use selected by the Navy as a basis for cleanup of the site.

- Any land use cleanup requirements beyond what the Navy is required to perform would be the responsibility of the new property owner.
- When the property is conveyed from the Navy to the new land owner, any areas released for transfer that are incompatible for future land use will be transferred with restrictions and/or institutional controls.
- All buildings that are subject to demolition that have not already been surveyed shall be surveyed for asbestos and lead-based paint hazards, or be assumed to contain asbestos and lead-based paint and be demolished according to applicable federal, State, and local regulations.
- Underground and aboveground storage tanks, including any associated soil contamination, would also be removed. This removal activity would eliminate potential hazards associated with these materials.
- The site would comply with applicable federal, State, or local laws and regulations or cleanup standards specific to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a Superfund site (EPA, 1992).
- Ongoing remediation and future project-specific construction activities at the site would implement standard best management practices (BMPs) and other reasonable care to prevent accidents, spills of potentially hazardous materials, or other avoidable risks to the public and the environment.
- Implementation of any of the seven proposed alternative reuse concepts would require an amendment to Concord's General Plan. At that time, the following General Plan Policies would be in affect as they relate to hazardous materials: Policy S-5.1.1, Policy S-5.1.3, Policy S-5.1.4, and Policy S-5.1.5 (unless specifically modified to reflect conditions at the site).

10.3.2 Hazardous Materials Impacts Common (C) to all Seven Alternative Concepts

10.3.2.1 Common Potentially Significant Hazardous Materials Impacts

Impact Hazardous Materials C-1: All seven alternative reuse concepts could create a public hazard through upset or accident involving release of hazardous materials. This impact is considered to be potentially significant.

Site preparation, remediation, and development of areas that contain contaminated soil could expose remediation and construction workers, and potential visitors to the site to contaminated conditions. Exposure to lead-based paint or asbestos during demolition or renovation of buildings or structures could create a substantial hazard to human health.

Mitigation Measure Hazardous Materials C-1: Prior to approving any development at the site, the City of Concord shall require new property owners to demolish or renovate buildings in accordance with appropriate

federal, State, and local regulations addressing exposure to lead based paint on asbestos. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Prior to issuing any occupancy permits for development at the site, the City of Concord shall require that all buildings that have not been surveyed for asbestos or lead based paint are surveyed or assumed to contain these materials. To prevent exposure to workers and site visitors, the City shall require that buildings proposed for demolition or renovation shall be demolished in accordance with appropriate federal, State, and local regulations.

Conducting surveys and demolishing/renovating buildings in accordance with appropriate regulations would reduce this impact to less than significant.

Impact Hazardous Materials C-2: All seven alternative reuse concepts could emit hazardous emissions or involve handling hazardous materials within ¼ mile of an existing or proposed school. This impact is considered to be potentially significant.

Exposure to hazardous materials and/or emissions has the potential to create a substantial hazard to human health. Monte Gardens Elementary School is located on Larkspur Drive, south of Willow Pass Road; Concord High School is located on Concord Boulevard; and the Tabernacle School is also located on Concord Boulevard. All these schools are adjacent to the western boundary of the site and Site 22. Site 22 (Building 7SH5 and Magazine Area) abuts this boundary and is known to contain arsenic in the surface soil from historic pesticide application. No other schools are within ¼ mile of the site.

Community facilities, which include the opportunity for construction of schools, are proposed in all seven alternatives. While the locations of these facilities vary by alternative, there are community facilities proposed under each alternative that could result in a conflict with the existing sites with known contamination. The proximity of existing and potential future schools to contaminated site conditions creates a potentially significant impact.

Mitigation Measure Hazardous Materials C-2a: Prior to approving occupancy permits at the site, the City of Concord shall require the preparation of a Hazardous Materials Management Plan.

Prior to issuing any occupancy permits for development at the site, the City of Concord shall require the business operators to prepare and update annually a Hazardous Materials Management Plan and file it with the Contra Costa County Department of Health Services (CCCDHS) Certified Unified Program Agency (CUPA). The business plan shall apply to businesses that use hazardous materials within ¼ mile of an existing or proposed school. The plan shall detail the types and quantities of chemicals stored at a given location, the storage location and types of storage containers, and the emergency response equipment available at the property (i.e., location of fire hydrants and extinguishers). It also provides a map showing the location of all of these items as well as major utilities. This documentation would fulfill federal and State requirements, if applicable, and would also assist the County in their Emergency Response and Planning efforts.

Mitigation Measure Hazardous Materials C-2b: Prior to issuing any occupancy permits for development at the site, the City of Concord shall require the continued remediation at Site 22. With implementation of these

mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Prior to issuing any occupancy permits for development at the site, the City of Concord shall require that ongoing remedial efforts in the area of Site 22 would continue until soil conditions meet the standards applicable to proposed future uses. The potential risks associated with affected areas shall be assessed according to required federal regulations, specifically those relevant to Superfund sites. A RI and FS shall be prepared identifying sites where soils are contaminated above agency-approved remedial action goals, as defined in the study, and requiring cleanup prior to site development. The RI and FS shall specify measures to be taken to protect workers and the public from exposure to potential contamination and certify that the proposed remediation measures, including removal, disposal, stabilization, and/or other institutional controls are protective of human health and the environment and implemented in accordance with federal, State, and local requirements. A site Health and Safety Plan shall be prepared in accordance with OSHA and Cal-OSHA regulations. Hauling contaminated soils off the site, if required, shall comply with applicable laws. With the implementation of these two mitigation measures, this potential significant impact would be reduced to a level that is less than significant.

Impact Hazardous Materials C-3: All seven alternative reuse concepts could be located on a site that is listed as hazardous by the Cal-EPA. This impact is considered to be potentially significant.

The site is listed by the Cal-EPA DTSC on the Hazardous Waste and Substances Site List (“Cortese List”) (DTSC, 2008). The site is listed as active and is also listed on the NPL, with the EPA as the lead agency for cleanup oversight.

Mitigation Measure Hazardous Materials C-3a: Prior to approving any development at the site, the City of Concord shall require that State and Federal regulators make a finding that adequate site remediation or land use restrictions have been completed.

Prior to issuing any occupancy permits for development at the site, the City of Concord shall require that the property must be found suitable for the intended uses of the site, consistent with the protection of human health and the environment. This can be accommodated either through remedial action concluding with the site being granted a no response or no further response status or through appropriate covenants, conditions, or restrictions applied to the land use to avoid future land uses from conflicting with the existing site conditions. Site cleanup or land use restrictions would prevent potential exposure to humans or the environment, pursuant to EPA and federal BRAC guidelines. The impact would, therefore, be reduced to less than significant.

Mitigation Measure Hazardous Materials C-3b: Prior to approving any development at the site, the City of Concord shall require that new property owners propose (or cause new property owners to propose) the site be deleted or partially deleted from the NPL and work with the EPA and the DTSC toward that objective. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Prior to issuing any occupancy permits for development at the site, the City of Concord shall propose that the site be deleted or partially deleted from the NPL by the EPA. The processes for deletion or partial deletion from the NPL differ slightly.

To delist federal facilities, a demonstration must be made that "all appropriate and required response actions" were implemented at the facility, or that "the release of hazardous substances poses no significant threat to the public health, welfare, or the environment, thereby eliminating the need for remedial action" 40 CFR §300.425(e). The EPA's policies for the partial delisting of Superfund sites are set out in its partial deletion policy (OERR Directive 9320.2-11). Partial deletions may occur where it is demonstrated that the portions of the site being deleted from Superfund meet the criteria for site deletion, pursuant to Section 300.425 (e). For deletion of a site from the NPL, the EPA determines, in consultation with the State, that no further response is appropriate under CERCLA (40 CFR 300.425(e)) and one of the following criteria must be met (Department of the Navy, 2006b):

- The responsible or other parties have implemented all appropriate and required response actions;
- All appropriate Superfund-financed responses under CERCLA have been implemented and no further response action is required; or
- The release of hazardous substances poses no significant threat to the public health, welfare, or the environment, thereby eliminating the need for remedial action.

Partial delisting is appropriate when no further response is appropriate for a portion of the site. The EPA uses the same policies outlined in 40 CFR 300.425(e), but also requires that the area proposed for partial deletion be accurately mapped and that documents be submitted warranting a partial deletion (Department of Energy, 2000). Documents that can be used for this process include Remedial Action Reports, ROD Amendments, or Final Pollution Reports. The delisting process is initiated by petitioning the EPA Regional Office (for the CNWS, the applicable region is EPA Region IX) to delete the specified portion of the site from the NPL. To support the petition, a "Partial Deletion Docket" must be submitted to EPA that sets forth the facts demonstrating that all appropriate remedial actions have been implemented, and that there is no remaining threat to human health or the environment.

The EPA must then secure the State's concurrence that the site meets the criteria for delisting as demonstrated by the DTSC's concurrence and the signature of the Governor of California. After the State has issued a letter of concurrence, EPA must prepare and publish a Notice of Intent to Delete ("NOID"). The NOID, which initiates a 30-day public comment period, must be published in the *Federal Register* and in a newspaper of general circulation in the relevant community. After the comment period is over, EPA must publish detailed responses to any comments received in a Responsiveness Summary. If, based on the response document, EPA determines that deletion from Superfund is appropriate, it will file a "Notice of Deletion" in the *Federal Register* stating that all cleanup actions have been implemented and that no further response actions are necessary or appropriate for the portion of the site being deleted from Superfund.

Through the delisting or partial delisting of the site from the NPL, the impact would be reduced to less than significant.

Impact Hazardous Materials C-4: All seven alternative reuse concepts could result in a conflict of the proposed land use under the alternative concepts and the end land uses determined by the Navy. This impact is considered to be potentially significant.

All seven of the alternative reuse concepts include proposed land uses that would conflict with the Commercial/Industrial land uses assumption used in this EIR. As discussed in Section 10.1.5.2, based on Department of Defense guidance for property transfers and cleanup of those properties, existing uses are the preferred end use for planning of cleanup strategies. For this EIR, it is assumed that the Navy will base its clean up decisions on a Commercial/Industrial land use. All seven alternatives propose land uses (residential, active parks) in existing contaminated areas (Site 13 Burn Area, Site 22, Site 22A). Implementation of a mix of the land uses proposed in the seven alternatives would require clean up to unrestricted use; i.e., beyond the Navy clean up to Commercial Industrial use. The need for additional clean up beyond the Navy's effort would be considered a potentially significant impact. While there are common impacts among the alternatives, there is also a variance in the magnitude (number of acres impacted) that is discussed in Sections 10.3.3 through 10.3.9.

Mitigation Measure Hazardous Materials C-4: Prior to approving any development at the site, the City of Concord shall require that the site is cleaned up to unrestricted use standards where proposed land use in the Reuse Plan conflicts with the Navy cleanup standards.

Prior to issuing any occupancy permits for development at the site, the City of Concord shall require new property owners to work with State and federal regulators to see that the necessary portions of the site are cleaned up to unrestricted use standards. Although the liability for cleanup would remain with the Navy, the cost of such additional cleanup (i.e., cleanup to levels beyond those identified by the Navy for existing Commercial/Industrial uses) would be the responsibility of the new property owner. By remediating the site to the proposed end land use proposed under the alternative reuse concepts, this impact would be reduced to less than significant.

10.3.2.2 Common Hazards and Hazardous Materials Impacts that are Less Than Significant

Impact Hazardous Materials C-5: All seven alternative reuse concepts could create a public hazard through transport, use, or disposal of hazardous materials. This impact is considered to be less than significant.

The use, storage, transport, and disposal of hazardous materials under any of the alternative reuse concepts would be required to be in compliance with federal, State, and local regulatory requirements and use BMPs. In addition, the use of hazardous materials during construction, operation, and maintenance would be evaluated in future project-specific analyses and the application of relevant and applicable use practices and BMPs for handling hazardous materials and waste from construction phases of site redevelopment would be implemented, resulting in a less than significant effect on human health or the environment.

Mitigation Measure Hazardous Materials C-5: None required.

Impact Hazardous Materials C-6: All seven alternative reuse concepts would not result in safety hazards near a public or public-use airport or private airstrip. This impact is considered to be less than significant.

The site is located within the influence area of Buchanan Field Airport. The site is located outside of the safety zones for the airfield. The Contra Costa County Airport Land Use Commission (ALUC) would review the compatibility of future site-specific development proposals with the airport's approved and planned use.

Mitigation Measure Hazardous Materials C-6: None required.

Impact Hazardous Materials C-7: All seven alternative reuse concepts would not impair implementation of an adopted emergency response or evacuation plan. This impact is considered to be less than significant.

The specific development or use for each alternative concept is designed and would be implemented so as not to interfere with or impair the implementation of an adopted emergency response or evacuation plan. Emergency response issues are addressed by the Contra Costa County Fire Protection District (CCCFPD), which requires adequate access roads and building markings to facilitate emergency response. The county does not have a formal evacuation plan.

Mitigation Measure Hazardous Materials C-7: None required.

10.3.3 Hazardous Materials Impacts of Alternative Concept 1

10.3.3.1 Potentially Significant Hazardous Materials Impacts of Alternative Concept 1

Impact Hazardous Materials 1-1: All seven alternative reuse concepts could create a public hazard through upset or accident involving release of hazardous materials. This impact is considered potentially significant.

The analysis of Impact Hazardous Materials 1-1 is the same as Impact Hazardous Materials C-1.

Mitigation Measure Hazardous Materials 1-1: Prior to approving any development at the site, the City of Concord shall require new property owners demolish or renovate buildings in accordance with appropriate federal, State, and local regulations addressing exposure to lead based paint on asbestos. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 1-1 is the same as Mitigation Measure Hazardous Materials C-1.

Impact Hazardous Materials 1-2: All seven alternative reuse concepts could emit hazardous emissions or involve handling hazardous materials within ¼ mile of an existing or proposed school. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 1-2 is the same as Impact Hazardous Materials C-2.

Mitigation Measure Hazardous Materials 1-2a: Prior to approving occupancy permits at the site, the City of Concord shall require the preparation of a Hazardous Materials Management Plan. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 1-2(a) is the same as Mitigation Measure Hazardous Materials C-2 (a).

Mitigation Measure Hazardous Materials 1-2b: Prior to approving any development at the site, the City of Concord shall require the continued remediation at Site 22. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 1-2(b) is the same as Mitigation Measure Hazardous Materials C-2 (b).

Impact Hazardous Materials 1-3: All seven alternative reuse concepts could be located on a site that is listed as hazardous by the Cal-EPA. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 1-3 is the same as Impact Hazardous Materials C-3.

Mitigation Measure Hazardous Materials 1-3a: Prior to approving any development at the site, the City of Concord shall require appropriate regulators to make a finding that adequate site remediation or land use restrictions have been completed.

Mitigation Measure Hazardous Materials 1-3(a) is the same as Mitigation Measure Hazardous Materials C-3 (a).

Mitigation Measure Hazardous Materials 1-3b: Prior to approving any development at the site, the City of Concord shall require that new property owners propose the site be deleted or partially deleted from the NPL. With implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 1-3 (b) is the same as Mitigation Measure Hazardous Materials C-3 (b).

Impact Hazardous Materials 1-4: Alternative Concept 1 could result in a conflict of the proposed land use under the alternative concepts and the end land uses determined by the Navy. This impact is considered to be potentially significant.

Approximately 32 percent of the site is proposed to for residential use, much of which is low-density (single-family), and approximately 47 percent of the site is proposed for parks, recreation, and open space. Some of this future land use development is proposed on what is now Site 22, Site 22A, and the Burn Area Site 13. These areas are known to contain either arsenic in the surface soils or in the case of the Burn Area, residual waste from destruction of munitions in the soil. In addition, approximately 8 percent of the land use would be devoted to community facilities, which could include schools, hospitals, or other

municipal functions. Many of the areas proposed for community facilities are located on or adjacent to SWMUs 2 and 7 (PCE groundwater plume), Site 13 (residual waste from destruction of munitions in the soil), and Site 22 (arsenic in soil). Table 10-1 identifies the existing areas at the site that would result in a conflict with proposed land uses under Alternative Concept 1.

Under this alternative concept, the proposed commercial operations covering 6 percent of the site would be consistent with the assumed cleanup standards. The majority of the proposed commercial development would be located north of State Route (SR) 4. Smaller parcels proposed for commercial development would be located throughout the rest of the site.

**Table 10-1:
 Alternative Concept 1 Land Use Conflicts**

Installation Restoration Type	Specific Cleanup Sites of Concern	Proposed Land Uses
Installation Restoration	SWMUs 2, 5, 7	Community Facility
Installation Restoration	Site 22, 22A, 27	Residential, Community Facility
Solid Waste Management Unit	SWMU 13	Residential Community Facility
Munitions (Destruction)	Site 13, 16, 23B, 24A, Burn Area Near HE-58	Residential, Community Facility, Parks/Active Recreation, Open Space

Mitigation Measure Hazardous Materials 1-4: Prior to approving any development at the site, the City of Concord shall require new property owners or appropriate regulators to ensure that the site is cleaned up to unrestricted use standards. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 1-4 is the same as Mitigation Measure Hazardous Materials C-4.

10.3.3.2 Common Hazardous Materials Impacts that are Less Than Significant

Impact Hazardous Materials 1-5: All seven alternative reuse concepts could create a public hazard through transport, use, or disposal of hazardous materials. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 1-5 is the same as Impact Hazardous Materials C-5.

Mitigation Measure Hazardous Materials 1-5: None required.

Impact Hazardous Materials 1-6: All seven alternative reuse concepts would not result in safety hazards near a public or public-use airport or private airstrip. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 1-6 is the same as Impact Hazardous Materials C-6.

Mitigation Measure Hazardous Materials 1-6: None required.

Impact Hazardous Materials 1-7: All seven alternative reuse concepts would not impair implementation of an adopted emergency response or evacuation plan. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 1-7 is the same as Impact Hazardous Materials C-7.

Mitigation Measure Hazardous Materials 1-7: None required.

10.3.4 Hazardous Materials Impacts of Alternative Concept 2

10.3.4.1 Potentially Significant Hazardous Materials Impacts of Alternative Concept 2

Impact Hazardous Materials 2-1: All seven alternative reuse concepts could create a public hazard through upset or accident involving release of hazardous materials. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 2-1 is the same as Impact Hazardous Materials C-1.

Mitigation Measure Hazardous Materials 2-1: Prior to approving any development at the site, the City of Concord shall require new property owners demolish or renovate buildings in accordance with appropriate federal, State, and local regulations addressing exposure to lead based paint on asbestos. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 2-1 is the same as Mitigation Measure Hazardous Materials C-1.

Impact Hazardous Materials 2-2: All seven alternative reuse concepts could emit hazardous emissions or involve handling hazardous materials within ¼ mile of an existing or proposed school. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 2-2 is the same as Impact Hazardous Materials C-2.

Mitigation Measure Hazardous Materials 2-2a: Prior to approving occupancy permits at the site, the City of Concord shall require the new property owners to prepare a Hazardous Materials Management Plan. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 2-2(a) is the same as Mitigation Measure Hazardous Materials C-2 (a).

Mitigation Measure Hazardous Materials 2-2b: Prior to issuing any occupancy permits for development at the site, the City of Concord shall require the remediation of Site 22 to unrestricted use. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 2-2(b) is the same as Mitigation Measure Hazardous Materials C-2 (b). With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Impact Hazardous Materials 2-3: All seven alternative reuse concepts could be located on a site that is listed as hazardous by the Cal-EPA. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 2-3 is the same as Impact Hazardous Materials C-3.

Mitigation Measure Hazardous Materials 2-3a: Prior to approving any development at the site, the City of Concord shall require that appropriate regulatory agenda make a finding that adequate site remediation or land use restrictions have been completed.

Mitigation Measure Hazardous Materials 2-3(a) is the same as Mitigation Measure Hazardous Materials C-3 (a).

Mitigation Measure Hazardous Materials 2-3b: Prior to approving any development at the site, the City of Concord shall require that new property owners propose the site be deleted or partially deleted from the NPL. With implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 2-3(b) is the same as Mitigation Measure Hazardous Materials C-3 (b).

Impact Hazardous Materials 2-4: Alternative Concept 2 could result in a conflict of the proposed land use under the alternative concepts and the end land uses determined by the Navy. This impact is considered to be potentially significant.

This impact would be similar to that discussed under Impact Hazardous Materials 1-4 with some notable differences. Approximately 24 percent of the site would be devoted to residential uses and 52 percent of the site would be devoted to parks, recreation, and open space. Approximately 40 percent of the residential development proposed is to be low-density (single-family) on what is now Site 22 and Site 22A, and approximately 60 percent multi-family (moderate-density) is proposed on or near Site 13. Site 22 is known to contain arsenic in the surface soil and in the case of the Burn Area Site 13, residual waste from destruction of munitions are known to occur in soil. In addition, approximately 9 percent of the land use would be devoted to community facilities, which could include schools, hospitals, or other municipal functions. Many of the areas proposed for community facilities are located on or adjacent to the Burn Area Site 13, (residual waste from destruction of munitions in the soil), SWMU 13 (TCE in groundwater, lead in soil), SWMUs 2 and 7 (PCE

plume in groundwater), and Site 22 (arsenic in soil). Table 10-2 identifies the existing areas at the site that would result in a conflict with proposed land uses under Alternative Concept 2. Mitigation Measure Hazardous Materials 2-4 would reduce the impacts to less than significant.

Under this alternative concept approximately 8 percent of the site would be allowed for commercial uses. The bulk of this commercial area is located near SR-4. A large portion of transit-oriented development is proposed near the proposed North Concord BART Station. Depending upon the construction methods and land use controls, this area could have potentially significant impacts.

**Table 10-2:
 Alternative Concept 2 Land Use Conflicts**

Installation Restoration Type	Specific Cleanup Sites of Concern	Proposed Land Uses
Installation Restoration	SWMUs 2, 5, 7	Community Facility
Installation Restoration	Site 22, 22A, 27	Residential, Community Facility
Solid Waste Management Unit	SWMU 13	Residential Community Facility
Munitions (Destruction)	Site 13, 16, 23B, 24A, Burn Area Near HE-58	Residential, Community Facility, Parks/Active Recreation, Open Space

Mitigation Measure Hazardous Materials 2-4: Prior to approving any development at the site, the City of Concord shall ensure that the site is cleaned up to unrestricted use standards. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 2-4 is the same as Mitigation Measure Hazardous Materials C-4.

10.3.4.2 Common Hazardous Materials Impacts that are Less Than Significant

Impact Hazardous Materials 2-5: All seven alternative reuse concepts could create a public hazard through transport, use, or disposal of hazardous materials. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 2-5 is the same as Impact Hazardous Materials C-5.

Mitigation Measure Hazardous Materials 2-5: None required.

Impact Hazardous Materials 2-6: All seven alternative reuse concepts would not result in safety hazards near a public or public-use airport or private airstrip. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 2-6 is the same as Impact Hazardous Materials C-6.

Mitigation Measure Hazardous Materials 2-6: None required.

Impact Hazardous Materials 2-7: All seven alternative reuse concepts would not impair implementation of an adopted emergency response or evacuation plan. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 2-7 is the same as Impact Hazardous Materials C-7.

Mitigation Measure Hazardous Materials 2-7: None required.

10.3.5 Hazardous Materials Impacts of Alternative Concept 3

10.3.5.1 Potentially Significant Hazardous Materials Impacts of Alternative Concept 3

Impact Hazardous Materials 3-1: All seven alternative reuse concepts could create a public hazard through upset or accident involving release of hazardous materials. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 3-1 is the same as Impact Hazardous Materials C-1.

Mitigation Measure Hazardous Materials 3-1: Prior to approving any development at the site, the City of Concord shall require new property owners demolish or renovate buildings in accordance with appropriate federal, State, and local regulations addressing exposure to lead based paint on asbestos. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 3-1 is the same as Mitigation Measure Hazardous Materials C-1.

Impact Hazardous Materials 3-2: All seven alternative reuse concepts could emit hazardous emissions or involve handling hazardous materials within ¼ mile of an existing or proposed school. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 3-2 is the same as Impact Hazardous Materials C-2.

Mitigation Measure Hazardous Materials 3-2a: Prior to approving occupancy permits at the site, the City of Concord shall require the new property owners to prepare a Hazardous Materials Management Plan. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 3-2(a) is the same as Mitigation Measure Hazardous Materials C-2(a).

Mitigation Measure Hazardous Materials 3-2b: Prior to issuing any occupancy permits for development at the site, the City of Concord shall require the remediation of Site 22 to unrestricted use. With the

implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 3-2(b) is the same as Mitigation Measure Hazardous Materials C-2 (b).

Impact Hazardous Materials 3-3: All seven alternative reuse concepts could be located on a site that is listed as hazardous by the Cal-EPA. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 3-3 is the same as Impact Hazardous Materials C-3.

Mitigation Measure Hazardous Materials 3-3a: Prior to approving any development at the site, the City of Concord shall require appropriate regulators to make a finding that adequate site remediation or land use restrictions have been completed.

Mitigation Measure Hazardous Materials 3-3(a) is the same as Mitigation Measure Hazardous Materials C-3 (a).

Mitigation Measure Hazardous Materials 3-3b: Prior to approving any development at the site, the City of Concord shall require that new property owners propose the site be deleted or partially deleted from the NPL. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 3-3(b) is the same as Mitigation Measure Hazardous Materials C-3 (b).

Impact Hazardous Materials 3-4: Alternative Concept 3 could result in a conflict of the proposed land use under the alternative concepts and the end land uses determined by the Navy. This impact is considered to be potentially significant.

This impact would be similar to that discussed under Impact Hazardous Materials 1-4 with some notable differences. Approximately 21 percent of the site would be devoted to residential uses and approximately 55 percent of the site would be devoted to parks, recreation, and open space. Approximately 41 percent of the residential development proposed is to be low-density (single-family) on what is now Site 22, Site 22A (Group 5), and the Burn Area near HE-58. Approximately 59 percent of multi-family (moderate-density) development is proposed in areas near Site 13 and Site 22. These areas are known to contain arsenic in the surface soil, and in the case of Site 13 and the area near HE-58, residual waste from destruction of munitions are known to be present in the soil. In addition, approximately 10 percent of the land use would be devoted to community facilities, which could include schools, hospitals, or other municipal functions. Many of the areas proposed for community facilities are located on or adjacent to Site 13 (residual waste from destruction of munitions in the soil), SWMU 13 (TCE in groundwater, lead in soil), SWMUs 2 and 7 (PCE plume in groundwater), and Site 22 (arsenic in soil). A potential research or education campus is proposed adjacent to Bailey Road and Site 22A-Group 4 (arsenic in soil). Table 10-3 identifies the existing areas at the site that would result in a conflict with proposed land uses under Alternative Concept 3. Mitigation Measure Hazardous Materials 3-4a would reduce the impacts to less than significant.

Under this alternative concept approximately 7 percent of the site would be allowed for commercial uses. The bulk of this commercial area is located near SR-4. A large portion of transit-oriented development is proposed near the proposed North Concord BART Station. Depending upon the construction methods and land use controls, this area could have potentially significant impacts.

**Table 10-3:
 Alternative Concept 3 Land Use Conflicts**

Installation Restoration Type	Specific Cleanup Sites of Concern	Proposed Land Uses
Installation Restoration	SWMUs 2, 5, 7	Community Facility
Installation Restoration	Site 22, 22A, 27	Residential, Community Facility
Solid Waste Management Unit	SWMU 13	Residential, Community Facility
Munitions (Destruction)	Site 13, 16, 23B, 24A, Burn Area Near HE-58	Residential, Community Facility, Parks/Active Recreation, Open Space

Mitigation Measure Hazardous Materials 3-4: Prior to approving any development at the site, the City of Concord shall ensure that the site is cleaned up to unrestricted use standards. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 3-4 is the same as Mitigation Measure Hazardous Materials C-4.

10.3.5.2 Common Hazardous Materials Impacts that are Less Than Significant

Impact Hazardous Materials 3-5: All seven alternative reuse concepts could create a public hazard through transport, use, or disposal of hazardous materials. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 3-5 is the same as Impact Hazardous Materials C-5.

Mitigation Measure Hazardous Materials 3-5: None required.

Impact Hazardous Materials 3-6: All seven alternative reuse concepts would not result in safety hazards near a public or public-use airport or private airstrip. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 3-6 is the same as Impact Hazardous Materials C-6.

Mitigation Measure Hazardous Materials 3-6: None required.

Impact Hazardous Materials 3-7: All seven alternative reuse concepts would not impair implementation of an adopted emergency response or evacuation plan. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 3-7 is the same as Impact Hazardous Materials C-7.

Mitigation Measure Hazardous Materials 3-7: None required.

10.3.6 Hazardous Materials Impacts of Alternative Concept 4

10.3.6.1 Potentially Significant Hazardous Materials Impacts of Alternative Concept 4

Impact Hazardous Materials 4-1: All seven alternative reuse concepts could create a public hazard through upset or accident involving release of hazardous materials. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 4-1 is the same as Impact Hazardous Materials C-1.

Mitigation Measure Hazardous Materials 4-1: Prior to approving any development at the site, the City of Concord shall require new property owners demolish or renovate buildings in accordance with appropriate federal, State, and local regulations addressing exposure to lead based paint on asbestos. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 4-1 is the same as Mitigation Measure Hazardous Materials C-1.

Impact Hazardous Materials 4-2: All seven alternative reuse concepts could emit hazardous emissions or involve handling hazardous materials within ¼ mile of an existing or proposed school. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 4-2 is the same as Impact Hazardous Materials C-2.

Mitigation Measure Hazardous Materials 4-2a: Prior to approving occupancy permits at the site, the City of Concord shall require the new property owners to prepare a Hazardous Materials Management Plan. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 4-2(a) is the same as Mitigation Measure Hazardous Materials 3-2(a).

Mitigation Measure Hazardous Materials 4-2b: Prior to issuing any occupancy permits for development at the site, the City of Concord shall require the remediation of Site 22 to unrestricted use. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 4-2(b) is the same as Mitigation Measure Hazardous Materials C-2 (b).

Impact Hazardous Materials 4-3: All seven alternative reuse concepts could be located on a site that is listed as hazardous by the Cal-EPA. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 4-3 is the same as Impact Hazardous Materials C-3.

Mitigation Measure Hazardous Materials 4-3a: Prior to approving any development at the site, the City of Concord shall require appropriate regulators to make a finding that adequate site remediation or land use restrictions have been completed.

Mitigation Measure Hazardous Materials 4-3(a) is the same as Mitigation Measure Hazardous Materials C-3 (a).

Mitigation Measure Hazardous Materials 4-3b: Prior to approving any development at the site, the City of Concord shall require that new property owners propose the site be deleted or partially deleted from the NPL. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 4-3(b) is the same as Mitigation Measure Hazardous Materials C-3 (b).

Impact Hazardous Materials 4-4: Alternative Concept 4 could result in a conflict of the proposed land use under the alternative concepts and the end land uses determined by the Navy. This impact is considered to be potentially significant.

This impact would be similar to that discussed under Impact Hazardous Materials 1-4 with some notable differences. Approximately 20 percent of the site would be devoted to residential uses. Approximately 55 percent of the proposed residential land use would accommodate single-family (low-density) development, and would be located on Site 22A (Group 2, south of Willow Pass Road; and Group 5, south of Bailey Road) and the Burn Areas near Site 13 and HE-58. Approximately 45 percent of the proposed residential development would support multi-family (moderate-density) housing and would be located in sections between Willow Pass Road and SR-4. These areas are known to contain arsenic in the surface soil. In the case of the Burn Areas, residual waste from destruction of munitions are known to exist in the soil. While approximately 58 percent, of the site would be slated for parks, active recreation, and open space, and many of the active uses would overlay in these areas of concern. Table 10-4 identifies the existing areas at the site that would result in a conflict with proposed land uses under Alternative Concept 4. Mitigation Measure Hazardous Materials 4-4 would reduce the impacts to less than significant.

Under this alternative concept approximately 7 percent of the site would be allowed for commercial uses. The bulk of this commercial area is located near SR-4. A large portion of transit-oriented development is proposed near the proposed North Concord BART Station. Depending upon the construction methods and land use controls, this area could have potentially significant impacts.

**Table 10-4:
 Alternative Concept 4 Land Use Conflicts**

Installation Restoration Type	Specific Cleanup Sites of Concern	Proposed Land Uses
Installation Restoration	SWMUs 2, 5, 7	Community Facility
Installation Restoration	Site 22, 22A, 27	Residential, Community Facility
Solid Waste Management Unit	SWMU 13	Residential, Community Facility
Munitions (Destruction)	Site 13, 16, 23B, 24A, Burn Area Near HE-58	Residential, Community Facility, Parks/Active Recreation, Open Space

Mitigation Measure Hazardous Materials 4-4: Prior to approving any development at the site, the City of Concord shall ensure that the site is cleaned up to unrestricted use standards. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 4-4 is the same as Mitigation Measure Hazardous Materials C-4.

10.3.6.2 Common Hazardous Materials Impacts that are Less Than Significant

Impact Hazardous Materials 4-5: All seven alternative reuse concepts could create a public hazard through transport, use, or disposal of hazardous materials. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 4-5 is the same as Impact Hazardous Materials C-5.

Mitigation Measure Hazardous Materials 4-5: None required.

Impact Hazardous Materials 4-6: All seven alternative reuse concepts would not result in safety hazards near a public or public-use airport or private airstrip. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 4-6 is the same as Impact Hazardous Materials C-6.

Mitigation Measure Hazardous Materials 4-6: None required.

Impact Hazardous Materials 4-7: All seven alternative reuse concepts would not impair implementation of an adopted emergency response or evacuation plan. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 4-7 is the same as Impact Hazardous Materials C-7.

Mitigation Measure Hazardous Materials 4-7: None required.

10.3.7 Hazardous Materials Impacts of Alternative Concept 5

10.3.7.1 Potentially Significant Hazardous Materials Impacts of Alternative Concept 5

Impact Hazardous Materials 5-1: All seven alternative reuse concepts could create a public hazard through upset or accident involving release of hazardous materials. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 5-1 is the same as Impact Hazardous Materials C-1.

Mitigation Measure Hazardous Materials 5-1: Prior to approving any development at the site, the City of Concord shall require new property owners demolish or renovate buildings in accordance with appropriate federal, State, and local regulations addressing exposure to lead based paint on asbestos. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Impact Hazardous Materials 5-2: All seven alternative reuse concepts could emit hazardous emissions or involve handling hazardous materials within ¼ mile of an existing or proposed school. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 5-2 is the same as Impact Hazardous Materials C-2.

Mitigation Measure Hazardous Materials 5-2a: Prior to approving occupancy permits at the site, the City of Concord shall require the new property owners to prepare a Hazardous Materials Management Plan. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 5-2(a) is the same as Mitigation Measure Hazardous Materials C-2(a).

Mitigation Measure Hazardous Materials 5-2b: Prior to issuing any occupancy permits for development at the site, the City of Concord shall require the remediation of Site 22 to unrestricted use. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 5-2(b) is the same as Mitigation Measure Hazardous Materials C-2 (b).

Impact Hazardous Materials 5-3: All seven alternative reuse concepts could be located on a site that is listed as hazardous by the Cal-EPA. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 3-3 is the same as Impact Hazardous Materials C-3.

Mitigation Measure Hazardous Materials 5-3a: Prior to approving any development at the site, the City of Concord shall require appropriate regulators to make a finding that adequate site remediation or land use restrictions have been completed.

Mitigation Measure Hazardous Materials 5-3(a) is the same as Mitigation Measure Hazardous Materials C-3 (a).

Mitigation Measure Hazardous Materials 5-3b: Prior to approving any development at the site, the City of Concord shall require that new property owners propose the site be deleted or partially deleted from the NPL. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 5-3(b) is the same as Mitigation Measure Hazardous Materials C-3 (b).

Impact Hazardous Materials 5-4: Alternative Concept 5 could result in a conflict of the proposed land use under the alternative concepts and the end land uses determined by the Navy. This impact is considered to be potentially significant.

This impact would be similar to that discussed under Impact Hazardous Materials 1-1 with some notable differences. Approximately 13 percent of the site would be devoted to residential uses. Most of the proposed development would occur to the north of Willow Pass Road, including approximately 73 percent multi-family (moderate-density) uses located on and near Site 13 (residual waste from destruction of munitions in the soil) and near SWMUs 2, 5, and 7 (PCE groundwater plume). Approximately 27 percent single-family (low-density) uses would be located on Site 22A (arsenic in soil). The rest of the site to the south of Willow Pass Road, approximately 71 percent of the site, would be designated open space, parks/active recreation, and riparian corridor. Some of the active and passive parks and recreation facilities would overlay on areas of concern such as Site 22, 22A and Burn Area HE-58. Table 10-5 identifies the existing areas at the site that would result in a conflict with proposed land uses under Alternative Concept 5. Mitigation Measure Hazardous Materials 5-4 would reduce the impacts to less than significant.

**Table 10-5:
 Alternative Concept 5 Land Use Conflicts**

Installation Restoration Type	Specific Cleanup Sites of Concern	Proposed Land Uses
Installation Restoration	SWMUs 2, 5, 7	Residential
Installation Restoration	Sites 22, 22A	Residential, Open Space, Parks/Active Recreation
Solid Waste Management Unit	SWMU 13	Parks/Active Recreation
Munitions (Destruction)	Sites 13, 16, 23B, 24A, Burn Area Near HE-58	Residential, Parks/Active Recreation, Community Facility, Open Space

Under this alternative concept approximately 4 percent of the site would be allowed for commercial uses. The bulk of this commercial area is located north SR-4. A large portion of transit-oriented development is proposed near the proposed North Concord BART Station. Depending upon the construction methods and land use controls, this area could have potentially significant impacts.

Mitigation Measure Hazardous Materials 5-4: Prior to approving any development at the site, the City of Concord shall ensure that the site is cleaned up to unrestricted use standards. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 5-4 is the same as Mitigation Measure Hazardous Materials C-4.

10.3.7.2 Common Hazardous Materials Impacts that are Less Than Significant

Impact Hazardous Materials 5-5: All seven alternative reuse concepts could create a public hazard through transport, use, or disposal of hazardous materials. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 5-5 is the same as Impact Hazardous Materials C-5.

Mitigation Measure Hazardous Materials 5-5: None required.

Impact Hazardous Materials 5-6: All seven alternative reuse concepts would not result in safety hazards near a public or public-use airport or private airstrip. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 5-6 is the same as Impact Hazardous Materials C-6.

Mitigation Measure Hazardous Materials 5-6: None required.

Impact Hazardous Materials 5-7: All seven alternative reuse concepts would not impair implementation of an adopted emergency response or evacuation plan. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 5-7 is the same as Impact Hazardous Materials C-7.

Mitigation Measure Hazardous Materials 5-7: None required.

10.3.8 Hazards and Hazardous Materials Impacts of Alternative Concept 6

10.3.8.1 Potentially Significant Hazardous Materials Impacts of Alternative Concept 6

Impact Hazardous Materials 6-1: All seven alternative reuse concepts could create a public hazard through upset or accident involving release of hazardous materials. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 6-1 is the same as Impact Hazardous Materials C-1.

Mitigation Measure Hazardous Materials 6-1: Prior to approving any development at the site, the City of Concord shall require new property owners demolish or renovate buildings in accordance with appropriate federal, State, and local regulations addressing exposure to lead based paint on asbestos. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 6-1 is the same as Mitigation Measure Hazardous Materials C-1.

Impact Hazardous Materials 6-2: All seven alternative reuse concepts could emit hazardous emissions or involve handling hazardous materials within ¼ mile of an existing or proposed school. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 6-2 is the same as Impact Hazardous Materials C-2.

Mitigation Measure Hazardous Materials 6-2a: Prior to approving occupancy permits at the site, the City of Concord shall require the new property owners to prepare a Hazardous Materials Management Plan. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 6-2(a) is the same as Mitigation Measure Hazardous Materials C-2 (a).

Mitigation Measure Hazardous Materials 6-2b: Prior to issuing any occupancy permits for development at the site, the City of Concord shall require the continued remediation at Site 22. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 6-2(b) is the same as Mitigation Measure Hazardous Materials C-2 (b).

Impact Hazardous Materials 6-3: All seven alternative reuse concepts could be located on a site that is listed as hazardous by the Cal-EPA. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 6-3 is the same as Impact Hazardous Materials C-3.

Mitigation Measure Hazardous Materials 6-3a: Prior to approving any development at the site, the City of Concord shall require appropriate regulators to make a finding that adequate site remediation or land use restrictions have been completed.

Mitigation Measure Hazardous Materials 6-3(a) is the same as Mitigation Measure Hazardous Materials C-3 (a).

Mitigation Measure Hazardous Materials 6-3b: Prior to approving any development at the site, the City of Concord shall require that new property owners propose the site be deleted or partially deleted from the NPL. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 6-3(b) is the same as Mitigation Measure Hazardous Materials C-3 (b).

Impact Hazardous Materials 6-4: Alternative Concept 6 could result in a conflict of the proposed land use under the alternative concepts and the end land uses determined by the Navy. This impact is considered to be potentially significant.

This impact would be similar to that discussed under Impact Hazardous Materials 1-4 with some notable differences. Approximately 12 percent of the site would be devoted to residential uses. Approximately 70 percent of the proposed residential land use would support multi-family (moderate-density) development and would be located in sections north of Willow Pass Road. Some of these areas would be located on Site 22, which is known to contain arsenic in the soil. Approximately 30 percent of the site slated for residential development would accommodate single-family (low-density) housing including siting on Site 22, SWMU 13 (TCE in groundwater and lead in soil), and Site 13 (residual waste from destruction of munitions in the soil). Approximately 72 percent of the site would be slated for parks, recreation, and open space, and covers most of the areas east of Mt. Diablo Creek. However, active and passive recreation facilities would overlay on areas of concern such as Site 22, 22A and Burn Area HE-58. Table 10-6 identifies the existing areas at the site that would result in a conflict with proposed land uses under Alternative Concept 6. Mitigation Measure Hazardous Materials 6-4 would reduce the impacts to less than significant.

**Table 10-6:
 Alternative Concept 6 Land Use Conflicts**

Installation Restoration Type	Specific Cleanup Sites of Concern	Proposed Land Uses
Installation Restoration	SWMUs 2, 5, 7	Community Facility, Parks/Active Recreation
Installation Restoration	Sites 22, 22A, 27	Residential, Community Facility, Open Space
Solid Waste Management Unit	SWMU 13	Community Facility, Residential
Munitions (Destruction)	Sites 13, 16, 23B, 24A, Burn Area Near HE-58	Residential, Parks/Active Recreation, Community Facility, Open Space

Under this alternative concept approximately 5 percent of the site would be allowed for commercial uses. The bulk of this commercial area is located north of SR-4. A large portion of transit-oriented development is proposed near the proposed North Concord BART Station. Depending upon the construction methods and land use controls, this area could have potentially significant impacts.

Mitigation Measure Hazardous Materials 6-4: Prior to approving any development at the site, the City of Concord shall ensure that the site is cleaned up to unrestricted use standards. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 6-4 is the same as Mitigation Measure Hazardous Materials C-4.

10.3.8.2 Common Hazardous Materials Impacts that are Less Than Significant

Impact Hazardous Materials 6-5: All seven alternative reuse concepts could create a public hazard through transport, use, or disposal of hazardous materials. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 6-5 is the same as Impact Hazardous Materials C-5.

Mitigation Measure Hazardous Materials 6-5: None required.

Impact Hazardous Materials 6-6: All seven alternative reuse concepts would not result in safety hazards near a public or public-use airport or private airstrip. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 6-6 is the same as Impact Hazardous Materials C-6.

Mitigation Measure Hazardous Materials 6-6: None required.

Impact Hazardous Materials 6-7: All seven alternative reuse concepts would not impair implementation of an adopted emergency response or evacuation plan. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 6-7 is the same as Impact Hazardous Materials C-7.

Mitigation Measure Hazardous Materials 6-7: None required.

10.3.9 Hazards and Hazardous Materials Impacts of Alternative Concept 7

10.3.9.1 Potentially Significant Hazardous Materials Impacts of Alternative Concept 7

Impact Hazardous Materials 7-1: All seven alternative reuse concepts could create a public hazard through upset or accident involving release of hazardous materials. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 7-1 is the same as Impact Hazardous Materials C-1.

Mitigation Measure Hazardous Materials 7-1: Prior to approving any development at the site, the City of Concord shall require new property owners demolish or renovate buildings in accordance with appropriate federal, State, and local regulations addressing exposure to lead based paint on asbestos. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 7-1 is the same as Mitigation Measure Hazardous Materials C-1.

Impact Hazardous Materials 7-2: All seven alternative reuse concepts could emit hazardous emissions or involve handling hazardous materials within ¼ mile of an existing or proposed school. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 7-2 is the same as Impact Hazardous Materials C-2.

Mitigation Measure Hazardous Materials 7-2a: Prior to approving occupancy permits at the site, the City of Concord shall require the new property owners to prepare a Hazardous Materials Management Plan. With the implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 7-2(a) is the same as Mitigation Measure Hazardous Materials C-2 (a).

Mitigation Measure Hazardous Materials 7-2b: Prior to issuing any occupancy permits for development at the site, the City of Concord shall require the remediation of Site 22 to unrestricted use. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 7-2(b) is the same as Mitigation Measure Hazardous Materials C-2 (b).

Impact Hazardous Materials 7-3: All seven alternative reuse concepts could be located on a site that is listed as hazardous by the Cal-EPA. This impact is considered to be potentially significant.

The analysis of Impact Hazardous Materials 7-3 is the same as Impact Hazardous Materials C-3.

Mitigation Measure Hazardous Materials 7-3a: Prior to approving any development at the site, the City of Concord shall require appropriate regulators to make a finding that adequate site remediation or land use restrictions have been completed.

Mitigation Measure Hazardous Materials 7-3(a) is the same as Mitigation Measure Hazardous Materials C-3 (a).

Mitigation Measure Hazardous Materials 7-3b: Prior to approving any development at the site, the City of Concord shall require that new property owners propose the site be deleted or partially deleted from the NPL. With the implementation of these mitigation measures, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 7-3(b) is the same as Mitigation Measure Hazardous Materials C-3 (b).

Impact Hazardous Materials 7-4: Alternative Concept 7 could result in a conflict of the proposed land use under the alternative concepts and the end land uses determined by the Navy. This impact is considered to be potentially significant.

This impact would be similar to that discussed under Impact Hazardous Materials 1-1 with some notable differences. Approximately 10 percent of the proposed developed area would be devoted to residential uses. All of the development would occur north of Willow Pass Road. Approximately 40 percent of the proposed residential development area would accommodate single-family (low-density) housing, and would overlap Burn Area Site 13 (residual waste from destruction of munitions in the soil) designated areas of concern. The remaining 60 percent of property proposed for residential development would support multi-family (moderate-density) housing to be located in sections of SWMUs 2, 5, and 7 (PCE groundwater plume). Community facilities could also potentially conflict with Burn Area Site 13. The majority, approximately 81 percent, of the site is proposed for active and passive parks and recreation, and open space. However, active and passive recreation facilities would overlay on areas of concern such as Site 22, 22A, SWMU 15 and Burn Area Sites 13 and HE-58. Table 10-7 identifies the existing areas at the site that would result in a conflict with proposed land uses under Alternative Concept 7. Mitigation Measure Hazardous Materials 7-4 would reduce the impacts to less than significant.

**Table 10-7:
 Alternative Concept 7 Land Use Conflicts**

Installation Restoration Type	Specific Cleanup Sites of Concern	Proposed Land Uses
Installation Restoration	SWMUs 2, 5, 7	Residential, Community Facility
Installation Restoration	Sites 22, 22A, 27	Open Space, Parks/Active Recreation
Solid Waste Management Unit	SWMU 13	Open Space, Parks/Active Recreation
Munitions (Destruction)	Sites 13, 16, 23B, 24A, Burn Area Near HE-58	Residential, Parks/Active Recreation, Open Space

Although it is assumed that property would be remediated to the appropriate levels prior to land development, development activities have the potential upset or accident.

Under this alternative concept approximately 3 percent of the site would be allowed for commercial uses. The bulk of this commercial area is located north of SR-4. A large portion of transit-oriented development is proposed near the proposed North Concord BART

Station. Depending upon the construction methods and land use controls, this area could have potentially significant impacts.

Mitigation Measure Hazardous Materials 7-4: Prior to approving any development at the site, the City of Concord shall ensure that the site is cleaned up to unrestricted use standards. With implementation of this mitigation measure, this potentially significant impact would be reduced to a level that is less than significant.

Mitigation Measure Hazardous Materials 7-4 is the same as Mitigation Measure Hazardous Materials C-4.

10.3.9.2 Common Hazardous Materials Impacts that are Less Than Significant

Impact Hazardous Materials 7-5: All seven alternative reuse concepts could create a public hazard through transport, use, or disposal of hazardous materials. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 7-5 is the same as Impact Hazardous Materials C-5.

Mitigation Measure Hazardous Materials 7-5: None required.

Impact Hazardous Materials 7-6: All seven alternative reuse concepts would not result in safety hazards near a public or public-use airport or private airstrip. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 4-7 is the same as Impact Hazardous Materials C-6.

Mitigation Measure Hazardous Materials 7-6: None required.

Impact Hazardous Materials 7-7: All seven alternative reuse concepts would not impair implementation of an adopted emergency response or evacuation plan. This impact is considered to be less than significant.

The analysis of Impact Hazardous Materials 7-7 is the same as Impact Hazardous Materials C-7.

Mitigation Measure Hazardous Materials 7-7: None required.

10.3.10 Hazards and Hazardous Materials “No Project” (NP) Alternative

10.3.10.1 Potentially Significant Hazardous Materials Impacts of Alternative Concept – No Project

Impact Hazardous Materials NP-1: With “No Project” alternative, the Navy would continue to remediate contamination areas of concern. This impact is considered to be less than significant. Under the No Project Alternative, the site would be remediated over time to the land use standards identified in the Navy’s FS. The current Hazardous Materials Business Plan would be maintained to include all onsite hazardous materials. The general public will continue to be excluded from the site, and existing cattle grazing would continue, as determined by the Navy. Ongoing remediation activities would use standard

BMPs and other reasonable care to prevent accidents, spills of potentially hazardous materials, or other avoidable risks to the public and the environment.

Mitigation Measure Hazardous Materials NP-1: None required.

10.3.10.2 Common Hazardous Materials Impacts that are Less Than Significant

Impact Hazardous Materials NP-2: All seven alternative reuse concepts could create a public hazard through transport, use, or disposal of hazardous materials. This impact is considered to be less than significant.

Mitigation Measure Hazardous Materials NP-2: None required.

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