

# **Appendix D**

Screening Level Environmental Site Assessment

Ravenswood/Four Corners Specific Plan Update SEIR

<b>TYPE OF SERVICES</b>	Screening Level Environmental Site Assessment
<b>LOCATION</b>	Ravenswood Business District/4 Corners Transit-Oriented Development Specific Plan Update East Palo Alto, California
<b>CLIENT</b>	David J. Powers & Associates 1871 The Alameda, Suite 200 San Jose, California 95126
<b>PROJECT NUMBER</b>	118-149-1
<b>DATE</b>	March 13, 2023



ENVIRONMENTAL

<b>Type of Services</b>	<b>Screening Level Environmental Site Assessment</b>
<b>Location</b>	<b>Ravenswood Business District /4 Corners Transit-Oriented Development Specific Plan Update East Palo Alto, California</b>
<b>Client</b> <b>Client Address</b>	<b>David J. Powers &amp; Associates 1871 The Alameda, Suite 200 San Jose, California 95126</b>
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<b>Type of Services</b>	<b>Screening Level Environmental Site Assessment</b>
<b>Location</b>	<b>Ravenswood Business District / 4 Corners Transit-Oriented Development Specific Plan Update East Palo Alto, California</b>

## **SECTION 1: INTRODUCTION**

This report presents the results of the Screening Level Environmental Site Assessment (ESA) performed for properties within the approximately 207-acre Ravenswood Business District / 4 Corners Transit-Oriented Development (TOD) Specific Plan Update area located in the northeastern portion of East Palo Alto, California (Site) as shown on Figures 1 and 2. This work was performed for David J. Powers & Associates in accordance with our agreement dated January 20, 2023 (Agreement).

### **1.1 PROJECT DESCRIPTION/BACKGROUND**

We understand that David J. Powers & Associates is providing CEQA consulting services to facilitate preparation of the Ravenswood Business District / 4 Corners TOD Specific Plan Update. The City adopted the existing Ravenswood Specific Plan in 2013, which provides a policy and regulatory framework for reviewing development projects and public improvements in the Specific Plan area. The proposed Specific Plan Update would increase the total amount of development allowed within the Specific Plan area by increasing the maximum square footages for office, R&D/life science, light industrial, civic/community, and tenant amenity, and the total number of residential units allowed under the Specific Plan.

### **1.2 PURPOSE AND SCOPE OF WORK**

The purpose of this investigation was to evaluate the presence of documented hazardous substance releases at the Site and in the Site vicinity and to provide an assessment of potential impacts to current and future Site uses. As presented in our Agreement, the scope of work performed for this Screening Level ESA included the following:

- Review of selected documents obtained from the state Geotracker (<http://geotracker.waterboards.ca.gov>) and Envirostor (<http://www.envirostor.dtsc.ca.gov>) databases to obtain information regarding reported on-Site and nearby spill incidents.
- Preparation of a written report summarizing our findings and recommendations.

The limitations for the Screening Level ESA are presented in Section 4.

**SECTION 2: GEOTRACKER AND ENVIROSTOR DOCUMENT REVIEW**

To obtain information regarding documented spill incidents in the Site vicinity, a cursory review of readily available documents obtained from the state Geotracker (<http://geotracker.swrcb.ca.gov>) and Envirostor (<http://www.envirostor.dtsc.ca.gov>) databases was performed. Geotracker is a database and geographic information system (GIS) that provides online access to environmental data. It tracks regulatory data about leaking underground storage tank (LUST), Department of Defense, Site Cleanup Program and Landfill facilities. The Envirostor database is maintained by the Department of Toxic Substances Control (DTSC) and contains information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted or have been completed under DTSC’s oversight. The Envirostor database includes the following facility types: Federal Superfund sites; State Response sites; Voluntary Cleanup sites; and School sites.

Reported on-Site spill incidents are identified in Table 1. The locations of on-Site properties at which spill incidents have been reported (*i.e.*, reported LUST and cleanup program site [CPS] cases) are depicted on Figure 2.

**Table 1. Summary of Reported On-Site Spill Incidents**

ID*	Facility Name and Address	Comments
<b>Open Cleanup Program Sites</b>		
	<b>Sycamore Real Estate Investments</b> (Multiple addresses)	Sycamore Real Estate Investments is listed as a multi-property CPS case (open Case ID T10000019768) consisting of the following seven separate CPS cases.  An “Area-Wide Risk Management Plan” (Ninyo & Moore, 2021) that is applicable to each of these properties has been prepared and approved by the Water Board. Additionally, a Land Use Covenant was recorded in 2022 that, among other provisions, restricts certain uses and activities at the properties unless approved by the Water Board. Separate Land Use Covenants also were previously recorded for some of the individual properties (151 Tara Road, 264 Tara Road, and 2555/2565 Pulgas Avenue) and are concurrently applicable.
1	<b>Sycamore Real Estate Investments</b> 391 Demeter Street	Listed as an open case on the CPS database.
2	<b>Sycamore Real Estate Investments</b> 350 Demeter Street	Listed as an open case on the CPS database.
3	<b>Sycamore Real Estate Investments</b> 230 Demeter Street	Listed as an open case on the CPS database.
4	<b>Sycamore Real Estate Investments</b> 2535 Pulgas Avenue	Listed as an open case on the CPS database. Also listed as Touchatt Trucking on the LUST database as a closed case.
5	<b>Sycamore Real Estate Investments</b> 2555/2565 Pulgas Avenue	Listed as part of the Sycamore Real Estate Investments multi-property CPS case (open Case ID T10000019768). Also, listed as a closed case on the CPS database (closed Case ID SL0608186716).
6	<b>Sycamore Real Estate Investments</b> 151 Tara Road	Listed as an open case on the CPS database.
7	<b>Sycamore Real Estate Investments</b> 264 Tara Road	Listed as an open case on the CPS database.

8	<b>Romic Environmental Technologies</b> 2081 Bay Road	Listed as an open case on the CPS database. The Romic facility historically was used as a hazardous waste management facility whose services included solvent recycling, fuel blending, wastewater treatment, and hazardous waste storage and treatment. During facility operations conducted by Romic and its predecessor companies, soil, soil vapor and groundwater were contaminated at the Site. The primary contaminants of concern are chlorinated and aromatic volatile organic compounds (VOCs). Other contaminants are also present, including metals (e.g. lead), polychlorinated biphenyls (PCBs), petroleum hydrocarbons, and semi-VOCs.
11	<b>2519 Pulgas (aka., Iwasaki Nursery)</b> 2519 Pulgas Avenue	Listed as an open case on the CPS database. This property is the northern portion of the former Iwasaki Nursery, which also is listed as a closed case on the LUST database.
13	<b>Pick &amp; Save Auto Wreckers</b> 1985 Bay Road	Listed as an open case on the CPS database.
15	<b>1801-1805 Bay Road</b> 1801-1805 Bay Road	Listed as an open case on the CPS database. Electrite Company Inc. at 1805 Bay Road also is listed as a closed case on the LUST database.
19	<b>Midpen Housing Corp.</b> 965 Weeks Street	Listed as an open case on the CPS database.
20	<b>Pulgas and Bay</b> (Multiple addresses)	<p>The Pulgas and Bay property consists of multiple parcels located west of Pulgas Avenue that now are subdivided into 51 individual parcels developed with single family homes, as well as parcels located east of Pulgas Avenue including the EPACENTER (Youth Art &amp; Music Center) and the proposed public library parcel (APN 063-240-490).</p> <p>The Pulgas and Bay parcels are listed as an open case on the CPS database.</p> <p>East Palo Alto Youth Arts and Music Center at 1950 Bay Road is listed as a separate open case on the CPS database.</p> <p>A portion of the residential area west of Pulgas Avenue also is listed as closed case on the LUST database (Peck &amp; Hiller, 2479 Pulgas Avenue).</p>
21	<b>Rhone-Poulenc</b> 1990 Bay Road	Listed as an open case on the CPS database. Rhone-Poulenc and predecessors at 1990 Bay Road operated a sodium arsenate herbicide and pesticide formulation and production facility from about 1926 to 1971. In 2001, the property was transferred to StarLink Logistics, Inc. (SLLI), a successor to Rhône-Poulenc. Investigations starting in the 1980s identified arsenic soil contamination on the 1990 Bay Road property and at properties in the vicinity.
22	<b>Upland Operable Unit</b>	
23	<b>Upland Operable Unit Annex</b> <b>South of Weeks Street Subarea</b>	
26	<b>Former Call-Mac Transportation</b> 1175 Weeks Street	Listed as an open case on the CPS database.
27	<b>Primary School</b> 1200 Weeks Street	Listed as an open case on the CPS database.
<b>Closed Cleanup Program Sites</b>		
9	<b>Global Steel</b> 255 Demeter Street	Listed as a closed case on the CPS database.
12	<b>Ravenswood Family Health Clinic (aka., Iwasaki Nursery)</b> 1885 Bay Road	Listed as a closed case on the CPS database. This property formerly was the southern portion of the Iwasaki Nursery at 2519 Pulgas Avenue, which also is listed as a closed case on the LUST database.
17	<b>Former Rail Spur - Bay to Pulgas Section</b>	Listed as a closed case on the CPS database.
18	<b>Ravenswood Family Health Center</b> 1802-1804 Bay Road	Listed as a closed case on the CPS database.

Open LUST Cases		
10	<b>Peninsula Charter Lines</b> 160 Demeter Street	Listed as an open case on the LUST database. A former LUST case at the property was closed by the San Mateo County Department of Environmental Health (DEH) in 2004**. The current case was opened following UST removal activities in 2001.
Closed LUST Cases		
14	<b>Bay Area Auto Wreckers</b> 2017 Bay Road	Each of the on-Site LUST cases listed to the left is identified as being closed. However, residual contaminant concentrations potentially remain at each of these properties.
16**	<b>Ibrahim Property</b> 2395 University Avenue	
24**	<b>Pitcher Drilling</b> 2447 Pulgas Avenue	
25	<b>R.E. Borrmann Steel Co.</b> 2450 Pulgas Avenue	

\* See Figure 2

\*\* Site management requirements were stipulated in the regulatory agency case closure documentation that consisted of the following (or substantially similar) language: *As a result of residual contaminant concentrations, changes in land use or removal of soil and groundwater from the affected area may create a risk. Therefore, any proposed change in land use or proposed soil or groundwater removal activity at the subject site must be submitted to the San Mateo County Groundwater Protection Program (GPP) for our review under government code section 65850.2 so we can evaluate whether the residual contaminates will likely pose a risk to public health and the environment if the proposed activities are implemented.*

## 2.1 WATER BOARD ORDERS 92-037 AND 92-086 (RAVENSWOOD INDUSTRIAL AREA)

A large portion of the Site is located within an area referred to as the Ravenswood Industrial Area (RIA), which consists of on-Site parcels located north of Weeks Street and east of Clark Avenue and Illinois Street. The RIA has historically been used for agricultural activities and a variety of industrial purposes. Pollutant releases were identified during the 1980s at the Romic Chemical (1981 Bay Road) and Rhone-Poulenc (1990 Bay Road) properties. In addition, multiple auto salvage yards within the RIA, with their poor chemical handling practices, led many to believe the RIA was significantly impacted by pollutants. In an effort to revitalize the RIA, the East Palo Alto Redevelopment Agency in late 1980s designated it as a “redevelopment project area”, invoking redevelopment authority. To abate water quality and environmental impacts, as well as assist East Palo Alto in their efforts, the Water Board adopted Site Cleanup Requirements for the RIA in 1992. These Orders (Nos. 92-037 and 92-086) set forth tasks to: 1) conduct site use histories of the properties, 2) prepare workplans for investigations, and 3) submit the results of investigations and propose additional investigations necessary. Copies of these Orders are attached in Appendix A.

Property owners prepared site use histories and workplans for investigation for their individual properties. A lack of funds prevented many of the individual property owners from completing the required investigations. The desire of the East Palo Alto Redevelopment Agency to revitalize the RIA led the USEPA, as part of a Regional Brownfield Pilot Project, to implement an area wide soil and groundwater investigation in 1995 within the RIA. While not as detailed as that proposed by each of the individual property owners, the investigation was adequate to gauge the general magnitude of the conditions within the RIA.

The results of the 1995 investigation found that the RIA (not including the Romic or Rhone-Poulenc facilities) was not as significantly impacted as previously thought. In general, it was concluded that additional assessment and needed remediation activities could be conducted concurrent with and funded by the redevelopment of the individual properties, and that the RIA as a whole did not pose a significant threat to human health or the environment in its then current commercial/industrial land use setting.

At some properties within RIA, redevelopment activities and property transactions have prompted further investigations to evaluate the extent to which past uses had impacted soil, soil vapor, and/or groundwater quality, and to comply with the Site Cleanup Requirements adopted by the Water Board (Orders 92-037 and 92-086). Remedial work and in some cases redevelopment activities have been completed at several properties under regulatory agency oversight (e.g., the closed LUST and CPS cases listed in Table 1). At other properties, investigations and/or monitoring activities are in progress, or have not yet been initiated.

## **2.2 LAND USE COVENANTS**

Land Use Covenants (LUCs) are used when an overseeing regulatory agency has determined that it is safe to leave specific types of contamination at a property as long as adherence to defined restrictions is maintained. These restrictions typically are supported by toxicological evaluation or screening. Common LUC provisions include stating that a remedial system should not be disturbed, prohibiting soil disturbance, or disallowing sensitive uses like residences, schools, day care facilities or hospitals. Provisions of a LUC typically remain in effect until they are removed or modified with approval of the overseeing regulatory agency.

Covenant and Environmental Restrictions (Land Use Covenants) have been recorded with San Mateo County for multiple on-Site properties. The on-Site properties that are subject to LUCs are depicted on Figure 3.

## **SECTION 3: CONCLUSIONS (FINDINGS) AND RECOMMENDATIONS**

Cornerstone performed this Screening Level ESA to support David J. Powers & Associates in evaluation of the general environmental setting of the Site. Our conclusions and recommendations are summarized below.

### **3.1 SITE HISTORY AND REPORTED SPILL INCIDENTS**

Based on the information obtained during this study, the Site has historically been used for agricultural activities, residences, and a variety of commercial and industrial purposes. As is common in commercial/industrial areas, multiple on-Site businesses have handled and stored hazardous substances.

As summarized in Table 1 and depicted on Figure 2, spill incidents have been reported at multiple on-Site properties that have impacted soil, soil vapor and/or groundwater. In general, identified contaminants have included VOCs, semi-VOCs, pesticides, petroleum hydrocarbons, metals and/or PCBs. Some of the associated LUST and CPS cases have been closed by the overseeing regulatory agencies. Other cases remain open; at these parcels, characterization, monitoring and/or remediation activities are on-going and are being conducted under regulatory

agency oversight (*i.e.*, Water Board, County DEH, Department of Toxic Substances Control [DTSC] and/or US EPA).

At the closed LUST and CPS case locations, residual contamination may remain in soil, soil vapor and/or groundwater. For several of the closed LUST cases, site management requirements were established by the overseeing regulatory agencies (see Table 1 footnote). Compliance with the established site management requirements should be maintained.

Note that risk-based screening levels published by regulatory agencies are routinely reviewed and revised as new scientific information becomes available. The general trend is that contaminant concentrations that are considered to be acceptable often are lowered (*i.e.*, become more health-protective) over time. This is particularly the case in recent years with soil vapor screening levels. Due to these changes in regulatory guidance, some of the screening levels and/or cleanup goals previously utilized to support LUST and CPS case closures may no longer be appropriate in certain development scenarios. Thus, even for the closed LUST and CPS cases for which no Site management requirements were established, we recommend that remaining residual contaminant concentrations (if any) be compared to current screening levels to evaluate if additional sampling, health risk assessment, and/or remedial measures may be warranted prior to future development.

At parcels with open LUST or CPS cases, and those within the RIA that are subject to Water Board Orders 92-037 and 92-086, any planned redevelopment activities should be coordinated with the overseeing regulatory agencies.

For many of the on-Site parcels, as depicted on Figure 3, Land Use Covenants have been established that restrict certain uses and activities at the properties unless approved by the overseeing regulatory agency. Compliance with the provisions of existing Land Use Covenants should be maintained.

### **3.2 RECOMMENDED PROPERTY-SPECIFIC STUDIES AND PLANS**

Prior to redevelopment of Site parcels, a property-specific Phase I ESA should be completed in accordance with ASTM Standard Designation E 1527-21 (or most recent version) to identify Recognized Environmental Conditions<sup>1</sup>, evaluate the property history, and establish if the property is likely to have been impacted by chemical releases. Soil, soil vapor and/or groundwater quality studies should subsequently be conducted, if warranted based on the findings of the property-specific Phase I ESAs, to evaluate if remedial measures are needed to protect the health and safety of Site occupants and construction workers.

Prior to the start of earthwork activities (*e.g.*, excavation, trenching, grading, etc.) on properties with known contaminants of concern (COC) exceeding the lower of the then-current DTSC, Water Board or US EPA residential screening levels<sup>2</sup>, an appropriate corrective action/risk

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<sup>1</sup> As defined by ASTM E1527-21, the term Recognized Environmental Condition means 1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; 2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or 3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.

<sup>2</sup> Note that naturally occurring background concentrations of some metals may exceed their respective screening levels. Regulatory agencies generally do not require cleanup of contaminants in soil to below background levels. For some metals, Site specific background levels commonly are substituted for the published screening levels.

management plan (e.g. RAP, removal action workplan [RAW] or Site Management Plan [SMP], etc.) should be prepared that reflects the results of the on-Site investigations. The corrective action/risk management plan should describe measures necessary to protect the health and safety of future Site occupants, and establish appropriate management practices for handling and monitoring of impacted soil, soil vapor and groundwater that potentially may be encountered during construction activities. The corrective action/risk management plan should be prepared by an Environmental Professional and be submitted to an appropriate overseeing regulatory agency (e.g., DEH, DTSC or Water Board) for review. Regulatory agency approval should be obtained prior to commencing earthwork activities. A Health and Safety Plan (HSP) also should be prepared to establish health and safety protocols for personnel working at the Site. All remedial measures should be completed under regulatory agency oversight and meet all applicable federal, state and local laws, regulations and requirements. Following completion, a report documenting compliance with the provisions of the corrective action/risk management plan and describing the work completed should be submitted to and approved by the overseeing regulatory agency.

### **3.3 LEAD-BASED PAINT**

In 1978, the Consumer Product Safety Commission banned lead-containing paints and coatings sold for consumer use. Some lead-containing products, such as industrial coatings, however, are still allowed. Based on the age of many of the existing buildings, lead-containing paint may be present. If demolition is planned, the removal of lead-containing paint is not required if it is bonded to the building materials. However, if the lead-containing paint is flaking, peeling, or blistering, it should be removed prior to demolition. In either case, applicable OSHA regulations must be followed; these include requirements for worker training, air monitoring and dust control, among others. Any debris or soil containing lead must be disposed appropriately.

### **3.4 ASBESTOS AND OTHER HAZARDOUS BUILDING MATERIALS**

Due to the age of many of the on-Site structures, building materials may contain asbestos. If demolition, renovation, or re-roofing of a building is planned, an asbestos survey is required by local authorities and/or National Emissions Standards for Hazardous Air Pollutants (NESHAP) guidelines. NESHAP guidelines require the removal of potentially friable asbestos containing building materials prior to building demolition or renovation that may disturb these materials.

Some components encountered as part of a building demolition waste stream may contain hazardous materials. Universal wastes, lubrication fluids and refrigerants should be removed before structural demolition begins. Materials that may result in possible risk to human health and the environment when improperly managed include lamps, thermostats, and light switches containing mercury; batteries from exit signs, emergency lights, and smoke alarms; lighting ballasts which contain PCBs; and lead pipes and roof vent flashings. Demolition waste such as fluorescent lamps, PCB ballasts, lead acid batteries, mercury thermostats, and lead flashings have special case-by-case requirements for generation, storage, transportation, and disposal. Before disposing of any demolition waste, the demolition contractor should determine if the waste is hazardous and ensure proper disposal of waste materials.

### **3.5 FACILITY CLOSURES**

As part of the facility closure process for occupants with permits for storage of hazardous materials and/or generation of hazardous waste, the DEH typically requires that a closure plan be submitted by the occupant that describes required closure activities, such as removal of remaining hazardous materials, cleaning of hazardous material handling equipment, decontamination of building surfaces, and waste disposal practices, among others. We recommend that facility closure activities be coordinated with the DEH to ensure that required closure activities are completed prior to redevelopment of Site parcels or change in use.

### **3.6 IMPORTED SOIL**

If a development will require importing soil for property grading, we recommend documenting the source and quality of imported soil. The DTSC's Clean Fill Advisory (October 2001) provides useful guidance on evaluating imported fill.

### **3.7 GROUNDWATER WELLS**

Groundwater monitoring wells associated with the identified open LUST and CPS cases are located on some Site parcels. These wells must be protected during construction. Upon written approval from the overseeing regulatory agency and the well owner, the wells could be destroyed under permit from the DEH prior to development activities. Relocation of the wells may be required. Monitoring wells that are no longer in use, or any unidentified wells (such as former agricultural wells) encountered during construction activities, should be properly destroyed in accordance with DEH requirements. Abandoned wells (*i.e.*, those that are not properly destroyed) can act as a conduit for the vertical migration of groundwater contamination. Also, if groundwater levels rise, an abandoned well can become an artisan well with uncontrolled water flow that can adversely impact future developments.

## **SECTION 4: LIMITATIONS**

Cornerstone performed this Screening Level ESA to support David J. Powers & Associates in evaluation of the general environmental setting of the Site. Conclusions presented in this report are based on selected, readily available public information. Screening Level ESAs are inherently limited because findings are developed based on information obtained from a non-intrusive Site evaluation. If a greater degree of confidence is desired, soil, groundwater and/or soil vapor samples should be collected by Cornerstone and analyzed by a state-certified laboratory to establish a more reliable assessment of environmental conditions.

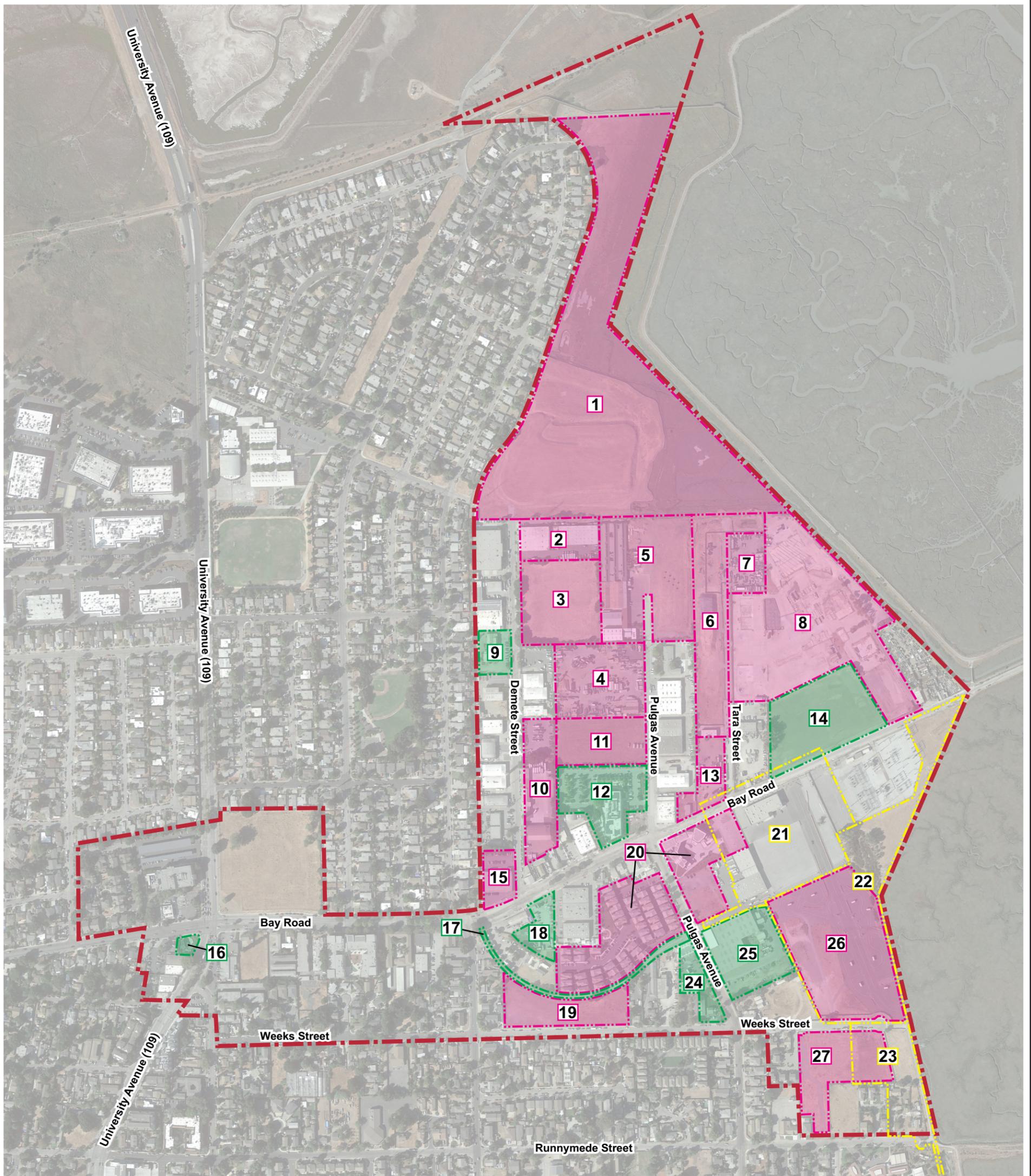
This report, an instrument of professional service, was prepared for the sole use of David J. Powers & Associates and may not be reproduced or distributed without written authorization from Cornerstone. Cornerstone makes no warranty, expressed or implied, except that our services have been performed in accordance with the environmental principles generally accepted at this time and location.



**Vicinity Map**

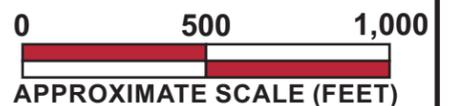
**Ravenswood Business District/  
4 Corners Transit-Oriented Development  
Specific Plan Update  
East Palo Alto, California**

Project Number	118-149-1
Figure Number	Figure 1
Date	February 2023
Drawn By	RRN



**Legend**

-  Approximate Site Boundary
-  Reported Open LUST or CPS case. See Table 1.
-  Open CPS case - Rhone-Poulenc (1990 Bay Road) and associated Operable Units and Subareas. See Table 1.
-  Reported Closed LUST or CPS case. See Table 1.

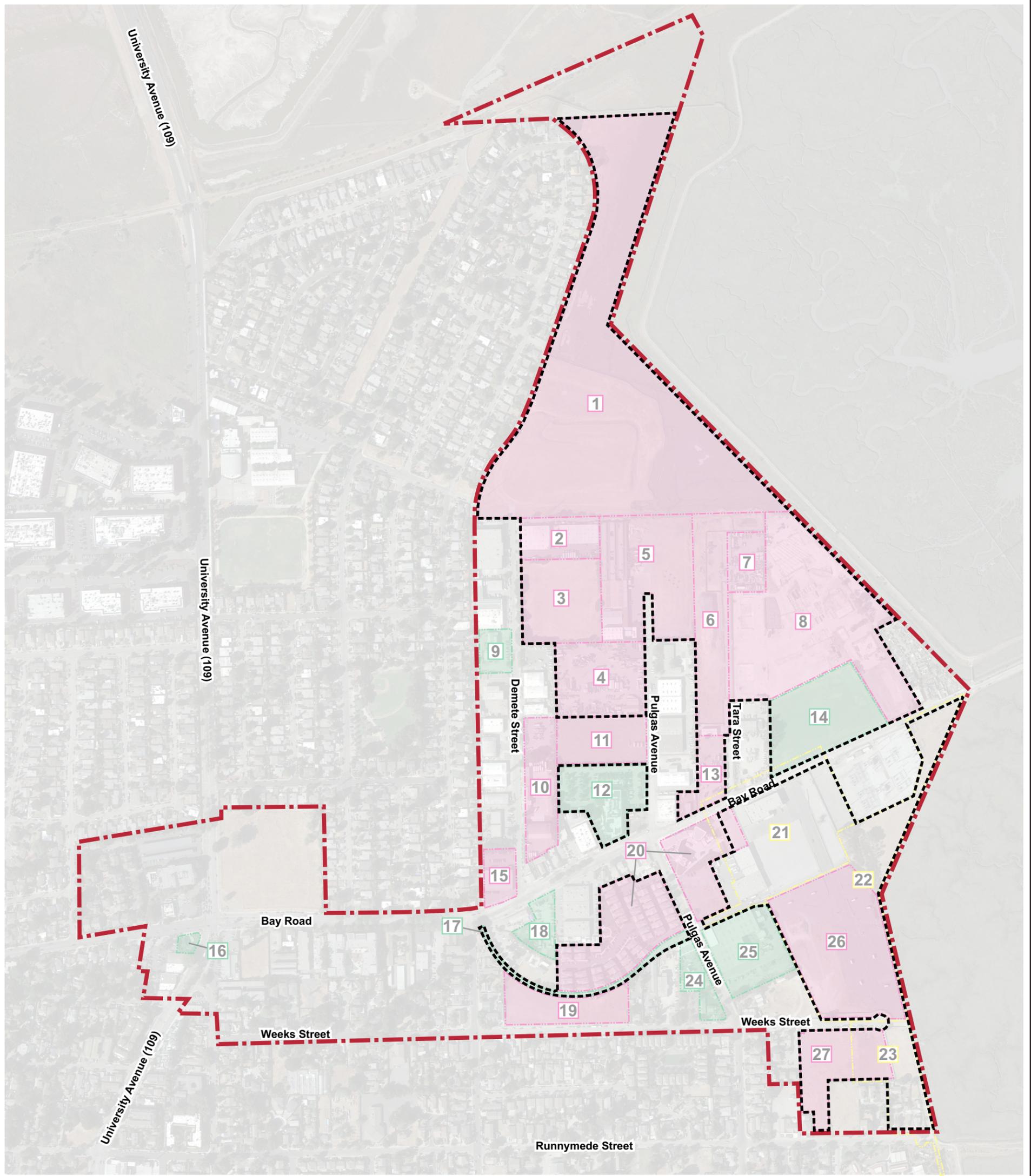


Base by Google Earth, dated 02/11/2022



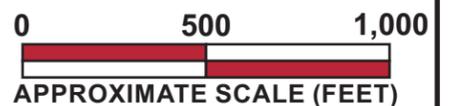
**Site Plan**  
**Ravenswood Business District/  
 4 Corners Transit-Oriented Development  
 Specific Plan Update  
 East Palo Alto, California**

Project Number	118-149-1
Figure Number	Figure 2
Date	February 2023
Drawn By	RRN



**Legend**

- - - - - Approximate Site Boundary
- - - - - Properties with identified Land Use Conventions (deed restrictions)



Base by Google Earth, dated 02/11/2022



**Properties with LUCs**  
**Ravenswood Business District/  
 4 Corners Transit-Oriented Development  
 Specific Plan Update  
 East Palo Alto, California**

Project Number		118-149-1
Figure Number		Figure 3
Date	February 2023	Drawn By
		RRN

**APPENDIX A – WATER BOARD ORDERS 92-037 AND 92-086**

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER 92-037

SITE CLEANUP REQUIREMENTS FOR:

EAST PALO ALTO INDUSTRIAL AREA,  
MULTIPLE LANDOWNERS  
EAST PALO ALTO  
SAN MATEO COUNTY

DISCHARGERS: SEE ATTACHMENT 1

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter called the Board) finds that:

1. SITE DESCRIPTION Numerous privately owned parcels or properties comprise the site, located in the Ravenswood Industrial area (RIA) of East Palo Alto, San Mateo County (Figure 1). The site includes about 70 percent of the RIA and is adjacent to wetlands along the western margin of San Francisco Bay. These properties consist generally of agricultural, manufacturing, auto wreckers and, storage facilities for most of their existence with little or no regulation of land-use.
2. SITE HISTORY The site area has been used for agricultural and industrial purposes for at least the past 60 years. All of the properties within the site are currently zoned industrial and the entire RIA is designated a redevelopment area by the East Palo Alto Redevelopment Agency. Some properties within the site are adjacent to the 1990 Bay Road Superfund site and have commingled pollution.
3. REGULATORY STATUS All individual property owners are referred to as dischargers because of their current ownership of the site properties and shall be required to comply with all requirements of this Order for their individual parcels as listed in attachment 1. There may be additional tenants or others who may also be responsible for discharge of pollutants who are not named as dischargers in this Order, but may be included in this Order or other Board action in the future.
4. OTHER REGULATORY ACTION The Sandoz/Rhone Poulenc, 1990 Bay Road site is currently under Board Order. The Romic Chemical site is being handled under the RCRA corrective action program. This Order is not intended to conflict with remedial actions on these sites. Should conflict arise, amendments to this Order may be appropriate.

5. ADJACENT PROPERTIES Adjacent properties in and around the site that comprise the remainder of the RIA, and who are not named in this Board action, may also be sources of pollution. Should investigation by the named dischargers determine that probable contribution of pollution exists from these offsite properties, further Board action may be required.

6. RATIONALE FOR ORDER Regional Board staff are initiating a sub-regional cleanup to address soil and groundwater pollution that pose a threat to surface and groundwater in the Bay margin area of East Palo Alto and also represent potential sources of delay to Board cleanup on adjacent sites. With only few exceptions, properties within the site have not had sufficient investigation to determine the extent of potential soil and groundwater pollution.

Site inspections by Board staff and local agencies indicate soil pollution exists on many of the parcels within the site area. Pollutants not related to the chemicals of concern at the 1990 Bay Road site have been detected in groundwater samples from monitoring wells at the site. Surface runoff from properties within the RIA drains into the wetland where Board staff have observed hydrocarbon sheens on the surface runoff. Because the extent of soil, surface and groundwater pollution has not been determined and these pollutants are impacting the cleanup operations on other sites within the area as well as wetland and surface waters of the bay, staff consider this site to be of high priority.

7. REDEVELOPMENT AGENCY The East Palo Alto Redevelopment Agency adopted resolution 148, on December 17, 1991 to contract with the Board for oversight under Article 12.5 (commencing with Section 33459) of Chapter 4 of the Community Redevelopment Law (Part 1 of Division 24 of the Health and Safety Code) to remedy or remove a release or hazardous substances from property within a redevelopment area.

To expedite remedial action the Board shall, through this Order, work directly with the property owners. Requirements of this Order shall be in compliance with Health and Safety Code (HSC) Section 33459.3. However, until such time that the East Palo Alto Redevelopment Agency contracts directly with the Board, approval of this action under Section 33459.3 HSC will not be given.

8. COST RECOVERY The dischargers have been advised that the Regional Board intends to enter into cost recovery pursuant to Section 13304 of the California Water Code. This will entitle the Board to seek reimbursement for, all reasonable costs actually incurred by the Board to investigate unauthorized discharges of wastes and to oversee cleanup of

such waste, abatement of the effects thereof, or other remedial action, required by this Order. The Industrial Property Owners Association, DBA Industrial Development Employment Association (IDEA) shall be the contact for cost recovery billing by the State Water Resources Control Board. IDEA is a privately held corporation for area redevelopment whose membership includes all dischargers named herein. If the City of East Palo Alto Redevelopment Agency becomes involved in this Regional Cleanup Action, the Regional Board intends to continue cost recovery with the dischargers pursuant to requirements of Assembly Bill 3193. Staff began recording time spent on this project beginning February 1, 1992. When billing is initiated, it is anticipated that all time expended on this project beginning on February 1, 1992 shall be recoverable.

9. SCOPE OF THIS ORDER This Order is intended to be the primary document by which a sub-regional cleanup of the Ravenswood Industrial Area will be regulated. The Order contains tasks to submit a site use history, a workplan to determine the extent of soil and groundwater pollution and results of the preliminary investigation, and propose tasks and time schedule for further characterization of pollutants. It is anticipated that this Order shall be updated periodically, as appropriate, and further tasks shall be added which shall lead to the remediation of pollutants within the site or inclusion of additional dischargers.
10. The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on December 17, 1986. The Basin Plan contains water quality objectives and beneficial uses for South San Francisco Bay and contiguous surface and groundwater.
11. The existing and potential beneficial uses of the groundwater underlying and in the vicinity of the site include:
  - a. Industrial process water supply
  - b. Industrial service water supply
  - c. Municipal and Domestic water supply
  - d. Agricultural water supply
12. The existing and potential beneficial uses of the surface waters (San Francisco Bay and San Francisquito Creek) and wetland include:
  - a. Contact and non-contact water recreation
  - b. Warm and cold fresh water habitat
  - c. Fish migration and spawning
  - d. Commercial and sport fishing
  - f. Preservation of rare and endangered species

- g. Estuarine habitat
  - h. Wildlife habitat
  - i. Salt marsh habitat
  - j. Navigation
  - k. Shellfish harvesting
  - l. Industrial service supply
13. The dischargers have caused or permitted, and threaten to cause or permit, waste to be discharged or deposited where it is or probably will be discharged to waters of the State and create or threaten to create a condition of pollution or nuisance as defined in Section 13050(m) of the California Water Code.
14. This action is an order to enforce the laws and regulations administered by the Board. This action is categorically exempt from the provisions of the CEQA pursuant to Section 15321 of the Resources Agency Guidelines.
15. The Board has notified the dischargers and interested agencies and persons of its intent under California Water Code Section 13304 to prescribe Site Cleanup Requirements for the discharge and has provided them with the opportunity for a public hearing and an opportunity to submit their written views and recommendations.
16. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that the dischargers, their agents, successors and assigns, shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

- 1. The discharge of wastes or hazardous materials in a manner which will degrade water quality or adversely affect the beneficial uses of the waters of the State, is prohibited.
- 2. Significant migration of pollutants through surface or subsurface transport to waters of the State, is prohibited.
- 3. Activities associated with the subsurface investigation and cleanup which will cause significant adverse migration of pollutants, are prohibited.
- 4. The storage, handling treatment or disposal of soil or groundwater containing pollutants shall not create a

nuisance as defined in Section 13050(m) of the California Water Code.

B. CLEANUP SPECIFICATIONS

1. The dischargers shall conduct site investigation and monitoring activities as needed to define the current local hydrogeologic conditions and the lateral and vertical extent of soil and groundwater pollution. Should monitoring results show evidence of pollutant migration, additional characterization of pollutant extent may be required.
2. The cleanup standards for source-area soils shall be health-based and protective of human health and the environment. A human health risk assessment shall be the basis for establishing soil cleanup standards, and shall follow EPA guidance. If levels higher than those set by health-based parameters for pollutants are proposed, the discharger must demonstrate that cleanup to lower levels is infeasible, that the alternate levels will not threaten the quality of waters of the State, and that human health and the environment are protected. If levels higher than those set by health-based parameters are proposed, institutional controls shall be considered. If any pollutants are left in the soil, a program of continued groundwater monitoring may be required.
3. Final cleanup standards for polluted groundwater, onsite and offsite, shall be in accordance with State Water Resources Control Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California". Proposed final cleanup standards shall be based on a feasibility study of remedial alternatives that compare implementability, cost, effectiveness, time to achieve cleanup goals and an assessment of risk to determine affect on beneficial uses, human health and the environment. Assessment of human health risk shall follow EPA guidance. Cleanup standards shall also have the goal of reducing the mobility, toxicity, and volume of pollutants.
4. If groundwater extraction and treatment is considered as an alternative, the feasibility of water reuse, reinjection, and disposal to the sanitary sewer must be evaluated. Based on the Regional Board Resolution 88-160, the dischargers shall optimize, with a goal of 100%, the reclamation or reuse of groundwater extracted as a result of cleanup activities. The dischargers shall not be found in violation of the Order if documented factors beyond the discharger's control prevent the dischargers from attaining this goal,

provided the dischargers have made a good faith effort to attain this goal by feasible and practicable means. If reuse or reinjection is part of a proposed alternative, an application for Waste Discharge Requirements may be required. If discharge to waters of the State is part of a proposed alternative, an application for an NPDES permit must be completed and submitted in a timely manner, and must include the evaluation of the feasibility of water reuse, reinjection, and disposal to the sanitary sewer.

C. PROVISIONS

1. The dischargers shall comply with the Prohibitions and Specifications above, in accordance with the following time schedule and tasks.

- a. TASK: SUBMIT SITE USE HISTORY  
DUE DATE: August 1, 1992

Description: The dischargers shall submit a technical report acceptable to the Executive Officer containing a site use history for each of the properties to include property ownership, use, tenancy, and chemical use, handling storage and disposal practices.

- b. TASK: SUBMIT WORKPLAN FOR SITE INVESTIGATION AND SCHEDULE FOR IMPLEMENTATION AND SUBMITTAL OF FINAL REPORT  
DUE DATE: September 15, 1992

Description: The dischargers shall submit a technical report acceptable to the Executive Officer containing all elements of the workplan for characterization of soil and groundwater pollution at the site. This workplan shall also include a time schedule for implementation and as well as a Sampling and Analysis Plan (SAP), Quality Assurance Project Plan (QAPP) and a Site Health and Safety Plan.

- c. TASK: SUBMIT RESULTS OF INVESTIGATION AND PROPOSE FURTHER INVESTIGATION NECESSARY  
DUE DATE: as proposed in task C.1.b. and approved by the Executive Officer

Description: The dischargers shall submit a technical report acceptable to the Executive Officer containing the results of the investigation as specified in the Workplan. The dischargers shall also propose further investigation necessary to fully characterize the pollutants. A comprehensive program for groundwater

monitoring and schedule for sampling shall also be proposed.

2. The dischargers shall submit to the Regional Board acceptable reports on compliance with the requirements of this Order that contain descriptions and results of work and analyses performed. It is not Board intent to duplicate any reports due, therefore any reports due concurrently may be combined. These reports prescribed below:

a. The dischargers shall submit bi-monthly status reports on compliance with this Order. The first report shall be for the months of May and June, 1992 and shall be due on July 15, 1992. Thereafter reports shall be due on the 15th day of every other month to cover the previous 2 months. The report shall include at least the following:

- 1) Summary of work completed since submittal of the previous report, and work projected to be completed before submittal of next report.
- 2) Identification of any obstacles which may threaten compliance with the schedule of this Order and what actions are being taken to overcome these obstacles.

b. A program of groundwater monitoring shall be established based on the site investigation report proposal of task C.1.c. The dischargers shall submit reports to the Board on results of groundwater monitoring. Groundwater monitoring reports shall be submitted in accordance with the schedule proposed in Provision C.1.c. and approved by the Executive Officer. All compliance and monitoring reports shall include at least the following:

- 1) Cumulative tabulated results of water quality sampling analyses for all wells and groundwater pollution plume maps based on these results.
- 2) A cumulative tabulation of all well construction details, water level measurements and updated piezometric maps based on these results.
- 3) Reference diagrams and maps including any updated geologic cross sections describing the hydrogeologic setting of the site, and appropriately scaled and detailed base maps showing the location of all monitoring wells and extraction wells, and identifying facilities and structures.

- c. The dischargers shall submit annual summary status reports on the progress of compliance with all requirements of this Order and propose modifications which could increase the effectiveness of final cleanup actions. The first report shall be due on January 31, 1993, and would cover the previous calendar year. The report shall include at least: progress on site investigation and remediation, operation and effectiveness of remediation actions and systems, and an evaluation of the feasibility of meeting groundwater and soil cleanup goals.
3. The dischargers may, by written request, seek modifications or revisions of this Order or any program or plan submitted pursuant to this Order at any time. This Order and any applicable program, plan, or schedule may be modified, terminated or revised by the Board.
  4. If the dischargers may be delayed, interrupted or prevented from meeting one or more of the completion dates specified in this Order, the dischargers shall promptly notify the Executive Officer. If, for any reason, the dischargers are unable to perform any activity or submit any document within the time required under this Order, the dischargers may make a written request for a specified extension of time. The extension request shall include a justification for the delay, and shall be submitted in advance of the date on which the activity is to be performed or the document is due. The Board staff may propose an amendment to the Order and bring the matter to the Board for consideration.
  5. Nothing in this Order is intended or shall be construed to limit or preclude any right the dischargers have or may have to seek administrative and/or judicial review of any orders or determinations of the Board and/or its staff.
  6. All hydrogeological plans, specifications, technical reports and documents shall be signed by or stamped with the seal of a State registered geologist, registered civil engineer, or certified engineering geologist.
  7. All samples shall be analyzed by State certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories or the consultant shall maintain quality assurance/quality control records for Board review for a period of six years.
  8. The dischargers shall maintain in good working order, and operate in the normal standard of care, any facility or control system installed to achieve compliance with the requirements of this Order.

9. Copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of this Order shall be provided to the following agencies:
  - a. San Mateo County Health Department
  - b. City of East Palo Alto
  - c. Cal-EPA, Department of Toxic Substances Control
  - d. Regional Water Quality Control Board
10. The dischargers shall permit, within the scope of each of their authorities, the Board or its authorized representative, in accordance with Section 13267 (c) of the California Water Code:
  - a. Entry upon dischargers' premises in which any pollution sources exist, or may potentially exist, or in which any required records are kept, which are relevant to this Order.
  - b. Access to copy any records required to be kept under the terms and conditions of this Order.
  - c. Inspection of any monitoring equipment or methodology implemented in response to this Order.
  - d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the discharger.
11. The dischargers shall file a report in a timely manner on any changes in site occupancy and ownership associated with the facility described in this Order.
12. If any hazardous substance is discharged in or on any waters of the State, or discharged and deposited where it is, or probably will be discharged in or on any waters of the State, the dischargers shall report such a discharge to this Board, at (415) 464-1255 on weekdays during office hours from 8 a.m. to 5 p.m., and to the Office of Emergency Services at (800) 852-7550 during non-office hours. A written report shall be filed with the Board within five (5) working days and shall contain information relative to: the nature of the waste or pollutant, quantity involved, duration of incident, cause of spill, Spill Prevention, Control and Countermeasure Plan in effect, if any, estimated size of affected area, nature of effects, corrective measures that have been taken or planned, and a schedule of these activities, and persons notified.
13. Any provisions of this Order substantially identical to provisions which the State Water Board or a court of law

determines to be in excess of the Board's legal authority shall have no force or effect in this Order.

14. This Order is intended to be the primary regulating document by which site cleanup shall proceed on a regional basis for the dischargers and properties named herein, with the Board as lead agency, and IDEA Corporation as the recoverers contact representing the named dischargers.
15. The Board would like to remind dischargers that a General Industrial Storm Water Permit was adopted by the State Water Resources Control Board on November 19, 1991. This permit will apply storm water discharge from many of the industries located within the Ravenswood Industrial Area. The permit requires dischargers to submit a Notice of Intent to the State Water Resources Control Board by March 30, 1992. To determine if this permit applies to your particular operation or if you have not filed a Notice of Intent, please contact the Division of Water Quality at (916) 657-0756 immediately.
16. The Board will review this Order periodically and may revise the requirements when necessary.

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on April 15, 1992.



Steven R. Ritchie  
Executive Officer

Attachments:

- 1 - List of Dischargers

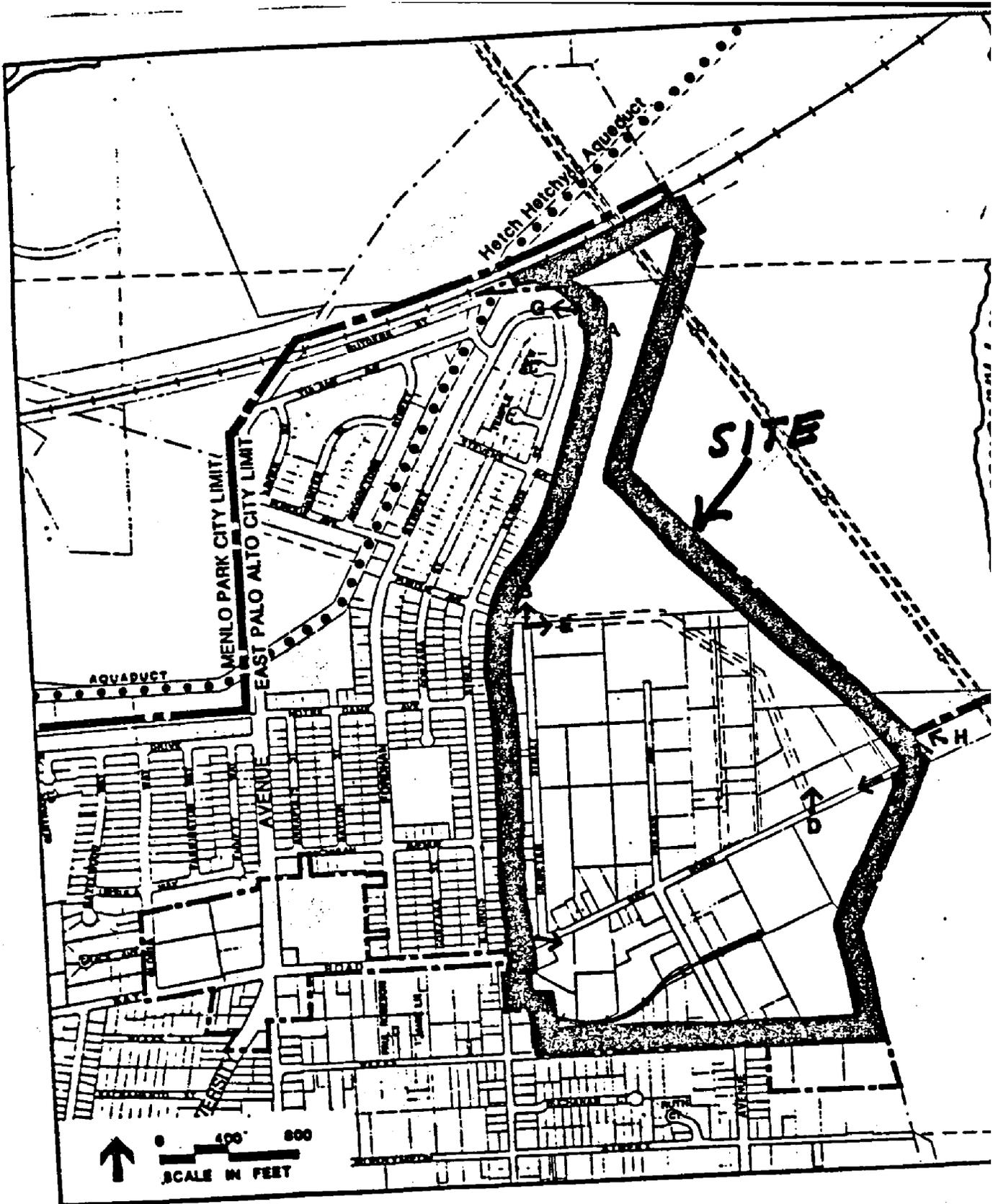
**Attachment 1**

**LIST OF LANDOWNERS/DISCHARGERS  
EAST PALO ALTO INDUSTRIAL AREA  
East Palo Alto, San Mateo County**

No.	PROPERTY OWNER	PARCEL NUMBER
1.	Dante Bains P.O. Box 50219 Palo Alto, CA 94303	063-240-350, 063-240-400, 063-240-340
2.	Mike Baker P.O. Box 368 Redwood City, CA 94064	063-121-400, 063-121-410
3.	Bruce Baron 255 Demeter St. East Palo Alto, CA 94303	063-123-070
4.	Michael Berthiaume 2536 Pulgas Ave East Palo Alto, CA 94303	063-132-190
5.	Jennie J. Bishop 220 Emerson St. Palo Alto, CA 94301	063-231-180
6.	Robert Borrman 2450 Pulgas Ave East Palo Alto, CA 94303	063-240-390, 063-240-310
7.	Lee Clemons 1800 Bay Road East Palo Alto, CA 94303	063-231-220
8.	Melvin Curtaccio 1925 Bay Road East Palo Alto, CA 94303	063-121-050, 063-121-060, 063-132-100, 063-132-160, 063-132-170, 063-132-120, 063-132-130, 063-132-110, 063-240-320, 063-240-330
9.	Michael Demeter 160 Demeter St. East Palo Alto, CA 94303	063-121-330, 063-121-340, 063-121-360, 063-121-290, 063-121-430, 063-121-120, 063,121-290, 063-132-090
10.	Robert Facciola P.O. Box 50548 Palo Alto, CA 94303-0548	063-050-030

11.	John Garcia 1905 Bay Road East Palo Alto, CA 94303	063-132-140
12.	Harry Higaki P.O. Box 941 Half Moon Bay, CA 94019	063-121-020, 063-121-200, 063-121-210
13.	Saturo and Emma Iwasaki 2519 Pulgas Ave. East Palo Alto, CA 94303	063-131-220
14.	Richard Lake and Mabel Cordes P.O. Box 50367 Palo Alto, CA 94303	063-122-016, 063-122-015, 063-231-240
15.	Helen Engelbert 615 Gloucester Lane Foster City, CA 94404	063-123-010
16.	Merlo Foods 175 Demeter St. East Palo Alto, CA 94303	063-133-080, 063-133-070, 063-133-100
17.	Russ Peck and Thomas O'Conner 1965 Latham Mountain View, CA 94040	063-231-190, 063-231-200
18.	O.B. Ray 225 Demeter St. East Palo Alto, CA 94303	063-123-030, 063-123-080
19.	Ron Rogge 1987 Bay Road East Palo Alto, CA 94303	063-132-220, 063-121-150
20.	Vincent Romelfanger 2520 Pulgas Ave. East Palo Alto, CA 94303	063-132-150
21.	Philip Wang 5 Miller Court Redwood City, CA 94061	063-133-110, 063-133-110
22.	Richard Russel Brown Wood Products 325 Demeter St. East Palo Alto, CA 94303	063-123-060

23.	Henry Wong 1045 Weeks St. East Palo Alto, CA 94303	063-232-240
24.	Don Sevy 3820 Park Blvd. Palo Alto, CA 94303	063-131-300, 063-131-320, 063-131-330
25.	Denny Sibbert 163 Highland Ave. San Carlos, CA 94070	063-132-210, 063-231-260
26.	Tara Association Ted Thompson 410 Cambridge Ave. East Palo Alto, CA 94303	063-132-060
27.	Jess Torres P.O. Box 1270 Mountain View, CA 94042	063-240-420
28.	Charles Touchatt 2535 Pulgas Ave. East Palo Alto, CA 94303	063-121-370
29.	Edward Green 811 Hamilton Menlo Park, CA 94025	063-231-170



**FIGURE 1**

**PHOTOGRAPH LOCATION**  
 Ravenswood Industrial  
 Redevelopment Plan & GPA Program  
 Wallace Roberts

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER 92-086  
(AMENDING ORDER 92-037)

SITE CLEANUP REQUIREMENTS FOR:

EAST PALO ALTO INDUSTRIAL AREA,  
MULTIPLE LANDOWNERS  
EAST PALO ALTO  
SAN MATEO COUNTY

DISCHARGERS: SEE ATTACHMENTS 1 AND 1A

The California Regional Water Quality Control Board,  
San Francisco Bay Region (hereinafter called the Board) finds  
that:

1. SITE DESCRIPTION The Ravenswood Industrial area (site) of East Palo Alto, consists of numerous privately owned parcels or properties which are located adjacent to wetlands along the western margin of San Francisco Bay (Figure 1). These properties consist generally of agricultural, manufacturing, auto wreckers, and storage facilities for most of their existence with little or no regulation of land-use. The site area has been used for agricultural and industrial purposes for at least the past 60 years.
2. SITE HISTORY On April 15, 1992, the California Regional Water Quality Control Board, San Francisco Bay Region, adopted Site Cleanup Requirements (Order 92-037) for several parcels (Attachment 1) in the Ravenswood Industrial Area. These parcels comprise about 70 percent of the total acreage. The Order contains tasks required to evaluate if soil and or groundwater pollution has occurred by past or present site use activities. The Order named each of the individual property owners as dischargers because of their current ownership of the site properties and required they comply with all requirements of the Order for their individual parcels.
3. RATIONALE FOR ORDER The Regional Board, pursuant to Order 92-037, is initiating a sub-regional cleanup to address soil and groundwater pollution that pose a threat to surface and groundwater in the Bay margin area of East Palo Alto and also represent potential sources of delay to Board cleanup on adjacent sites. As part of this action, Board staff have conducted visual inspections of the site. Board staff have also reviewed the Phase 1 Hazardous Materials Site Assessment that was prepared (in November, 1989) by ERC Environmental and Energy Services Company for the City of

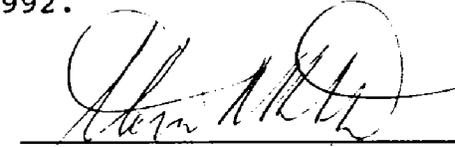
East Palo Alto Redevelopment Agency. From the visual inspections and data presented in the above referenced report, a basis exists for including the remaining 30 percent of the properties located in the Ravenswood Industrial Area to Order 92-037.

4. SCOPE OF ORDER This Order shall amend Order 92-037 to include those property owners (Attachment 1A) in the Ravenswood Industrial area, who are not currently named in the Order, as dischargers. The Order amendment shall require the dischargers listed in Attachments 1 and 1A to comply with all requirements set forth in Order 92-037 as amended by this Order. This Order shall also revise due dates for tasks required by Order 92-037.

Board Order 92-037 is amended as follows:

1. The following property owners are added as named dischargers for their individual parcels:  
  
See Attachment 1A.
2. Submittal of reports required by Provisions C.1.a. and C.1.b. are revised to October 1, 1992 and November 15, 1992 respectively.
3. Corrections as to ownership and parcel numbers of Attachment 1.

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on July 15, 1992.



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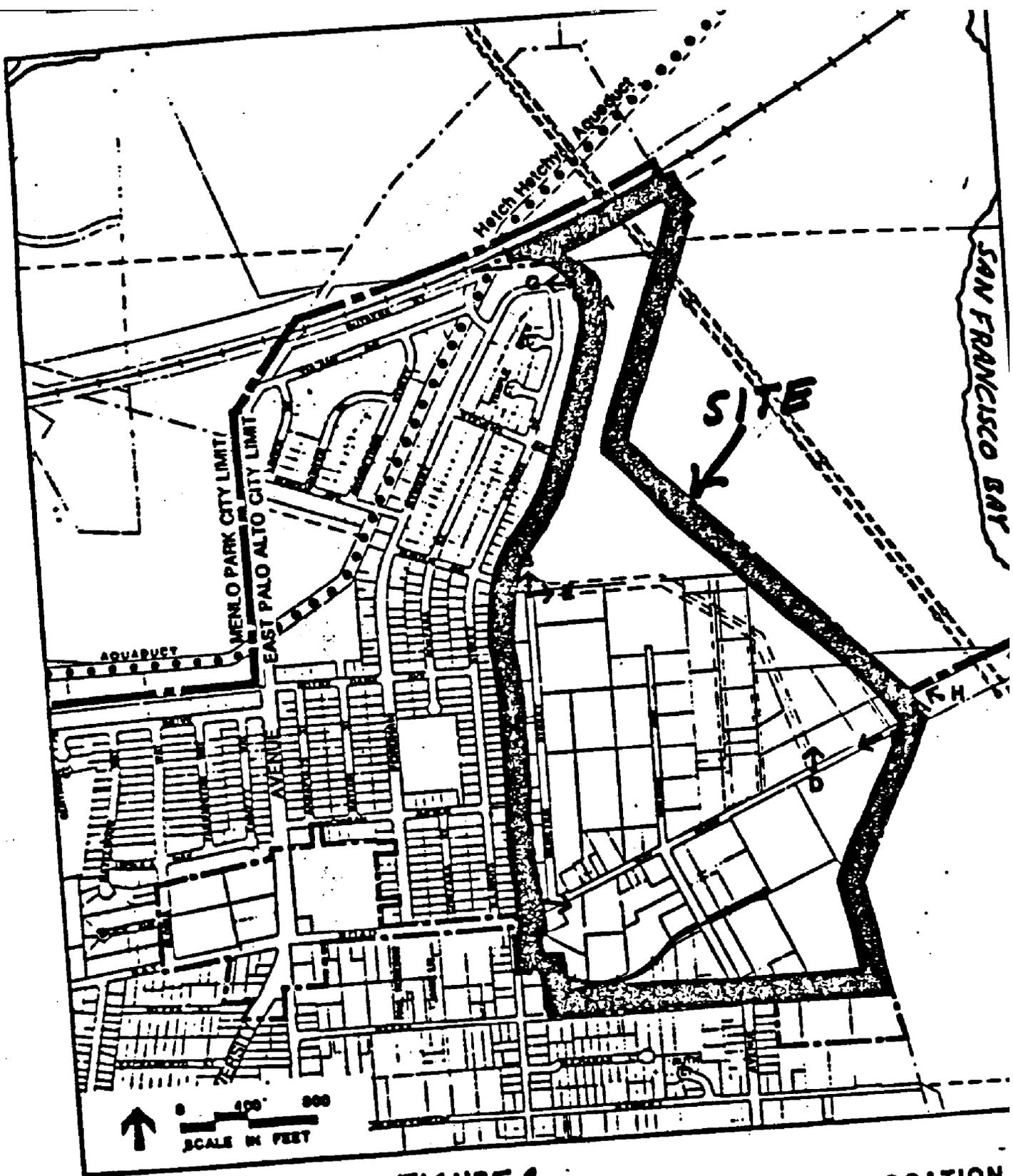
Steven R. Ritchie  
Executive Officer

Attachments:

- 1 - List of Dischargers from Order 92-037
- 1A - List of Dischargers added by this amendment

Figure:

Figure 1, Site Location Map



**FIGURE 2**

**PHOTOGRAPH LOCATION**  
 Ravenswood Industrial  
 Redevelopment Plan & GPA Progra  
 Wallace Roberts

**Attachment 1**

**LIST OF LANDOWNERS/DISCHARGERS  
EAST PALO ALTO INDUSTRIAL AREA  
East Palo Alto, San Mateo County**

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3.	Bruce Baron 255 Demeter St. East Palo Alto, CA 94303	063-123-070
4.	Michael Berthiaume 2536 Pulgas Ave East Palo Alto, CA 94303	063-132-190
5.	Jennie J. Bishop 220 Emerson St. Palo Alto, CA 94301	063-231-180
6.	Robert Borrman 2450 Pulgas Ave East Palo Alto, CA 94303	063-240-390, 063-240-310
7.	Lee Clemons 1800 Bay Road East Palo Alto, CA 94303	063-231-220
8.	Melvin Curtaccio 1925 Bay Road East Palo Alto, CA 94303	063-121-050, 063-121-060, 063-132-100, 063-132-160, 063-132-170, 063-132-120, 063-132-130, 063-132-110, 063-240-320, 063-240-330
9.	Michael Demeter 160 Demeter St. East Palo Alto, CA 94303	063-121-330, 063-121-340, 063-121-360, 063-121-290, 063-121-430, 063-121-120, 063,121-290, 063-132-090
10.	Robert Facciola P.O. Box 50548 Palo Alto, CA 94303-0548	063-050-030

11.	John Garcia 1905 Bay Road East Palo Alto, CA 94303	063-132-140
12.	Harry Higaki P.O. Box 941 Half Moon Bay, CA 94019	063-121-020, 063-121-200, 063-121-210
13.	Saturo and Emma Iwasaki 2519 Pulgas Ave. East Palo Alto, CA 94303	063-131-220
14.	Richard Lake and Mabel Cordes P.O. Box 50367 Palo Alto, CA 94303	063-122-016, 063-122-015, 063-231-240
15.	Helen Engelbert 615 Gloucester Lane Foster City, CA 94404	063-123-010
16.	Menlo Foods 175 Demeter St. East Palo Alto, CA 94303	063-133-080, 063-133-070, 063-133-100
17.	Russ Peck and Thomas O'Conner 1965 Latham Mountain View, CA 94040	063-231-190, 063-231-200
18.	O.B. Ray 225 Demeter St. East Palo Alto, CA 94303	063-123-030, 063-123-080
19.	Ron Rogge 1987 Bay Road East Palo Alto, CA 94303	063-132-220, 063-121-150
20.	Vincent Romelfanger 2520 Pulgas Ave. East Palo Alto, CA 94303	063-132-150
21.	Philip Wang 5 Miller Court Redwood City, CA 94061	063-133-110, 063-133-110
22.	Richard Russel Brown Wood Products 325 Demeter St. East Palo Alto, CA 94303	063-123-060

23.	Henry Wong 1045 Weeks St. East Palo Alto, CA 94303	063-232-240
24.	Don Sevy 3820 Park Blvd. Palo Alto, CA 94303	063-131-300, 063-131-320, 063-131-330
25.	Denny Sibbert 163 Highland Ave. San Carlos, CA 94070	063-132-210, 063-231-260
26.	Tara Association Ted Thompson 410 Cambridge Ave. East Palo Alto, CA 94303	063-132-060
27.	Jess Torres P.O. Box 1270 Mountain View, CA 94042	063-240-420
28.	Charles Touchatt 2535 Pulgas Ave. East Palo Alto, CA 94303	063-121-370
29.	Edward Green 811 Hamilton Menlo Park, CA 94025	063-231-170

**Attachment 1A**

**LIST OF LANDOWNERS/DISCHARGERS  
EAST PALO ALTO INDUSTRIAL AREA  
East Palo Alto, San Mateo County**

No.	PROPERTY OWNER	PARCEL NUMBER
1.	Allen, Robert 1003 Weeks Street East Palo Alto, CA 94303	063-232-090
2.	Barajas Samuel and Maria 1896 Bay Road East Palo Alto, CA 94303	063-231-230
3.	Barajas, Samuel and Ibarr 1896 Bay Road East Palo Alto, CA 94303	063-231-280
4.	Barnes, Jack H. 611 12th Ave Menlo Park, CA 94025	063-133-090
5.	Beer, Deen R. and Jean 1885 Bay Road East Palo Alto, CA 94303	063-133-230, 063-131-240, 063-131-310
6.	Bernard, William 1711 Westport Road Kansas City, MO 64111	063-272-100
7.	County of San Mateo County Government Center Redwood City, CA 94063	063-121-190
8.	Duca and Hanley Properties 19312 Athos Place Saratoga, CA 95070	063-240-210, 063-240-220
9.	East Palo Alto Sanitary District 2524 Pulgas Ave. East Palo Alto, CA 94303	063-232-350
10.	Gheith, Yousef 521 3rd Street San Francisco, CA 94107	063-232-300
11.	Green, Edward and Ann 600 Crane Ave. Foster City, CA 94404	063-231-290

12.	Harmony Investment Co. P.O. Box 186 Half Moon Bay, CA 94019	063-121-020, 063-121-200, 063-121-210
13.	Ingram, Bobbie 325 Hazen Street Milpitas CA, 95035	063-131-250
14.	Iwasaki, Chiyoko and Han 1001 Waverly Ave Palo Alto, CA 94301	063-232-200, 063-232-210, 063-232-220, 063-232-230
15.	Lakeshore Financial 1915 Alum Rock Ave. San Jose, CA 95116	063-271-043, 063-271-430
16.	Marilyn Lemmon 486 Diamond Ct. Palo Alto, CA 94306	063-131-260, 063-131-270
17.	William Leonhart 69 Finger ve Redwood City, CA 94062	063-121-060
18.	Lopez and Guadnecio 1103 Weeks St. East Palo Alto, CA 94303	063-240-270, 063-240-360
19.	M, A & R P.O. Box 50367 Palo Alto, CA 94303	063-232-150, 063-232-160
20.	Mo, Yoke K & Ngoc Uan 2121 Old Page Mill Rd. Palo Alto, CA 94304	063-133-100, 063-133-070 063-133-080
21.	Price, Dallas and Berth 810 Schembri Lane Palo Alto, CA 94303	063-232-340
22.	Park, Ray & Sons 225 Demeter St. East Palo Alto, CA 94303	063-123-030, 063-123-080
23.	Roblake, Inc. P.O. Box 50065 Palo Alto, CA 94303	063-231-240
24.	Salzburg, David 815 N. Humbolt, 303 San Mateo, CA 94401	063-231-210

25.	Joseph Scianacalapore 3390 Alder Ave. Fremont, CA 94536	063-121-030, 063-121-040, 063-121-350, 063-132-020, 063-132-040
26.	Simon, Bertrand A. 57 Edgemont Way Oakland, CA 94605	063-231-270
27.	Tanklage, Don & Carole 1025 Tanklage Rd. San Carlos, CA 94070	063-231-250
28.	Tupou, Takivaha E. 1001 Weeks St. East Palo Alto, CA 94303	063-232-260
29.	Tyson, Herbert P., Jr. 2509 Pulgas Ave. East Palo Alto, CA 94303	063-131-340
30.	Wade, Robert 831 Bay Ave, Suite C Capatola, CA 95010	063-271-220