

April 25, 2022

Manuel Ramirez, Chair and Members of the San Mateo County Planning Commission 455 County Center, 2nd Floor Redwood City, CA 94063

Re: Item #5 on the April 27, 2022 Agenda: PLN2018-00057 (Buck's Butane/Amerigas) Coastal Development Permit to legalize unpermitted development at an existing propane storage and distribution facility at 399 Airport Street, Moss Beach

Dear Chair Ramirez and Commissioners,

On behalf of Green Foothills, I write to urge **you to deny the Coastal Development Permit (CDP) for the above-referenced project.** The Amerigas facility has been operating without benefit of the required Coastal Development Permit (CDP) for decades.

This unattended facility is located adjacent to 227 low income families living at the Pillar Ridge Manufactured Home Community as well as the Big Wave project's 57 units of housing for intellectually and developmentally disabled adults that recently broke ground and will be constructed over the next two years or so. Both Pillar Ridge and Big Wave are considered sensitive receptors.

The "M-1" District (Light Industrial) zoning provides that: "no use shall be carried on in a manner that is, in the opinion of the Planning Commission, objectionable from the standpoint of odor, dust, smoke, gas, noise or vibration."

As noted in the Staff Report, members of the public and neighbors have raised objections to the operation of this unpermitted facility for years. This is an environmental justice issue and we urge denial of the CDP in order to assure the safety and well-being of the Pillar Ridge and Big Wave neighbors.

Thank you for consideration of our comments.

Sincerely,

nie Roberts

Lennie Roberts, Legislative Advocate

From:	Dave Olson
To:	Planning Commission; Summer Burlison
Cc:	Janneth Lujan
Subject:	PLN2018-00057 Midcoast Community Council Comments on Buck"s Butane-Propane CDP
Date:	Monday, April 25, 2022 10:27:02 AM

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

After reading the staff report for this item, prepared for the April 27th, 2022 meeting of the Planning Commission, we do not feel that the conditions and comments in the staff report address the concerns of the MCC, nor of the community, most especially those of the immediately adjacent residents of the Pillar Ridge Manufactured Home Community.

Our concerns are expressed in our two letters, included in the staff report, and in more detail, with slides, on our website: https://midcoastcommunitycouncil.org/propane-facility-airport-st

Please do not approve the requested Coastal Development Permit for this project.

Thank you,

Dave Olson Midcoast Community Council daveolsonmcc@gmail.com 650.387.3618 (cell) http://www.midcoastcommunitycouncil.org/ Saturday, April 23, 2022 Tamez Family Moss Beach, CA

TO: Planning Commission, San Mateo CountyRe: Planning Commission Hearing-Agenda For 04/27/2022-Item 5

There is great concern for the safety of the residents here at Pillar Ridge Manufactured Home Community which abuts the Bucks Butane yard. Back in 2017 I was preparing to work in my backyard when I heard a loud bang. Within a minute, I detected the very strong odor of propane gas. Rushing to the back yard, I climbed up my ladder and took photos of a large propane tank that was pouring out it's contents. The wind was carrying it northward right over residential homes. I ran out of the house to warn people to evacuate their homes and saw Mrs Emerita Arellano holding her infant boy and running with her other toddler son away from her home which was directly in the path of the gas cloud. They and many others who lived downwind from that cloud were also running and screaming. As a person with acute asthma, I had to cover my face with my shirt but was still coughing with my eyes watering as were many others. I'm describing what occurred that day for you folks at the Planning Commission who may not be aware of what happened. The residents at Pillar Ridge, with homes that sit six to twelve feet from the Bucks Propane fence are living in fear because of that incident. Buck's Propane Gas has always vented their tanks which cause a horrible odor that drives us inside. Please look at the photo I took so you can see for yourselves how furious the leaking propane swept over our community. Please do not allow this gas company to renew activities that could very well cause further damage and bring law suits. Thank you all for hearing our concerns.

Mr. & Mrs Joseph Tamez Residents since 1996



From:	Pillar Ridge
To:	Planning Commission
Subject:	Planning Commission April 27 Hearing
Date:	Monday, April 25, 2022 3:06:32 PM
Attachments:	2017-10-25-AmeriGas-hmbreview.pdf

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Re: Agenda item 5 (PLN20108-00057) Two items of concern with the plan:

- 1. security fencing
- 2. resume used tank storage

Security fencing: This 8' foot chain link fence is falling over at some locations. Originally installed without permit & not in a workmanship like manner. Around the fence is weed overgrowth, graffiti and dumping which is not managed by Amerigas. See photos attached.

Resume used tank storage: Proposed resumption of used tank storage will create safety hazards to the nearby community of over 1000 souls. "Used" tanks are stored because they are not serviceable (unsafe, leaking, etc.). These tanks are also "de-valved" periodically which, in addition to tank leaks/failures, results in uncontrolled mercaptan release and "false alarm" gas leak reports.

Adjacent to the propane yard are families living in the Pillar Ridge community who have been directly impacted by both the environmental side effects of uncontrolled mercaptan release/exposures and the routine creation of unannounced hazardous circumstances caused by these uncontrolled leaks from Amerigas. Residents have complained of sore throat and breathing difficulties resulting from the strong mercaptan odors coming from the propane yard. However, most serious is that the stored tanks set in motion a "perfect storm" of compounding errors that could result in loss of life and property.

"False alarm" gas leak reports were common until the local community became accustomed to the odors of mercaptan from the Amerigas yard. Leaks and de-valving occurred frequently enough that residents STOPPED REPORTING GENUINE GAS LEAKS to PG&E and the Park!

Permitting a 15,000 gallon storage tank that has already had an uncontrolled venting/leak event to remain on site, even though it no longer services the Park as originally intended, is bad enough. When this 15,000 gallon dedicated tank was disconnected/deprecated from servicing the Park, was its permit for use under alternate circumstances ever disclosed and permitted?

Be aware that permitting used tank storage will result, again, in a perfect storm for a fire/explosion event when either our local PG&E gas system or any home has a genuine gas leak that needs immediate attention. Practically speaking, what do you think will happen if there is an actual gas leak at Pillar Ridge? Nothing, because everyone will think "Oh, it's just the propane yard next door." This is not speculation. This has already happened.

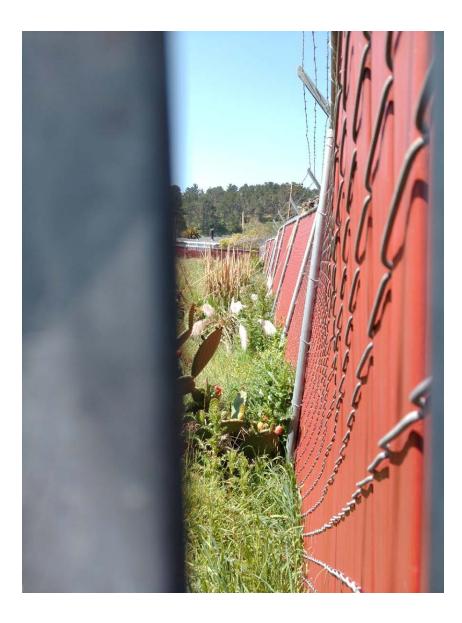
We've been there and done that and it is unsafe by any metric. In the past, my attempts to get

cooperation from Amerigas on this issue have been fruitless. Despite verbal assurances, I (property manager at the Pillar Ridge Manufactured Housing Community) was never notified by Amerigas operators of planned de-valving operations. Notwithstanding, had we been notified, it (and the leaking tanks) would have continued to confuse residents about the true nature of the gas leak odors. Neither should it be my job, nor should the burden fall to residents, to manage and suffer from the fallout of Amerigas' operations on a neighboring parcel.

Despite our prior complaints and explanations to the County, it appears the current staff report has fully misapprehended the severity of the hazards posed by Amerigas operations to the lives and property of local residents. It is ill advised that any agency would consider undermining the safety of the local community by allowing any gas operator to store extra/used LP tanks that are de-valved and/or unserviceable, so close to families and homes.

Thank you for your consideration of my comments & please refer to the attached HMB Review article.

-Regards, Paul Bowman, Pillar Ridge M.H.C. resident manager 1-650-728-3389





From: Lisa Ketcham <<u>lisa.ketcham@comcast.net</u>>
Subject: PC 4/27/22 Item 5, Airport St. propane facility PLN2018-00057
Date: April 26, 2022 at 8:33:59 AM PDT
To: Planning Commission <<u>Planning Commission@smcgov.org</u>>
Cc: Summer Burlison <<u>sburlison@smcgov.org</u>>, Steve Monowitz <<u>smonowitz@smcgov.org</u>>, Timothy
Fox <<u>tfox@smcgov.org</u>>

Attached are additional background documents and photos to supplement the staff report, and ensure a full record of the history of the subject project:

1. 2004 letter from Robert Shaw, Consulting Environmental Planner for SMC Office of Housing, "Siting of HUD-assisted projects near hazardous operations", regarding ability to use CDBG funds to assist the non-profit purchase and rehabilitation of Pillar Ridge (known at the time as El Granada Mobilehome Park).

2. Slide deck from MCC webpage covering the propane facility history and issues presented and discussed at their community meetings 2017-2019, and as updated to keep the community informed. http://midcoastcommunitycouncil.org/propane-facility-airport-st

3. I'm also submitting here a new slide deck to provide context for discussion of perimeter fencing at the propane facility.

I want to let you know, in regard to the Fair Political Practices Act, I live at Pillar Ridge, but my manufactured home is more than 600 ft from the propane facility. I don't live downwind of either local prevailing wind direction, so my home has not been subject to the odors, gas, or noise of the propane facility. I do not own the land under my home and I have no financial interest with the non-profit owner of the community.

Sincerely, Lisa Ketcham



Robert Shaw & Associates

46 Del Oro Lagoon Bel Marin Keys Novato, CA 94949

Wielog Lise K

728-3287

To: Mr. Larry Johnson c/o Marina Yu San Mateo County, Office of Housing 262 Harbor Blvd., Building A Belmont, CA 94002

From: Robert B. Shaw Consulting Environmental Planner 46 Del Oro Lagoon Novato, CA 94949

Marina Tu

Re: El Granada Mobile Home Park 164 Culebra St. Moss Beach, CA 94038 Explosive Hazard Recommendations

Dear Larry,

As you requested, I am sending you this information for your consideration.

We have a major problem that, in my opinion, is not solvable. It basically goes back to incompatible land uses. That is, residential development (Mobile Home Park) adjacent to a Hazardous Facility (Northern Energy Propane).

The use of CDBG funds to be used for Project Acquisition / Rehab. Subjects it to HUD Regulation 24 CFR Part 51 Subpart C. "Siting of HUD-Assisted Projects Near Hazardous Operations".

Outside of the fact that the existing Propane site is probably operating within San Mateo Codes, it doesn't negate the federal requirements.

The existing stationary Propane Tank has the capacity of containing 15,000 gallons of propane fuel. When we plug in the HUD charts (enclosed) we could have a catastrophic accident that would result in a 250' wide fire width that would probably be 250' high also. Any building within 180' would be combustible and any person within 900' could sustain major burns.

In addition the explosion blast overpressure for building & people within 560' would be life threatening.

In the event of an explosion and since there are presently mobile homes as close as 75' of the stationary tanks, most of the park would be subjected to explosive and/or thermal radiation.

In addition to the stationary tank there is numerous smaller propane tanks scattered throughout the site.

On 6/1/04 Marina Yu and I met with the owner of the propane property. They were very cooperative but stated that they are operating within code. They said it could cost up to \$600,000 to relocate the present tank besides the cost of permits and land, etc. the juxtaposition of the existing tank, trailer property lines, etc when confronted with a fire width and beight of 250' and in order to protect the resident within 900' of the tank would make even a property line bust wall ineffective much less infeasible (see 24 CFR Part 51 Subpart C Chapter 5 #14).

The only possible solution would be deed restriction on the Propane property plus a blastproof bunker that would contain a fire ball & the explosion.

I hope this is some assistance to you.

Sincerely,

Robert Show

Robert Shaw

Date: April 26, 2022

To: Chair Manuel Ramirez and fellow Planning Commissioners Gupta and Hansson From: Commissioner Ketcham

Re: Airport St Propane Facility -- Perimeter Fencing

Attached slides are submitted to provide additional context for discussion of perimeter fencing at the propane facility on Airport St (at red X).





North Perimeter Fence

Could not withstand south winds – leans against adjacent pre-existing Pillar Ridge fence, and has for many years.



Built only 1 ft from pre-existing fence, and sagging against it.

Impossible to maintain tight space between fences – such as trash at bus stop.

Should this 8-ft fence be allowed with no setback from residence in MH District?



Pillar Ridge fence supports sagging propane fence at resident's back porch.

East Perimeter Fence -- on Airport St.



The sidewalk fence segment encroaches into the ROW where sidewalk width is limited and there is no room for bus stop bench or shelter at northeast property corner.

Propane safety regulations only require 6-ft fence height. The entire parcel is not required to be fenced.

More colors are available in recent years for chain link slats, such as brown or green that better blend into the natural landscape that surrounds most of Airport St.

South Perimeter Fence

- Could not withstand strong prevailing winds. Posts lean and sections sag and gape open, a condition that has existed for years.
- Graffiti is not addressed.
- Faces Big Wave Wellness Center
- Compare aesthetics of Pillar Ridge 6-ft fence with brown slats on left, to 8-ft propane fence with red slats.



West Perimeter Fence

2019

Prior to construction of 8-ft fence in summer 2009, the Pillar Ridge 6-ft fence provided security on the north & west, as seen here.



Pillar Ridge fence west of propane yard is set back about 6 ft from property line so maintenance of this enclosed strip is feasible.

This section of propane fence is not leaning.

Invasive pampas/jubata grass

Weed control measures should include a requirement to eradicate jubata grass which infests the site. This highly invasive non-native is perennial and is not killed by mowing. Seed is disbursed by the wind from flower plumes rising above the 8-ft fence.



END

Bulk Propane Facility on Airport St

Incompatible hazardous land use next to medium-high-density Pillar Ridge Manufactured Home Community, an LCP-designated affordable housing site

BETEL:

Early History

1960's – 1990's APN #047-300-050 was empty except for two LPG storage tanks (red arrow).



1964: Mobilehome park was built and lease signed for Buck's Butane to supply LP gas to 227 homes via underground distribution lines from two 7,500-gal storage tanks located in 50x60 ft area next to sewer lift station (red arrow).

1983 Oct: Mobilehome park converted to natural gas when PG&E extended service to area.**1985**: Parcel sold to Buck's Butane.



2000's

Sold and resold to various large national corporations, the use was expanded in the 2000's without permits --

- larger 15,000 gal tank, reoriented and aimed at nearby homes,
- additional storage of used tanks and LPG delivery vehicles,
- 8-ft high perimeter fence with V-shaped barbed wire extensions



June 2004: Explosive Hazard Recommendations for bulk LPG next to Pillar Ridge by Robert Shaw, Consulting Environmental Planner

"The existing stationary propane tank has the capacity of containing 15,000 gallons of propane fuel. HUD charts show a catastrophic accident would result in a 250 ft fire width and height. Any building within 180 ft would be combustible and any person within 900 ft could sustain major burns. Explosion blast overpressure for building and people within 560 ft would be life threatening. In the event of an explosion, since there are mobilehomes as close as 75 ft from the stationary tank, most of the park would be subjected to explosive and/or thermal radiation."



The practice of de-valving the hundreds of tanks rotated in and out of the lot releases the odorant mercaptan causing unnecessary public alarm and repeated wasted time & resources as the Pillar Ridge natural gas system must be investigated to rule out any genuine leaks.

The odorant was leaked so frequently, with the same explanation, that some residents suffered the recurring noxious odor in silence and no longer bothered to report a suspected gas leak.

Pillar Ridge residents were assured these smaller tanks were empty and posed no hazard.

Ruptured propane tank 9/22/17

9/22/2017

Photo was taken by adjacent neighbor after making 911 call, as the explosive leak was tapering off. The large initial cloud drifted north, driving frightened choking residents from their homes.

Email from Cal Fire Assistant Chief Cole on the 9/22 incident: "When the first engine company arrived, they met with AmeriGas personnel who were in the process of decommissioning propane tanks stored on the property. The crew did not observe any leaking or odors of propane and did not see any hazards present." Leak from 15,000-gal tank was determined to be the result of "<u>operator error</u>".

10/3/2017

leak

It is not known how long the tank had been leaking.

Email from Cal Fire Assistant Chief Cole: "The 10/3 event came in as an odor investigation. Upon the arrival of our engine company, they noted gas leaking from a gauge on a 15,000 gal propane tank.

Our crew upgraded the response (2 additional fire engines, and 1 Battalion Commander) and asked for a representative from AmeriGas to report to the scene." Leaking propane vapor is heavier than air. In calm air conditions it flows downhill to collect in low places (such as under mobilehomes) awaiting the first spark to ignite an explosion. The natural grade in this area slopes down towards the south & west (toward Pillar Ridge homes and the Big Wave Wellness Center).



New delivery of tanks – the same unpermitted expansion of use that Violation Notice was issued for in 2017. These also were later removed.



Fire hazard: habitually neglected tall dry weeds

Aug 2018



Nov 2021: new fleet of 5 box trucks with propane bottles stored inside.



Pillar Ridge families are the "sensitive receptors" of this carelessly operated hazardous facility.

Since January 2015, they have asked the County to help them, to protect them, to <u>move the bulk propane facility safely away from them</u>.

MCC has agendized this issue four times since 2017, and submitted comment letters on the CDP application (2018) and revised application (2019), in support of the residents' concerns. Public comment at these meetings, and articles and editorial in the HMB Review have been 100% in support as well. To date (Jan 2022) there has been no hearing to consider the CDP to address the issue.



Manuel Ramirez, Chair and Members of the San Mateo Planning Commission 455 County Center, 2nd Floor Redwood City, CA 94063

Re: Item #5 on the April 27, 2022 Agenda: PLN2018-00057 (Buck's Butane/Amerigas) Coastal Development Permit to legalize unpermitted development at an existing propane storage and distribution facility a 399 Airport Street, Moss Beach

Dear Chair Ramirez and Commissioners:

I am the project engineer for the Big Wave Project. I have very strong objections to permitting a Butane storage and distribution facility in its current location next to the Pillar Ridge residential community and next our proposed housing for our special needs community. It is my understanding that this location was historic and existed in this location prior to the development of the Pillar Ridge neighborhood and it should not be permitted for the following reasons:

- 1. Storage of large volumes (10,000 gallons) of propane/butane is extremely hazardous, especially in uncontained facilities in residential neighborhoods.
- 2. The routine of filling propane/butane releases large quantities of gas and liquid. This causes high levels of local pollution and odor that will impact our sensitive community that is directly downwind of this operation.
- 3. The Coastside community does not need the distribution of propane which in archaic form of energy distribution. The majority of propane services on the Coastside have been replaced by natural gas distribution lines. The few remaining are serviced by another propane dealer located in a remote area. Current global warming goals are to replace fossil fuels and not issue new permits for facilities with a low level on need in a hazardous location.

As an engineering geologist, I have had personal experience with a butane explosion and fire at a Midwest oil refinery. The fire resulted in the loss of life and property. It is a terrifying experience. Propane when released in quantity flows like boiling water downhill in search of an ignition source. The existing 10,000- gallon tank is in a very corrosive and salty environment. The transfer pipe is rusting and does not appear to have any form of emergency closure. The tank does not appear to be adequately strapped to its foundation. The foundation does not appear to be designed for recent seismic technology. The site is uncontained, and a liquid leak will immediately flow off site. The tank bouncing off the foundation or the failure of the transfer pipe due to corrosion or damage could drain the tank. Liquid propane flowing downhill into the Pillar Ridge neighborhood, or our project may cause most of the homes to burn.

One of my first acts as Public Works Director in Pacifica was to get rid of a 500-gallon propane tank for an emergency generator because corrosion and failure could cause it to drain into the storm drain in Linda Mar resulting in an uncontrollable neighborhood fire.

The hazards and pollution caused by these facilities used to be ignored because the need for this type of fuel was greater and the locations of these facilities were more isolated. There is no longer a need for this type of facility. It seems unreasonable to permit a facility given the current emphasis on fire protection, life and safety, earthquake protection, concern for global warming and code compliance.

I urge the Planning Commission to deny the Coastal Permit for the above-described project because it is extremely hazardous, poorly located and poorly designed. It will be out of compliance with the zoning and the requirements of the Bay Area Air Pollution as soon as it is put back into operation.

Sincerely, Scott Holmes

http://www.hmbreview.com/news/amerigas-to-remove-propane-tanks-in-princeton/article_7c7611a8-b9d8-11e7-b8e3-df79096777b2.html

AmeriGas to remove propane tanks in Princeton

By Sara Hayden 16 hrs ago

Home / Local News Stories



People on the Midcoast want to see any remaining propane tanks disappear from a storage facility run by Amerigas. Jame Soja / Review

On Friday, the San Mateo County Planning and Building Department issued a citation to national propane corporation AmeriGas for lack of timely removal of unpermitted tanks from a storage facility along Airport Road. The company removed the tanks on Tuesday.

"It needs to happen yesterday before someone gets killed," Midcoast Community Council member Chris Johnson said.

"We're fully cooperating with staff and moving this forward," assured land-use planner Charles Eadie, working as a consultant for AmeriGas to ensure it complies with county standards.

He noted that it's statistically more likely for someone to be hit by lightning than suffer some consequence in a propane accident. But for some neighbors, recent scares hit too close to home. Some residences are just 75 feet away from the tank facility.

"(There was) a lot of danger for me, and a lot of danger for my children ... It's dangerous for everyone," a mother of three complained.

Propane tank removal was slow because a limited number of licensed specialists were available to do the job, Eadie said. Council members speculated it was because the site — which is located near affordable housing including the Pillar Ridge Manufactured Home Community and pending Big Wave development that would serve adults with special needs — had been conveniently overlooked.

"This is socioeconomic exploitation," Johnson said at a council meeting. "This needs to be fixed immediately, and it would be if it were somewhere else."

Council member Brandon Kwan had a similar sentiment.

"I'm appalled that this got out of hand. There are no excuses. I think because it's unincorporated, people didn't pay that much attention to us, so things happened. You can see the way Princeton just ended up ... like a junkyard," he said.

Eadie countered that the site had been legally permitted for propane tank storage since the 1960s and the impact on people living in affordable housing was inadvertent. In fact, the storage facility was originally installed in part to serve the community before other power options existed.

However, the site's permit only applies to a bulk storage tank that holds up to 15,000 gallons of propane — not the many other tanks that appeared in more recent years.

Pillar Ridge resident Jose Tamez counted up to 150 at one point. Tamez recalls hearing a loud bang recently and thought a plane had crashed. Instead, it was a ruptured propane tank.

"We stopped wondering if there would be an explosion, and started wondering when there would be an explosion," Tamez addressed the council.

AmeriGas representatives said that the tanks were empty. However, some Midcoasters said they fear that they posed dangers and disturbances nevertheless.

Following the Sept. 22 tank rupture, a cloud of white fog rolled in, and a waft of propane scented with ethyl mercaptan drifted northward, driving people from their homes. This also occurred with an Oct. 3 leak that stemmed from the 15,000-gallon storage tank and was due to "operator error." Ethyl mercaptan is added to propane, which is odorless, to help warn people in the event of a gas leak.

These repeated off-gassing odors have caused some people to become complacent and ignore the warning odor, according to Pillar Ridge on-site property manager Paul Bowman.

"It's giving a false positive signal," Bowman said. "Every time we smell mercaptan, (some people) no longer call (for help), which is a huge risk. If they don't call and we have a legitimate gas leak, we could have an explosion or a fire."

Ethyl mercaptan poses health risks of its own. Johnson noted that the chemical is thought to cause coma or even death.

It immediately irritated Pillar Ridge residents' respiratory systems,' and can also cause headache, nausea, weakness, fatigue, incoordination, irritation and altered ability to taste, according to the Center for Disease Control.

Acute exposure could also lead to vomiting, diarrhea, central nervous system depression, respiratory paralysis, pulmonary edema, tremors, seizures, liver and kidney damage and hypertension, according to poison control center resources.

"For that chemical to be allowed to off-gas 24/7 and the residents of Pillar Ridge to be breathing that chemical for years — that is a cumulative effect that could be even more harmful to you than the potential explosion of the propane," Johnson said.

Since removing the smaller storage tanks, AmeriGas officials indicated the bulk storage unit will remain where it stands.

But an environmental consultant's report from 2004 said the 15,000-gallon tank was a potentially lifethreatening hazard that could cause "major burns" and "explosive and/or thermal radiation," for residents — even though it met zoning setback requirements from the property line.

"Is it ideal? No, it's probably not ideal in terms of classic zoning," Eadie said. "This is an industrial zone and this is an industrial use ... If there was another place to relocate, AmeriGas would be open to that, but it's just not that easy to find another place that would be cost-effective to do so. They have as much right to be there as the mobile home park does."

Midcoast Community Council Chair Lisa Ketcham said the county is reviewing options to abate the situation.

"We can't rely on AmeriGas to operate the facility safely," she said.