



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT B

May 6, 2022

Charlie Eadie
PO Box 1647
Santa Cruz, CA 95061
charlie@eadieconsultants.com

Subject: **LETTER OF DECISION**
File Number: PLN2018-00057
Location: 399 Airport Road, Moss Beach
APN: 047-300-050

On April 27, 2022 the Planning Commission considered a Coastal Development Permit, pursuant to Section 6328.4 of the San Mateo County Zoning Regulations, to legalize improvements to an existing propane distribution facility's use on a 1.47-acre parcel located at 399 Airport Road in the unincorporated Moss Beach area of San Mateo County. The project is appealable to the California Coastal Commission.

During the hearing, the applicant retracted the proposal for temporary and periodic storage of used propane tanks on the project site. Based on the applicants' scope modification and information provided by staff and evidence presented at the hearing, the Planning Commission approved the Coastal Development Permit, County File Number PLN 2018-00057, by adopting the required findings and added modifications to the conditions of approval listed in Attachment A.

Any interested party aggrieved by the determination of the Planning Commission has the right of appeal to the Board of Supervisors within ten (10) business days from such date of determination. The appeal period for this matter will end at **5:00 p.m. on May 11, 2022.**

The approval of this project is appealable to the California Coastal Commission. Any aggrieved person may appeal this decision to the California Coastal Commission within 10 working days following the Coastal Commission's receipt of the notice of Final Local Decision. Please contact the Coastal Commission's North Central Coast District Office at 415/904-5260 for further information concerning the Commission's appeal process.

The County and Coastal Commission appeal periods are sequential, not concurrent, and together total approximately one month. A project is considered approved when these appeal periods have expired, and no appeals have been filed.

Please direct any questions regarding this matter to Summer Burlison, Senior Planner at Email: sburlison@smcgov.org. To provide feedback, please visit the Department's Customer Survey at the following link: <http://planning.smcgov.org/survey>

Sincerely,



Janneth Lujan
Planning Commission Secretary

cc: Department of Public Works
California Coastal Commission
Coastside Fire Protection District
City of Half Moon Bay, Planning Director
Midcoast Community Council
Lennie Roberts, Green Foothills
Buck's Propane/Amerigas Propane
Sabrina Brennan
Scott Holmes
Carlyle Ann Young
Michael Ferreira
Gary Trott
Joseph Tamez
Fran Pollard

County of San Mateo
Planning and Building Department

FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN 2018-00057

Hearing Date: April 27, 2022

Prepared By: Summer Burlison,
Project Planner

Adopted By: Planning Commission

FINDINGS

For the Environmental Review, Found:

1. That the project is categorically exempt pursuant to Section 15303, Class 3, of the California Environmental Quality Act (CEQA) Guidelines for new small structures and equipment on an urban lot and Section 15311, Class 11, for placement of minor structures accessory to existing industrial uses including but not limited to signs and small parking lots.

For the Coastal Development Permit, Found:

2. That the project, as described in the application and accompanying materials required by Section 6328.7 and as conditioned in accordance with Section 6328.14, conforms to the plans, policies, requirements and standards of the San Mateo County LCP, specifically with regard to the Locating and Planning New Development and Visual Resources, and Shoreline Access Components of the Local Coastal Program.
3. That the project is located between the nearest public road and the sea and complies with the public access and public recreation policies of Chapter 3 of the Coastal Act of 1976 (commencing with Section 30200 of the Public Resources Code) as nearby accessible trails from Airport Road provide access to vertical public shoreline access points along the Bluff; vertical public access to the Princeton shoreline is available from the street-ends within the Princeton community; and the project does not impact or impede existing shoreline access.
4. That the project conforms to specific findings required by policies of the San Mateo County LCP with regard to the Locating and Planning New Development, Visual Resources, and Shoreline Access Components. Specifically, as proposed and conditioned, the subject approval will satisfy the requirement for a CDP to legalize site improvements to the property and the project location ensures that the improvements are not significantly distinguishable from any points along the designated Cabrillo Highway scenic road due to its distance and intervening development and vegetation from the scenic roadway, and that all activity and structures authorized under the approval are contained within the fenced area which help to minimize visual impacts. Furthermore, the

project has been conditionally approved by the Coastside Fire Protection District and Environmental Health Services and does not impact or impede existing shoreline access in the area.

CONDITIONS OF APPROVAL

Current Planning Section

1. This approval applies only to the proposal, documents and plans described in this report and approved by the Planning Commission on April 27, 2022. The Community Development Director may approve minor revisions or modifications to the project if they are consistent with the intent of, and in substantial conformance with, this approval.
2. The Coastal Development Permit shall expire one (1) year from the date of final approval if the project has not fulfilled all conditions of approval within that time. Any extension to the permit shall require submittal of a request for permit extension and payment of applicable extension fees, no less than sixty (60) days prior to expiration.
3. Any change in intensity of use of a structure may require an amendment to the Coastal Development Permit. An amendment requires an application for amendment, payment of applicable fees, and consideration at a public hearing.
4. Within 60 days of final approval, the property owner shall remove the barbed wire and minimally the outward extending arm of the "V" brackets located atop the existing chain link fence. Notification shall be provided to the Current Planning Section to verify removal in accordance with this condition has been satisfied.
5. The perimeter fencing shall not exceed 6 feet in maximum height, with the option for several strands of barbed wire located vertically above. No portion of the fence, including barbed wire shall project outward from the property.
6. The perimeter fencing slats shall be dark brown or green in color to blend in with the surrounding natural area. The selected color shall be submitted to the Current Planning Section for approval prior to implementation.
7. The property owner shall maintain the perimeter chain link fencing and slats in good condition and perform repairs as necessary. Any repairs and/or maintenance to the fence shall be of like approved color and materials, unless reviewed and approved by the Current Planning Section.
8. The perimeter fence along the north and west sides of the property shall be set back from the existing Pillar Ridge fence to leave a minimum 4 ft. space between fences to enable maintenance.
9. The perimeter fence along Airport Street shall be relocated out of the right-of-way and shall be connected directly to the Pillar Ridge fence at the northeast corner of the property to prevent trespass between fences.
10. Prior to relocation and/or replacement of perimeter fencing, the owner shall submit plans to the Current Planning Section for review and approval by the Planning and Building Department and Department of Public Works. Reviewing considerations include but are

not limited to location, appearance, design, and height changes to ensure compliance with all permit conditions of approval.

11. The property owner is responsible for ongoing maintenance of the property for weed management to minimize fire hazard. Monthly weed management maintenance visits shall be conducted by the owner, or designee, to ensure continuous management is being maintained.
12. A current site operator contact shall be maintained with the Planning and Building Department's Code Compliance Section, Current Planning Section, the Coastside Fire Protection District, and the site manager at the Pillar Ridge Manufactured Home Park.
13. All conditions of approval shall be satisfied within 60 days of final approval, and compliance with all conditions shall be maintained thereafter. Should inspection determine additional measures or action is necessary in order to satisfy any conditions, the owner shall be provided a designated length of time commensurate to the action needed to comply.
14. Failure to maintain compliance with any conditions of approval will result in escalation to the Code Compliance Section for enforcement action and may result in reconsideration of the CDP by the Planning Commission.
15. No parking of vehicles or ~~individual tanks storage~~ shall occur alongside, or within 20 feet, of the north and west property lines nearest the adjacent manufactured home park. No overnight parking of vehicles containing propane or related fuels for storage or delivery is permitted.
16. Onsite parking of vehicles and ~~storage of tanks~~ shall be limited to graveled areas of the site.

Coastside Fire Protection District

17. The Liquefied Petroleum Gas (LPG) Distribution Facility shall follow all applicable requirements in the 2019 California Fire Code, Section 6109, Section 2307 and National Fire Protection Association (NFPA) 58.
18. Address Numbers: The Facility's address number identification shall be conspicuously posted and visible from the street. The letters/numerals for permanent address numbers shall be of 6-inch height with a minimum -inch stroke and of a color which is contrasting with the background. Such letters/numerals shall be illuminated and facing the direction of access.
19. A fuel break or defensible space around the perimeter of the tank to a distance of not less than 10 feet shall be provided and maintained at all times.
20. Emergency access roads shall be designed and maintained to support the imposed load of a fire apparatus weighing at least 75,000 lbs. and shall have a surface providing all weather driving capabilities. Certification by a civil engineer may be required. Grades of less than 15 percent shall be surfaced with a minimum Class 2 aggregate base or equivalent with 95 percent compaction.

21. The tank shall be permanently labeled as to contents and capacity; and placarded, per NFPA 704.
22. Provide a permanent emergency procedures sign, posted in a conspicuous place, that reads:

IN CASE OF FIRE, SPILL OR RELEASE
USE EMERGENCY PUMP SHUT OFF
REPORT THE ACCIDENT
FIRE DEPARTMENT TELEPHONE NO. 911
23. Provide a portable fire extinguisher with a minimum rating of 2-A:20B-C located such that it is no more than 75 feet from the tank and dispenser.
24. Provide a permanent warning sign consciously posted within sight of the fuel dispensing area stating the following:
 - a. No Smoking
 - b. Shut off motor
 - c. Discharge your static electricity before fueling by touching a metal surface away from the nozzle.
 - d. To prevent static charge, do not reenter your vehicle while gasoline is pumping.
 - e. If a fire starts, do not remove the nozzle, back away immediately.
 - f. It is unlawful and dangerous to dispense gasoline into unapproved containers.
 - g. No filling of portable containers in or on motor vehicles. Place container on ground before filling.
25. Gates shall be a minimum of 2 feet wider than the access road/driveway they serve. Overhead gate structures shall have a minimum of 15 feet of vertical clearance. Locked gates shall be provided with a Knox Box or Knox Padlock. Electric gates shall have a Knox Key Switch. Electric gates shall automatically open during power failures. FCF 503.6, 506. For application and instructions please email cfpdfiremarshal@fire.ca.gov.

Environmental Health Services

26. No onsite propane storage shall occur without a valid Certified Unified Permit Agencies (CUPA) permit.
27. No onsite propane storage above 200 cubic feet shall occur without a Hazardous Materials Business Plan filed with Environmental Health Services.



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT C

Application for Appeal

Planning and Building Department

County Government Center • 455 County Center, 2nd Floor
Redwood City • CA • 94063 • Mail Drop PLN 122
Phone: 650 • 363 • 4161 Fax: 650 • 363 • 4849

- To the Planning Commission
- To the Board of Supervisors

1. Appellant Information

Name: Lennie Roberts
Green Foothills

Phone, W: 650-854-0999H: (same)

Address: 339 La Cuesta Drive
Portola Valley, CA

Zip: 94028

2. Appeal Information

Permit Numbers involved:
PLN 2018-00057
(Bucks Butane/Americas)

I have read and understood the attached information regarding appeal process and alternatives.

- yes no

I hereby appeal the decision of the:

- Staff or Planning Director
- Zoning Hearing Officer
- Design Review Committee
- Planning Commission

Appellant's Signature:

Lennie Roberts

Date: May 11, 2022

made on April 27 2022, to approve deny the above-listed permit applications.

3. Basis for Appeal

Planning staff will prepare a report based on your appeal. In order to facilitate this, your precise objections are needed. For example: Do you wish the decision reversed? If so, why? Do you object to certain conditions of approval? If so, then which conditions and why?

Please See Attached

Application for Appeal

Planning and Building Department

County Government Center • 455 County Center, 2nd Floor
Redwood City • CA • 94063 • Mail Drop PLN 122
Phone: 650 • 363 • 4161 Fax: 650 • 363 • 4849

- To the Planning Commission
- To the Board of Supervisors

1. Appellant Information

Name: Mike Ferreira Address: 3921 East Bayshore Suite 204
Sierra Club, Loma Prieta Chapter Palo Alto, CA
 Phone, W: _____ H: 650-563-4030 Zip: 94303

2. Appeal Information

Permit Numbers involved:
PLN 2018-00057
(Bucks Butane/Ameri Gas)

I have read and understood the attached information regarding appeal process and alternatives.

- yes
- no

I hereby appeal the decision of the:

- Staff or Planning Director
- Zoning Hearing Officer
- Design Review Committee
- Planning Commission

Appellant's Signature:

Michael Ferreira (by LCR)

Date: May 11, 2022

made on April 27, 2022, to approve/deny the above-listed permit applications.

3. Basis for Appeal

Planning staff will prepare a report based on your appeal. In order to facilitate this, your precise objections are needed. For example: Do you wish the decision reversed? If so, why? Do you object to certain conditions of approval? If so, then which conditions and why?

Please See Attached

May 11, 2020

Reasons for Appeal. PLN2018-00057 (Bucks Butane-AmeriGas)

In furtherance of our organizations' commitments to environmental justice and equity, and of our ongoing support for the California Coastal Act and the County Local Coastal Program, we are appealing the decision of the Planning Commission to legalize uses at the AmeriGas propane facility on Airport Street. The Planning Commissioners commendably included new fencing and prohibited overnight parking of vehicles containing propane, but were unable to address the existential threat to public health and safety from the 15,000-gallon propane storage tank that was installed without benefit of the required Coastal Development Permit.

Ongoing operations of the AmeriGas facility are a fundamentally incompatible land use at this location, particularly for the families at Pillar Ridge Manufactured Home Community, a low-income community of 227 manufactured homes, and the future residents at Big Wave, a community of 57 housing units for developmentally disabled adults. Both of these communities are sensitive receptors that are at high risk from the propane facility operations due to their location adjacent to the AmeriGas facility.

The 1960's initial service of propane from two smaller tanks on this site to serve the Pillar Ridge site is not a valid basis on which to exempt the 15,000-gallon storage tank and associated operations from requirements for a Coastal Development Permit under the Coastal Act and Local Coastal Program.

Accordingly, we ask that the Board of Supervisors determine that the 15,000-gallon propane storage tank requires a Coastal Development Permit; which should be denied for the reasons stated above.



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT D



0.28 0 0.14 0.28 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere
© Latitude Geographics Group Ltd.

1:9,028



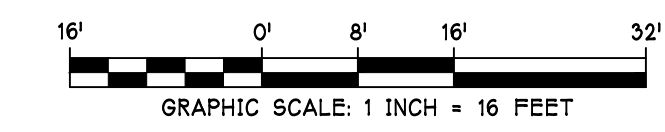
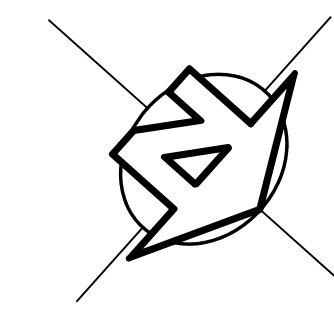
This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT E



Legend

- [] INDICATES RECORD DATA PER 56 PM 22
 - STREET SIGNAGE
 - UTILITY POLE
 - ELECTRICAL BOX
 - BOLLARD
 - OVERHEAD UTILITY LINE
 - FENCE
 - - - PROPERTY BOUNDARY
 - - - EDGE OF TRAVEL WAY
 - EDGE OF PAVEMENT
 - MONUMENT FOUND AS NOTED
- ALL DISTANCES SHOWN ARE IN FEET AND DECIMALS THEREOF.

Basis of Bearings

THE BEARINGS AND COORDINATES SHOWN HEREON ARE BASED UPON THE CALIFORNIA COORDINATE SYSTEM OF 1983, CCS83, ZONE 3, (2010.00) ALSO KNOWN AS NAD83 (2011) IN ACCORDANCE WITH THE CALIFORNIA PUBLIC RESOURCES CODE SECTIONS 8801-8819.

DISTANCES SHOWN HEREON, UNLESS OTHERWISE NOTED, ARE GROUND DISTANCES TO APPROXIMATE CCS83 GRID DISTANCES MULTIPLY THE DISTANCES BY THE COMBINATION FACTOR PROVIDED HEREON.

<p>REVISIONS</p> <p>APPROVED</p>	
<p>INFLAND SURVEY Surveying - Mapping - GPS</p> <p>5300 Soquel Avenue, Suite 101, Santa Cruz, CA 95062 Tel. 831-426-7941 Fax 831-426-6266</p>	
<p>SITE PLAN FOR:</p> <p>Amerigas Facilities</p> <p>Airport Street, Princeton, CA</p>	
<p>PREPARED AT THE REQUEST OF</p> <p>EADIE CONSULTANTS</p>	<p>DATE 08/20/18</p> <p>SCALE 1"=16'</p>
<p>SHEET</p> <p style="text-align: center;">1</p> <p>OF 1 SHEETS</p>	<p>DRAWN</p> <p>VCL</p>
<p>JOB NO. G18031</p>	



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT F

STAFF REPORT - San Mateo County Planning Commission - Meeting of September 10, 1964

SUBJECT: BUCK-JOHN Zoning Amendment - Map 16.1 (5)

REQUEST: To reclassify a portion of Franciscan Heights Subdivision, measuring 50' by 60', located on the southeasterly boundary of the subdivision and 50' removed from Airport Street, as shown on map and legal description submitted by applicant. The applicant wishes to install a bulk storage tank for liquified petroleum gas serving the El Granada Mobile Home Park and residents of the area.

LOCATION: West of the Half Moon Bay Airport and north of Princeton.

ZONING: Franciscan Heights Subdivision, site of the mobile home park, is zoned H-1/S-2 (limited highway frontage--1000 sq. ft. minimum lot area per dwelling unit). The remainder of the area is zoned M-1 (light industrial).

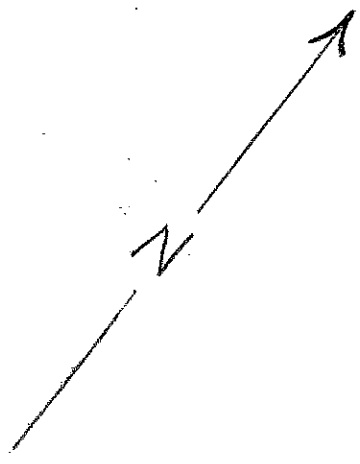
LAND USE: The property under consideration is vacant, as is the land to the south. Nearby a trailer park with about two hundred units is under construction. The Half Moon Bay Airport is across the street from the trailer park.

CIRCULATION: Airport Street, the access route to the trailer park, is a gravelled road. The applicant is installing full improvements with twenty feet of paving along the frontage of the trailer park. A dirt road runs along the southerly side of the trailer park past the proposed tank site.

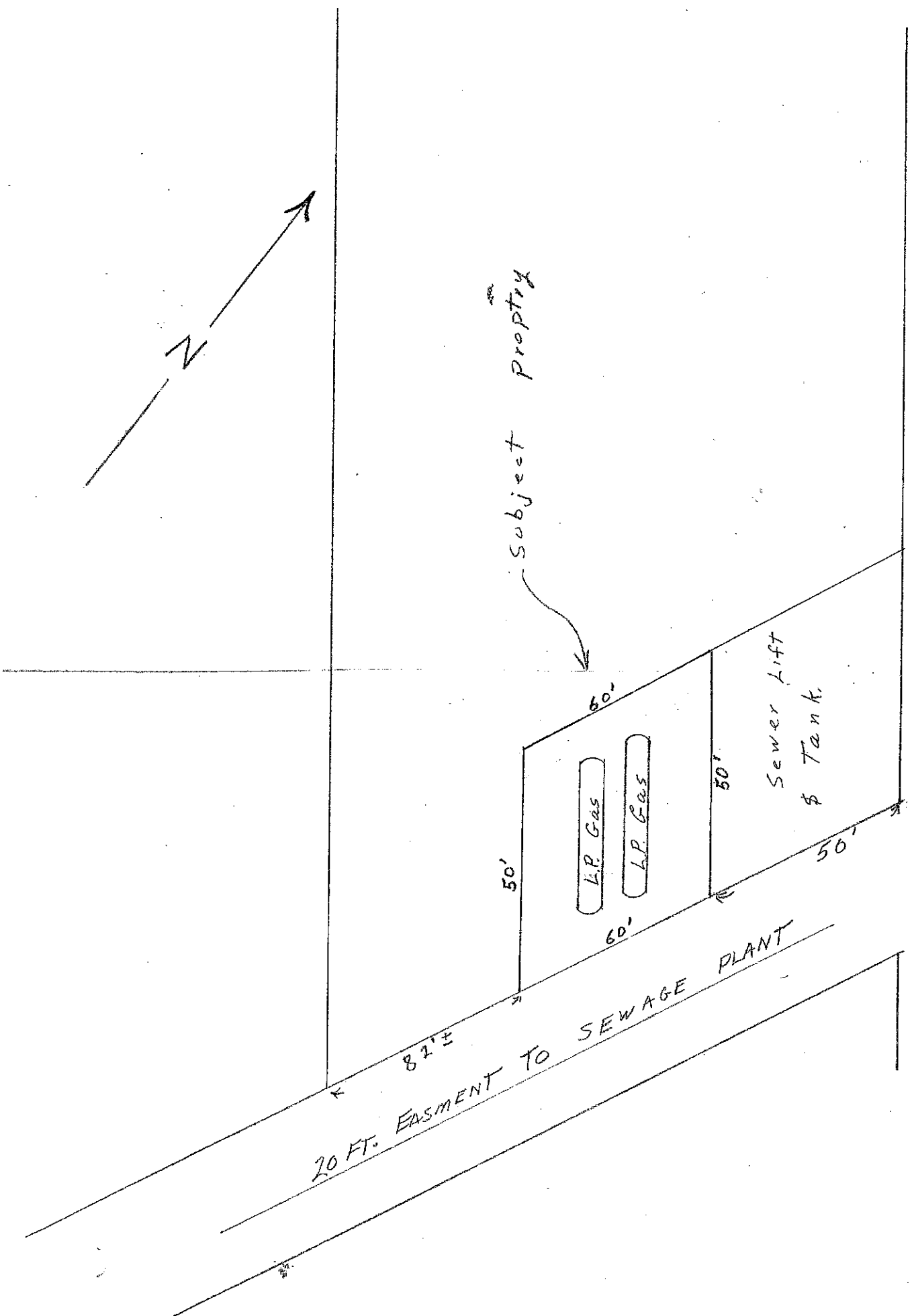
ANALYSIS: This change in zoning district has been requested because the applicant wants to store LP gas to be sold to residents and businesses in the area in addition to the residents of the trailer park. This use appears reasonable and should not interfere with the activities of the trailer park itself.

The Planning Commission may wish to question the access to the tank site; i. e., is the existing dirt road adequate and does the applicant have the right to use the twenty-foot easement it is in. The supply and distribution trucks should not be allowed to go through the trailer park.

The applicant should be aware that retailing of LP gas will not be permitted in the M-1 district.



Subject Property



AIRPORT STREET

20 FT. EASEMENT TO SEWAGE PLANT

L.P. Gas

L.P. Gas

Sewer Lift & Tank

November 27, 1964

Mr. Don Lanktree
Buck-John Corp.
25 Wayland St.
San Francisco, Calif.

Dear Mr. Lanktree:

The Board of Supervisors at their meeting held on the 10th day of November, 1964, approved an amendment to the zoning ordinance so as to reclassify a portion of Franciscan Heights Subdivision, measuring 50'x60', located on the SEly boundary of the Subdivision and 50' removed from Airport St., from H-1/S-2 (limited highway frontage - 1000 sq. ft. min. lot area per dwelling unit) district to an M-1 (light industrial) district.

This ordinance shall become effective from and after thirty days after its passage.

Very truly yours,

Reino Liukkonen,
Planning Director

By

Henry A. Johnson
Senior Planner

HAIjac
cc: County Assessor's Office



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT G



Supporting Statement/Project Description

Amerigas Facility
Airport Road, Princeton

The proposed project is to obtain a Coastal Development Permit to recognize the current configuration of the storage yard and the existing fence on the permitted bulk storage propane facility.

The existing security fence proposed for recognition is chain link with redwood color slats, a style consistent with industrial uses. The fenced area is maintained with a gravel base which is proposed to remain.

The fenced area includes also two metal sea-land containers for tools and miscellaneous storage, and a water tank, all of which will remain on site.

Previously the site was also used as temporary storage for spent propane containers of various sizes with cleaning and occasional flaring to clear content. Per the County's request, that function has been stopped and is not proposed.

Instead, Amerigas proposes that the storage yard also serve as a depot limited to containers that meet the Dept. of Transportation requirements for transport over roads without special permits. Specifically, this limits containers only to those that are empty or nearly empty (maximum 5% content.) The exact number of empty containers on site would vary, but in no case would be more than 100. No internal cleaning or flaring would take place and unlike the past situation, no tanks requiring special transport would be stored on site.

The containers at this location would be transported to and from existing and new customers in the local service area. Thus, this use of the site brings efficiency by localizing the storage proximate to the customer base.

Without the depot use, tanks would have to be transported to and from San Jose, which would substantially increase vehicle miles traveled (VMT), costs and delivery time. Considering the County and state efforts to reduce greenhouse gases resulting from VMT, this use of the site would be environmentally beneficial.



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT H

Midcoast Community Council

representing Montara, Moss Beach, El Granada, Princeton, and Miramar
P.O. Box 248, Moss Beach, CA 94038-0248 - www.MidcoastCommunityCouncil.org

Claire Toutant . Len Erickson . Dave Olson . Barbra Mathewson . Dan Haggerty . Tamar Powell . Michelle Weil
Chair Vice Chair Secretary Treasurer

Date: July 10, 2019

To: Summer Burlison, Project Planner

cc: Supervisor Don Horsley
Steve Monowitz, Community Development Director
Jeannine Manna, CCC North Central Coast District Manager

From: Midcoast Community Council/ Claire Toutant, Chair

Subject: **Airport Street Bulk Propane Facility, PLN2018-00057**

Thank you for the referral on the revised scope for this after-the-fact Coastal Development Permit to legalize site additions and expanded use at the bulk propane facility on Airport Street.

Sept 2018 MCC comments covered (see attached):

- hazards and social justice implications of this incompatible land use so close to medium-high-density residential (Pillar Ridge);
- long history of odors and leaks, and operator dissembling to all concerned about the contents of the smaller tanks;
- perimeter fence specific comments, to which we would add that the side along Airport St appears to be located in the right-of-way and unnecessarily crowds the sidewalk. If the fence could leave space for a shelter at the bus stop, we are told Pillar Ridge would pay for the installation.

Updates since that time include:

- Feb 2019: more truckloads of tanks delivered and stored onsite;
- permitting process delayed through lack of progress on the part of the applicant;
- routine neglect of tall dry annual weeds until the situation is reported.

The revised project scope, to legalize the expanded use of storing individual customer tanks, would result in essentially no change from the unsafe conditions brought forward by the residents of Pillar Ridge in Jan 2015¹ and further documented with presentations and testimony at MCC in Jan² and Oct³ 2017. In the past, residents were always told the smaller tanks were empty and posed no hazard. Resident testimony⁴ and photos at our Oct 2017 meeting of the explosive gas leak due to mis-handling of those tanks showed that to be a lie. Understandably, the residents don't trust that the current proposal will be any different.

Given the incompatible use, the record regarding dangerous operator errors, dissembling to authorities, and disregard for the permitting process, **MCC is opposed to allowing the "grandfathered" use of the bulk storage tank to continue in this location, and even more so, to allowing an expansion of the use as a depot for smaller tanks.**

¹ Email to Supervisor Horsley, 1/15/15,

www.midcoastcommunitycouncil.org/storage/issues/plns/2015-01-15-email-propane.pdf

² www.midcoastcommunitycouncil.org/storage/mtgs-com2017/2017-01-propane-yard.pdf

³ www.midcoastcommunitycouncil.org/storage/mtgs-com2017/2017-10-11-propane-yard-slides.pdf

⁴ Minutes, 10/11/17,

www.midcoastcommunitycouncil.org/storage/mtgs-com2017/2017-10-11-MCC-minutes.pdf

Midcoast Community Council

representing Montara, Moss Beach, El Granada, Princeton, and Miramar
P.O. Box 248, Moss Beach, CA 94038-0248 - www.MidcoastCommunityCouncil.org

Dave Olson . **Claire Toutant** . **Lisa Ketcham** . **Dan Haggerty** . **Chris Johnson** . **Brandon Kwan** . **Barbra Mathewson**
Chair Vice-Chair Secretary Treasurer

Date: September 26, 2018

To: Summer Burlison, Project Planner

cc: Supervisor Don Horsley
Steve Monowitz, Community Development Director
Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Dave Olson, Chair

Subject: **Airport Street Bulk Propane Facility, PLN2018-00057**

Thank you for the opportunity to comment on the referral for this CDP application to legalize the propane facility site additions including perimeter fence, gravel, 2 storage containers and 8-ft diameter water tank.

The “grandfathered” 15,000 gal LPG tank is located 75 feet from the nearest row of homes at the designated affordable housing community of Pillar Ridge, where 227 mostly low-income families with local jobs own their modest, closely-spaced homes on rented land. Residents have endured decades of expanded unpermitted hazardous activities at this facility, with frequent and sometimes lengthy periods of what they were told was odorant release from empty tanks, until mishandling of an “empty” tank in Sept 2017 caused an explosive leak with a visible gas cloud driving nearby residents choking from their homes. This was followed within a month by a leak from the large tank of unknown duration caused by “operator error”.

In addition to the environmental justice implications of this incompatible hazardous land use, external hazards of this site include location in the airport safety zone and the tsunami inundation zone.

For the public health, safety and welfare, this facility should be moved to a more suitable location, away from vulnerable residents and external hazards.

NFPA Chapter 58, Liquefied Petroleum Gas Code, requires a written LPG Fire Safety Analysis (FSA) which emphasizes avoiding product release using technology and training. Has Amerigas ever submitted a FSA to facilitate a cooperative dialogue with local emergency response agencies and authorities? Have they complied with NFPA 58 in regard to LPG storage container safety features (including retrofit requirements) and operator training? The track record at this facility suggests they have not.

The perimeter fence should be no taller than 6 feet and barbed wire should be limited to a few strands directly above, such as the adjacent MWSD pump station. NFPA 58 only requires a 6-ft fence, and only around the actual propane facility, or alternatively, lock-in-place devices to prevent unauthorized operation. The unpermitted fence is an

oppressive view-blocking 8 feet topped with V-shaped brackets with multiple strands of barbed wire extending out over the sidewalk fronting the community and over the northern neighbor's yard, where the whole fence is sagging. Pillar Ridge 6-ft perimeter fence pre-existed along two sides of the facility, and the space between the fences is difficult to maintain.

Invasive jubata grass infests the propane yard and should be eradicated.

