



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
Governor

November 4, 2019

Governor's Office of Planning & Research

Mr. Jim Alves, Associate Civil Engineer
City of Modesto
P.O. Box 642 (1010 Tenth Street)
Modesto, California 95353

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STATE CLEARINGHOUSE

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF MODESTO WATER
MASTER PLAN – DATED OCTOBER 15, 2019 (STATE CLEARINGHOUSE NUMBER:
2016082069)

Dear Mr. Alves:

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report for the City of Modesto Water Master Plan (EIR).

The City of Modesto (City) developed the Water Master Plan (WMP) to define the City's long-term water supply and infrastructure needs and guide management of its water service system. The WMP identifies recommended and prioritized capital improvement projects for system-wide implementation needed to deliver safe and reliable water and meet water demand requirements for existing and future City customers through buildout of the City's adopted General Plan. The key components of the City's water system are storage tanks and booster pump stations, groundwater wells, wellhead treatment, and a transmission/distribution pipeline network.

DTSC recommends that the following issues be evaluated in the EIR, Hazards and Hazardous Materials section:

1. The EIR should acknowledge the potential for historic project site activities to have resulted in the release of hazardous wastes/substances. In instances in which releases have occurred, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.

In addition to anticipating contaminants discovered while performing work for system infrastructure at specific sites, the City should have plans in place for any incidental hazardous wastes/substances encountered while installing piping for water distribution systems. The Health and Safety Plan developed for site workers should include protocol for cases in which suspected contamination is encountered. Additionally, a Soil Management Plan should be in place to ensure proper disposal for any contaminated soil.

2. If buildings or other structures are to be demolished on any project sites included in the WMP, surveys should be conducted to investigate for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling should be conducted in accordance with DTSC's 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers* (https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance_Lead_Contamination_050118.pdf).
3. If any projects initiated as part of the WMP require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 *Information Advisory Clean Imported Fill Material* (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf).
4. If any sites included as part of the WMP have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 *Interim Guidance for Sampling Agricultural Properties (Third Revision)* (<https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf>). In addition, sampling should be conducted in accordance with DTSC's 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers* (https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance_Lead_Contamination_050118.pdf).

DTSC appreciates the opportunity to review the Draft EIR. Should you need any assistance with an environmental investigation, please submit a request for Lead Agency Oversight Application, which can be found at: https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/VCP_App-1460.doc. Additional information regarding voluntary agreements with DTSC can be found at: <https://dtsc.ca.gov/brownfields/>.

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If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gavin McCreary", with a stylized flourish at the end.

Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

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