

From: [Pease, Kathy](#)
To: [Natalie Noyes](#); [Morris, Erin](#)
Subject: FW: DTSC Comments - Draft EIR Valle Verde and Heritage House Continuum of Housing Project
Date: Monday, August 19, 2019 9:53:42 AM

Sent from [Mail](#) for Windows 10

From: Ahrling, Ryan@DTSC <Ryan.Ahrling@dtsc.ca.gov>
Sent: Monday, August 19, 2019 9:44:55 AM
To: Pease, Kathy <kpease@cityofnapa.org>
Subject: DTSC Comments - Draft EIR Valle Verde and Heritage House Continuum of Housing Project

[EXTERNAL]

Hello Ms. Kathy Pease,

I represent the Department of Toxic Substance Control, a responsible agency, reviewing the Draft Environmental Impact Report (EIR) for the Valle Verde and Heritage House Continuum of Housing Project. Upon review of the document DTSC requests the following comments be addressed in the revised EIR:

- The scope of the report does not include historical land uses at the site. Based on my review of the Phase-I Environmental Site Assessment conducted by Basics Environmental, Inc. in December 2014, it appears that the Phase-I Environmental Site Assessment provides historical information on the project site. This historical information should be summarized within the Environmental Impact Report. Furthermore, any former land uses that may pose a threat to human health or the environment should be discussed within the Hazards and Hazardous Materials section.
- Past uses of the project site described within the Phase-I Environmental Site Assessment (Basics 2014) includes agricultural land, which reportedly most likely consisted of vineyards. The site was reportedly developed with agricultural land from at least the 1940s to the 1960s. Page 121 of the Draft Environmental Impact Assessment states “Pesticides and herbicides may have been used on-site as part of the past agricultural operations on-site between the 1940s and 1960s. Information from the County Agricultural Department revealed these chemicals do not persist in the soil and ground water and will break down over time. Given the substantial time (over 50 year) since the site was used for agricultural purposes and the nature of the chemical degradation, the Phase I ESA concluded the probability of pesticides or herbicides within the soil and/or groundwater is low and would not pose a risk for construction workers.” Given the nature of the future use of the site (residential), DTSC recommends that for added confidence environmental sampling be conducted at the project site to confirm that pesticides and/or herbicides do not remain within media at the project site.
- As part of the proposed project the report notes that renovations to the current building as well as the construction of a residential building is planned. The Draft Environmental Impact Report does not discuss potential hazardous materials associated with construction activities. Construction activities typically utilize hazardous materials (paints, petroleum products, etc.). These materials if handled improperly may adversely affect human health and the environment. Please provide a description of best management practices that will be implemented as part of hazardous materials manifestation during construction activities.
- The previous Phase-I Environmental Site Assessment (Basics 2014) notes that two elevator motor units are located within the current vacant building. In addition, Basics reportedly observed a 55-gallon hydraulic oil steel drum. Will elevators be replaced during renovation?

Will new elevators be installed within the newly constructed building? Often elevators utilize hydraulic fluid during maintenance. Please include additional information within the EIR regarding the proposed demolition/construction of the elevators. Please also address handling of the hazardous materials associated with the elevators.

- The previous Phase-I Environmental Site Assessment (Basics 2014) notes the use of a diesel backup generator located on the southeast side of the project site. Please address the past, current, and future use of the backup generator within the Environmental Impact Report.
- The previous Phase-I Environmental Site Assessment (Basics 2014) notes the use of an onsite domestic water well located within the middle of the project site. The domestic well is reportedly housed within a shed with an associated aboveground storage tank on a concrete pad. The domestic well was reportedly utilized for irrigation purposes only. Please discuss the current and future uses of the domestic water well. Groundwater wells often serve as conduit to the subsurface. Please discuss past uses of the property in relation to the groundwater well and advise on the risk of contamination to groundwater.

Please feel free to reach out with any questions or concerns.

Best,
Ryan Ahrling

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