



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
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8800 Cal Center Drive
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Gavin Newsom
Governor

July 30, 2019

Governor's Office of Planning & Research

JULY 30 2019

STATE CLEARINGHOUSE

Ms. Angie Nichols
Operations Technician
Facilities, Maintenance
Washington Unified School District
930 Westacre Road
West Sacramento, California 95691

DRAFT INITIAL STUDY AND CONSISTENCY EVALUATION FOR THE
FALLBROOK/WESTMORE OAKS MODERNIZATION PROJECT,
1504 FALLBROOK STREET, WEST SACRAMENTO, YOLO COUNTY
(SCH #2019079031)

Dear Ms. Nichols:

The Northern California Schools Unit of the Department of Toxic Substances Control (DTSC) has reviewed the draft Initial Study and Consistency Evaluation (IS) and proposed Mitigated Negative Declaration (MND) for the Fallbrook/Westmore Oaks Modernization Project (Project) proposed by the Washington Unified School District (District). The due date to submit comments is August 8, 2019.

As reported in the IS, the proposed Project would modernize the existing Washington Middle College High School campus located at 1504 Fallbrook Street in the city of West Sacramento, Yolo County (Site), and convert it to a K-8 school campus. The proposed project is intended to modernize the existing school campus to meet current building code requirements, and to provide an improved learning environment that better meets the needs of today's student body.

Based on a review of the IS, DTSC would like to provide the following comments:

1. If the District plans to use State funds for the Project, then the District shall comply with the requirements of California Education Code, sections 17210, 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268. If the District is not using State funds for the Project, or is otherwise specifically exempted under section 17268, DTSC recommends the District continue to investigate and clean up

the site, if necessary, under the oversight of Yolo County and in concurrence with all applicable DTSC guidance documents.

A local education agency may also voluntarily request the California Department of Education (CDE) site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC review and approval prior to its final approval, except when exempt under section 17268.

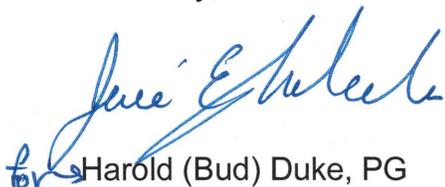
2. Because the Project is school site related, DTSC recommends that a Phase I Environmental Site Assessment and/or (as appropriate) a Preliminary Environmental Assessment be conducted to determine whether there has been or may have been a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present based on reasonably available information about the property and the area in its vicinity. Such an environmental review should generally be conducted as part of the California Environmental Quality Act (CEQA) process. Also, such an environmental review is recommended for compliance with the requirements of California Education Code, section 17268(a) or 17213(a). If the District elects to proceed to conduct an environmental assessment for the Site under DTSC oversight, it should enter into a Voluntary Cleanup Agreement with DTSC to oversee the preparation of the environmental assessment.
3. The presence of existing, older or former structures at the Site may result in potential environmental concerns due to lead from lead-based paint and/or organochlorine pesticides from termiticide applications and polychlorinated biphenyls (PCBs) from electrical transformers, light ballast or window caulking or glazing. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006"*, and in accordance with the recommendations provided in the United States Environmental Protection Agency's website *"PCBs in Caulk in Older Buildings"* (<http://www.epa.gov/pcbsincaulk/index.htm>).
4. If the Site is, or was previously, used for agricultural purposes, pesticides (such as DDT, DDE, and toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the *"Interim Guidance for Sampling Agricultural Soils (Third Revision)"*, dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.

5. If fill material exists on the Site, DTSC recommends these areas be investigated and possibly mitigated in accordance with DTSC's "Information Advisory, Clean Imported Fill", dated October 2001.
6. If a response action is required based on the results of the above investigations, and/or other information, the IS/MND will require an analysis of the potential public health and environmental impacts associated with any proposed response action, pursuant to requirements of CEQA (Pub. Resources Code, Division 13, section 21000 et seq.), and its implementing Guidelines (California Code of Regulations, Title 14, section 15000 et seq.), prior to approval or adoption of a CEQA determination for the Project. A discussion of the mitigation and/or removal actions, if necessary, and associated cumulative impacts to the Project properties and the surrounding environment, should be included in the IS/MND. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to the Project properties and the surrounding environment, are not available for inclusion in the IS/MND, then an Addendum or Supplement to the IS/MND may be required.

DTSC is also administering the Revolving Loan Fund (RLF) Program which provides revolving loans to investigate and clean up hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

For additional information on DTSC's Schools process or RLF Program, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (916) 255-3695, or via email at bud.duke@dtsc.ca.gov.

Sincerely,



for Harold (Bud) Duke, PG
Northern California Schools Unit
Site Mitigation and Restoration Program

cc: (see next page)

Ms. Angie Nichols
July 30, 2019
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cc: (via email)

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