

**From:** [Roman.Isabella@DTSC](mailto:Roman.Isabella@DTSC)  
**To:** [Joe Mateer](#)  
**Subject:** Arcata Community Health Center at Sunset and Foster Avenues Initial Study Comments  
**Date:** Friday, September 20, 2019 9:57:07 AM

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Hello Mr. Mateer,

I represent a responsible agency reviewing the Draft Initial Study for the Arcata Community Health Center at Sunset and Foster Avenues.

The document states that the project Site had previously been used as a lumber mill and for agricultural purposes. These past land uses are Recognized Environmental Conditions (RECs) that indicate the potential presence of contamination. In addition to these RECs, the project (a health center) is proposed to serve a sensitive population. These factors emphasize the importance to fully characterize the Site before development.

Several Phase 1 Environmental Site Assessments (ESAs) and Phase 2 ESAs were conducted for the Site, however none of these are included as an appendix to the text. The hazards and hazardous materials section is missing pertinent information related to current contamination on Site instead referring to the Phase 2 ESA for more information, yet this Phase 2 is not included in the data package received and is not on the CEQAnet website. Please provide the ESAs as an appendix to the text and reference any relevant information in the Hazards and Hazardous Materials section. It is stated that “the site is free of hazardous levels of the constituents tested.” Without having access to the Phase 2 (or any specific information in the hazards section), there’s no way to know which screening levels and/or risk assessments were used to make this determination, what analyses were run, sample locations and depths etc.. On page 40 the text states that TPHd, TPHmo and metals were identified in soil. Which metals were not specified. It is also stated that “The site has been surveyed for pre-existing hazardous materials from former mill operations.” Was the site analyzed for contaminants associated with agricultural use such as pesticides and herbicides? These are some examples of the questions that go unanswered without access to the ESAs or a summary including these specific details in the hazards section.

In addition to providing this information, we would suggest revisiting the Phase 2 ESA to ensure adequate samples were taken to address all potential issues with the Site (locations, depths, analyses for all constituents of potential concern etc.). If all areas and aspects of the Site have not been properly characterized, we would suggest collecting more samples or conducting another Phase 2 ESA.

Due to known contamination in the soil, it is stated that this will be incorporated into preparation of the Stormwater Pollution Prevention Plan (SWPPP). Additionally, a Soil Management Plan, Dust Control Plan and Health and Safety Plan should be prepared to ensure protection of workers and the surrounding community (including two schools within a quarter mile).

Please feel free to contact me if you have any questions or concerns.

Sincerely,

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