November 15, 2019

Mr. Matthew C. Bassi
Planning Director
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Wildomar, California 92595
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INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION, SAINT FRANCIS OF ROME CHURCH, WILDOMAR (PLANNING APPLICATION NO. 19-0017)

Dear Mr. Bassi:

The Department of Toxic Substances Control (DTSC) received your Initial Study and Negative Declaration for Saint Francis of Rome Church project located at 21591 Lemon Street in Wildomar.

The project proposes onsite and offsite improvements which include (1) converting the existing church to a multi-purpose building, (2) removing the existing modular classrooms, (3) constructing a total area of 27,393-square-foot for church, office and classroom/meeting room, and (4) reconstructing the parking lot with additional parking spaces.

DTSC reviewed the Initial Study and has the following comments for Section 9, Hazards and Hazardous Materials:

1. Phase I Environmental Site Assessment (Phase I ESA) stated that the project site had been historically used for agricultural purposes from approximately 1938 until 1961 when orchards were removed from the project site. The Phase I ESA recommended no further investigations justifying that the risk of residual soil contamination was and would be reduced by grading activities. DTSC disagrees with this recommendation for the following reasons:

   a. Residual chemical related chemicals (including organochlorine pesticides, herbicides and metals) may be found in the soil due to past agricultural use. Emissions of the potential soil impacted by agricultural related chemicals during the soil stockpiling and transportation should be evaluated in the Initial Study for construction activities.
b. Transportation of soil potentially impacted by agricultural related chemicals should also be discussed in the Initial Study. If agricultural related chemicals are detected during the investigation, excavated soil should be segregated, characterized, transported and disposed in accordance with all applicable laws and regulations.

2. If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals such as lead-based paints or products, mercury, and asbestos containing materials. If other hazardous chemicals are identified, proper precautions should be taken during demolition activities and in accordance with all applicable ordinances, regulations and laws.

3. Any investigation and/or remediation (e.g. excavation) shall be conducted under a workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup.

4. If backfilling activities are required, DTSC recommends the imported fill materials be characterized in accordance with the Information Advisory Clean Imported Fill Material to minimize the possibility of introducing contaminated soil onto a site. The Information Advisory can be found at: https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf.

DTSC appreciates the opportunity to review the Initial Study. Should you need any assistance in environmental investigation, please submit a request for Lead Agency Oversight Application which can be found at: https://dtsc.ca.gov/brownfields/voluntary-agreements-quick-reference-guide/.

Should you have any questions regarding this letter, please contact me at (714) 484-5392 or by email at ChiaRin.Yen@dtsc.ca.gov.

Sincerely,

Chia Rin Yen
Environmental Scientist
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program

cc: See next page
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    Schools Evaluation and Cleanup Team Reading File – Cypress Office