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Department of Toxic Substances Control

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February 19, 2020

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Mr. Daniel E. Kramer
Petralogix Engineering, Inc.
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Galt, California 95632

STATE CLEARINGHOUSE

NOTICE OF COMPLETION OF A MITIGATED NEGATIVE DECLARATION FOR THE AMERICAN RIVER COLLEGE – NATOMAS CENTER PHASE 2 & 3 PROJECT, DEL PASO ROAD AND NEW MARKET DRIVE, SACRAMENTO, SACRAMENTO COUNTY (SCH #2020019063)

Dear Mr. Kramer:

The Northern California Schools Unit of the Department of Toxic Substances Control (DTSC) has received the Notice of Completion (NOC) for an Initial Study (IS) and Mitigated Negative Declaration (MND) for the American River College – Natomas Center Phase 2 & 3 Project proposed by the Los Rios Community College District (District). The due date to submit comments is February 22, 2020.

As reported in the NOC, the District is proposing to construct a new instructional building (Phase 2 and 3 of the Facilities Master Plan) at the American River College (ARC) Natomas Center campus located at 2421 Del Paso Road, Sacramento, California (Site). The area proposed for Phase 2 and 3 buildout is adjacent, east, of the existing Phase 1 ARC Natomas Center instructional building, in the currently vacant northeast portion of the Site. The proposed construction would be a 49,800-gross square-foot building. The District is additionally proposing to add several parking stalls adjacent the instructional building, and a new parking area with 564 parking stalls west of the existing campus.

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

1. Because the project is school site related, DTSC recommends that an environmental review, such as a Phase I Environmental Site Assessment and/or 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 areas in its vicinity. Such an environmental

review should generally be conducted as part of the California Environmental Quality Act (CEQA) process. If the District elects to proceed and conduct an environmental assessment at the Site under DTSC oversight, it should enter into a Voluntary Cleanup Agreement with DTSC to oversee the preparation of the environmental assessment.

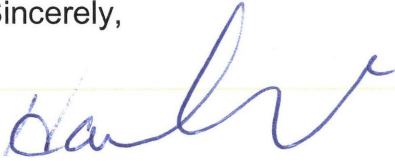
2. The presence of existing, older or former structures at the Site may result in potential environmental concerns due to lead from lead-based paint and/or organochlorine pesticides from termiticide applications and polychlorinated biphenyls from electrical transformers, light ballast, window caulking 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 (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Guidance_Lead_Contamination_050118.pdf), and in accordance with the recommendations provided in the United States Environmental Protection Agency's website "Polychlorinated Biphenyls (PCBs) in Building Materials" (<https://www.epa.gov/pcbs/polychlorinated-biphenyls-pcbs-building-materials>).
3. If the Site is, or was previously, used for agricultural purposes, pesticides (such as Dichlorodiphenyltrichloroethane [DDT], Dichlorodiphenyldichloroethylene [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)* (<https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf>) dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.
4. 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* (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf), dated October 2001.
5. 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 the California Environmental Quality Act (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 MND, then an Addendum or Supplement to the final 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,



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

cc: (via email)

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