



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Director
8800 Cal Center Drive
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Gavin Newsom
Governor

April 6, 2020

Governor's Office of Planning & Research

Mr. Brian Winstead
Superintendent
Enterprise Elementary School District
1155 Mistletoe Lane
Redding, California 96002

APR 07 2020

STATE CLEARINGHOUSE

NOTICE OF COMPLETION OF DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR THE ENTERPRISE ELEMENTARY SCHOOL DISTRICT, MISTLETOE ELEMENTARY SCHOOL PROJECT, 1225 MISTLETOE LANE AND 1186 AND 1220 DEL MONTE STREET, REDDING, SHASTA COUNTY, CALIFORNIA

Dear Mr. Winstead:

The Northern California Schools Unit of the Department of Toxic Substances Control (DTSC) has received the Notice of Completion (NOC) for a draft Initial Study and Mitigated Negative Declaration (IS/MND) for the Mistletoe Elementary School Project proposed by the Enterprise Elementary School District (District). Although the due date to submit comments was April 5, DTSC respectfully submits the following comments for your consideration.

As reported in the NOC, the proposed project is for the construction of a gymnasium, operations and maintenance building, an athletic field, bus parking area and a new drive aisle between the existing Mistletoe Elementary School driveway and Del Monte Street (Project). This new drive aisle will allow for better site circulation during drop-off and pick-up times for the school students. The project site is approximately five acres in size, adjoins to the south the existing Mistletoe Elementary School campus and is located at 1225 Mistletoe Lane 1186 and 1220 Del Monte Street in the City of Redding, Shasta County, California (Site).

In addition, the District submitted for DTSC's review on December 3, 2019 a Phase I Environmental Site Assessment (Phase I – Sharrah Dunlap Sawyer, Inc., July 12, 2019). Based on DTSC's review of the Phase I, DTSC identified environmental conditions of concern from unknown fill material sources, naturally occurring asbestos and unevaluated potential sources that may have impacted the Site. As a result, DTSC issued a determination on December 19, 2019 that a Preliminary Environmental Assessment (PEA) was necessary to determine whether a release or threatened

release of hazardous substances or naturally occurring hazardous material may pose a threat to public health or the environment.

Based on a review of the NOC, 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 (CDE), 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 Shasta County and in concurrence with all applicable DTSC guidance documents.

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

2. As directed in its December 19, 2019 determination letter, DTSC recommends that a PEA be conducted to determine whether there has been or may have been a release or threatened release of a hazardous substance, 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 process. If the District elects to proceed and conduct an environmental assessment at the Site under DTSC oversight, it should enter into an Environmental Oversight Agreement with DTSC to oversee the preparation of the environmental assessment.
3. As it appears that 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.
4. The Site appears to be located within 10-miles of geological units potentially containing naturally occurring asbestos (NOA). Pursuant to DTSC's *Interim Guidance – Naturally Occurring Asbestos at School Sites, Revised September 24, 2004* (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMBRP_POL_Guidance_Schools_NOA.pdf), these environmental concerns should be investigated to determine whether a naturally occurring hazardous material (e.g., NOA) is present, based on reasonably available information about the property and the area in its vicinity.
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.

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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 MND. If enough 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, P.G.
Northern California Schools Unit
Site Mitigation and Restoration Program

cc: (see next page)

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AND 1220 DEL MONTE STREET, REDDING, SHASTA COUNTY, CALIFORNIA

Reviewed by: _____/_____/_____/_____
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