



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

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**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

December 27, 2024

Dr. John Puglisi  
Superintendent  
Rio School District.  
1800 Solar Drive  
Oxnard, CA 93030  
[jpuglisi@rioschools.org](mailto:jpuglisi@rioschools.org)

RE: SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE RIO DEL VALLE MIDDLE SCHOOL EXISTING CAMPUS EXPANSION MASTER PLAN DATED NOVEMBER 20, 2024, STATE CLEARINGHOUSE NUMBER [2022060117](#)

Dear Dr. John Puglisi,

The Department of Toxic Substances Control (DTSC) has received the Supplement Environmental Impact Report (SEIR) for the Rio Del Valle Middle School (RDVMS) Existing Campus Expansion Master Plan (Project). The Project includes the expansion of the RDVMS campus located at 3100 Rose Avenue in unincorporated County of Ventura. The existing campus is approximately 30.2 acres, including the 20.2-acre main campus (APN 144-0-110-445) and 10 acres of active agricultural lands (a portion of APN 144-0-110-225) to the north of the main campus buildings. The proposed Project would add approximately 11.3-acres to the south (a portion of APN 144-0-110-590) that the Rio School District (RSD) proposes to develop with new educational and support facilities, resulting in an approximately 41.5-acre campus (Project Site).

The proposed modified Project includes development within the expanded campus which would occur in phases and would include options for: new classrooms, library and media center, multi-purposed building, student transportation and parking facilities,

student bus turnout, recreational facilities including two basketball courts, baseball field, softball field, a “flex” multi-sport playfield, which can be configured into a soccer field and or a baseball field as needed, four sand volleyball courts, an athletic restroom/storage building, and up to ten tennis courts and/or pickleball courts. The buildout of the RDVMS Existing Campus Expansion Master Plan is anticipated to occur over approximately five years.

On May 25, 2022, RSD entered into an [Environmental Oversight Agreement \(EOA\) \(Docket No. HAS-FY21/22-135\)](#) with DTSC for oversight of an environmental investigation for the 11.1-acre portion of the Project Site. RSD conducted a Preliminary Endangerment Assessment (PEA) Equivalent Report (Phase I Environmental Site Assessment, Tetra Tech, September 23, 2021, and Phase II Environmental Site Assessment, Tetra Tech, September 24, 2021), and a Supplemental Site Investigation (SSI) (Tetra Tech, September 26, 2022), to evaluate and investigate an 11.1-acre portion of Assessor’s Parcel No. (APN) 144-0110-590. The SSI concluded that the Site soil is impacted with organochlorine pesticides (OCPs) and total petroleum hydrocarbons (TPHs) and recommended step out sampling to assess the lateral extent of contamination. On October 27, 2022, DTSC concurred with this conclusion and recommendation and approved the SSI. On June 22, 2023, DTSC approved a Technical Memorandum Housekeeping Action Plan (Tetra Tech, June 12, 2023) for further investigating the Site. As of today, this proposed work has not been completed. On December 20, 2024, Tetra Tech notified DTSC that the sampling activities would be conducted during the week of January 6-10, 2025, and the final report will be available by the middle of March 2025. DTSC has the following comments:

1. On June 22, 2022, DTSC provided [comments](#) on the Notice of Preparation of an Environmental Impact Report and Initial Study. RSD partially addressed DTSC’s comments, but DTSC has not yet received the final report.
2. Section 9, Hazards Hazardous Materials of the SEIR states, “As documented in the FEIR, impacts related to hazards and hazardous materials related to the proposed Project covered by the FEIR would remain less than significant with implementation of mitigation measures HAZ-1, HAZ-2, and HAZ-3.” As of date, the implementation of mitigation measures is not completed.

3. If the Project requires import soil to backfill the areas excavated, DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).
4. DTSC recommends RSD to discuss the procedures that will be taken if the soil and/or groundwater contamination is suspected or discovered during grading, construction and/or demolition.

The SEIR states that the proposed Project would add approximately 11.3-acres to the south (a portion of APN 144-0-110-590) that RSD proposes to develop with new educational and support facilities, resulting in an approximately 41.5-acre Project Site. If this area is different than the May 25, 2022 executed EOA, DTSC has the following comments:

1. The SEIR should identify and determine whether current or historic uses at the Project Site may have resulted in any release of hazardous wastes/substances. Historic operations of the 11.3-acre Site are not mentioned in the SEIR and, a Phase I Environmental Site Assessment is necessary to identify any recognized environmental conditions. If state funding is anticipated, then DTSC review/approval is required pursuant to California Education Code. For school Projects that do not require state funding, DTSC recommends environmental review under the DTSC school program oversight to ensure the school is safe for students and staff.

2. Section 5.9, Hazards and Hazardous Materials of the SEIR states, “The modified Project would be required to comply with the applicable state and local requirements, including, but not limited to, the DTSC, CDE, FAR, Caltrans, County of Ventura Department of Airports (DOA), Ventura County, and the City of Oxnard, and would be required to implement, recommendations of the Site-specific PEA Equivalent Report, SSI Report, and associated DTSC approval letters, and existing mitigation can be applied to the SEIR phasing. For these reasons, the modified Project’s contribution to hazards and hazardous materials continues to be less than significant.” DTSC has not provided oversight for any environmental investigations at this 11.3-acre area of the Project.
3. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC’s Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).
4. Section 5.2, Agriculture and Forest Resources states, “The District-certified Project would convert important farmland in the southern campus expansion area to non-agricultural use.” If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides.
5. If there are any recognized environmental conditions in the Project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
6. If soil contamination is suspected or observed in the Project area, DTSC

recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).

Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

7. If during construction/demolition of the Project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the SEIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

DTSC appreciates the opportunity to comment on the SEIR for the RDVMS Existing Campus Expansion Master Plan. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

*Tamara Purvis*

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