



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

January 07, 2025

Dr. Marguerite Williams
Chief Business Officer
Santa Paula Unified School District
201 S. Steckel Road
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mwilliams@santapaulausd.org

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE ISBELL MIDDLE SCHOOL MODERNIZATION PROJECT DATED DECEMBER 18 2024, STATE CLEARINGHOUSE NUMBER [2023010299](#)

Dear Dr. Marguerite Williams

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the Isbell Middle School Modernization Project. Isbell Middle School currently serves approximately 700 students in grades 7-8. The school is located on a 14-acre site at 221 S. 4th Street in Santa Paula, with frontages on S. 4th Street and Harvard Boulevard. The district proposes to modernize Isbell Middle School to meet current educational needs and improve safety for students, staff and visitors while preserving the historic character of the school. The Project would involve replacing some existing buildings, including the main building, multi-purpose/cafeteria building, portable classrooms, and other structures, with new, safer, and more efficient buildings. The modernized campus would include a new administrative building, multi-purpose room (MPR), and seven new classroom buildings. The Project would also include parking and circulation improvements including expanding the parking lot along Harvard

Boulevard and establishing a student loading zone. The school's student capacity will increase from 700 to 750, with no planned increase in staff. After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), [§17210](#), [§17213.1](#), and [§17213.2](#), unless otherwise specifically exempted under section [§17268](#). If the district is not using CDE State funds for the project, or is otherwise specifically exempt under section [§17268](#), DTSC recommends the district continue to investigate, clean up the Site under the oversight of Ventura County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the [Office of Public-School Construction](#) webpage.

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. 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 the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

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DTSC appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Isbell Middle School Modernization Project. If you would like to proceed with DTSC's school environmental review process, please visit [DTSC's Evaluating & Clean-up School 3-Step Process to begin a Phase I Environmental Site Assessment.](#)

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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cc: (via email)

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