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Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
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SENT VIA ELECTRONIC MAIL

June 26, 2024

Brian Millar
Contract Planner
City of Dixon
600 East A Street
Dixon, CA 95620

bmillar@cityofdixon.us

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CAMPUS PROJECT,
DATED MAY 24, 2024, STATE CLEARINGHOUSE NUMBER [2023080739](#)

Dear Brian Millar,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for The Campus project (project). The project would consist of a phased, mixed-use, 259-acre development that includes an approximately 48-acre Dixon Opportunity Center (DOC), approximately 144 acres of residential uses, and approximately 2.5 acres of commercial uses. The DOC would be located at the north end of the site. A high-density residential site would be located contiguous to the DOC and adjacent residential uses. A service commercial site would be located in the southeast corner of the DOC and adjacent to the high-density residential site. The southern portion of the site would consist of medium density and low-density residential uses totaling 1,041 dwelling units.

DTSC recommends and requests consideration of the following comments:

1. Page V of the [Pedrick Road Property Phase I Environmental Site Assessment \(ESA\)](#) titled Former Mistler Farm Facility Area reads, “Considering the very limited occurrences of slightly elevated concentrations of diesel and lead in surface soils, these conditions would not appear to represent a significant environmental concern, particularly if the former farm facility area is not subject to future residential redevelopment.” Furthermore, the same section states, “The minor soil and groundwater impacts detected in the area of the former onsite Mistler Farm facility are considered *de minimis conditions*, provided that the former farm facility area is not subject to residential or other sensitive uses, and that drinking water wells are not installed in that area.” This statement also appears on Page 24 of the Phase I ESA under 10.0 Findings, Opinions, and Conclusions. Due to the proposed residential development, the project represents a significant environmental concern. DTSC recommends the City of Dixon utilize an approved oversight on the [Certified Local Agencies](#) list or enter into DTSC’s Standard Voluntary Agreement (SVA) program so a proper evaluation of the project is completed. If entering into an SVA with DTSC, the [FLUXX portal link](#) is provided and the page also has a link to the [Fluxx User Guide](#) that can help you navigate the system. You will need to create a new profile and once in the system, click “Start a Request for Lead Agency Oversight Application. If you have any questions about the application portal, please contact the DTSC Brownfield Coordinator [Gregory Shaffer](#) or contact the [Application Portal Inbox](#).”
2. Section 10.0 Findings, Opinions, and Conclusions also recognizes an abandoned landfill/open pit as a Recognized Environmental Condition (REC). It reads, “It is indicated an open pit was excavated within the far westerly portion of the former Mistler Farm facility on the subject property around the early 1970s, and that various wastes were disposed/landfilled in the pit. Testing of the waste materials indicates that most or all of the landfilled materials may be characterized as a California hazardous waste for disposal purposes. The results of testing native soils underlying the landfill and

groundwater beneath and near the landfill do not indicate significant impact conditions. VOCs were detected in soil gas samples collected from the area of the landfill; however, the data suggest that these conditions potentially could be mitigated via removal of the landfilled wastes and excluding future residential and other sensitive use from the affected area. Due to the identified contaminant conditions and the open regulatory agency status, the abandoned landfill at the subject site is considered a recognized environmental condition.” As suggested, the REC should be mitigated to ensure that the imported soil and fill material meets screening levels outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).

3. All imported soil and fill material should be tested to ensure any contaminants of concern are within DTSC's and U.S. Environmental Protection Agency Regional Screen Levels for the intended land use. 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 meets screening levels outlined in [PEA Guidance Manual](#) 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](#).
4. When agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are Dichlorodiphenyltrichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [Human Health Risk Assessment Note Number 3](#) approved thresholds outlined in the [PEA Guidance Manual](#). If they do not, remedial action must take place to mitigate them below those thresholds.

5. Additional chemicals of concern may be found in mixing/loading/storage area, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required.

DTSC appreciates the opportunity to comment on the DEIR for The Campus project. 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 any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

A handwritten signature in black ink that reads "Dave Kereazis". The signature is written in a cursive, flowing style.

Dave Kereazis
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Brian Millar
June 26, 2024
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cc: (via email)

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