



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
<https://dtsc.ca.gov/>



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

October 8, 2024

Kevin Coker
Senior Environmental Scientist / CEQA Practitioner
EBA Engineering
825 Sonoma Avenue, Suite C
Santa Rosa, CA 95404
kcoker@ebagroup.com

RE: FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE
SAMUEL L. JONES HALL HOMELESS SHELTER IMPROVEMENTS DATED
SEPTEMBER 25, 2024, STATE CLEARINGHOUSE NUMBER [2024040844](#)

Dear Kevin Coker,

The Department of Toxic Substances Control (DTSC) received the Final Initial Study/Mitigated Negative Declaration (IS/MND) for the Samuel L. Jones Hall Homeless Shelter Improvements project (project). The City of Santa Rosa is proposing to enhance the current Samuel L. Jones Hall Homeless shelter facility to better accommodate the recent increase in occupants and the quality of the community services provided and is not an evaluation of any impacts resulting from this previously approved permitted use that was determined to be CEQA exempt. The project includes exterior improvements such as ornamental landscaping features, aboveground community service facilities, additional asphalt parking and a new dedicated entrance driveway, pathways, curb and gutter improvements, pedestrian sidewalks and associated facilities, and modular shower and restroom facilities. Improvements would occur within the Sam Jones Hall

site, with some ancillary improvements occurring along Finley Avenue. After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. In Table 5.2, HAZ-3, Method of Verification column of the Final ISMND, it states: "Provide a copy of the Soil and Groundwater Management Plan (SGMP) to the Santa Rosa Fire Department (SRFD) for review and approval. Retain copy of the approved document on-site during construction". DTSC does not recommend that a SGMP, or a Soil Management Plan (SMP), be used as a primary cleanup plan to address contamination within the soil present at the site. DTSC recommends that any potential contamination be fully characterized and then remediated under the oversight of a [self-certified local agency](#) DTSC or Regional Water Quality Control Board (RWQCB). A SMP or SGMP alone cannot sufficiently identify and document the potential contaminants that may pose a threat to human health and the environment. DTSC recommends that a cleanup plan, a Removal Action Workplan (RAW) or Remedial Action Plan (RAP), be prepared to adequately address all site impacts after complete characterization. DTSC also recommends the City of Santa Rosa to coordinate with RWQCB to determine if the Groundwater portion of the recommended SGMP is sufficient to address the groundwater concerns.
2. DTSC recommends the City of Santa Rosa enter into a voluntary agreement to address contamination at brownfields and other types of properties or receive oversight from a [self-certified local agency](#), DTSC or Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have any questions about the application portal, please contact your [Regional Brownfield Coordinator](#).

3. 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](#).
4. 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](#)

DTSC appreciates the opportunity to comment on the Final Document for the Samuel L. Jones Hall Homeless Shelter Improvements 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 clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Kevin Coker
October 8, 2024
Page 4

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Planning and
Research State Clearinghouse
State.Clearinghouse@opr.ca.gov

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov