



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

July 10, 2024

Alana Cumpston
Superintendent / Principal
Reeds Creek Elementary School District
18335 Johnson Road
Red Bluff, CA 96080
acumpston@reeds creek.org

RE: MITIGATED NEGATIVE DECLARATION FOR THE REEDS CREEK
ELEMENTARY SCHOOL EXPANSION PROJECT, DATED JUNE 26 2024 STATE
CLEARINGHOUSE # [2024061146](#)

Dear Alana Cumpston,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Reeds Creek Elementary School Expansion Project (Project). The Project proposes to expand the existing Reeds Creek Elementary School with a transitional kindergarten program by adding 15.96 acres to the existing school site located at 18335 Johnson Road in Red Bluff. The existing school site would be expanded by constructing one new building that would house two new classrooms. A playground structure would be added in addition to a new parking area that would establish a student drop-off zone and improve street access to the site. Based on our review, DTSC 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 Orange 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. Based on the findings of the Phase I Environmental Site Assessment, it is Chico Environmental's opinion that further evaluation is required per CDE and DTSC requirements. Chico Environmental recommends Addendum Soil Sampling for arsenic in Subject Property soil, lead in soil from lead-based paint around the perimeter of the southernmost home and Organochlorine Pesticides from termiticides around the perimeter of both homes and soil sampling for polychlorinated Biphenyls at the base of each pole-mounted transformer.
3. DTSC recommends that 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 the [Preliminary Endangerment Assessment Guidance Manual](#) for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the

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

DTSC appreciates the opportunity to comment on the MND for the Reeds Creek Elementary School Expansion 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 any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

A handwritten signature in cursive script that reads "Tamara Purvis".

Tamara Purvis

Associate Environmental Planner

HWMP – Permitting Division - CEQA Unit

Department of Toxic Substances Control

Tamara.Purvis@dtsc.ca.gov

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cc: (via email)

Governor's Office of Planning and Research

State Clearinghouse

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Dave Kereazis

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