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June 29, 2020

City of Santa Barbara  
Attn: Ms. Jill Zachary  
PO Box 1990  
Santa Barbara, CA 93102-1990

Subject: 604 E. Ortega Street, Santa Barbara, California; Ortega Park  
**SMU# 760, Global ID# T10000014371, APN# 031-172-002**

Dear Ms. Zachary:

The Santa Barbara County Public Health Department, Environmental Health Services Division (EHS), Site Mitigation Unit (SMU) has reviewed the *Corrective Action Plan/Site Mitigation Plan (CAP/SMP)*, dated June 10, 2020, for the subject site. EHS has the following comments for this site:

1. The *CAP/SMP* notes that a large portion of the 5.35 acre site, will be extensively modified to revitalize the existing Ortega Park. The planned major renovations will include, replacing and relocating the pool, installing a wading pool, installing a splash pad, building a skate park, replacing the existing grass field with an artificial turf field, and replacing the bathroom/pool facilities building. Several of these facilities will require excavating to depths up to 11.5 feet below ground surface (bgs). Most of the assessment soil borings performed to date have extended to a maximum depth of 4 feet bgs with only three going to 10 feet bgs. Therefore the vertical extent of contaminated soils that may be encountered during the renovation activities is largely unknown.
2. The *CAP/SMP* notes soil contamination including the following:
  - a. Total Petroleum Hydrocarbons (TPH) in the diesel and motor oil ranges (RB3, RB4, RB5, RB6, RB7, RB9, RB10, RB11, and RB12).
  - b. Metals: arsenic, barium chromium, lead, mercury, thallium and zinc (RB5, RB6, RB7, RB9, RB10, RB11, HP3, HP4, and HP5).
  - c. Polycyclic Aromatic Hydrocarbons (PAHs) - Benzo(a)pyrene equivalents (RB3, RB5, RB6, RB7, and RB8).
3. The *CAP/SMP* notes groundwater contamination including the following:
  - a. Total Petroleum Hydrocarbons (TPH) in the diesel and motor oil ranges.
  - b. Volatile Organic Compounds (VOCs): one sample result for benzene was equal to the MCL.

4. The CAP/SMP proposes to conduct excavation activities and perform soil verification sampling of both the bottom and sidewalls of the excavations, to ensure that the final excavation depths reached provide the respective required spatial separation of impacted soils from the features being installed during the park renovation activities. A phased renovation approach may make handling the impacted soils more difficult. Verification sampling shall be conducted at the following rates and shall serve to supplement the existing assessment data:
  - a. Bottom samples at one sample collected and analyzed per every 100 square feet of bottom.
  - b. Sidewalls at the rate of one sample for every 150 square feet.
  - c. It is EHS' understanding that geotechnical borings shall be advanced prior to construction of select features. Samples shall be collected and analyzed from these borings to verify the depth of contaminants to inform future projects and provide data for a Land Use Covenant.
  
5. As the planned renovation activities will encounter hazardous materials, multiple work agencies will likely have restrictions on how and when work will be allowed to proceed. The agencies most likely with restrictions include but are not limited to:
  - a. SBCo-EHS - requires all excavated impacted soils, above cleanup goals (appropriate ESLs), to be properly disposed of offsite and not used for fill onsite or anywhere else. Any fill necessary shall be clean imported fill tested in accordance with the October 2001 document titled *DTSC Information Advisory Clean Imported Fill*.
    - i. EHS has concerns about the proposed locations and function of the Cultec storm water chambers, which act as a water detention and infiltration system. The proposed location appears to be over areas of contaminated soils and historic fill at the closed landfill, leading to concerns regarding leaching those contaminants into groundwater. EHS requires this issue to be resolved prior to the start of field work.
    - ii. The City of Santa Barbara's own storm water management requirements shall be reviewed prior to making the final design changes.
  - b. The Central Coast–Regional Water Quality Control Board may have additional requirements for lead impacted soils being located near stormwater infiltration devices which also discharge to stormwater drains.
  - c. The Santa Barbara APCD - may restrict when work can occur, such as when school is out of session, and will likely require various dust control methods.

After a careful review of the CAP/SMP, EHS has the following directives:

- 1) EHS conditionally approves the general concept and approach noted in the CAP/SMP.
- 2) Verification samples shall be determined based upon the findings during the field work, but you shall prepare to collect samples at the rate of: bottom samples at one per 100 square feet and sidewall samples at the rate of one per 150 square feet.
- 3) Any impacted soils or materials left-in-place which exceed the SF-RWQCB Environmental Screening Levels (ESLs) for residential scenarios, shall require a Land Use Covenant, to be recorded to the deed.
- 4) Please ensure that your design follows and incorporates the requirements noted in the California Code of Regulations Title 27, Section 21190.

- 5) Submit to EHS a schedule for implementation, 60-days after receiving approval from Community Development. Notify EHS both 30-days and again, one-week prior to the start of field work. EHS requires a 30-day public comment period for the proposed Corrective Action Plan. Based upon the scope of the project, a newspaper advertisement and mailed notices to residents and fee title owners within 500 feet of the site are appropriate. Submit a draft newspaper ad and fact sheet to EHS for approval by July 30, 2020.
  - i) As required by State and County requirements under the California Environmental Quality Act (CEQA), EHS will issue a Notice of Exemption (NOE) for the *CAP/SMP*. EHS will post the NOE on GeoTracker and the public will have 180-days to file a legal challenge to this NOE (not just present a public comment). Corrective action may commence prior to conclusion of the 180-day statute of limitations period on legal challenges.
  - ii) You may file, a wet signature copy of the NOEs with the Clerk of the Board of Supervisors, for a filing fee of \$50. Filing an NOE with the Clerk of the Board, reduces the legal challenge period from 180-days to 35-days. Please let me know if you wish to pursue this option.
  - iii) If the City has already completed their own CEQA determination for this project, that includes the excavation and off-site disposal of impacted soil and/or groundwater, EHS shall not duplicate the efforts. Please provide EHS a copy of the documentation if this is the case.
- 6) It is your responsibility to obtain all permits and appropriate clearances prior to beginning fieldwork. All required permits shall be in hand prior to initiating fieldwork.
- 7) This approval is valid for **one (1) year** from the date of this letter, upon which EHS reserves the right to review and reassess this proposal.

If you have any other questions regarding the aforementioned, please contact me at (805) 346-8344, or via email at [steve.nailor@sbcphd.org](mailto:steve.nailor@sbcphd.org). Written correspondence regarding this matter should be sent to EHS at Attn: Steven Nailor 2125 S. Centerpointe Parkway, Suite 333, Santa Maria, CA 93455.

Respectfully yours,



E. Steven Nailor, REHS, EIT  
Senior Hazardous Materials Specialist  
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