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Lars Seifert, Director of Environmental Health

November 12, 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 letter of comments (*Letter*), dated November 8, 2020, submitted by Heal the Ocean's Ms. Hillary Hauser to the City of Santa Barbara Planning Commission. The *Letter* raises concerns regarding the proposed Draft Mitigated Negative Declaration for the Ortega Park Master Plan. EHS has the following comments on the specific issues regarding the remediation at the subject site:

1. Page 1 paragraph #3 – *"As with other development projects that have come before the City Planning Commission, Heal the Ocean once again insists that the 5.35-acre Ortega Park, which overlies a former city dump, be cleaned up/remediated before one shovel of dirt is moved."*
 - a. Responsible Parties and consultants evaluate and select what they determine to be the most cost effective way of meeting "cleanup goals." EHS approves/disapproves a remedial approach mostly based upon proven effectiveness for the contaminants of concern, but with some consideration for both cost effectiveness and time to completion.
 - b. Due to the heterogeneous nature of historic imported fill, the extent of contamination at the site will not be truly known until excavation occurs. Thus, management of the soil produced during the park improvement project is paramount. Excavation and disposal is generally considered one of the best remedial approaches for remediation of metals and Polycyclic Aromatic Hydrocarbons (PAHs) in soil. EHS requires adequate testing and confirmation sampling and analytical as noted in Comment #4 of EHS' letter dated 6/29/2020.
2. Item I. ISSUE: Contaminated Soils – page 2, paragraph 2, *"Phase approach" means "test as you go along" (Heal the Ocean's term), it comes from Mr. Nailor's letter to the City dated May 26, 2020."*

- a. The “phases” to which EHS was referring to addressing different portions of the park at different times, including separated intervals, as monies become available. The City staff have identified the following general phases of work on this project:
 - i. Phase 1 (4-months) – street right-of-ways, parking, sidewalks, storm drain areas,
 - ii. Phase 2 (8-months) – demolish existing structures, all remediation excavation, general grading, field development,
 - iii. Phase 3 (14-months) – construction pool facility, all buildings, skate park and courts, and other new park features.
 - b. Based upon the contamination found, excavation and disposal is likely the most cost effective approach to properly handle and dispose of excavated impacted soils and to provide a safe separation distance from soils impacted with non-volatile contaminants.
 - c. As noted in EHS’s June 29, 2020 letter, multiple agencies are involved in the overall approval process. Ensure that all permits and clearances from other agencies are in hand prior to field work.
 - d. The *SMP* notes that it will use a licensed general contractor, with HazMat endorsements, and properly trained staff employees.
3. Item II. ISSUE: Groundwater, found on pages 5-6, refers to groundwater impacts, which EHS noted as being mainly impacted by TPHd & TPHmo ranges and one sample result for benzene at the MCL (Maximum Contaminant Level for drinking water).
 - a. All localized dewatering is required at this site for the deeper excavations, and or construction activities, it will be containerized and tested prior to proper treatment and/or disposal.
 - b. Dewatering may also be required at the swimming pool and skate park, both of which will be built by sub-contractors specializing in these fields.
4. Item III: ISSUE: Stormwater – the authority for regulating stormwater is under the oversight of the Central Coast Regional Water Quality Control Board (CC-RWQCB), as was noted in EHS’ letter, dated June 29, 2020.
 - a. EHS noted potential concerns regarding the placement of the proposed stormwater infiltration devices near impacted soils.
 - b. This issue needs to be resolved with the CC-RWQCB.
5. Item IV: ISSUE: Artificial Turf – EHS does not have regulatory authority over this issue. .
 - a. EHS recommends the City of Santa Barbara review the information on artificial turf at the state of California’s Office of Environmental Health Hazard Assessment (OEHHA), <https://oehha.ca.gov/risk-assessment/synthetic-turf-studies>.
6. Item V: ISSUE: Learning from the Desalination Plant Project – Unanticipated contaminants that may be encountered by construction workers will increase costs to the City.

- a. EHS provided oversight for the remediation project at the Desalination Plant and the general concept is similar, however these projects are different.
- b. Excavation at the Ortega Park project should be easier because nearly the whole park area will be demolish to allow access for excavation.
- c. The point raised appears to be regarding the estimation of costs for removal and disposal of soils impacted by lead (Pb) as this is a known contaminant of concern. It is up to the Responsible Party to ensure they are comfortable with the proposed path forward and associated cost implications.

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

Respectfully yours,



E. Steven Nailor, REHS, EIT
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