February 25, 2004

Mr. Peter Goldstein
City College of San Francisco
33 Gough Street
San Francisco, California 94103

DRAFT ENVIRONMENTAL IMPACT REPORT FOR CITY COLLEGE OF SAN FRANCISCO, CITY COLLEGE OF SAN FRANCISCO MASTER PLAN, PHELAN AVENUE, OCEAN AVENUE, JUDSON AVENUE, AND HAVELock STREET, SAN FRANCISCO, SAN FRANCISCO COUNTY, CALIFORNIA (SCH 2003102086)

Dear Mr. Goldstein:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Environmental Impact Report (DEIR), dated January 30, 2004, for the subject project.

Based on a review of the DEIR, DTSC is providing the following comments:

1. Due to construction date of the on-site historic structures, it is likely that they contain lead-based paint. DTSC recommends that the environmental conditions be investigated and possibly mitigated, in accordance with DTSC’s “Interim Guidance for Evaluating Lead-Based Paint and Asbestos-Containing Materials At Proposed School Sites, dated July 2001.”

2. A site may have a regulatory closure under a specific agency standard (e.g., for industrial land use); however, a closed underground storage tank (UST) may still present risk to students and DTSC oversight may be needed. In addition, there is one active UST on the campus. Therefore, the areas where the leaking UST was located and the current UST is located should be evaluated for school use. A soil gas survey should be conducted in accordance with DTSC’s “Advisory - Active Soil Gas Investigations, dated January 2003.”

3. Historical herbicide and pesticide use has been identified, such as DDT, DDD, DDE and heavy metals may be present. These chemicals are persistent and bioaccumulative toxic substances. DTSC has developed the “Interim Guidance for Sampling Agricultural Soils (Second Revision), dated August 2002.” This Guidance may be followed for sampling the areas where pesticide use has been identified.
Mr. Peter Goldstein  
February 25, 2004  
Page 2

4. A Phase I Environmental Site Assessment (Phase I) was conducted by Treadwell & Rollo, but was not included in DEIR. DTSC has no opportunity to review the Phase I. The ASTM Phase I guidance is an industry standard for due diligent evaluation for commercial real estate transaction. Since the project is school site related, DTSC recommends that “Phase I Environmental Site Assessment Advisory: School Property Evaluations, dated September 2001” be followed in finalization of the Phase I for the project.

5. While it is school site related, the project does not appear to have been reviewed by DTSC under the School Property Evaluation and Cleanup Program authorized by AB 387, SB162, AB 2644 and AB 972. The City College of San Francisco (CCSF) is invited to participate in DTSC’s School Property Evaluation and Cleanup Program. If CCSF elects to proceed to conduct a PEA at the site, it shall enter into an Environmental Oversight Agreement (EOA) with DTSC to oversee the preparation of the PEA.

DTSC is also administering the $85 million Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

For additional information on the EOA or CLEAN Program, please visit DTSC’s web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (818) 551-2860.

Sincerely,

Ken Chiang  
Senior Hazardous Substances Scientist  
School Property Evaluation and Cleanup Division

cc: see next page
Mr. Peter Goldstein  
February 25, 2004  
Page 3

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