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Secretary for
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Department of Toxic Substances Control

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SENT VIA ELECTRONIC MAIL

September 4, 2024

Julie Newton
Environmental Coordinator
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RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WEST JACKSON
HIGHWAY MASTER PLAN DATED JULY 25, 2024, STATE CLEARINGHOUSE
NUMBER [2013092021](#)

Dear Julie Newton,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the West Jackson Highway Master Plan (Project). The proposed Project will create two District Plan Areas (District 1 and District 2) (approximately 5,913 acres) and three Future Planning Areas (FPA). The Project will require amendments to the Sacramento County General Plan and the Cordova and Vineyard Community Plans. The Project includes a rezone to Special Planning Area for District 1 and District 2. Within Districts 1 and 2, the Project includes a range of land uses: very low density residential (1-4 units/acre), low density residential (3-8 units/acre), medium density residential (7-18 units/acre), high density residential (20-30 units/acre), mixed use (20-30 units/acre), commercial, employment, industrial, parks/open space, schools (three elementary schools and one middle/high school),

institutional and major roadways. The proposed Project will include future Specific Plans which may include rezoning and future developments.

As stated in the DEIR, the proposed project has development plans immediately south of the former [Mather Air Force Base \(AFB\)](#) which is listed on the Superfund National Priorities List (NPL) site. DTSC recommends that the following comments be addressed in the Final EIR:

1. Groundwater - Chlorinated solvents and Per- and Polyfluoroalkyl Substances (PFAS) contaminant plumes from the former Mather AFB impact groundwater within project plan area. Any new private or public drinking water well application would be subject to Sacramento County ordinance regarding groundwater consultation zone and would require both Local and State agency approval. Please review the [Annual and Fourth Quarter 2021 Groundwater Monitoring Report](#) and enclosed PFAS figure for specific information regarding contaminant plumes and groundwater remedial systems (monitoring wells, extraction wells and piping system) south of the former Mather AFB. The Air Force and Regulatory Agencies (Environmental Protection Agency, DTSC and Central Valley Water Board) would require the protection of the groundwater remedial system during property development.
2. Site 7 Groundwater Plume - The chlorinated solvent groundwater plume is fairly shallow. Evaluation of shallow soil gas and potential vapor intrusion mitigation is warranted prior to building construction for commercial/industrial and residential use. Please review the above report regarding the Site 7 groundwater plume.
3. Waste Pit 07 (WP-07, also known as the Site 7 landfill) - The WP-07 description and location (along the southern former Mather AFB boundary) is in the [Mather 2022 Fourth Quarter and Annual Landfill Inspection and Gas Monitoring Report](#). The WP-07 Land Use Controls (LUCs) or Institutional Controls (ICs) associated with properties on the former Mather AFB (owned by Sacramento County) are in the [Revised Final ESD from Soil Operable Unit \(OU\) and Groundwater OU Plume ROD](#) and state the following:

“Controls to minimize potential for completing the inhalation exposure pathway for methane and other gasses potentially migrating from the landfill sites, require future landowners to obtain approval for any changes in land use or site improvements within 1,000 feet of a landfill from the State, until and unless it is demonstrated that the landfill is no longer a threat to human health and the environment. This requirement is based on regulations at 27 California Code of Regulations (CCR) § 21190 that apply to landfill properties.”

4. The Air Force and Regulatory Agencies should be consulted regarding establishment of an appropriate buffer zone based upon WP-07 (and/or item 2) soil gas data and land use to limit construction in the vicinity of the landfill site south of the Mather AFB boundary, if warranted.
5. The PFAS remedial investigation has not started and will not be completed until late 2025. Please refer to the [Mather Fifth Five Year Review Report \(Cape 2020\)](#) for additional references.
6. 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](#).
7. 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 PEA Guidance Manual](#).

8. When agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [HHRA NOTE NUMBER 3, DTSC-SLs](#) approved thresholds. If they are not, remedial action must take place to mitigate them below those thresholds.
9. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required.

DTSC believes Sacramento County must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA.

Please refer to the [Sacramento County EnviroStor Map](#) for additional information about the areas of potential contamination. If further concerns or impacts surface in light of any forthcoming environmental documents or any future Projects within the proposed Project area, DTSC reserves the right to provide applicable comments at that time.

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DTSC appreciates the opportunity to comment on the DEIR for the West Jackson Highway Master Plan. 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.

Sincerely,

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

Tamara Purvis
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cc: (via email)

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