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**Terracon.com**

May 9, 2025

Department of Toxic Substances Control  
Site Mitigation and Restoration Program  
8800 Cal Center Drive  
Sacramento, California 95826

On behalf of:  
Alameda Unified School District  
2060 Challenger Drive  
Alameda, California 94501

**Attn:** Ms. Lisa Holcomb  
P: 916-255-6523  
E: [lisa.holcomb@dtsc.ca.gov](mailto:lisa.holcomb@dtsc.ca.gov)

**Re:** Letter of Intent  
Wood Middle School  
420 Grand Street  
Alameda, Alameda County, California 94501  
EnviroStor Case No. 60003799  
Terracon Project No. NB257123

Dear Ms. Holcomb:

On behalf of the Alameda Unified School District (AUSD), Terracon has prepared this Letter of Intent for the Wood Middle School located at 420 Grand Street in Alameda, California, further referred to as the "Site". This Letter of Intent has been prepared in response to recent environmental characterization activities supporting reconstruction of the Site. This letter summarizes information discussed in the meeting held between the Department of Toxic Substances Control (DTSC), the AUSD, and Terracon on May 7, 2025, and outlines proposed next steps for the project.

The Site consists of an approximately 5.4-acre portion of Alameda County Assessor Parcel Numbers (APNs) 17-1250-1-5. Based on the site history provided in ACC Environmental Consultants' (ACC) *Phase I Environmental Site Assessment* (ACC Project No. 3007-171-00, dated March 5, 2024), the Site and adjoining properties consisted of a portion of the San Francisco Bay from as early as 1895 and were part of the South Shore Reclamation Project in the 1950s, which included the import of fill material for the Site and surrounding areas. The Site and adjoining properties were developed with the existing school property, residential neighborhoods, and open spaces in the 1960s and remained relatively



unchanged through the present. As of November 2024, the Site has been undergoing redevelopment with a new middle school campus.

Based on the findings of ACC’s Phase I ESA, the following areas of concern (AOCs) and associated contaminants of potential concern (COPCs) were identified:

| Area of Concern (AOC)                           | Chemical of Potential Concern (COPC)                                       |
|---|--|
| Pad-Mounted Transformer                         | PCBs   |
| School Structures (Construction Dates: 1965)    | Lead Based Paint (Lead)  |
| Former Structures (1958 – 1963 and 1974)        | Lead Based Paint (Lead)  |
| South Shore Reclamation Project (Fill Material) | TPH, VOCs, SVOCs, OCPs, PCBs, CAM 17 Metals, Asbestos, Hexavalent Chromium |

In conjunction with DTSC approval and oversight, ACC has completed four soil sampling events at the Site to evaluate the above-listed COPCs. Analytical results have been compared to the DTSC’s Human Health Risk Assessment (HHRA) Note 3 Screening Levels (DTSC-SLs), published June 2020, revised May 2022, for residential land use and commercial/industrial land use exposure scenarios.

Based on the sampling and analytical data collected by ACC, the following conclusions have been made regarding each AOC:

- **Pad-Mounted Transformer**: Soil samples collected in the vicinity of the pad-mounted transformer were not reported with polychlorinated biphenyls (PCBs) at concentrations above laboratory reporting limits. **No further investigation was recommended for this AOC.**
- **School Structures (Construction Dates: 1965)**: Soil samples collected in the vicinity of the former structure were not reported with concentrations of lead above the DTSC Screening Level (DTSC-SL) for residential land use of 80 milligrams per kilogram (mg/kg). **No further investigation was recommended for this AOC.**
- **Former Structures (1958-1963 and 1974)**: One sample location, ACCB18, was reported with lead concentrations at 200 mg/kg, which exceeds the residential land use DTSC-SL of 80 mg/kg. ACC conducted step-out sampling around ACCB18 and concluded that the lead impacts did not extend beyond and approximately 10x10 square foot (SF) area and a depth of approximately 1-foot below grade surface (bgs). ACC prepared the *Technical Memorandum for Addressing Lead-Impacted Soil* (“Technical Memorandum”, ACC Project No. 3007-171.02), dated November 18, 2024, which outlined provisions for the excavation of lead-impacted soils in the vicinity of ACCB18, confirmation sampling, and off-hauling procedures. The Technical Memorandum was revised on March 3, 2025 to incorporate DTSC comments provided

on March 2, 2025. The DTSC approved the revised Technical Memorandum on February 14, 2025. **Lead impacted soils identified within this AOC are planned for excavation in accordance with the approved Technical Memorandum document.**

- **South Shore Reclamation Project (Fill Material):** The portion of Alameda occupied by Wood Middle School and the surrounding residential properties is comprised of engineered fill used to expand the land usable for urban development, referred to as the South Shore Reclamation Project. These land reclamation activities were conducted in the 1950s, with the fill material being comprised of dredge spoils from the San Francisco Bay and excavated material from nearby projects. Reclamation activities were closely followed by the development of the Site as a school, with the areas surrounding the Site being developed as single and multi-family residential properties. The Site has no history of historical industrial or commercial land use; however, the fill material has been known to contain elevated concentrations of heavy metals and petroleum hydrocarbons.

Based on the historical review of the Site and boring logs prepared by ACC, the fill material present at the Site appears to consist of a homogeneous light-gray to brown poorly-graded sand.

Soil samples collected throughout the Site were reported with concentrations of total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), California Administrative Manual (CAM) 17 metals, organochlorine pesticides (OCPs), PCBs, and asbestos at concentrations below respective DTSC-SLs for residential land use and/or below laboratory reporting limits.

At the direction of the DTSC, soil samples were additionally analyzed for hexavalent chromium. A summary of ACC's subsurface investigation for hexavalent chromium will be submitted to the DTSC under separate cover. **Recommendations for this hexavalent chromium are discussed further below.**

#### Construction Schedule, Phased Work, and Defining Operable Unit Boundaries

The initial assessment of the Wood Middle School project included the eastern adjoining Donald D. Lum Elementary School and athletic fields. The elementary school buildings were demolished in 2023, after which portable classrooms were placed and temporarily occupied by the Wood Middle School operations. The campus has been utilizing the area temporarily while the new on-site middle school campus is being constructed. Redevelopment of the eastern adjoining temporary campus is proposed at a later date.

The on-Site construction schedule includes the development of a roadway with entrances to the Site from Otis Drive to the north and Grand Street to the east. The proposed roadway



will provide access for student drop-off and act as a fire access road to the Site. Currently, a portion of the proposed roadway is utilized by the eastern adjoining temporary campus for access to the existing multi-purpose building for school lunches and other activities. Therefore, the proposed roadway can only be constructed during the Summer holiday between June 5, 2025, and August 11, 2025. The proposed roadway is scheduled for construction starting June 9, 2025, and will be completed by August 8, 2025. **The development of the roadway is considered a critical juncture for the construction schedule and safety feature for students and staff starting the 2025-2026 school year.**

Based on the above, Terracon proposes the following Operable Units be assigned to the Site and adjoining property:

| Operable Unit No. | OU Name                  | Description  | Screening Level Designation | Construction Schedule          |
|-------------------|--------------------------|--|-----------------------------|--------------------------------|
| OU1               | Roadway                  | An approximate 1.2-acre portion of APNs 17-1250-1-5. An easement agreement has been obtained between the City of Alameda and AUSD for the development of the roadway. The roadway will consist of a two-lane asphalt-paved road with concrete-paved sidewalks, light poles, and the northern half of the road will include parking and landscape features on either side of the roadway. | Commercial / Industrial     | June 9, 2025 to August 8, 2025 |
| OU2               | School Campus – Phase I  | An approximate 4.2-acre portion of APNs 17-1250-1-5. OU2 encompasses the new Wood Middle School campus, including three new school buildings, asphalt-paved playground and parking lot areas, and concrete-paved and landscaped courtyard areas, which are currently under construction.   | Residential                 | November 2024 to April 2026    |
| OU3               | School Campus – Phase II | An approximate 8.8-acre portion of APN 74-1250-1-5. OU3 consists of the temporary school campus and athletic fields. The temporary school campus is proposed for use by another AUSD school once the OU2 construction is completed. It is not known at this time when redevelopment of this OU will occur.   | Residential                 | To be determined               |

South Shore Reclamation Project (Fill Material) and Hexavalent Chromium Analytical Results

The following provides a summary of hexavalent chromium concentrations reported for soil samples collected by ACC and analyzed by McCampbell Laboratories of Pittsburg, California:



### Summary of Hexavalent Chromium Analytical Results

| Boring ID                       | Location                     | Sample ID             | Chromium VI (mg/kg) |
|---------------------------------|------------------------------|-----------------------|---------------------|
| ACCB25                          | OU1 - Roadway                | ACCB25-0.5            | <b>0.62</b>         |
|                                 |                              | ACCB25-4.0            | <0.24               |
| ACCB26                          |                              | ACCB26-0.5            | <b>0.23</b>         |
|                                 |                              | ACCB26-4.0            | <b>0.34</b>         |
| ACCB10                          | OU2 - School Campus Phase I  | ACCB10-0.5            | <b>0.23</b>         |
| ACCB11                          |                              | ACCB10-4.0            | <0.24               |
|                                 |                              | ACCB11-0.5            | <0.24               |
| ACCB12                          |                              | ACCB11-4.0            | <0.22               |
|                                 |                              | ACCB12-0.5            | <0.22               |
| ACCB13                          |                              | ACCB12-4.0            | <0.21               |
|                                 |                              | ACCB13-0.5            | <b>0.15 J</b>       |
| ACCB27                          |                              | ACCB13-4.0            | <0.21               |
|                                 |                              | ACCB27-0.5            | <b>0.46</b>         |
| ACCB30                          |                              | ACCB27-4.0            | <0.22               |
|                                 | ACCB30-0.5                   | <0.22                 |                     |
| ACCB28                          | OU3 - School Campus Phase II | ACCB30-4.0            | <0.22               |
|                                 |                              | ACCB28-0.5            | <b>0.34</b>         |
| ACCB29                          |                              | ACCB28-4.0            | <0.23               |
|                                 |                              | ACCB29-0.5            | <b>0.90</b>         |
|                                 |                              | ACCB29-4.0            | <0.22               |
|                                 |                              | Residential           | <b>0.3</b>          |
| <b>DTSC-SL</b>                  |                              | Commercial/Industrial | <b>6.2</b>          |
| <b>SFBRWQCB ESL<sup>2</sup></b> |                              | Construction Worker   | <b>2.8</b>          |

Notes:

1. J-Flag: the reported concentration is flagged by the laboratory as an estimated value.
2. San Francisco Bay Regional Water Quality Control Board Environmental Screening Level (SFBRWQCB ESL) for direct exposure human health risk level for construction worker exposure, published January 2019, rev 2.

### *OU1 - Roadway*

Hexavalent chromium concentrations reported in soil samples collected from the proposed Roadway (OU1) are below the commercial/industrial DTSC-SL of 6.2 mg/kg. Additionally, the reported Roadway sample concentrations are below the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) established environmental screening level (ESL) direct exposure human health risk levels for construction worker exposure of 2.8 mg/kg.

**Based on the proposed future land use of the Roadway, Terracon does not recommend further investigation of hexavalent chromium within the proposed Roadway.**

To support construction of the roadway, the following documents will be developed and utilized for the duration of construction:

- Soil Management Plan (SMP);
- Health and Safety Plan (HASP); and,
- Community Air Monitoring Program (CAMP)

**Terracon anticipates these documents will be provided to the DTSC on or before May 23, 2025.**

### *OU2 – School Campus – Phase I*

Based on the May 7, 2025 meeting with the DTSC and AUSD, hexavalent chromium will require further characterization within the OU2 boundary. At the issuance of this Letter of Intent, Terracon is preparing an addendum to the DTSC-approved *Soil Investigation Work Plan* (ACC Project No. 3007-171.03, dated January 29, 2025). The addendum will include a summary of proposed supplemental sampling locations, sampling depths, and the proposed schedule.

### *OU3 – School Campus – Phase II*

Based on the May 7, 2025, meeting with the DTSC and AUSD, hexavalent chromium will require further characterization within the OU3 boundary. At the issuance of this Letter of Intent, Terracon is preparing an addendum to the DTSC-approved *Soil Investigation Work Plan* (ACC Project No. 3007-171.03, dated January 29, 2025). The addendum will include a summary of proposed additional sampling locations, sampling depths, and the proposed schedule.

### **Summary**

Based on the historical and laboratory analytical information reviewed, two AOCs have been confirmed with contaminants present above residential DTSC-SLs:

- Former Structures (1958-1963 and 1974) – Lead
- South Shore Reclamation Project (Fill Material) – Hexavalent Chromium



A Technical Memorandum has been prepared and approved by the DTSC to excavate lead-impacted soils in the vicinity of boring ACCB18, located in the vicinity of the Former Structures (1958-1963 and 1974).

The fill material appears to be a community-wide condition present at the Site and surrounding areas relating to the South Shore Reclamation Project. Based on the proposed future land use scenarios and construction schedule, Terracon proposes defining three Operable Units:

| Operable Unit No. | OU Name                  | Screening Level Designation |
|-------------------|--------------------------|-----------------------------|
| OU1               | Roadway                  | Commercial / Industrial     |
| OU2               | School Campus – Phase I  | Residential                 |
| OU3               | School Campus – Phase II | Residential                 |

Based on the proposed land use for the Roadway, Terracon recommends no additional characterization of hexavalent chromium in OU1. To support the roadway's construction, an SMP, HASP, and CAMP will be prepared and implemented during the Roadway's construction.

The lateral and vertical extents of Hexavalent chromium will be further delineated within OU2 and OU3. Addendums to the DTSC-approved *Soil Investigation Work Plan* (ACC Project No. 3007-171.03, dated January 29, 2025) will be prepared that include a summary of proposed additional sampling locations, sampling depths, and proposed schedule. The *Soil Investigation Work Plan Addendums* will be presented under separate cover.

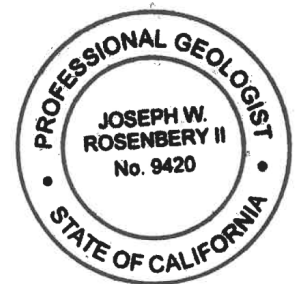
Terracon Consultants, Inc. (Terracon) appreciates the opportunity to submit this *Letter of Intent* to the DTSC on behalf of the AUSD. Please contact the undersigned at 916-246-5080 if you have questions regarding the information provided in this letter.

Sincerely,

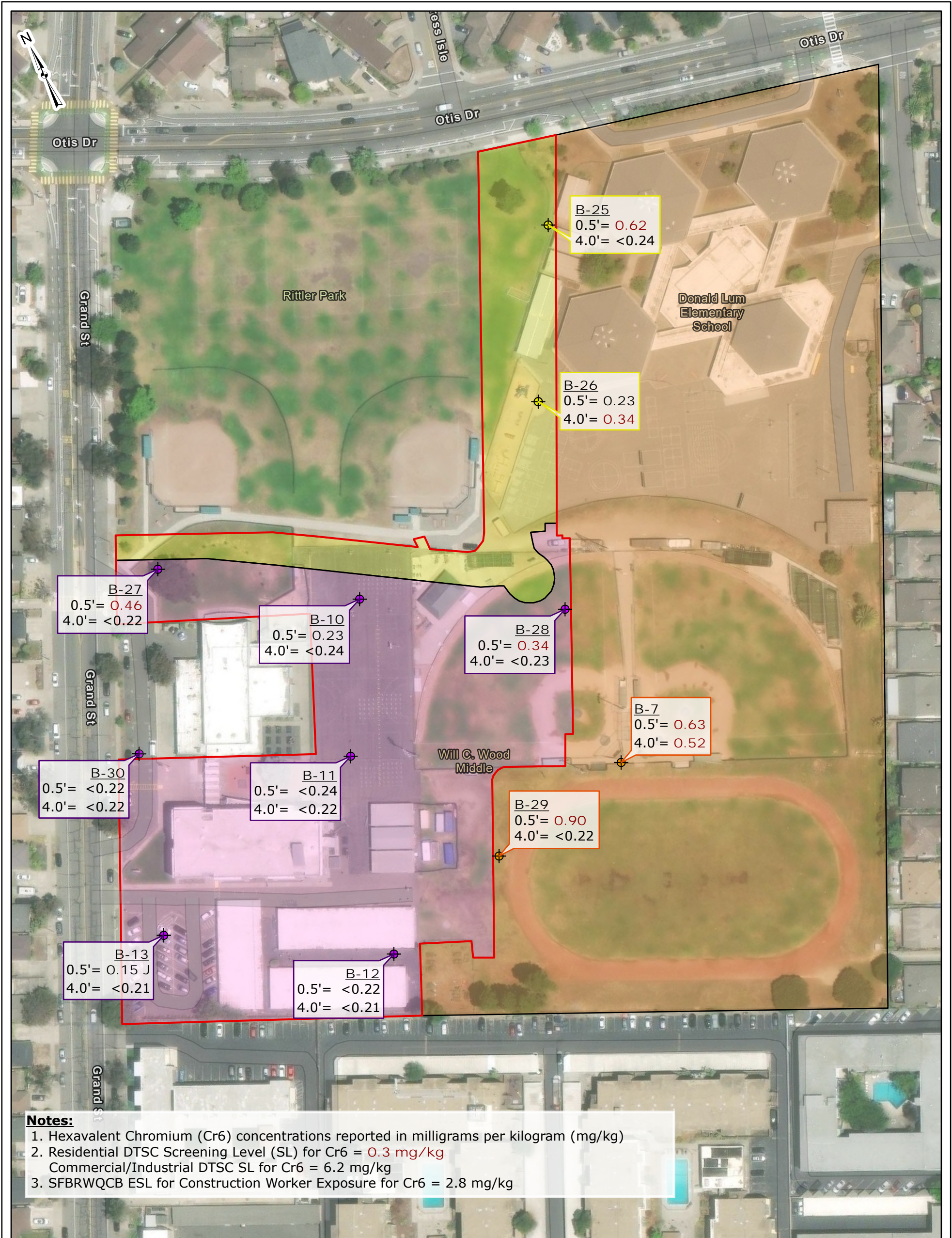
**Terracon Consultants, Inc.**

Sadie Bodiford  
Project Manager

Joe Rosenbery, P.G. 9420  
Department Manager II

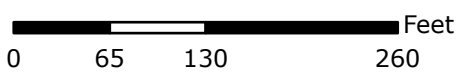


Attachments: Exhibit 1 – Site Diagram



**Notes:**

1. Hexavalent Chromium (Cr6) concentrations reported in milligrams per kilogram (mg/kg)
2. Residential DTSC Screening Level (SL) for Cr6 = 0.3 mg/kg  
Commercial/Industrial DTSC SL for Cr6 = 6.2 mg/kg
3. SFBRWQCB ESL for Construction Worker Exposure for Cr6 = 2.8 mg/kg



Area Under Construction (Nov 2024 - Present)

ACC Environmental Consultants (March 2025)

Operable Unit (OU)

- OU1 - Roadway
- OU2 - School Campus Phase I
- OU3 - School Campus Phase II

- ACC Boring Location in OU1
- ACC Boring Location in OU2
- ACC Boring Location in OU3



Project No.: NB257123  
Date: 05/07/2025  
Drawn By: SMB  
Reviewed By: JR

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**Site Diagram**

Wood Middle School  
420 Grand Street  
Alameda, Alameda County, California

**Exhibit**

**1**