



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
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Gavin Newsom
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SENT VIA ELECTRONIC MAIL

August 13, 2024

Michelle Levenson

Principal Planner

Marin County Community Development Agency

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RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE NORTH COAST LAND HOLDINGS MASTER PLAN AND COMMUNITY PLAN AMENDMENT PROJECT, DATED JULY 17 2024 STATE CLEARINGHOUSE NUMBER [2020090488](#)

Dear Michelle Levenson,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the North Coast Land Holdings Master Plan and Community Plan Amendment Project (Project). The proposed Project includes construction of a new residential care facility with up to 100 independent and 50 assisted living and memory care apartments for senior citizens and 336 single- and multi-family residential units that would replace a majority of the existing residential housing. Fifty of the proposed residential units would be reserved as below market rate housing. In addition, a preschool (3,000 square feet) and fitness center (17,000 square feet) that would both be open to the public are proposed, and an existing maintenance building would be replaced. More than 70 percent of the 127-acre campus would be preserved as open space, athletic fields, paths and plazas. No change to the scope of the existing use permit allowing up to a maximum of 1,000 students for higher educational use is being

proposed. A 15,800-square-foot addition is proposed as part of the renovation of the Administration Building, resulting in a 41,000 square foot building. After review of the NOP of a DEIR, DTSC has the following comments for consideration:

1. DTSC recommends the Marin County Community Development Agency enter into DTSC's Standard Voluntary Agreement (SVA) program so a proper evaluation of the Project is completed. If entering into an SVA with DTSC, the [FLUXX portal link](#) is provided and the page also has a link to the [Fluxx User Guide](#) that can help you navigate the system. You will need to create a new profile and once in the system, click "Start a Request for Lead Agency Oversight Application." DTSC recommends that once the SVA is signed, a Preliminary Endangerment Assessment Report (PEA Report) be submitted for DTSC review. The PEA Report shall summarize all existing data and provide an evaluation of the possible risk to current and future users of the site. If you have any questions about the application portal, please contact the DTSC Brownfield Coordinator [Gregory Shaffer](#) or contact the [Application Portal Inbox](#)
2. 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](#). DTSC believes the Marin County Community Development Agency 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. DTSC may provide additional comments on the DEIR as further information becomes available.

DTSC appreciates the opportunity to comment on the North Coast Land Holdings Master Plan and Community Plan Amendment Project. 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 any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

Tamara Purvis

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cc: (via email)

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