



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

December 12, 2023

Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
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RE: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE GRANT
ELEMENTARY SCHOOL CAMPUS MASTER PLAN PROJECT, DATED OCTOBER 30,
2023 STATE CLEARINGHOUSE # [2023010229](#)

Dear Carey Upton

The Department of Toxic Substances Control (DTSC) received a DEIR for the Grant Elementary School Campus Master Plan Project. The Proposed Project, which involves implementation of a Campus Master Plan, would be constructed in three phases on approximately 5.41 acres of the 6.01-acre campus. Redevelopment and modernization of Grant ES includes the demolition and removal of some existing structures, renovation of three remaining structures, construction of two new buildings, new and reconfigured playfields and playgrounds, and two new and reconfigured parking lots. Ten existing modular and relocatable classroom buildings (P70 through P79), one modular building (playground restrooms), shade structures, and a portion of one permanent classroom building (Building B) would be selectively demolished and removed as part of the Proposed Project, for a total of 76,415 square feet of demolition. The remaining

buildings would remain as is. The Proposed Project would include renovation and expansion of the existing library (Building F), which would be combined with Building G to create a new Library and Maker space; interior renovation of the transitional kindergarten and kindergarten classrooms (Building A); and improvements to the Central Garden. The Proposed Project would include the construction of two new classroom buildings to replace the 10 portable classrooms that would be removed. Improvements to outdoor recreational areas and relocation and reconfiguration of the parking lot would also be implemented.

DTSC has identified that the Project's DEIR includes a Phase I Environmental Assessment (Phase I) in Appendix I. The Phase I was submitted separately to DTSC for review on September 27, 2022. DTSC issued a determination letter on the Phase I on December 19, 2022. The letter and additional information on [Grant Elementary School Site](#) can be found on EnviroStor. DTSC determined that a completion of Preliminary Environmental Assessment (PEA) is needed for the Site to address, but may not be limited to, the Recognized Environmental Conditions identified in the Phase I.

DTSC requests consideration of the following comments.

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), [§ 17210](#), [§ 17213.1](#), and [§ 17213.2](#), unless otherwise specifically exempted under section [§ 17268](#). If the district is not using CDE State funds for the project, or is otherwise specifically exempt under section [§ 17268](#), DTSC recommends the district continue to investigate and clean up the Site, if necessary, under the oversight of Los Angeles County and in concurrence with all applicable DTSC guidance documents. For more information on the CDE State funding, please visit [Office of Public School Construction](#) webpage.

A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

2. 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 2006 [Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers](#)
3. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within approved screening levels for the intended land use. 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 meets screening levels 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.


DTSC appreciates the opportunity to comment on the Grant Elementary School Campus Master Plan Project's DEIR. If you would like to proceed with DTSC's school

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environmental review process, please visit [DTSC's Evaluating & Clean-up School 3-Step Process](#) to begin a Phase I Environmental Site Assessment.

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,

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

Tamara Purvis
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