



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

May 21, 2024

Rhiannon Bailard
Chief Operating Officer
University of California College of the Law, San Francisco
200 McAllister Street
San Francisco, CA 94102
operations@uclawsf.edu

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE UNIVERSITY OF CALIFORNIA COLLEGE OF THE LAW, SAN FRANCISCO LONG RANGE CAMPUS PLAN UPDATE AND 201 GOLDEN GATE AVENUE MIXED-USE PROJECT DATED APRIL 10, 2024 STATE CLEARINGHOUSE NUMBER [2023060025](#)

Dear Rhiannon Bailard,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the University of California College of the Law, San Francisco Long Range Campus Plan Update and 201 Golden Gate Avenue Mixed-Use Project. The proposed Long Range Campus Plan (LRCP) Update would provide a high-level planning framework to guide land use and capital investment in the LRCP planning area, in line with the University of California College of the Law, San Francisco's (College) mission, priorities, and strategic goals. The LRCP planning area includes the entire existing College campus as well as the property owned by Unite Here Local 2 Union (Local 2) at 201-247 Golden Gate Avenue. The proposed 201 Golden Gate Avenue-Mixed Use Project (mixed-use development) would develop a new

12- or 13-story building at the Local 2 property, expanding the College's footprint by a quarter of a city block. The College has developed two conceptual scenarios (variants) for the proposed mixed-use development, referred to as Academic Light (Variant 1) and Academic Heavy (Variant 2). In either scenario, the proposed mixed-use development would involve the demolition of the existing on-site buildings, and the construction and operation of a new single building, with a mix of uses dedicated to academic/programmatic space, campus housing, and space for the hospitality workers labor union Local 2's operations and functions, including a hiring hall.

While reviewing the project, DTSC reached out to the University of California College of the Law, San Francisco on multiple attempts to retrieve the Phase I Environmental Site Assessment to no avail. The inability to retrieve the Phase I Environmental Site Assessment for our review did not allow us to view recommendations or conclusive evidence to dismiss any further action under CEQA; therefore, DTSC recommends and requests consideration of the following comments:

1. 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 Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).
2. All imported soil and fill material should be tested to ensure any contaminants of concern are within DTSC's and U.S. Environmental Protection Agency (USEPA) Regional Screen Levels (RSLs) 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

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material meets screening levels outlined in the [PEA](#) 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 appreciates the opportunity to comment on the University of California College of the Law, San Francisco Long Range Campus Plan Update and 201 Golden Gate Avenue Mixed-Use 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

Tamara Purvis

Associate Environmental Planner

HWMP-Permitting Division – CEQA Unit

Department of Toxic Substances Control

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cc: (via email)

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