



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

March 13, 2024

Mike Woolard
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Governor's Office of Planning & Research

Mar 13 2024

STATE CLEARINGHOUSE

RE: MITIGATED NEGATIVE DECLARATION (MND) FOR THE REDWOOD HIGH SCHOOL MUSIC, ARTS, AND DINING BUILDING, DATED FEBRUARY 16, 2024
STATE CLEARINGHOUSE # [2024020648](#)

Dear Mike Woolard,

The Department of Toxic Substances Control (DTSC) received a MND for the Redwood High School Music, Arts, and Dining Building (Project). The Project would demolish approximately 7,900 square-feet of buildings (ceramics building and music building) and approximately 24,500 square-feet of hardscape. The core of the Project involves constructing 32,107 square-feet of new buildings and modernizing/re-purposing the existing kitchen/cafeteria building (Building C). The new permanent buildings would be built in the northeast area of the school adjacent to the northeast parking lot. Proposed new buildings include an 11,094 square-foot two-story cafeteria and kitchen building, a 9,744-square-foot two-story music building, and a 6,648-square-foot two-story art and

ceramics building. Based on our review, 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, clean up the Site under the oversight of Marin County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the [Office of Public-School Consultation](#) 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. The Initial Study/Mitigated Negative Declaration states, “The Project would demolish approximately 7,900 square-feet of buildings (about 2,500 sq. ft. ceramics building and 4,400 sq. ft. music building) and approximately 24,500 square-feet of hardscape” ... If planned activities include building modifications/demolitions, 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, evaluate whether polychlorinated biphenyls (PCBs) containing materials is present in onsite buildings and address as necessary to protect human health

and the environment and sampling near current and/or former buildings should be conducted in accordance with [DTSC's Update to June 2006 Phase I Addendum Guidance](#).

3. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
4. 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. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, future environmental documents should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

DTSC appreciates the opportunity to comment on the MND for the Redwood High School Music, Arts, and Dining Building project. If you would like to proceed with DTSC's school 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

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clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

Tamara Purvis

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