



**Yana Garcia**  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

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



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

May 10, 2024

Christy Wong  
CEQA Project Manager  
Los Angeles Unified School District  
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Governor's Office of Planning & Research

**May 10 2024**

**STATE CLEARINGHOUSE**

RE: MITIGATED NEGATIVE DECLARATION (MND) FOR THE JAMES A. GARFIELD  
HIGH SCHOOL MAJOR MODERNIZATION PROJECT, DATED APRIL 17, 2024  
STATE CLEARINGHOUSE # [2024040744](#)

Dear Christy Wong,

The Department of Toxic Substances Control (DTSC) received a MND for the James A. Garfield High School Major Modernization Project (Project). The proposed Project includes the demolition of two permanent buildings and two portable buildings, demolition of a second-story pedestrian bridge, construction of a staff parking lot, and construction of a new permanent building that provides adequate learning spaces and support areas. Additionally, the proposed Project includes upgrades to and replacement of aging utilities and infrastructure, Internet Protocol (IP) convergence, and new landscaping and hardscaping. Limited modernization of existing structures including accessible facilities consistent with the requirements of the Americans with Disabilities Act (ADA) and seismic retrofit pursuant to California Assembly Bill

300 would also be implemented. 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 Los Angeles 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 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.

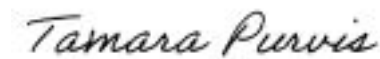
2. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal 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 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

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

Sincerely,



Tamara Purvis  
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HWMP – Permitting Division - CEQA Unit  
Department of Toxic Substances Control  
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Christy Wong

May 10, 2024

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cc: (via email)

Governor's Office of Planning and Research

State Clearinghouse

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