



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

September 18, 2024

Kevin Heerschap
Director, Facilities
Garden Grove Unified School District
11700 Knott Avenue
Garden Grove, CA 92841
kheerschap@ggusd.us

RE: MITIGATED NEGATIVE DECLARATION FOR THE MARK TWAIN SCHOOL
EXPANSION PROJECT, DATED SEPTEMBER 5, 2024 STATE CLEARINGHOUSE #
[2024090126](#)

Dear Kevin Heerschap,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Mark Twain School Expansion Project (Project). The District plans to add classrooms, office space, and play courts; reconfigure and expand parking; and add fencing improvements at the Mark Twain School campus (project site), which would disturb 5.3 acres of the 9.7-acre project site, and consolidate the District's two special education programs at the project site. The two special education programs include the Adult Transition Program, which is currently housed at the Jordan Secondary Learning Center and, the Mark Twain Special Education program currently housed at the project site. The Adult Transition Program will relocate to the project site

and the Mark Twain Special Education program will remain. DTSC recommends 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 Orange 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.

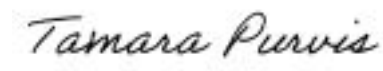
2. If planned activities other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal 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](#).
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 Regional Screen 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 outlined in the [PEA Guidance Manual](#) 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](#). 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 Mark Twain School Expansion 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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Kevin Heerschap
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Page 4

cc: (via email)

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