



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
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dtsc.ca.gov



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

March 20, 2025

Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
1717 4th Street
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RE: MITIGATED NEGATIVE DECLARATION FOR THE FRANKLIN ELEMENTARY
SCHOOL CAMPUS PLAN PROJECT DATED MARCH 11, 2025, STATE
CLEARINGHOUSE NUMBER [2025030429](#)

Dear Carey Upton,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Franklin Elementary School Campus Plan Project (Project). The proposed Project would renovate and modernize the existing Franklin Elementary School campus to develop new and updated facilities. At full buildout, the proposed Project would increase the campus building area by approximately 29,286 square feet. Redevelopment and modernization of Franklin Elementary School would consist of removing and demolishing seven permanent buildings, two modulars, and seven portable buildings; construct seven new buildings; and renovate one building and outdoor areas on the existing school campus and satellite facility. All entries to the school would be gated and/or secured After reviewing the Project, DTSC recommends and 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. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. 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 are suitable 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 Franklin Elementary School Campus Plan 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](#).

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

Sincerely,

Tamara Purvis

Tamara Purvis
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HWMP - Permitting Division – CEQA Unit
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cc: (via email)

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