



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
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Governor's Office of Planning & Research

DEC 17 2019

Mr. Greg Nelson
Marin Community College District
1800 Ignacio Boulevard, Building 17, Gilbane
Novato, California 94949

STATE CLEARINGHOUSE

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE COLLEGE OF MARIN KENTFIELD CAMPUS LEARNING AND RESOURCE CENTER PROJECT, COLLEGE AVENUE AND SIR FRANCIS DRAKE BOULEVARD, KENTFIELD, MARIN COUNTY (SCH #2019110285)

Dear Mr. Nelson:

The Northern California Schools Unit of the Department of Toxic Substances Control (DTSC) has received the notice of preparation (NOP) for an Environmental Impact Report for the College of Marin Kentfield Campus Learning and Resource Center project proposed by the Marin Community College District (District). The due date to submit comments is December 16, 2019.

As reported in the NOP, the project would involve the demolition and reconstruction of the Learning and Resource Center (LRC) in order to provide seismic safety and upgraded facilities. The new LRC building would include a library, computer laboratory, mailroom, student store, classrooms and offices. It would be constructed on the same building footprint as the existing LRC building located on College Avenue, which is located approximately 350 feet south of the intersection of College Avenue and Sir Francis Drake Boulevard in the City of Kentfield, Marin County, California (Site).

Based on a review of the NOP, DTSC would like to provide the following comments:

1. Because the project is school site related, DTSC recommends that an environmental review, such as a Phase I Environmental Site Assessment and/or Preliminary Environmental Assessment, be conducted to determine whether there has been or may have been a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present based on reasonably available information about the property and the areas in its vicinity. Such an environmental review should generally be conducted as part of the California Environmental Quality Act (CEQA) process. If the District elects to proceed and conduct an environmental

assessment at the Site under DTSC oversight, it should enter into a Voluntary Cleanup Agreement with DTSC to oversee the preparation of the environmental assessment.

2. The presence of existing, older or former structures at the Site may result in potential environmental concerns due to lead from lead-based paint and/or organochlorine pesticides from termiticide applications and polychlorinated biphenyls from electrical transformers, light ballast or window caulking or glazing. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006"*, and in accordance with the recommendations provided in the United States Environmental Protection Agency's website *"Polychlorinated Biphenyls (PCBs) in Building Materials"* (<https://www.epa.gov/pcbs/polychlorinated-biphenyls-pcbs-building-materials>).
3. If the Site is, or was previously, used for agricultural purposes, pesticides (such as DDT, DDE, and toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the *"Interim Guidance for Sampling Agricultural Soils (Third Revision)"*, dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.
4. The Project area appears to be located within 10-miles of geological units potentially containing naturally occurring asbestos (NOA). Pursuant to DTSC's *"Interim Guidance – Naturally Occurring Asbestos at School Sites, Revised September 24, 2004"*, further action should be considered and conducted to determine whether a naturally occurring hazardous material (i.e., NOA) is present on the Project area based on reasonably available information about the properties and the areas in the vicinity and a soil assessment.
5. If fill material exists on the Site, DTSC recommends these areas be investigated and possibly mitigated in accordance with DTSC's *"Information Advisory, Clean Imported Fill"*, dated October 2001.
6. If a response action is required based on the results of the above investigations, and/or other information, the Initial Study (IS) will require an analysis of the potential public health and environmental impacts associated with any proposed response action, pursuant to requirements of the California Environmental Quality Act (CEQA - Pub. Resources Code, Division 13, section 21000 et seq.), and its implementing Guidelines (California Code of Regulations, Title 14, section

15000 et seq.), prior to approval or adoption of a CEQA determination for the Project. A discussion of the mitigation and/or removal actions, if necessary, and associated cumulative impacts to the Project properties and the surrounding environment, should be included in the IS and final CEQA determination. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to the Project properties and the surrounding environment, are not available for inclusion in the IS, then an Addendum or Supplement to the final CEQA determination may be required.

DTSC is also administering the Revolving Loan Fund (RLF) Program which provides revolving loans to investigate and clean up hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

For additional information on DTSC's Schools process or RLF Program, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (916) 255-3695, or via email at Bud.Duke@dtsc.ca.gov.

Sincerely,



Harold (Bud) Duke, PG
Northern California Schools Unit
Site Mitigation and Restoration Program

cc: (via email)

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