

## CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

To: Office of Land Use and Climate Innovation  
State Clearinghouse  
1400 Tenth Street, Room 212  
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control  
Site Mitigation and Restoration Program  
5790 Corporate Avenue  
Cypress, CA 90630

**Project Title:** Franklin Elementary School Removal Action Workplan

**Project Location:** 527 Ventura Street, Altadena, California, 91101

**County:** Los Angeles

**Project Applicant:** Pasadena Unified School District

**Approval Action Under Consideration by DTSC:** Removal Action Workplan

**Statutory Authority:** California Health and Safety Code, Division 45

**Project Description:** The Removal Action Workplan (RAW) for the Franklin Elementary School campus implements activities to remove arsenic- and lead-impacted soils which were identified during a post-wildfire site assessment of the campus. The project is located on approximately 5.6 acres on the north side of Ventura Street between Lincoln Avenue and Tola Avenue in Altadena (Site). The project activities consist of excavating impacted soil, off-Site transportation of impacted soil for disposal, backfilling the excavated areas with clean imported fill material, and restoring Site conditions. The RAW establishes applicable cleanup goals and documents the basis for the selected remedy.

**Background:** The Site is an elementary school campus within the Pasadena Unified School District (PUSD). The school was closed in 2023 and was subsequently used by PUSD as a training facility until the Eaton Fire in January 2025. The campus has remained closed and unused since the Eaton Fire but is planned to be used as a swing space for other school campuses to move to during planned modernizations starting in August 2026. The Site includes classroom buildings, administration areas, landscaped areas, a playfield, and asphalt-paved playgrounds. The Site is bound by residential property and a water facility to the north; West Harriet Street, a library, a church, and residential property and Lincoln Avenue to the east; Ventura Street to the south; and residential properties to the west.

In January 2025, a series of major wildfires (including the Eaton Fire) swept through areas of Los Angeles and Ventura Counties. Several PUSD properties were affected by the strong winds and intense heat of the fire, resulting in damage and impacts from the Eaton Fire's ash, char, smoke, and soot.

On January 7, 2025, Governor Newsom declared a State of Emergency in response to the fires. Governor Newsom subsequently issued several Executive Orders aimed at addressing critical challenges in post-disaster recovery, including suspending environmental approvals and streamlining the building permitting process.

Following the wildfires, with assistance from DTSC and the Los Angeles County Department of Public Health (LACDPH), PUSD conducted site investigations at all of its school sites to assess the presence of hazardous substances. As a result of the site investigations, the Franklin Elementary School campus as well as several other school sites were identified as requiring soil remediation. On February 26, 2026, PUSD's Board of Trustees approved a resolution authorizing the removal and replacement of fire-impacted soil at multiple District sites. (Resolution No. 2864. State Clearinghouse No. 2026030159.)

**Project Activities:** The RAW consists of excavation and offsite disposal of approximately 198 cubic yards (cy) of contaminated soil from the upper two feet of the Site. Excavation will take place at three areas of the campus totaling approximately 2,678 sq. ft. (Refer to Figure 3 of the RAW for map of excavation locations.)

The excavated soil will be either loaded directly into waste transport trucks or soil bins, or stockpiled onsite for offsite disposal at appropriately licensed offsite facilities permitted to accept the waste. Based on the planned volume and weight of excavated soil (approximately 198 cubic yards, or 317 tons), approximately 15 truckloads

will be required for soil removal; a similar number of truck trips will be required for backfill, resulting in approximately 30 total truck trips.

Excavated soils will be replaced with DTSC-approved clean soil for reuse of the same or similar type as what was in the original location. Imported backfill materials will be tested to confirm that thresholds for residential Site standards are met. All imported backfill material will be approved by DTSC for use at the Site prior to bringing the material onsite. Confirmation samples will be collected prior to backfilling the excavations with clean imported soil.

In addition, landscaped areas will be replaced with like kind material, with the exception of mature, large trees which will be replaced with appropriately sized trees similar to what the District would plant for new construction and allowed under any local tree policies (i.e. 20-gallon trees and shrubs). Replacement of any utilities, hardscape, playground equipment, or other items, such as picnic tables, fencing, etc., that require removal to implement soil excavation will be completed as well.

The RAW includes a Transportation Plan and a Site-specific Health and Safety Plan. The project will also be subject to compliance with applicable South Coast Air Quality Management District (SCAQMD) regulations, including rules that address fugitive dust (Rules 403 and 1466).

The RAW activities are scheduled to take place during summer 2026 and be completed prior to the start of the 2026-27 academic year. Excavation and loading operations will occur between 7:00 am and 6:00 pm in conformance with Los Angeles County noise regulations.

Although not anticipated, in the event biological, cultural or historical resources are discovered in the course of project activities, work will be suspended while a qualified biologist, cultural or historical specialist makes an assessment of the area and arrangements are made to protect or preserve any resources that are discovered. If human remains are discovered, no further disturbance will occur in the location where the remains are found, and the County Coroner will be notified pursuant to the Health and Safety Code, Chapter 2, Section 7050.5.

**Name of Public Agency Approving Project:** Department of Toxic Substances Control

**Name of Person or Agency Carrying Out Project:** Pasadena Unified School District

**Exempt Status:** Governor's Executive Orders [EOs N-4-25, N-20-25, and N-29-25]; Emergency Projects [CCR Title 14, Sec. 15269]; Categorical Exemption: Class 30 [CCR Title 14, Sec. 15330]

**Reasons Why Project is Exempt:**

The project has been determined to be exempt from CEQA under each of the provisions identified below.

*Governor's Executive Orders*

Executive Orders (EOs) N-4-25, N-20-25, and N-29-25 were issued to expedite recovery efforts for areas affected by the Palisades, Eaton, Hurst, Lidia, Sunset, and Woodley Fires. The provisions of the EOs include suspending CEQA for projects to repair, restore, demolish, or replace property or facilities damaged or rendered unsafe as a result of the fires. Since the RAW activities consist of removal and replacement of soils that have been impacted by wildfires for which a State of Emergency was declared, the project meets the statutory exemption criteria for emergency projects. *Statutory Emergency Exemption*

CEQA Guidelines Section 15269 (which implements Public Resources Code Section 21080(b)(3)) exempts projects to maintain, repair, restore, demolish, or replace property or facilities damaged or destroyed as a result of a disaster in a disaster-stricken area in which a state of emergency has been proclaimed by the Governor pursuant to the California Emergency Services Act. Since the RAW activities consist of replacing and restoring soils which may have been impacted by fire analytes resulting from wildfires for which a State of Emergency was declared, the project meets the statutory exemption criteria for emergency projects.

*Class 30 Categorical Exemption*

The project meets the criteria for the Class 30 categorical exemption for the following reasons:

1. The project is a minor action designed to prevent, minimize, stabilize, mitigate or eliminate the release or threat of release of hazardous waste or hazardous substances.

2. The project is a removal action that will not exceed \$1 million in cost.
3. The project will be consistent with applicable State and local environmental permitting requirements.
4. The project does not involve the onsite use of a hazardous waste incinerator or thermal treatment unit.
5. The project does not involve the relocation of residences or businesses.
6. The project does not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code Section 25123. (Exception: Small-scale in situ soil vapor extraction and treatment systems which have been permitted by the Air Pollution Control District or the Air Quality Management District.)
7. The exceptions pursuant to Cal. Code Regs., tit. 14, § 15300.2 have been addressed as follows:
  - a. Cumulative Impact. The project will not result in cumulative impacts because it is designed to be a short-term, final remedy that would not lead to a succession of projects of the same type in the same place over time.
  - b. Significant Effect. The environmental safeguards and monitoring procedures that are enforceable and made a condition of project approval will prevent unusual circumstances from occurring so that there is no possibility that the project will have a significant effect on the environment.
  - c. Scenic Highways. The project will not damage scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, because it is not located within view of a highway officially designated as a state scenic highway.
  - d. Hazardous Waste Sites. The project is not located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
  - e. Historical Resources. The project will not cause a substantial adverse change in the significance of a historical resource.

The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control  
 Site Mitigation and Restoration Program  
 5790 Corporate Avenue  
 Cypress, CA 90630

Additional project information is available on EnviroStor:  
[https://www.envirostor.dtsc.ca.gov/public/profile\\_report.asp?global\\_id=60003865](https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60003865)

Project Manager's Name	Title	Phone Number
Zhilan (Kate) Zhang	Project Manager	(657) 777-9827

Branch Chief's Signature:	Date:
 <hr style="width: 60%; margin-left: 0;"/>	May 15, 2026

Branch Chief's Name	Title	Phone Number
Shahir Haddad, P.E.	Branch Chief	(714) 484-5368