



Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
5796 Corporate Avenue
Cypress, California 90630

<https://dtsc.ca.gov/>

Gavin Newsom
Governor

August 31, 2026

SENT VIA ELECTRONIC MAIL

Mr. Michael Dunning
Director, Facilities, M&O, and Transportation
Pasadena Unified School District
District Service Center
740 West Woodbury Road
Altadena, California 91001
Dunning.Michael@pusd.us

RESPONSE TO LONGFELLOW ELEMENTARY SCHOOL – FRONT LAWN SOIL
EXCAVATION UPDATE, LONGFELLOW MAGNET SCHOOL, 1065 EAST
WASHINGTON BLOUVD, PASADENA
(SITE CODE: 304715)

Dear Mr. Dunning:

The Department of Toxic Substances Control (DTSC) has reviewed the Front Lawn Soil Excavation Update (Update) for the Longfellow Magnet School Campus (Site), prepared by Verdantas on behalf of the Pasadena Unified School District (District) dated August 28, 2026. The Update presents an Arborist Assessment Report provided by Najjar Arbor Care stating that further air knife excavation of lead-contaminated soil around six protected trees will destabilize structural roots, leading to a high likelihood of tree failure. Also, the Update requests clarification from DTSC on whether a No Further Action Determination, and the State matching funds needed to complete school modernization projects can be obtained if contaminated soil within the critical root zones (CRZs) of these six trees is not removed.

Based on DTSC's review of the Update, a significant quantity of contaminated soil is present within the CRZs in the front lawn area. Per the March 25, 2026 Removal Action Workplan (RAW) approved by DTSC on May 15, 2026, this soil must be removed for

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DTSC to grant a No Further Action determination and support receiving State matching funds for the modernization project. The District attempted to excavate contaminated soil around six trees using air knife methodologies that may protect the trees, however the recent Arborist Report concluded that further excavation with an air knife would likely result in tree failure. Therefore, to remove contaminated soil, standard excavation methods requiring tree removal will be necessary. Any contaminated soil remaining at the Site will require long-term institutional controls, such as a land use covenant (LUC) to manage.

Section 4.8 of the DTSC-approved RAW notes that mature trees are present in the front lawn area and recommends replacement with appropriately sized trees, similar to what the District would plant for new construction. Tree removal was also envisioned in the California Environmental Quality Act Notice of Exemption filed with the State Clearinghouse on May 15, 2026. Removal and replacement of the contaminated soil is necessary to ensure the continued safe use of the Site. Infrastructure, trees, and vegetation that impede removal of contaminated soil should be removed and replaced as part of the removal action.

Any deviation from the approved removal action at the Site, such as bioremediation or managing contaminated soil through a LUC, will require the District to demonstrate that the deviation is equally protective of human health and safety as DTSC-approved RAW. If DTSC does not approve the deviation, the District will be required to remove the contaminated soil as proposed in the DTSC-approved RAW.

If you have any questions regarding the project, please contact Ms. Zhilan (Kate) Zhang, Project Manager, at (657) 777-9827 or by e-mail at Zhilan.Zhang@dtsc.ca.gov, or Mr. Aslam Shareef, Unit Chief, at (714) 484-5472 or by e-mail at Aslam.Shareef@dtsc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Stanphill', with a long horizontal line extending to the right.

Benjamin Stanphill, P.E.
Southern California Division Chief
Site Mitigation and Restoration Program

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cc: (via e-mail)

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Brownfields Restoration and Schools Evaluation Branch Reading File – Cypress