



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

August 29, 2022

Governor's Office of Planning & Research

Ms. Reema Mahamood
Planner III
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Aug 30 2022

STATE CLEARINGHOUSE

DRAFT ENVIRONMENTAL IMPACT REPORT FOR 1881 WEST SAN CARLOS
PROJECT – DATED JUNE 2022 (STATE CLEARINGHOUSE NUMBER: 2020120059)

Dear Ms. Mahamood:

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (EIR) for the 1881 West San Carlos Project (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

DTSC recommends that the following issues be evaluated in the Hazards and Hazardous Materials section of the EIR:

1. The Hazards and Hazardous Materials section of the EIR states that a Phase I Environmental Site Assessment (ESA) was performed for the Project site. The Phase I ESA concluded that the structure previously located at the rear of the 1881 West San Carlos Street building is listed in the EDR Historic Cleaners database due to its former use as a laundromat in 1950, but available documentation did not identify that space was used for dry cleaning purposes. It was also determined that the site was planted with orchards in 1953, which causes the potential for impacts onsite due to residual agricultural chemicals.

The Phase I ESA indicated that four off-site sites of concern were determined to warrant additional discussion in the Phase I ESA. The first location is an off-site

facility located at 32 Brooklyn Avenue that is registered as a non-generator of hazardous waste under the Resource Conservation and Recovery Act Non-Generator database. The second is a site located on the 1886 West San Carlos Street. It is listed in multiple regulatory databases for removal and off-site disposal of hazardous substances, as an auto wrecking/miscellaneous simple facility, and as a hazardous waste generator facility. The third off-site facility is located at 1915 West San Carlos Street and is listed under multiple regulatory databases identifying it as a registered hazardous waste generator and chemical storage facility with reported violations, a hazardous waste generator, and an auto wrecking/miscellaneous simple facility.

The fourth off-site facility is located at 30 Cleveland Avenue and is listed under multiple regulatory databases. It was occupied by dry cleaning tenants from 1966 to 1977. Per the EIR, the Regional Water Quality Control Board's (RWQCB's) GeoTracker records indicate that the northeastern corner of the West San Carlos Street and Cleveland Avenue intersection formerly contained one 2,000-gallon UST that was used for storage of gasoline and one 7,500-gallon UST that was used for storage of perchloroethylene or petroleum distillates. Low concentrations of contaminants were detected in site soils and due to the lack of PCE in samples, the RWQCB determined that the agency did not need to open a case.

The Phase I ESA concluded that based on the prior removal of the USTs, soil and groundwater sampling results, releases relative to groundwater flow, and current regulatory status, the site does not represent a significant environmental concern.

Aside from the RWQCB's involvement pertaining to USTs at the northeastern corner of the West San Carlos Street and Cleveland Avenue, the EIR does not identify an appropriate agency that has provided regulatory oversight and concurrence that the proposed project is protective of human health and the environment. The EIR states that the Project site and four offsite locations do not represent significant environmental concerns. However, it does not identify a qualified agency under which these determinations were made. A regulatory agency such as DTSC or RWQCB, or a qualified local agency that meets the requirements of [Assembly Bill 304 \(AB304\)](#), should provide regulatory concurrence that the site is safe for construction and the proposed use.

2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel

additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aurally deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the EIR.

3. If buildings or 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 2006 Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers.](#)
4. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to [DTSC's 2001 Information Advisory Clean Imported Fill Material.](#)
5. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 [Interim Guidance for Sampling Agricultural Properties \(Third Revision\).](#)

DTSC appreciates the opportunity to comment on the EIR. Should you choose DTSC to provide oversight for any environmental investigations, please visit DTSC's [Site Mitigation and Restoration Program](#) page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at [DTSC's Brownfield website.](#)

Ms. Reema Mahamood
August 29, 2022
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If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Gavin McCreary". The signature is fluid and cursive, with the first name "Gavin" being more prominent than the last name "McCreary".

Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research
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