



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

September 17, 2024

Lisa Costa Sanders
Principal Planner
City of San Carlos
Community Development Department, Planning Division
600 Elm Street
San Carlos, CA 94070
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RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE ALEXANDRIA CENTER FOR LIFE SCIENCE PROJECT DATED JULY 25, 2024, STATE CLEARINGHOUSE NUMBER [2021060668](#)

Dear Lisa Costa Sanders,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the Alexandria Center for Life Science Project (Project). The proposed Project includes the removal of existing commercial and industrial buildings and construction of a new office/research and development (R&D) campus including six life science office/R&D buildings with a total of approximately 1,603,375 square feet of building space, 4,500 square feet of retail/commercial space, and 11,543 square feet of amenity space, which may include a daycare. Other improvements include two above-grade parking structures, open space and stormwater management including improvements to Pulgas Creek, pedestrian and bicycle connections, landscaping, and circulation/parking elements.

After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. The proposed project encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has conducted oversight that may be impacted as a result of this project. This may restrict what construction activities are permissible in the proposed project areas in order to avoid any impacts to human health and the environment. One of these clean-up sites is the [Tanklage Square](#) (Tanklage). The Project is located southwest of the Tanklage, which has a Land Use Covenant (LUC). Based on past investigations at Tanklage, it is recommended that the City of San Carlos should characterize groundwater and soil vapor at the proposed Project site to determine the need for potential vapor mitigation. As part of the Tanklage characterization, "Chlorinated volatile organic compounds (VOCs) including tetrachloroethylene (PCE) and trichloroethylene (TCE) were identified in groundwater off-site to the west/southwest of the former dry-cleaning operation [Tanklage site] (Ramboll, 2017)."
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](#).
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 PEA Guidance Manual](#).

DTSC believes the City of San Carlos must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA. DTSC recommends the department connect with our unit if any hazardous waste projects managed or overseen by DTSC are discovered. Please refer to the [City of San Carlos EnviroStor Map](#) for additional information about the areas of potential contamination. If further concerns or impacts surface in light of the any forthcoming environmental documents, DTSC reserves the right to provide additional comments at that time.

DTSC appreciates the opportunity to comment on the DEIR for the Alexandria Center for Life Science Project. 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 [email](#) for additional guidance.

Sincerely,

Tamara Purvis

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