



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

March 7, 2025

Lisa Costa Sanders
Principal Planner
City of San Carlos
600 Elm Street, Planning Division
San Carlos, CA 94070
LCostaSanders@cityofsancarlos.org

RE: MITIGATED NEGATIVE DECLARATION FOR THE 789 OLD COUNTY ROAD
PROJECT DATED FEBRUARY 26, 2025, STATE CLEARINGHOUSE NUMBER
[2025020976](#)

Dear Lisa Costa Sanders,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the 789 Old County Road Project (Project). The proposed Project would involve the construction of two new office/research and development (R&D) buildings: a 5-story, 179,665 square foot building, and a 4-story, 146,983 square foot building, with maximum heights of approximately 85 and 69 feet to the roof respectively. DTSC recommends and requests consideration of the following comments:

1. According to the Initial Study (IS)/MND, EnviroStor and GeoTracker, the Site and surrounding locations are impacted by historical contamination due to the historical use of manufacturing, plating, commercial fueling facilities, etc. Due to these contaminations, there are multiple cleanup agreements with DTSC and the San Francisco Bay Regional Water Quality Control Board for the surrounding locations. The IS/MND also notes that Phase I and II Environmental Site Assessments and/or Investigations for the surrounding locations were completed, and the findings were incorporated into the IS/MND. Due to the ongoing contaminations nearby, DTSC recommends the City of San Carlos address the

contaminations within the Project area through a Phase I Environmental Site Investigation and/or receive oversight from a [self-certified local agency](#), DTSC or the Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, please note DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have any questions about the application portal, please contact your [Regional Brownfield Coordinator](#).

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 prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).
3. If buildings or structures are to be demolished on any Project sites within 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 these 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 appreciates the opportunity to comment on the MND for the 789 Old County Road 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

Lisa Costa Sanders

March 7, 2025

Page 3

would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

Sincerely,

Tamara Purvis

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cc: (via email)

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