



**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**

July 18, 2025

Nimisha Agrawal  
Senior Planner  
City of Santa Clara  
1500 Warburton Avenue  
Santa Clara, CA 95050  
[NAgrawal@SantaClaraCA.gov](mailto:NAgrawal@SantaClaraCA.gov)

RE: MITIGATED NEGATIVE DECLARATION FOR THE 1400 COLEMAN AVENUE  
RESIDENTIAL PROJECT DATED JULY 15, 2025, STATE CLEARINGHOUSE  
NUMBER [2025070609](#)

Dear Nimisha Agrawal,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the 1400 Coleman Avenue Residential Project (Project). The Project proposes construction of 142 residential units spread between 13 townhome-style buildings. Each building would contain seven to 20 residential units. Each townhome would have a one- or two-car garage on the ground floor, with residential units located above. The Project would include a dog park, community garden, common outdoor seating, paseos, and lawn areas for residents. The project proposes a General Plan Amendment from Regional Commercial to High Density Residential and a rezoning to accommodate the project. DTSC recommends and requests consideration of the following comments:

1. The document recommended a Soil Management Plan (SMP) be prepared and implemented during earthwork redevelopment activities in case soil impacts are encountered during grading and excavation activities. As part of this SMP, any on-site contaminated soils, including soils that could potentially

be imported to the Project site, would be assessed to confirm that they are handled in compliance with all applicable regulatory guidance. DTSC does not recommend a SMP be used as a primary cleanup plan. DTSC recommends that any potential contamination be fully characterized and then remediated under the oversight of a [self-certified local agency](#), DTSC or Regional Water Quality Control Board. A SMP alone cannot sufficiently identify and document the potential contaminants that may pose a threat to human health and the environment. DTSC recommends that a cleanup plan, a Removal Action Workplan (RAW) or Remedial Action Plan (RAP), be prepared to adequately address all site impacts after complete characterization.

2. Table 1 (Summary of Project Impacts and Mitigation) of the Draft MND states: “MM HAZ-1.1: Prior to the issuance of building demolition or grading permits, the project applicant shall provide soil vapor sampling results to Santa Clara Fire Department (SCFD) that show no presence of chlorinated hydrocarbons at concentrations exceeding State of California cleanup levels for residential use.” SCFD is not a self-certified local agency so, in the event contamination is found, DTSC recommends the City of Santa Clara 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 that 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 the relevant [Regional Brownfield Coordinator](#) for your Project.
3. DTSC recommends that all imported soil/fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment 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/fill material there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The sampling should include analysis based on the source of the soil/fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

4. The Phase I Environmental Site Assessment states the property was historically used for dry land farming. Typically, dry land farming does not use pesticides/herbicides for crops but utilizes them for weed control wherein several contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet approved local area baselines or thresholds. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC would like to thank you for the opportunity to comment on the MND for 1400 Coleman Avenue Residential 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 our [CEQA Review email](#) for additional guidance.

Nimisha Agrawal

July 18, 2025

Page 4

Sincerely,

*Dave Kereazis*

Dave Kereazis

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HWMP-Permitting Division – CEQA Unit

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