

From: [Kereazis, Dave@DTSC](mailto:Kereazis_Dave@DTSC)
To: [Sonal Aggarwal](#); [CEQARReview](#)
Cc: [LCI State Clearinghouse](#); toby@chxtd.com; [Purvis, Tamara@DTSC](mailto:Purvis_Tamara@DTSC); [Wiley, Scott@DTSC](mailto:Wiley_Scott@DTSC)
Subject: RE: Mitigated Negative Declaration (MND) for the Nolan-Stevaux New Single-Family Residence SCH #2026020674
Date: Thursday, February 26, 2026 9:27:30 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Good morning Sonal Aggarwal,

Thank you for your inquiry. The Department of Toxic Substances Control (DTSC) has established guidance for sampling former agricultural properties and while not a new statute, the guidelines generally recommend Pesticides and Organochlorine Pesticides historically used on the property should be tested. In the event the agricultural use ended prior to 1950, testing is not required.

Here are some sections referenced from our guidance:

2.1 Eligible Agricultural Properties

This guidance is specific to agricultural properties where pesticides and/or fertilizers were presumably applied uniformly, for agricultural purposes consistent with normal application practices. It is applicable to agricultural properties that are currently under cultivation with row, fiber or food crops, orchards, or pasture. It is also applicable to fallow and former agricultural properties that are no longer in production and have not been disturbed beyond normal disking and plowing practices. Each field of the same crop is assumed to have been watered, fertilized and treated with agricultural chemicals to the same degree across the field. Because of this homogeneous application, contaminant levels are expected to be similar at any given location within the field. This is the underlying premise of the guidance, and one that must be verified at the scoping stage of the PEA process.

2.2 Properties not covered by this Guidance

This guidance does not apply to former agricultural property that has been graded for construction or other purposes, that has received fill, or has had parking lots or structures placed on it following active use as an agricultural field. An urban residential area that was agricultural property in the past does not qualify for this guidance since the construction of the residences would have resulted in the disturbance and redistribution of potential agricultural contaminants in the soil. These areas may require biased, discrete sampling as opposed to the sampling for agricultural properties discussed in this document.

2.4 Agricultural Properties Prior to 1950

A review of 35 proposed school sites along with the historical background of OCP use in California indicates that sites with agricultural usage ending prior to 1950 do not need to be evaluated for OCPs. Organochlorine pesticides were first introduced into California agriculture in 1944 and reached peak usage in the 1960's. In 1974 the use of the DDT was banned for agricultural purposes, and the elimination of remaining OCPs in California agriculture quickly followed. Data from 35 proposed school sites where agricultural use ended prior to 1950 indicates that OCPs were not identified as

chemicals of potential concern. In those cases where OCPs were identified, the source appears to have been the application to structures on the property, and not the agricultural crops grown prior to 1950. It is recommended that former agricultural properties that terminated operation prior to 1950 not be evaluated for agriculturally related OCPs. Arsenic should still be evaluated as a chemical of potential concern (COPC) since its use as arsenical pesticides and herbicides predates 1950.

Thank you for your email and have a great rest of your week.

Dave Kereazis

Associate Environmental Planner
HWMP-Permitting (CEQA Unit)
Department of Toxic Substances Control
California Environmental Protection Agency
Dave.Kereazis@dtsc.ca.gov
(916) 255-6446



From: Sonal Aggarwal <Saggarwal@smcgov.org>
Sent: Wednesday, February 25, 2026 2:33 PM
To: CEQARReview <ceqareview@dtsc.ca.gov>
Cc: state.clearinghouse@lci.ca.gov; toby@chxtld.com; Purvis, Tamara@DTSC <Tamara.Purvis@dtsc.ca.gov>; Kereazis, Dave@DTSC <Dave.Kereazis@dtsc.ca.gov>; Wiley, Scott@DTSC <Scott.Wiley@dtsc.ca.gov>
Subject: RE: Mitigated Negative Declaration (MND) for the Nolan-Stevaux New Single-Family Residence SCH #2026020674

Hello Dave,

Thanks for your comments. Just wondering if there are any recent State Law changes that require such soil tests for sites that are not farmed in the last 40 years. Just trying to understand the requirements better, so I can do the needful and pass along the information to the applicant.

Thanks for your response in advance.

Regards,



Sonal Aggarwal (she/her)
Planner III

County of San Mateo
Planning & Building Department
455 County Center 2nd Floor
Redwood City, CA 94063
www.smcgov.org/planning

From: CEQAReview <ceqareview@dtsc.ca.gov>

Sent: Tuesday, February 24, 2026 8:08 AM

To: Sonal Aggarwal <Saggarwal@smcgov.org>

Cc: state.clearinghouse@lci.ca.gov; toby@chxtld.com; Purvis, Tamara@DTSC <Tamara.Purvis@dtsc.ca.gov>; Kereazis, Dave@DTSC <Dave.Kereazis@dtsc.ca.gov>; Wiley, Scott@DTSC <Scott.Wiley@dtsc.ca.gov>

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Good morning Sonal Aggarwal,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the [Nolan-Stevaux New Single-Family Residence](#) project. Attached are DTSC's comments for consideration.

DTSC appreciates the opportunity to comment on the MND for the Nolan-Stevaux New Single-Family Residence. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances.

CEQA Unit

HWMP-Permitting

Department of Toxic Substances Control

California Environmental Protection Agency

CEQAReview@dtsc.ca.gov

