



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

May 22, 2026

Melissa Kersh
Project Manager
Santa Clara Unified School District
1889 Lawrence Road
Santa Clara, CA 95051
Mkersh@scusd.net

RE: MITIGATED NEGATIVE DECLARATION FOR THE TOWNSEND FIELD
IMPROVEMENT PROJECT DATED MAY 20, 2026, STATE CLEARINGHOUSE
NUMBER [2026050819](#)

Dear Melissa Kersh,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the Townsend Field Improvement Project (Project). The Project proposes to replace the existing turf field with an enlarged natural grass field and remove the existing concrete bleachers and replace with new, metal bleachers. The existing track would be replaced with a new synthetic, all-weather track and the existing stadium lighting with new, energy efficient stadium lighting at Townsend Field and Elmer Johnson Field and install new lighting at the Buchser Middle School tennis courts. The Project also involves replacement of the press box, PA system, and bathroom building while existing concession buildings would be demolished. DTSC recommends and requests consideration of the following comments:

1. If the Santa Clara Unified School District (District) plans to use California Department of Education (CDE) State funds for the Project, then the District shall comply with the requirements of Education Code (EDC), [§17210](#), [§17213.1](#), and [§17213.2](#), unless otherwise specifically exempted under [§17268](#). If the District is

not using CDE State funds for the Project or is otherwise specifically exempt under [§17268](#), DTSC recommends the District continue to investigate, clean up the Site under the oversight of Santa Clara County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the [Office of Public-School Construction](#) webpage. A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

2. 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 Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).
3. DTSC recommends all imported soil/fill material be tested to ensure all COCs meet screening levels as outlined in [DTSC's PEA Guidance Manual](#). Furthermore, 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 soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

DTSC would like to thank you for the opportunity to comment on the MND for the Townsend Field Improvement Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances.

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If you would like to proceed with DTSC's school environmental review process, please visit [DTSC's Evaluating & Clean-up School 3-Step Process to begin a Phase I Environmental Site Assessment](#). 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.

Sincerely,



Dave Kereazis
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cc: (via email)

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