

# County of Santa Clara

Department of Environmental Health

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August 8, 2014

Ms. Yen Chen, Associate Planner  
City of Santa Clara  
1500 Warburton Ave.  
Santa Clara, CA 95050

**RE: File #CEQ2014-01178 – Centennial Gateway Mixed-Use Project**

Dear Ms. Chen:

The County of Santa Clara Department of Environmental Health (Department), acting as the Local Enforcement Agency (LEA), received a notification that an EIR is being prepared for the above project. The impacts studied in the EIR for Hazards and Hazardous Material and other appropriate sections, must include descriptions and mitigations for the possible adverse effects from the City of Santa Clara All-Purpose Landfill. Our department has been delegated by the State of California EPA to regulate this landfill in accordance with Title 14 and Title 27 of the California Code of Regulation.

The project is within 1000 feet of a closed landfill. Parcel 3 is immediately adjacent to the closed landfill and several million tons of buried mixed municipal solid waste. Landfills can produce explosive methane gas and other toxic gases that can migrate away from their boundaries and across property lines in the soil. Similarly, liquid waste called leachate, can also migrate through the soils to neighboring properties.

The LEA provides the following comments regarding the proposed EIR:

1. The Project description does not mention the proposed use for Parcel 3 with the existing tennis courts, which is part of APN 10403-036. This "Parcel", although not a separated property, is part of the City of Santa Clara All-Purpose Landfill, which closed in the late 1980's. This property is primarily an unlined landfill containing several million tons of mixed municipal solid waste. Any structure proposed or any alteration of the existing use must be reviewed and approved by two agencies within the California EPA and this Department. We will determine compliance with the pertinent regulations concerning public protection for the threats of methane and other gases as well as the exposure to leachate liquids. The project must also protect the integrity of the close landfill, as well

as prevent the movement of landfill waste byproducts away from the existing containment area.

2. There is a discussion of a proposed new parking structure which is to be connected to an existing parking structure. This new structure for parking would necessitate below grade excavations connecting to Parcels 1 and 2, as inferred by the statement that the connections would be under the podium foundations. The EIR should make clear the extent and estimated depth of any below grade excavations, which could potentially intercept soil lenses containing landfill gases or leachate liquids.
3. The parcels 1 and 2, since they are on parcels adjacent to the closed landfill, should have construction features that include gas migration control engineering features with explosive gas sensors. Typically this involves the construction of deep impermeable walls below grade, also known as 'cut-off walls', or any other engineered feature that would prevent explosive gas or toxic leachate from entering the parking garage or buildings.

The LEA, CalRecycle and the RWQCB will all be responsible agencies for this project, by virtue of the inclusion of Parcel 3, which is the landfill parcel. The City, as lead agency, should not approve the Environmental Impact Report for this project without considering the concerns and findings by these Responsible Agencies. Please send to us any draft and final EIR, Initial Studies, or any supporting documentation for this project.

Thank you for the opportunity to comment on this NOP. We value working together in addressing the concerns for potential risks this project poses for the environment and the community.

If you have any questions, please feel free to call me at (408) 918-1964 or Stan Chau at (408) 918-1961. I can also be reached at [chris.rummel@deh.sccgov.org](mailto:chris.rummel@deh.sccgov.org)

Sincerely,



Chris Rummel  
Acting Program Manager  
Solid Waste Programs  
Hazardous Materials Compliance Division

Cc: Stan Chau, Senior Environmental Health Specialist, [stan.chau@deh.sccgov.org](mailto:stan.chau@deh.sccgov.org)  
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