



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control



**Gavin Newsom**  
Governor

Meredith Williams, Ph.D.  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630

June 3, 2019

Governor's Office of Planning & Research

June 3, 2019

**STATE CLEARINGHOUSE**

Ms. Kristin Blackson  
City of Escondido  
Planning Division  
201 North Broadway  
Escondido, California 92025  
[kblackson@escondido.org](mailto:kblackson@escondido.org)

NOTICE OF PREPARATION FOR DRAFT ENVIRONMENTAL IMPACT REPORT,  
PALOMAR HEIGHTS, ESCONDIDO (SCH# 2019059013)

Dear Ms. Blackson:

The Department of Toxic Substances Control (DTSC) has received your submitted document for the above-mentioned project. The project proposes development of a 13.8-acre site for both residential and commercial uses. Based on the review of the submitted document DTSC has the following comments:

1. The Environmental Impact Report (EIR) should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances.
2. The EIR should identify any known or potentially contaminated sites within the proposed project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment.
3. The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials or wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the

potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state laws, regulations and policies.

4. All environmental investigations, sampling and/or remediation for the site should be conducted under a workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.
5. Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR.
6. If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.
7. If the site was used for agricultural or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.

DTSC appreciates the opportunity to review the Initial Study. Should you need any assistance in environmental investigation, please submit a request for Lead Agency Oversight Application which can be found at:

<https://www.dtsc.ca.gov/SiteCleanup/Brownfields/voluntary-agreements-guide.cfm>.

Ms. Kristin Blackson  
June 3, 2019  
Page 3

Should you have any questions regarding this letter, please contact me at (714) 484-5392 or by email at [ChiaRin.Yen@dtsc.ca.gov](mailto:ChiaRin.Yen@dtsc.ca.gov).

Sincerely,



Chia Rin Yen  
Environmental Scientist  
Brownfields Restoration and School Evaluation Branch  
Site Mitigation and Restoration Program

mv/cy/yg

cc: (via e-mail)

Governor's Office of Planning and Research  
State Clearinghouse  
[State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov)

Mr. Dave Kereazis  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Ms. Yolanda Garza  
Brownfields Restoration and School Evaluation Branch  
Site Mitigation and Restoration Program  
[Yolanda.Garza@dtsc.ca.gov](mailto:Yolanda.Garza@dtsc.ca.gov)