



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
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SENT VIA ELECTRONIC MAIL

May 25, 2023

Ms. McKina Alexander

City of Carson

Community Development Department, Planning Division

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Carson, California 90745

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RE: DTSC COMMENTS ON THE NOTICE OF PREPARATION OF DRAFT
ENVIRONMENTAL IMPACT REPORT FOR SYWEST PROJECT, SCH# [2023040605](#)

Dear Ms. Alexander:

The Department of Toxic Substances Control (DTSC) received and reviewed the Notice of Preparation (NOP) Draft Environmental Impact Report (DEIR) for the SyWest Project, located at 20151 South Main Street in Carson, California (Site). The DEIR is proposed by Southbay-Carson LLC, a California limited liability company and will evaluate two potential land use scenarios for the Site: 1. Retail Shopping Center (Preferred Land Use Scenario), and 2. Commerce Center (Secondary Land Use Scenario).

As stated in the NOP “...the project Site is a brownfield and is listed on the DTSC EnviroStor database as a voluntary cleanup. In connection therewith, prior to the issuance of this NOP, the project applicant, in coordination with DTSC and the City [of Carson], had commenced investigation activities (including implementation of an approved preliminary assessment workplan to be followed by remediation, pursuant to a removal action workplan, once approved by DTSC) to allow restoration of the project site to its existing site

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condition as a surface parking lot. This remediation and restoration work is being implemented separate and apart from the proposed project being evaluated in this DEIR.”

DTSC and the City of Carson entered into a Master Standard Voluntary Agreement (SVA) Docket No. HSA FY-21/22-129) on June 27, 2022, to oversee the investigation and cleanup of the Site. DTSC provides the following comments:

1. This statement is unclear: “This remediation and restoration work is being implemented separate and apart from the proposed project being evaluated in this Draft EIR.” The proposed remedy will be a project component for either the Preferred or Secondary Land Use Scenario and should be identified and analyzed within the DEIR. DTSC, as a Responsible Agency, will rely on the City’s Final EIR to comply with CEQA requirements for the implementation of the proposed remedy.
2. A Preliminary Endangerment Assessment (PEA) Workplan was conducted in December 2022 to assess the vertical extent of the landfill materials beneath the Site, characterize Site soils for profiling for waste handling and disposal, and obtain geotechnical information concerning the Site to support its future commercial redevelopment. The results were evaluated in a PEA Report and DTSC is currently reviewing the findings. The PEA Report indicates that soil, soil vapor, and groundwater beneath the Site are impacted. Following DTSC’s approval of the PEA Report, additional investigation will occur to further evaluate the former landfill Site, and later remediation will follow.
 - a. The DEIR should include the contaminate history and all related site investigation reports. The DEIR should also identify and analyze the proposed remediation activities to address the contaminants.
 - b. The NOP, page two, paragraph three, , states “: “In connection therewith, prior to the issuance of this NOP, the project applicant, in coordination with DTSC and the City, had commenced investigation activities (including implementation of an approved preliminary assessment work plan to be followed by a supplemental site investigation and later remediation pursuant to a remedial action plan, once approved by DTSC) to allow restoration of the project site to its existing site

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- condition as a surface parking lot. For clarification, please note the underlined and italicized text in the sentence.
- c. The NOP states that the Site will be restored to the existing condition as a surface parking lot. The DEIR should identify and clarify that the proposed use of the Site will include a commercial development with buildings.
 3. The DEIR should include a discussion regarding the landfill gas collection system on the Project Site.
 4. If the proposed project requires the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 Information Advisory Clean Imported Fill Material [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#)

DTSC appreciates the opportunity to provide comments regarding the SkyWest Project. . Please contact me at rania.zabaneh@dtsc.ca.gov or (714) 484-5479, if you would like to discuss.

Sincerely,

Rania A. Zabaneh

Project Manager

Site Mitigation and Restoration Program

cc: (via email)

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Ms. Tamara Purvis
Associate Environmental

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