



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

July 11, 2024

Nick Taylor

Principal Planner

City of Anaheim, Planning and Building Department

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Anaheim, CA 92805

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RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HILLS PRESERVE
PROJECT DATED JULY 5, 2024, STATE CLEARINGHOUSE NUMBER [2023080600](#)

Dear Nick Taylor,

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the Hills Preserve Project (Project). The Project site consists of 76-acres of undeveloped land; 14.2 acres would be developed with multiple-family residential uses, 5.3 acres would be developed with single-family residential uses, 11.8 acres would be developed with commercial uses, and the remaining 43.2 acres would be designated as open space, with 1.5 acres dedicated for private streets. The Project's multiple-family residential component consists of 498 wrap-style apartment units to be constructed around the perimeter of a parking structure. The multiple-family residential component would include an 18,100 square foot lobby including leasing offices, lounge areas, mailroom, and a library; 4,380 square feet of private bowling lanes; 2,500 square feet of dedicated resident office areas and conference rooms; and a pool, gym, and locker room. The Project would also include six single-family residences on lots ranging

from 34,429 to 42,207 square feet. The anticipated density would be approximately 1.13 units/acre. The Project would also include a commercial component, consisting of a total of 80,000 square feet of building area and associated parking.

DTSC recommends and requests consideration of the following comments:

1. 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](#).
2. When agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are Dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [HHRA NOTE NUMBER 3, DTSC-SLs](#) approved thresholds. If they are not, remedial action must take place to mitigate them below those thresholds.
3. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required
4. DTSC recommends that all imported soil and fill material should be tested to assess any COCs meet screening levels as outlined in the [PEA Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information](#)

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[Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary.

To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC appreciates the opportunity to comment on the DEIR for the Hills Preserve Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,



Dave Kereazis
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cc: (via email)

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