



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

December 8, 2023

Nancy Lee

Governor's Office of Planning & Research

City of El Monte

Dec 11 2023

Planning Division

STATE CLEARINGHOUSE

11333 Valley Boulevard

El Monte, California 91731

Nancy Lee - nlee@elmonteca.gov

City of El Monte Planning Division Planning@elmonteca.gov

DTSC COMMENTS ON THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
FOR THE PASEO SANTA FE PROJECT (AREA Y), CITY OF EL MONTE, LOS
ANGELESCOUNTY - STATE CLEARINGHOUSE NUMBER: [2023110298](#)

Dear Nancy Lee:

The Department of Toxic Substances Control (DTSC) reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) for the Paseo Santa Fe Project located in El Monte, California (Project Site). The proposed project involves the development of 18 three-story, 40-foot tall, multi-family residential buildings, totaling 87 condominium townhome units and associated private driveways on a 4.95-acre site. The condominium townhome units would range from 1,387 gross square feet (sf) and 1,837 gross sf (approximate). The proposed project would have a total building area of approximately 141,887 sf. Additionally, the proposed project would involve the construction of a 0.79-acre city park that would be accessed via Monterey Avenue. A portion of El Monte Avenue would be converted to a pedestrian walkway that is referred to in the project plans as the El Monte Paseo. The El

Monte Paseo, at 6,220 sf in area, would provide a pedestrian link from Valley Boulevard to the El Monte Metrolink Station and El Monte Trolley Station.

Environmental Background

Recent environmental site assessments have been completed at the Project Site, under the oversight of DTSC. Results of the assessments indicate that select areas of the Project Site are impacted with lead, arsenic, and dieldrin in soil and total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs), specifically tetrachloroethene (PCE) in soil vapor.

Groundwater at the Project Site has not yet been evaluated, but assessment of groundwater may be required depending on the results of the next round of soil vapor sampling. Onsite areas with identified residual contamination will be remediated based on the final approved environmental site characterization reports outlining the required remedial activities. At this time, there are existing data gaps/environmental concerns at the Project Site which require further assessment by the Project environmental consultant (Tetra Tech). Final remedial alternatives cannot be evaluated until onsite impacts have been fully characterized.

The following comments pertaining to the IS/MND for the Project Site are provided by DTSC Site Mitigation and Restoration Program (SMRP) and the Human and Ecological Risk Office (HERO):

Global Comments:

1. Draft Supplemental Site Investigation (SSI) Report
 - a. There are two versions of the SSI Report, both of which remain in draft format: 1) Draft SSI Report, dated April 2023, which summarizes the December 2022 environmental investigation conducted at the Project Site, and 2) The Addendum to the SSI Report, dated September 2023, which summarizes the July 2023 environmental investigation.

- b. Tetra Tech recently submitted the revised version of the Addendum to the SSI Report, dated November 2023. Results of the April 2023 SSI Report are included in the November 2023 Addendum. Since all three versions of the SSI Report remain as draft, **DTSC requests that the September 2023 Addendum to the SSI Report be removed from the IS/MND CEQA State Clearing House webpage until it is approved by DTSC as final.**

The September 2023 draft SSI Report is described and referenced throughout the IS/MND. **The draft SSI has not yet received DTSC final approval and is therefore subject to change. This should be clarified throughout the IS/MND where the draft SSI Report is discussed.**

2. The sentence mentioned throughout the document, *“In addition, dieldrin was detected on the project site at concentrations marginally above regulatory levels at two locations; however, using the maximum concentration limit, the detected dieldrin concentrations were found to have a risk of two in one million, which is acceptable to DTSC and therefore no further action is required.”*

Strike out the following text: “which is acceptable to DTSC and therefore no further action is required.” The text should be replaced with the following: “which is within acceptable US EPA’s risk management range.”

3. The sentence mentioned throughout the document, *“However, after elimination of VOC sources, new future buildings, and the site being adequately characterized, the 0.001 attenuation factor is considered the appropriate threshold for the project. As such, VOCs are at acceptable risk levels.”*

Strike out the entire sentence. DTSC has not approved the use of a 0.001 attenuation factor for the Project Site.

4. This sentence mentioned throughout the document, *“In summary, arsenic, lead, TPH, VOCs, and dieldrin would not exceed current regulatory levels and would not pose a significant environmental hazard.”*

Strike out: VOCs, and dieldrin. DTSC does not concur with this statement and the levels of VOCs in soil vapor and dieldrin in soil at select areas of the Project Site require further delineation.

5. This sentence mentioned throughout the document, *“Furthermore, housekeeping activities were performed on the project site in December 2022 and January 2023,*

which involved removal of all soils containing levels of arsenic and lead that exceeded regulatory screening levels.”

Delete the word “all” before the word “soils.”

6. This sentence stated throughout the document, *“However, after elimination of VOC sources, new future buildings, and the site being adequately characterized, the 0.001 attenuation factor is considered the appropriate threshold for the proposed project.”*

Strike out the entire sentence. DTSC has not approved the use of a 0.001 attenuation factor for the Project Site.

7. Please include the phrase “when remediated” at the end of the following sentence stated throughout the document: *“In addition, soils containing TPH, VOCs, and dieldrin concentration levels within the project site would not exceed acceptable regulatory risk levels.”*

Specific Comments:

1. Bottom of page 72 in the Hazards and Hazardous Substances Section 9, Mitigation Measure *HAZ-1 Soil Remediation Work* - **Strike out the text “...without further conditions or obligations...” As with any property, if new contamination is discovered at the Project Site in the future, it may require additional investigation and cleanup.**
2. The last sentence on page 75 and first line of page 76: For DTSC to close a Site, if it is cleaned up to unrestricted land use, a Site would be referred to as “Certified.” If any land use restrictions are placed on a Site to restrict land use to commercial and/or industrial land use, only, then DTSC refers to the closure of a Site as “Certified Operations & Maintenance (O&M) with Land Use Restriction.”

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DTSC does not use the phrase "Completed - Case Closed." Therefore, please strike this phrase from the IS/MND.

DTSC appreciates the opportunity to provide comments on the Paseo Santa Fe IS/MND. 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 any clarification on DTSC's comments, Please contact me via email at rania.zabaneh@dtsc.ca.gov or by phone at (714) 403-7875.

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Sincerely,



Rania A. Zabaneh
Project Manager
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: via e-mail

Candace M. Hill
Senior Environmental Planner
CEQA Unit
DTSC-Cal Center
candace.hill@dtsc.ca.gov

Dina Kourda, CEG, CHg
Engineering Geologist
Geological Services Branch
DTSC-Cypress
dina.kourda@dtsc.ca.gov

Dr. Sandipan Datta, Ph.D
Staff Toxicologist
Human and Ecological Risk Office
DTSC-Cypress
sandipan.datta@dtsc.ca.gov

Meghan Hearne, M.S., G.I.T.
Unit Chief – Office of Brownfields, Project Manager Unit
Site Mitigation and Restoration Program
DTSC-Cypress
meghan.hearne@dtsc.ca.gov

Governor's Office of Planning and
Research State Clearinghouse
State.Clearinghouse@opr.ca.gov

Dave Kereazis
Associate Environmental Planner
CEQA Unit – HWMP
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP – Permitting Division - CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

Tamara Purvis
Associate Environmental Planner
CEQA Unit – HWMP
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov