



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

April 2, 2025

Leo Oorts
Planning Manager
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503
CDDInfo@torranceca.gov

RE: MITIGATED NEGATIVE DECLARATION FOR SEQUOIA COMMERCE CENTER
DATED MARCH 06, 2025, STATE CLEARINGHOUSE NUMBER [2025030225](#)

Dear Leo Oorts,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for Sequoia Commerce Center (Project). The proposed Project consists of the construction of two industrial buildings totaling 276,300 square feet (square feet) on a 14.02-acre site. Building 1 consists of a 120,466-square-foot industrial building and Building 2 consists of a 155,834-square-foot industrial building. The proposed Project will require a Conditional Use Permit to allow the construction of the industrial warehouse buildings; and a Tentative Parcel Map No. 83184 to consolidate three existing parcels into two. DTSC recommends and requests consideration of the following comments:

1. There are several areas of which DTSC has regulatory oversight over that are near or within the proposed project site, whether they are listed as having documented contamination, land use restrictions, are subject to a Hazardous Waste Facility Permit, or the potential for the project site to be included on a list of hazardous materials sites compiled pursuant to Government Code

Section 65962. DTSC is overseeing environmental investigation activities at [19145 Gramercy Place](#) (Site) located in Torrance which is under a Standard Voluntary Agreement. The Site has detections of tetrachloroethylene (PCE), trichloroethylene (TCE), and 1,1-dichloroethylene (1,1-DCE) in groundwater above California MCLs on-Site at maximum concentrations of 20, 200, and 22 micrograms per liter (ug/L), respectively. These contaminants have also been found to the east and northeast of 19145 Gramercy Place at maximum concentrations of 10 ug/L PCE, 320 ug/L TCE, and 24 ug/L 1,1-DCE. Additionally, PCE, TCE and chloroform were detected in all soil vapor samples at concentrations above their respective screening levels at a maximum concentration of 23,900 ug/L, 106,000 ug/L, and 330 ug/L, respectively as seen in the [Additional Site Investigation Report](#) for the subject Site prepared by Terraphase Engineering Inc., Figure 5,. VOCs in Groundwater. These contaminants are likely impacting the Project location that is subject to this CEQA analysis.

2. DTSC recommends the City of Torrance enter into a voluntary agreement to address contamination at brownfields and other types of properties or receive oversight from a [self-certified local agency](#), DTSC or Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have any questions about the application portal, please contact your [Regional Brownfield Coordinator](#).
3. DTSC highly recommends that an environmental regulatory oversight agency be engaged early on when contamination is known or suspected. Please visit [DTSC's Brownfield Webpage](#) for additional guidance.

4. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment Guidance Manual](#).

Additionally, DTSC advises referencing the [DTSC Information 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 prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC would like to thank you for the opportunity to comment on the MND for the Sequoia Commerce Center. 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 our [CEQA Review email](#) for additional guidance.

Sincerely,

Tamara Purvis

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cc: (via email)

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