



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

July 18, 2025

Michael Ressler
City Planner
City of Vista
200 Civic Center Drive
Vista, CA 92084
mressler@vista.gov

RE: MITIGATED NEGATIVE DECLARATION FOR THE TTLC VISTA OLD TAYLOR, LLC PROJECT DATED JULY 9, 2025, STATE CLEARINGHOUSE # [2025070373](#)

Dear Michael Ressler,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the TTLC Vista Old Taylor, LLC Project (Project). The Project consists of a residential development located at 938 Taylor Street in Vista, California 92084. The applicant, TTLC Vista Old Taylor LLC, proposes the demolition and removal of existing houses, agricultural uses, and other improvements to construct 28 single-family residences, which would result in a proposed density of 4.05 dwelling units per acre. The Project also involves on- and off-site infrastructure improvements, including a stormwater detention basin and the off-site extension of water, sewer and storm drain lines to connect to the City's infrastructure. DTSC recommends and requests consideration of the following comments:

1. A Phase I and a Limited Phase II Environmental Site Assessment (ESA) was prepared by GeoTek, Inc. and presented to TTLC Management on November 1, 2021. GeoTek's conclusions and recommendations (Section 11.0 of the ESA) states, "Please be aware that prior to demolition of any of the existing Site structures, federal and state regulations require asbestos-containing

materials (ACM) and lead-based paint (LBP) surveys be performed.” This recommendation should be adopted and included in the environmental document and therefore, 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 LBPs or products, mercury, ACMs 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. Additional conclusions and recommendations included in the Phase I and a Limited Phase II ESA prepared by GeoTek, Inc. state, “There is visual evidence of poor “housekeeping” regarding abundance household trash/debris, plant debris, agricultural operations trash/debris, as well as sealed environmental contaminants and petroleum products. Care should be taken by a qualified professional to remove these items from the Site and dispose of them at a proper facility prior to any future development”, therefore when agricultural crops and/or land uses are proposed or rezoned for residential use, several 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 approved local area baselines or thresholds. If they do not, remedial action must take place to mitigate them below those thresholds. 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. These

recommendations should be adhered to and become part of the environmental document. Please refer to the [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#) for the most updated guidance and screening levels.

3. DTSC recommends that all imported soil/fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's PEA 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/fill material there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

DTSC would like to thank you for the opportunity to comment on the MND for the TTLC Vista Old Taylor, LLC 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 our [CEQA Review email](#) for additional guidance.

Sincerely,



Dave Kereazis

Associate Environmental Planner

HWMP-Permitting Division – CEQA Unit

Department of Toxic Substances Control

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Michael Ressler

July 18, 2025

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cc: (via email)

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