



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

October 15, 2025

Kirsten Uchitel
Project Manager
San Diego Association of Governments
1011 Union Street, Unit 400
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RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 2025 REGIONAL PLAN
DATED AUGUST 22, 2025, STATE CLEARINGHOUSE NUMBER 2023010039

Dear Kirsten Uchitel,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the 2025 Regional Plan (Project). The San Diego Association of Governments has prepared the Draft Program Environmental Impact Report (EIR) to evaluate the 2025 Regional Plan (Plan). The proposed Plan is an update to the Amended 2021 Regional Plan approved in 2023. The proposed Plan improves transportation, equity, and the environment for people in the greater San Diego region over the next several decades. It considers how the region is expected to grow and change and provides a blueprint for the regional transportation network, land use, housing, and more.

There are several areas of which DTSC has regulatory oversight over that are 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 65962.5. Therefore, DTSC recommends further coordination with the Department in the event that the proposed Project may impact any

of the areas that may fall under DTSC's oversight. In particular, the [Ketema Aerospace and Electronics site](#) and the [Magnolia Elementary School site](#) have contaminated groundwater at a relatively shallow depth. DTSC recommends and requests consideration of the following comments:

1. DTSC is currently working with California Department of Transportation to address the issue with the water removal activities at the Bradley Avenue pumphouse within the [Ketema Aerospace and Electronics site](#). Future excavation/road improvement work in this area might encounter contaminated groundwater and/or vapor intrusion issues. Therefore, DTSC recommends a proper notification system be set in place, so DTSC can be involved in the early stage(s) of the future earth disturbance work in this area to address these potential issues.
2. 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](#).
3. 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. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

4. Although it is not anticipated that munitions, munitions debris, or other explosive hazards associated with the FUDS site will be identified within the boundaries of the Project site, DTSC recommends performing additional research on the FUDS boundaries in relation to the Project site. Should a suspected military munition be encountered at the Project Site: **Recognize** that munitions are dangerous; **Retreat** — do not approach, touch, move or disturb it, but carefully leave the area; and **Report** immediately what you saw and where you saw it to local law enforcement — call 911.

DTSC would like to thank you for the opportunity to comment on the DEIR for 2025 Regional Plan. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions regarding these comments, please contact us via our [CEQA Review email](#).

Sincerely,



Dave Kereazis
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cc: (via email)

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