



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

September 19, 2025

Sean del Solar
Principal Planner/Sustainability Program Manager
City of San Marcos
1 Civic Center Drive
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RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SAN MARCOS CREEK DISTRICT SPECIFIC PLAN UPDATE DATED SEPTEMBER 12, 2025, STATE CLEARINGHOUSE NUMBER [2025090620](#)

Dear Sean del Solar,

The Department of Toxic Substances Control (DTSC) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the San Marcos Creek District Specific Plan Update (Project). The Project proposes a mixed-use development including Residential (2,273 units built as small-lot subdivisions, townhomes, and multi-unit apartments and condominiums), Commercial (724,221 square feet of retail, entertainment and cultural development), Open Space, Roadways, Trails, Paths and Parking.

DTSC recommends and requests consideration of the following comments:

1. 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 recent guidance and screening levels.

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 fill and knowledge of prior land use. Additional

information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

DTSC reserves the right to comment on any future circulated documents related to this Project based on our review or proposed or incorporated changes, measures, or project features. DTSC would like to thank you for the opportunity to comment on the NOP of a DEIR for the San Marcos Creek District Specific Plan Update. 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,

Tamara Purvis

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Sean del Solar
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cc: (via email)

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