



# County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH  
LAND AND WATER QUALITY DIVISION  
P.O. BOX 129261, SAN DIEGO, CA 92112-9261  
Phone: (858) 565-5173 Fax: (858) 694-3670  
[www.sdcdeh.org](http://www.sdcdeh.org)

**AMY HARBERT**  
ASSISTANT DIRECTOR

August 6, 2020

SD Riverwalk LLC  
c/o Mr. Pete Shearer  
600 W Broadway, Suite 1150  
San Diego, CA 92101

Dear Mr. Shearer:

VOLUNTARY ASSISTANCE PROGRAM (VAP) CASE - DEH 2019-LSAM-000585  
SD RIVERWALK, LLC  
5905 FRIARS ROAD AND 1150 FASHION VALLEY ROAD  
SAN DIEGO, CA 92110

Staff of the Department of Environmental Health, Site Assessment and Mitigation Program (SAM) have reviewed the July 21, 2020 *Soil Management Plan Revision 2* (SMP), prepared by SCS Engineers. The SMP describes the scope of work for the segregation, reuse and disposal of soils to be excavated at this Site during a grading project whereby approximately 195 acres will be redeveloped into various land uses including residential, mixed use, open space, park, office, and retail.

Based on the results of soil sampling data, it is anticipated that approximately 40,000 cubic yards of arsenic-bearing soil will be reused on Site. A deed restriction will be issued detailing the final burial location of the arsenic-bearing soil.

Although two of the soil samples (B37-0.5 and SB61-0.5) exceeded the Tier 1 Environmental Screening Level (ESL) for chlordane, none of the previously taken Organochlorine Pesticide (OCP) samples exceeded the Site Specific Mitigation Criteria (SSMC) noted in the report. Based on this, all of the OCP soil below the SSMCs will be reused on site. This includes the soil from the aeras of B37-0.5 and SB61-0.5, which will be covered by surface improvements. Confirmation OCP samples will also be taken beneath the slabs of the three existing maintenance buildings following demolition, and any other areas if deemed necessary.

Excavation activities in the former Underground Storage Tank (UST) aeras will be overseen by an environmental monitor with samples collected if indications of petroleum hydrocarbons are observed, such as staining, odors, elevated field readings, or free product. Moreover, if unanticipated contamination is noted during the course of mass excavation and grading activities, the soil will be segregated, profiled and either exported from the Site to a properly licensed facility, or managed based on sampling results.

Dewatering is not currently anticipated. If required, the water will be treated as necessary with discharges permitted accordingly.

The SMP is *approved* with the following condition. Prior to commencement of work a *Community Health and Safety Plan* (CHSP) will need to be submitted and approved.

If you have any questions, please call me at (858) 505-6856.

Sincerely, **Ewan Moffat** Digitally signed by Ewan  
**PG CHg** Moffat PG CHg  
Date: 2020.08.06 08:11:52  
-07'00'

Ewan Moffat PG 7207, CHg 972, Project Manager  
Site Assessment and Mitigation Program

cc: Mr. Luke Montague, SCS Engineers.