



June 27, 2024

*Delivered Via Email and Hand Delivery*

City Attorney Patrick Q. Sullivan  
City of Torrance Attorney's Office  
3031 Torrance Boulevard  
Torrance, CA 90503

**RE: Proposed Torrance Del Amo Project**

November 16, 1987 LeRoy Crandall Report states "Petroleum were noted at random depths in Boring 4. Tests to determine the extent and type of any hazardous materials beneath the site were not within the scope of this investigation." The Log of Boring 4 dated October 16, 1987 states "Petroleum stain and odor at random depths from 2-1/2 feet to 18 feet" below the surface.  
*2325 Crenshaw Boulevard, Torrance, California*

Dear City Attorney Sullivan:

The purpose of this letter is to provide important information to you regarding the health, safety, and welfare of the public and as follow-up to my letter dated June 12, 2024. I wrote "if contamination is found, an additional subsurface investigation should take place to determine the lateral and vertical extent of contamination." In fact, petroleum hydrocarbon contamination was found in Boring 4 in 1987 to a depth of 18 feet below the surface on the subject site. The Log of Boring 4, dated October 16, 1987, states "Petroleum stain and odor at random depths from 2-1/2 to 18 feet" below the surface. The full extent of "hazardous materials" was not determined as stated by Leroy Crandall on page 3 of their report dated November 16, 1987. The testing required to determine the extent or type of any hazardous materials beneath the site were "not within the scope of the investigation." Petroleum odor and an oil stain were found in two other boring locations at the subject site. Water seepage was noted at 14 feet below the surface in Boring 4. Exhibit A contains the Cover Pages, Page 3 and Log of Boring 4 of the aforementioned Leroy Crandall Report. An environmental professional has a duty, as part of their due-diligence, to search for environmental conditions that may pose a risk to public safety. Further, a California licensed professional geologist in the state of California is required to put public safety first.

The California Code of Regulations Title 16, Division 29- Professional Standards and Code of Professional Conduct - Professional Geology and Professional Geophysics states (in part):

*"To protect and safeguard the health, safety, welfare, property of the public, and California's environmental quality, every person who is licensed by the Board as a professional geologist or professional geophysicist, including licensees employed in any manner by a governmental entity or in private practice, shall comply with the professional standards in this section. A violation of any*

2121 Yacht Yankee  
Newport Beach, California 92660  
www.tri-s.com

Tel: (949) 698-8851

*of the following professional standards shall constitute unprofessional conduct and shall be sufficient grounds for disciplinary action."*

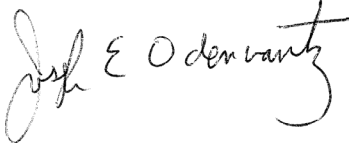
The author of the March 14, 2024 five-page Responses to Comments on the Torrance del Amo Project MND is a professional by the name of Ms. Kerrie Nicholson (attached as Exhibit B). It should be noted that these responses were addressed at the June 18, 2024 City Council meeting and by Planner Mr. Leo Oorts who cited them as authority. In fact, the aforementioned CAJA letter appears as pages 1-5 of the 436 pages of RTCs (at the very top of the stack) on the City of Torrance website, Torrance Del Amo Project page under the heading *Comments Letters and Response to Comments*. Ms. Nicholson's LinkedIn page reflects, a. that she is based in Boise, Idaho, b. has an undergraduate degree in Geography from California State University, Northridge, and c. that she is not a Professional Engineer or Professional Geologist in the state of California or elsewhere. Both Ms. Nicholson and, Mr. Brake, PG of Geocon West, Inc. (the author of the Phase I Investigation dated July 5, 2022), missed the factual information available for their review regarding the existence of potentially hazardous materials in the subsurface on the subject site. All professionals who sign off on environmental reports should adhere to standards and safeguards especially as it pertains public health. Further, how can an environmental professional determine whether there will be significant adverse environmental impacts on a site without determining the extent of potentially hazardous petroleum hydrocarbons without following up on documented petroleum contamination to a depth of 18 feet below the surface? The MND is seemingly flawed. **I believe, and have provided facts to support my opinion, there is substantial evidence to support the necessity of a thorough subsurface environmental investigation and/or an environmental impact report at the subject site prior to any construction taking place.**

I have attached as Exhibit C the Department of Toxic Substances and Control (DTSC) letter dated February 23, 2024 addressed to Mr. Peerapol Suree in which the author recommends "a proper evaluation of the Project is completed". I am attaching that letter here for the copy of my June 12, 2024 letter that appears on your website was seemingly printed out in black and white and then rescanned in. As such, the link I provided to that letter was not active and the public may have some difficulty finding that letter. There are active links in the June 12, 2024 DTSC letter authored by Environmental Planner Mr. Dave Kereazis and an original copy of that letter, with active links, can be requested from him by sending a request to his email address or [Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov). I have attached an email from Mr. Kereazis received on May 17, 2024 as Exhibit D. I have also attached an email from Mr. Jonathon Rinella, PE, Associate Civil Engineer, Los Angeles County Public Works received on May 15, 2024 as Exhibit E.

In closing, the environmental contamination issues were addressed at the City Council meeting on June 18, 2024 and were seemingly dismissed by the developer and their Counsel. I prepared this letter on my own volition and as a public citizen. Please perform the proper testing to determine the extent of contamination prior to any construction. The facts provided from the 1987 soil investigation demonstrate the existence of petroleum hydrocarbons to a depth of eighteen feet below the surface. The determination of the extent and type of any hazardous materials beneath the site has yet to be completed.

*Intentional left blank*

Very truly yours,



Joseph E. Odencrantz, Ph.D., P.E., BCEE, PH  
California Registered Professional Civil Engineer C 61137 (expiration 12/31/2024)  
Board Certified Environmental Engineer 23-E0041 (expiration 12/31/2024)  
Professional Hydrologist 24-HGW-05002 (expiration 1/15/2029)

Enclosures

- Exhibit A Cover Pages, Page 3 and Log of Boring 4 Leroy Crandall Report (11/16/1987)
- Exhibit B CAJA letter-Reponses to Comments on the Torrance del Amo Project MND (3/14/24)
- Exhibit C DTSC Letter regarding a proper evaluation of the subject site (2/24/24)
- Exhibit D Email from Mr. Dave Kereazis, Environmental Planner, DTSC,  
California Environmental Protection Agency-Sacramento (5/17/24)
- Exhibit E Email from Mr. Jonathan Rinella, PE, Associate Civil Engineer,  
Los Angeles County Public Works (5/15/24)

Cc: Mr. Dave Kereazis, Environmental Planner, DTSC  
Mr. Jonathan Rinella, PE, Associate Civil Engineer, Los Angeles County Public Works  
Ms. Susana Arrendondo, Executive Officer, Los Angeles Regional Water  
Quality Control Board

## Exhibit A

Cover Pages, Page 3 and Log of Boring 4 Leroy Crandall  
Report (11/16/1987)

COPY 2 OF 2  
TEAM WORKING  
COPY

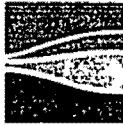
REPORT OF FOUNDATION INVESTIGATION  
PROPOSED SOUTH COASTAL DIVISION HEADQUARTERS BUILDING  
CRENSHAW BOULEVARD AND SEPULVEDA BOULEVARD  
TORRANCE, CALIFORNIA  
FOR THE  
SOUTHERN CALIFORNIA GAS COMPANY  
(OUR JOB NO. A-87413)

RECEIVED

NOV 17 1987

CHCG





November 16, 1987

Southern California Gas Company  
Engineering Services Department  
Box 3249, Terminal Annex  
Los Angeles, California 90051

SoCal Contract No. 1752  
(Our Job No. A-87413)

Attention: Ms. G. Sheri Conley, P.E.  
Staff Engineer  
Civil/Architectural Design  
Engineering Services Department

Gentlemen:

Our "Report of Foundation Investigation, Proposed South Coastal Division Headquarters Building, Crenshaw Boulevard and Sepulveda Boulevard, Torrance, California, for the Southern California Gas Company" is herewith submitted.

The scope of the investigation was planned in collaboration with Ms. G. Sheri Conley. Information regarding the structural features of the proposed building and the requirements for the investigation were furnished us by Mr. James Thompson of Thompson and LaBrie, Structural Engineers, and by Mr. Mark S. Lamoureux of Carl W. Donmoyer & Associates, Civil Engineers.

Existing fill soils were not encountered in the borings drilled within the proposed building area. Compacted fill soils, six to eight feet in thickness, were encountered in three of the borings located in the proposed parking area. The natural soils beneath the site consist of silty sand, clayey sand, and clay. The upper natural soils are only moderately firm at present moisture content and would become weaker and more compressible when wet. The soils become firmer and less adversely affected by water with depth. We recommend that any uncompacted fill soils and the upper natural soils be excavated and compacted and that the required additional fill be properly compacted. If the grading recommendations are followed, the proposed building may be supported on spread footings established on properly compacted fill.

Recommendations for foundation design, for grading, and for floor slab and paving support are presented in the report. The results of corrosion studies by M. J. Schiff & Associates are also presented.

Respectfully submitted,

LeROY CRANDALL AND ASSOCIATES



by

A handwritten signature in cursive script that reads "Marshall Lew".

Marshall Lew, Ph.D.  
Senior Engineer/Vice President

X87/MD/ge  
(3 copies submitted)

cc: (2) CHCG Architects Inc.  
Attn: Mr. Dasol Mashaka  
(1) Thompson and LaBrie  
(1) Carl W. Donmoyer & Associates



SOIL CONDITIONS

Existing fill soils were not encountered in the borings drilled within the proposed building area. Compacted fill soils, six to eight feet in thickness, were encountered in Borings 7, 8, and 9 in the proposed parking area. The fill consists of silty sand and was firm at the boring locations. The fill was placed during grading for the adjacent development, which was observed and tested by our firm (our Job No. B-86213). The approximate limits of the compacted fill are shown on Plate 1.

The natural soils beneath the site consist of silty sand, clayey sand, and clay. The upper natural soils are only moderately firm at present moisture content and would become weaker and more compressible when wet. The soils become firmer and less adversely affected by water with depth.

Water seepage was encountered at depths of 10 and 14 feet in two of the exploration borings.

Petroleum stains and odors were noted at random depths in Boring 4. Tests to determine the extent or type of any hazardous materials beneath the site were not within the scope of this investigation.





MS

CHKD

dmh

W.P.

MD

O.E.

dmh

D

JMK

F.T.

DATE

10/27/87

A-87413

# BORING 4

DATE DRILLED: October 16, 1987  
EQUIPMENT USED: 20" - Diameter Bucket

ELEVATION 78.3

Note : The log of subsurface conditions shown hereon applies only at the specific boring location and at the date indicated. It is not warranted to be representative of subsurface conditions at other locations and times.

ELEVATION (ft.)	DEPTH (ft.)	MOISTURE (% of dry wt.)	DRY DENSITY (lbs./cu. ft.)	DRIVE ENERGY (ft.-kips/ft.)	SAMPLE LOC.	DESCRIPTION
75	5	3.7	99	7	SM	SILTY SAND - fine, dark brown
		11.2	120	8		Petroleum stain and odor
		12.1	124	8		Grey
70	10	10.8	122	10	SC	CLAYEY SAND - fine, petroleum stain, greyish brown
65		12.9	122	7		
60	15	10.9	121	7	CL SC	SANDY CLAY and CLAYEY SAND (ALTERNATE LAYERS) - greenish brown
						Petroleum odor
55	20	11.6	115	8		
25		6.8	114	7	SP	SAND - fine to medium, light reddish brown

NOTE: Water seepage encountered at a depth of 14'. No caving. Petroleum stain and odor at random depths from 2-1/2' to 18'.

## LOG OF BORING

LeROY CRANDALL AND ASSOCIATES

PLATE A - 1.4

## Exhibit B

CAJA letter-Reponses to Comments on the Torrance del  
Amo Project MND (3/14/24)



9410 Topanga Canyon Boulevard, Suite 101  
Chatsworth, CA 91311  
Phone 310-469-6700

~~March 14, 2024~~

Brent Stoll  
Rose Equities  
8383 Wilshire Boulevard, Suite 632  
Beverly Hills, CA 90211

**Re: Responses to Comments on the Torrance del Amo Project MND**

Dear Mr. Stoll:

**CAJA Environmental Services, LLC (CAJA)** has reviewed the comment letters submitted on the mitigated negative declaration (MND) prepared for the Torrance del Amo Project and has prepared responses to these comments.

If you have any questions or require additional information, please do not hesitate to contact me. Thank you.

Sincerely,

Kerrie Nicholson

## **DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

### **Comment 1**

The Department of Toxic Substances Control (DTSC) has reviewed the MND for the Torrance Del Amo Project, which evaluates the proposed development of a 272-unit, 3-5-story residential condominium development over a two-level subterranean parking garage located on a 239,632 square-foot lot (or 5.5 Acre).

In July 2022, a Phase I Environmental Site Assessment (ESA) was prepared for the project by GEOCON West, Inc. The ESA identified past petroleum production at the site in addition to above-ground storage tanks, an oil derrick and well, and apparent waste oil and water ponds in addition to other recognized environmental concerns. All of these were reported to be contaminated by “disposal surface impoundment”. There are no records of any cleanup activities or oversight therefore, a Soil Management Plan (SMP) was recommended by GEOCON West, Inc. as noted in the Initial Study Mitigation Measure HAZ-1. Furthermore, asbestos-containing materials and lead-based paint could be encountered at the project site during demolition and remodeling phases.

### **Response to Comment 1**

This comment summarizes the Project description and the Phase I Environmental Site Assessment prepared for the Project and is not a comment on the adequacy of the MND. Thus, no further response is required.

### **Comment 2**

DTSC recommends the City of Torrance adhere to the following:

1. The City of Torrance enter into DTSC’s Standard Voluntary Agreement (SVA) program or seek oversight with the Los Angeles County Site Mitigation Unit so a proper evaluation of the Project is completed. If entering into an SVA with DTSC, the FLUXX portal link is provided and the page also has a link to the Fluxx User Guide that can help you navigate the system. You will need to create a new profile and once in the system, click “Start a Request for Lead Agency Oversight Application.” DTSC recommends that once the SVA is signed, a Preliminary Endangerment Assessment Report (PEA Report) be submitted for DTSC review. The PEA Report shall summarize all existing data and provide an evaluation of the possible risk to current and future users of the site. If you have any questions about the application portal, please contact the DTSC Brownfield Coordinator Gregory Shaffer or contact the Application Portal Inbox.

## **Response to Comment 2**

The comment states that the City should consider entering into the DTSC's Standard Voluntary Agreement (SVA) program or seek oversight with the Los Angeles County Site Mitigation Unit. The Project developer will follow all applicable federal, state, regional, and local regulations related to the implementation of the Soil Management Plan (SMP), including any oversight, as determined and directed by the City. The comment will be provided to the decision-makers for further consideration in conjunction with approval of the SMP.

## **Comment 3**

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 June 2006 Phase I Addendum Guidance.

## **Response to Comment 3**

The comment states that if the Project includes the demolition of any buildings, surveys for lead-based paint/materials, mercury, asbestos-containing materials, and polychlorinated biphenyl caulk should be conducted and if found, should be removed in accordance with applicable state regulations. The Project developer would follow all applicable federal, state, regional, and local regulations related to the identification and removal of lead-based paint/materials, mercury, asbestos-containing materials, and polychlorinated biphenyl caulk.

## **Comment 4**

3. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within approved screening levels for the intended land use. 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

meets screening levels for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use.

**Response to Comment 4**

This comment states that imported soil/fill should be tested for contaminants. The Project does not include imported soil/fill.

**Comment 5**

DTSC appreciates the opportunity to review and comment on the MND for Torrance Del Amo 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 concerns, please contact me or a member of our CEQA Unit Team.

**Response to Comment 5**

This comment includes closing comments and is not a comment on the adequacy of the MND. Thus, no further response is required.

## Exhibit C

DTSC Letter regarding a proper evaluation of the subject  
site (2/24/24)



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

February 23, 2024

Peerapol Suree

Planning Associate

City of Torrance

3031 Torrance Boulevard

Torrance, CA 90503

[psuree@torranceca.gov](mailto:psuree@torranceca.gov)

RE: MITIGATED NEGATIVE DECLARATION (MND) FOR THE TORRANCE DEL AMO PROJECT, DATED FEBRUARY 8, 2024 STATE CLEARINGHOUSE NUMBER:

[2024020302](#)

Dear Peerapol Suree,

The Department of Toxic Substances Control (DTSC) has reviewed the MND for the Torrance Del Amo Project, which evaluates the proposed development of a 272-unit, 3-5-story residential condominium development over a two-level subterranean parking garage located on a 239,632 square-foot lot (or 5.5 Acre).

In July 2022, a Phase I Environmental Site Assessment (ESA) was prepared for the project by GEOCON West, Inc. The ESA identified past petroleum production at the site in addition to above-ground storage tanks, an oil derrick and well, and apparent waste oil and water ponds in addition to other recognized environmental concerns. All of these were reported to be contaminated by "disposal surface impoundment". There are no records of any cleanup activities or oversight therefore, a Soil Management Plan (SMP) was recommended by GEOCON West, Inc. as noted in the Initial Study Mitigation



Measure HAZ-1. Furthermore, asbestos-containing materials and lead-based paint could be encountered at the project site during demolition and remodeling phases. DTSC recommends the City of Torrance adhere to the following:

1. The City of Torrance enter into DTSC's Standard Voluntary Agreement (SVA) program or seek oversight with the [Los Angeles County Site Mitigation Unit](#) so a proper evaluation of the Project is completed. If entering into an SVA with DTSC, the [FLUXX portal link](#) is provided and the page also has a link to the [Fluxx User Guide](#) that can help you navigate the system. You will need to create a new profile and once in the system, click "Start a Request for Lead Agency Oversight Application." DTSC recommends that once the SVA is signed, a Preliminary Endangerment Assessment Report (PEA Report) be submitted for DTSC review. The PEA Report shall summarize all existing data and provide an evaluation of the possible risk to current and future users of the site. If you have any questions about the application portal, please contact the DTSC Brownfield Coordinator [Gregory Shaffer](#) or contact the [Application Portal Inbox](#).
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 [June 2006 Phase I Addendum Guidance](#).
3. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within approved screening levels for the intended land use. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the

Peerapol Suree  
February 23, 2024  
Page 3

origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material meets screening levels for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use.

DTSC appreciates the opportunity to review and comment on the MND for Torrance Del Amo 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 concerns, please contact me or a member of our [CEQA Unit Team](#).

Sincerely,

A handwritten signature in black ink that reads "Dave Kereazis". The signature is written in a cursive, flowing style.

Dave Kereazis  
Associate Environmental Planner  
CEQA Unit-Permitting/HWMP  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Peerapol Suree  
February 23, 2024  
Page 4

cc: (via email)

Governor's Office of Planning and Research  
State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Scott Wiley  
Associate Governmental Program Analyst  
CEQA Unit-Permitting/HWMP  
Department of Toxic Substances Control  
[Scott.Wiley@dtsc.ca.gov](mailto:Scott.Wiley@dtsc.ca.gov)

Tamara Purvis  
Associate Environmental Planner  
CEQA Unit-Permitting/HWMP  
Department of Toxic Substances Control  
[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)

## Exhibit D

Email from Mr. Dave Kereazis, Environmental Planner,  
DTSC, California Environmental Protection  
Agency-Sacramento (5/17/24)

**jodencrantz@tri-s.com**

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**From:** Kereazis, Dave@DTSC <Dave.Kereazis@dtsc.ca.gov>  
**Sent:** Friday, May 17, 2024 10:31 AM  
**To:** jodencrantz@tri-s.com  
**Subject:** DTSC Letter  
**Attachments:** DTSC Comment Letter-Torrance Del Amo Project\_Final\_ADA.pdf

Hi-

Here is the comment letter we discussed this morning. Thanks for the conversation and hope to hear from you soon.



**Dave Kereazis**

Associate Environmental Planner  
HWMP-Permitting (CEQA Unit)  
916-255-6446

[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Department of Toxic Substances Control  
California Environmental Protection Agency

## Exhibit E

Email from Mr. Jonathan Rinella, PE, Associate Civil Engineer, Los Angeles County Public Works (5/15/24)

**jodencrantz@tri-s.com**

---

**From:** Jonathan Rinella <JRinella@dpw.lacounty.gov>  
**Sent:** Wednesday, May 15, 2024 5:36 PM  
**To:** jodencrantz@tri-s.com  
**Cc:** PW-EPD Methane Mitigation  
**Subject:** RE: 2325 Crenshaw Blvd, Torrance  
**Attachments:** Gas Hazard Mitigation Policy and Standards.pdf

Good afternoon, Joe,

It was great speaking with you this afternoon.

As discussed, attached is a copy of Los Angeles County Public Works' Gas Hazard Mitigation Policy and Standards for your reference. The document includes the Los Angeles County Building Code Title 26 Sections 110.3, 110.4, and 110.5 for gas and vapor mitigation associated with methane producing landfills, abandoned/idle/active oil and gas wells, and contaminated soil sites. All methane mitigation resources is located on our [SWIMS Website](#).

Furthermore, it appears that the subject site is in the City of Torrance. The Torrance Fire Department's Certified Unified Program Agency (CUPA), Hazardous Materials Administration is the lead for remedial action dealing with contaminated sites and oversees the closure of oil wells. Their contact phone number is (310) 618-2973. Unfortunately the website appears to be under construction, but can be found [here](#).

Please let me know if you have any questions or if I can provide further assistance.

Best,

Jonathan Rinella, PE  
Associate Civil Engineer  
Los Angeles County Public Works  
Office: (626) 458-2193  
Cell: (626) 238-2282

---

**From:** jodencrantz@tri-s.com <jodencrantz@tri-s.com>  
**Sent:** Wednesday, May 15, 2024 4:50 PM  
**To:** Jonathan Rinella <JRinella@dpw.lacounty.gov>  
**Cc:** jodencrantz@tri-s.com  
**Subject:** 2325 Crenshaw Blvd, Torrance

**CAUTION:** External Email. Proceed Responsibly.

Thank you for talking with me about the Torrance site and their dead link.

Joe Odencrantz, Ph.D., P.E.  
Principal  
Tri-S Environmental  
Newport Beach, California  
mobile (949) 698-8851  
email [jodencrantz@tri-s.com](mailto:jodencrantz@tri-s.com)

web <https://tri-s.com>

LinkedIn <https://www.linkedin.com/in/josephodencrantz/>

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