Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

June 25, 2025

Sean McPherson
Principal Planner
City of Rancho Cucamonga
10500 Civic Center Drive
Rancho Cucamonga, CA 91730
sean.mcpherson@cityofrc.us

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR NEWCASTLE ARROW ROUTE DATED MAY 21, 2025, STATE CLEARINGHOUSE NUMBER 2023110039

Dear Sean McPherson,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for Newcastle Arrow Route (Project). The proposed Project includes the demolition, site clearing, site grading preparation and the construction, operation, and maintenance of a new industrial building for warehouse distribution, office space, loading docks for truck trailers, and surface parking areas, including 149 automobile parking spaces and 44 truck trailer parking spaces. In total, the proposed Project would introduce approximately 334,776 gross square feet of new building floor area (7.7 acres) on 644,688 square feet of lot area (14.8 acres).

There are several areas wherein DTSC has regulatory oversight near or within the proposed Project site, whether they are listed as having documented contamination, land use restrictions, mining operations, 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. Specifically the DP Etiwanda

and BTC III Arrow Route CC LP sites which are located within close vicinity to the proposed Project.

DP Etiwanda (site): A Preliminary Endangerment Assessment (PEA) Report was submitted to DTSC (Ramboll, February 2020) that included a summary of excavation activities and confirmation sampling conducted at the site. Residual concentrations of metals and Polychlorinated biphenyls (PCBs) left in place were below their established commercial / industrial screening levels, except for a few locations along the northern, western, and southern property lines. Clean imported soil was used to backfill the site. The PEA Report included a human health risk assessment (HHRA) for an evaluation of on-site concentrations of contaminants left in place. The HHRA evaluation confirmed that residual concentrations were below appropriate risk thresholds under a commercial/industrial land use scenario. DTSC approved the PEA Report on August 5, 2020, and concluded the site was acceptable for its intended use provided a Land Use Covenant (LUC) was executed between DP Etiwanda, LLC and DTSC, restricting the property to commercial/industrial land use. A LUC between DP Etiwanda, LLC and DTSC was executed on August 19, 2020, and recorded with the San Bernardino County Recorder's Office on October 22, 2020.

A subsequent limited site investigation was conducted at previously identified areas along the property boundary to determine extent of lead and/or PCBs contamination in shallow soil. Results of the limited investigation were summarized in the Limited Supplemental Site Investigation Report to Delineate Residual Soil Impact along the Property Boundary (Ramboll, September 2020). Based on the limited investigation findings, residual concentrations of lead along the southern and northwest boundary were localized and slightly above the commercial/industrial screening levels. PCBs detected in one area along the western boundary were within a risk management range and deemed acceptable for the site's commercial/industrial use. No additional investigation or cleanup is required at the site for its current intended use.

BTC III Arrow Route CC LP has undergone multiple investigations for metals, PCBs, and VOCs. DTSC is in the review process for a Removal Action Plan, to address metals and implement land use restrictions to commercial/industrial use.

Section 3.8-2, Environmental Impacts and Mitigation Measures states: "The project site is listed as a hazardous materials site pursuant to Government Code Section 65962.5. The project site is listed on several databases that track potential and documented contamination, as discussed in the Phase I ESA prepared for the site. Previous cleanup activities discussed in the Phase I ESA have remediated the contamination onsite to acceptable regulatory screening levels. However, the project site includes residual contamination from past clean up and remediation activities and elevated concentration of contaminants associated with past industrial uses. This impact is considered potentially significant. However, implementation of Mitigation Measures 3.8-1 would require the preparation and implementation of a Soil Management Plan as part of the surficial remediation of the site prior to start of construction, which would minimize the potential to create a significant hazard to the public or environment."

DTSC recommends and requests consideration of the following comments:

1. Due to the Project's proximity to well documented contaminated areas,(DP Etiwanda and BTC III Arrow Route CC LP), investigation and/or cleanup should be conducted in accordance with all relevant and appropriate laws, regulations, and guidelines with the oversight of the appropriate regulatory agencies therefore, DTSC recommends the City of Rancho Cucamonga address contamination found to be present within the Project area through oversight from a self-certified local agency, DTSC or Regional Water Quality Control Board. If entering one of DTSC's voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: Request for Agency Oversight Application. Submittal of the online application includes an agreement to pay costs incurred during agreement

preparation. If you have any questions about the application portal, please contact the relevant Regional Brownfield Coordinator for your Project.

2. All imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment (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 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 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.

3. 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.

DTSC would like to thank you for the opportunity to comment on the DEIR for Newcastle Arrow Route. 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,



Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
state.clearinghouse@lci.ca.gov

Marlie Long
Environmental Consultant
Ascent Environmental
marlie.long@ascent.inc

Courtney Wing
Development Manager / Project Applicant
Newcastle Partners
courtney@newcastlepartners.com

Johnson Abraham
Project Manager / Environmental Scientist
SMRP – Cleanup – Cypress
Department of Toxic Substances Control
Johnson.Abraham@dtsc.ca.gov

Shawna Couplin
Environmental Scientist
SMRP – Cleanup – Chatsworth
Department of Toxic Substances Control
Shawna.Couplin@dtsc.ca.gov

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov