



FINAL ENVIRONMENTAL IMPACT REPORT

Newcastle Arrow Route Project

SCH No. 2023110039

Prepared for:



City of Rancho Cucamonga
Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

August 2025

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LIST OF ABBREVIATIONS

ACM	asbestos-containing materials
ACWM	asbestos-containing waste materials
APN	Assessor's Parcel Number
ATCM	Airborne Toxic Control Measure
CARB	California Air Resources Board
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
City	City of Rancho Cucamonga
CUP	conditional use permit
DEIR	Draft Environmental Impact Report
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EPA	U.S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act of 1986
Final EIR	Final Environmental Impact Report
g/L	grams per liter
GHG	greenhouse gas
HERO	Human and Ecological Risk Office
HHRA	human health risk assessment
HRA	Health Risk Assessment
LBP	lead-based paint
LUC	Land Use Covenant
LUST	leaking underground storage tank
NOA	Notice of Availability
NOx	nitrogen oxides
PCB	polychlorinated biphenyl
PEA	Preliminary Endangerment Assessment
PID	photo ionization detector
PM	particulate matter
ppm	parts per million
Project	Newcastle Arrow Route Project
RWQCB	regional water quality control board
SCAQMD	South Coast Air Quality Management District
SoCalGas	Southern California Gas Company
SPCC	Spill Prevention, Control, and Countermeasure
sq ft	square feet
TPH	total petroleum hydrocarbons
USC	US Code
UST	underground storage tanks
VOC	volatile organic compound
WAIRE	Warehouse Actions and Investments to Reduce Emissions

1 INTRODUCTION

This Final Environmental Impact Report (Final EIR) has been prepared by the City of Rancho Cucamonga (City), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (California Code of Regulations [CCR] Section 15132) for the Newcastle Arrow Route Project (proposed project) (City of Rancho Cucamonga 2025; State Clearinghouse No. 2023110039). The Final EIR consists of the Draft Environmental Impact Report (EIR) and this document, which includes comments received on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the proposed project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR, including project updates, made in response to these comments and as a result of the applicant's ongoing planning and design efforts. The Final EIR will be used to support the City's decision regarding whether to approve the proposed project.

This Final EIR will also be used by CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the proposed project or that have jurisdiction over portions of the proposed project.

1.2 PROJECT LOCATION

The project site is located at 12459 Arrow Route in the city of Rancho Cucamonga. The project site is located on Assessor's Parcel Number (APN) 0229-131-24 and includes approximately 644,688 square feet (sq ft) of lot area (14.8 acres). The project site is generally flag-shaped and is elongated in an east to west direction with topography descending slightly from a north to south direction on the order of a few feet. The project site is bound by existing industrial developments to the north and south, Juneberry Drive/Yellowwood Road to the west, and an existing drainage basin and industrial development to the east.

1.3 PROJECT OBJECTIVES

The project applicant has developed the following objectives for the proposed project:

- ▶ Develop an underutilized site that implements the General Plan's vision for a modernized industrial employment district in the Southeast Industrial Area.
- ▶ Remove hazardous materials from the project site to enable industrial and commercial development compatible with human health standards.
- ▶ Locate near compatible land uses and businesses and avoid conflicts with residential and other sensitive land uses.
- ▶ Develop in proximity to available infrastructure, such as designated truck routes, the State highway system, and utilities, with connections to the Southern California supply chain and goods movement network.
- ▶ Provide a complete network of streets and access routes to increase access and improve public safety in the Southeast Industrial Area.

- ▶ Increase the number and quality of employment opportunities in the city to reduce the need for members of the local workforce to commute outside the area for employment and improve the jobs-to-housing balance.
- ▶ Maximize the rate of economic activity per acre of land to increase the City's tax base and increase overall economic development in the city.

1.4 SUMMARY DESCRIPTION OF THE PROJECT

The proposed project involves demolition of the existing buildings and surface parking lot and the construction, operation, and maintenance of one concrete tilt-up industrial warehouse building (Type III-B construction) totaling approximately 334,776 gross sq ft of building floor area comprised of 322,776 sq ft of warehouse space, 6,000 sq ft of ground floor office space, and 6,000 sq ft of mezzanine office space. The total footprint of the proposed building would be 328,776 sq ft. In total, the 14.8-acre project site would be developed with approximately 12.7 acres of impervious surface, which results in 86 percent impervious coverage. Approximately 2.1 acres of the project site (approximately 14 percent) would be developed with landscaping and other pervious surface area.

The building would be supported by a slab-on-grade foundation and would include 44 loading dock doors. The proposed project would meet the parking requirements of the Rancho Cucamonga Municipal Code (Chapter 17.64, Parking and Loading Standards; 17.64.100 D.1, Trailer Parking Required) by providing 149 automobile parking stalls and 44 truck trailer parking stalls. Of the total automobile parking stalls, 19 stalls would be EV Capable, and 6 stalls would be EV Ready (as defined by the California Green Building Standards Code). In addition, one of the truck trailer parking stalls would meet EV Capable requirements. The project site would be surrounded by security fencing with two gated access points at the northeast and northwest corners of the property. The proposed project would also include the creation of a new internal vehicle circulation system, exterior lighting and signage, and landscape areas.

Construction of the proposed project would occur over approximately 12 months anticipated to begin in March 2026 and end in March 2027. Construction activities associated with the proposed project would occur in the following stages: demolition and site clearing, grading and excavation, building construction and infrastructure improvements, architectural coatings, and paving. No pile driving would be performed. Construction activities would be anticipated to occur between 6:00 a.m. and 6:00 p.m., Monday through Friday. Grading would be balanced onsite and would involve approximately 25,000 cubic yards of cut and 25,000 cubic yards of fill. Up to 14.3 acres of the proposed project site could be disturbed on a daily basis during construction. Approximately 165 tons of debris would be exported off-site during construction of the proposed project. The proposed project would involve grading and excavating site soils to depths up to 5 feet below existing grade.

The type of tenant that would occupy the proposed building and the resulting business activities that would be conducted are not known at this time. For the purpose of evaluating the proposed project's environmental effects in the EIR, the proposed building is assumed to be used as a warehouse distribution facility (i.e., general warehouse occupancy). The proposed project assumes that cold storage would not be included. It is assumed that operations could occur on a 24-hour, 7-day-per-week, basis. Proposed project operations are anticipated to commence in 2027. Based on industry average, the proposed project is anticipated to accommodate approximately 258 employees daily.

The proposed project requires the approval of its design review application, conditional use permit (CUP), and Master Plan application from the City.

1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft EIR identified potentially significant impacts associated with air quality; archaeological, historical, and tribal cultural resources; energy; greenhouse gas (GHG) emissions; hazards and hazardous materials; and transportation. However, the Draft EIR concluded that all potentially significant impacts identified for the proposed project would be mitigated to less than significant levels with the incorporation of mitigation measures, and none of the impacts would be significant and unavoidable. Refer to Appendix B, "Mitigation Monitoring and Reporting Program (MMRP)," for a detailed description of the applicable mitigation measures for the proposed project.

1.6 CEQA PUBLIC REVIEW PROCESS

On May 23, 2025, the City released the Draft EIR for a 45-day public review and comment period. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies and posted on the CEQAnet Web Portal. The Draft EIR was also posted on the City's website and was made available at the City Clerk's Office, the City Planning Department Public Counter, Archibald Library, and Paul A. Biane Library. The City published a Notice of Availability (NOA) of the Draft EIR in the **Inland Valley Daily Bulletin** and distributed the notice to a project-specific mailing list.

As a result of these notification efforts, written comments were received from the Department of Toxic Substances Control (DTSC), South Coast Air Quality Management District (SCAQMD), and Southern California Gas Company (SoCalGas) on the content of the Draft EIR. Chapter 3, "Responses to Comments," identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (State CEQA Guidelines CCR Section 15088.5). In other words, no new significant impacts or other conditions set forth in Section 15088.5(a) of the State CEQA Guidelines were identified.

1.7 ORGANIZATION OF THE FINAL EIR

This Final EIR is organized as follows:

Chapter 1, "Introduction," describes the purpose of this Final EIR, summarizes the proposed project and the major conclusions of the Draft EIR, provides an overview of the CEQA public review process, and describes the content of this Final EIR.

Chapter 2, "Responses to Comments," contains a list of all parties that submitted comments on the Draft EIR during the public review period, the comments received, and responses to the comments.

Chapter 3, "Revisions to the Draft EIR," presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by strikeouts (~~strikeouts~~) where text is removed and by underline (underline) where text is added.

Chapter 4, "References," identifies the documents used as sources for the analysis.

Chapter 5, "List of Preparers," identifies the lead agency contacts, as well as the preparers of this Final EIR.

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2 RESPONSES TO COMMENTS

This chapter identifies the commenters and contains the comment letters received during the public review period for the Draft EIR, which concluded on July 8, 2025. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses are provided to comments on environmental issues received from reviewers of the Draft EIR.

2.1 LIST OF COMMENTERS ON THE DRAFT EIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter. The comment letters are presented in the order in which the letters were received. All comment letters are contained in Appendix A, "Comment Letters," of this Final EIR.

Table 2-1 List of Commenters

Letter No.	Commenter	Date
1	Southern California Gas Company	June 3, 2025
2	Department of Toxic Substances Control	June 25, 2025
3	South Coast Air Quality Management District	July 2, 2025

2.2 COMMENTS AND RESPONSES

The comment letters are provided below. Where a comment letter contains multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter. The individual comments are reproduced in their entirety in this section, and each comment is followed by a response. Some of the written comments describe regulatory processes and requirements related to the project and do not address environmental issues or the adequacy of the EIR. All comment letters will be forwarded to the City of Rancho Cucamonga Planning Commission for consideration via this Final EIR. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues raised in comments on the EIR.

Letter 1 Southern California Gas Company

Will Liao, Region Planning Supervisor

June 3, 2025

Comment 1-1

My name is Will Liao. I am the Inland Region Planning Supervisor for SoCalGas.

I received a letter from the City of Rancho Cucamonga regarding the Newcastle Arrow Route Project at 12459 Arrow Route, APN 0229-131-24.

SoCalGas has High-Pressure and Transmission facilities in and near the project site. Please help us ensure everyone's safety by requiring the developer to contact 811/USA prior to any excavation and/or demolition activities so we can get out to Locate & Mark out our facilities. Excavations within 10 ft of our High-Pressure facilities will require a SoCalGas High-Pressure Standby on site.

Please have developer send us designs/plans as soon as practicable for us to review for potential conflicts with our facilities. Alterations/Relocations of High-Pressure facilities can take around 9 to 12 months to plan and execute, and longer for Transmission facilities. The sooner we have 95%+ plans for reviews, the better the chance for a successful outcome.

Response 1-1

The comment describes notification and coordination requirements for project activities with potential to result in utility conflicts. The project applicant will be required to submit relevant information and coordinate with existing utility service providers to identify any potential utility line conflicts during the City's design and review process. Prior to project-related excavation and demolition activities, the project applicant will comply with all notification requirements related to the identification of underground utilities in accordance with State law. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Comment 1-2

If the developer will need new gas services, please have them contact our Builder Services group to begin the application process as soon as practicable, at: Builder Services | SoCalGas

Response 1-2

The comment provides direction regarding requesting new gas services. As described in Section 2.5.5, "Utility Infrastructure," on page 2-22 of the Draft EIR, the proposed project would not include any natural gas hook-ups or piping. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Letter 2 Department of Toxic Substances Control

Tamara Purvis, Associate Environmental Planner

June 25, 2025

Comment 2-1

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).

Response 2-1

The comment provides introductory remarks and a project summary. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Comment 2-2

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.

Response 2-2

The comment identifies contaminated sites with DTSC regulatory oversight in the vicinity of the project site (specifically, DP Etiwanda and BTC III Arrow Route CC LP, which are not part of the proposed project). This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Comment 2-3

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."

Response 2-3

The comment summarizes the project impact and mitigation measure related to hazardous materials sites pursuant to Government Code Section 65962.5. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Comment 2-4

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.

Response 2-4

The comment recommends that cleanup at the project site be conducted in accordance with appropriate laws, regulations, and guidelines with oversight from the appropriate regulatory agency because of the project's proximity to contaminated areas (specifically, DP Etiwanda and BTC III Arrow Route CC LP). Pages 3.8-6 and 3.8-7 of the Draft EIR identify recognized environmental conditions associated with the project site and bordering properties, which are based on the findings of a Phase I Environmental Site Assessment prepared for the project (Appendix F of the Draft EIR). As discussed under Impact 3.8-2 on pages 3.8-11 and 3.8-12 of the Draft EIR, residual contamination was identified at the project site, which includes contamination from current and historical uses of the project site and any contamination that may have reached the project site through down- or cross-gradient flows from nearby properties. Mitigation Measure 3.8-1 requires development and implementation of a Soil Management Plan, which would ensure the project site is properly remediated and all present hazardous and impacted soils are disposed of prior to the start of construction of the project. This mitigation would address all contamination at the project site, including any contaminants that may have reached the project site from the DP Etiwanda and BTC III Arrow Route CC LP sites.

As stated on page 3.8-12 of the Draft EIR, the San Bernardino County Environmental Health Division, which serves as the Certified Unified Program Agency for the City of Rancho Cucamonga, would be responsible for reviewing and approving the Soil Management Plan. The San Bernardino County Environmental Health Division would also be responsible for enforcing implementation of the Soil Management Plan in accordance with applicable laws, regulations, and guidance. As discussed under Cumulative Impact 4.3.8-2 on pages 4-18 and 4-19, cumulative projects that are proposed on nearby hazardous materials sites, including DP Etiwanda and BTC III Arrow Route CC LP, would also be required to comply with all federal, state, and local laws and regulations related to soil and hazardous materials remediation. No revisions to the Draft EIR are necessary in response to this comment.

Comment 2-5

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.

Response 2-5

The comment recommends compliance with DTSC's procedures for minimizing the introduction of contaminated soils to sites that require imported fill materials. As stated on page 2-23 of the Draft EIR, grading would involve approximately 25,000 cubic yards of cut and 25,000 cubic yards of fill. Cut and fill would primarily be balanced onsite; however, the use of imported fill may be necessary to replace contaminated soils that are removed from the site. Mitigation Measure 3.8-1 on page 3.8-12 of the Draft EIR has been revised to include requirements for selecting and testing imported fill materials.

Comment 2-6

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.

Response 2-6

The comment recommends compliance with regulations and policies related to the removal, demolition, and disposal of buildings and structures with potential to contain hazardous materials (e.g., lead-based paints [LBP] or products, mercury, asbestos-containing materials [ACM], and polychlorinated biphenyl [PCB] caulk). The project would require demolition of existing buildings, which have potential to contain these hazardous materials due to the building's age. The project applicant would be required to comply with federal, state, and local laws and regulations related to the removal and disposal of any known or yet-unknown hazardous building materials encountered during construction, and regulations pertaining to worker safety. Applicable regulations that govern the removal of hazardous building materials include the Toxic Substances Control Act and Occupational Safety and Health Standards, described on pages 3.8-1 and 3.8-2 in Section 3.8.1, "Regulatory Setting," of the Draft EIR. Pages 3.8-1, 3.8-2, and 3.8-4 in Section 3.8.1, "Regulatory Setting," of the Draft EIR have been revised to describe additional regulations that govern the release of hazardous building materials. Impact 3.8-1 on pages 3.8-10 and 3.8-11 of the Draft EIR have been revised to discuss how compliance with existing laws and regulations would reduce impacts associated with the release of hazardous building materials during demolition of the existing buildings. Pages 3.8-11 and 3.8-12 of the Draft EIR address soil contamination at the project site, which may include contamination resulting from hazardous building materials. As discussed on page 3.8-12 of the Draft EIR, Mitigation Measure 3.8-1 requires development and implementation of a Soil Management Plan, which would include testing of onsite soils in the vicinity of the existing buildings, to ensure the project site is properly remediated and all present hazardous and impacted soils are disposed of prior to the start of construction of the project.

Comment 2-7

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.

Response 2-7

The comment provides closing remarks. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Letter 3 South Coast Air Quality Management District

Sam Wang, Program Supervisor

July 2, 2025

Comment 3-1

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Rancho Cucamonga is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of: 1) demolishing two non-operational and unoccupied industrial buildings that are approximately 157,221 square feet and 20,000 square feet, respectively, and a 100-space surface parking lot; and 2) constructing, operating, and maintaining one concrete tilt-up industrial warehouse building with approximately 334,776 gross square feet of floor area on 14.8 acres.¹ The Proposed Project is located at 12459 Arrow Route in Rancho Cucamonga.² Based on a review of aerial photographs, the nearest sensitive receptor (e.g., residential development) appears to be located 0.3 mile northeast of the project site.³ Construction of the Proposed Project is scheduled to occur over a 12-month period from March 2026 to March 2027.⁴

1 Draft EIR, p. 14.

2 Ibid, p.13.

3 Ibid, p. 46.

4 Ibid, p. 59.

Response 3-1

The comment provides introductory remarks and a project summary. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Comment 3-2

South Coast AQMD Comments

Potential Underestimation of Health Risk Impacts From On-Site Heavy-Duty Trucks Based on the Draft EIR, the air quality modeling analysis assumed that all 44 loading docks will be utilized, with each truck idling for 15 minutes at the dock and traveling at five miles per hour (mph) on-site.⁵ The Draft EIR, however, does not provide any evidence or explanation to support these assumptions. While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NOx idle emission standard which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as “clean idle” certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.⁶ Furthermore, CARB’s EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.⁷ As a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the Health Risk Assessment (HRA) may have substantially underestimated the full extent of operational health risks associated with the diesel particulate matter (DPM) emissions from the anticipated onsite heavy-duty truck activities.

To ensure a more accurate health risk evaluation, the HRA should be updated to reflect truck idling durations that are consistent with regulatory allowances and realistic operational patterns expected for the Proposed Project.

5 Draft EIR, p. 94.

6 CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf

7 CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

Response 3-2

This comment states that the HRA may be underrepresenting the DPM emissions and risk by limiting trucks to 15 minutes of idling at a dock and traveling at 5 mph onsite. The assumptions for truck idling and truck travel on-site are based on information provided in a recent comment letter submitted by SCAQMD on a separate project, the Draft EIR for the Proposed Perris Ethanac Travel Center Project (SCH No. 2024010850). In that comment letter, SCAQMD stated that it is reasonable to assume a truck may be left running for at least 15 minutes. While the City acknowledges that the ATCM provides an exemption from the requirement to limit idling to five minutes, Mitigation Measure 3.7-4, "Idling Limits During Operations," would ensure that all medium- and heavy-duty trucks that visit the project site limit their idling by shutting down engines when not in use, and limiting idling to a maximum idling time of less than 3 minutes at any given location and a total of 15 minutes total within the project site for each truck visit. Therefore, this assumption is reasonable and enforceable and the HRA does not underestimate the health risks. No updates are required to address this comment.

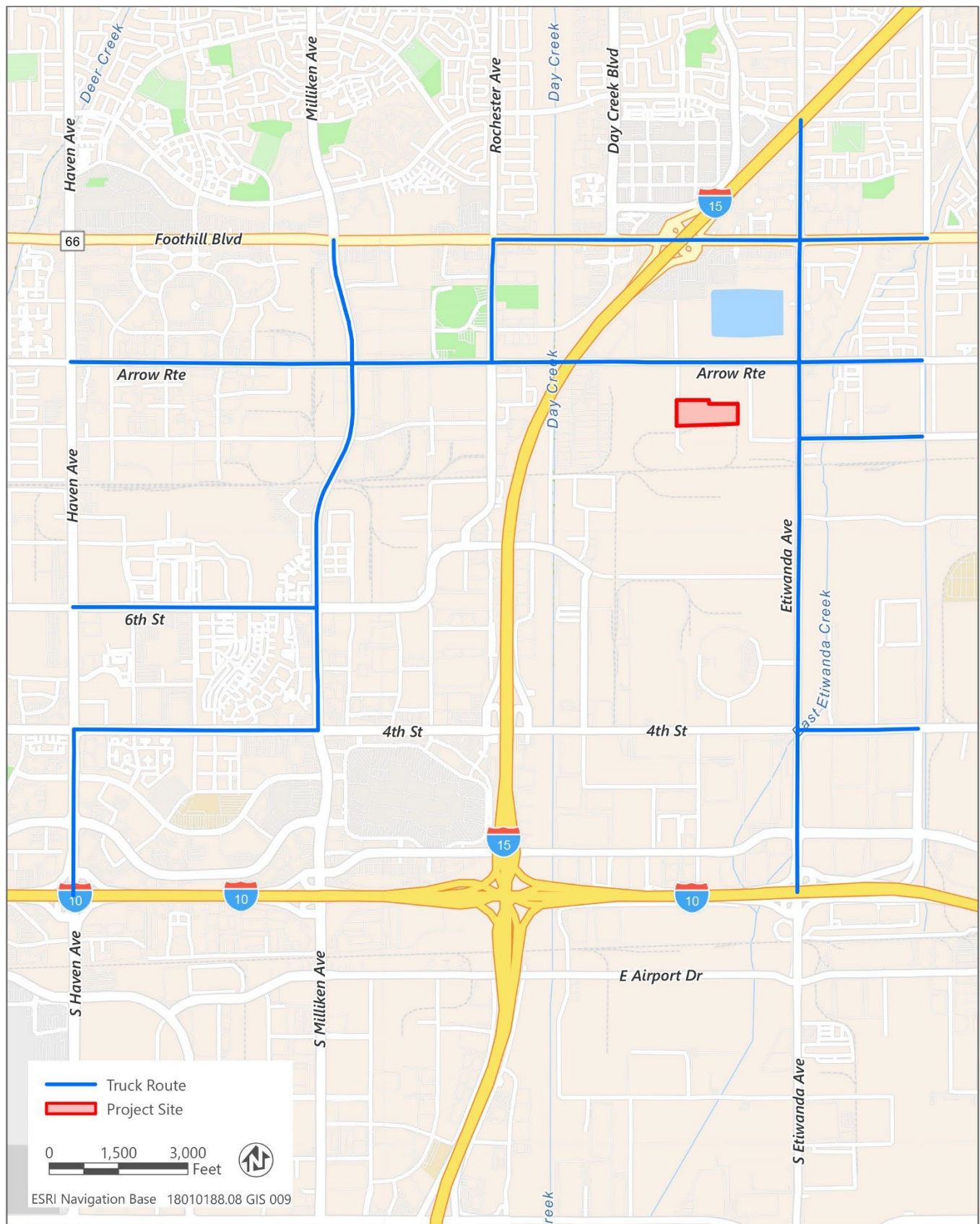
Comment 3-3

Missing Off-Site Truck Route in AERMOD Modeling Analysis

Accurate representation of the off-site truck routes is essential for accurately modeling and assessing air quality and health risk impacts from diesel truck emissions using AERMOD, as well as for evaluating potential exposure to sensitive receptors. Review of the AERMOD modeling files indicate that the off-site truck route connecting the Proposed Project site to the nearest freeway or major roadway was not clearly identified or included in the modeling input file. The Lead Agency is recommended to revise the AERMOD modeling analysis to clearly depict the entire off-site truck route network, including the segment linking the Proposed Project site to the nearest freeway. For consistency throughout the EIR, the Lead Agency is recommended to update the project description, HRA assumptions, and the traffic study documentation accordingly.

Response 3-3

The comment states that the AERMOD modeling does not include all the off-site truck routes connecting the project site to nearby freeways and that roadway links were not clearly identified in the AERMOD runs. The truck routes that were modeled are based on the roadway links identified in Figure 5, "Project Trip Assignment," in the Non-CEQA Transportation Study provided as Appendix J of the Draft EIR (Fehr & Peers 2024). The truck routes modeled start at the project site and extend to the I-10 eastbound and westbound on-ramps via Etiwanda Avenue and Millikan Avenue, the I-15 northbound and southbound on-ramps via W. Foothill Boulevard and 4th Street, and along the various surface streets identified in Non-CEQA Transportation Study. These truck routes were modeled in AERMOD to ensure that emissions that occur on local roadways between the project site and the nearest freeway access points are accounted for. For informational purposes, Figure 2.2-1 has been included in this Final EIR to show the truck routes assumed in the AERMOD modeling, which originate at the project site and extend to the identified nearby freeway ramps. Therefore, off-site truck routes connecting the proposed project to the nearest freeway were adequately modeled in AERMOD. No changes are required to the Draft EIR in response to this comment.



Source: Adapted by Ascent in 2025..

Figure 2.2-1 Off-Site Truck Routes Modeled in AERMOD

Comment 3-4*Lack of Commitment to Require Ultra-Low VOC Coatings per Mitigation Measure 3.2-1*

Based on the Draft EIR, the estimates of volatile organic compound (VOC) emissions from the use of architectural coatings during construction assume that all coatings used for the Proposed Project will have a VOC content of less than 10 grams per liter (g/L), resulting in total VOC emissions less than the South Coast AQMD air quality significance threshold.⁸ However, this assumption appears to rely on Mitigation Measure 3.2-1: Construction Low VOC Coatings, which requires the use of ultra-low VOC architectural coatings (≤ 10 g/L) during all phases of construction. However, the Draft EIR does not provide sufficient information demonstrating that this mitigation measure is feasible, supported by evidence, or enforceable. Specifically, South Coast AQMD Rule 1113 – Architectural Coatings allows for a wide range of VOC limits depending on the coating type, and products with a VOC content of 10 g/L or less may not be commercially available or technically appropriate for all applications required during construction of the Proposed Project.

To support the conclusion that VOC emissions will be less than the air quality significance threshold after mitigation is applied, the Lead Agency should revise the EIR to ensure the Mitigation Measure 3.2-1 is feasible in practice, not just in modeling assumptions by:

- ▶ Clearly explaining how Mitigation Measure 3.2-1 will be implemented and enforced; and
- ▶ Providing evidence of availability of all intended architectural coatings products with a VOC content of less than 10 g/L, such as Safety Data Sheets, and suitability for the proposed construction activities.

8 Draft EIR, p. 102.

Response 3-4

This comment states that Mitigation Measure 3.2-1 may not be feasible and suggests that the Draft EIR explain how the mitigation measure will be implemented and enforced, and provide evidence of availability of intended architectural coatings with a VOC content of less than 10 g/L and suitability for the proposed project. As stated on page 3.2-28 of the Draft EIR, Mitigation Measure 3.2-1 requires the contract to use low-VOC coatings with a VOC content of 10 g/L or less during all phases of construction. To enforce this measure, the project applicant is required to submit a list of coatings to be used, their respective VOC content, and a summary of the surface area to be painted to the City prior to issuance of grading permits. The mitigation measure also requires that the City verify compliance and enforce compliance through the contractual lease agreement. Thus, the Draft EIR provides an explanation of how the mitigation measure will be implemented and enforced, and restricts architectural coatings that do not have a VOC content of less than 10 g/L. Therefore, no revisions to the Draft EIR are required in response to this comment.

Comment 3-5*Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program*

Since the Proposed Project consists of the development of a 334,776 square foot warehouse, once the warehouse is occupied, the Proposed Project's warehouse owners and operators will be required to comply with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program and Rule 316 – Fees for Rule 2305. Rule 2305 and Rule 316 aim to reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM so as to reduce adverse public health impacts on communities located near warehouses. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn WAIRE Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Therefore, the Lead

Agency is recommended to review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements, design features/enhancements, and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. For questions concerning Rule 2305 implementation and compliance, please call (909) 396-3140 or email waire-program@aqmd.gov. For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.

Response 3-5

This comment states that the proposed project would be required to comply with SCAQMD Rules 2305 and 316. The comment also recommends that the proposed project consider the potential for mitigation through WAIRE Point Compliance Obligation for future operators and explore whether to the proposed project would implement this to help future warehouse operators meet their compliance obligations. The air quality mitigation measures included in the Draft EIR were developed based on the WAIRE Program, which includes compliance with SCAQMD Rules 2305 and 316. In addition, the City and applicant acknowledge that the proposed project's future tenants will be required to comply with SCAQMD Rule 2305, Warehouse Indirect Source Rule, WAIRE Program, and Rule 316, Fees for Rule 2305. No additional analysis or changes to the Draft EIR are required in response to this comment.

Comment 3-6

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,⁹ Rule 203 – Permit to Operate,¹⁰ Rule 401 – Visible Emissions,¹¹ Rule 402 – Nuisance,¹² Rule 403 – Fugitive Dust,¹³ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁴ Rule 1113 – Architectural Coatings,¹⁵ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹⁶ Rule 1179 – Publicly Owned Treatment Works Operations,¹⁷ Regulation XIII – New Source Review,¹⁸ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁹ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²⁰ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²¹ etc. It is important to note if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guidelines Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the Final EIR should include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

9 South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

10 South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

11 South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

12 South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

13 South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

14 South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

15 South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

16 South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

17 South Coast AQMD, Rule 1179 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

18 South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

19 South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

20 South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

21 South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

Response 3-6

This comment explains the potential new stationary and portable sources the Proposed Project may include and the required permits associated with those sources. The comment also explains SCAQMD's role as a responsible agency and states that the Final EIR should include a discussion about any and all new stationary and portable equipment requiring SCAQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify SCAQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). The comment also provides contact information for SCAQMD's Engineering and Permitting staff. At this time, the proposed project is not expected to require the use of new stationary and portable sources that would be subject to permitting from the SCAQMD. However, the future tenant has not yet been identified, and there is a possibility that a currently unknown future tenant could require a permit from SCAQMD, in which case the SCAQMD could serve as a responsible agency under CEQA. Therefore, the SCAQMD has been identified as a potential responsible agency, and revisions to the Draft EIR have been made as shown in Chapter 3 of this Final EIR. In such a case, the SCAQMD would be able to certify the EIR as a responsible agency pursuant to CEQA Guidelines Section 15096 for any discretionary CEQA actions, and/or prepare a Supplemental, Subsequent, or Addendum to the EIR, as determined necessary to address the specific approvals. Page 2-24 in Section 2.6, "Potential Permits and Approvals Required," of the Draft EIR have been revised to identify SCAQMD as a potential Responsible Agency.

Comment 3-7

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Response 3-7

The comment describes the requirements for addressing comments from public agencies set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b). This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

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3 REVISIONS TO THE DRAFT EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strike through~~, and text additions are shown in underline.

The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

3.1 REVISIONS TO CHAPTER 2, “PROJECT DESCRIPTION”

In response to comments on the Draft EIR, the following text on page 2-24 of the Draft EIR is revised as follows to describe the potential for SCAQMD to serve as a Responsible Agency:

2.6 POTENTIAL PERMITS AND APPROVALS REQUIRED

2.6.1 City of Rancho Cucamonga

The following permits and approvals from the City of Rancho Cucamonga are required for the proposed project and are addressed within this Draft EIR accordingly:

- ▶ Approval of design review application;
- ▶ Approval of conditional use permit (CUP) application; and
- ▶ Approval of Master Plan application.

2.6.2 Other Agencies

Other agencies may require permits for the project to operate and could serve as a “Responsible Agency” under CEQA. A Responsible Agency is a public agency other than the Lead Agency that has discretionary approval power over the project and proposes to carry out or approve a project for which a Lead Agency is preparing or has prepared an EIR (CEQA Guidelines Section 15381). A Responsible Agency complies with CEQA by considering the EIR prepared by the Lead Agency and by reaching its own conclusions on whether and how to approve the project involved (CEQA Guidelines Section 15096).

The South Coast Air Quality Management District (SCAQMD) could serve as a Responsible Agency if implementation of the proposed project would include the use of new stationary and portable sources that may require one or more air permits from SCAQMD. The proposed project does not currently include operations that are anticipated to require a permit from SCAQMD. However, should a future unknown tenant require an air quality permit from the SCAQMD, the SCAQMD could certify the EIR as a Responsible Agency prior to taking a discretionary action on the issuance of a permit in accordance with CEQA Guidelines Section 15096.

3.2 REVISIONS TO CHAPTER 3.8, “HAZARDS AND HAZARDOUS MATERIALS”

In response to comments on the Draft EIR, the following text on page 3.8-1 of the Draft EIR is revised as follows to describe federal regulations that govern the release of hazardous air pollutants:

FEDERAL

Management of Hazardous Materials

Various federal laws address the proper handling, use, storage, and disposal of hazardous materials, as well as requiring measures to prevent or mitigate injury to health or the environment if such materials are accidentally released. The U.S. Environmental Protection Agency (EPA) is the agency primarily responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are primarily contained in Code of Federal Regulations (CFR) Titles 29, 40, and 49. Hazardous materials, as defined in the Code, are listed in 49 CFR 172.101. Management of hazardous materials is governed by the following laws.

- ▶ The Toxic Substances Control Act of 1976 (15 U.S. Code [USC] Section 2601 et seq.) regulates the manufacturing, inventory, and disposition of industrial chemicals, including hazardous materials. Section 403 of the Toxic Substances Control Act establishes standards for lead-based paint (LBP) hazards in paint, dust, and soil.
- ▶ The Resource Conservation and Recovery Act of 1976 (42 USC 6901 et seq.) is the law under which EPA regulates hazardous waste from the time the waste is generated until its final disposal (“cradle to grave”).
- ▶ The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (also called the Superfund Act or CERCLA) (42 USC 9601 et seq.) gives EPA authority to seek out parties responsible for releases of hazardous substances and ensure their cooperation in site remediation.
- ▶ The Superfund Amendments and Reauthorization Act of 1986 (Public Law 99-499; USC Title 42, Chapter 116), also known as SARA Title III or the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), imposes hazardous materials planning requirements to help protect local communities in the event of accidental release.
- ▶ The Spill Prevention, Control, and Countermeasure (SPCC) rule includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement SPCC Plans. The SPCC rule is part of the Oil Pollution Prevention regulation, which also includes the Facility Response Plan rule.
- ▶ The National Emission Standards for Hazardous Air Pollutants are stationary source standards for hazardous air pollutants (i.e., pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects). The National Emission Standard for Asbestos (40 CFR Part 61, Subpart M) contains specific work practices to control the release of asbestos, including during demolition of industrial buildings.

In response to comments on the Draft EIR, the following text on page 3.8-2 of the Draft EIR is revised as follows to describe DTSC’s hazardous waste regulations:

The California Department of Toxic Substances Control (DTSC), a division of the California Environmental Protection Agency, has primary regulatory responsibility over hazardous materials in California, working in conjunction with EPA to enforce and implement hazardous materials laws and regulations. DTSC’s hazardous waste regulations are contained in Title 22, Division 4.5, “Environmental Health Standards for the Management of Hazardous Waste,” in the California Code of Regulations (CCR). These regulations include requirements for site remediation and standards applicable to the generation, transport, storage, and disposal of hazardous waste. As required by Section 65962.5 of the California Government Code, DTSC maintains a hazardous waste and substances site list for the State, known as the Cortese List. The Santa Ana regional water quality control boards (RWQCBs) is the agency responsible for identifying, monitoring, and cleaning up leaking underground storage tanks (LUSTs) in the project area.

In response to comments on the Draft EIR, the following text on page 3.8-4 of the Draft EIR is revised as follows to describe local regulations that limit asbestos emissions:

South Coast Air Quality Management District Rules ~~1166~~

Rule 1166

The South Coast Air Quality Management District (SCAQMD) regulates the emission of vapors from contaminated soils, transfer facilities, accidental spillage or other deposition of contaminants. Any party who wishes to excavate or treat soils that are contaminated with total petroleum hydrocarbons (TPH) and/or solvents must obtain the appropriate permit before beginning the field work. Please see Section 3.2, "Air Quality," of this Draft EIR for a detailed discussion of applicable SCAQMD regulations.

The excavation or grading of soil at a site containing volatile organic compounds (VOCs) material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs is subject to SCAQMD Rule 1166 and would require a mitigation plan (1166 Permit). Such a plan would require segregation of the soil during excavation based on the soil analytical data, and field vapor readings generated by a properly calibrated photo ionization detector (PID) conducted during excavation, compliance with SCAQMD VOC emissions mitigation requirements, and soil management and health and safety plans to ensure worker health and safety. Soil that shows vapors exceeding 50 parts per million (ppm) on the PID will need to be properly disposed of or treated off-site, as required by Rule 1166.

Rule 1403

SCAQMD Rule 1403 includes work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing material (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

In response to comments on the Draft EIR, the following text on page 3.8-7 of the Draft EIR is revised as follows to describe potential hazardous materials associated with the existing buildings on the project site:

Site Reconnaissance

During site reconnaissance, the former Wire Mill building and the adjacent EVG building are observed, and the eastern portion of the project site is vacant. Most of the electrical equipment is removed from both buildings. A former filtration area, two pad-mounted transformers, municipal vaults, rail spurs, two sheds, equipment containment areas, trenches and surface drains, loading docks, and a former boiler room still remain onsite, extensive rust staining on the north side of the Wire Mill building and EVG building and heavy oil staining on concrete in former equipment areas inside both buildings are observed. Black sludge-like substance is observed in the EVG building in an equipment trench, and staining is observed along a stormwater channel located along the southern project site boundary. Except for this staining, discolored water, stressed vegetation, underground storage tanks (USTs), ponds, or lagoons are not observed on the project site. Although asbestos and lead were not observed in the existing buildings during the site reconnaissance, ACM and LBP have potential to be present due to the age of the buildings.

In response to comments on the Draft EIR, the following text on page 3.8-10 of the Draft EIR is revised as follows to describe the project's potential impacts associated with demolition of the existing industrial buildings on the project site:

Impact 3.8-1: Create a Significant Hazard to the Public or Environment through Routine Transport, Use, or Disposal of Hazardous Materials or Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials into the Environment

Proposed project construction activities would involve the demolition of existing buildings with potential to contain hazardous materials, and the use of construction materials typically associated with the construction of industrial warehouse development, which would involve ~~does include~~ the handling, transport, use, and disposal of hazardous materials. Adherence to existing regulatory compliance mandated by applicable federal and State law, City regulations, and manufacturer's instructions would minimize hazardous materials risks resulting from the routine transportation, use, storage, and disposal of hazardous materials during construction and operation of the proposed project and would minimize the potential to create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. This impact is **less than significant**.

Construction Activities Impacts

The proposed project includes the demolition, site clearing, and grading preparation of the project site and the construction, operation, and maintenance of one new warehouse/distribution building, including office space, loading docks for truck trailers, surface parking areas for both trailers and automobiles, landscaping, water quality basins, utility infrastructure, new streets, and exterior lighting and signage.

The project would involve the demolition of two warehouse buildings which have potential to contain hazardous building materials (e.g., ACM, LBP, PCBs, metals) due to their age. The project applicant would be required to comply with federal, state, and local laws and regulations related to the removal and disposal of any known or yet-unknown hazardous building materials encountered during construction, and regulations pertaining to worker safety, as described in Section 3.8.1, "Regulatory Setting." For example, the project applicant and its contractors would be required to comply with specific work practices to control the release of asbestos in accordance with the National Emission Standard for Asbestos (40 CFR Part 61, Subpart M). The project applicant and its contractors would also be required to comply with the Toxic Substances Control Act, which includes regulations pertaining to waste and debris from the demolition of buildings and structures containing PCBs (40 CFR Part 761). In addition, CCR Title 22, Division 4.5 addresses the management of hazardous waste, which includes hazardous materials found in buildings. Compliance with the Occupational Safety and Health Standards (29 CFR Parts 1910, 1915, and 1926) include requirements that would protect workers from the health hazards associated with asbestos and lead exposure. In addition, SCAQMD Rule 1403 includes work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM. Consistent with the regulations described above, the project applicant would be required to obtain licensed inspectors to determine the presence of hazardous building materials in structures to be demolished and abate or remove such materials to levels below applicable thresholds. Accordingly, compliance with existing laws and regulations would ensure that demolition of the existing buildings would not create a significant hazard to the public and the environment.

In response to comments on the Draft EIR, the following text on page 3.8-11 of the Draft EIR is revised as follows to describe additional regulations that would ensure impacts associated with hazardous building materials are less than significant:

Summary of Impacts

Regulatory compliance with the National Emission Standard for Asbestos, Toxic Substances Control Act, DTSC's Environmental Health Standards for the Management of Hazardous Waste, Occupational Safety and Health Standards, SCAQMD rules, Cal/OSHA, the SWRCB Construction General Permit, USDOT, and CHP regulations would minimize the potential risk of a spill or accidental release of hazardous materials through routine transport, use, or disposal during proposed project construction and operation activities and protect public health. Therefore, this impact is **less than significant**.

In response to comments on the Draft EIR, the following text on page 3.8-12 of the Draft EIR is revised as follows to include requirements for testing imported fill material:

Mitigation Measure 3.8-1: Develop and Implement a Soil Management Plan for Surficial Remediation

The applicant, developer, or landowner, and its construction contractor(s) shall develop a Soil Management Plan prior to start of construction to ensure proper surficial remediation of the onsite hazardous and impacted soils. The Soil Management Plan shall be implemented once ground-disturbing activities begin on the project site. The Soil Management Plan shall include a materials disposal plan specifying how the contractor will remove, handle, transport, and dispose of all excavated hazardous and impacted soils in a safe, appropriate, and lawful manner. The Soil Management Plan shall identify protocols for soil and landfilled materials testing and disposal, identify the approved disposal site, and include written documentation that the disposal site can accept the waste. Contract specifications shall mandate full compliance with all applicable local, State, and federal regulations related to the identification, transportation, and disposal of hazardous materials, including those encountered in excavated soils. In accordance with SCAQMD Rule 1166, impacted soil removed from the project site shall comply with the following:

- ▶ Be transported to an approved treatment/disposal facility,
- ▶ When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer,
- ▶ Prior to covering/tarpping, loaded impacted soils shall be wetted by spraying with dust inhibitors,
- ▶ Trucks or trailers shall be completely covered/tarped prior to leaving the project site to prevent particulate emissions to the atmosphere,
- ▶ The exterior of trucks, including tires, shall be cleaned off prior to the trucks leaving the excavation location.

If imported fill is necessary to replace contaminated soils that are removed from the site, the applicant, developer, or landowner, and its construction contractor shall demonstrate that imported soils are free of contamination and/or appropriate for the proposed use prior to being introduced onsite. The fill materials shall be selected and tested in accordance with DTSC's guidance, including the Preliminary Endangerment Assessment Guidance Manual (DTSC 1994) and the Information Advisory Clean Imported Fill Material Fact Sheet (DTSC 2001).

This Soil Management Plan shall be submitted to the City Planning Director and the San Bernardino County Environmental Health Division (the CUPA for the City of Rancho Cucamonga) for review and approval prior to issuance of a grading permit.

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4 REFERENCES

City of Rancho Cucamonga. 2025 (May). Draft Environmental Impact Report Newcastle Arrow Route Project.

Department of Toxic Substances Control. 1994 (January). Preliminary Endangerment Assessment Guidance Manual. Released in January 1994; reflects revisions made in October 2015. Available: https://dtsc.ca.gov/wp-content/uploads/sites/31/2023/06/PEA_Guidance_Manual.pdf. Accessed July 15, 2025.

———. 2001 (October). DTSC Information Advisory Clean Imported Fill Material Fact Sheet. Available: <https://dtsc.ca.gov/information-advisory-clean-imported-fill-material-fact-sheet/>. Accessed July 15, 2025.

DTSC. See Department of Toxic Substances Control.

Fehr & Peers. 2024. *Newcastle Arrow Non-CEQA Transportation Study*. Prepared for the City of Rancho Cucamonga.

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5 LIST OF PREPARERS

LEAD AGENCY

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Appendix A

Comment Letters

Letter 1

From: Liao, William <WLiao@socalgas.com>

Sent: Tuesday, June 3, 2025 6:32 AM

To: McPherson, Sean <Sean.McPherson@cityofrc.us>; coudry@civicsolutions.com

Cc: SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>; Shen, Wilton N. <WNShen@socalgas.com>

Subject: RE: Newcastle Arrow Route Project

CAUTION: This email is from outside our Corporate network. Do not click links or open attachments unless you recognize the sender and can confirm the content is safe.

Hello, Sean and Kirt.

My name is Will Liao. I am the Inland Region Planning Supervisor for SoCalGas.

I received a letter from the City of Rancho Cucamonga regarding the Newcastle Arrow Route Project at 12459 Arrow Route, APN 0229-131-24.

SoCalGas has High-Pressure and Transmission facilities in and near the project site. Please help us ensure everyone's safety by requiring the developer to contact 811/USA prior to any excavation and/or demolition activities so we can get out to Locate & Mark out our facilities. Excavations within 10 ft of our High-Pressure facilities will require a SoCalGas High-Pressure Standby on site.

Please have developer send us designs/plans as soon as practicable for us to review for potential conflicts with our facilities. Alterations/Relocations of High-Pressure facilities can take around 9 to 12 months to plan and execute, and longer for Transmission facilities. The sooner we have 95%+ plans for reviews, the better the chance for a successful outcome.

If the developer will need new gas services, please have them contact our Builder Services group to begin the application process as soon as practicable, at: [Builder Services](#) | [SoCalGas](#)

Please let me know if you have any questions.

Sincerely,

Will Liao
Region Planning Supervisor
Redlands HQ / Southern Region
Mobile: 646-213-5895





Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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,

2-1

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).

2-2

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.

2-2
(cont.)

2-2
(cont.)

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.

2-3

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."

2-4

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

2-4
(cont.)

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

2-5

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](#).

2-6

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](#).

2-7

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.

Sean McPherson

June 25, 2025

Page 5

Sincerely,

Tamara Purvis

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

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Sean McPherson

June 25, 2025

Page 6

Dave Kereazis

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SENT VIA E-MAIL:

July 2, 2025

sean.mcpherson@cityofrc.us

Sean McPherson, Principal Planner
City of Rancho Cucamonga, Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

**Draft Environmental Impact Report (EIR) for the
Newcastle Arrow Route Project (Proposed Project) (SCH No: 2023110039)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Rancho Cucamonga is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

3-1

Based on the Draft EIR, the Proposed Project consists of: 1) demolishing two non-operational and unoccupied industrial buildings that are approximately 157,221 square feet and 20,000 square feet, respectively, and a 100-space surface parking lot; and 2) constructing, operating, and maintaining one concrete tilt-up industrial warehouse building with approximately 334,776 gross square feet of floor area on 14.8 acres.¹ The Proposed Project is located at 12459 Arrow Route in Rancho Cucamonga.² Based on a review of aerial photographs, the nearest sensitive receptor (e.g., residential development) appears to be located 0.3 mile northeast of the project site.³ Construction of the Proposed Project is scheduled to occur over a 12-month period from March 2026 to March 2027.⁴

South Coast AQMD Comments

3-2

Potential Underestimation of Health Risk Impacts From On-Site Heavy-Duty Trucks

Based on the Draft EIR, the air quality modeling analysis assumed that all 44 loading docks will be utilized, with each truck idling for 15 minutes at the dock and traveling at five miles per hour (mph) on-site.⁵ The Draft EIR, however, does not provide any evidence or explanation to support these assumptions. While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NOx idle emission standard which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as “clean idle” certified, are permitted to idle longer than five minutes

¹ Draft EIR, p. 14.

² *Ibid*, p.13.

³ *Ibid*, p. 46.

⁴ *Ibid*, p. 59.

⁵ Draft EIR, p. 94.

3-2
(cont.)

when situated more than 100 feet from sensitive land uses such as homes and schools.⁶ Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.⁷ As a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the Health Risk Assessment (HRA) may have substantially underestimated the full extent of operational health risks associated with the diesel particulate matter (DPM) emissions from the anticipated onsite heavy-duty truck activities.

To ensure a more accurate health risk evaluation, the HRA should be updated to reflect truck idling durations that are consistent with regulatory allowances and realistic operational patterns expected for the Proposed Project.

Missing Off-Site Truck Route in AERMOD Modeling Analysis

3-3

Accurate representation of the off-site truck routes is essential for accurately modeling and assessing air quality and health risk impacts from diesel truck emissions using AERMOD, as well as for evaluating potential exposure to sensitive receptors. Review of the AERMOD modeling files indicate that the off-site truck route connecting the Proposed Project site to the nearest freeway or major roadway was not clearly identified or included in the modeling input file. The Lead Agency is recommended to revise the AERMOD modeling analysis to clearly depict the entire off-site truck route network, including the segment linking the Proposed Project site to the nearest freeway. For consistency throughout the EIR, the Lead Agency is recommended to update the project description, HRA assumptions, and the traffic study documentation accordingly.

Lack of Commitment to Require Ultra-Low VOC Coatings per Mitigation Measure 3.2-1

3-4

Based on the Draft EIR, the estimates of volatile organic compound (VOC) emissions from the use of architectural coatings during construction assume that all coatings used for the Proposed Project will have a VOC content of less than 10 grams per liter (g/L), resulting in total VOC emissions less than the South Coast AQMD air quality significance threshold.⁸ However, this assumption appears to rely on Mitigation Measure 3.2-1: Construction Low VOC Coatings, which requires the use of ultra-low VOC architectural coatings (≤ 10 g/L) during all phases of construction. However, the Draft EIR does not provide sufficient information demonstrating that this mitigation measure is feasible, supported by evidence, or enforceable. Specifically, South Coast AQMD Rule 1113 – Architectural Coatings allows for a wide range of VOC limits depending on the coating type, and products with a VOC content of 10 g/L or less may not be commercially available or technically appropriate for all applications required during construction of the Proposed Project.

To support the conclusion that VOC emissions will be less than the air quality significance threshold after mitigation is applied, the Lead Agency should revise the EIR to ensure the Mitigation Measure 3.2-1 is feasible in practice, not just in modeling assumptions by:

⁶ CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in [Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling](https://www2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf), https://www2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf

⁷ CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., https://www2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

⁸ Draft EIR, p. 102.

- 3-4
(cont.)
- Clearly explaining how Mitigation Measure 3.2-1 will be implemented and enforced; and
 - Providing evidence of availability of all intended architectural coatings products with a VOC content of less than 10 g/L, such as Safety Data Sheets, and suitability for the proposed construction activities.

Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

3-5

Since the Proposed Project consists of the development of a 334,776 square foot warehouse, once the warehouse is occupied, the Proposed Project's warehouse owners and operators will be required to comply with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program and Rule 316 – Fees for Rule 2305. Rule 2305 and Rule 316 aim to reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM so as to reduce adverse public health impacts on communities located near warehouses. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn WAIRE Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Therefore, the Lead Agency is recommended to review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements, design features/enhancements, and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. For questions concerning Rule 2305 implementation and compliance, please call (909) 396-3140 or email waire-program@aqmd.gov. For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.

South Coast AQMD Air Permits and Role as a Responsible Agency

3-6

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,⁹ Rule 203 – Permit to Operate,¹⁰ Rule 401 – Visible Emissions,¹¹ Rule 402 – Nuisance,¹² Rule 403 – Fugitive Dust,¹³ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁴ Rule 1113 – Architectural Coatings,¹⁵ Rule 1166 – Volatile Organic Compound Emissions from

⁹ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹⁰ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹¹ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

¹² South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹³ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹⁴ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹⁵ South Coast AQMD, Rule 1113 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

Decontamination of Soil,¹⁶ Rule 1179 – Publicly Owned Treatment Works Operations,¹⁷ Regulation XIII – New Source Review,¹⁸ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁹ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²⁰ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²¹ etc. It is important to note if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

3-6
(cont.)

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guidelines Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the Final EIR should include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

3-7

¹⁶ South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹⁷ South Coast AQMD, Rule 1179 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

¹⁸ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁹ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

²⁰ South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

²¹ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

3-7
(cont.)

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,
Sam Wang

Sam Wang

Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

BR:DN:SG
SBC250527-05
Control Number

Appendix B

Mitigation Monitoring and Reporting Program



MITIGATION MONITORING AND REPORTING PROGRAM FOR THE

Newcastle Arrow Route Project

SCH No. 2023110039

Prepared for:



City of Rancho Cucamonga
Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

August 2025

MITIGATION MONITORING AND REPORTING PROGRAM FOR THE **Newcastle Arrow Route Project**

SCH No. 2023110039

Prepared for:



City of Rancho Cucamonga
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

Contact:

Sean McPherson
Principal Planner
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August 2025

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LIST OF ABBREVIATIONS

CEQA	California Environmental Quality Act
City	City of Rancho Cucamonga
EIR	environmental impact report
g/L	grams per liter
MMRP	mitigation monitoring and reporting program
NZE	near-zero emission
PRC	Public Resources Code
YSMN	Yuhaaviatam of San Manuel Nation
ZE	zero emission

MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.), the City of Rancho Cucamonga (City) prepared an environmental impact report (EIR) for the Newcastle Arrow Route Project (State Clearinghouse No. 2023110039) that identified significant impacts and mitigation measures that would reduce the identified impacts to a less-than-significant level, where feasible.

CEQA Section 21081.6 and State CEQA Guidelines Sections 15091(d) and 15097 require public agencies to adopt a reporting and monitoring program for the changes made to the project it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment. This mitigation monitoring and reporting program (MMRP) has been prepared for the project because the EIR identifies potentially significant adverse impacts related to project implementation, as well as mitigation measures to reduce those impacts. Adoption of this MMRP would occur along with approval of the project.

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed in a satisfactory manner before and during project construction and operation, as applicable. Table 1, provided below, has been prepared to assist the responsible parties with implementing the mitigation measures. It identifies the mitigation measures, the entities responsible for implementing the mitigation measures, and the timeframe for implementation of the mitigation measures. The table also includes a column for the City to document implementation of the mitigation measures after project approval. The numbering of mitigation measures follows the numbering used in the EIR. Mitigation measures that are referenced more than once in the EIR are not duplicated in the MMRP table.

ROLES AND RESPONSIBILITIES

The City is responsible for overall administration of the MMRP and for verifying that the project proponent, construction contractor, or other designated party has completed the necessary actions for each measure. The party responsible for implementing each item will identify the staff members responsible for coordinating with the City on the MMRP.

MITIGATION MONITORING AND REPORTING PROGRAM TABLE

Table 1, which identifies the mitigation measures applicable to the proposed project, includes the following table columns:

- ▶ **Mitigation Measures:** This column presents all the mitigation measures identified in the EIR, each of which has been adopted and incorporated into the project.
- ▶ **Implementing Party:** This column identifies the entity responsible for undertaking the required action.
- ▶ **Timing:** Implementation of the action must occur before or during some part of project approval, project design, or project construction or on an ongoing basis. This column identifies the timing for implementation of each mitigation measure.
- ▶ **Verification of Compliance:** The City is responsible for ensuring that mitigation measures are successfully implemented. The "Verification of Compliance" column is to be used by the City to indicate how and when a mitigation measure was implemented. The City, at its discretion, may delegate implementation responsibility or portions thereof to qualified consultants or contractors.

Table 1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Implementing Party	Timing	Verification of Compliance
Air Quality			
Mitigation Measure 3.2-1: Construction Low VOC Coatings To reduce VOC emissions during construction activities involving the application of coatings, the construction contractors shall use low-VOC coatings with a VOC content of 10 grams per liter (g/L) or less during all phases of construction. Prior to the issuance of a grading permit, the project applicant shall submit a list of coatings to be used, their respective VOC content, and a summary of the surface area to be painted to the City. The project applicant and future tenants shall report this information to the City to verify compliance. This shall be enforced through oversight by the City and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are informed of all ongoing responsibilities during construction.	Project applicant, construction contractors, and future tenants, with City oversight	Prior to issuance of a grading permit and during all phases of construction involving the application of coatings	
Mitigation Measure 3.7-2: Zero Emission Design and Operation This mitigation measure is described under "Greenhouse Gase Emissions and Climate Change," below.	See below	See below	
Mitigation Measure 3.7-4: Idling Limits During Operations This mitigation measure is described under "Greenhouse Gase Emissions and Climate Change," below.	See below	See below	
Archaeological, Historical, and Tribal Cultural Resources			
Mitigation Measure 3.3-1: For All Ground-Disturbing Construction Activities, Halt Ground Disturbance Upon Discovery of Subsurface Archaeological Deposits In the event that any precontact or historic era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits are discovered during construction, all ground-disturbing activity within 50 feet of the resources shall be halted by construction personnel, and a qualified professional archaeologist (one who meets the Secretary of the Interior's Professional Qualification Standards for archaeology) shall be retained to assess the significance of the find. If the qualified archaeologist determines the archaeological material to be Native American in nature, the City shall contact the appropriate California Native American tribes (e.g., YSMN, and other tribes affiliated with the project site). A California Native American tribe(s) that is traditionally and culturally affiliated with the project site may make recommendations for further evaluation and treatment as necessary and provide input on the preferred treatment of the find. If the find is determined to be significant by the qualified archaeologist or the tribal representative (i.e., because it is determined to constitute a unique archaeological resource or a tribal cultural resource, as appropriate), the qualified archaeologist and tribal representative, as appropriate, shall develop, and the applicant shall implement appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures shall include but would not necessarily be limited to preservation in place (which shall be the preferred manner of protecting unique archaeological resources and tribal cultural resources), archival research, monitoring, subsurface testing, or contiguous block unit excavation and data recovery (pursuant to a data recovery plan). No work at the discovery location shall resume until all necessary investigation and evaluation of the resource has been concluded by the archaeologist and/or tribal representative(s).	Project applicant, construction contractors, qualified professional archaeologist, and tribal representative, with City oversight	During construction-related ground-disturbing activities	

Mitigation Measures	Implementing Party	Timing	Verification of Compliance
Mitigation Measure 3.3-2: Provide all Cultural Documents to the Yuhaaviatam of San Manuel Nation and Continue Coordination The City shall provide the final copy of all cultural resources documents created as part of the proposed project (e.g., isolate records, site records, survey reports, testing reports) to Yuhaaviatam of San Manuel Nation (YSMN; also known as the San Manuel Band of Mission Indians). The City and project applicant, in good faith, will continue to coordinate with YSMN throughout the life of the proposed project. This coordination shall include communications such as alerting YSMN prior to any ground disturbing activities.	Project applicant and the City	Throughout the life of the project	
Energy			
Mitigation Measure 3.7-1: Zero Emission Construction Equipment This mitigation measure is described under "Greenhouse Gas Emissions and Climate Change," below.	See below	See below	
Mitigation Measure 3.7-2: Zero Emission Design and Operation This mitigation measure is described under "Greenhouse Gas Emissions and Climate Change," below.	See below	See below	
Greenhouse Gas Emissions and Climate Change			
Mitigation Measure 3.7-1: Zero Emission Construction Equipment At least 50 percent of the equipment used onsite to construct the project shall be powered by near-zero emission (NZE) or zero emission (ZE) technology. Examples of NZE and ZE technologies include battery electric, renewable diesel, hydrogen, or biomethane. This requirement applies to all construction equipment greater than or equal to 50 horsepower. If NZE or ZE equipment and/or fuel options are not commercially available for the project's construction equipment needs, the applicant shall demonstrate that a minimum of three off-road equipment fleet owners/operators/fuel providers in the San Bernardino County or adjacent counties were contacted and responded that NZE or ZE equipment and/or fuel options are not commercially available for the project's heavy-duty off-road equipment needs.	Project applicant and construction contractor, with City oversight	During all phases of construction	
Mitigation Measure 3.7-2: Zero Emission Design and Operation To reduce impacts from operations-related exhaust emissions, future building tenants shall be required to employ zero emission (ZE) yard equipment and include EV charging stations or fueling stations to allow for use of ZE equipment. ▶ All yard equipment used onsite for warehouse operations, including but not limited to forklifts and yard trucks, shall be powered by ZE technology, such as battery electric. The project applicant shall provide adequate charging stations within the project site to allow for the use of 100 percent EV equipment. These requirements are consistent with Strategy 1.4 of the CAP, which requires equipment used in the operation of commercial and industrial uses greater than or equal to 50 horsepower to be equipped with ZE technology or fuels. ▶ The project applicant shall provide 10 percent "EV Ready" parking spaces, and 5 percent "EV Installed" parking spaces. These requirements are consistent with Strategy 1.2 of the CAP and, for the purposes of this measure, applies to both employee parking and medium-duty and heavy-duty truck parking. In order	Project applicant, facility owner, and future building tenant(s), with City oversight	Prior to issuance of a Business License and throughout the life of the project	

Mitigation Measures	Implementing Party	Timing	Verification of Compliance
for this measure to be feasible, the project applicant shall ensure that the building design includes adequate electrical infrastructure to allow for the charging of all yard equipment as well as future employee vehicle and medium-duty and heavy-duty truck charging at project site. ▶ The project applicant shall disclose this requirement to all tenants/business entities prior to the signing of any lease agreement. In addition, the limitation on using only ZE off-road yard equipment and providing for future employee vehicle and truck charging shall be included in all leasing agreements. Prior to issuance of a Business License for a new tenant/business entity, the project facility owner and tenant/business entity shall provide to the City Planning Division a signed document (verification document) noting that the Project development/facility owner has disclosed to the tenant/business entity the requirement to use only ZE equipment for daily operations. ▶ The use of gasoline-powered landscape equipment shall be prohibited. This shall be enforced through the project conditions of approval. For this measure to be successfully implemented, the project applicant shall install electrical outlets on the exterior of the building so that the corded electric landscaping equipment can be more easily used in different areas, and batteries can be charged if indoor charging is not available. If ZE equipment and/or fuel options are not commercially available for the project's heavy-duty off-road equipment needs, the applicant shall demonstrate that a minimum of three off-road equipment fleet owners/operators/fuel providers in the San Bernardino County or adjacent counties were contacted and responded that zero emission equipment and/or fuel options are not commercially available for the project's heavy-duty off-road equipment needs.			
Mitigation Measure 3.7-3: Install Renewable Energy The project applicant and future tenants shall install adequate renewable energy on-site to meet maximum future power needs, including both building uses as well as charging for electrical equipment, vehicles, and trucks. The renewable energy will be installed consistent with Development Code Section 17.76.020, Development Criteria for Solar Systems, Subsection B. Installation of renewable energy shall be demonstrated to the City prior to the issuance of building permits to construct and shall be subject to City approval.	Project applicant and future tenant(s), with City oversight	Prior to the issuance of building permits	
Mitigation Measure 3.7-4: Idling Limits During Operations The project proponent and future tenants shall ensure that all medium- and heavy-duty trucks that visit the project site limit their idling by shutting down engines when not in use. Idling shall be limited to a maximum idling time of less than 3 minutes at any given location and a total of 15 minutes total within the project site for each truck visit. The future tenants shall install clear signage regarding the limitation on idling time at the delivery driveway and loading areas. The project applicant and future tenants shall report this information to the City to verify compliance. This shall be enforced through oversight by the City and shall be included as part of the contractual lease agreement language to ensure the tenants/lessees are informed of all ongoing responsibilities.	Project proponent and future tenant(s), with City oversight	Throughout the life of the project	

Mitigation Measures	Implementing Party	Timing	Verification of Compliance
Mitigation Measure 3.13-2a: Implement Commute Trip Reduction Marketing This mitigation measure is described under "Transportation," below.	See below	See below	
Mitigation Measure 3.13-2b: Provide Employee Rideshare Program This mitigation measure is described under "Transportation," below.	See below	See below	
Mitigation Measure 3.13-2c: Provide End-of-Trip Bicycle Facilities This mitigation measure is described under "Transportation," below.	See below	See below	
Mitigation Measure 3.13-2d: Provide Employer-Sponsored Vanpool This mitigation measure is described under "Transportation," below.	See below	See below	
Hazards and Hazardous Materials			
Mitigation Measure 3.8-1: Develop and Implement a Soil Management Plan for Surficial Remediation The applicant, developer, or landowner, and its construction contractor(s) shall develop a Soil Management Plan prior to start of construction to ensure proper surficial remediation of the onsite hazardous and impacted soils. The Soil Management Plan shall be implemented once ground-disturbing activities begin on the project site. The Soil Management Plan shall include a materials disposal plan specifying how the contractor will remove, handle, transport, and dispose of all excavated hazardous and impacted soils in a safe, appropriate, and lawful manner. The Soil Management Plan shall identify protocols for soil and landfilled materials testing and disposal, identify the approved disposal site, and include written documentation that the disposal site can accept the waste. Contract specifications shall mandate full compliance with all applicable local, State, and federal regulations related to the identification, transportation, and disposal of hazardous materials, including those encountered in excavated soils. In accordance with SCAQMD Rule 1166, impacted soil removed from the project site shall comply with the following: ▶ Be transported to an approved treatment/disposal facility, ▶ When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer, ▶ Prior to covering/tarping, loaded impacted soils shall be wetted by spraying with dust inhibitors, ▶ Trucks or trailers shall be completely covered/tarped prior to leaving the project site to prevent particulate emissions to the atmosphere, ▶ The exterior of trucks, including tires, shall be cleaned off prior to the trucks leaving the excavation location. If imported fill is necessary to replace contaminated soils that are removed from the site, the applicant, developer, or landowner, and its construction contractor shall demonstrate that imported soils are free of contamination and/or appropriate for the proposed use prior to being introduced onsite. The fill materials shall be selected and tested in accordance with DTSC's guidance, including the Preliminary Endangerment Assessment Guidance Manual (DTSC 1994) and the Information Advisory Clean Imported Fill Material Fact Sheet (DTSC 2001).	Project applicant, developer, landowner, and construction contractors, with oversight by the City Planning Director and the San Bernardino County Environmental Health Division	Prior to issuance of grading permit and for the duration of ground-disturbing construction activities	

Mitigation Measures	Implementing Party	Timing	Verification of Compliance
This Soil Management Plan shall be submitted to the City Planning Director and the San Bernardino County Environmental Health Division (the CUPA for the City of Rancho Cucamonga) for review and approval prior to issuance of a grading permit.			
Transportation			
Mitigation Measure 3.13-2a: Implement Commute Trip Reduction Marketing Prior to the issuance of certificate of occupancy by the City, the project tenant(s) shall implement a marketing strategy to promote the project site employer's commute trip reduction program. The marketing strategy shall reduce project generated VMT per employee by 4 percent. The following features (or similar) shall be evaluated as part of development of the marketing strategy: ▶ on-site or online commuter information services, ▶ employee transportation coordinators, ▶ on-site or online transit pass sales, and ▶ guaranteed ride home service.	Project tenant(s), with City oversight	Prior to issuance of certificate of occupancy and throughout the life of the project	
Mitigation Measure 3.13-2b: Provide Employee Rideshare Program Prior to the issuance certificate of occupancy by the City, the project tenant(s) shall implement a ridesharing program for employees with similar commutes with funding requirements for employers. Existing programs including IE Commuter can be leveraged for this measure. The employee rideshare program shall reduce project generated VMT per employee by 4 percent. The following strategies shall be evaluated as part of development of the rideshare program: ▶ designating a certain percentage of desirable parking spaces for ridesharing vehicles, ▶ designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles, and ▶ providing an app or website for coordinating rides.	Project tenant(s), with City oversight	Prior to issuance of certificate of occupancy and throughout the life of the project	
Mitigation Measure 3.13-2c: Provide End-of-Trip Bicycle Facilities Prior to the issuance of building permits by the City, the project applicant shall install and maintain end-of-trip facilities for employee use. The implementation of end-of-trip facilities shall reduce project generated VMT per employee by 0.3 percent. End-of-trip facilities considered in the proposed project shall include but not be limited to: bike parking, bike lockers, showers, and personal lockers.	Project applicant, with City oversight	Prior to issuance of building permits and throughout the life of the project	
Mitigation Measure 3.13-2d: Provide Employer-Sponsored Vanpool Prior to the issuance of certificate of occupancy by the City, the project tenant(s) shall implement an employer-sponsored vanpool service. The employer-sponsored vanpool service shall be designed and operated to reduce project generated VMT per employee by 1.6 percent.	Project tenant(s), with City oversight	Prior to issuance of certificate of occupancy and throughout the life of the project	

Notes: CAP = climate action plan; City = City of Rancho Cucamonga; CUPA = certified unified program agency; DTSC = Department of Toxic Substances Control; EV = electric vehicle; IE = Inland Empire; SCAQMD = South Coast Air Quality Management District; VMT = vehicle miles traveled; VOC = volatile organic compound; YSMN = Yuhaaviatam of San Manuel Nation; ZE = zero emission

REFERENCES

Department of Toxic Substances Control. 1994 (January). Preliminary Endangerment Assessment Guidance Manual. Released in January 1994; reflects revisions made in October 2015. Available: https://dtsc.ca.gov/wp-content/uploads/sites/31/2023/06/PEA_Guidance_Manual.pdf. Accessed July 15, 2025.

———. 2001 (October). DTSC Information Advisory Clean Imported Fill Material Fact Sheet. Available: <https://dtsc.ca.gov/information-advisory-clean-imported-fill-material-fact-sheet/>. Accessed July 15, 2025.

DTSC. See Department of Toxic Substances Control.