



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

Katherine M. Butler, MPH, Director  
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[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

August 06, 2025

Kevin Ponce  
Environmental Program Manager  
Department of Cannabis Control  
2920 Kilgore Road  
Rancho Cordova CA 95670  
[kevin.ponce@cannabis.ca.gov](mailto:kevin.ponce@cannabis.ca.gov)

RE: NEGATIVE DECLARATION FOR PREM GEN CORP INITIAL STUDY/NEGATIVE  
DECLARATION DATED JULY 29, 2025, STATE CLEARINGHOUSE NUMBER  
[2025071210](#)

Dear Kevin Ponce,

The Department of Toxic Substances Control (DTSC) reviewed the Negative Declaration (ND) for Prem Gen Corp Initial Study/Negative Declaration (Project). The Department of Cannabis Control prepared an Initial Study / Negative Declaration for the proposed Project which involves evaluating the issuance of State licenses for the proposed operation of indoor commercial cannabis cultivation, nursery, and distribution businesses in three phases within three existing 5,000 square-foot warehouses located at 536, 538, and 540 El Roya Avenue on an approximate 1.05-acre parcel in an Industrial district. Two of the three warehouses have been in commercial cannabis production since 2018. Phase 3 would include the demolition and rebuild of the warehouse at 538 El Roya Avenue. DTSC recommends and requests consideration of the following comments:

1. 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. All imported soil/fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's PEA Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil/fill material, there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

DTSC would like to thank you for the opportunity to comment on the ND for Prem Gen Corp Initial Study/Negative Declaration Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

Sincerely,



Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
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Kevin Ponce  
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cc: (via email)

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