



# MEMORANDUM

**To:** Rocio Lopez, Consulting Planner

**FROM:** Tracy Zinn, Principal

**DATE:** January 30, 2024

**RE:** **Magnolia Avenue Business Center – Responses to DTSC Comment Letter (SCH No. 2023120166)**

As the preparer of the Magnolia Business Center Initial Study/Mitigated Negative Declaration (IS/MND), T&B Planning, Inc. provides responses to a comment letter submitted by DTSC.

Please refer to the comment letter attached to this Memorandum. Comments have been numbered and the corresponding responses are provided below.

Comment	Response
1	The City of Corona acknowledges and appreciates the comments provided by the Department of Toxic Substances Control (DTSC). This comment provides a general description of the Project that is consistent with the Project described by the Project’s IS/MND. Please refer also to the responses to Comments 2 through 4, below.
2	DTSC notes the Potential Contaminants of Concern associated with the Project site and recommends the Project Applicant continue to work with DTSC’s project manager(s) for this site and to adhere to all conditions outlined in the Health & Safety Plan for the site. The Commenter is referred to Section 9 of the Project’s IS/MND, which includes a detailed analysis of the Project site’s existing conditions with respect to contamination. As noted therein, a Land Use Covenant (LUC) has been prepared and recorded with the County Recorder that limits the Project site to commercial and industrial use (no residential, hospitals, day care, or schools are allowed) and also imposes other requirements of the site-specific Soil Management Plan (SMP), which was included as <i>Technical Appendix F6</i> to the Project’s IS/MND. The LUC has been reviewed and approved by DTSC and the Environmental Protection Agency (EPA). The plan for implementation includes the existing property owner removing the areas of elevated concentrations of PCBs and then the Project Applicant grading the Project site under the SMP. The grading would be coordinated so that the soil in the area of the required cap remains in place and is not moved to outside of the Toxic Substances Control Act (TSCA) Cap. Annual inspections are required with a report submitted to DTSC confirming compliance with the terms of the LUC. The LUC will be revised and re-recorded upon



	completion of the pending field work. Accordingly, because the IS/MND properly accounts for the site’s existing contaminated conditions, no revision to the IS/MND is warranted pursuant to this Comment.
3	The Commenter recommends compliance with DTSC’s 2006 <i>Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers</i> , during demolition activities associated with the Project. Since preparation of the Project’s IS/MND, the structures on the property all have been demolished and disposed of in accordance with an approved demolition permit, and all demolition activities occurred in full conformance with SCAQMD Rule 1403. Accordingly, no revision to the IS/MND is warranted pursuant to this Comment.
4	The Commenter recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within approved screening levels for the intended land use in order to minimize the possibility of introducing contaminated soil and fill material. This comment is noted. Testing of imported soils would occur by the Applicant’s contractor prior to importing earth materials to the Project site.
5	The City acknowledges and appreciates the comments provided by this Comment letter, and the City will direct any questions to DTSC at the contact information provided.