



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Director
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Gavin Newsom
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SENT VIA ELECTRONIC MAIL

September 4, 2024

Mercenia Lugo
Planning Division Manager
City of Covina
125 East College Street
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mlugo@covinaca.gov

RE: MITIGATED NEGATIVE DECLARATION FOR THE 529 CUTTER WAY SELF STORAGE PROJECT DATED AUGUST 23, 2024, STATE CLEARINGHOUSE NUMBER [2024080951](#)

Dear Mercenia Lugo,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the 529 Cutter Way Self Storage Project (Project). The proposed Project consists of the construction and operation of a self-storage facility. The new facility would consist of one four-story building that is 183,584 square feet and approximately 46-feet and 8-inches in height. The self-storage building would include 847 square feet of office space and 45,049 square feet of storage space on the ground floor; and 45,896 square feet of storage space on each of the second, third, and fourth floors. The proposed Project would include 1,370 storage units. After reviewing the Project, DTSC recommends and requests consideration of the following comments:

1. DTSC recommends that 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 the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

2. The Phase I Environmental Site Assessment Section 6.3.1 Asbestos-Containing Materials (ACMs) by Partner states "Prior to disturbance, Partner recommends a comprehensive asbestos survey of the property be completed to determine the presence, condition, friability and likely future condition of suspect or confirmed ACM. All suspect materials must be handled as ACM according to local, state and federal regulations until the results of sampling and analysis indicate the material is a non-ACM. Partner was not provided building plans or specifications for review, which may have been useful in determining areas likely to have used ACM."

Since the MND has not added mitigation measures as recommended by Partner, DTSC recommends 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 PEA Guidance Manual](#).

DTSC appreciates the opportunity to comment on the MND for the 529 Cutter Way Self Storage Project. Thank you for your assistance in protecting California's people and

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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 [email](#) for additional guidance.

Sincerely,

Tamara Purvis

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HWMP - Permitting Division – CEQA Unit
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cc: (via email)

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