

Date: October 2, 2024

Subject: Technical Memorandum-Summary
Tentative Tract Map No. 38605, Riverside County, California
Department of Toxic Substance Control (DTSC) State Clearinghouse
Number # 2024090718

Attention: Russel Brady, Contract Planner (Riverside County)
Mitch Adkison, Executive Vice Principal (Adkan Engineers)
Dave Kereazis, Associate Environmental Planner
(HWMP-Permitting Division- CEQA Unit)
Tamara Purvis, Associate Environmental Planner
(HWMP-Permitting Division- CEQA Unit)
Scott Wiley, Associate Governmental Program Analyst
(HWMP-Permitting Division- CEQA Unit)
David McAlister, PG (McAlister GeoScience Principal in Charge); and
Jorge Ramos, GIT (McAlister GeoScience Project Manager).

Dear Mr. Russel Brady:

McAlister GeoScience is pleased to submit this Technical Memorandum summarizing the Mitigated Negative Declaration (MND) for the Tentative Tract Map No. 38605 project (the Subject Property), project communication and the history of sampling conducted on the Subject Property.

Summary of communication:

The Subject Property consists of a 95.96-acre property located east of McAllister Street and north of El Sobrante Road in the Victora Grove community of the Lake Mathews/Woodcrest Area Plan portion of unincorporated Riverside County. Two applications for a Change of Zone and two Notices of Non-Renewal and an Agricultural Preserve Diminishment were submitted for the Subject Property.

Approval of these discretionary actions would allow for the development of the Subject Property with 163 single-family detached residential units on minimum 10,000 square-foot lots on approximately 50.39 acres; a park site on a total of approximately 2.7 acres; three detention/ water quality basins on approximately 10.3 acres; slopes and open space on approximately 14.5 acres; and private internal roadways on approximately 18.1 acres.

The DTSC recommended and requested consideration of the following:

- The Subject Property was agricultural land (orchards) from the late 1960s to the 1990s which were cleared on or by 2009. The DTSC determined when agricultural crops and/or land uses are proposed or rezoned for residential use, a number of contaminants of concern (COCs) can be present. The DTSC requested identification of the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. Specifically dichloro-diphenyl-trichloroethane, toxaphene, dieldrin and arsenic if present. Arsenic must meet the HHRA NOTE NUMBER 3, DTSC-SLs approved thresholds. If they do not, remedial action must take place to mitigate them below those thresholds.
- The DTSC stated COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed for. If smudge pots were routinely utilized at the Subject Property, Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons sampling may be required.
- The DTSC recommended all imported soil and fill materials should be tested and analyzed for COCs to meet the screening levels in the Preliminary Endangerment Assessment (PEA) Guidance Manual. The DTSC further recommended referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. Additionally, documenting/ sampling of the origin of the soil or fill material to ensure the imported material is suitable for the intended land use. The DTSC stated soil sampling should include analysis based on the source of the fill and knowledge of the prior land use.
- The DTSC concurred a Storm Water Pollution Prevention Plan (SWPP) for the Subject Property should be prepared and implemented in accordance with applicable regulations prior to any grading activities, based on the findings and recommendation of the Phase I. The DTSC also concurred testing and treatment of all irrigation piping for asbestos containing materials (AOCs) if necessary. The DTSC stated removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. The DTSC stated sampling near current and/or former buildings should be conducted in accordance with DTSCs PEA Guidance Manual.

The following is a summary of sampling conducted on the Subject Property for the Pesticides and OCPs:

Phase I/II Environmental Site Assessment by McAlister GeoScience, dated June 17, 2015

McAlister GeoScience performed a previous Phase I Environmental Site Assessment and following Phase II for Victoria Heights (the Subject Property) in June 2015. The subject site was larger than the current Subject Property boundaries and totaled approximately 350 acres of land across 15 parcels. At the time of the previous Phase I ESA, the Subject Property was primarily undeveloped. A single gated residence occupied the property and was inaccessible at the time of such report. Areas of unauthorized dumping of household debris were observed. Two water wells occupied the western portion of the property and two ASTs occupied the eastern portion of the property at such time.

McAlister GeoScience performed a follow up Phase II on the Subject Property. Soil samples were collected throughout the property, including near the debris piles and ASTs, and throughout the agricultural areas. The concentration of metals detected in the soil samples were within the range of natural occurring metals in California soils. Concentrations of pesticides in soil were detected. However, concentrations were below their respective screening limits. McAlister GeoScience issued the findings of the Phase I and Phase II ESAs in a singular report. McAlister GeoScience concluded no Recognized Environmental Conditions were present on the property. However, the following actions were recommended:

- A Storm Water Pollution Prevention Plan (SWPPP) for the Subject Property should be prepared and implemented in accordance with applicable regulations prior to any grading activities;
- In the event of any future construction and/or excavation activities at the Subject Property, dust suppression may be necessary during construction activities; and
- Abandonment or removal of irrigation piping located onsite, following sampling and analysis for asbestos containing materials potentially present in the irrigation piping.

Soil Sampling Report by McAlister GeoScience, dated October 9, 2018

McAlister GeoScience issued a Soil Sampling Report in October 2018. The project area contained the Subject Property and additional parcels to the north, south, east, and west. Following the 2015 McAlister report, the Riverside County Planning Department and the Riverside County Department of Environmental Health requested further sampling during the Environmental Impact Report (EIR) period in accordance with California Department of Toxic Substances Control (DTSC) Interim Guidance for Sampling Agricultural Properties (Third Revision) dated August 7, 2008.

A total of 115 samples were submitted for analysis of Organochloride Pesticides (OCPs) by EPA Method 8081. A total of 117 samples were submitted for analysis of arsenic by EPA Method 6010. The results indicate DDD was detected above its respective laboratory reporting limit in 64 of the samples. Concentrations of DDE were detected above its respective laboratory reporting limit in one sample. Concentrations of DDT was detected above its respective laboratory reporting limit in 34 samples. Dieldrin was detected above its respective laboratory reporting limit in three (3) samples. All concentrations of detected OCPs were below their respective Environmental Screening Limits.

Arsenic was detected above its laboratory reporting limit in 19 of the samples. Concentrations of Arsenic were detected above the ESL, however; the reported arsenic values were below the naturally occurring level of arsenic in California soils, with the exception of three samples. Two of the samples were measured at the level of naturally occurring arsenic, and one was measured above the level of naturally occurring arsenic. None of these three samples are located within the current Subject Property boundaries.

Given only one of the collected samples was above the level of naturally occurring arsenic in California soils, and the low concentrations of OCPs, McAlister GeoScience concluded the planned excavation and grading could be conducted without further investigation or remediation activities.

McAlister GeoScience appreciates the opportunity to provide this technical memorandum. Please contact the undersigned should you have any further comments, questions, or concerns.

Sincerely,



David McAlister
Principal in Charge

