



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

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**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

April 24, 2025

Casey Lauderdale  
Supervising Planner  
City of Fresno  
2600 Fresno Street, Room 3065  
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RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WEST AREA  
NEIGHBORHOODS SPECIFIC PLAN (FORMERLY SPECIFIC PLAN OF THE WEST  
AREA) DATED MARCH 12, 2025, STATE CLEARINGHOUSE NUMBER [2019069117](#)

Dear Casey Lauderdale,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for The West Area Neighborhoods Specific Plan (formerly Specific Plan of the West Area) (Project). The proposed Project will establish the land use planning and regulatory guidance, including the land use and zoning designations and policies, for the approximately 7,077-acre Plan Area. The Project would allow for the future development of residential and non-residential uses. The proposed land use plan also designates public facility uses that are currently existing within the Plan Area, including schools and churches. Additionally, the proposed land use plan would allow for approximately 338.95 acres of park, open space, and ponding basin uses. The Project also includes circulation and utility improvements, some of which are planned in the City's current program for capital improvements.

In Section 3.8, Hazards and Hazardous Materials of the February 2022 DEIR, three sites ([West Shields Elementary School](#), [Golden State Ranch Property](#), and [Parc West Development](#)) are listed within the plan area. A fourth, [Diamond Cleaners](#), is listed as a dry cleaners from at least 1989 to 1996. The facility has potential hazardous materials and contamination on site.

The [West Shields Elementary School](#) and [Golden State Ranch Property](#) are school sites with statuses of No Further Action and No Action Required, respectively. The Parc West Development is not a DTSC site, but a project for which DTSC has previously provided comments in letters dated August 12, 2020 and March 28, 2022. DTSC believes that the Parc West Development was erroneously listed in place of the Westlake Proposed 430 Acre Development (Westlake), which is further discussed in the Hazards and Hazardous Materials section of the EIR.

[Westlake](#) is a DTSC Site with a terminated Voluntary Cleanup Agreement (VCA) and remains a potential concern. The [Phase 1 Environmental Site Assessment Update](#), Proposed Westlake Village, Shields, Grantland, & Garfield Avenues, Fresno, California 93723, prepared by Krazan & Associates, Inc., dated December 13, 2011, listed site development issues that included an approximately 10,000-gallon diesel fuel aboveground storage tank (AST), a liquid fertilizer AST, and two empty fertilizer ASTs. DTSC notes that residential development on the northern portion of the Westlake Site has already begun. This area was identified as Decision Unit Number 2 in the [Workplan for Preliminary Endangerment Assessment, Proposed Westlake Development, DTSC Docket HAS-VCA 13/14-072](#) prepared by Krazan & Associates, Inc., on February 19, 2014. The area was proposed to be assessed for Organochlorine Pesticides in addition to lead and Chlordane based on the past use as orchards and fallow agricultural land. The VCA was terminated prior to DTSC receiving any sampling results.

[Diamond Cleaners](#) is under active investigation by the DTSC Discovery and Enforcement Program (D&E). D&E cannot provide any further comments until further investigations are completed. Diamond Cleaners was identified in the Salem Engineering Group Inc. Phase I Environmental Site Assessment (ESA) Report in

Appendix I – EDR Radius Map Report, dated September 26, 2016, but was not identified as a recognized environmental condition (REC) in the Phase I ESA Report. The dry-cleaning operations handling chlorinated solvents, chemicals of concern, and the lack of soil and/or groundwater investigation information presents a REC and should be addressed and annotated as such.

DTSC recommends and requests consideration of the following comments:

1. DTSC recommends that any parties interested in further developing the Westlake Site enter a Standard Voluntary Agreement (SVA) (formally known as a VCA) to address contamination at brownfields and other types of properties or receive oversight from a [self-certified local agency](#) or Regional Water Quality Control Board. If entering into 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 your [Regional Brownfield Coordinator](#).
2. 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 Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [HHRA NOTE NUMBER 3, DTSC-SLs](#) approved local area baselines or thresholds. If they do not, remedial action must take place to mitigate them below those thresholds. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required.

3. 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 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](#).

DTSC would like to thank you for the opportunity to comment on the DEIR for the West Area Neighborhoods Specific Plan Project. 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,



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HWMP - Permitting Division – CEQA Unit  
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Casey Lauderdale

April 24, 2025

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cc: (via email)

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