



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

June 10, 2024

Ken Strelo

Community Development Director

City of Oakley, Community Development Department

3231 Main Street

Oakley, CA 94561

[mstrelo@ci.oakley.ca.us](mailto:mstrelo@ci.oakley.ca.us)

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BRIDGEHEAD INDUSTRIAL PROJECT, DATED MAY 10 2024 STATE CLEARINGHOUSE NUMBER [2024050471](#)

Dear Ken Strelo,

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Bridgehead Industrial Project (Project). The proposed Project includes the removal of the existing vineyard and associated buildings and subsequent construction of 10 light industrial buildings. This includes 3,000,000 sf of new warehouse space and 72,000 sf of office space, as well as associated internal roadways, parking, landscaping, utilities, and other improvements. The proposed project would require City approval of a General Plan Amendment, Rezone, Tentative Subdivision Map, Master Sign Program, and Design Review. After review of the NOP of a DEIR, DTSC has the following comments for consideration:

1. The Project and future CEQA documents should acknowledge the potential for historic or future activities on or near the Project site to result in the

release of hazardous wastes/substances on the Project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated.

2. The proposed Project site is located in close vicinity to DTSC Hazardous Sites which have documented contamination, land use restrictions, and the proposed Project might be subject to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Please review the project area in [EnviroStor](#), DTSC's public-facing database for further details.
3. DTSC recommends the City of Oakley enter into DTSC's Standard Voluntary Agreement (SVA) program so a proper evaluation of the Project is completed. If entering into an SVA with DTSC, the [FLUXX portal link](#) is provided and the page also has a link to the [Fluxx User Guide](#) that can help you navigate the system. You will need to create a new profile and once in the system, click "Start a Request for Lead Agency Oversight Application." DTSC recommends that once the SVA is signed, a Preliminary Endangerment Assessment Report (PEA Report) be submitted for DTSC review. The PEA Report shall summarize all existing data and provide an evaluation of the possible risk to current and future users of the site. If you have any questions about the application portal, please contact the DTSC Brownfield Coordinator [Gregory Shaffer](#) or contact the [Application Portal Inbox](#)
4. 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](#).

5. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within DTSC's and U.S. Environmental Protection Agency (USEPA) Regional Screen Levels (RSLs) for the intended land use. 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 meets screening levels outlined in the [PEA](#) 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](#).

DTSC believes the City of Oakley must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA. DTSC may provide additional comments on the DEIR as further information becomes available.

DTSC appreciates the opportunity to comment on the 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 any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

*Tamara Purvis*

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