



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

July 24, 2024

Robert Holt

Supervising Planner

City of Fresno

2600 Fresno Street 3rd Floor, Room 3043

Fresno, CA 93721

Robert.Holt@fresno.gov

RE: MITIGATED NEGATIVE DECLARATION FOR THE ENVIRONMENTAL ASSESSMENT NO. T-6352/P21-05405 PROJECT DATED JULY 15, 2024, STATE CLEARINGHOUSE NUMBER [2024070545](#)

Dear Robert Holt,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Environmental Assessment No. T-6352/P21-05405 project (project). The project applicant proposes to develop a 17-lot single family residential subdivision and infrastructure in the project site. The project site is currently zoned as Single-Family Residential, Medium Low Density/Urban Growth Management and the current planned land use designation is Medium Low Density Residential. Therefore, a rezone and General Plan amendment are required.

DTSC recommends and requests consideration of the following comments:

1. 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](#).

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 thresholds. If they are not, remedial action must take place to mitigate them below those thresholds.
3. 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
4. DTSC recommends that all imported soil and fill material should be tested to assess any COCs meet screening levels as outlined in the [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

Robert Holt
July 24, 2024
Page 3

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

DTSC appreciates the opportunity to comment on the MND for the Environmental Assessment No. T-6352/P21-05405 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 [email](#) for additional guidance.

Sincerely,

A handwritten signature in cursive script that reads "Dave Kereazis".

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
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Robert Holt
July 24, 2024
Page 4

cc: (via email)

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