



**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

September 12, 2024

John Doughty  
Assistant City Manager  
City of Half Moon Bay  
501 Main Street  
Half Moon Bay, CA 94019  
[jdoughty@hmbcity.com](mailto:jdoughty@hmbcity.com)

RE: MITIGATED NEGATIVE DECLARATION FOR THE STONE PINE COVE  
AFFORDABLE FARMWORKER HOUSING PROJECT DATED SEPTEMBER 4, 2024,  
STATE CLEARINGHOUSE NUMBER [2024090093](#)

Dear John Doughty,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Stone Pine Cove Affordable Farmworker Housing Project (Project). The Project proposes to develop 46 affordable manufactured homes available to low income and lower income farmworkers, one manager's unit, and one management office on a 6.82-acre portion of a 20.33-acre parcel under the ownership of the City of Half Moon Bay (City). The County of San Mateo and the City are co applicants for the proposed Project. Site access, parking, landscaping, recreation, lighting, and utility improvements are also planned. The Project would require approval of a Parcel Map to divide the subject parcel into three legal parcels. After reviewing the Project, DTSC recommends and requests consideration of the following comments:

1. 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.
2. 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 \(PEA\) 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](#).
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

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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 Stone Pine Cove Affordable Farmworker Housing 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,

*Tamara Purvis*

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

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