



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

December 27, 2024

Gabrielle Myers
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RE: REQUEST FOR EARLY CONSULTATION FOR THE COPPER RIDGE
RESIDENTIAL AND COMMERCIAL PROJECT DATED DECEMBER 23, 2024, STATE
CLEARINGHOUSE NUMBER [2024121093](#)

Dear Gabrielle Myers,

The Department of Toxic Substances Control (DTSC) reviewed the Request for Early Consultation (CON) for the Copper Ridge Residential and Commercial Project (Project). The Project consists of a proposed 650-unit residential subdivision (300- multi-family units and 350-single-family units) and a 5.45-acre Neighborhood Mixed Use site on approximately 83.61 acres. The residential subdivision is proposed to be developed over five phases and the commercial portion to be developed in the fifth phase. The southern portion of the project site, located at APN 014-143-078-000 is currently vacant, but has been graded and was formerly utilized for agricultural crop production. The northern portion of the project site, located on APN 014-143-069-000, is in agricultural production. 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.

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.

2. 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 prior 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 CON for the Copper Ridge Residential and Commercial 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.

Gabrielle Myers
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Sincerely,

Dave Kereazis

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