



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

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**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

February 19, 2025

Robert Holt  
Supervising Planner  
City of Fresno  
2600 Fresno Street 3<sup>rd</sup> Floor, Room 3043  
Fresno, CA 93721  
[Robert.Holt@fresno.gov](mailto:Robert.Holt@fresno.gov)

RE: MITIGATED NEGATIVE DECLARATION FOR ENVIRONMENTAL ASSESSMENT  
NO. T-6475/P24-02520 DATED FEBRUARY 10, 2025, STATE CLEARINGHOUSE  
NUMBER [2025020247](#)

Dear Robert Holt,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for Environmental Assessment No. T-6475/P24-02520 (Project). The Project is approximately 5.42 acres and will subdivide the property into a 53-lot single-family residential subdivision. On- and off-site improvements including circulation roads, interior local streets, curb, gutter, sidewalk, water and sewer utilities, and landscaping would be developed to City standards by the Project developer. The subject property has past agricultural use and has the potential for contaminated soil therefore, 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 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.

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 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 MND for Environmental Assessment No. T-6475/P24-02520. 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.

Robert Holt  
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Sincerely,

*Dave Kereazis*

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