



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

June 26, 2025

Katerina Mahdavi
Planner I
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403
Katerina.Mahdavi@sonoma-county.org

RE: MITIGATED NEGATIVE DECLARATION FOR MNS21-0002 MIDDLE TWO ROCK MINOR SUBDIVISION DATED JUNE 24, 2025, STATE CLEARINGHOUSE NUMBER [2025021012](#)

Dear Katerina Mahdavi,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for MNS21-0002 Middle Two Rock Minor Subdivision (Project). The proposed Project is a request for a Minor Subdivision to subdivide an existing 41.55-acre lot into four lots of 10.73 acres, 10.32 acres, 10.24 acres, and 10.26 acres in size located at 2485 Middle Two Rock Road, Petaluma. The resulting lots will be served by private Well and Septic Systems. No development is proposed. 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 local

Katerina Mahdavi

June 26, 2025

Page 2

area baselines or 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.

DTSC would like to thank you for the opportunity to comment on the MND for the MNS21-0002 Middle Two Rock Minor Subdivision. 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.

Sincerely,

Tamara Purvis

Tamara Purvis

Associate Environmental Planner

HWMP - Permitting Division – CEQA Unit

Department of Toxic Substances Control

Tamara.Purvis@dtsc.ca.gov

Katerina Mahdavi

June 26, 2025

Page 3

cc: (via email)

Governor's Office of Land Use and Climate Innovation

State Clearinghouse

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Joshua Melcon

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