



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

Katherine M. Butler, MPH, Director  
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Sacramento, California 95826-3200  
[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

July 18, 2025

Derik Michaelson  
Planner III  
Permit Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403  
[derik.michaelson@sonomacounty.gov](mailto:derik.michaelson@sonomacounty.gov)

RE: MITIGATED NEGATIVE DECLARATION FOR BENNETT VALLEY SUBDIVISION -  
PLP25-0014 (MNS15-0005) PROJECT DATED JULY 15, 2025, STATE  
CLEARINGHOUSE NUMBER [2025070611](#)

Dear Derik Michaelson,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for Bennett Valley Subdivision - PLP25-0014 (MNS15-0005) (Project). The Project is a Minor Subdivision with Use Permit creating four separate parcels on 50.99 acres. The three new parcels on 11.51 acres (Lot 1), 10 acres (Lot 2), and 19.47 acres (Lot 3) will have the potential for single-family development. The fourth parcel (Lot 4) will remain in residential use on the remaining 10 acres. and type conversion (removal) with required replacement of 1.55 acres of Oak Woodland habitat. DTSC recommends and requests consideration of the following comments:

1. When agricultural crops and/or land uses are proposed or rezoned for residential use, several 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 approved local 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. These recommendations should be adhered to and become part of the environmental document. Please refer to the [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#) for the most updated guidance and screening levels.

2. All imported soil/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/fill material, there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

DTSC would like to thank you for the opportunity to comment on the MND for Bennett Valley Subdivision - PLP25-0014 (MNS15-0005). 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

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