



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

August 01, 2025

Jacob Pahule
Assistant Planner
San Joaquin County Community Development Department
1810 East Hazelton Avenue
Stockton, CA 95205
jpahule@sjgov.org

RE: MITIGATED NEGATIVE DECLARATION FOR VARIANCE NO. PA-2400223 AND
MAJOR SUBDIVISION NO. PA-2300266 DATED JULY 30, 2025, STATE
CLEARINGHOUSE NUMBER [2025071277](#)

Dear Jacob Pahule,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for Variance No. PA-2400223 and Major Subdivision No. PA-2300266 (Project). The Project is comprised of two applications: Variance No. PA-2400223 to reduce the minimum lot size in the AG-40 (General Agriculture, 40-acre minimum) zone from 40 acres to 2 acres; and a Major Subdivision No. PA-2300266 to subdivide two legal parcels totaling 14.77-acre parcel into 6 parcels and a Designated Remainder each a minimum of 2 acres. The Project site currently contains a single-family residence. While the applicant is not proposing to construct any additional dwellings or structures, the resulting subdivision would allow for an additional single-family residence and an accessory dwelling on each of the newly created lots. Access to the proposed lots will be provided via a proposed access easement. 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 soil/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 is 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 Variance No. PA-2400223 and Major Subdivision No. PA-2300266 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.

Jacob Pahule
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Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
state.clearinghouse@lci.ca.gov

Josh Elson
Project Applicant
Baumach & Piazza
jelson@bpengineers.net

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov