



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
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SENT VIA ELECTRONIC MAIL

May 12, 2026

Jonnie Hanson Lan
Community Development Director
City of Atwater
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Atwater, CA 95301
jan@atwater.org

RE: MITIGATED NEGATIVE DECLARATION FOR CASTLE FAMILY HEALTH CENTER
("ATWATER CLINIC") (RSO 0277-25, SP 25-21-0100, REZ 25-21-0200, GPA 25-21-
0300, LM 25-21-0400, AND AR 25-21-0500) DATED MAY 1, 2026, STATE
CLEARINGHOUSE NUMBER [2026050034](#)

Dear Jonnie Hanson Lan,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for Castle Family Health Center ("Atwater Clinic") (RSO 0277-25, SP 25-21-0100, REZ 25-21-0200, GPA 25-21-0300, LM 25-21-0400, and AR 25-21-0500) (Project). The Project would modify an existing medical facility site, resulting in approximately 14,800 square feet of building area, 83 parking spaces, 56,300 square feet of impervious surface area (parking lot, walkways, buildings), 27 exam rooms, and other site modifications including pedestrian pathways, bike parking, landscaping, trash enclosure, and a secure outdoor staff area.

DTSC performed a review of a Phase I Environmental Site Assessment (Phase I ESA) for the property located at 1775 Third Street, Atwater, California (Site). The Site is identified as [Castle Family Health Centers at Atwater](#) in DTSC's EnviroStor database. According to the Phase I ESA, the Site consists of four adjoining parcels totaling approximately 1.6 acres identified by Merced County Assessor Parcel Numbers (APN) :002-132-021, 002-132-022, 002-132-024, and 002-132-025. Aerial photographs

provided in the Phase I ESA indicate that structures were present from at least 1937 through at least 1984. By 1998, the Site had been redeveloped with the current building, paved parking lot and landscaped areas. Lead-based paints were historically applied to structures prior to their ban in 1978 and organochlorine pesticides (OCPs), such as termiticides, were commonly applied to soils around structures prior to their ban in the 1970s. DTSC recommends and requests consideration of the following comments:

1. Based on the proposed development at and around APN: 002-132-022-000, DTSC recommends evaluating Site soils for the potential presence of lead and OCPs. The City of Atwater 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 other outbuildings and should be sampled and analyzed. 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 recent guidance and screening levels.
2. In the event a release is identified within the Project area, DTSC recommends the City of Atwater deem the Site is safe for construction and the proposed use and address the contaminations within the Project area through oversight from a [self-certified local agency](#), DTSC or Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: [Request for Agency Oversight Application](#). Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have any questions about the application portal, please contact the relevant [Regional Brownfield Coordinator](#) for your Project.

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3. DTSC recommends all imported soil/fill material be tested to ensure all COCs meet screening levels as outlined in [DTSC's PEA Guidance Manual](#). Furthermore, 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.
4. Surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).

DTSC would like to thank you for the opportunity to comment on the MND for the Castle Family Health Center. 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,



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cc: (via email)

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