



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 4, 2026

Shante Ruiz
Assistant Planner
Stanislaus County Planning and Community Development
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RE: REQUEST FOR EARLY CONSULTATION FOR THE PARCEL MAP APPLICATION
NO. PLN2026-0027 - HUDELSON LAND COMPANY, L.P. DATED MAY 29, 2026,
STATE CLEARINGHOUSE NUMBER [2026051258](#)

Dear Shante Ruiz,

The Department of Toxic Substances Control (DTSC) reviewed the Request for Early Consultation (CON) for the Parcel Map Application No. PLN2026-0027 - Hudelson Land Company, L.P. (Project). The proposed Project is a request to subdivide an approximately 110.8-acre parcel into two approximate 55.4-acre parcels in the General Agriculture zoning district. The site is currently improved with a 3,016 square-foot single-family dwelling, a detached garage, a shed, ground mount solar array and approximately 104 acres of almond orchards. If approved, an irrigation easement will be required to be granted for any infrastructure serving both parcels. If approved, proposed Parcel 1 may be further developed with a second dwelling unit and one Junior Accessory Dwelling Unit (JADU); the second dwelling unit may be either a single-family dwelling or an Accessory Dwelling Unit (ADU). Proposed Parcel 2 may be developed with up to two dwelling units and one JADU; the second dwelling unit may be either a single-family dwelling unit or an ADU. 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 recent guidance and screening levels.
2. DTSC recommends all imported soil/fill material be tested to ensure all COCs meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Furthermore, 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 sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.
3. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, 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 Guidance Manual](#).

4. The Stanislaus County Planning and Community Development Department should consider soil testing as mentioned in comment #1. If, in the event any COC results are above DTSC residential screening levels, DTSC recommends the department address the contaminations within the Project area through an Environmental Site Assessment and/or receive 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.

DTSC would like to thank you for the opportunity to comment on the CON for the Parcel Map Application No. PLN2026-0027 - Hudelson Land Company, L.P. 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,



Dave Kereazis
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HWMP - Permitting Division – CEQA Unit
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Shante Ruiz
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cc: (via email)

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