



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

August 8, 2024

Olivia Ervin  
Principal Environmental Planner  
City of Petaluma Planning Division  
11 English Street  
Petaluma, CA 94952  
[oervin@cityofpetaluma.org](mailto:oervin@cityofpetaluma.org)

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CREEKWOOD HOUSING DEVELOPMENT PROJECT DATED JULY 25, 2024, STATE CLEARINGHOUSE NUMBER [2022100452](#)

Dear Olivia Ervin,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the Creekwood Housing Development Project (Project). The proposed Project includes demolition of the on-site residence at 280 Casa Grande Road, retention of the existing residence at 270 Casa Grande Road, and development of 62 new residential dwelling units and associated improvements. In addition, the Project would include construction of various on-site road and utility improvements, landscaping, and a new off-site public multi-use pathway, with a pedestrian bridge connection over Adobe Creek. The Project requires City approval of a Vesting Tentative Parcel Map, Site Plan and Architectural Review, and a Tree Removal Permit. In addition, the Project is expected to require Federal Emergency Management Agency approval of a Conditional Letter of Map Revision, California Department of Fish and

Wildlife approval of a 1600 Lake and Streambed Alteration Agreement, and Regional Water Quality Control Board approval of National Pollutant Discharge Elimination System Phase II MS4.

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 thresholds. If they are not, remedial action must take place to mitigate them below those thresholds.
2. 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.
3. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) 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 and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional

information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

4. 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 PEA Guidance Manual](#).

DTSC appreciates the opportunity to comment on the Creekwood Housing Development Project. 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 any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,



Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
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Olivia Ervin  
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cc: (via email)

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