



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630



**Gavin Newsom**  
Governor

October 7, 2019

Governor's Office of Planning & Research

**OCT 07 2019**

### STATE CLEARINGHOUSE

Ms. Olivia Pimentel  
Assistant Planner  
City of Kerman  
850 South Madera Avenue  
Kerman, California 93630

RESPONSE TO COMMENTS, FINAL FOCUSED ENVIRONMENTAL IMPACT  
REPORT FOR REORGANIZATION 2018-01 WHITEBRIDGE/SISKIYOU PROJECT,  
KERMAN.

Dear Ms. Pimentel:

The Department of Toxic Substances Control (DTSC) reviewed the Final Focused Environmental Impact Report (Final Focused EIR) (September 2019, Crawford & Bowen Planning, Inc.) for the Reorganization 2018-01 (Whitebridge/Siskiyou) Project (Site). The Final Focused EIR provides a response to DTSC's comments sent on June 10, 2019.

DTSC disagrees with the response to DTSC's comments which states that additional remediation measures are not warranted at the Site based on the finding of the Phase I Environmental Site Assessment (ESA) (August 2019, See's Consulting & Testing, Inc).

The ESA identifies that the Site was used for farming from at least 1930s to 2018 but fails to evaluate the potential releases of organochlorine pesticides (OCPs) and metals as a result of the application of these chemicals in farmlands. OCPs and metals should be identified as potential chemicals of concern for the Site and investigation at the Site should be recommended.

DTSC strongly recommends that the Site be investigated and remediated (if needed) in accordance with DTSC's Proven Technologies and Remedies Guidance, Remediation of Organochlorine Pesticides in Soil, which can be found at [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/OCP\\_022610\\_final-2.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/OCP_022610_final-2.pdf).

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DTSC appreciates the opportunity to review the Final Focused EIR. Should you need any assistance in the environmental investigation, please submit a request for Lead Agency Oversight Application which can be found at:

<https://dtsc.ca.gov/brownfields/voluntary-agreements-quick-reference-guide/>.

Should you have any questions regarding this letter, please contact me at (714) 484-5392 or by e-mail at [chiarin.yen@dtsc.ca.gov](mailto:chiarin.yen@dtsc.ca.gov).

Sincerely,



Chia Rin Yen  
Environmental Scientist  
Brownfields Restoration and School Evaluation Branch  
Site Mitigation and Restoration Program

ar/cy/yg

cc: (via e-mail)

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Schools Evaluation and Cleanup Team Reading File – Cypress Office