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Public Comments

Pridmore Property
General Plan Amendment P17-00135
Rezone P20-00223 and Use Permit P20-00222
Planning Commission Hearing May 15, 2024



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

May 1, 2024

Emily Hedge

Planner III

County of Napa

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RE: NEGATIVE DECLARATION (ND) FOR THE PRIDMORE PROPERTY GENERAL PLAN MAP AMENDMENT, REZONING, AND USE PERMIT PROJECT, DATED APRIL 25, 2024, STATE CLEARINGHOUSE NUMBER [2024041065](#)

Dear Emily Hedge,

The Department of Toxic Substances Control (DTSC) received a ND for the Pridmore Property General Plan Map Amendment, Rezoning, and Use Permit (project). For the project, the Planning Commission will make the following recommendations to the Board of Supervisors: 1. Adopt a resolution for a General Plan Amendment to change the property's General Plan land use designation from Agricultural, Watershed and Open Space (AWOS) to Urban Residential (UR) to facilitate rezoning to Commercial Limited (CL); 2. Adopt an ordinance changing the property's zoning district from Agricultural Watershed (AW) to CL; and 3. Approve a new Use Permit for a small, short-term rental lodging facility consisting of: nine lodging units, one caretaker unit, and Accessory buildings such as guest check-in, office, and storage, a barn area, and improvements to existing water and wastewater system infrastructure. The project also

proposes improvements to the existing driveway and parking lot and to existing recreation facilities including landscaping. After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within DTSC's and U.S. Environmental Protection Agency (USEPA) Regional Screen Levels (RSLs) for the intended land use. 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 meets screening levels outlined in the [PEA](#) 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.
2. When agricultural crops and land uses are rezoned for residential use, a number of contaminants of concern 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 Dichlorodiphenyltrichloroethane (DDT), toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet [Human Health Risk Assessment Note Number 3](#) approved thresholds outlined in the [PEA Guidance Manual](#). If they do not, remedial action must take place to mitigate them below those thresholds. For boring and analyses recommendations under 50 acres, refer to [DTSC Interim Guidance for Sampling Agricultural Properties](#); otherwise contact DTSC for approval over 50 acres.
3. Additional chemicals of concern may be found in mixing/loading/storage area, 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 (PAHs) and/or Total Petroleum Hydrocarbons (TPHs) may be required.

4. Due to the Zone reclassification change of AW to CL and AWOS to UR, a site and/or soil assessment should be completed to determine if any Recognized Environmental Conditions (REC's) are present. This may require a Phase I Environmental Site Assessment and oversight from DTSC or a certified [local agency resource](#). If opting for DTSC oversight, enter into DTSC's Standard Voluntary Agreement (SVA) program so a proper evaluation of the Project is completed. The [FLUXX portal link](#) is provided and the page also has a link to the [Fluxx User Guide](#) that can help you navigate the system. You will need to create a new profile and once in the system, click "Start a Request for Lead Agency Oversight Application. If you have any questions about the application portal, please contact the DTSC Brownfield Coordinator [Gregory Shaffer](#) or contact the [Application Portal Inbox](#).

DTSC appreciates the opportunity to comment on the ND for the Pridmore Property General Plan Map Amendment, Rezoning, and Use Permit 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,



Dave Kereazis
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Emily Hedge
May 1, 2024
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cc: (via email)

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