



December 15, 2025

Dave Kereazis,
Associate Environmental Planner
California Department of Toxic Substances Control
HWMP-Permitting Div., CEQA Unit
8800 Cal Center Dr.
Sacramento, CA 95826-3200
Dave.Kereazis@dtsc.ca.gov

*Re: Response to DTSC Comments on IS/MND for Catavina Residential
Development Project (City of Palm Desert), SCH No. 2025091375*

Dear Mr. Kereazis:

We are Blue Fern Development, applicant on the Catavina residential development project (the "Project") currently being processed through the City of Palm Desert (the "City").

In preparation of the Final Initial Study/Mitigated Negative Declaration for the Project (the "IS/MND"), we directed our soils consultant, Geo Tek, to examine and respond to the comment letter, dated October 3, 2025, that you submitted on DTSC's behalf regarding potential soil contamination at the Project site. That response, with input from City staff, has now been incorporated into the Final IS/MND. We have attached a copy of the response for your review.

In your comment letter, you recommended that the Project's soil be tested to determine whether it contained arsenic and organochloride pesticides and herbicides. Based on the Phase I Environmental Site Assessment (ESA) that Geo Tek conducted for the Project, there was no indication that compounds containing arsenic or organochlorides had been used at the subject property. Nevertheless, out of an abundance of caution, we recently instructed Geotek to take soil samples from the site and have them tested for organochlorides and arsenic, as suggested in your comment letter. We are happy to report that the test results show that neither organochlorides nor arsenic pose a threat to workers or future residents of the Project. Specifically, all samples were Non-Detect (ND) for organochloride pesticides and herbicides. Of 20 samples tested for arsenic, 18 were ND. The remaining two samples showed arsenic concentrations at 3.1 micrograms per kilogram (mg/kg) and 3.6 mg/kg, respectively. While these concentrations exceed the screening level of .032 mg/kg, they are well below arsenic concentrations that naturally occur in the soils of Riverside County and Southern California, generally – a fact acknowledged by DTSC in its own guidance documents. Geo Tek explains the issue as follows:



The concentration of the metal arsenic in two (2) of the soil samples was detected above screening levels for residential soils, as determined by the Department of Toxic Substance Control (DTSC). However, the EPA and the DTSC have acknowledged that naturally occurring arsenic in southern California typically exceeds the maximum screening level, with levels recorded up to 12 mg/kg in many areas (Human Health Risk Assessment (HHRA) Note Number 11 - Southern California Ambient Arsenic Screening Level). The test results for all of the soil samples are below the typically detected levels of naturally occurring arsenic in the southern California area.

(Geo Tek Soils Report, 12/11/25, p. 4)

Based on these findings, the IS/MND's no significant impact conclusion regarding hazardous substances remains valid and supported by substantial evidence.

If you disagree with our position and still hold that further study of the Project's soil is required, please notify us by January 4, 2026. Thank you for your attention and your interest in the Catavina project.

Sincerely,

Shane Bouchard
Shane Bouchard (Dec 15, 2025 13:14:56 PST)
Shane Bouchard

Enclosures

Cc: Carlos Flores, Deputy Director of Development Services
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L-Freeburn Responding to DTSC Comments (12-15-25)

Final Audit Report

2025-12-15

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