

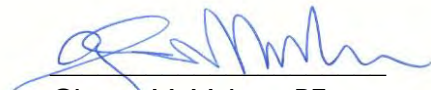
**Phase I Environmental Site Assessment
7137 Auburn Road
Citrus Heights, Sacramento County, California**

Prepared for:

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
APN	Assessor's Parcel Number
DTSC	Department of Toxic Substances Control
EDR	Environmental Data Resources
EMD	Sacramento County Environmental Management Department
ESA	Environmental Site Assessment
pCi/L	pico curies per liter
REC	recognized environmental condition
UST	underground storage tank

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1 EXECUTIVE SUMMARY

Dudek conducted this Phase I Environmental Site Assessment (ESA) for the 11.5-acre property located within assessor's parcel number (APN) 211-0020-002-000 in the City of Citrus Heights, California (subject property) (Figure 1, Project Location). This Phase I ESA was conducted for the City of Citrus Heights (City) as a part of due diligence for acquisition of the subject property. The subject property is located northeast of Interstate (I) 80 and can be accessed from the east via Auburn Boulevard (Blvd).

The findings of this investigation are based on historical sources, information contained in regulatory agency databases, available local regulatory agency records, interviews with site representatives, and a site reconnaissance.

Information gathered for this report indicated the following:

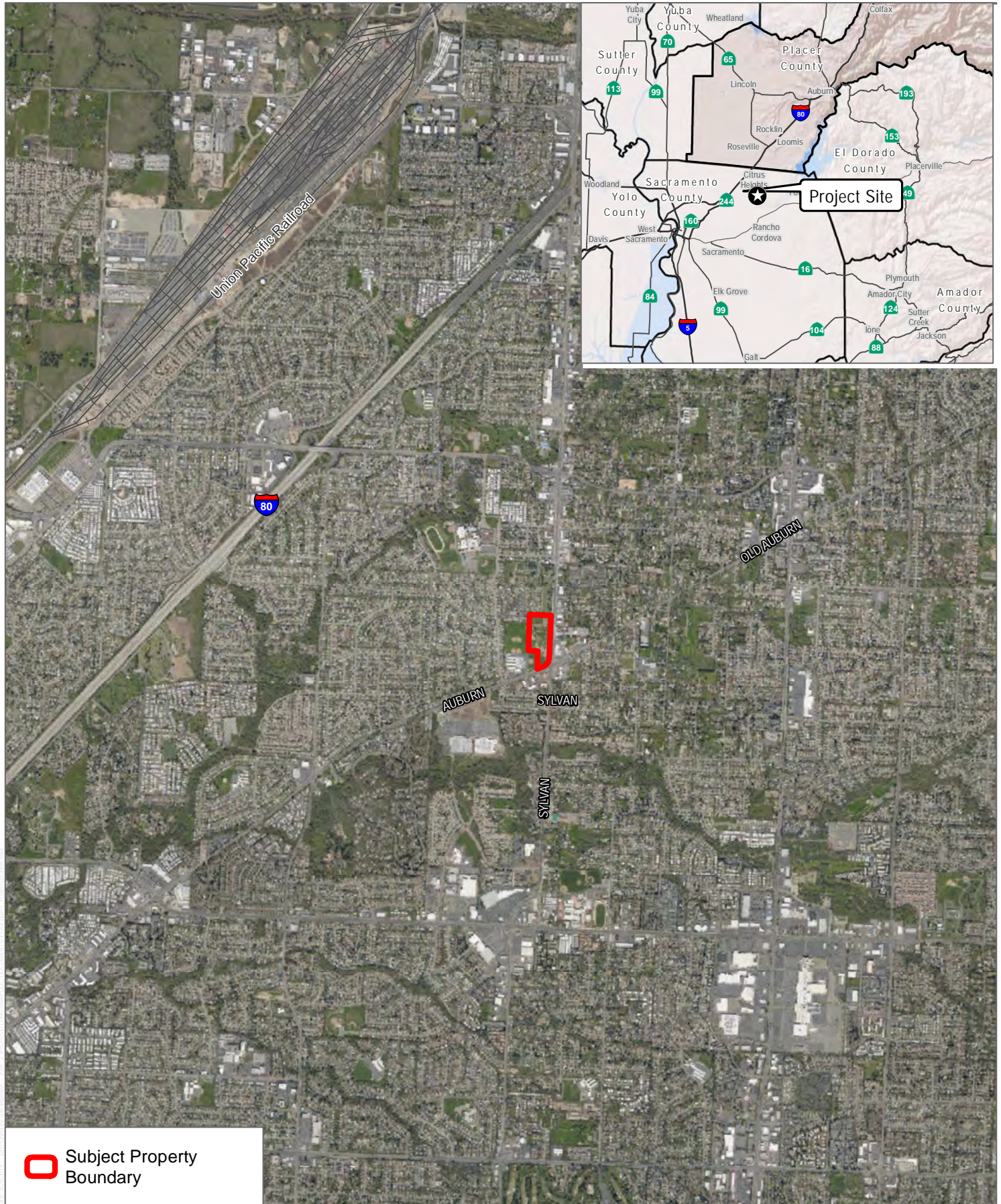
- Based on the review of aerial photographs, historical topographic maps, site representative interviews and local agency records, the subject property was used as Sylvan Middle School from at least 1902 until the school buildings and utilities were demolished in 2016.
- The subject property currently consists of primarily vacant land partly covered with trees; Sylvan Corners Public Plaza (plaza) occupies the southeast corner and is a part of Sylvan Corner Village Square (a commercial intersection consisting of lamp posts, bench, trash receptacle, trees and shrubs). During the preparation of this Phase I ESA the County corrected their GIS database to reflect that the plaza is part of the City's right-of-way. As this report was in progress when this correction was made, the plaza was retained as part of the subject property for the purposes of this report.
- Two storm drains, located in northwest and southeast corner of the subject property, were identified during the site reconnaissance. Small patches of distressed vegetation, debris including residual asphalt/concrete, wood, tile, pipes, and metal associated with recent demolition of the former school buildings and utilities, were encountered in small quantities mixed with the surface soils.
- According to the 2016 demolition plans provided to the City by the current owner, three septic tanks, transite pipes and one grease trap were located on the subject property. The grease trap was reportedly removed and excavation pit was backfilled with native soil. The septic tanks were reportedly abandoned in place. The transite piping (asbestos-cement pipe) was reportedly removed and disposed of offsite; however, Dudek has not received confirmation of this information.

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- The subject property is bound by Auburn Blvd and commercial properties to the east, single family residential units to the south and northwest, Sylvan Middle School to the southwest, Sylvan Cemetery District to the north, and athletic fields (used for former Sylvan Middle School) to the west.
- The subject property was identified in the following regulatory databases: HAZNET, NPDES, CIWQS, HIST UST, SACRAMENTO CO. ML. The listings are associated with the former Sylvan Middle School. Based on the information for the HAZNET listing, approximately 65 tons of asbestos containing wastes were removed and disposed of in an off-site landfill in 2004. In addition, small quantities of laboratory chemical wastes were disposed of offsite. No violations or report of unauthorized releases were recorded.
- Based on the records reviewed and visual observations during site reconnaissance, it is unlikely that adjacent or surrounding properties have impacted the environmental conditions at the subject property.

This assessment did not reveal evidence of RECs, HRECs, or CRECs. Thus, no further investigation appears warranted at this time. Dudek identified items of concern, which are discussed in Section 12.

Dudek performed this Phase I ESA of the subject property in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E1527-13. This report summarizes the research and findings of the Phase I ESA.



SOURCE: USDA 2016, CA State Parks 2018

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2 INTRODUCTION

This Phase I ESA was performed according to the guidelines stipulated in the ASTM Standard E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM 2013).

The subject property is located within APN 211-0020-002-000 at 7137 Auburn Boulevard (Blvd) in the City of Citrus Heights, California (Figure 1, Project Location, and Figure 2, Subject Property). The subject property was formerly Sylvan Middle School from approximately 1902 to 2016. This Phase I ESA was conducted for the City of Citrus Heights as part of environmental due diligence for acquisition of the subject property.

2.1 Assessment Procedure and Scope of Investigation

Phase I ESAs assist in identifying past and present land use, including identification of possible releases or disposal of manufacturing or other wastes if such information is contained within regulatory reports or files, and/or is currently visible on the subject property. The assessment reviews local, county, state, and U.S. Environmental Protection Agency lists of known or potentially hazardous waste sites, landfills, and sites currently under investigation for environmental violations that may be of concern to a site.

The scope of this environmental investigation consisted of (1) a reconnaissance of the subject property; (2) a search of regulatory agency records; (3) review of available historical aerial photographs, topographic maps, Sanborn fire insurance maps, City Directory listings, and building department records; (4) an environmental lien search; (5) interview of a representative of the property owner; and (6) preparation of this Phase I ESA report detailing the findings of the investigation.

These activities were conducted to identify recognized environmental conditions (RECs). The term “recognized environmental condition” means the presence or likely presence of any hazardous substances or petroleum products on the subject property under conditions that indicate an existing release, a past release, or a material threat of a future release into the ground, groundwater, or surface water.

The term “controlled recognized environmental condition” (controlled REC or CREC) is an environmental condition that would have been considered a REC in the past, but which has been remediated and received risk-based closure by a regulatory agency (i.e., no further action letter) where residual contamination remains in place. Furthermore, the term controlled REC is used if the property is subject to a control or use restriction (i.e., property use restrictions, activity and use limitations, institutional controls, or engineering controls) due to residual on-site contamination.

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The term “historical recognized environmental condition” (historical REC or HREC) is an environmental condition that would have been considered a REC in the past, but which has been remediated and received unrestricted residential use closure by the regulatory agency. Therefore, no controls or use restrictions have been applied to the property.

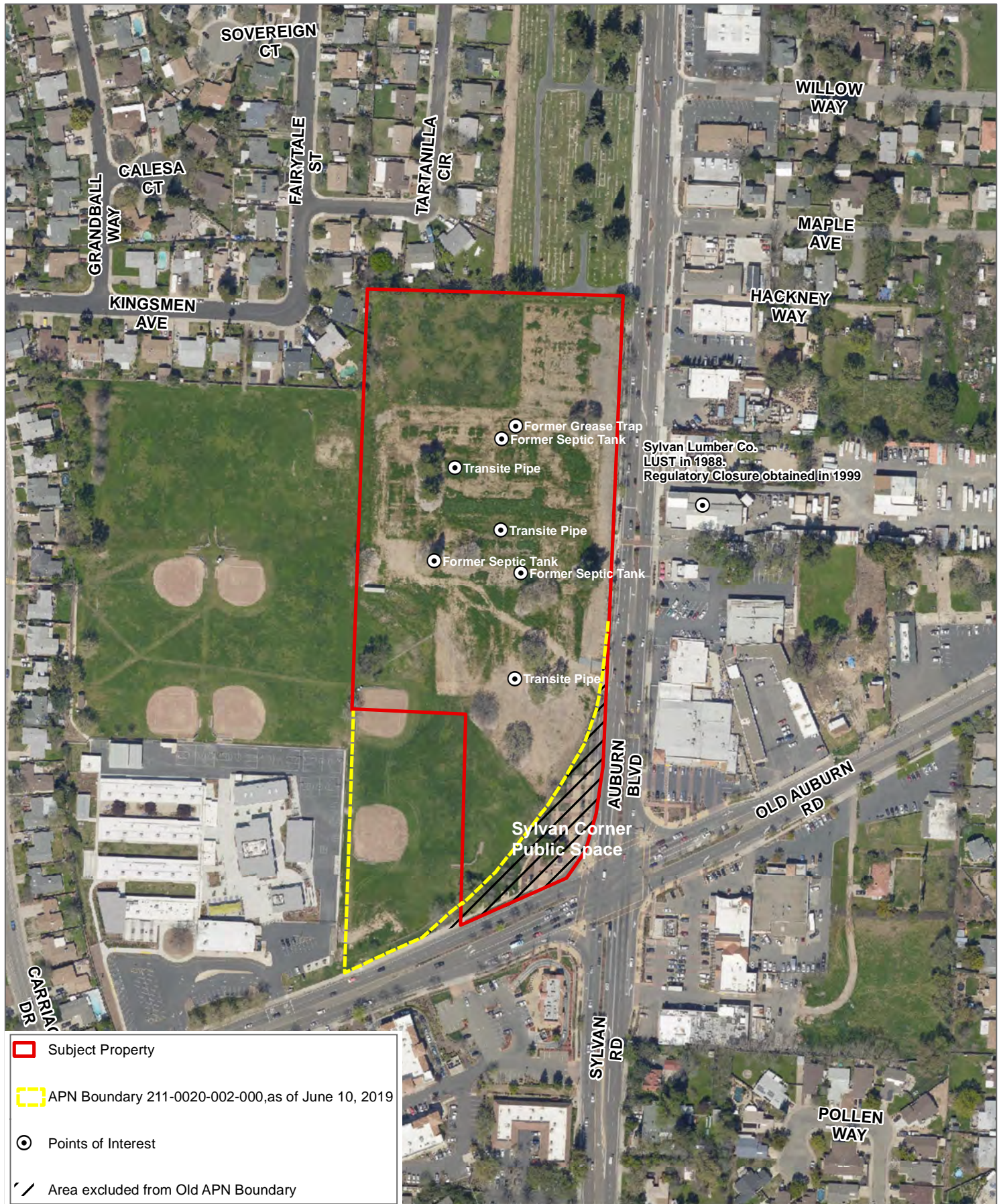
The term “recognized environmental condition” is not intended to include de minimis conditions. De minimis conditions are conditions that generally do not present a material risk of harm to public health or the environment, and thus would not be the subject of an enforcement action if brought to the attention of governmental agencies.

2.2 Qualifications of Environmental Professionals

This Phase I ESA was prepared by Divya Khandelwal, environmental engineer; Johnathan Martin, hydrogeologist; Audrey Herschberger, environmental engineer; and Glenna McMahon, environmental engineer. Qualifications for Ms. Herschberger, Ms. Khandelwal, Mr. Martin, and Ms. McMahon are presented in Appendix A, Qualifications of Environmental Professionals.

The following statement is made by the environmental professionals:

I declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in Section 312.10 of 40 Code of Federal Regulations 312. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 Code of Federal Regulations Part 312.



SOURCE: USDA 2016

FIGURE 2

Subject Property

7137 Auburn Boulevard - Phase I ESA

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3 SITE LOCATION

The subject property is approximately 11.5 acres of land within APN 211-0020-002-000 located northwest of intersection of the Old Auburn Road and Auburn Blvd in Citrus Heights, Sacramento County, California (Figure 2).

During the preparation of this report, the boundary of APN 211-0020-002-000 was corrected by the County (Assessor Map Book 211, Page 002, on June 10, 2019) to exclude the Sylvan Corner Public Plaza located in the southeast corner of the subject property, at the northeast corner of the intersection of Old Auburn Road and Auburn Blvd. However, for this report, Sylvan Corner Public Plaza was retained as part of the subject property as shown in Figure 2. There is also an approximate 2.2-acre portion of the southwest section of APN 211-0020-002-000 that is not part of the subject property (Figure 2).

The subject property can be accessed on the east side via Auburn Blvd. The subject property is currently a vacant land partly covered with natural vegetation, except for the plaza, which is a part of Sylvan Corner Village Square (a public space consisting of lamp posts, bench, trash receptacle, trees and shrubs) (Figure 2; Appendix E, Site Photographs, Photograph 2). Sylvan Middle School is located southwest of the subject property. Commercial properties are located along Auburn Blvd and Sylvan Road, and residential properties lie beyond to the south. The western adjacent property is an athletic field (from former Sylvan Middle School), and properties farther westward and northwestward are primarily residential. Sylvan Cemetery District is adjacent to the subject property to the north.

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4 ENVIRONMENTAL SETTING

The subject property is located west of the Sierra Nevada Mountain Range, in the City of Citrus Heights, California.

General topographic information for the subject property and the surrounding area was obtained from a review of topographic maps (Appendix B, Historical Topographic Maps), and from the site reconnaissance (Section 6). The subject property is at an elevation of approximately 163 feet above mean sea level. The land gradually slopes toward the west-southwest.

No subsurface geologic investigations were performed as part of this Phase I ESA. According to the EDR Report (Appendix K, Regulatory Database Search Report), the subject property is underlain by Cenozoic Era, Quaternary Series rock stratigraphic unit. Soils beneath the subject property are mapped primarily as urban land, which have variable texture and are classified as well drained.

According to the EDR report, no wetlands and flood zones are identified on or within 0.25 miles of the subject property (Appendix K).

The subject property is not identified within the Very High Fire Hazard Severity Zones for Sacramento County (CAL FIRE 2019).

According to the California Energy Commission, a 60-kilovolt transmission power lines, owned by Sacramento Municipal Utility District, runs along Old Auburn Road; it is located approximately 200 feet south of the subject property (CEC 2019).

Based on sources searched by EDR, no public water supply wells, water wells, or oil and gas wells were identified on the subject property. Thirteen water wells were identified within 1 mile of the subject property. Groundwater depth and gradient information was not available. One plugged oil and gas well was identified approximately 0.8 miles northwest of subject property.

Dudek also received portions of the Commercial Resale Property Disclosure Report, prepared by JCP-LGS on June 25, 2019, as provided by the City of Citrus Heights. The report summarized tax and natural hazard information for the subject property, a checklist of environmental hazards/sites on and near the subject property (City of Citrus Heights 2019). Much of the information provided in this report is a snapshot of the more detailed information provided in this Phase I ESA report.

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5 INTERVIEWS

5.1 Site Representative Interview

Dudek sent a Property Background Information Questionnaire to the City, requesting that it be completed by the subject property owner or owner's representative with the most historical knowledge of the subject property. Mark Van Allen and Frank Camarda, representatives of the San Juan Unified School District, responded separately to the questionnaire (Appendix C, Site Representative Interviews). Mr. Van Allen also responded to follow-up questions posed by Dudek regarding septic tank and hazardous waste generators reports for the subject property (Appendix C).

Information provided by Mr. Van Allen and Mr. Camarda is summarized below:

- The subject property has been an empty lot since 2016.
- The subject property was used as Sylvan Middle School, which was owned by San Juan Unified School District. Sylvan School District merged with San Juan Unified School District (current owner) in 1960.
- Mr. Camarda stated paint containers greater than 5 gallons were stored on the subject property.
- Mr. Van Allen stated that the previous Sylvan Middle School had a science class where small amounts of hazardous waste substances may have been stored.
- An asbestos and/or lead based paint survey was conducted at the subject property before the total demolition of the buildings and associated infrastructure.
- Pesticides/Herbicides (Roundup) has been applied at the subject property.
- The subject property has previously maintained Safety Data Sheets, a Community Right-to-Know Plan, and hazardous waste generators reports (i.e., hazardous wastes manifests). A geotechnical report was completed for the subject property.
- Mr. Van Allen responded to follow up questions on June 24, 2019, informing that the hazardous waste reports for the subject property were for asbestos and lead-based paint materials. Mr. Van Allen also stated that there was a septic tank on the subject property, which was removed during demolition.
- There are no known environmental liens against the subject property; no known activity and land use limitations in place at the subject property; no known pending, threatened, or past litigation or administrative proceedings related to hazardous materials against the subject property; and there are no obvious indicators that point to the presence or likely presence of contamination on the subject property.

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Dudek requested copies of the referenced reports and plans; however, these documents have not been received as of the date of this report.

5.2 User-Provided Information

In accordance with ASTM Standard E 1527-13, to qualify for one of the Landowner Liability Protections offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001, the user must provide the following information (if available) to the environmental professional (ASTM 2013). Dudek sent the following questions to the City, the user of this report. On June 6, 2019, the following responses were received via email from Alison Bermudez, representative of City of Citrus Heights:

1. **Question:** Are you aware of any environmental cleanup liens against the property that are filed or recorded under federal, tribal, state, or local law?

Response: *None known.*

2. **Question:** Are you aware of any activity and land use limitations, such as engineering controls, land use restrictions, or institutional controls that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state, or local law?

Response: *None known.*

3. **Question:** As the user of this ESA, do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?

Response: *Local Government is the potential purchaser of this property. Citrus Heights has knowledge of this property including its former use.*

4. **Question:** Does the purchase price being paid for this property reasonably reflect the fair market value of the property? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?

Response: *Yes, an appraisal was completed and purchase price is fair market value.*

5. **Question:** Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases? For example, as user, a) Do you know the past uses of the property, b) do you know of specific chemicals that are present or once were present at the property, c) do you know of spills or other chemical releases that have taken

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place at the property, d) or do you know of any environmental cleanups that have taken place at the property?

Responses:

- a. *The past use of property is known.*
- b. *None known.*
- c. *None known.*
- d. *None known.*

6. **Question:** As the user of this ESA, based on your knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of contamination at the property?

Response: A previous employee of the school district (current owner) has mentioned the possibility of an old septic tank being located on the property.

5.3 Local Agency Records

5.3.1 CalEPA Regulated Site Portal

Dudek reviewed the California Environmental Protection Agency (CalEPA) Regulated Site Portal, which combines data about environmentally regulated sites and facilities in California (CalEPA 2019). Data sources for the portal include California Environmental Reporting System, Department of Toxic Substances Control (DTSC) EnviroStor, State Water Resources Control Board (SWRCB) GeoTracker, SWRCB California Integrated Water Quality System, and the Federal Toxics Release Inventory.

CalEPA sites are generally administrative in nature, identifying sites that have environmental permits or that handle hazardous materials or generate hazardous waste, but do not necessarily have an unpermitted release of hazardous substances to the environment.

The subject property was not identified in the CalEPA database. The following eight sites were identified in the CalEPA database within 0.5 miles of the subject property:

- Vice Collision Repair Inc.
- Verizon Wireless Old Auburn and Sylvan
- Sylvan Lumber Co.
- Capitol Mechanical Inc.
- Duncan Automotive Inc.

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- Aba Daba Rents Inc.
- Arco 5 Star
- Auburn Gas

Six of these eight sites are listed as either chemical storage facilities, hazardous waste generators, or having a permit for aboveground storage tanks. While violations exist for some of the sites, they appear to be administrative in nature (e.g., failure to submit proper paperwork, missing labels for waste/material containers), and do not necessarily indicate an existing or potential future unpermitted release of hazardous materials or petroleum products to the environment.

Two of the eight sites are listed as having leaking underground storage tanks. These sites are discussed in Section 5.3.9, State Water Resources Control Board.

5.3.2 Zoning and Land Use

Zoning and land use information for the subject property was obtained from City of Citrus Heights, Community and Development Department. Land use of the subject property is categorized as public, and surrounding parcels are listed as low-density residential and general commercial (City of Citrus Heights 2017). The subject property is zoned as RD2, which is categorized as “areas which are appropriate for large lots and detached single dwellings, together with hobby farming and keeping of animals, public and quasi-public uses, and similar and compatible uses.” The properties surrounding the subject property are zoned as “areas appropriate for detached single dwellings, duplexes in specified circumstances, and related compatible uses” (City of Citrus Heights 2017).

5.3.3 Sacramento County Department of Development and Code Services

Dudek contacted Sacramento County to obtain information regarding building permits, planning permits, and code violations or inspections reports. The county responded that they do not have any records pertaining to the subject property as it falls under the jurisdiction of City of Citrus Heights (Appendix D, Local Agency Records).

5.3.4 City of Citrus Heights

Dudek contacted City of Citrus Heights, City Clerk’s office for available records of building, planning, and demolition permits for the subject property. A representative of City of Citrus

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Heights, Alison Bermudez, provided drawings and plans for the Sylvan Middle School Demolition Project (Appendix D). Key points from these plans are summarized below:

- The demolition plans included demolition of school buildings, utilities and few trees/shrubs; grading plan; erosion control plan; and a tree preservation plan.
- The utility demolition plan indicated that three septic tanks and one grease trap were identified and removed following standard abandonment and demolition procedures. The three septic tanks were abandoned by removing the lid, crushing the bottom in place, and filling the tank with sand. The grease trap was removed and the excavation was backfilled with native sand. The locations of these former septic tanks and grease trap are shown in Figure 2.
- Transite pipes (which are known to contain asbestos) were also identified in the demolition plans and it was indicated that they were removed (Appendix D). Approximate locations where transite pipe were installed, as depicted in demo plan is shown in Figure 2.

Dudek requested additional information to determine if the transite pipes were removed and disposed of or left in place. As of the date of this report, Dudek has not received a response to this request.

Dudek contacted San Juan Unified School Districts on June 12, 2019, via phone call, for any records pertaining to the former Sylvan Middle School demolition. As of the date of this report, Dudek has not received a response.

5.3.5 Sacramento County Department of Agricultural Weights and Measures

Dudek contacted Sacramento County Department of Agricultural Weights and Measures to obtain information about pesticide, insecticide, and herbicide use on the subject property. The Department of Agricultural Weights and Measures responded on June 12, 2019, stating that there were no records of pesticide, herbicide, or chemical use for the subject property (Appendix D).

5.3.6 Sacramento County, Environmental Management Department

Dudek contacted Sacramento County Environmental Management Department (EMD), to obtain information about potential spills, tanks, or chemical use that may have impacted the environmental conditions on the subject property and adjacent school property. Dudek received the following information as summarized below and included in Appendix D:

1. Information regarding an incident dated August 24, 1993 regarding vandalism and fire in a science class due to spillage of various toxic chemicals. Fire and water damage was minimal and the fire was abated. The incident did not report any spillage to soil or any water sources and no casualties were reported.

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2. An incident report dated March 16, 2014 regarding release of an irritant chemical gas. The incident caused people in the room to have throat irritation, light headedness and nausea, and were treated for the symptoms. Sacramento metro fire hazardous material response truck conducted an investigation and did not detect any odor.
3. A letter from EMD to Sylvan School dated August 20, 1987 requesting an update to an existing permit to operate an underground storage tank.

Information found on the GeoTracker database, indicated that a UST was abandoned in 1973 (Appendix D). No further details about the size and content are reported. Further correspondence with EMD indicated that the school was rebuilt in 1930s, and was renovated multiple times. EMD stated that the underground storage tank (UST) referenced in the August 20, 1987 letter was likely used until 1973 and abandoned as per the handwritten note (“Tank Abandoned”) on the letter.

5.3.7 National Pipeline Mapping System

Dudek consulted the National Pipeline Mapping System online database. The National Pipeline Mapping System provides a public map viewer application that displays data related to gas transmission and hazardous liquid pipelines, liquefied natural gas plants, and breakout tanks under Department of Transportation Pipeline and Hazardous Material Safety Administration jurisdiction (NPMS 2019).

An active natural gas transmission pipeline, operated by Pacific Gas & Electric runs east/west approximately 0.76 miles north of the subject property (Appendix D). No accidents or incidents were identified on, or within 1 mile of, the subject property.

5.3.8 CalRecycle Solid Waste Information System

Dudek searched the CalRecycle Solid Waste Information System online database, which contains information on solid waste facilities, operations, and disposal sites throughout the State of California (CalRecycle 2019).

The subject property was not identified in the Solid Waste Information System database. No sites within one mile of the subject property were identified in the Solid Waste Information System database.

5.3.9 State Water Resources Control Board

Dudek searched GeoTracker, the SWRCB’s data management system, for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater. Records include sites that require cleanup, various unregulated projects, and permitted facilities (SWRCB 2019).

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The subject property was not identified on the GeoTracker database. The following sites were identified within 1 mile of the subject property, and have documented potential impacts on the environment:

- **Sylvan Lumber Co:** The site is located at 7200 Auburn Blvd, adjacent to the subject property on the east side of Auburn Blvd (Figure 2). A leaking gasoline UST was discovered in 1988 during tank removal. Analysis of contaminated soil in the excavation and stockpile reported “levels of contamination below action requirements.” The extent of contamination was not defined. The site received closure in July 1989.
- **Arco 5 Star:** The site is located at 7500 Auburn Blvd, approximately 0.3 miles north of the subject property. Reportedly petroleum hydrocarbon contamination in soil and groundwater contamination was found during removal of a leaking underground storage tank. The contaminated soil was excavated and disposed of offsite. Soil vapor extraction, air sparging and dual phase extraction was used to remediate the groundwater. Due to remedial activities the impacted groundwater plume has continued to reduce in extent and concentrations, and is limited to the site vicinity (Applied Engineering and Geology Inc. 2010). The site received regulatory closure in August 2011.
- **Roseville Telephone Company (also listed as Surewest Communications):** The site is located at 7656 Old Auburn Blvd, approximately 0.4 miles east of the subject property. The site investigation activities were conducted following dispenser upgrade activities at the site. The groundwater flow direction was determined to be southwestward. The groundwater monitoring results indicated low to non-detect concentrations of petroleum hydrocarbons and volatile organic compounds (VOCs). Approximately 2 pounds of TPH-diesel contaminated soil remained on site. Review of analytical tables and boring locations (APEX Envirotech Inc. 2007) indicate that the contamination is limited to the site. The site is currently open and under site assessment.
- **Placer Bank:** The site is located at 7632 Auburn Blvd, approximately 0.5 miles north of subject property. The soil at the site was contaminated by waste oils leaks and cleanup actions were completed in 1988. No additional records are available for review.
- **Chevron #9-2174:** The site is located at 7700 Auburn Blvd, approximately 0.7 miles north of the subject property. The site had multiple gasoline and used oil tanks which were removed in 1995. Soil and groundwater was reportedly contaminated by TPH, BTEX, and other VOCs. The contaminated soil was remediated using soil vapor extraction. The most recent groundwater monitoring report (2010) reported that the groundwater flow was southwestward, and the contamination plume was limited to the site and was stable and defined (CRA 2010). The site received regulatory closure in May 2010.

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- Mobil #10-Elo: The site is located at 7770 Auburn Blvd, approximately 0.7 miles north of the subject property. The site was a gasoline service station and reported a release of 2,500 gallons of gasoline from a UST in 1990. Groundwater gradient was determined to be north-northeast. TPH, BTEX, and methyl tert-butyl ether (MTBE) contaminated soil and groundwater were remediated using air and ozone sparging in 2005. Groundwater monitoring indicated decreasing concentrations of contaminants. The plume was determined to be well defined and contained within the vicinity of the site (GEOCON 2009). The site received regulatory closure in April 2010.
- Shell: The site is located at 7741 Auburn Blvd, approximately 0.7 miles north of the subject property. The most recent groundwater report (2015) indicated the groundwater flow was southwestward, and showed decreased concentrations of contaminants in groundwater (CRA 2015) over the years. The extent of contamination was determined to be limited to the site and reportedly met Low Threat Closure Policy criteria. The site received regulatory closure in January 2016.
- Rusch Park Corporation Yard: The site is located at 7401 Antelope Road, approximately 0.8 miles northwest of the subject property. The site is a park district corporate yard. The site contained three USTs (one 2,000-gallon and one 6,000-gallon gasoline tank, and one 2,000-gallon diesel tank). Groundwater depth was reportedly between 2-5 feet bgs. One of the tanks was overfilled and released gasoline into the tank cavity, impacting groundwater and soil. The site was remediated using vapor extraction, air sparging and recovery of spilled gasoline (Closure Summary 1996). The contamination was determined to be limited to the site. The site received regulatory closure in May 1997.
- Unocal: The site is located at 7911 Auburn Blvd, approximately 0.9 miles north of subject property. The site was a gasoline service station and had a leaking underground storage tank. The site had reported total petroleum hydrocarbon (TPH) and benzene, toluene, ethylene and xylene (BTEX) contamination in soil, which was limited to the vicinity of the UST location (Kleinfelder 1987). The case was closed by the regulatory agency in May 1996.

Based on the distance of these sites from the subject property, extent of contamination, and regulatory status, it is not likely that these sites have impacted the environmental conditions of the subject property.

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5.3.10 Department of Toxic Substances Control

Dudek reviewed EnviroStor, the DTSC data management system used for tracking cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination (DTSC 2019).

The subject property was not identified in the DTSC database. No sites were identified within one mile radius of the subject property.

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6 SITE RECONNAISSANCE

A site reconnaissance was conducted on June 10, 2019, by Jonathan Martin of Dudek. Allison Bermudez, Associate Planner of the City of Citrus Heights, was present during site visit.

The site reconnaissance consisted of walking the subject property, noting current conditions and taking photographs. Observations are provided below, and site photographs are presented in Appendix E.

The subject property consists of vacant land and the Sylvan Corner Public Plaza on the southeast corner of the subject property (Photographs 1 and 2). The vacant land was formerly Sylvan Middle School, which was demolished in 2016. Residual materials from the school were observed, as described in the sections below. The subject property is bound to the east by Auburn Blvd, to the south by Old Auburn Road, to the north by the Sylvan Cemetery and a single-family residential community, and to the west by irrigated athletic fields (primarily baseball and soccer) (Figure 2).

Wetlands and Natural Waterways

No wetlands or natural waterways were observed on the subject property.

Surface Water Discharge

Evidence of concentrated flow paths were not identified within the subject property. The majority of the northern and middle sections of the subject property gently slope to the west, while the southern section slopes to the south. Accumulated surface water (excess rainfall or irrigation) likely travels as sheet flow toward depressions along the perimeter of the subject property. Two storm drains were identified during the site reconnaissance: one in a depression at the west-northwest corner (Photograph 3), and one in the southern section (Photograph 4). It appears that surface flow generated from the southern portion of the Sylvan Cemetery discharges to the subject property at the northeast corner (Photograph 5), although there is no sign of an active drainage feature at this point. It appears that flow is captured in the vegetated strips along the fence and either infiltrates or moves gradually to the storm drain located at the west-northwest corner of the subject property.

Distressed Vegetation

Small patches of distressed vegetation and/or bare ground were observed on the subject property (Photographs 6 and 7). These patches appear related to the recent demolition activities on the subject property (former building pads, storage of equipment/material, compacted soils).

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Solid Debris Storage

Residual asphalt/concrete debris from the demolition was observed throughout the subject property, mixed in with the surface soil layer (Photographs 8 and 9). Other debris associated with the recent demolition, including wood, tile, and metal, was observed in small quantities partially buried in the surface soils (Photographs 10–13). Large sections of metal pipe (painted white) were observed at the southwest corner of the subject property (Photograph 14). Trash typically associated with large urban arterial roads and sidewalks was present along the eastern boundary of the subject property, adjacent to Auburn Blvd (Photograph 15).

Chemical Storage or Use

No chemical use or storage was observed on the subject property.

Unnaturally Discolored Ponds or Flowing Waters

No unnaturally discolored pools or flowing water were observed on the subject property.

Groundwater Wells, Cisterns, Cesspools, or Septic Tanks

No groundwater wells, septic tanks, cisterns, or cesspools were observed on the subject property during the site reconnaissance. A rusted pipe was observed near the location of former septic tank location (Photograph 11).

Sumps

No sumps were observed on the subject property.

Transformers

No transformers were observed on or adjacent to the subject property.

Abnormal Odor

No abnormal odors were observed on the subject property.

Soil Disturbances

Site topography appears to maintain the same grade as the former middle school, where previous foundations and open fields are easily discernable by shifts in substrate and vegetation composition (Photographs 1–16). The majority of the site was composed of compacted native soils (intermixed

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with asphalt/concrete debris; Photographs 8 and 9), although a small area of loose sand was observed (Photograph 16). The origin of the sand is unknown.

Storage Tanks

No storage tanks were observed on the subject property during the site reconnaissance.

Asbestos and Lead-Based Paint

No evidence of asbestos-containing materials was observed during the site reconnaissance. The metal pipes located at the southwest corner of the subject property (Photograph 14) had a white paint on the surface.

Mold

No evidence of mold was observed during the site visit.

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7 REVIEW OF HISTORICAL AERIAL PHOTOGRAPHS

Dudek reviewed historical aerial photographs obtained from EDR for 1937, 1947, 1952, 1957, 1964, 1966, 1972, 1984, 1993, 1998, 2005, 2009, 2012, and 2016 (Appendix F, Historical Aerial Photographs), and a Google Earth image dated October 2018. The aerial photographs are described in Table 1.

Table 1
Historical Aerial Photograph Review

Date	Subject Property	Surroundings
1937	A small building (Sylvan School) appears near the eastern edge of the subject property. Portion of land near eastern boundary and southeast corner is covered with trees. The western half of the subject property appears to be agricultural land. An improved road appears in the southeast corner of the subject property, and intersects Old Auburn Road in the south.	The surrounding area appears mostly agricultural. A few buildings are observed east of the subject property across the paved road (Auburn Blvd), and south of the subject property.
1947	Additional buildings are observed on the subject property. The remainder of the subject property appears unchanged.	A few small additional buildings appear in the surrounding areas, which appear residential or agricultural in nature.
1952	The western half of the subject property appears to be cleared and graded. Additional buildings are observed in the approximate center of the subject property.	A cleared ground in oval shape (probably a sport's field) appears on adjacent land in southeast. More buildings are observed to the northeast, east and southeast. Lands to the north appear to be used for agricultural purposes. Land to the south and west appear agricultural.
1957	Additional construction, including buildings and pavement, are observed on the subject property. The portion of land in southern corner appears to be covered with grass.	Residential and commercial development has increased to the east and southeast. New residential buildings are observed to the southwest.
1964, 1966, 1972	Additional buildings are observed on the subject property. The paved strip previously observed northwest of the buildings is no longer present. Land in northeast corner, appears to be used as a playground.	Increased residential development is observed to the west and north. Increased development, apparently residential, is observed to the east. Citrus Heights school is observed on adjacent land to the southeast. Auburn Blvd, Old Auburn Rd, and Sycuan Rd appear to be developed as two-lane roads. Adjacent land to the west of subject property appears disturbed and graded. The oval shape ground in adjacent southwest land is not observed in 1964 aerial and thereafter.
1984	No apparent changes are observed on the subject property as compared to the 1972 aerial photograph.	Increased residential development is observed to the south, across Old Auburn Blvd, and to the north of subject property.
1993	The northern portion appears to be paved and temporary structure is present.	Residential and commercial development has increased in surrounding area in south of Old Auburn Rd and northeast areas.

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Table 1
Historical Aerial Photograph Review

Date	Subject Property	Surroundings
1998	There are two additional small structures near the southeast corner.	No apparent changes in surrounding areas as compared to 1993 aerial photograph.
2005	The area south of school buildings appears as a paved and used as a parking lot. The road in southeast corner connecting Old Auburn Blvd. and two small structures previously observed in the southeast are no longer present. Sylvan Corner Public Plaza in the southeast appears to be developed.	No apparent changes in surrounding areas as compared to 1998 aerial photograph.
2009, 2012, 2016	No apparent changes are observed from the 2012 aerial photograph.	The adjacent properties appear the similar to the conditions observed in the 2005 aerial photograph, and are developed as residential and commercial area. Slight increases in development (paving, structures) are observed from 2009 through 2016.
October 2018- Google Earth Image	The subject property appears as a vacant land with few trees and patches of grass cover scattered across the subject property.	The surrounding properties appears developed as light commercial and residential area and developed two-way lanes.

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8 REVIEW OF HISTORICAL TOPOGRAPHIC MAPS

Dudek reviewed historical topographic maps from 1891, 1892, 1893, 1944, 1947, 1953, 1954, 1973, 1981, and 2012 (Appendix B). The topographic maps are a historical source that can be used to document the prior use of the subject property and surrounding area.

The topographic maps are described in Table 2.

**Table 2
Historical Topographic Maps Review**

Date	Subject Property	Surroundings
1891/1892/ 1893	The subject property is undeveloped vacant land.	Light duty roads borders the subject property to the south and east. Creeks are present approximately 0.5 miles north and 0.5 miles south of the subject property.
1902	At least one building is present in the southern portion of the subject property. A boundary monument (indicated by the "X" is located on the southern portion of the subject property.	Sparse buildings are observed in the surrounding areas connected to the arterial roads by unimproved roads.
1911	The subject property is labeled as the Sylvan School with one building. The boundary monument is depicted further to the southeast.	The unimproved roads connecting to nearby buildings are changed or no longer present.
1951, 1954	Additional buildings related to the school are observed on the subject property. The land appears to be graded and flatter compared to 1911 topography. A road depicted as primary highway appears in southeast corner and appears to intersect Old Auburn Road in south. .	Auburn Blvd to the south and Auburn Road/Sylvan Road to the east of the subject property are depicted as primary and secondary highways. The properties east of the Auburn Blvd and Sylvan Road (northeast, east, and southeast of the subject property) appear to be developed with road networks connecting to residential and commercial buildings. The downtown area of the City of Citrus Heights is depicted to the northeast. A cemetery appears on adjacent property to the north. Cripple Creek flows southwest-northeast to the north of the subject property, and Arcade Creek flows east-west to the south of the subject property. Interstate 80 (I-80) is observed 1.2 miles northwest of subject property.
1967	Additional buildings associated with Sylvan School appears on the subject property.	Citrus Heights School is observed on the southeast adjacent land. Development appears to be increased in northwest along Highway I 80, in northeast, southwest and surrounding properties in west.
1975*	School buildings are observed on the subject property. The formation of the buildings appears similar to the 1967 topographic map.	Surrounding areas appears to be more developed compared to 1967 topographic map.
1980	No apparent changes are observed on the subject property as compared to 1967/1975 historical topographic map.	I-80 appears to be developed as a two lane highway. Increased development and built-up is observed in surrounding areas

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**Table 2
Historical Topographic Maps Review**

Date	Subject Property	Surroundings
1992	Buildings are not depicted on the subject property.	Buildings are not depicted on the topographic map. Roads depicted appear to reflect current site conditions.
2012	Buildings are not depicted on the subject property. The road in southeast corner, is no longer observed.	Buildings are not depicted on the topographic map. Roads depicted appear to reflect current site conditions.

* Historical Topo Map 1975, appears as an aerial photograph.

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9 SITE HISTORY

Based on review of the historical aerial photographs and topographic maps, the subject property has been a school property since 1902 and labeled as Sylvan School starting in 1911. The school has been developed and renovated with addition of buildings and other facilities since its existence. The school buildings were demolished in 2016, and since then, the subject property has been vacant land. The Sylvan Corner Public Plaza in the southeast corner, northwest of the intersection of Auburn Boulevard and Old Auburn Road was developed around 2005.

The surrounding areas of the subject property are mostly low-density residential and light commercial buildings, with Sylvan Middle School located to the southeast, athletic fields to the west and Sylvan Cemetery District to the north.

9.1 Previous Environmental Site Assessments

The user of this report did not provide any previous environmental reports for the subject property.

9.2 Fire Insurance Maps

Historical Sanborn fire insurance maps were requested from EDR. Sanborn maps provide information regarding the historical uses of the subject property and surrounding properties. Sanborn maps typically exist for cities with populations of 2,000 or more; the coverage is dependent on the location of the subject site within the city limits. The Sanborn Map Report states that no fire insurance maps covering the subject property were found (Appendix G, Certified Sanborn Map Report).

9.3 City Directory

City directory listings were requested from EDR (Appendix H, City Directory Report). The city directory search identified listings for the years 1963, 1966, 1970, 1982, 1987, 1992, 1995, 2000, 2005, 2010, and 2014. The subject property is identified as Sylvan Elementary School (1963, 1966, and 1970), Sylvan Intermediate (1982, 1987), and San Juan Unified School District (1992, 1995, 2000, 2010, and 2014). Surrounding properties along the Auburn Blvd are listed as commercial businesses (restaurants, construction, mowers, shipping) and residential.

9.4 Review of Title Information and Environmental Liens

An environmental lien search is required to satisfy the requirements of the “All Appropriate Inquiries” rule for Comprehensive Environmental Response, Compensation, and Liability Act liability, per ASTM standards. A lien search was conducted by National Environmental Title Research LLC (NETR) (Appendix I, Environmental Lien Search Report). No environmental liens

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were identified for the subject property, (APN 211-0020-002-000). According to the NETR Report, the subject property is currently owned by San Juan School District. San Juan School District has owned the property since at least 1940; no conveyance of title for the subject property was found in the records.

9.5 Vapor Encroachment

Dudek evaluated vapor encroachment to determine whether there is a potential for vapors originating from contaminated soil and/or groundwater to occur in the subsurface below the existing and potential future on-site structures.

The EDR records search (Appendix J, Chain of Title and Tax Map Report) was used to evaluate listed contaminated sites as identified in federal, state, and local databases. Information obtained from other sources (historical reports, geologic and hydrogeological information, site reconnaissance, interviews, local regulatory agency responses), as discussed in this report, were also considered.

There are no reports of VOC contamination in soil or groundwater adjacent to, or on, the subject property that could impact the environmental condition of the subject property. As such, based on the available information, a vapor encroachment condition was not identified.

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10 REGULATORY AGENCY RECORDS SEARCH REVIEW

The regulatory database search gives a listing of sites within up to a one mile radius of the subject property (“target property” is the term used by EDR) that are known to be chemical handlers, hazardous waste generators, or have reported releases of hazardous substances or petroleum products. Information in these listings includes the location of the site relative to the subject property, type of potential environmental concern present, and the status of the site. The database search for this Phase I ESA was conducted by EDR in June 2019 (Appendix K, Regulatory Database Search Report). The findings of the EDR report are summarized in the following sections. The regulatory databases as listed in ASTM standard E1527-13 and shown in Table 3 were included in this search. Additional databases related to hazardous materials were also searched by EDR.

**Table 3
Regulatory Database Search Summary**

Acronym	Database	Search Distance	Subject Property Listed?	Number of Surrounding Sites Listed
NPL	National Priorities List (including proposed NPL sites and NPL Liens [target property only])	1 mile	No	0
Delisted NPL	National Priority List Deletions	1 mile	No	0
CERCLIS -SEMS	Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) – Superfund Enterprise Management System	0.5 miles	No	0
CORRACTS	Resource Conservation and Recovery Act (RCRA) Corrective Action	1 mile	No	0
CERCLIS NFRAP (SEMS ARCHIVE)	CERCLA Superfund Enterprise Management System Archive	0.5 miles	No	0
RCRA TSDF	RCRA - Transportation, Storage, and Disposal Facilities	0.5 miles	No	0
RCRA-LQG	RCRA Large Quantity Generators	0.25 miles	No	0
RCRA-SQG	RCRA Small Quantity Generators	0.25 miles	No	4
RCRA-CESQG	RCRA Conditionally Exempt Small Quantity Generators	0.25 miles	No	0
RCRA NonGen/NLR	RCRA Handlers, but not generators, of hazardous waste	0.25 miles	No	4
ERNS	Emergency Response Notification System	Target Property	No	0
US ENG CONTROLS	Sites with Engineering Controls	0.5 miles	No	0
US INST CONTROLS	Sites with Institutional Controls	0.5 miles	No	0
RESPONSE	State-and Tribal-Equivalent NPL	1 mile	No	0

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**Table 3
Regulatory Database Search Summary**

Acronym	Database	Search Distance	Subject Property Listed?	Number of Surrounding Sites Listed
ENVIROSTOR	State- and Tribal-Equivalent CERCLIS	1 mile	No	1
SWF/LF	State and Tribal Landfill and/or Solid Waste Disposal Site	0.5 miles	No	0
LUST	State Leaking Underground Storage Tank	0.5 miles	No	5
Indian LUST	Tribal Leaking Underground Storage Tank	0.5 miles	No	0
UST	State and Tribal Registered Underground Storage Tank	0.25 miles	No	0
CPS-SLIC	Cleanup Program Sites	0.5 mile	No	0
Indian UST	Registered Underground Storage Tank on Tribal Land	0.25 miles	No	0
FEMA UST	FEMA-owned Registered Storage Tank	0.25 miles	No	0
LUCIS	Institutional Control/Engineering Control	0.5 miles	No	0
Indian VCP	Voluntary Cleanup on Tribal Land	0.5 miles	No	0
VCP	State and Tribal Voluntary Cleanup	0.5 miles	No	0
US Brownfields	State and Tribal Brownfields	0.5 miles	No	1
<i>Additional environmental records, including local lists</i>		<i>Varies</i>	Yes	72

10.1 Subject Property

The subject property was identified in five different databases. These listings are related to the former Sylvan Middle School previously located on the subject property. Details are provided below:

- HAZNET: These listings are related to hazardous waste manifests submitted for off-site disposal, and do not indicate a release of hazardous materials to the environment. Reportedly, 65.74 tons of asbestos-containing waste was disposed of offsite at a landfill in 2004. Small quantities of laboratory chemical waste was stored and transferred offsite to a treatment/recovery facility in 1998, 2006, and 2008.
- Sacramento County Master List (Sacramento Co. ML) and: The subject property used to store hazardous waste/materials, but is currently listed as inactive. No violations were recorded.
- Historical underground storage tank (HIST UST): The size of UST is not reported; the UST reportedly stored waste (type not reported) (Appendix D).
- A construction stormwater discharge permit (under the National Pollutant Discharge Elimination System and California Integrated Water Quality System program) was activated in January 2017 and terminated in February 2018. No violations are noted.

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10.2 Nearby Properties

A total of 67 listings for nearby properties were identified in several databases searched by EDR. Most of the listings are in databases that track information on sites that handle hazardous materials or generate hazardous waste, but do not necessarily indicate an unpermitted release of hazardous substances to the environment. Four nearby sites have been identified as having confirmed or suspected contamination. These sites are Sylvan Lumber Company, ARCO 5 Star, Roseville Telephone Company and Surewest Communications, and Placer Bank. Details of the regulatory status of these sites were discussed in Section 5.3.9.

10.3 Unmapped Sites

Unmapped sites are flagged by EDR, but not mapped due to insufficient address information. They are usually included in the database search report because they are in the same zip code as the subject property. The EDR report did not identify any unmapped sites.

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11 POTENTIAL HAZARDS AND ENVIRONMENTAL CONCERNS

Information regarding the following potential sources of hazards and hazardous material releases from the interview, site reconnaissance, and review of regulatory agency records is described below.

Agricultural Use

Based on a review of aerial photographs, the western portion of the subject property appears to be used for agricultural purposes between approximately 1937 and 1952. As with any historically agricultural property, there is a potential for pesticide residues, including chlorinated compounds and metals, to remain in soil. However, it has been about 70 years since the subject property was used for agriculture and as pesticides break down over time, the residual pesticide levels would be likely low and below regulatory levels (Cal/EPA Human Health Screening Level for the residential or commercial scenario). Metals do not break down and may remain at elevated levels; however, as the subject property was developed, it is not expected that metals would be above regulatory screening levels.

Off-Site Sources

Based on the review of regulatory agency records, EDR reports and site reconnaissance, it is unlikely that off-site sources of contamination have impacted the environmental conditions of the subject property.

Hazardous Materials

Review of local agency records and site owner's interviews, suggests that hazardous chemicals and waste from science laboratories was stored on the subject property, however these wastes were reportedly disposed of offsite. No hazardous chemical or waste storage activities or containers were observed on the subject property during site reconnaissance.

Residential Use

The subject property has not been used for residential purposes.

Polychlorinated Biphenyl Items

No pole-mounted transformers was observed on or adjacent to the subject property.

Fill Material

An area of loose sand was observed in the southern section of the subject property; it appeared to be fill from a previous excavation during the demolition of former school buildings and septic tanks.

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Stained Soil

No stained soil was observed on the subject property.

Debris

Residual asphalt/concrete debris from the demolition was observed throughout the subject property, mixed in with the surface soil layer. Other debris associated with the recent demolition, including wood, tile, and metal, was encountered in small quantities in the surface soils. Large sections of metal pipe (painted white) were observed at the southwest corner of the subject property. Trash typically associated with large urban arterial roads and sidewalks was present along the eastern boundary of the subject property, adjacent to Auburn Blvd.

Tanks

No groundwater wells, septic tanks, cisterns or cesspools were observed on the subject property during the site reconnaissance. Three septic tanks and one grease trap were previously located on the subject property (Figure 2). These tanks have either been removed or abandoned (Section 5.3.4, City of Citrus Heights).

The three septic tanks were abandoned by reportedly removing the lid, crushing bottom in place, and filling the tank with sand.

Asbestos and Lead-Based Paint

Based on the site reconnaissance, interview, and review of historical sources, there were multiple buildings on the subject property until 2016. Since demolition, the subject property has primarily been a vacant, with exception of Sylvan Public Place Plaza in southeast corner. The site representative interviews indicates that an asbestos and lead-based paint survey was conducted before the demolition of the school in 2016. Based on EDR database (HAZNET), approximately 65 tons of asbestos containing wastes were removed and disposed of in an off-site landfill in year 2004, which may indicate that asbestos-containing materials were removed prior to demolition.

The demolition plans provided by City of Citrus Heights, indicated that transite pipes (which were known to contain asbestos) existed on the subject property and as per plan and site owners, these were removed during the demolition of school building and utilities. However no records or documents were obtained for confirmation during this assessment.

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Radon

The EDR well report presents radon test results for the vicinity of the subject property. Four sites within the subject property zip code 95621 were evaluated. The radon concentration at these sites averaged 0.025 pico curies per liter (pCi/L) in the first floor. The Federal EPA Radon Zone for Sacramento County is 3, which corresponds with indoor average expected indoor radon levels less than 2 pCi/L. The Federal Radon Action Level is 4 pCi/L.

Pipelines

Pieces and large sections of metal pipes were observed on the subject property. These appeared to be residual debris from demolition of the school. Dudek did not observe any indications of gas or petroleum transmission pipelines on the subject property.

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12 FINDINGS AND CONCLUSIONS

This assessment did not reveal evidence of RECs, HRECs, or controlled RECs in connection with the subject property. Dudek did identify concerns, which are associated with the demolition of the former Sylvan Middle School on the subject property. That and other pertinent information as described below was found for this Phase I ESA:

- Based on the review of aerial photographs, historical topographic maps, site representative interviews and local agency records, the subject property was used as Sylvan Middle School from at least 1902 until the school buildings and utilities were demolished in 2016.
- The subject property currently consists of primarily vacant land partly covered with trees; Sylvan Corners Public Plaza (plaza) occupies the southeast corner and is a part of Sylvan Corner Village Square (a commercial intersection consisting of lamp posts, bench, trash receptacle, trees and shrubs). During the preparation of this Phase I ESA the County corrected their GIS database to reflect that the plaza is part of the City's right-of-way. As this report was in progress when this correction was made, the plaza was retained as part of the subject property for the purposes of this report.
- Two storm drains, located in northwest and southeast corner of the subject property, were identified during the site reconnaissance. Small patches of distressed vegetation, debris including residual asphalt/concrete, wood, tile, pipes, and metal associated with recent demolition of the former school buildings and utilities, were encountered in small quantities mixed with the surface soils.
- According to the 2016 demolition plans provided to the City by the current owner, three septic tanks, transite pipe and one grease trap were located on the subject property. The grease trap was reportedly removed and excavation pit was backfilled with native soil. The septic tanks were reportedly abandoned in place. The transite pipe (asbestos-cement pipe) was reportedly removed and disposed of offsite; however, Dudek has not received confirmation of this information.
- The subject property is bound by Auburn Blvd and commercial properties to the east, single family residential units to the south and northwest, Citrus Heights Elementary School to the southwest, Sylvan Cemetery District to the north, and athletic fields (used for former Sylvan Middle School) to the west.
- The subject property was identified in the following regulatory databases: HAZNET, NPDES, CIWQS, HIST UST, SACRAMENTO CO. ML. The listings are associated with the former Sylvan Middle School. Based on the information for the HAZNET listing, approximately 65 tons of asbestos containing wastes were removed and disposed of in an

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off-site landfill in 2004. In addition, small quantities of laboratory chemical wastes were disposed of offsite. No violations or report of unauthorized releases were recorded.

Based on the records reviewed and visual observations during site reconnaissance, it is unlikely that adjacent or surrounding properties have impacted the environmental conditions at the subject property.

This assessment did not reveal evidence of RECs, HRECs, or CRECs. Thus, **no further investigation appears warranted at this time.**

Dudek identified the following items of concern:

- Dudek observed residual concrete/asphalt, pipeline sections, wood, tiles, and plastic debris throughout the subject property during site reconnaissance. This waste should be removed and disposed of in accordance with applicable laws and regulations.
- Dudek requested verification (e.g. demolition report) that the transite pipes (known to contain asbestos) indicated on the demolition plans were properly disposed of in accordance with applicable laws and regulations. This information has not been received as of the date of this report. If the pipes are still present, they would need to be removed and disposed of in accordance with applicable laws and regulations.
- Documents for an unknown and abandoned UST (size and content not reported) were identified during the review of local agency records and EDR databases. However, based on correspondence with Sacramento County EHD, the UST was abandoned in 1973 and no further data is available. Dudek assumes that this tank, if present, would be identified during a geophysical survey conducted prior to construction.

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13 LIMITATIONS

Dudek identified the following data gaps:

- Dudek requested the geotechnical report indicated in the site background questionnaire. Dudek has not yet receive a response regarding this request.
- Dudek requested information regarding the removal and offsite disposal of the transite pipe. A response has not yet been received.

These data gaps are less than significant as the information requested is beyond the scope of a Phase I ESA per the ASTM Standard E1527-13, and it is unlikely the information would change the findings of the report with regard to Recognized Environmental Conditions.

The findings and conclusions presented in this report are professional opinions based solely on the indicated data described in this report, visual observations of the subject property and vicinity, and our interpretation of the available historical information and documents reviewed. Dudek makes no warranty as to the accuracy of statements made by others or the accuracy of information included in documentation reviewed in connection with this study. This study was not intended to be a definitive investigation of potential contamination at the subject property and the recommendations do not necessarily include all conditions that may be present. It is possible that conditions or contamination exist at the subject property that have not been previously identified or that are not identified in this Phase I ESA.

No warranties or guarantees or representations, expressed or implied, are made by Dudek, except for the representation that this report has been prepared in accordance with current generally accepted practices and standards consistent with the level of care and skill exercised under similar circumstances by other professionals performing the same or similar services in the same or similar locality. The conclusions are intended exclusively for the purpose outlined herein, and may not be suitable for, or relied upon, by others and any use of this document is at the sole risk of said user.

In accordance with ASTM Standard E 1527-13, this Phase I ESA is valid for 180 days. After 180 days, this report, or the information presented in this report is no longer valid and must be updated or revised, as appropriate.

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14 REFERENCES

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