



Photograph 7 – View of metal storage drums located along the west side of the detached garage.



Photograph 8 – View of trash and debris located east of the detached garage.

**APPENDIX G
LIMITED AGRICULTURAL CHEMICAL SURVEY
LABORATORY REPORT AND CHAIN OF CUSTODY**



25712 Commercentre Drive
Lake Forest, California 92630
949.297.5020 Phone
949.297.5027 Fax

14 December 2011

Brian Brennan
EEI - Carlsbad
2195 Faraday Ave., Ste K
Carlsbad, CA 92008
RE: Sheffer Property

Enclosed are the results of analyses for samples received by the laboratory on 12/07/11 12:15. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Daniel Chavez
Project Manager

EEI - Carlsbad
2195 Faraday Ave., Ste K
Carlsbad CA, 92008

Project: Sheffer Property
Project Number: ACR-71400
Project Manager: Brian Brennan

Reported:
12/14/11 14:54

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
ACR-1	T111840-01	Soil	12/06/11 11:39	12/07/11 12:15
ACR-2	T111840-02	Soil	12/06/11 11:43	12/07/11 12:15
ACR-3	T111840-03	Soil	12/06/11 11:46	12/07/11 12:15
ACR-4	T111840-04	Soil	12/06/11 11:55	12/07/11 12:15

SunStar Laboratories, Inc.



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Daniel Chavez, Project Manager



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EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Sheffer Property Project Number: ACR-71400 Project Manager: Brian Brennan	Reported: 12/14/11 14:54
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ACR-1
T111840-01 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120808	12/08/11	12/09/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120806	12/08/11	12/10/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	

Surrogate: Tetrachloro-meta-xylene 100 % 35-140 " " " "

SunStar Laboratories, Inc.

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Daniel Chavez, Project Manager



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EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Sheffer Property Project Number: ACR-71400 Project Manager: Brian Brennan	Reported: 12/14/11 14:54
--	--	------------------------------------

ACR-2
T111840-02 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120808	12/08/11	12/09/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120806	12/08/11	12/10/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	
Surrogate: Tetrachloro-meta-xylene		78.0 %		35-140	"	"	"	"	

SunStar Laboratories, Inc.

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EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Sheffer Property Project Number: ACR-71400 Project Manager: Brian Brennan	Reported: 12/14/11 14:54
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ACR-3
T111840-03 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120808	12/08/11	12/09/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120806	12/08/11	12/10/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	
Surrogate: Tetrachloro-meta-xylene		100 %	35-140		"	"	"	"	

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EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Sheffer Property Project Number: ACR-71400 Project Manager: Brian Brennan	Reported: 12/14/11 14:54
--	--	------------------------------------

ACR-4
T111840-04 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120808	12/08/11	12/09/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120806	12/08/11	12/10/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	
Surrogate: Tetrachloro-meta-xylene		79.0 %		35-140	"	"	"	"	

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Daniel Chavez, Project Manager



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EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Sheffer Property Project Number: ACR-71400 Project Manager: Brian Brennan	Reported: 12/14/11 14:54
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Metals by EPA 6010B - Quality Control
SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1120808 - EPA 3051										
Blank (1120808-BLK1) Prepared: 12/08/11 Analyzed: 12/09/11										
Arsenic	ND	5.0	mg/kg							
Lead	ND	3.0	"							
LCS (1120808-BS1) Prepared: 12/08/11 Analyzed: 12/09/11										
Arsenic	114	5.0	mg/kg	100		114	75-125			
Lead	111	3.0	"	100		111	75-125			
Matrix Spike (1120808-MS1) Source: T111840-01 Prepared: 12/08/11 Analyzed: 12/09/11										
Arsenic	104	5.0	mg/kg	100	4.13	99.7	75-125			
Lead	97.9	3.0	"	100	1.49	96.4	75-125			
Matrix Spike Dup (1120808-MSD1) Source: T111840-01 Prepared: 12/08/11 Analyzed: 12/09/11										
Arsenic	102	5.0	mg/kg	100	4.13	98.0	75-125	1.60	20	
Lead	94.7	3.0	"	100	1.49	93.2	75-125	3.28	20	

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Daniel Chavez, Project Manager



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EEI - Carlsbad
 2195 Faraday Ave., Ste K
 Carlsbad CA, 92008

Project: Sheffer Property
 Project Number: ACR-71400
 Project Manager: Brian Brennan

Reported:
 12/14/11 14:54

Organochlorine Pesticides by EPA Method 8081A - Quality Control
SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1120806 - EPA 3550 ECD/GCMS

Blank (1120806-BLK1)

Prepared: 12/08/11 Analyzed: 12/10/11

alpha-BHC	ND	5.0	ug/kg							
gamma-BHC (Lindane)	ND	5.0	"							
beta-BHC	ND	5.0	"							
delta-BHC	ND	5.0	"							
Heptachlor	ND	5.0	"							
Aldrin	ND	5.0	"							
Heptachlor epoxide	ND	5.0	"							
gamma-Chlordane	ND	5.0	"							
alpha-Chlordane	ND	5.0	"							
Endosulfan I	ND	5.0	"							
4,4'-DDE	ND	5.0	"							
Dieldrin	ND	5.0	"							
Endrin	ND	5.0	"							
4,4'-DDD	ND	5.0	"							
Endosulfan II	ND	5.0	"							
4,4'-DDT	ND	5.0	"							
Endrin aldehyde	ND	5.0	"							
Endosulfan sulfate	ND	5.0	"							
Methoxychlor	ND	10	"							
Endrin ketone	ND	5.0	"							
Toxaphene	ND	200	"							
Chlordane (tech)	ND	50	"							

Surrogate: Tetrachloro-meta-xylene 70.5 " 100 70.5 35-140

LCS (1120806-BS1)

Prepared: 12/08/11 Analyzed: 12/10/11

gamma-BHC (Lindane)	158	5.0	ug/kg	200	78.9	40-120
Heptachlor	160	5.0	"	200	80.2	40-120
Aldrin	172	5.0	"	200	85.8	40-120
Dieldrin	200	5.0	"	200	100	40-120
Endrin	182	5.0	"	200	90.8	40-120
4,4'-DDT	163	5.0	"	200	81.3	33-147

Surrogate: Tetrachloro-meta-xylene 119 " 100 119 35-140

SunStar Laboratories, Inc.

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 949.297.5027 Fax

EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Sheffer Property Project Number: ACR-71400 Project Manager: Brian Brennan	Reported: 12/14/11 14:54
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Organochlorine Pesticides by EPA Method 8081A - Quality Control
SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1120806 - EPA 3550 ECD/GCMS

Matrix Spike (1120806-MS1)	Source: T111840-01			Prepared: 12/08/11	Analyzed: 12/10/11					
gamma-BHC (Lindane)	197	5.0	ug/kg	200	ND	98.6	30-120			
Heptachlor	202	5.0	"	200	ND	101	30-120			
Aldrin	219	5.0	"	200	ND	110	30-120			
Dieldrin	192	5.0	"	200	ND	96.0	30-120			
Endrin	191	5.0	"	200	ND	95.5	30-120			
4,4'-DDT	152	5.0	"	200	ND	76.1	30-120			
<i>Surrogate: Tetrachloro-meta-xylene</i>	<i>114</i>		<i>"</i>	<i>100</i>		<i>114</i>	<i>35-140</i>			

Matrix Spike Dup (1120806-MSD1)	Source: T111840-01			Prepared: 12/08/11	Analyzed: 12/10/11					
gamma-BHC (Lindane)	145	5.0	ug/kg	200	ND	72.6	30-120	30.4	30	QR-02
Heptachlor	150	5.0	"	200	ND	74.8	30-120	29.8	30	
Aldrin	159	5.0	"	200	ND	79.7	30-120	31.7	30	QR-02
Dieldrin	184	5.0	"	200	ND	92.0	30-120	4.18	30	
Endrin	177	5.0	"	200	ND	88.5	30-120	7.65	30	
4,4'-DDT	149	5.0	"	200	ND	74.7	30-120	1.84	30	
<i>Surrogate: Tetrachloro-meta-xylene</i>	<i>115</i>		<i>"</i>	<i>100</i>		<i>115</i>	<i>35-140</i>			

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Daniel Chavez, Project Manager

EEI - Carlsbad

2195 Faraday Ave., Ste K
Carlsbad CA, 92008

Project: Sheffer Property

Project Number: ACR-71400

Project Manager: Brian Brennan

Reported:

12/14/11 14:54

Notes and Definitions

QR-02 The RPD result exceeded the QC control limits; however, both percent recoveries were acceptable. Sample results for the QC batch were accepted based on percent recoveries and completeness of QC data.

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

RPD Relative Percent Difference

SunStar Laboratories, Inc.



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Daniel Chavez, Project Manager



CHAIN OF CUSTODY
 Environmental Equalizers, Inc. (dba "EEL")
 2195 Faraday Avenue, Suite K, Carlsbad, California 92008
 Phone: 760-431-3747 Fax: 760-431-3748 www.eelitiger.com

DATE: 12/6/2011 LABORATORY: SunStar Laboratories, Inc.

PROJECT NAME: Sheffer Property EEL PROJECT NUMBER: ACR-71400

PROJECT LOCATION: 9467 Lilaac Walk COLLECTOR: BRB

EEL PROJECT MANAGER: Brian R. Brennan TURN AROUND TIME: Normal

Electronic Data Format (EDF): Yes No

Global ID:

EMAIL RESULTS TO: brennan@eelitiger.com

SPECIAL INSTRUCTIONS/NOTES: T111840 Temp. 4.8

SAMPLE ID	DATE SAMPLED	TIME	SAMPLE TYPE	CONTAINER TYPE	EPA 8260B - VOCs	EPA 8260B - VOCs + TPH-g	EPA 8260B - TPH-g, BTEX, MTBE - ONLY	EPA 8015 M - TPH-g	EPA 8015 M - TPH-d	EPA 8015 M - TPH-ext (CCID)	EPA 6010B/7000 - Title 22 Metals	EPA 6010B - Arsenic - ONLY	EPA 6010B - Lead - ONLY	EPA 8081A - Organochlorine Pesticides	TO-15 - VOCs	TO-3 - TPH-g	NUMBER OF CONTAINERS
ACR-1	12/6/2011	1139	Soil	Glass Jar								X	X	X			1
ACR-2	12/6/2011	1143	Soil	Glass Jar								X	X	X			1
ACR-3	12/6/2011	1146	Soil	Glass Jar								X	X	X			1
ACR-4	12/6/2011	1155	Soil	Glass Jar								X	X	X			1

Relinquished By (signature): *[Signature]* Date/Time: 12/7/11

Received By (signature): *[Signature]* Date/Time: 11/27/11 1215

Relinquished By (signature): *[Signature]* Date/Time: 12/7/11

SAMPLE RECEIVING REVIEW SHEET

BATCH # T111840

Client Name: EEL - CARLSBAD

Project: SHEEPEN PROPERTY

Received by: DAN

Date/Time Received: 12-7-11 1215

Delivered by : Client SunStar Courier GSO FedEx Other _____

Total number of coolers received 0 Temp criteria = 6°C > 0°C (no frozen containers)

Temperature: cooler #1 5.0 °C +/- the CF (- 0.2°C) = 4.8 °C corrected temperature

cooler #2 _____ °C +/- the CF (- 0.2°C) = _____ °C corrected temperature

cooler #3 _____ °C +/- the CF (- 0.2°C) = _____ °C corrected temperature

Samples outside temp. but received on ice, w/in 6 hours of final sampling. Yes No* N/A

Custody Seals Intact on Cooler/Sample Yes No* N/A

Sample Containers Intact Yes No*

Sample labels match COC ID's Yes No*

Total number of containers received match COC Yes No*

Proper containers received for analyses requested on COC Yes No*

Proper preservative indicated on COC/containers for analyses requested Yes No* N/A

Complete shipment received in good condition with correct temperatures, containers, labels, volumes preservatives and within method specified holding times. Yes No*

* Complete Non-Conformance Receiving Sheet if checked Cooler/Sample Review - Initials and date RL 12-7-11

Comments:



EEI
Geotechnical & Environmental Solutions

**PHASE I ENVIRONMENTAL
SITE ASSESSMENT
And
LIMITED AGRICULTURAL
CHEMICAL SURVEY**

**Accretive Investments, Inc.
5.0-Acre “Carlson” Property
APN 128-440-06
9383 West Lilac Road
Escondido, California 92026**

**County Project Number: SP 3800 12-001; Lilac Hills Ranch
Environmental Log Number: 3910 12-02-003**

**December 13, 2011
(March 26, 2012 revisions)**

EEI Project Number ACR-71377

**PHASE I ENVIRONMENTAL SITE ASSESSMENT AND LIMITED AGRICULTURAL
CHEMICAL SURVEY**

Prepared for:

Mr. Jon Rilling
Vice President
Accretive Investments, Inc.
12275 El Camino Real, Suite 110
San Diego, California 92130

Subject property location:

5.0-Acre "Carlson" Property
APN 128-440-06
9383 West Lilac Road
Escondido, California 92026
EEI Project Number ACR-71377

Prepared and Edited by:



Brian R. Brennan, REA-II 07920
Senior Project Manager

Reviewed by:



Bernard A. Sentianin, PG 5530, REA I 3477
Principal Geologist

EEI
2195 Faraday Avenue, Suite K
Carlsbad, California 92008
(760) 431-3747

EEI Project No. ACR-71377

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GENERAL SUBJECT PROPERTY INFORMATION

Project Information: 5.0-Acre “Carlson” Property

EEl Project Number: ACR-71377

Subject Property Information:

5.0-Acre “Carlson” Property
APN 128-440-06
9383 West Lilac Road
Escondido, California 92026
EEI Project Number ACR-71377

Subject Property Access Contact: Mr. Jon Rilling, Accretive Investments, Inc. (858-345-3644) and Mrs. Linda Carlson, Property Owner

Consultant Information:

EEI
2195 Faraday Avenue, Suite K
Carlsbad, California 92008
Phone: (760) 431-3747
Fax: (760) 431-3748
E-mail Address of Environmental Professional: bbrennan@eeitiger.com

Inspection Date: December 1, 2011 / **Report Date:** December 13, 2011 (March 26, 2012 revisions)

Client Information:

Mr. Jon Rilling
Vice President
Accretive Investments, Inc.
12275 El Camino Real, Suite 110
San Diego, California 92130

Site Assessor:

Brian R. Brennan, REA-II 07920 – Senior Project Manager

EP Certification:

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR 312.10 (**Resume, Appendix A**).



Brian R. Brennan
Brian R. Brennan, REA-II 07920 – Senior Project Manager

AAI Certification:

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Brian R. Brennan
Brian R. Brennan, REA-II 07920 – Senior Project Manager

EXECUTIVE SUMMARY

At the request and authorization of the Client (Accretive Investments, Inc.), EEI conducted a Phase I Environmental Site Assessment (ESA) for the property located at 9383 West Lilac Road, Escondido, California. The purpose of this Phase I ESA was to assess the presence or likely presence of an existing, historical, or threatened release of any hazardous substances or petroleum products into structures, soil, and/or groundwater beneath the subject property, to the extent practical (i.e., *recognized environmental conditions* as delineated in ASTM E1527-05).

The rectangular-shaped subject property is located along a private drive, south of West Lilac Road, Escondido, California. The subject property encompasses a total of 5.0-acres on one contiguous parcel identified as Assessor’s Parcel Number (APN) 128-440-06. The subject property is identified by the address: 9383 West Lilac Road.

The subject property is bound by a citrus orchard and privately owned land to the north, and a combination of rural residences, agricultural and undeveloped land to the south, east, and west. The subject property contains four (4) residential structures that consist of two (2) manufactured homes and two (2) wood and stucco constructed detached garages, which are located along the east-central and north-central portions of the property, respectively. The balance of the subject property is undisturbed (southern portion) or cleared of native vegetation or contains ground cover, palms, and shrubs.

A review of the County of San Diego Land Use and Environmental Group (LUEG, 2011) website data indicated that the subject property is currently zoned as A70 – Limited Agriculture.

Based on historical records such as aerial photographs, topographic maps, and County records, the subject property was undeveloped land from approximately 1942 to 1991. In 2002, the northern portion of the subject property appeared to be developed with a residential structure, while the balance of the site remained undeveloped. From 2005 to 2007, additional structures were developed along the east-central portion of the site. No historical agricultural use was noted on the subject property.

EEI contacted the County of San Diego, California Department of Toxic Substances Control (DTSC), State Water Resources Control Board (SWRCB), and reviewed other State and Federal databases to determine if the subject property, or any adjacent properties, were listed as hazardous waste generators, underground storage tank releases (UST), or as having other environmental concerns (i.e., spill, leak, or aboveground tank). No releases/leaks or spills were documented at the subject property on any of the databases researched.

On December 1, 2011, EEI personnel conducted a reconnaissance of the subject property to physically observe the property and adjoining properties for conditions indicating a potential recognized environmental concern. Concerns would include any evidence of contamination, distressed vegetation, petroleum-hydrocarbon staining, waste drums, illegal dumping, or improper waste storage and/or handling. No evidence of *recognized environmental conditions* was noted on the subject property during our subject property reconnaissance efforts.

Based on the proposed future residential use of the subject property, EEI performed a limited agricultural chemical survey to evaluate soil beneath the site. Sampling activities were conducted on December 1, 2011. A total of six (6) discrete soil samples (ACR-1 through ACR-6), were collected at 6-inches below ground surface, and analyzed for Arsenic and Lead by EPA Test Method 6010B and Organochlorine Pesticides by EPA Method 8081A.

The results of our agricultural chemical survey revealed no concentrations of arsenic or organochlorine pesticides were detected above the laboratory reporting limit (i.e., “non-detect”) in the soil samples collected from the subject property. Lead was detected above the laboratory reporting limit in samples ACR-1, ACR-2 and ACR-3 at 4.2 milligrams per kilogram (mg/kg), 4.6 mg/kg and 4.7 mg/kg, respectively. No other samples analyzed detected lead above the laboratory reporting limit (i.e., “non-detect”).

The reported lead concentrations of 4.2 mg/kg, 4.6 mg/kg and 4.7 mg/kg in soil samples collected during this investigation are less than the residential California Human Health Screening Level (CHHSL) value of 150 mg/kg; therefore, further investigation does not appear to be warranted. Furthermore, the lead concentrations appear to represent background levels inherent to the site vicinity. Trace or background levels for soils within central and southwestern San Diego County range from 15.6 mg/kg to 57.1 mg/kg (Kearney Foundation Special Report, 1996).

We have performed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Designation E1527-05 for the subject property located at 9383 West Lilac Road, Escondido, California. Any exceptions to, or deletions from, this practice are described in Section 7.0 of this report. This Phase I ESA has revealed no evidence of *recognized environmental conditions* in connection with the property.

1.0 INTRODUCTION

1.1 Purpose

The purpose of this Phase I Environmental Site Assessment (ESA) was to assess the possible presence of *recognized environmental conditions* at the property located at 9383 West Lilac Road, Escondido, California (**Figure 1**). *Recognized environmental conditions* include those property uses that may indicate the presence or likely presence of an existing, historical, or threatened release of any hazardous substances or petroleum products into structures, soil, and/or groundwater beneath the property. The term *recognized environmental conditions* are not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that would not be subject to enforcement actions by a regulatory agency.

This ESA was performed in general conformance with the American Society for Testing and Materials (ASTM) *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, Designation E1527-05.

1.2 Scope of Services

The following scope of services was conducted by EEI:

- A review of readily available documents which included topographic, geologic, and hydrogeologic conditions associated with the subject property.
- A review of readily available maps, aerial photographs, and other documents relative to historical subject property usage and development.
- A review of previous environmental reports and regulatory file information pertaining to both existing and historic property conditions.
- A review of readily available federal, state, county, and city documents and database files concerning hazardous material storage, generation and disposal, active and inactive landfills, existing environmental concerns, and associated permits related to the subject property and/or immediately adjacent sites.
- A subject property reconnaissance to ascertain current conditions on the subject property.
- Interviews with person(s) knowledgeable of the subject property.
- A limited agricultural chemical survey, which consisted of collecting and analyzing soil samples from the subject property.
- March 26, 2012 revisions include: changes to aerial photography description and base aerial photograph for report figures.
- The preparation of this report which presents our findings, conclusions, and recommendations.

1.3 Reliance

This ESA has been prepared for the sole use of Accretive Investments, Inc. (Client). This assessment should not be relied upon by other parties without the express written consent of EEI and Client. Any use or reliance upon this assessment by a party other than the Client, therefore, shall be solely at the risk of such third party and without legal recourse against EEI, its employees, officers, or directors, regardless of whether the action in which recovery of damages is brought or based upon contract, tort, statute or otherwise.

This assessment should not be interpreted as a statistical evaluation of the subject property, but rather is intended to provide a preliminary indication of on-site impacts from previous property usage and/or the release of hazardous materials. If no significant indicators of the presence of hazardous materials and/or petroleum contamination are encountered during this search, this does not preclude their presence. The findings in this report are based upon published geologic and hydrogeologic information, information (both documentary and oral) provided by the County of San Diego, FirstSearch® (i.e., agency database search), various state and federal agencies, and EEI’s field observations. Some of these data are subject to change over time. Some of these data are based on information not currently observable or measurable, but recorded by documents or orally reported by individuals.

2.0 PHYSIOGRAPHIC SETTING

2.1 Subject Property Description

The rectangular-shaped subject property is located along private drive, south of West Lilac Road, Escondido, California (**Figure 2**). The subject property encompasses a total of 5.0-acres on one (1) contiguous parcel identified as Assessor’s Parcel Number (APN) 128-440-06 (**Appendix B**). The subject property is identified by the address: 9383 West Lilac Road.

The subject property is bound by a citrus orchard and privately owned land to the north, and a combination of rural residences, agricultural and undeveloped land to the south, east, and west. The subject property contains four (4) residential structures that consist of two (2) manufactured homes and two (2) wood and stucco constructed detached garages, which are located along the east-central and north-central portions of the property, respectively. The balance of the subject property is undisturbed (southern portion) or cleared of native vegetation or contains ground cover, palms, and shrubs.

A review of the County of San Diego Land Use and Environmental Group (LUEG, 2011) website data indicated that the subject property is currently zoned as A70 – Limited Agriculture.

Based on historical records such as aerial photographs, topographic maps, and County records, the subject property was undeveloped land from approximately 1942 to 1991. In 2002, the northern portion of the subject property appeared to be developed with a residential structure, while the balance of the site remained undeveloped. From 2005 to 2007, additional structures were developed along the east-central portion of the site. No historical agricultural use was noted on the subject property.

2.2 Topography

The subject property is located on the United States Geological Survey (USGS), Bonsall, 7.5-Minute Quadrangle (USGS, 1968, date revised 1975). Overall, the subject property is located on gently sloping terrain consisting of varying topographic relief from north to south. The subject property elevation ranges from approximately 850 feet above mean sea level (amsl) (southern portion) to approximately 900 feet amsl (northern portion). Based on topographic relief, surface water drainage appears to be predominately to the north.

2.3 Regional and Local Geology

The subject property and vicinity lies within the Peninsular Ranges Geomorphic Province of California (CGS, 2002). The Peninsular Ranges Geomorphic Province extends from the Transverse Ranges Geomorphic Province and the Los Angeles Basin, south to Baja California. This province varies in width from about 30- to 100-miles. It is bounded on the west by the Pacific Ocean, on the south by the Gulf of California and on the east by the Colorado Desert Province. The Peninsular Ranges are essentially a series of northwest-southeast oriented fault blocks. The Transverse Ranges Geomorphic Province bounds the Peninsular Ranges on the north.

Major fault zones and subordinate fault zones found in the Peninsular Ranges Province typically trend in a northwest-southeast direction. The closest major faults to the subject property are the Julian segment of the Elsinore Fault zone; the Rose Canyon Fault zone; and the Coronado Bank Fault zone (including the San Diego Trough Fault). Other major faults in the region include the San Jacinto Fault zone and the San Andreas Fault zone. The San Andreas Fault zone is considered the most active fault zone and borders the northeasterly margin of the province.

Geologic maps indicate the general vicinity of the subject property is underlain by Mesozoic aged (Cretaceous-age) granitic rocks (USGS, 2000). Specifically, the property is underlain by Tonalite of Couser Canyon, described as a Hornblende-biotite tonalite; coarse grained and massive. This Tonalite contain some granodiorite and is characterized by an abundance of pegmatite dikes.

Soils beneath the subject property and vicinity have been identified by the United States Department of Agriculture – Natural Resources Conservation Service, Web Soil Survey as the Cieneba Coarse Sandy Loam (CiE2), Fallbrook sandy loam series (FaE2), and Placentia sandy loam (PeC) (USDA, 2011). Soils in these series are reportedly deep, well drained soils that formed in material weathered from granitic rocks and are situated on slopes ranging from 2 to 30 percent.

2.4 Regional and Local Hydrogeology

According to the San Diego Regional Water Quality Control Board (SDRWQCB, 1994), the subject property is located within the groundwater designation of the Bonsall Subarea (HSA – 903.12), which is a part of the lower San Luis Hydrologic Area (HA – 903.10) and located within the San Luis Rey Hydrologic Unit (HU – 903.00). Groundwater beneath the San Luis HA has been identified as having existing beneficial uses for municipal, agricultural, and industrial supply processes.

EEI reviewed the California Department of Water Resources, Water Data Library website (WDL, 2011) for additional information pertaining to groundwater and water supply wells on or close to the subject property. No water wells are located on or in close proximity to the subject property.

2.5 Hydrologic Flood Plain Information

EEI reviewed the Federal Emergency Management Agency (FEMA, 2011) Flood Insurance Rate Map (FIRM) online database to determine if the subject property is located within a flood zone. According to FEMA, no FIRM coverage for the subject property was available. EEI reviewed the San Diego Geographic Information Source website (SanGIS, 2011) for flood plain information. According to the website, the subject property is located within flood Zone X. FEMA (and SanGIS) defines Zone X as an area of minimal flood hazard, usually depicted on FIRMs as above the 500-year flood level.

3.0 SUBJECT PROPERTY BACKGROUND

3.1 Subject Property Ownership

According to the County of San Diego Assessor the current owner of the subject property (APN 128-440-06) is identified as The Linda C. Carlson Trust with the following mailing addresses: 9383 West Lilac Road, Escondido, California 92026.

3.2 Subject Property History

EEI reviewed readily available information sources to evaluate historic land use in and around the subject property. These information sources include information from aerial photographs, USGS maps and the County of San Diego. The information sources reviewed is summarized in the following sections.

3.2.1 Aerial Photograph and Historical Map Review

Aerial photographs and historical topographical maps were reviewed to identify historical land development and any surface conditions which may have impacted the subject property. Photographs and historical topographic maps dating 1942, 1946, 1948, 1953, 1963, 1968, 1975, 1976, 1980, 1991, and 2002 were obtained and reviewed from Track Info Services/FirstSearch®, an environmental information/database retrieval service. A 2012 aerial photograph was provided by Accretive Investments, Inc. and reviewed, a copy of which is included herein (**Figure 2**).

Table 1 summarizes the results of the historical use review. Copies of the aerial photographs and historical topographic maps provided by Track Info Services/FirstSearch® are included in **Appendix C**. According to the information reviewed, the subject property was undeveloped land from approximately 1942 to 1991. In 2002, the northern portion of the subject property appeared to be developed with a residential structure, while the balance of the site remained undeveloped. From 2005 to 2007, additional structures were developed along the east-central portion of the site. No historical agricultural use was noted on the subject property.

TABLE 1 Summary of Historical Use Review		
Year	Source and Scale	Comments
1942	Topographic Map 1:62,500	No developed structures were noted on the subject property. West Lilac Road was present to the north. The surrounding area appeared to be undeveloped land.
1946	Aerial Photograph 1:375	Subject property appeared to be undeveloped and cleared of vegetation. No developed structures were noted. West Lilac Road, unimproved at the time, was visible to the north. The surrounding area appeared to be undeveloped and/or cleared for agricultural-related land use.
1948	Topographic Map 1:24,000	No apparent changes were noted to the subject property since the 1942 map.
1953	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1946 photograph.

TABLE 1 Summary of Historical Use Review		
Year	Source and Scale	Comments
1963	Aerial Photograph 1:375	The subject property remained undeveloped and appeared to be covered with native vegetation. A dirt road was present along the eastern property boundary. The subject property was surrounded by agricultural related land use and/or rural residences. Increased agricultural use and rural residences were noted in the surrounding area.
1968	Topographic Map 1: 24,000	No developed structures were noted on the subject property. The subject property and surrounding area were shaded green, which signified agricultural-related land use. An unimproved road delineated the eastern property boundary. West Lilac Road was visible to the north.
1975	Topographic Map 1:24,000	No apparent changes were noted to the subject property since the 1968 map.
1976	Aerial Photograph 1:750	No apparent changes were noted to the subject property since the 1963 photograph, except for a dirt road that bisected the property from the northeast corner to the west-central. Increased agricultural-related land use was noted in the surrounding area.
1980	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1976 aerial photograph.
1991	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1980 aerial photograph, except for a dirt clearing along the east-central portion of the property. The balance of the subject property appeared to be undeveloped. North and west of the subject property appeared to be cleared for agricultural use.
2002	Aerial Photograph 1:375	Subject property appeared to be developed with two (2) structures along the northern portion of the subject property. An unimproved dirt road bisected the central portion of the site from the northeast to the southwest. Increased residential and agricultural land use was visible in the surrounding area.
March 2012	Aerial Photograph <u>Accretive Investments, Inc.</u>	The subject property appeared as its current configuration, which consisted of one (1) residential structure along the northern portion of the property, along with a small trailer, metal storage container, utility shed, and vehicles. The east-central portion of the property was developed with a single story manufactured home and two (2) single story detached garages. The southern portion of the subject property remained undisturbed. West Lilac Road was visible to the north. The surrounding area appeared to be a mix of residential and agricultural-related land use.

3.2.2 City/County Directory

Directory listings associated with the subject property (9383 West Lilac Road) was obtained from Track Info Services/FirstSearch®, an environmental information/database retrieval service. The subject property address was only listed in 2011. A summary of the listings associated with the subject property address is summarized below in **Table 2**. Information for the target address (in bold) as well as the next lowest address on the same side of the street (left column) and next highest address on the same side of the street (right column). A copy of the City Directory Report is provided in **Appendix C**.

No addresses of potential concern, including gas stations, cleaners, automotive shops, and other address occupants of potential environmental concern were located on the subject street, or within the vicinity of the target address.

TABLE 2		
Summary of City/County Directory Search		
9383 West Lilac Road, Escondido, California 92026		
North Adjacent Addresses	Subject Property	South Adjacent Addresses
2011		
9381 West Lilac Rd Zosa Ranch & Gardens Bed and Breakfast	9383 West Lilac Road Carlson Linda	9417 West Lilac Road Murphy David
2007		
9381 West Lilac Road Zosa Ranch & Gardens Bead and Breakfast	9383 West Lilac Road Address not listed	9417 West Lilac Road Kelly David Murphy
2002		
9381 West Lilac Road Zosa Gardens & Ranch Bead and Breakfast	9383 West Lilac Road Address not listed	9417 West Lilac Road Murphy David
1997		
9381 West Lilac Road Zosa Ranch	9383 West Lilac Road Address not listed	9417 West Lilac Road Murphy David
1992		
9381 West Lilac Road Zosa Ranch	9383 West Lilac Road Address not listed	9417 West Lilac Road Murphy David
1986		
9381 West Lilac Road Martin Wm; Murphy Roger F	9383 West Lilac Road Address not listed	9407 West Lilac Road Wolk Chas J
1981		
9137 West Lilac Rd No Response	9383 West Lilac Road Address not listed	9407 West Lilac Rd Wolk Chas J
1974		
West Lilac Rd First listing this street 9867	9383 West Lilac Rd Address not listed	9867 West Lilac Rd Walker Noel
<i>End of search due to A) earlier directory or street listing not found; or B) listing out of range, listings re-numbered, or no numeric listings</i>		

3.2.3 Sanborn Fire Insurance Maps

Sanborn Fire Insurance maps were developed in the late 1800s and early 1900s for use as an assessment tool for fire insurance rates in urbanized areas. An on-line search was made at the Los Angeles County Public Library’s collection of Sanborn Fire Insurance maps (LAPL, 2011). Sanborn map coverage was not available for the subject property and/or surrounding area; therefore, indicating little or no development prior to the 1950s.

3.2.4 County of San Diego Land Use and Environmental Group

EEI researched the County of San Diego Land Use and Environmental Group (LUEG, 2011) website to review any available records related to development of the subject property. According to the online database KIVA maintained by the County (LUEG, 2011), various permits were on file for the subject property (APN 128-440-06). The permits included two septic systems, building and planning documents for an accessory building, and a grading permit. No other records were available for the subject property.

3.3 Regulatory Database Search

EEI reviewed known electronic database listings for possible hazardous waste generating establishments in the vicinity of the subject property, as well as adjacent sites with known environmental concerns. Facilities were identified by county, state, or federal agencies that generate, store, or dispose of hazardous materials. The majority of information in this section was obtained from FirstSearch®, an environmental information/database retrieval service. A copy of the FirstSearch® report is provided in **Appendix D**, along with a description of the individual databases. The subject property was not listed on any of the databases researched.

3.3.1 Federal Databases

National Priority List (NPL) – No listings were reported within one mile of the subject property.

NPL Delisted – No listings were reported within one-half mile of the subject property.

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) – No listings were reported within one-half mile of the subject property.

CERCLIS (NFRAP) Archive – No listings were reported within one-half mile of the subject property.

Resource Conservation and Recovery Information System (RCRA) Corrective Action Sites (COR) – No listings were reported within one mile of the subject property.

RCRA TSD Facility List (RCRA-D) – No listings were reported within one-half mile of the subject property.

RCRA Generators (RCRA-G) – No listings were reported within one-quarter mile of the subject property.

RCRA No Longer Regulated (NLR) – No listings were reported within one-eighth mile of the subject property.

Federal IC/EC – No listings were reported within one-quarter mile of the subject property.

Emergency Response Notification System (ERNS) – No listings were reported within one-eighth mile of the subject property.

The subject property was not identified on any of the above-referenced databases researched.

3.3.2 State and Regional Sources

Tribal Lands – One (1) listing was reported within one-mile of the subject property: **Bureau of Indian Affairs Contact I**. Tribal Lands listing are not generally considered rationale for environmental concern, unless the facility has a dual listing, such as a reported release. The listing does not have a dual listing or reported release; therefore, is not considered to be an environmental concern at this time.

State/Tribal Sites – No listings were reported within one mile of the subject property.

State Spills 90 – No listings were reported within one-eighth mile of the subject property.

State/Tribal Solid Waste Landfill (SWL) Sites – No listings were reported within one-half mile of the subject property.

State/Tribal California State Leaking Underground Storage Tanks (LUST) – No listings were reported within one-half mile of the subject property.

State/Tribal Permitted Underground Storage Tanks (UST)/Aboveground Storage Tanks (AST) – No listings were reported within a one-quarter mile radius of the subject property.

State/Tribal IC/EC – No listings were reported within one-quarter mile of the subject property.

State/Tribal Voluntary Cleanup Program Properties (VCP) – No listings were reported within one-half mile of the subject property.

State/Tribal Brownfields – No listings were reported within one-half mile of the subject property.

State Permits – No listings were reported within a one-eighth mile radius of the subject property.

State Other – No listings were reported within one-quarter mile of the subject property.

Hazardous Waste (HW) Manifest – No listings were reported within a one-eighth mile radius of the subject property.

The subject property was not identified on any of the above-referenced databases researched.

3.4 Regulatory Agency Review

3.4.1 Deer Springs Fire Protection District

EEI contact the Deer Springs Fire Protection District (DSFPD) for information pertaining to hazardous waste releases, spills, incident reports, and/or inspection reports for the subject property. According to staff, the DSFPD does not hold records related to hazardous releases, spills, or UST permits and referred EEI to the County of San Diego Department of Environmental Health (see below).

3.4.2 County of San Diego Department of Environmental Health

EEI submitted a request to review public records to the County of San Diego Department of Environmental Health (DEH) for the subject property: APN 128-440-06 (9383 West Lilac Road). According to Ms. Joyce Ellman, Office Support Specialist, no permits were on file.

EEI also submitted a request to review public records to the County of San Diego DEH, Land and Water Quality Division for the subject property: APN 128-440-06 (9383 West Lilac Road). According to Ms. Sandy Johnson, Senior Office Assistant, two (2) files were on record for the subject property. The records were for a 1,000-gallon and 1,500-gallon septic tank system associated with the on-site structures. No other records were on file.

3.4.3 State Water Quality Control Board

EEI reviewed the online database GeoTracker (2011), which provides records on LUSTs and Spills, Leaks, Investigation and Cleanup (SLIC) sites, which is maintained by the State Water Quality Control Board. Neither the subject property nor any adjacent or nearby properties were listed on any of the databases researched.

3.4.4 Department of Toxic Substances Control

EEI reviewed the online database EnviroStor (2011), which provides records on LUSTs, SLICs, Priority cleanup sites and states sites, which is maintained by the Department of Toxic Substances Control (DTSC). Neither the subject property nor any adjacent or nearby properties were listed on any of the databases researched.

3.4.5 Review of Division of Oil, Gas and Geothermal Resources Files

Oil and gas wells were not observed on the subject property during our subject property reconnaissance. A review of the California Division of Oil, Gas, and Geothermal Resources Website for oil and gas fields in California and Alaska (CDOGGR, 2011) indicated no petroleum exploration or production has occurred on or immediately adjacent to the subject property (identified as within Township 10S, Range 02W, Section 19).

3.4.6 National Pipeline Mapping System

EEI reviewed the National Pipeline Mapping System (NPMS, 2011) public viewer website for gas transmission pipelines and hazardous liquid trunklines on or close to the subject property. According to the information reviewed, no pipelines are located on or in close proximity to the subject property.

3.5 Interview with Current Property Owner

EEI provided an owner questionnaire to Mrs. Laurel Carlson (subject property owner) regarding the past and present use of the subject property. According to the questionnaire, Mrs. Carlson and her husband have owned the subject property since 1986 (approximately 25 years). Mrs. Carlson noted that the subject property has been utilized to grow a few palms and other plants, and for residency. Information provided by Mrs. Carlson is summarized below. A copy of the owner questionnaire Mrs. Carlson’s associated responses is included in **Appendix E**.

3.5.1 Past or Present Uses Indicating Environmental Concern

Mrs. Carlson was not aware of any past or present uses of the subject property indicating environmental concern.

3.5.2 Environmental Liens or Governmental Notification

Mrs. Carlson was not aware of any deed restrictions, environmental liens or governmental notification relating to past or recurrent violations of environmental laws with respect to the property or any facility located on the property.

3.5.3 Presence of Hazardous Substances or Environmental Violations

Mrs. Carlson was not aware of any past or present environmental violations with respect to the property or any facility located on the property.

3.5.4 Previous Assessments

Mrs. Carlson was not aware of any previous assessments conducted at the subject property.

3.5.5 Legal Proceedings

Mrs. Carlson was not aware of any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of any hazardous substance or petroleum products involving the property by any owner or occupant of the property.

3.6 User Provided Information

Pursuant to ASTM E1527-05, EEI provided a Phase I ESA User Specific Questionnaire to the “user” (the person on whose behalf the Phase I ESA is being conducted), in this case, Mr. Jon Rilling, with Accretive Investments, Inc. completed the questionnaire. The User Specific Information provided by Mr. Rilling is documented below. A copy of the user specific questions (per ASTM E1527-05) with Mr. Rilling’s associated responses is included in **Appendix E**.

3.6.1 Environmental Liens or Activity and Use Limitations

Mr. Rilling stated that he is not aware of any environmental liens, land use limitations, deed restrictions or governmental notifications relating to past or recurrent violations of environmental laws with respect to the property or any facility located on the property.

3.6.2 Specialized Knowledge

Mr. Rilling stated that he has no specialized knowledge related to the subject property.

3.6.3 Valuation Reduction for Environmental Issues

Mr. Rilling stated that the purchase price for this property reasonably reflects the fair market value of the property.

3.6.4 Presence or Likely Presence of Contamination

Mr. Rilling indicated that he does not know of any specific issues related to past uses, specific chemicals, spills, releases, or cleanups which may have occurred on the property.

3.6.5 Other

Mr. Rilling noted that the Phase I ESA is required due to underwriting and county requirements related to the sale of the property.

3.7 Previous Assessments

Based on the information provided by the property owner, Mrs. Linda Carlson, no previous assessments (i.e., Phase I ESA) have been conducted on the subject property.

3.8 Other Environmental Issues

3.8.1 Asbestos-Containing Materials

Asbestos, a natural fiber used in the manufacturing of a number of different building materials, has been identified as a human carcinogen. Most friable (i.e., easily broken or crushed) asbestos-containing material (ACM) was banned in building materials by 1978. By 1989, most major manufacturers had voluntarily removed non-friable ACM (i.e., flooring, roofing, and mastics/sealants) from the market. These materials, however, were not banned completely.

In October 1995, the Federal Occupational Safety and Health Administration (OSHA) redefined the manner by which building materials are classified in regards to asbestos and the also the way these materials are to be handled. Under this ruling, “thermal system insulation and sprayed-on or troweled on or otherwise applied surfacing materials” applied before 1980 are considered presumed asbestos containing materials (PACM). Other building materials such as “floor or ceiling tiles, siding, roofing, transite panels” (i.e., non-friable) are also considered PACM unless tested.

An ACM survey was not conducted at the subject property as part of this Phase I ESA. Based on aerial photograph data, the structures located on the subject property appeared to have been constructed between 1991 and 2007. It is unlikely that ACM is present within building materials; therefore, further investigation does not appear to be warranted.

3.8.2 Lead-Based Paint

Lead-based paint (LBP) is identified by OSHA, the Environmental Protection Agency (EPA) and the Department Housing and Urban Development Department (HUD) as being a potential health risk to humans, particularly children, based upon its effects to the central nervous system, kidneys, and bloodstream. The risk of lead-based paint has been classified by HUD based upon the age and condition of the painted surface. This classification includes the following:

- maximum risk is from paint applied before 1950;
- a severe risk is present from paint applied before 1960;
- a moderate risk is present from paint applied before 1970;
- a slight risk is present from paint applied before 1977; and
- paint applied after 1977 is not expected to contain lead.

A LBP survey was not conducted at the subject property as part of this Phase I ESA. Based on aerial photograph data, the structures located on the subject property appeared to have been constructed between 1991 and 2007. It is unlikely that LBP is present within building materials; therefore, further investigation does not appear to be warranted.

3.8.3 Radon

Radon is a radioactive gas which has been identified as a human carcinogen. Radon gas is typically associated with fine-grained rock and soil, and results from the radioactive decay of radium. The U.S. EPA recommends that homeowners in areas with radon screening levels greater than 4 Picocuries per liter (pCi/L) conduct mitigation of radon gas to reduce exposure.

Sections 307 and 309 of the Indoor Radon Abatement Act of 1988 (IRAA) directed the U.S. EPA to list and identify areas of the U.S. with the potential for elevated indoor radon levels. U.S. EPA's Map of Radon Zones (EPA-402-R-93-071) assigns each of the 3,141 counties in the US to one of three zones based on radon potential:

- Zone 1 counties have a predicted average indoor radon screening level greater than 4 pCi/L.
- Zone 2 counties have a predicted average indoor radon screening level between 2 and 4 pCi/L.
- Zone 3 counties have a predicted average indoor radon screening level less than 2 pCi/L.

Based on such factors as indoor radon measurements; geology; aerial radioactivity; and soil permeability, the U.S. EPA has identified the County of San Diego as Zone 3 (i.e., a predicted average indoor radon screening level less than 2 pCi/L). EEI does not consider radon as a significant environmental concern at this time.

3.8.4 Polychlorinated Biphenyls

Polychlorinated biphenyls (PCB's) are used in electrical equipment, particularly in capacitors and transformers, because they are electrically nonconductive and stable at high temperatures. PCB's persist in the environment, accumulate in organisms, and concentrate in the food chain.

The disposal of these compounds is regulated under the Toxic Substances Control Act, which banned the manufacture and distribution of PCB's. By Federal definition, PCB equipment contains 500 parts per million (ppm) or more of PCB's, where PCB-contaminated equipment contains PCB concentrations greater than 50 ppm but less than 500 ppm. The US Environmental Protection Agency (EPA), under TSCA guidance, regulates the removal and disposal of all sources of PCB's containing 50 ppm or more.

Any electrical equipment containing dielectric insulating fluids or coolants, manufactured prior to 1976, should be considered as potentially PCB-containing. This includes transformers, capacitors, and fluorescent light fittings. In addition, PCB's may also be found as a stabilizer in older lubricating oils, pesticide extenders, cutting oils, hydraulic fluids, paints, sealants, and flame retardants (UNEP, 1999).

One (1) pad-mounted transformer was observed along the east-central portion of the subject property. The transformer appeared to be in good operating condition and no signs of leaking were noted. Based on our experience with similar sites surrounding the subject property and San Diego County, the presence of PCB-containing transformers is unlikely; and is therefore not considered an environmental concern at this time.

4.0 SUBJECT PROPERTY RECONNAISSANCE

4.1 Purpose

The purpose of our subject property reconnaissance was to visually and physically observe the subject property, structures, and adjoining properties for conditions indicating an existing release, past release, or threatened release of any hazardous materials/substances or petroleum products into structures on the subject property, or into soil and/or groundwater beneath the subject property. This would include any evidence of contamination, distressed vegetation, petroleum-hydrocarbon surface staining, waste drums, ASTs/USTs, illegal dumping, or improper waste storage/handling. Detailed information is provided in the text below.

4.2 Subject Property

On December 1, 2011, EEI personnel mobilized to the subject property and conducted a walking reconnaissance. Access to the subject property was provided by Mrs. Linda Carlson, the current property owner. Visual conditions observed during our reconnaissance of the subject property are documented in a Photographic Log (**Appendix F**), and summarized in **Table 3**.

The subject property is located along a private drive, south of West Lilac Road, Escondido, California (**Figure 2**). The subject property encompasses a total of 5.0-acres on one contiguous parcel identified as Assessor’s Parcel Number (APN) 128-440-06 (**Appendix B**). The subject property is identified by the address: 9383 West Lilac Road.

The subject property is bound by a citrus orchard and privately owned land to the north, and a combination of rural residences, agricultural and undeveloped land to the south, east, and west. The subject property contains four (4) residential structures that consist of two (2) manufactured homes and two (2) wood and stucco constructed detached garages, which are located along the east-central and north-central portions of the property, respectively. The balance of the subject property is undisturbed (southern portion) or cleared of native vegetation or contains ground cover, palms, and shrubs.

A small wooden storage shed and metal storage container were observed along the northern portion of the property. The shed and container contained various household items, gardening tools, small quantities of fuel and household cleaning products, and landscape materials. EEI observed below ground irrigation piping throughout the property and a pad-mounted transformer along the east-central portion of the property. The transformer appeared to be in good working condition and no signs of leakage or staining were observed. A above ground propane tank was observed along the southeast portion of the site. The tank appeared to be in good operating condition. The southern half of the subject property appeared to be undisturbed and covered with native vegetation.

EEI personnel conducted a reconnaissance of the property by traversing the property from north to south then east to west to physically observe the property and adjoining properties for conditions indicating a potential environmental concern. Concerns would include any evidence of contamination, distressed vegetation, petroleum-hydrocarbon staining, waste drums, illegal dumping, or improper waste storage and/or handling. No evidence of *environmental concerns* was noted on the subject property during our site reconnaissance.

TABLE 3 Summary of Subject Property Reconnaissance		
Item	Concerns	Comments
General Housekeeping	No	Good
Surface Spills	No	None observed.
Stained Surfaces	No	None observed.
Fill Materials	No	None observed.
Pits/Ponds/Lagoons	No	None observed.
Surface Impoundments	No	None observed.
ASTs/USTs	No	None observed.
Distressed Vegetation	No	None observed.
Wetlands	No	None observed.
Electrical Substations	No	None observed.
Areas of Dumping	No	None observed.
Transformers	No	One pad-mounted transformer was observed along the east-central portion.
Waste/Scrap Storage	No	None observed.
Chemical Use/Storage	No	Small quantities of fuel and household cleaning items were observed.

4.3 Adjacent Properties

EEI conducted a visual and auto reconnaissance of the adjoining neighborhoods (to the extent practical) to evaluate the potential for offsite impacts that may affect the subject property. These would include evidence of chemical storage or usage, surface staining or leakage, distressed vegetation, or evidence of illegal dumping.

In general, the subject property is surrounded by rural residences, undeveloped land or agricultural properties. Access was limited; however, immediately adjacent properties were not identified as having environmental related issues on any of the databases researched, and are not considered as an environmental concern. No service stations, dry cleaners, or industrial properties were located in the immediate vicinity.

5.0 LIMITED AGRICULTURAL CHEMICAL SURVEY

The subject property has been utilized for agricultural purposes (i.e., orchards) in the past. It is likely that restricted agricultural chemicals were applied to subject property soils, which is a potential REC. Based on the future planned property use (residential), additional investigation efforts (i.e., soil sampling and analysis) were performed by EEI to further evaluate subject property soils for agricultural chemicals.

There is no specific guidance regarding the testing and analysis of heavy metals and/or pesticides on soils at residential building sites in San Diego County. Therefore, EEI relied principally on the Department of Toxic Substance Control's (DTSC) August 2008 *“Interim Guidance For Sampling Agricultural Properties”*, combined with our experience gathered over the last two decades. The DTSC document provides guidance for sampling of former agricultural properties (undisturbed) where pesticides and/or fertilizers were presumably applied uniformly, for agricultural purposes, consistent with normal application practices. The DTSC document was initially prepared for use in evaluating soil at proposed new school sites and existing schools undergoing expansion projects where the property was currently or previously used for agricultural activities, but has been expanded to provide a uniform and streamlined approach for evaluating agricultural properties.

Based on the size of the property (5.0-acres), and EEI’s experience at similar sites, a total of six (6) discrete soil samples, were collected at near-surface (6-inches below grade) locations on the subject property. The following sections discuss our investigation activities.

5.1 Field Investigation

On December 1, 2011, EEI personnel mobilized to the subject property to conduct soil sampling activities with a shovel. Soil sampling locations were selected with the goal of collecting representative soil samples from the subject property. A total of six (6) discrete locations (identified as ACR-1 through ACR-6, **Figure 3**) were chosen to provide representative coverage.

Samples were collected approximately six-inches below ground surface (bgs), using a shovel. Sample material was extracted from the ground and placed in laboratory-supplied, 4-ounce glass jars. The jar was sealed with a Teflon-lined cap, and labeled with a number unique to the sample. The samples were placed in a chilled cooler and subsequently picked up by SunStar Labs, a California State-certified laboratory, under proper Chain-of-Custody (COC) documentation.

5.2 Laboratory Analytical Testing

All six (6) discrete soil samples (ACR-1 through ACR-6) collected during this investigation were analyzed for Arsenic and Lead by United States Environmental Protection Agency (U.S. EPA) Test Method 6010B and Organochlorine Pesticides by U.S. EPA Test Method 8081A. The following bulleted items summarize the results of laboratory analytical testing:

- No concentrations of arsenic or organochlorine pesticides were detected above the laboratory reporting limit (i.e., “non-detect) in any of the samples analyzed.
- Lead was reported above the laboratory detection limit in sample ACR-1 at 4.2 milligrams per kilogram (mg/kg), ACR-2 at 4.6 mg/kg, and ACR-3 at 4.7 mg/kg. Lead was not reported in any of the other samples analyzed.

The attached **Table 4** summarizes laboratory analytical results. Complete laboratory reports and COC documentation are provided in **Appendix G**.

TABLE 4 Soil Sample Results									
Sample ID	Depth (inches bgs)	Date Sampled	EPA 6010B		EPA 8081A				
			Arsenic	Lead	Dieldrin	DDE	DDD	DDT	All Other Constituents
			Reported in mg/kg		Reported in µg/kg				
ACR-1	6	12/1/2011	<5	4.2	<5	<5	<5	<5	<5-200
ACR-2	6	12/1/2011	<5	4.6	<5	<5	<5	<5	<5-200
ACR-3	6	12/1/2011	<5	4.7	<5	<5	<5	<5	<5-200
ACR-4	6	12/1/2011	<5	<3	<5	<5	<5	<5	<5-200
ACR-5	6	12/1/2011	<5	<3	<5	<5	<5	<5	<5-200
ACR-6	6	12/1/2011	<5	<3	<5	<5	<5	<5	<5-200
Laboratory Reporting Limit			5	3	5	5	5	5	5-200
Residential CHHSLs			0.07	150	35	1,600	2,300	1,600	NA
bgs = below ground surface; CHHSL = California Human Health Screening Levels; EPA = Environmental Protection Agency; mg/kg = milligrams per kilogram; NA = Not Applicable/Analyzed; µg/kg = micrograms per kilogram.									

5.3 Discussion of Testing Results

The results of our agricultural chemical survey revealed no concentrations of arsenic or organochlorine pesticides were detected above the laboratory reporting limit (i.e., “non-detect”) in the soil samples collected from the subject property. Lead was detected above the laboratory reporting limit in samples ACR-1, ACR-2 and ACR-3 at 4.2 mg/kg, 4.6 mg/kg and 4.7 mg/kg, respectively. No other samples analyzed detected lead above the laboratory reporting limit (i.e., “non-detect”).

EEI compared the reported lead concentrations to the California Human Health Screening Levels (CHHSL) for a residential land use scenario. The CHHSLs are concentrations of select hazardous chemicals that are used to estimate and compare reported values in soil to risk to human health. The following bulleted items summarize the reported values:

- The reported lead concentrations of 4.2 mg/kg, 4.6 mg/kg and 4.7 mg/kg in soil samples collected during this investigation are less than the CHHSL residential screening level of 150 mg/kg. Furthermore, the lead concentrations appear to represent background levels inherent to the site vicinity. Trace or background levels for soils within central and southwestern San Diego County range from 15.6 mg/kg to 57.1 mg/kg (Kearney Foundation Special Report, 1996).

6.0 FINDINGS AND OPINIONS

Based on the information obtained in this ESA, EEI has the following findings and opinions:

- Known or suspected RECs – The following known or suspected RECs have been identified during the preparation of this ESA:

- Based on the future planned property use (residential), additional investigation efforts (i.e., soil sampling and analysis) were performed by EEI to further evaluate subject property soils for agricultural chemicals.

The results of our agricultural chemical survey (see Section 5.0 –Limited Agricultural Chemical Survey) revealed no concentrations of arsenic or organochlorine pesticides in the soil samples collected from the subject property above the laboratory reporting limit (i.e., non-detect). Concentrations of lead were detected in three of the six soil samples collected during this investigation; however, the levels were less than applicable residential screening values. Therefore, further investigation does not appear to be warranted at this time.

- Historical REC’s – No historical REC’s have been revealed during the preparation of this ESA.
- *De Minimis* Conditions – No de minimis conditions have been revealed during the preparation of this ESA.

7.0 DATA GAPS AND DEVIATIONS FROM ASTM PRACTICES

Section 3.2.20 (ASTM 1527-05) defines a data gap as “a lack or inability to obtain information required by the practice despite good faith efforts of the environmental professional to gather such information.”

7.1 Historical Data Gaps

No historical data gaps were identified during our research efforts.

7.2 Regulatory Data Gaps

No regulatory data gaps were identified during our research efforts.

7.3 On-site Data Gaps

No on-site data gaps were identified during our research efforts.

7.4 Deviations from ASTM Practices

Section 12.10 (ASTM 1527-05), states that all deletions and deviations from this practice shall be listed individually and in detail, including client imposed constraints, and all additions should be listed.

EEI believes that there are no exceptions to, or deletions from, the ASTM Designation E1527-05 Guidelines.

8.0 CONCLUSIONS

We have performed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Designation E1527-05 for the subject property located at 9007 West Lilac Road, Escondido, California. Any exceptions to, or deletions from, this practice are described in Section 7.0 of this report. Phase I ESA has revealed no evidence of *recognized environmental conditions* in connection with the property.

9.0 REFERENCES

California Department of Water Resources, Water Data Library (WDL), Website (<http://www.water.ca.gov/waterdatalibrary>), accessed December 2011.

California Division of Oil, Gas, and Geothermal Resources (CDOGGR) Website (<http://maps.conservation.ca.gov/doms/index.html>), accessed December 2011.

California Environmental Protection Agency (CalEPA), 2005, “Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties.”

California Geological Survey (CGS), 2002, “California Geomorphic Provinces, Note 36.”

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Department of Toxic Substances (DTSC), Website (<http://www.envirostor.dtsc.ca.gov/public/>), EnviroStor database, accessed December 2011.

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Federal Emergency Management Act (FEMA), Flood Insurance Rate Map (FIRM), Website <http://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1> accessed December 2011.

Kearny Foundation Special Report, “Background Concentrations of Trace and Major Elements in California Soils,” UC Riverside, 1996.

Los Angeles County Public Library (LAPL), Sanborn Maps 1867-1970, Website <http://databases.lapl.org/#s>, accessed December 2011.

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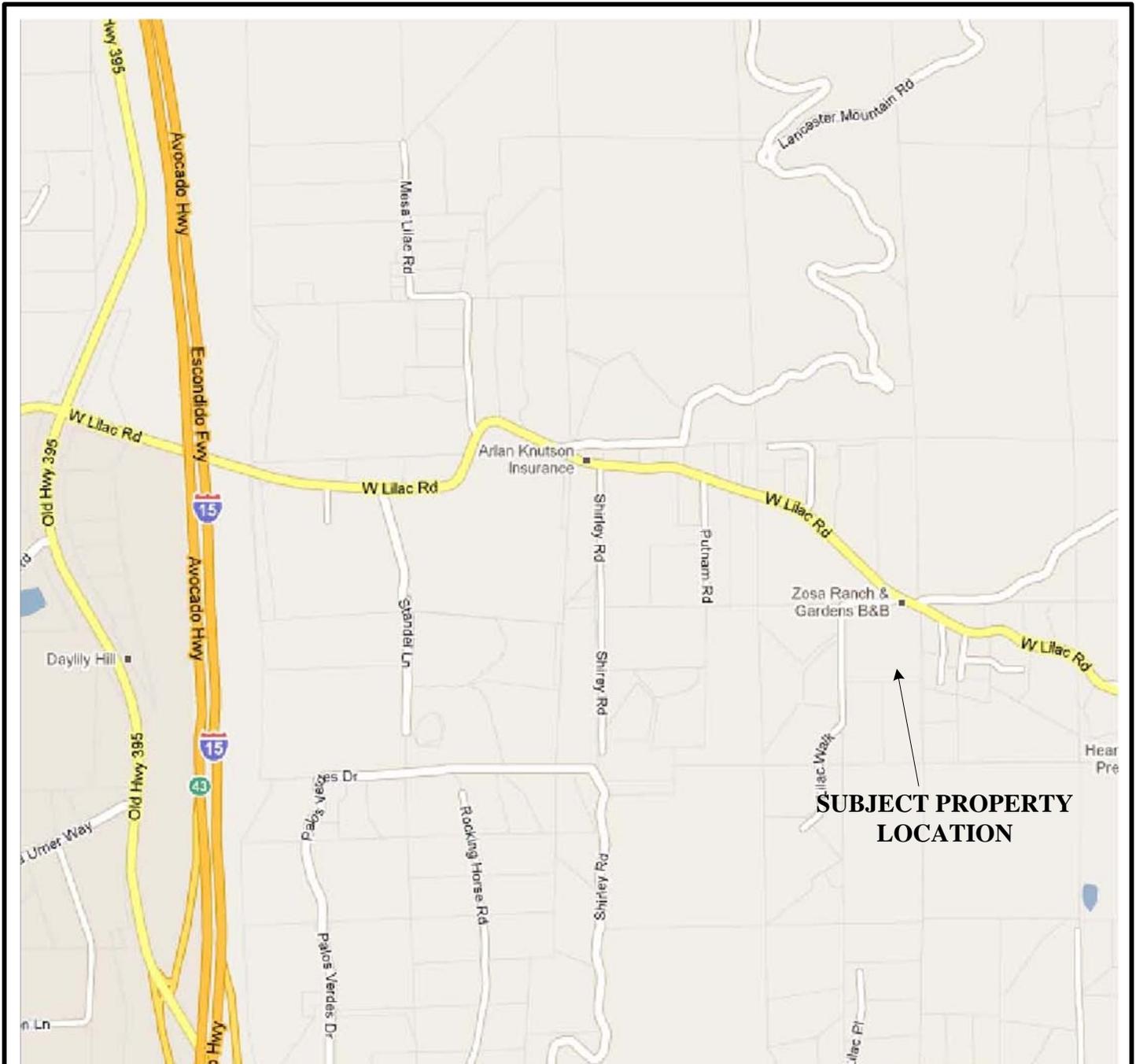
State Water Resources Control Board, Website, GeoTracker database, (<http://www.geotracker.swrcb.ca.gov/>), accessed August 2011.

United Nations Environmental Programme, 1999, Guidelines for the Identification of PCBs and Materials Containing PCBs.

United States Department of Agriculture (USDA), Natural Resources Conservation Service, Website (<http://websoilsurvey.nrcs.usda.gov/app/>) Web Soil Survey, accessed December 2011.

United States Geological Survey (USGS, 1968, photograph inspected 1975, Bonsall, 7.5-Minute Quadrangle.

FIGURES



Map Source: Google Maps®, Accessed, December 2011



Scale: 1" = 1,250'

0 750 FT 1,250 FT 2,500 FT



Note All Locations Are Approximate

SITE LOCATION MAP
ACCRETIVE INVESTMENTS, INC.

5.0-Acre "Carlson" Property
 APN 128-440-06
 9383 West Lilac Road, Escondido, California 92026
 EEI Project No. ACR-71377
 Created December 2011



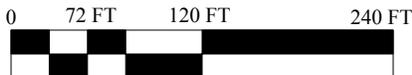
FIGURE 1



Map Source: Accretive Investments, Inc., March 2012



Scale: 1" = 120'



Note All Locations Are Approximate

AERIAL SITE MAP
ACCRETIVE INVESTMENTS, INC.

5.0-Acre "Carlson" Property
APN 128-440-06
9383 West Lilac Road, Escondido, California 92026
EEI Project No. ACR-71377
Revised March 2012



FIGURE 2



Map Source: Accretive Investments, Inc., March 2012

LEGEND

○
ACR-5

Soil Boring Location



Scale: 1" = 120'



Note All Locations Are Approximate

SOIL BORING LOCATION MAP

ACCRETIVE INVESTMENTS, INC.

5.0-Acre "Carlson" Property

APN 128-440-06

9383 West Lilac Road, Escondido, California 92026

EEI Project No. ACR-71377

Updated March 2012



FIGURE 3

**APPENDIX A
RESUME OF ENVIRONMENTAL PROFESSIONAL**



Brian R. Brennan, REA II

Senior Project Manager

As a Senior Project Manager with EEI, Mr. Brennan has been responsible for personnel training, completed Phase I and II Environmental Site Assessments (ESAs); and managed and overseen Underground Storage Tank (UST) remediation projects, as well as chlorinated solvent, pesticide, and heavy metal site investigation and mitigation projects. Mr. Brennan is also responsible for the operation and maintenance of remedial equipment, decontamination, and waste handling.

Respective Projects

Keystone Development, Moreno Valley, CA – Conducted Phase I and II Environmental Site Assessments (ESAs), evaluated environmental concerns for proposed residential community development project on behalf of a Southern California developer.

Bluestone Properties, Westminster, CA – Evaluated and conducted Phase I and II ESA on a commercial shopping center, which was being considered for redevelopment.

Former Exide/GNB Battery Manufacturing Facility, City of Industry, CA – Evaluated Phase I/II ESA data on a former lead/acid battery facility. Conducted Phase II ESA soil sampling and implemented lead/acid impacted soil remediation activities under the supervision of a (California Registered Geologist and County of Los Angeles Fire Department Local Oversight Agency), in an effort to prepare the site for commercial/industrial redevelopment.

Education

Masters of Science, Environmental Engineering, National University, 2008

Bachelor of Arts, Geography – Environmental Analysis and Natural Resource Conservation, San Diego State University, 2000

Professional Registration

California Registered Environmental Assessor (REA-II) No. 07920

Professional Affiliations

American Society of Civil Engineers (ASCE)

National Groundwater Association (NGWA)

Association of Environmental Professionals (AEP)

San Diego Environmental Professionals (SDEP)

Certifications

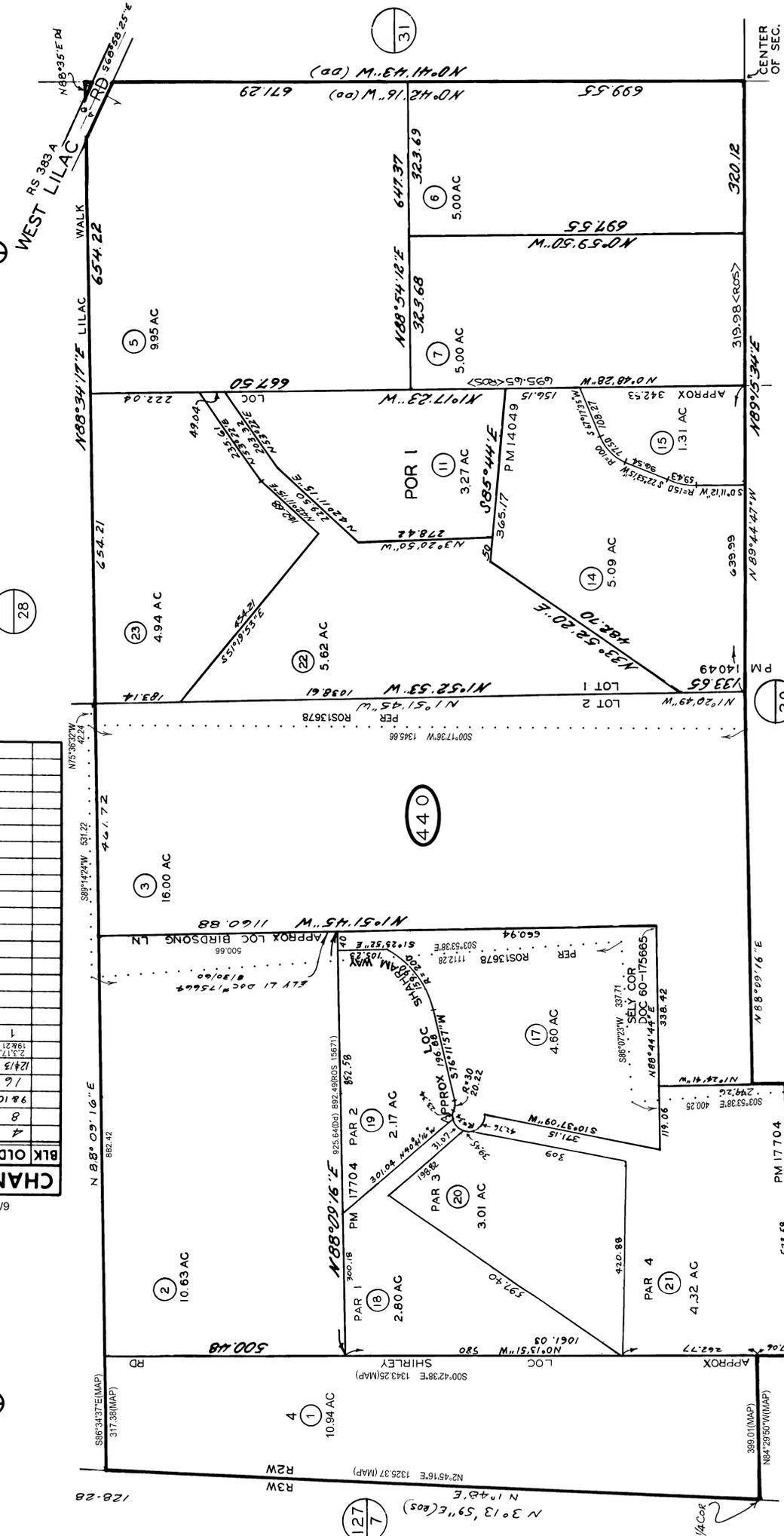
40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER)

AHERA Asbestos Building Inspector

APPENDIX B
SAN DIEGO COUNTY ASSESSOR’S PARCEL MAP

128-44

CHANGES		6/14/2005 SM	
BLK	OLD NEW YR CUT	1	2
4	11-13 25 2359	8	14715 86 1785
		9&10	16&17 96 2027
		16	18-21 97 1729
		12415	22&23 97 1167
		2&3	19&21
		1	19&21
		02	5503
		06	5548
		06	5548



THIS MAP WAS PREPARED FOR ASSESSMENT PURPOSES ONLY. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN. ASSESSOR'S PARCELS MAY NOT COMPLY WITH LOCAL SUBDIVISION OR BUILDING ORDINANCES.

SEC 19 - TIOS - R2W - S 1/2 OF N 1/4
 ROS 4069,9512,11786,13582,13678,15671

SAN DIEGO COUNTY
 ASSESSOR'S MAP
 BOOK 128 PAGE 44

**APPENDIX C
HISTORICAL AERIAL PHOTOGRAPHS/TOPOGRAPHIC MAPS/CITY DIRECTORY**



Environmental FirstSearch

Historical Aerial Photo

2002

9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377 (NAPP-3C_12474-180)
Target Site: 33.294081, -117.130524

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1991

9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377 (AMI-SD-90-91_12576)
Target Site: 33.294081, -117.130524

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1980

9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377 (AMI-SD-80_10235)
Target Site: 33.294081, -117.130524

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1976

9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377 (AMI-SD-76_8432)
Target Site: 33.294081, -117.130524

Approximate Scale: 1 in equals 750 ft

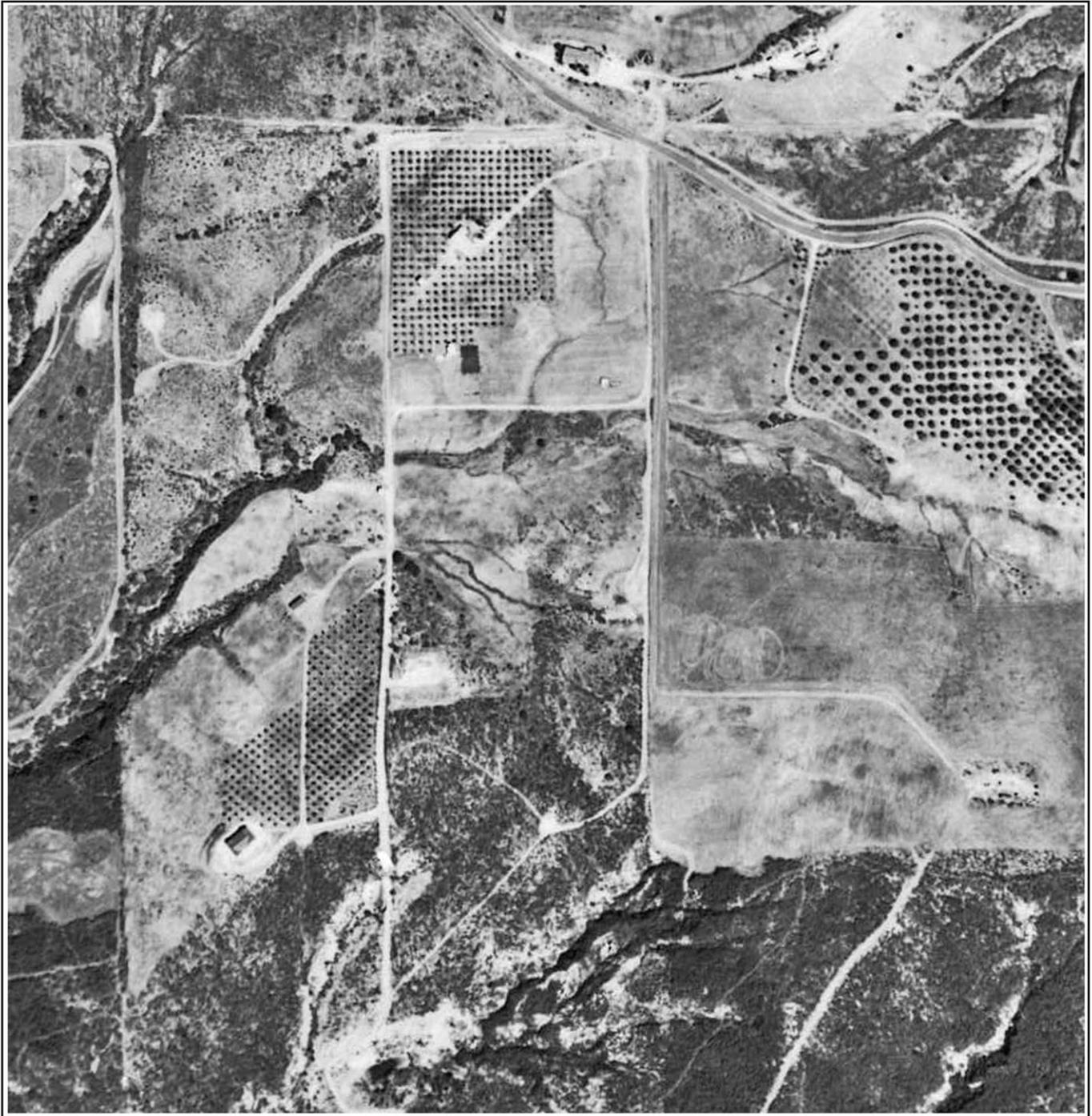


Environmental FirstSearch

Historical Aerial Photo

1963

9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377 (CAS-SD_2-131)
Target Site: 33.294081, -117.130524

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1953

9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377 (AXN-1953_3M-134)
Target Site: 33.294081, -117.130524

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1946

9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377 (GS-CP_9-88)
Target Site: 33.294081, -117.130524

Approximate Scale: 1 in equals 375 ft

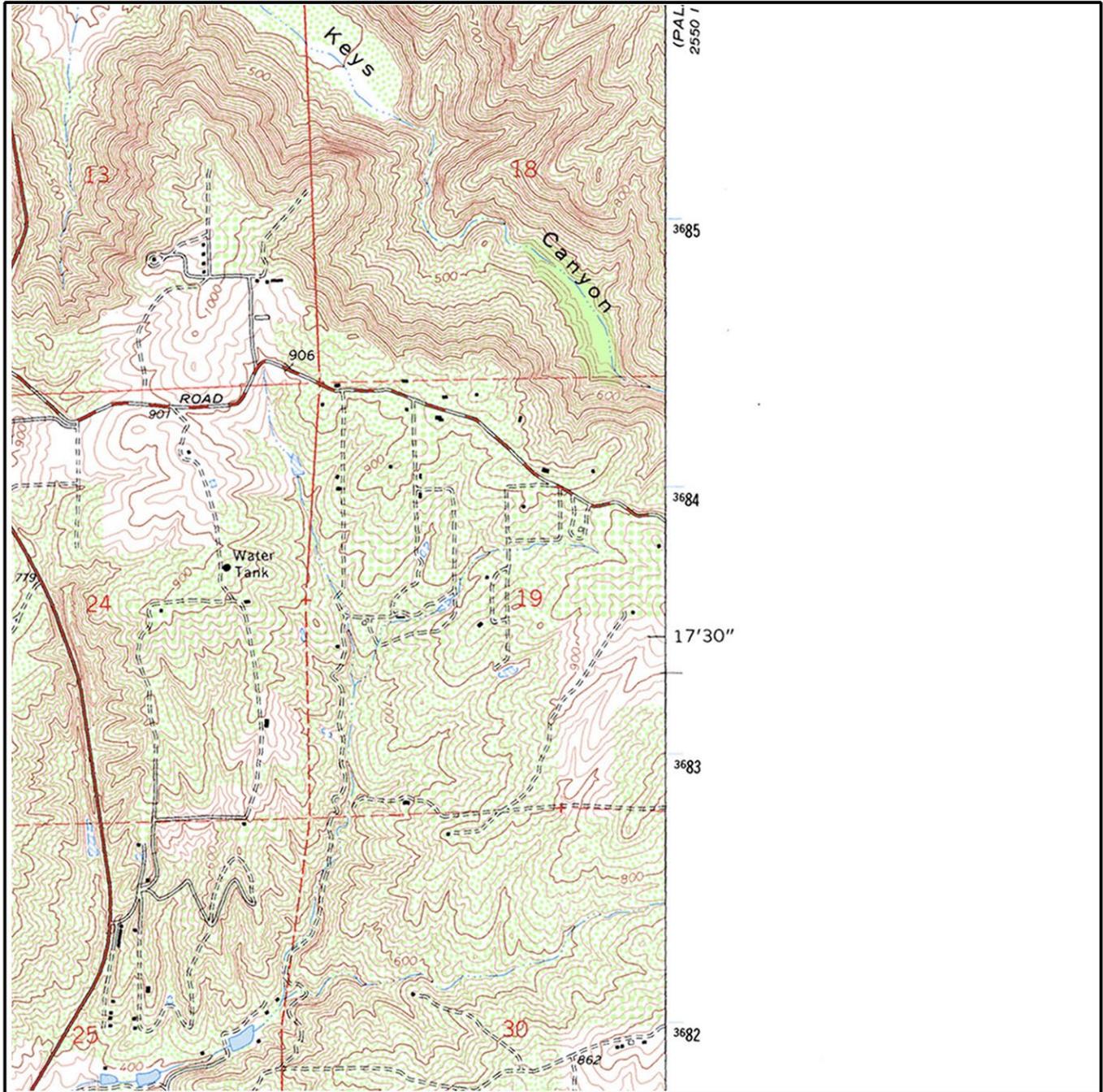


Environmental FirstSearch

Historical Topographic Map

Quad Name: Bonsall, CA
Year: 1975 Original Map Scale: 1:24,000

9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377
Target Site: 33.294081, -117.130524

Building		Railroad	
Topo Contour		Tanks	
Depression		Primary Highway	
Quarry or Open Pit Mine		Trail	

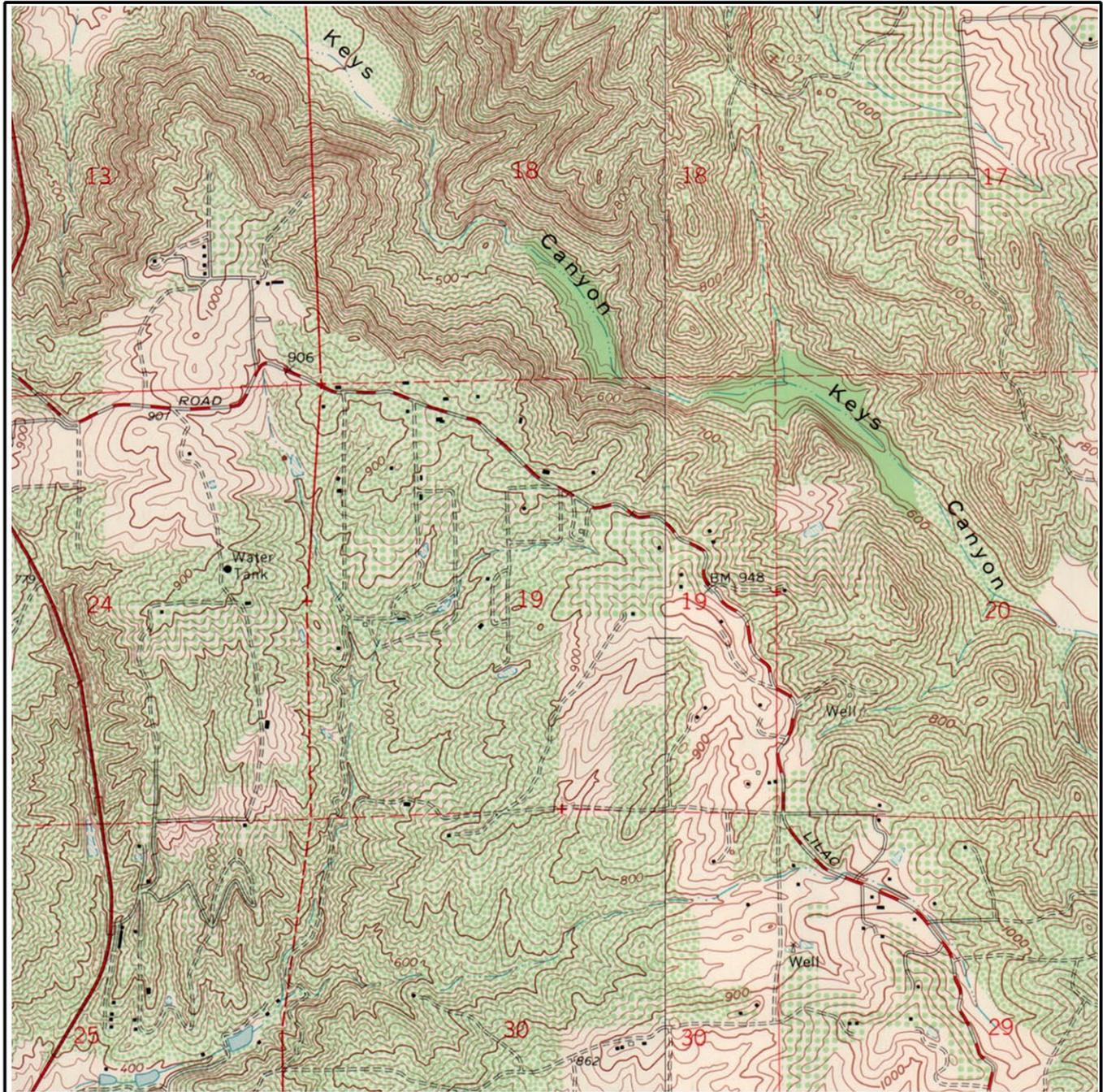


Environmental FirstSearch

Historical Topographic Map

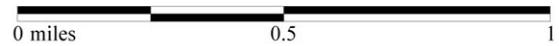


Quad Name: Bonsall, CA
Year: 1968 Original Map Scale: 1:24,000
9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377
Target Site: 33.294081, -117.130524

E Quad Name: Pala, CA
Year: 1968



Building	■ ■ ■ ■ ■ ■ ■ ■ ■ ■	Railroad	—+—+—+—+—+—+—+—+—
Topo Contour	—6000—	Tanks	● ● ● ● ● ● ● ● ● ●
Depression	⊖	Primary Highway	—
Quarry or Open Pit Mine	×	Trail	- - - - -

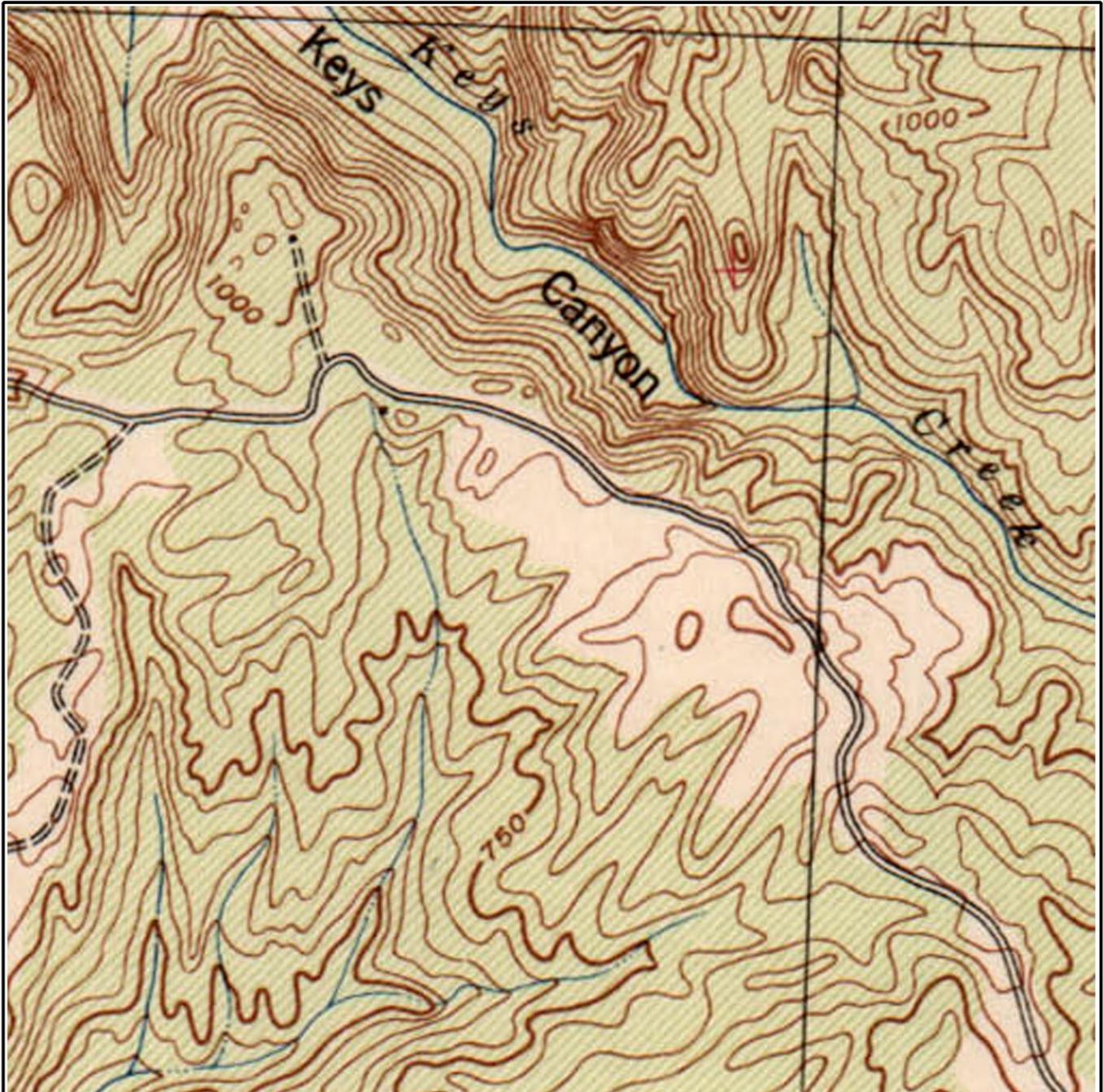


Environmental FirstSearch

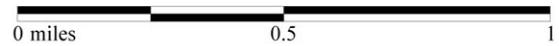
Historical Topographic Map

Quad Name: Temecula, CA
Year: 1942 Original Map Scale: 1:62,500

9383 West Lilac Rd, Escondido, CA 92026



Job Number: ACR-71377
Target Site: 33.294081, -117.130524



Building	■ ■ ■ ■ ■ ■ ■ ■ ■ ■	Railroad	—+—+—+—+—+—+—+—+—+—
Topo Contour	—6000—	Tanks	● ● ● ● ● ● ● ● ● ●
Depression	⊖	Primary Highway	—
Quarry or Open Pit Mine	×	Trail	- - - - -



Prepared for: Brian Brennan – EEI

Client Job No/Name: ACR71377

TIS Log No: 66209

Subject Property:

9383 W. Lilac Rd
Escondido, CA 92026

October 10, 2011

DISCLAIMER

The information contained in this report has been obtained from publicly available sources and other secondary sources of information produced by entities other than Track Info Services, LLC (Track Info Services). Although great care has been taken by Track Info Services in compiling and checking the information contained in this report to insure it is current and accurate, Track Info Services disclaims any and all liability for any errors, omissions, or inaccuracies in such information and data, whether attributable to inadvertence or otherwise, and for any consequences arising therefrom. The data provided hereunder neither purports to be nor constitutes legal or medical advice. It is further understood that Track Info Services makes no responsibility with respect to our customer's, its employees', clients', or customers' use thereof. Track Info Services shall not be liable for any special, consequential, or exemplary damages resulting in whole or in part, from customers' use of the data. Liability on the part of Track Info Services, LLC (Track Info Services) is limited to the monetary value paid for this report. The report is valid only for the geographical parameters specified on the cover page of this report, and any alteration or deviation from this description will require a new report. This report does not constitute a legal or licensed opinion.

Track Info Services City Directory Report
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Addresses of Potential Concern: A summary of gas stations, cleaners, automotive shops, and other address occupants of potential environmental concern located on the subject street, within the vicinity of the target address. The addresses listed are included in the body of the report.

YEAR	ADDRESS	OCCUPANT
<i>No Addresses of Potential Concern identified on the subject street, within vicinity of the Target address.</i>		

Track Info Services City Directory Report
--

2011 Haines: North San Diego County p. 532		
9381 W. Lilac Rd Zosa Ranch & Gardens Bd & Brkfst	9383 W. Lilac Rd Carlson Linda	9417 W. Lilac Rd Murphy David
2007 Haines: North San Diego County p. 479		
9381 W. Lilac Rd Zosa Ranch & Gardens Bd & Brkfst	9383 W. Lilac Rd Address not listed	9417 W. Lilac Rd Kelly David Murphy
2002 Haines: North San Diego County p. 877		
9381 W. Lilac Rd Zosa Gardens & Ranch B & B	9383 W. Lilac Rd Address not listed	9417 W. Lilac Rd Murphy David
1997 Haines: North San Diego County p. 668		
9381 W. Lilac Rd Zosa Ranch	9383 W. Lilac Rd Address not listed	9417 W. Lilac Rd Murphy David
1992 Haines: North San Diego County p. 547		
9381 W. Lilac Rd Zosa Ranch	9383 W. Lilac Rd Address not listed	9417 W. Lilac Rd Murphy David
1986 Haines: North San Diego County p. 470		
9381 W. Lilac Rd Martin Wm; Murphy Roger F	9383 W. Lilac Rd Address not listed	9407 W. Lilac Rd Wolk Chas J
1981 Haines: North San Diego County p. 219		
9137 W. Lilac Rd No Response	9383 W. Lilac Rd Address not listed	9407 W. Lilac Rd Wolk Chas J
1974 Pacific Telephone: Escondido p. 57		
W. Lilac Rd First listing this street 9867	9383 W. Lilac Rd Address not listed	9867 W. Lilac Rd Walker Noel
End Of Search due to: A) earlier directory or street listing not found; B) listing out of range, listings re-numbered, or no numeric listings		

Track Info Services City Directory Report

Notes:

- Subject Property is in bold, the next lowest address on the same side of the street is to the left and the next highest address on the same side of the street is to the right.
- The next lowest and highest addresses are the closest listed for the same side of the street as the target and may or may not be adjacent. They are the closest listed in the source consulted.
- Occupant names and statements such as 'Vacant', 'No info' and 'Under constr' are verbatim.
- Occupant names are listed once per address although they may be listed multiple times in the directory.
- A forward slash between names indicates multiple companies listed under same main company.
- Previous refers to source and entries listed above what is being read.
- The source used is cited in the row above referenced address and occupant.

APPENDIX D
ENVIRONMENTAL RECORDS SEARCH

FirstSearch Technology Corporation

Environmental FirstSearch™ Report

Target Property:

9383 WEST LILAC RD

ESCONDIDO CA 92026

Job Number: ACR-71377

PREPARED FOR:

EEL, Inc.

2195 Faraday Avenue, Suite K

Carlsbad, CA 92008

760.431.3747

10-05-11



Tel: (781) 551-0470

Fax: (781) 551-0471

Environmental FirstSearch Search Summary Report

Target Site: 9383 WEST LILAC RD
ESCONDIDO CA 92026

FirstSearch Summary

Database	Sel	Updated	Radius	Site	1/8	1/4	1/2	1/2>	ZIP	TOTALS
NPL	Y	09-30-11	1.00	0	0	0	0	0	0	0
NPL Delisted	Y	09-30-11	0.50	0	0	0	0	-	0	0
CERCLIS	Y	07-26-11	0.50	0	0	0	0	-	0	0
NFRAP	Y	07-26-11	0.50	0	0	0	0	-	0	0
RCRA COR ACT	Y	07-11-11	1.00	0	0	0	0	0	0	0
RCRA TSD	Y	07-11-11	0.50	0	0	0	0	-	0	0
RCRA GEN	Y	07-11-11	0.25	0	0	0	-	-	0	0
RCRA NLR	Y	07-11-11	0.12	0	0	-	-	-	0	0
Federal Brownfield	Y	07-05-11	0.25	0	0	0	-	-	0	0
ERNS	Y	07-18-11	0.12	0	0	-	-	-	0	0
Tribal Lands	Y	12-01-05	1.00	0	0	0	0	0	1	1
State/Tribal Sites	Y	07-14-11	1.00	0	0	0	0	0	0	0
State Spills 90	Y	06-01-11	0.12	0	0	-	-	-	0	0
State/Tribal SWL	Y	06-01-11	0.50	0	0	0	0	-	0	0
State/Tribal LUST	Y	09-28-11	0.50	0	0	0	0	-	0	0
State/Tribal UST/AST	Y	06-13-11	0.25	0	0	0	-	-	0	0
State/Tribal EC	Y	NA	0.25	0	0	0	-	-	0	0
State/Tribal IC	Y	06-01-11	0.25	0	0	0	-	-	0	0
State/Tribal VCP	Y	07-14-11	0.50	0	0	0	0	-	0	0
State/Tribal Brownfields	Y	NA	0.50	0	0	0	0	-	0	0
State Permits	Y	09-28-11	0.12	0	0	-	-	-	0	0
State Other	Y	07-14-11	0.25	0	0	0	-	-	0	0
Federal IC/EC	Y	08-01-11	0.25	0	0	0	-	-	0	0
HW Manifest	Y	08-02-10	0.12	0	0	-	-	-	0	0
-TOTALS-				0	0	0	0	0	1	1

Notice of Disclaimer

Due to the limitations, constraints, and inaccuracies and incompleteness of government information and computer mapping data currently available to FirstSearch Technology Corp., certain conventions have been utilized in preparing the locations of all federal, state and local agency sites residing in FirstSearch Technology Corp.'s databases. All EPA NPL and state landfill sites are depicted by a rectangle approximating their location and size. The boundaries of the rectangles represent the eastern and western most longitudes; the northern and southern most latitudes. As such, the mapped areas may exceed the actual areas and do not represent the actual boundaries of these properties. All other sites are depicted by a point representing their approximate address location and make no attempt to represent the actual areas of the associated property. Actual boundaries and locations of individual properties can be found in the files residing at the agency responsible for such information.

Waiver of Liability

Although FirstSearch Technology Corp. uses its best efforts to research the actual location of each site, FirstSearch Technology Corp. does not and can not warrant the accuracy of these sites with regard to exact location and size. All authorized users of FirstSearch Technology Corp.'s services proceeding are signifying an understanding of FirstSearch Technology Corp.'s searching and mapping conventions, and agree to waive any and all liability claims associated with search and map results showing incomplete and or inaccurate site locations.

***Environmental FirstSearch
Site Information Report***

Request Date: 10-05-11
Requestor Name: BRIAN BRENNAN
Standard: ASTM-05

Search Type: COORD
Job Number: ACR-71377
Filtered Report

Target Site: 9383 WEST LILAC RD
 ESCONDIDO CA 92026

Demographics

Sites: 1	Non-Geocoded: 1	Population: NA
Radon: 0.4 PCI/L		

Site Location

	<u>Degrees (Decimal)</u>	<u>Degrees (Min/Sec)</u>	<u>UTMs</u>
Longitude:	-117.130524	-117:7:50	Easting: 487847.333
Latitude:	33.294081	33:17:39	Northing: 3683705.028
Elevation:	843		Zone: 11

Comment

Comment:

Additional Requests/Services

Adjacent ZIP Codes:					Services:		
<u>ZIP Code</u>	<u>City Name</u>	<u>ST</u>	<u>Dist/Dir</u>	<u>Sel</u>	<u>Requested?</u>	<u>Date</u>	
					Fire Insurance Maps	No	
					Aerial Photographs	Yes	10-05-11
					Historical Topos	Yes	10-05-11
					City Directories	Yes	10-05-11
					Title Search	No	
					Municipal Reports	No	
					Liens	No	
					Historic Map Works	No	
					Online Topos	Yes	10-05-11

***Environmental FirstSearch
Target Site Summary Report***

Target Property: 9383 WEST LILAC RD
ESCONDIDO CA 92026

JOB: ACR-71377

TOTAL: 1 **GEOCODED:** 0 **NON GEOCODED:** 1 **SELECTED:** 0

<u>Map ID</u>	<u>DB Type</u>	<u>Site Name/ID/Status</u>	<u>Address</u>	<u>Dist/Dir</u>	<u>ElevDiff</u>	<u>Page No.</u>
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No sites found for target address

***Environmental FirstSearch
Sites Summary Report***

Target Property: 9383 WEST LILAC RD
ESCONDIDO CA 92026

JOB: ACR-71377

TOTAL: 1 **GEOCODED:** 0 **NON GEOCODED:** 1 **SELECTED:** 0

Map ID	DB Type	Site Name/ID/Status	Address	Dist/Dir	ElevDiff	Page No.
	TRIBALLA	BUREAU OF INDIAN AFFAIRS CONTACT I BIA-92026/	UNKNOWN CA 92026	NON GC	N/A	2

Environmental FirstSearch
Site Detail Report

Target Property: 9383 WEST LILAC RD
ESCONDIDO CA 92026

JOB: ACR-71377

No sites were found!

**Environmental FirstSearch
Site Detail Report**

Target Property: 9383 WEST LILAC RD
ESCONDIDO CA 92026

JOB: ACR-71377

TRIBALLAND

SEARCH ID:	1	DIST/DIR:	NON GC	ELEVATION:	MAP ID:
NAME:	BUREAU OF INDIAN AFFAIRS CONTACT INFORMATION	REV:	01/15/08	ID1:	BIA-92026
ADDRESS:	UNKNOWN CA 92026 SAN DIEGO	ID2:		STATUS:	
CONTACT:		PHONE:			
SOURCE:	BIA				

BUREAU OF INDIAN AFFAIRS CONTACT INFORMATION

OFFICE: Pacific Regional Office
CONTACT: CLAY GREGORY,REGIONAL DIRECTOR

OFFICE ADDRESS: 2800 Cottage Way
Sacramento CA 95825
OFFICE PHONE: Phone: 916-978-6000
OFFICE FAX: Fax: 916-978-6099

The Native American Consultation Database (NACD) is a tool for identifying consultation contacts for Indian tribes, Alaska Native villages and corporations, and Native Hawaiian organizations. The database is not a comprehensive source of information, but it does provide a starting point for the consultation process by identifying tribal leaders and NAGPRA contacts. This database can be accessed online at the following web address <http://home.nps.gov/nacd/>

Environmental FirstSearch Descriptions

NPL: EPA NATIONAL PRIORITY LIST - The National Priorities List is a list of the worst hazardous waste sites that have been identified by Superfund. Sites are only put on the list after they have been scored using the Hazard Ranking System (HRS), and have been subjected to public comment. Any site on the NPL is eligible for cleanup using Superfund Trust money. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the Environmental Protection Agency (EPA) as a candidate for cleanup because it poses a risk to human health and/or the environment.**FINAL** - Currently on the Final NPL**PROPOSED** - Proposed for NPL

NPL DELISTED: EPA NATIONAL PRIORITY LIST Subset - Database of delisted NPL sites. The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.**DELISTED** - Deleted from the Final NPL

CERCLIS: EPA COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY INFORMATION SYSTEM (CERCLIS)- CERCLIS is a database of potential and confirmed hazardous waste sites at which the EPA Superfund program has some involvement. It contains sites that are either proposed to be or are on the National Priorities List (NPL) as well as sites that are in the screening and assessment phase for possible inclusion on the NPL.**PART OF NPL**- Site is part of NPL site**DELETED** - Deleted from the Final NPL**FINAL** - Currently on the Final NPL**NOT PROPOSED** - Not on the NPL**NOT VALID** - Not Valid Site or Incident**PROPOSED** - Proposed for NPL**REMOVED** - Removed from Proposed NPL**SCAN PLAN** - Pre-proposal Site**WITHDRAWN** - Withdrawn

NFRAP: EPA COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY INFORMATION SYSTEM ARCHIVED SITES - database of Archive designated CERCLA sites that, to the best of EPA's knowledge, assessment has been completed and has determined no further steps will be taken to list this site on the National Priorities List (NPL). This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.**NFRAP** – No Further Remedial Action Plan**P** - Site is part of NPL site**D** - Deleted from the Final NPL**F** - Currently on the Final NPL**N** - Not on the NPL**O** - Not Valid Site or Incident**P** - Proposed for NPL**R** - Removed from Proposed NPL**S** - Pre-proposal Site**W** – Withdrawn

RCRA COR ACT: EPA RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM SITES - Database of hazardous waste information contained in the Resource Conservation and Recovery Act Information (RCRAInfo), a national program management and inventory system about hazardous waste handlers. In general, all generators, transporters, treaters, storers, and disposers of hazardous waste are required to provide information about their activities to state environmental agencies. These agencies, in turn pass on the information to regional and national EPA offices. This regulation is governed by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984.**RCRAInfo** facilities that have reported violations and subject to corrective actions.

RCRA TSD: EPA RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM TREATMENT, STORAGE, and DISPOSAL FACILITIES. - Database of hazardous waste information contained in the Resource Conservation and Recovery Act Information (RCRAInfo), a national program management and inventory system about hazardous waste handlers. In general, all generators, transporters, treaters, storers, and disposers of hazardous waste are

required to provide information about their activities to state environmental agencies. These agencies, in turn pass on the information to regional and national EPA offices. This regulation is governed by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984. Facilities that treat, store, dispose, or incinerate hazardous waste.

RCRA GEN: EPA/MA DEP/CT DEP RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM GENERATORS - Database of hazardous waste information contained in the Resource Conservation and Recovery Act Information (RCRAInfo), a national program management and inventory system about hazardous waste handlers. In general, all generators, transporters, treaters, storers, and disposers of hazardous waste are required to provide information about their activities to state environmental agencies. These agencies, in turn pass on the information to regional and national EPA offices. This regulation is governed by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984. Facilities that generate or transport hazardous waste or meet other RCRA requirements. **LGN - Large Quantity Generators** **SGN - Small Quantity Generators** **VGN – Conditionally Exempt Generator.** Included are RAATS (RCRA Administrative Action Tracking System) and CMEL (Compliance Monitoring & Enforcement List) facilities. **CONNECTICUT HAZARDOUS WASTE MANIFEST –** Database of all shipments of hazardous waste within, into or from Connecticut. The data includes date of shipment, transporter and TSD info, and material shipped and quantity. This data is appended to the details of existing generator records. **MASSACHUSETTES HAZARDOUS WASTE GENERATOR –** database of generators that are regulated under the MA DEP. **VQN-MA =** generates less than 220 pounds or 27 gallons per month of hazardous waste or waste oil. **SQN-MA =** generates 220 to 2,200 pounds or 27 to 270 gallons per month of waste oil. **LQG-MA =** generates greater than 2,200 lbs of hazardous waste or waste oil per month.

RCRA NLR: EPA RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM SITES - Database of hazardous waste information contained in the Resource Conservation and Recovery Act Information (RCRAInfo), a national program management and inventory system about hazardous waste handlers. In general, all generators, transporters, treaters, storers, and disposers of hazardous waste are required to provide information about their activities to state environmental agencies. These agencies, in turn pass on the information to regional and national EPA offices. This regulation is governed by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984. not currently classified by the EPA but are still included in the RCRAInfo database. Reasons for non classification: Failure to report in a timely matter. No longer in business. No longer in business at the listed address. No longer generating hazardous waste materials in quantities which require reporting.

Fed Brownfield: EPA BROWNFIELD MANAGEMENT SYSTEM (BMS) - database designed to assist EPA in collecting, tracking, and updating information, as well as reporting on the major activities and accomplishments of the various Brownfield grant Programs. **CLEANUPS IN MY COMMUNITY (subset)** - Sites, facilities and properties that have been contaminated by hazardous materials and are being, or have been, cleaned up under EPA's brownfield's program.

ERNS: EPA/NRC EMERGENCY RESPONSE NOTIFICATION SYSTEM (ERNS) - Database of incidents reported to the National Response Center. These incidents include chemical spills, accidents involving chemicals (such as fires or explosions), oil spills, transportation accidents that involve oil or chemicals, releases of radioactive materials, sightings of oil sheens on bodies of water, terrorist incidents involving chemicals, incidents where illegally dumped chemicals have been found, and drills intended to prepare responders to handle these kinds of incidents. Data since January 2001 has been received from the National Response System database as the EPA no longer maintains this data.

Tribal Lands: DOI/BIA INDIAN LANDS OF THE UNITED STATES - Database of areas with boundaries established by treaty, statute, and (or) executive or court order, recognized by the Federal Government as territory in which American Indian tribes have primary governmental authority. The Indian Lands of the United States map layer shows areas of 640 acres or more, administered by the Bureau of Indian Affairs. Included are Federally-administered lands within a reservation which may or may not be considered part of the reservation. BUREAU OF INDIAN AFFIARS CONTACT - Regional contact information for the Bureau of Indian Affairs offices.

State/Tribal Sites: CA EPA SMBRPD / CAL SITES- The California Department of Toxic Substances Control (DTSC) has developed an electronic database system called Envirostor with information about sites that are known to be contaminated with hazardous substances as well as information on uncharacterized properties where further studies may reveal problems. The Site Mitigation and Brownfields Reuse Program Database (SMBRPD), formerly known as CalSites, is used primarily by DTSC's staff as an informational tool to evaluate and track activities at properties that may have been affected by the release of hazardous substances. The SMBRPD displays information in six categories, two of which are found in ST. The categories listed under ST are: 1. State Response Sites. 2. School Property Evaluation Program Properties (SCH) Please Note: Our reports list the above sites as DB Type (STATE). Other categories found in the SMBRPD are listed in our reports in the DB Types OT and VC. Each Category contains information on properties based upon the type of work taking place at the site. State Response Sites contains only known and potential hazardous substance release sites considered as posing the greatest threat to the public. School sites included in ST will be found within the SMBRPD's School Property Evaluation Program. CORTESE LIST-Pursuant to Government Code Section 65962.5, the Hazardous Waste and Substances Sites List has been compiled by Cal/EPA, Hazardous Materials Data Management Program to provide information about the location of hazardous materials release sites. Cortese List sites that fall under DTSC's guidelines for State Response sites are included in our reports in the ST category as are qualifying sites from the Annual Work Plan (formerly Bond Expenditure Plan) and the historic ASPIS databases.

State Spills 90: CA EPA SLIC REGIONS 1 - 9- The California Regional Water Quality Control Boards maintain report of sites that have records of spills, leaks, investigation, and cleanups.

State/Tribal SWL: CA IWMB/SWRCB/COUNTY SWIS SOLID WASTE INFORMATION SYSTEM-The California Integrated Waste Management Board maintains a database on solid waste facilities, operations, and disposal sites throughout the state of California. The types of facilities found in this database include landfills, transfer stations, material recovery facilities, composting sites, transformation facilities, waste tire sites, and closed disposal sites. For more information on individual sites call the number listed in the source field.. Please Note: This database contains poor site location information for many sites in our reports; therefore, it may not be possible to locate or plot some sites in our reports. WMUDS-The State Water Resources Control Board maintained the Waste Management Unit Database System (WMUDS). It is no longer updated. It tracked management units for several regulatory programs related to waste management and its potential impact on groundwater. Two of these programs (SWAT & TPCA) are no longer on-going regulatory programs as described below. Chapter 15 (SC15) is still an on-going regulatory program and information is updated periodically but not to the WMUDS database. The WMUDS System contains information from the following agency databases: Facility, Waste Management Unit (WMU), Waste Discharger System (WDS), SWAT, Chapter 15, TPCA, RCRA, Inspections, Violations, and Enforcement's. Note: This database contains poor site location information for many sites in our reports; therefore, it may not be possible to locate or plot some sites in reports. ORANGE COUNTY LANDFILLS LIST- A list maintained by the Orange County Health Department.

State/Tribal LUST: CA SWRCB/COUNTY LUSTIS- The State Water Resources Control Board maintains a database of sites with confirmed or unconfirmed leaking underground storage tanks. Information for this database is collected from the states regional boards quarterly and integrated with this database. SAN DIEGO COUNTY LEAKING TANKS- The San Diego County Department of Environmental Health maintains a database of sites with confirmed or unconfirmed leaking underground storage tanks within its HE17/58 database. For more information on a specific file call the HazMat Duty Specialist at phone number listed in the source information field.

State/Tribal UST/AST: CA EPA/COUNTY/CITY ABOVEGROUND STORAGE TANKS LISTING-The Above Ground Petroleum Storage Act became State Law effective January 1, 1990. In general, the law requires owners or operators of AST's with petroleum products to file a storage statement and pay a fee by July 1, 1990 and every two years thereafter, take specific action to prevent spills, and in certain instances implement a groundwater monitoring program. This law does not apply to that portion of a tank facility associated with the production oil and regulated by the State Division of Oil and Gas of the Dept. of Conservation. SWEEPS / FIDS STATE REGISTERED UNDEGROUND STORAGE TANKS- Until 1994 the State Water Resources Control Board maintained a database of registered underground storage tanks statewide referred to as the SWEEPS System. The SWEEPS UST information was integrated with the CAL EPA's Facility Index System database (FIDS) which is a master index of information from numerous California agency environmental databases. That was last updated in 1994. We have included the UST information from the FIDS database in our reports for historical purposes to help our clients identify where tanks may possibly have existed. For more information on specific sites from individual paper files archived at the State Water Resources Control Board call the number listed with the source information. INDIAN LANDS UNDERGROUND STORAGE TANKS LIST- A listing of underground storage tanks currently on Indian Lands under federal jurisdiction. California Indian Land USTS are administered by US EPA Region 9.CUPA DATABASES & SOURCES- Definition of a CUPA: A Certified Unified Program Agency (CUPA) is a local agency that has been certified by the CAL EPA to implement six state environmental programs within the local agency's jurisdiction. These can be a county, city, or JPA (Joint Powers Authority). This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. A Participating Agency (PA) is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. A Designated Agency (DA) is an agency that has not been certified by the CUPA but is the responsible local agency that would implement the six unified programs until they are certified. Please Note: We collect and maintains information regarding Underground Storage Tanks from the majority of the CUPAS and Participating Agencies in the State of California. These agencies typically do not maintain nor release such information on a uniform or consistent schedule; therefore, currency of the data may vary. Please look at the details on a specific site with a UST record in the First Search Report to determine the actual currency date of the record as provided by the relevant agency. Numerous efforts are made on a regular basis to obtain updated records.

State/Tribal IC: CA EPA DEED-RESTRICTED SITES LISTING- The California EPA's Department of Toxic Substances Control Board maintains a list of deed-restricted sites, properties where the DTSC has placed limits or requirements on the future use of the property due to varying levels of cleanup possible, practical or necessary at the site.

State/Tribal VCP: CA EPA SMBRPD / CAL SITES- The California Department of Toxic Substances Control (DTSC) has developed an electronic database system called Envirostor with information about sites that are known to be contaminated with hazardous substances as well as information on uncharacterized properties where further studies may reveal problems. The Site Mitigation and Brownfields Reuse Program Database (SMBRPD), formerly known as CalSites, is used primarily by DTSC's staff as an informational tool to evaluate and track activities at properties that may have been affected by the release of hazardous substances. The Voluntary Cleanup Program (VCP) category contains only those

properties undergoing voluntary investigation and/or cleanup and which are listed in the Voluntary Cleanup Program. Please Note: Our reports list the above sites as DB Type VC.

State Permits: CA EPA/COUNTY SAN DIEGO COUNTY HE17 PERMITS- The HE17/58 database tracks establishments issued permits and the status of their permits in relation to compliance with federal, state, and local regulations that the County oversees. It tracks if a site is a hazardous waste generator, TSD, gas station, has underground tanks, violations, or unauthorized releases. For more information on a specific file call the HazMat Duty Specialist at the phone number listed in the source information field. **SAN BERNARDINO COUNTY HAZARDOUS MATERIALS PERMITS-** Handlers and Generators Permit Information Maintained by the Hazardous Materials Division.

State Other: CA EPA/COUNTY SMBRPD / CAL SITES- The California Department of Toxic Substances Control (DTSC) has developed an electronic database system called Envirostor with information about sites that are known to be contaminated with hazardous substances as well as information on uncharacterized properties where further studies may reveal problems. The Site Mitigation and Brownfields Reuse Program Database (SMBRPD), formerly known as CalSites, is used primarily by DTSC's staff as an informational tool to evaluate and track activities at properties that may have been affected by the release of hazardous substances. The SMBRPD displays information in six categories, two of which are found in ST. The categories listed under OT are: 1. Unconfirmed Properties Referred to Another Local or State Agency (REF) 2. Properties where a No Further Action Determination has been made (NFA) Please Note: Our reports list the above sites as DB Type (OTHER). Other categories found in the SMBRPD are listed in our reports in the DB Types ST and VC. **LA COUNTY SITE MITIGATION COMPLAINT CONTROL LOG-** The County of Los Angeles Public Health Investigation Compliant Control Log. **ORANGE COUNTY INDUSTRIAL SITE CLEANUPS-** List maintained by the Orange County Environmental Health Agency. **RIVERSIDE COUNTY WASTE GENERATORS-**A list of facilities in Riverside County which generate hazardous waste. **SACRAMENTO COUNTY MASTER HAZMAT LIST-**Master list of facilities within Sacramento County with potentially hazardous materials. **SACRAMENTO COUNTY TOXIC SITE CLEANUPS-**A list of sites where unauthorized releases of potentially hazardous materials have occurred.

Federal IC / EC: EPA FEDERAL ENGINEERING AND INSTITUTIONAL CONTROLS- Superfund sites that have either engineering or an institutional control. The data includes the control and the media contaminated. **RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM SITES (RCRA) –** RCRA site that have institutional controls.

State/Tribal HW: CA EPA DEPARTMENT OF TOXIC SUBSTANCES CONTROL HAZARDOUS WASTE MANIFEST INVENTORY-Records maintained by the CA DTSC of Hazardous Waste Manifests used to track and document the transport of hazardous waste from a generator's site to the site of its final disposition.

Environmental FirstSearch Database Sources

NPL: EPA Environmental Protection Agency

Updated quarterly

NPL DELISTED: EPA Environmental Protection Agency

Updated quarterly

CERCLIS: EPA Environmental Protection Agency

Updated quarterly

NFRAP: EPA Environmental Protection Agency.

Updated quarterly

RCRA COR ACT: EPA Environmental Protection Agency.

Updated quarterly

RCRA TSD: EPA Environmental Protection Agency.

Updated quarterly

RCRA GEN: EPA/MA DEP/CT DEP Environmental Protection Agency, Massachusetts Department of Environmental Protection, Connecticut Department of Environmental Protection

Updated quarterly

RCRA NLR: EPA Environmental Protection Agency

Updated quarterly

Fed Brownfield: EPA Environmental Protection Agency

Updated quarterly

ERNS: EPA/NRC Environmental Protection Agency National Response Center.

Updated annually

Tribal Lands: DOI/BIA United States Department of the Interior Bureau of Indian Affairs

Updated annually

State/Tribal Sites: CA EPA The CAL EPA, Depart. Of Toxic Substances Control Phone: (916) 323-3400 For Cortese List information contact The CAL EPA, Department of Toxic Substances Control at (916) 445-6532

Updated quarterly/when available

State Spills 90: CA EPA The California State Water Resources Control Board For phone number listings of departments within each region visit their web sites at: <http://www.swrcb.ca.gov/regions.html>

Updated when available

State/Tribal SWL: CA IWMB/SWRCB/COUNTY The California Integrated Waste Management Board

Phone:(916) 255-2331

The State Water Resources Control Board

Phone:(916) 227-4365

Orange County Health Department

Phone:(714) 834-3536

Updated quarterly/when available

State/Tribal LUST: CA SWRCB/COUNTY The California State Water Resources Control Board Phone:(916) 227-4416

San Diego County Department of Environmental Health Phone:(619) 338-2242

Updated quarterly/when available

State/Tribal UST/AST: CA EPA/COUNTY/CITY The State Water Resources Control Board

Phone:(916) 227-4364

CAL EPA Department of Toxic Substances Control

Phone:(916)227-4404

US EPA Region 9 Underground Storage Tank Program

Phone: (415) 972-3372

ALAMEDA COUNTY CUPAS:

* County of Alameda Department of Environmental Health

* Cities of Berkeley, Fremont, Hayward, Livermore / Pleasanton, Newark, Oakland, San Leandro, Union

ALPINE COUNTY CUPA:

* Health Department (Only updated by agency sporadically)

AMADOR COUNTY CUPA:

* County of Amador Environmental Health Department

BUTTE COUNTY CUPA

* County of Butte Environmental Health Division (Only updated by agency biannually)

CALAVERAS COUNTY CUPA:

* County of Calaveras Environmental Health Department

COLUSA COUNTY CUPA:

* Environmental Health Dept.

CONTRA COSTA COUNTY CUPA:

* Hazardous Materials Program

DEL NORTE COUNTY CUPA:

* Department of Health and Social Services

EL DORADO COUNTY CUPAS:

* County of El Dorado Environmental Health - Solid Waste Div (Only updated by agency annually)

* County of El Dorado EMD Tahoe Division (Only updated by agency annually)

FRESNO COUNTY CUPA:

* Haz. Mat and Solid Waste Programs

GLENN COUNTY CUPA:

* Air Pollution Control District

HUMBOLDT COUNTY CUPA:

* Environmental Health Division

IMPERIAL COUNTY CUPA:

* Department of Planning and Building

INYO COUNTY CUPA:

* Environmental Health Department

KERN COUNTY CUPA:

* County of Kern Environmental Health Department

* City of Bakersfield Fire Department

KINGS COUNTY CUPA:

* Environmental Health Services

LAKE COUNTY CUPA:

* Division of Environmental Health

LASSEN COUNTY CUPA:

* Department of Agriculture

LOS ANGELES COUNTY CUPAS:

* County of Los Angeles Fire Department CUPA Data as maintained by the Los Angeles County Department of Public Works

* County of Los Angeles Environmental Programs Division

* Cities of Burbank, El Segundo, Glendale, Long Beach/Signal Hill, Los Angeles, Pasadena, Santa Fe Springs, Santa Monica, Torrance, Vernon

MADERA COUNTY CUPA:

* Environmental Health Department

MARIN COUNTY CUPA:

* County of Marin Office of Waste Management

* City of San Rafael Fire Department

MARIPOSA COUNTY CUPA:

* Health Department

MENDOCINO COUNTY CUPA:

* Environmental Health Department

MERCED COUNTY CUPA:

- * Division of Environmental Health

MODOC COUNTY CUPA:

- * Department of Agriculture

MONO COUNTY CUPA:

- * Health Department

MONTEREY COUNTY CUPA:

- * Environmental Health Division

NAPA COUNTY CUPA:

- * Hazardous Materials Section

NEVADA COUNTY CUPA:

- * Environmental Health Department

ORANGE COUNTY CUPAS:

- * County of Orange Environmental Health Department
- * Cities of Anaheim, Fullerton, Orange, Santa Ana
- * County of Orange Environmental Health Department

PLACER COUNTY CUPAS:

- * County of Placer Division of Environmental Health Field Office
- * Tahoe City
- * City of Roseville Roseville Fire Department

PLUMAS COUNTY CUPA:

- * Environmental Health Department

RIVERSIDE COUNTY CUPA:

- * Environmental Health Department

SACRAMENTO COUNTY CUPA:

- * County Environmental Mgmt Dept, Haz. Mat. Div.

SAN BENITO COUNTY CUPA:

- * City of Hollister Environmental Service Department

SAN BERNARDINO COUNTY CUPAS:

- * County of San Bernardino Fire Department, Haz. Mat. Div.
- * City of Hesperia Hesperia Fire Prevention Department
- * City of Victorville Victorville Fire Department

SAN DIEGO COUNTY CUPA:

- * The San Diego County Dept. of Environmental Health HE 17/58

SAN FRANCISCO COUNTY CUPA:

- * Department of Public Health

SAN JOAQUIN COUNTY CUPA:

- * Environmental Health Division

SAN LUIS OBISPO COUNTY CUPAS:

- * County of San Luis Obispo Environmental Health Division
- * City of San Luis Obispo City Fire Department

SAN MATEO COUNTY CUPA:

- * Environmental Health Department

SANTA BARBARA COUNTY CUPA:

- * County Fire Dept Protective Services Division
- SANTA CLARA COUNTY CUPAS:
 - * County of Santa Clara Hazardous Materials Compliance Division
 - * Santa Clara County Central Fire Protection District (Covers Campbell, Cupertino, Los Gatos, & Morgan Hill)
 - * Cities of Gilroy, Milpitas, Mountain View, Palo Alto, San Jose Fire, Santa Clara, Sunnyvale
- SANTA CRUZ COUNTY CUPA:
 - * Environmental Health Department
- SHASTA COUNTY CUPA:
 - * Environmental Health Department
- SIERRA COUNTY CUPA:
 - * Health Department
- SISKIYOU COUNTY CUPA:
 - * Environmental Health Department
- SONOMA COUNTY CUPAS:
 - * County of Sonoma Department Of Environmental Health
 - * Cities of Healdsburg / Sebastopol, Petaluma, Santa Rosa
- STANISLAUS COUNTY CUPA:
 - * Department of Environmental Resources Haz. Mat. Division
- SUTTER COUNTY CUPA:
 - * Department of Agriculture
- TEHAMA COUNTY CUPA:
 - * Department of Environmental Health
- TRINITY COUNTY CUPA:
 - * Department of Health
- TULARE COUNTY CUPA:
 - * Environmental Health Department
- TUOLUMNE COUNTY CUPA:
 - * Environmental Health
- VENTURA COUNTY CUPAS:
 - * County of Ventura Environmental Health Division
 - * Cities of Oxnard, Ventura
- YOLO COUNTY CUPA:
 - * Environmental Health Department
- YUBA COUNTY CUPA:
 - * Yuba County of Emergency Services

Updated quarterly/annually/when available

State/Tribal IC: CA EPA The California EPA Department of Toxic Substances Control.Phone:(916) 255-3745

Updated Updated quarterly/annually/when available

State/Tribal VCP: CA EPA The California EPA Department of Toxic Substances Control.Phone:(916) 255-3745

Updated Updated quarterly/annually/when available

State Permits: CA EPA/COUNTY The San Diego County Depart. Of Environmental Health Phone:(619) 338-2211 San Bernardino County Fire Department Phone:(909) 387-3080

Updated quarterly/when available

State Other: CA EPA/COUNTY The CAL EPA, Depart. Of Toxic Substances Control Phone: (916) 323-3400 The Los Angeles County Hazardous Materials Division Phone: (323) 890-7806 Orange County Environmental Health Agency Phone: (714) 834-3536 Riverside County Department of Environmental Health, Hazardous Materials Management Division Phone:(951) 358-5055 Sacramento County Environmental Management Department Phone: (916) 875-8550

Updated quarterly/when available

Federal IC / EC: EPA Environmental Protection Agency

Updated quarterly

State/Tribal HW: CA EPA CAL EPA, Department of Toxic Substances Control Phone:(916) 255-087

Updated annually/when available

Environmental FirstSearch
Street Name Report for Streets within .25 Mile(s) of Target Property

Target Property: 9383 WEST LILAC RD
ESCONDIDO CA 92026

JOB: ACR-71377

Street Name	Dist/Dir	Street Name	Dist/Dir
Lilac Walk	0.09 SW		
Putnam Rd	0.22 SW		
W Lilac Rd	0.17 NW		
WEST LILAC RD	0.00--		



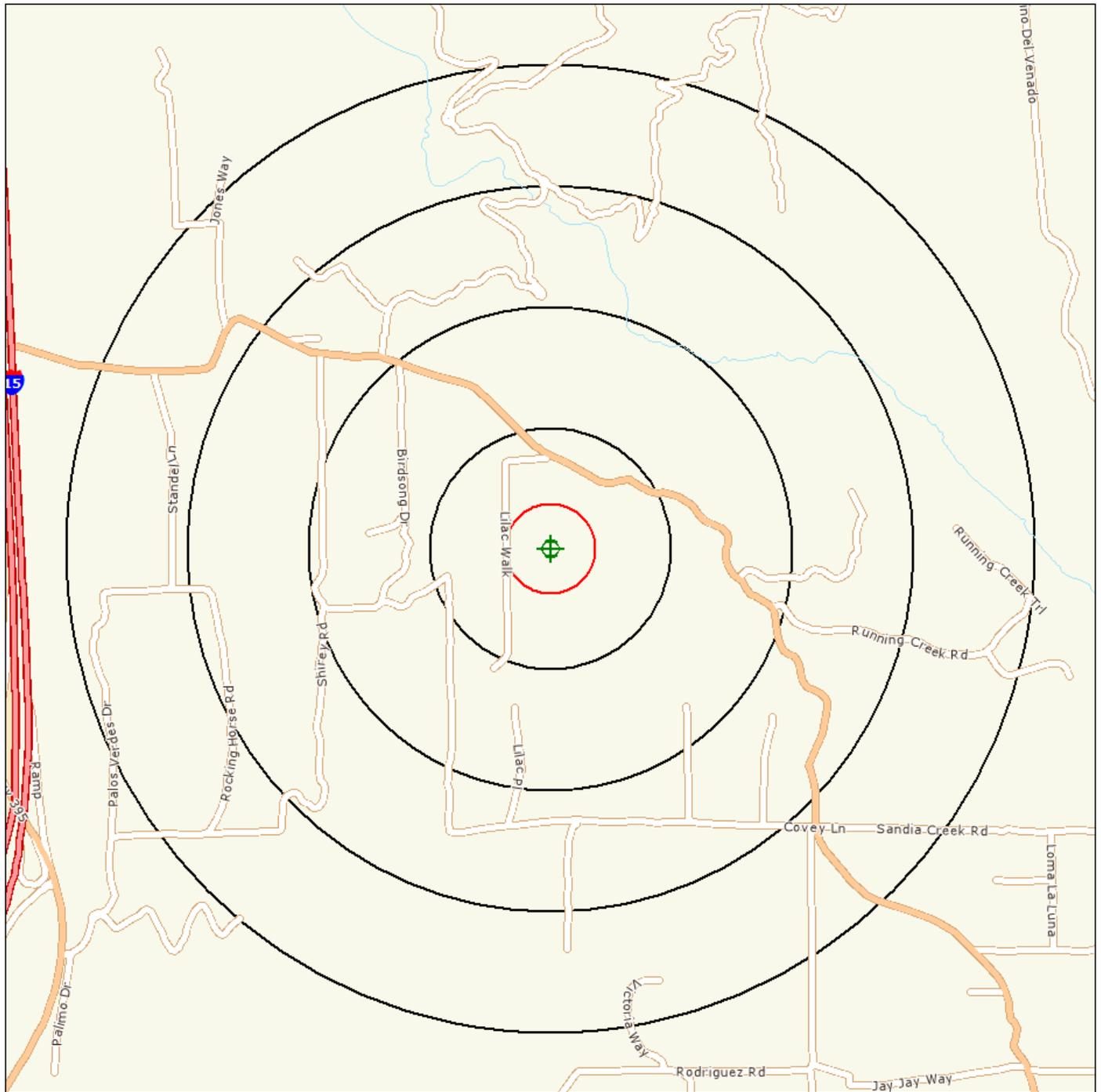
Environmental FirstSearch

1 Mile Radius

Single Map:

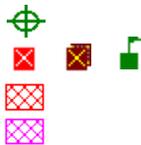


9383 WEST LILAC RD, ESCONDIDO CA 92026



Source: Tele Atlas

- Target Site (Latitude: 33.294081 Longitude: -117.130524)
- Identified Site, Multiple Sites, Receptor
- NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
- Triballand.....
- Black Rings Represent 1/4 Mile Radius; Red Ring Represents 500 ft. Radius





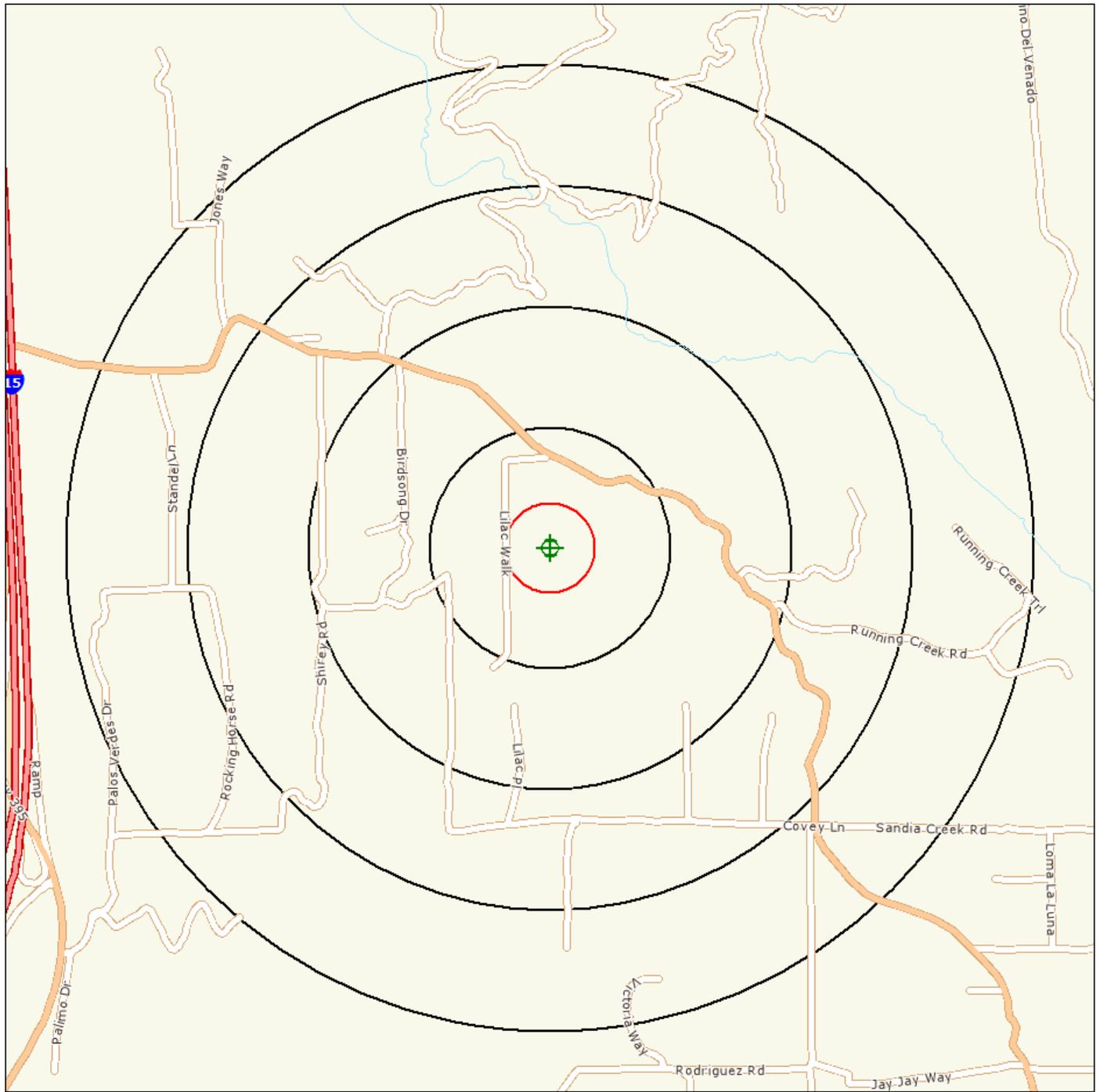
Environmental FirstSearch

1 Mile Radius

ASTM-05: NPL, RCRA COR, STATE

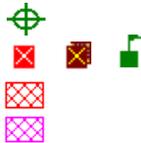


9383 WEST LILAC RD, ESCONDIDO CA 92026



Source: Tele Atlas

- Target Site (Latitude: 33.294081 Longitude: -117.130524)
- Identified Site, Multiple Sites, Receptor
- NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
- Triballand.....
- Black Rings Represent 1/4 Mile Radius; Red Ring Represents 500 ft. Radius





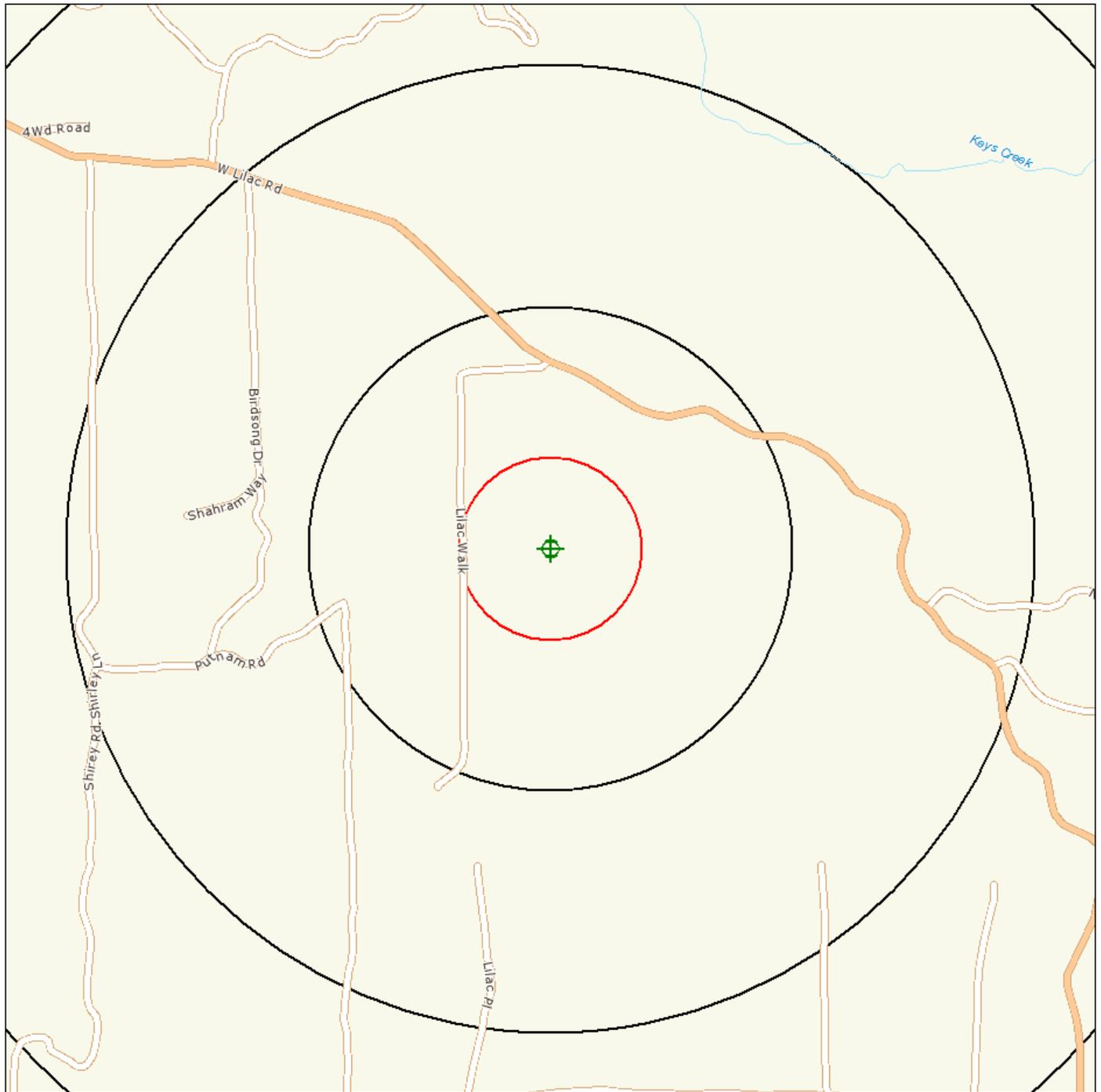
Environmental FirstSearch

.5 Mile Radius

ASTM-05: Multiple Databases



9383 WEST LILAC RD, ESCONDIDO CA 92026



Source: Tele Atlas

- Target Site (Latitude: 33.294081 Longitude: -117.130524)
- Identified Site, Multiple Sites, Receptor
- NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
- Triballand.....
- Black Rings Represent 1/4 Mile Radius; Red Ring Represents 500 ft. Radius





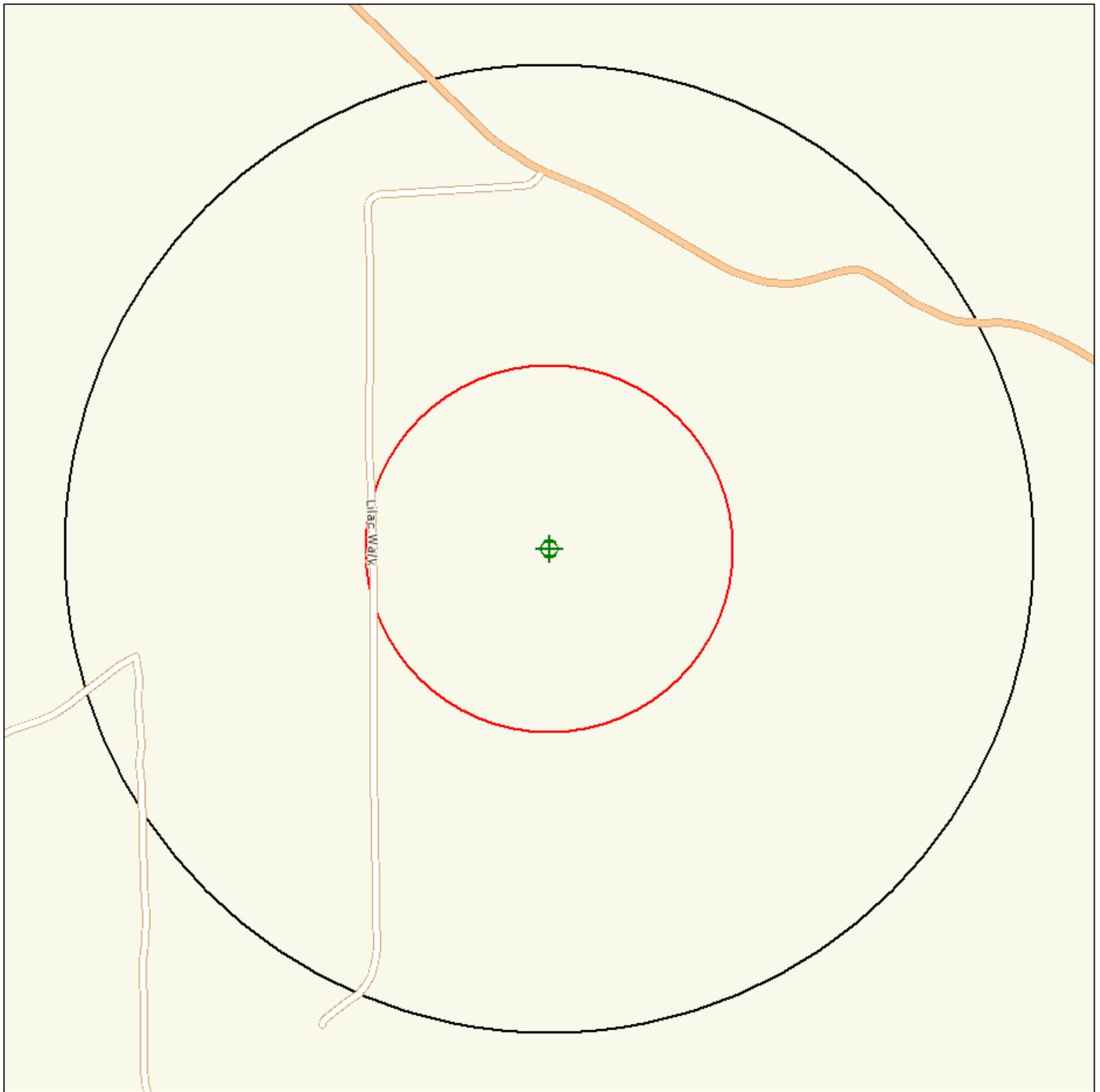
Environmental FirstSearch

.25 Mile Radius

ASTM-05: RCRAGEN, UST, OTHER, FEDIC/EC



9383 WEST LILAC RD, ESCONDIDO CA 92026



Source: Tele Atlas

- Target Site (Latitude: 33.294081 Longitude: -117.130524)
- Identified Site, Multiple Sites, Receptor
- NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
- Triballand.....
- Black Rings Represent 1/4 Mile Radius; Red Ring Represents 500 ft. Radius





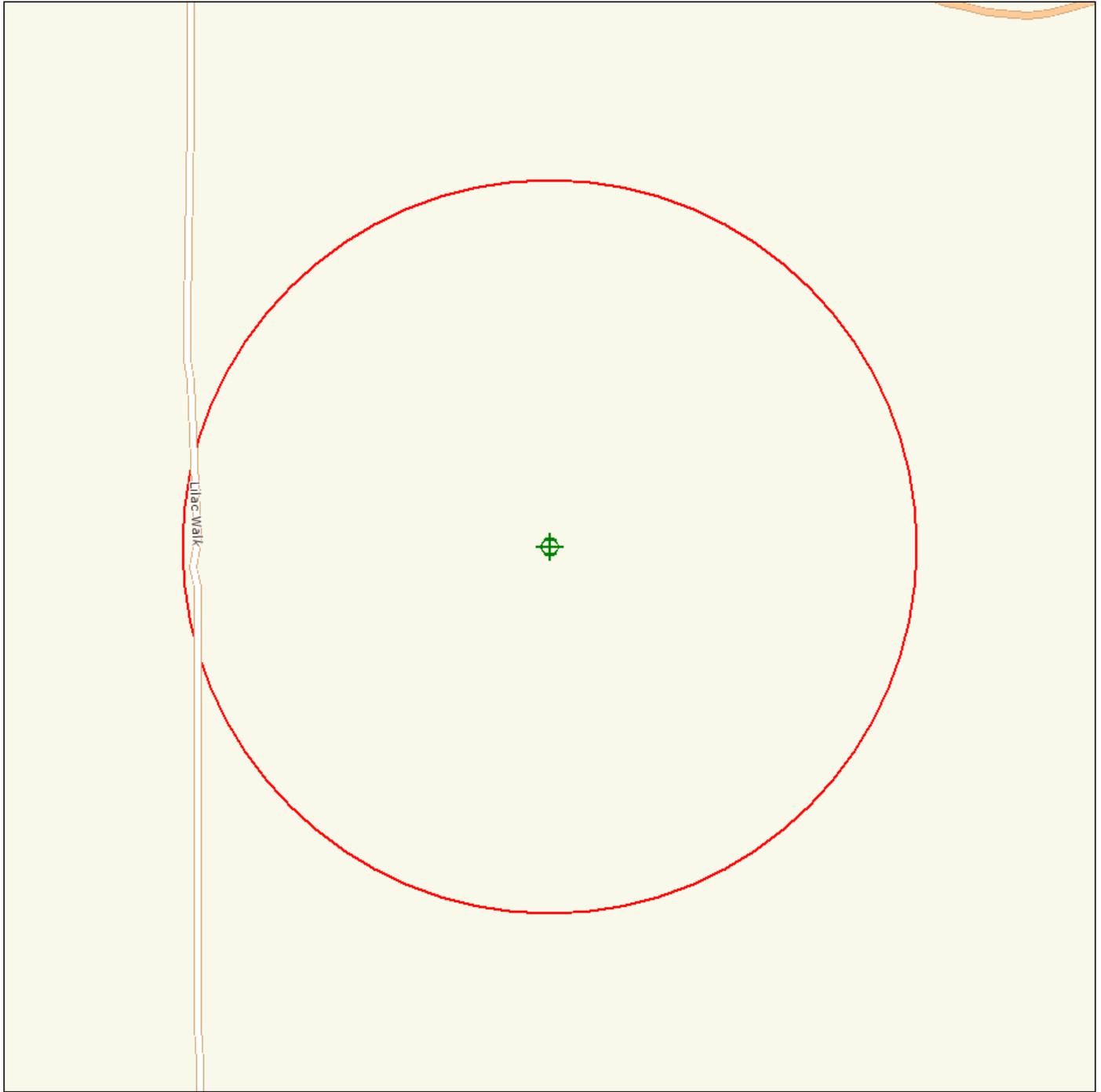
Environmental FirstSearch

.12 Mile Radius

ASTM-05: Multiple Databases

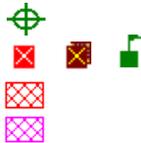


9383 WEST LILAC RD, ESCONDIDO CA 92026



Source: Tele Atlas

- Target Site (Latitude: 33.294081 Longitude: -117.130524)
 - Identified Site, Multiple Sites, Receptor
 - NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
 - Triballand.....
- Black Rings Represent 1/4 Mile Radius; Red Ring Represents 500 ft. Radius

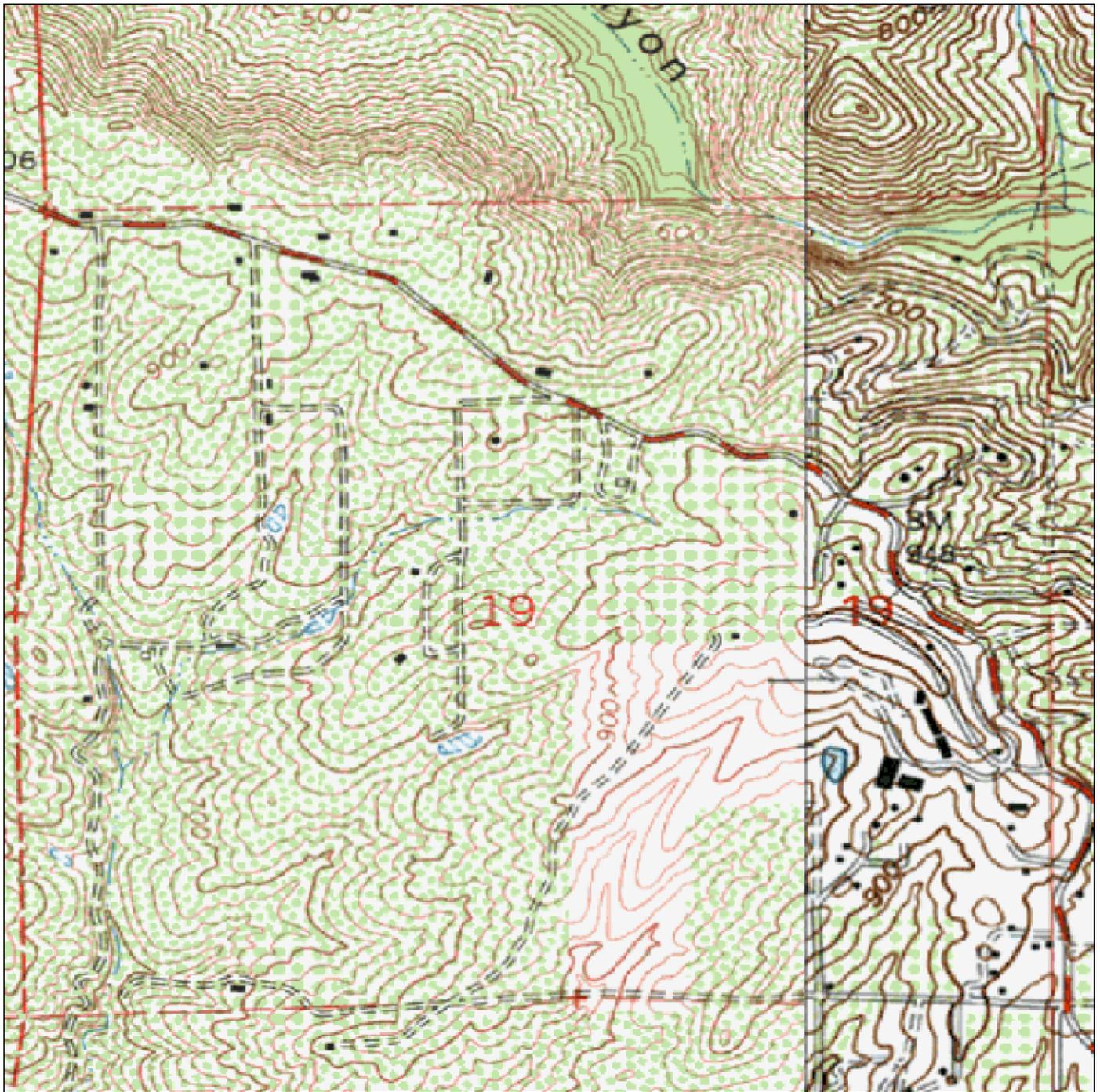




Site Location Map

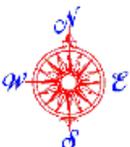
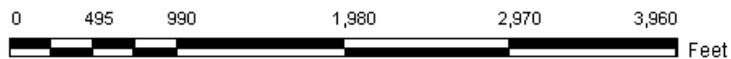
Topo : 0.75 Mile Radius

9383 WEST LILAC RD, ESCONDIDO CA 92026



SOURCE: SCANNED USGS TOPOGRAPHIC QUADRANGLES
SCANNED BY MAPTECH AND USGS
DISTRIBUTED AUGUST, 2005.

Black Rings Represent 1/4 Mile Radii; Red Ring Represents 500 ft. Radius



Data Supplied by:



Prepared by FirstSearch Technology Corporation

JOB NO.

Map Name: BONALL
Map Reference Code: 33117-C2-TF-024

Date Created: 1968--
Contour Interval: 20 feet

Date Revised: 1975--
Elevation:

FIGURE NO.

APPENDIX E
USER PROVIDED INFORMATION



OWNER/LANDLORD/OCCUPANT INTERVIEW QUESTIONS

Project Number / Name: ACR-71377 / "Carlson" Property

Project Address: APNs 128-440-06 – 9383 West Lilac Road, Valley Center, CA

1. What is/are the Current Use(s) of the Property, to the best of your knowledge?

growing a few palms, other plants, houses

2. What was/were the Past Use(s) of the Property, to the best of your knowledge?

Property was natural chaparral cut back when I brought it in 1986

3. Are there now or were there ever present any aboveground storage tanks, underground storage tanks or vent pipes, fill pipes or accessways indicating underground storage tanks?

above ground propane tank, there are water pipes underground

4. Are there any areas of the site with strong, pungent, or noxious odors?

No

5. Are there any areas of standing surface water, including Pools or sumps?

No

6. Are there any Hazardous Substances and/or Petroleum Product Containers currently stored on site?

gas cans to run weed eaters - Nothing else

7. Are there any unlabelled Drums or any Unidentified Substance Containers stored on the property?

No

8. Is there any Electrical or hydraulic equipment known to contain PCBs or likely to contain PCBs?

No

9. Do you know of any spills or other chemical releases that have taken place at the property?

No

10. Do you know of any environmental cleanups that have taken place at the property?

None since 1986

11. Are you aware of any deed restrictions or other activity or land use restrictions that have been placed on the property as a result of an environmental issue?

No - None -

12. Are you aware of any environmental liens, unresolved notices of violation, or litigation related to a contamination issue at the property?

No

13. Are you aware of any previous assessments conducted at the subject property?

I assume you are asking about environmental assessments - None to my knowledge

Preparer:

Name: Linda Carlson

Address: 9383 W. Lilac Rd. Escondido 92024

Signature: Linda Carlson

Date: Dec 5, 2011

Call me for other questions 760 230-1346

I have owned this property since 1986. Beside putting in electrical lines underground & water lines underground - Building 2 garages & putting in a manufactured home - the land has been left in a natural state. There is a large area of chaparral at the south end. The land was not farmed or anything before I purchased it -



**ASTM E1597-05
USER SPECIFIC QUESTIONNAIRE**

Project Number / Name: ACR-71377 / 5.0-acre "Carlson" Property (APN 128-440-06)

Project Address: 9383 West Lilac Road, Valley Center, CA 92026

Per the ASTM E1527 05 Standard, the *user* (i.e., the entity that orders the Phase I ESA) is required to provide the following information (if available). Your answers will be incorporated into the final Phase I ESA under the section "User-supplied Information." These questions have been incorporated into the new standard in order to ascertain the User's level of knowledge concerning any known environmental concerns or problems. Please complete these questions to the best of your knowledge and return to EEI as soon as possible.

(1.) Environmental cleanup liens that are filed or recorded against the site (40 CFR 312.25).

Are you aware of any environmental cleanup liens against the *property* that are filed or recorded under federal, tribal, state or local law? (A copy of a recent Title Search may assist in this determination).

NO

(2.) Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry (40 CFR 312.26).

Are you aware of any Activity and/or Land Use Limitations (AUL's), 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? (A copy of a recent Title Search may assist in this determination).

NO

(3.) Specialized knowledge or experience of the person seeking to qualify for the Landowner Liability Protections (LLP - 40 CFR 312.28).

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? (self-explanatory)

NO

(4.) Relationship of the purchase price to the fair market value of the *property* if it were not contaminated (40 CFR 312.29).

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*?

YES

(5.) Commonly known or reasonably ascertainable information about the *property* (40 CFR 312.30).
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*?

NO

(b.) Do you know of specific chemicals that are present or once were present at the *property*?

NO

(c.) Do you know of spills or other chemical releases that have taken place at the *property*?

NO

(d.) Do you know of any environmental cleanups that have taken place at the *property*?

NO

(6.) The degree of obviousness of the presence or likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).

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*?

NO

In addition, certain information should be collected, if available, and provided to the *environmental professional* selected to conduct the Phase I. This information is intended to assist the *environmental professional* but is not necessarily required to qualify for one of the *LLPs*. The information includes:

(a) the reason why the Phase I is required,
PURCHASE & SAN DIEGO COUNTY DPLU

(b) the type of *property* and type of *property* transaction, for example, sale, purchase, exchange, etc.,

SALE

(c) the complete and correct address for the *property* (a map or other documentation showing *property* location and boundaries is helpful),

(d) the scope of services desired for the Phase I (including whether any parties to the *property* transaction may have a required standard scope of services on whether any considerations beyond the requirements of Practice E 1527 are to be considered),

(e) identification of all parties who will rely on the Phase I *report*,

ACCRETIVE & AFFILIATES, & COUNTY OF SAN DIEGO

(f) identification of the site contact and how the contact can be reached,

(g) any special terms and conditions which must be agreed upon by the *environmental professional*, and

(h) any other knowledge or experience with the *property* that may be pertinent to the *environmental professional* (for example, copies of any available prior *environmental site assessment reports*, documents, correspondence, etc., concerning the *property* and its environmental condition).

Preparer:

Name/Company:

 Jon P. King

Address:

12275 El Camino Real - Suite 110

Date:

10-5-11

**APPENDIX F
PHOTOGRAPHIC LOG**



Photograph 1 – View of the subject property dwellings located on the east-central portion of the subject property. View is to the southwest.



Photograph 2 – View of the subject property looking southwest. Photograph was taken from the northeast corner of the property.



Photograph 3 – View of the southern portion of the subject property. View is to the south.



Photograph 4 – View of a pad-mounted transformer located along the east-central portion of the subject property.



Photograph 5 – View of an above ground propane tank located along the southeast portion of the property. View is to the northwest.



Photograph 6 – View of various household items located along the north-central portion of the subject property.

**APPENDIX G
LIMITED AGRICULTURAL CHEMICAL SAMPLING
LABORATORY REPORT AND CHAIN OF CUSTODY**



25712 Commercentre Drive
Lake Forest, California 92630
949.297.5020 Phone
949.297.5027 Fax

09 December 2011

Brian Brennan
EEI - Carlsbad
2195 Faraday Ave., Ste K
Carlsbad, CA 92008
RE: Carlson

Enclosed are the results of analyses for samples received by the laboratory on 12/02/11 13:32. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Daniel Chavez
Project Manager

EEI - Carlsbad
2195 Faraday Ave., Ste K
Carlsbad CA, 92008

Project: Carlson
Project Number: ACR-71377
Project Manager: Brian Brennan

Reported:
12/09/11 10:34

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
ACR-1	T111819-01	Soil	12/01/11 09:58	12/02/11 13:32
ACR-2	T111819-02	Soil	12/01/11 10:00	12/02/11 13:32
ACR-3	T111819-03	Soil	12/01/11 10:05	12/02/11 13:32
ACR-4	T111819-04	Soil	12/01/11 10:07	12/02/11 13:32
ACR-5	T111819-05	Soil	12/01/11 10:10	12/02/11 13:32
ACR-6	T111819-06	Soil	12/01/11 10:12	12/02/11 13:32

SunStar Laboratories, Inc.



The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



25712 Commercentre Drive
 Lake Forest, California 92630
 949.297.5020 Phone
 949.297.5027 Fax

EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Carlson Project Number: ACR-71377 Project Manager: Brian Brennan	Reported: 12/09/11 10:34
--	---	-----------------------------

ACR-1
T111819-01 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120507	12/05/11	12/07/11	EPA 6010B	
Lead	4.2	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120505	12/05/11	12/06/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	

Surrogate: Tetrachloro-meta-xylene 116 % 35-140 " " " "

SunStar Laboratories, Inc.

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Daniel Chavez, Project Manager



25712 Commercentre Drive
 Lake Forest, California 92630
 949.297.5020 Phone
 949.297.5027 Fax

EEl - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Carlson Project Number: ACR-71377 Project Manager: Brian Brennan	Reported: 12/09/11 10:34
--	---	------------------------------------

ACR-2
T111819-02 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120507	12/05/11	12/07/11	EPA 6010B	
Lead	4.6	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120505	12/05/11	12/06/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	

Surrogate: Tetrachloro-meta-xylene	115 %	35-140	"	"	"	"	"	"	
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SunStar Laboratories, Inc.

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Daniel Chavez, Project Manager



25712 Commercentre Drive
 Lake Forest, California 92630
 949.297.5020 Phone
 949.297.5027 Fax

EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Carlson Project Number: ACR-71377 Project Manager: Brian Brennan	Reported: 12/09/11 10:34
--	---	-----------------------------

ACR-3
T111819-03 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120507	12/05/11	12/07/11	EPA 6010B	
Lead	4.7	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120505	12/05/11	12/06/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	

Surrogate: Tetrachloro-meta-xylene	85.8 %	35-140	"	"	"	"	"	"	
------------------------------------	--------	--------	---	---	---	---	---	---	--

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--	---	-----------------------------

ACR-4
T111819-04 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120507	12/05/11	12/07/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120505	12/05/11	12/06/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	
Surrogate: Tetrachloro-meta-xylene		80.9 %		35-140	"	"	"	"	

SunStar Laboratories, Inc.

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Daniel Chavez, Project Manager



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EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Carlson Project Number: ACR-71377 Project Manager: Brian Brennan	Reported: 12/09/11 10:34
--	---	-----------------------------

ACR-5
T111819-05 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120507	12/05/11	12/07/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120505	12/05/11	12/06/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	
Surrogate: Tetrachloro-meta-xylene		117 %	35-140		"	"	"	"	

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Daniel Chavez, Project Manager



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--	---	-----------------------------

ACR-6
T111819-06 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1120507	12/05/11	12/07/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	"	"	

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1120505	12/05/11	12/06/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	ND	5.0	"	"	"	"	"	"	
Endosulfan I	ND	5.0	"	"	"	"	"	"	
4,4'-DDE	ND	5.0	"	"	"	"	"	"	
Dieldrin	ND	5.0	"	"	"	"	"	"	
Endrin	ND	5.0	"	"	"	"	"	"	
4,4'-DDD	ND	5.0	"	"	"	"	"	"	
Endosulfan II	ND	5.0	"	"	"	"	"	"	
4,4'-DDT	ND	5.0	"	"	"	"	"	"	
Endrin aldehyde	ND	5.0	"	"	"	"	"	"	
Endosulfan sulfate	ND	5.0	"	"	"	"	"	"	
Methoxychlor	ND	10	"	"	"	"	"	"	
Endrin ketone	ND	5.0	"	"	"	"	"	"	
Toxaphene	ND	200	"	"	"	"	"	"	
Surrogate: Tetrachloro-meta-xylene		122 %		35-140	"	"	"	"	

SunStar Laboratories, Inc.

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Daniel Chavez, Project Manager

EEl - Carlsbad

2195 Faraday Ave., Ste K
Carlsbad CA, 92008

Project: Carlson

Project Number: ACR-71377

Project Manager: Brian Brennan

Reported:

12/09/11 10:34

Metals by EPA 6010B - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1120507 - EPA 3050B

Blank (1120507-BLK1)

Prepared: 12/05/11 Analyzed: 12/07/11

Arsenic	ND	5.0	mg/kg							
Lead	ND	3.0	"							

LCS (1120507-BS1)

Prepared: 12/05/11 Analyzed: 12/07/11

Arsenic	103	5.0	mg/kg	100		103	75-125			
Lead	103	3.0	"	100		103	75-125			

Matrix Spike (1120507-MS1)

Source: T111819-01

Prepared: 12/05/11 Analyzed: 12/07/11

Arsenic	79.6	5.0	mg/kg	100	3.81	75.7	75-125			
Lead	79.4	3.0	"	100	4.16	75.3	75-125			

Matrix Spike Dup (1120507-MSD1)

Source: T111819-01

Prepared: 12/05/11 Analyzed: 12/07/11

Arsenic	91.9	5.0	mg/kg	100	3.81	88.1	75-125	14.4	20	
Lead	91.0	3.0	"	100	4.16	86.8	75-125	13.5	20	

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Daniel Chavez, Project Manager



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EEI - Carlsbad
 2195 Faraday Ave., Ste K
 Carlsbad CA, 92008

Project: Carlson
 Project Number: ACR-71377
 Project Manager: Brian Brennan

Reported:
 12/09/11 10:34

Organochlorine Pesticides by EPA Method 8081A - Quality Control
SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch 1120505 - EPA 3550 ECD/GCMS

Blank (1120505-BLK1)

Prepared: 12/05/11 Analyzed: 12/06/11

alpha-BHC	ND	5.0	ug/kg							
gamma-BHC (Lindane)	ND	5.0	"							
beta-BHC	ND	5.0	"							
delta-BHC	ND	5.0	"							
Heptachlor	ND	5.0	"							
Aldrin	ND	5.0	"							
Heptachlor epoxide	ND	5.0	"							
gamma-Chlordane	ND	5.0	"							
alpha-Chlordane	ND	5.0	"							
Endosulfan I	ND	5.0	"							
4,4'-DDE	ND	5.0	"							
Dieldrin	ND	5.0	"							
Endrin	ND	5.0	"							
4,4'-DDD	ND	5.0	"							
Endosulfan II	ND	5.0	"							
4,4'-DDT	ND	5.0	"							
Endrin aldehyde	ND	5.0	"							
Endosulfan sulfate	ND	5.0	"							
Methoxychlor	ND	10	"							
Endrin ketone	ND	5.0	"							
Toxaphene	ND	200	"							

Surrogate: Tetrachloro-meta-xylene 99.4 " 100 99.4 35-140

LCS (1120505-BS1)

Prepared: 12/05/11 Analyzed: 12/06/11

gamma-BHC (Lindane)	182	5.0	ug/kg	200		91.1	40-120
Heptachlor	192	5.0	"	200		95.8	40-120
Aldrin	204	5.0	"	200		102	40-120
Dieldrin	202	5.0	"	200		101	40-120
Endrin	205	5.0	"	200		103	40-120
4,4'-DDT	154	5.0	"	200		77.2	33-147

Surrogate: Tetrachloro-meta-xylene 101 " 100 101 35-140

SunStar Laboratories, Inc.

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EEI - Carlsbad 2195 Faraday Ave., Ste K Carlsbad CA, 92008	Project: Carlson Project Number: ACR-71377 Project Manager: Brian Brennan	Reported: 12/09/11 10:34
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Organochlorine Pesticides by EPA Method 8081A - Quality Control
SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch 1120505 - EPA 3550 ECD/GCMS

Matrix Spike (1120505-MS1)	Source: T111819-01			Prepared: 12/05/11	Analyzed: 12/06/11					
gamma-BHC (Lindane)	175	5.0	ug/kg	200	ND	87.5	30-120			
Heptachlor	199	5.0	"	200	ND	99.4	30-120			
Aldrin	191	5.0	"	200	ND	95.6	30-120			
Dieldrin	215	5.0	"	200	ND	108	30-120			
Endrin	212	5.0	"	200	ND	106	30-120			
4,4'-DDT	145	5.0	"	200	ND	72.5	30-120			
<i>Surrogate: Tetrachloro-meta-xylene</i>	<i>113</i>		<i>"</i>	<i>100</i>		<i>113</i>	<i>35-140</i>			

Matrix Spike Dup (1120505-MSD1)	Source: T111819-01			Prepared: 12/05/11	Analyzed: 12/06/11					
gamma-BHC (Lindane)	180	5.0	ug/kg	200	ND	90.1	30-120	2.84	30	
Heptachlor	203	5.0	"	200	ND	101	30-120	1.91	30	
Aldrin	202	5.0	"	200	ND	101	30-120	5.71	30	
Dieldrin	213	5.0	"	200	ND	107	30-120	0.941	30	
Endrin	210	5.0	"	200	ND	105	30-120	0.982	30	
4,4'-DDT	152	5.0	"	200	ND	76.2	30-120	4.97	30	
<i>Surrogate: Tetrachloro-meta-xylene</i>	<i>118</i>		<i>"</i>	<i>100</i>		<i>118</i>	<i>35-140</i>			

SunStar Laboratories, Inc.

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Daniel Chavez, Project Manager

EEI - Carlsbad

2195 Faraday Ave., Ste K
Carlsbad CA, 92008

Project: Carlson

Project Number: ACR-71377

Project Manager: Brian Brennan

Reported:

12/09/11 10:34

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference

SunStar Laboratories, Inc.



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Daniel Chavez, Project Manager



CHAIN OF CUSTODY
 Environmental Equalizers, Inc. (dba "EEL")
 2195 Faraday Avenue, Suite K, Carlsbad, California 92008
 Phone: 760-431-3747 Fax: 760-431-3748 www.eeliger.com

BART # T111819

DATE: 12-1-11 LABORATORY: *Swedler* PAGE: 1-1

PROJECT NAME: Carlson EEL PROJECT NUMBER: *ACE-71377*

PROJECT LOCATION: 9383 West Lila Road COLLECTOR: *BBB*

EEL PROJECT MANAGER: *Brian Brown* TURN AROUND TIME: *Normal*

Electronic Data Format (EDF): Yes No

Global ID:

EMAIL RESULTS TO: *brennan@ecitiger.com*

SPECIAL INSTRUCTIONS/NOTES: 2.2°

SAMPLE ID	DATE SAMPLED	TIME	SAMPLE TYPE	CONTAINER TYPE	EPA 8260B - VOCs	EPA 8260B - VOCs + TPH-g	EPA 8260B - TPH-g, BTEX, MTBE - ONLY	EPA 8015 M - TPH-g	EPA 8015 M - TPH-d	EPA 8015 M - TPH-ext (CCID)	EPA 6010B/7000 - Title 22 Metals	EPA 6010B - Total Arsenic - ONLY	EPA 6010B - Total Lead - ONLY	EPA 8081A - Organochlorine Pesticides	TO-15 - VOCs	TO-3 - TPH-g	NUMBER OF CONTAINERS
01 ACE-1	12-1-11	958	Soil	Glass Jar								X	X	X			1
02 ACE-2		1000										X	X	X			1
03 ACE-3		1005										X	X	X			1
04 ACE-4		1007										X	X	X			1
05 ACE-5		1010										X	X	X			1
06 ACE-6		1012										X	X	X			1

Relinquished By (signature): *[Signature]* Date/Time: 12/2/11 1332

Relinquished By (signature): *[Signature]* Date/Time: 12/2/11 1332

Received By (signature): *[Signature]* Date/Time: 12/2/11 1332

SAMPLE RECEIVING REVIEW SHEET

BATCH # T111819

Client Name: EEI - CARLSBAD

Project: CARLSON

Received by: DAN

Date/Time Received: 12-2-11 / 13:32

Delivered by : Client SunStar Courier GSO FedEx Other _____

Total number of coolers received 0 Temp criteria = 6°C > 0°C (no frozen containers)

Temperature: cooler #1 _____ °C +/- the CF (- 0.2°C) = 2.2 °C corrected temperature

cooler #2 _____ °C +/- the CF (- 0.2°C) = _____ °C corrected temperature

cooler #3 _____ °C +/- the CF (- 0.2°C) = _____ °C corrected temperature

Samples outside temp. but received on ice, w/in 6 hours of final sampling. Yes No* N/A

Custody Seals Intact on Cooler/Sample Yes No* N/A

Sample Containers Intact Yes No*

Sample labels match COC ID's Yes No*

Total number of containers received match COC Yes No*

Proper containers received for analyses requested on COC Yes No*

Proper preservative indicated on COC/containers for analyses requested Yes No* N/A

Complete shipment received in good condition with correct temperatures, containers, labels, volumes preservatives and within method specified holding times. Yes No*

* Complete Non-Conformance Receiving Sheet if checked

Cooler/Sample Review - Initials and date SL 12-2-11

Comments:



EEI

Geotechnical & Environmental Solutions

**PHASE I ENVIRONMENTAL
SITE ASSESSMENT
and
LIMITED AGRICULTURAL
CHEMICAL SURVEY**

**Accretive Investments, Inc.
21.34-Acre "Jones" Property
APNs 128-290-09 and 128-290-10
9431 West Lilac Road
Escondido, California 92026**

**County Project Number: SP 3800 12-001; Lilac Hills Ranch
Environmental Log Number: 3910 12-02-003**

**January 18, 2012
(March 26, 2012 revisions)**

EEI Project Number ACR-71398

**PHASE I ENVIRONMENTAL SITE ASSESSMENT AND
LIMITED AGRICULTURAL CHEMICAL SURVEY**

Prepared for:

Mr. Jon Rilling
Vice President
Accretive Investments, Inc.
12275 El Camino Real, Suite 110
San Diego, California 92130

Subject property location:

21.34-Acre "Jones" Property
APN 128-290-09 and 128-290-10
9431 West Lilac Road
Escondido, California 92026
EEI Project Number ACR-71398

Prepared and Edited by:



Brian R. Brennan, REA-II 07920
Senior Project Manager

Reviewed by:



Bernard A. Sentianin, PG 5530, REA I 3477
Principal Geologist

EEI
2195 Faraday Avenue, Suite K
Carlsbad, California 92008
(760) 431-3747

EEI Project No. ACR-71398

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GENERAL SUBJECT PROPERTY INFORMATION

Project Information: 21.34-Acre "Jones" Property

EEI Project Number: ACR-71398

Subject Property Information:

21.34-Acre "Jones" Property
APN 128-290-09 and 128-290-10
9431 West Lilac Road
Escondido, California 92026

Subject Property Access Contact: Mr. Jon Rilling, Accretive Investments, Inc. (858) 345-3644 and Ms. Geraldine Jones, Property Owner

Consultant Information:

EEI
2195 Faraday Avenue, Suite K
Carlsbad, California 92008
Phone: (760) 431-3747
Fax: (760) 431-3748
E-mail Address of Environmental Professional: bbrennan@eetiger.com

Inspection Date: December 6, 2011 / **Report Date:** January 18, 2012 (March 26, 2012 revisions)

Client Information:

Mr. Jon Rilling
Vice President
Accretive Investments, Inc.
12275 El Camino Real, Suite 110
San Diego, California 92130

Site Assessor:

Brian R. Brennan, REA-II 07920 – Senior Project Manager

EP Certification:

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR 312.10 (**Resume, Appendix A**).



Brian R. Brennan, REA-II 07920 – Senior Project Manager

AAI Certification:

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Brian R. Brennan, REA-II 07920 – Senior Project Manager

EXECUTIVE SUMMARY

At the request and authorization of Accretive Investments, Inc. (“Client”), EEI conducted a Phase I Environmental Site Assessment (ESA) for the property located at 9431 West Lilac Road, Escondido, California. The purpose of this Phase I ESA was to assess the presence or likely presence of an existing, historical, or threatened release of any hazardous substances or petroleum products into structures, soil, and/or groundwater beneath the subject property, to the extent practical (i.e., *recognized environmental conditions* as delineated in ASTM E1527-05).

The subject property is located along a private drive southwest of West Lilac Road, Escondido, California. The subject property encompasses a total of 21.34-acres on two (2) contiguous parcels identified as Assessor’s Parcel Numbers (APNs) 128-290-09 and 128-290-10. The subject property is identified by the address: 9431 West Lilac Road.

Access to the subject property can be obtained from an asphalt driveway located along the northeast corner of the property. The driveway bisects the subject property from the northeast corner to the west-central portion of the property. The subject property is gated, delineated by metal fencing on all sides, and used for agricultural purposes. The subject property is bound by a combination of rural residences, agricultural, and undeveloped land in all directions.

A review of the County of San Diego Land Use and Environmental Group (LUEG, 2012) website data indicated that the subject property is currently zoned as A70 – Limited Agriculture. Intended property use includes: limited crop or animal agricultural (A70).

Based on historical records such as aerial photographs, topographic maps, and County records, the subject property has been developed with a residential structure and utilized for agricultural-related land use since 1975.

EEI contacted the County of San Diego, California Department of Toxic Substances Control (DTSC), State Water Resources Control Board (SWRCB), and reviewed other State and Federal databases to determine if the subject property, or any adjacent properties, were listed as hazardous waste generators, underground storage tank releases (UST), or as having other environmental concerns (i.e., spill, leak, or aboveground tank). No releases/leaks or spills were documented at the subject property on any of the databases researched.

On December 6, 2011, EEI personnel conducted a reconnaissance of the subject property to physically observe the property and adjoining properties for conditions indicating a potential recognized environmental concern. Concerns would include any evidence of contamination, distressed vegetation, petroleum-hydrocarbon staining, waste drums, illegal dumping, or improper waste storage and/or handling. No evidence of *recognized environmental conditions* was noted on the subject property during our subject property reconnaissance efforts, except for an aboveground storage tank (AST), three (3) metal storage drums, and hazardous materials/substances materials stored within a maintenance building.

Based on the historical agricultural use of the property, EEI performed a limited agricultural chemical survey to evaluate soil beneath the subject property. Sampling activities were conducted on December 6, 2011. A total of 24 discrete soil samples (ACR-1 through ACR-24), were collected at 6-inches below ground surface and analyzed for Arsenic and Lead by EPA Test Method 6010B. Additionally, six (6) composite samples (Composite #1 through Composite #6) (prepared by a California-State certified laboratory), were analyzed for Organochlorine Pesticides by EPA Method 8081A.

Based on laboratory analytical results, no concentrations of arsenic were detected above the laboratory reporting limit (i.e., “non-detect”). Concentrations of lead and organochlorine pesticides (gamma-Chlordane and alpha-Chlordane) were detected in the soil samples collected during this investigation; however, the levels were less than applicable residential screening values. Therefore, further investigation does not appear to be warranted at this time.

We have performed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Designation E1527-05 for the subject property located at 9431 West Lilac Road, Escondido, California. Any exceptions to, or deletions from, this practice are described in Section 7.0 of this report. Phase I ESA has revealed no evidence of recognized environmental conditions in connection with the property, except for the following:

- An aboveground storage tank (AST), approximately 250 to 500 gallons in capacity, of unknown contents is located within a concrete secondary containment area on the subject property. EEI recommends that any residual fuel within the AST be removed and the tank disposed of according to local and state guidelines, prior to any future site activities. Furthermore, confirmation soil sampling should be conducted beneath the AST to evaluate soils for potential hydrocarbon contamination.

Additionally, one 55-gallon diesel fuel storage drum, one 55-gallon oil drum and one 25-gallon storage drum (contents unknown), are located on the subject property. EEI recommends that these drums be removed, and properly disposed of offsite.

- All known or suspected hazardous materials/substances stored onsite should be inventoried and properly disposed of off-site prior to any future site improvements.

In addition to the above bulleted items, EEI has the following comments:

- There is a potential for Asbestos-Containing Material (ACM) and Lead-Based Paint (LBP) to be present in structures built prior to 1978. Prior to any future property improvements or demolition activities, ACM and LBP testing of on-site structures will likely be required.
- Based on the subject property’s historical agricultural use, it is possible that buried/concealed/hidden agricultural by-products, both below and above ground may have existed or exists on the subject property. Any buried trash/debris, or other waste encountered during future subject property development should be evaluated by an experienced environmental consultant prior to removal. If stained or suspicious soil is encountered during future grading operations, the material should be evaluated and if deemed necessary, characterized for proper disposal.

1.0 INTRODUCTION

1.1 Purpose

The purpose of this Phase I Environmental Site Assessment (ESA) was to assess the possible presence of *recognized environmental conditions* at the property located at 9431 West Lilac Road, Escondido, California (**Figure 1**). *Recognized environmental conditions* include those property uses that may indicate the presence or likely presence of an existing, historical, or threatened release of any hazardous substances or petroleum products into structures, soil, and/or groundwater beneath the property. The term *recognized environmental conditions* are not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that would not be subject to enforcement actions by a regulatory agency.

This ESA was performed in general conformance with the American Society for Testing and Materials (ASTM) *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, Designation E1527-05.

1.2 Scope of Services

The following scope of services was conducted by EEI:

- A review of readily available documents which included topographic, geologic, and hydrogeologic conditions associated with the subject property.
- A review of readily available maps, aerial photographs, and other documents relative to historical subject property usage and development.
- A review of previous environmental reports and regulatory file information pertaining to both existing and historic property conditions.
- A review of readily available federal, state, county, and city documents and database files concerning hazardous material storage, generation and disposal, active and inactive landfills, existing environmental concerns, and associated permits related to the subject property and/or immediately adjacent sites.
- A subject property reconnaissance to ascertain current conditions on the subject property.
- Interviews with person(s) knowledgeable of the subject property.
- A limited agricultural chemical survey, which consisted of collecting and analyzing soil samples from the subject property.
- March 26, 2012 revisions include: changes to aerial photography description and base aerial photograph for report figures.
- The preparation of this report which presents our findings, conclusions, and recommendations.

1.3 Reliance

This ESA has been prepared for the sole use of Accretive Investments, Inc. (Client). This assessment should not be relied upon by other parties without the express written consent of EEI and Client. Any use or reliance upon this assessment by a party other than the Client, therefore, shall be solely at the risk of such third party and without legal recourse against EEI, its employees, officers, or directors, regardless of whether the action in which recovery of damages is brought or based upon contract, tort, statute or otherwise.

This assessment should not be interpreted as a statistical evaluation of the subject property, but rather is intended to provide a preliminary indication of on-site impacts from previous property usage and/or the release of hazardous materials. If no significant indicators of the presence of hazardous materials and/or petroleum contamination are encountered during this search, this does not preclude their presence. The findings in this report are based upon published geologic and hydrogeologic information, information (both documentary and oral) provided by the County of San Diego, FirstSearch® (i.e., agency database search), various state and federal agencies, and EEI’s field observations. Some of these data are subject to change over time. Some of these data are based on information not currently observable or measurable, but recorded by documents or orally reported by individuals.

2.0 PHYSIOGRAPHIC SETTING

2.1 Subject Property Description

The subject property is located along a private drive southwest of West Lilac Road, Escondido, California (**Figure 2**). The subject property encompasses a total of 21.34-acres on two (2) contiguous parcels identified as Assessor’s Parcel Numbers (APNs) 128-290-09 and 128-290-10 (**Appendix B**). The subject property is identified by the address: 9431 West Lilac Road.

Access to the subject property can be obtained from an asphalt driveway located along the northeast corner of the property. The driveway bisects the property from the northeast corner to the west-central portion of the property. The subject property is gated, delineated by metal fencing on all sides, and used for agricultural purposes. The subject property is bound by a combination of rural residences, agricultural, and undeveloped land in all directions.

A review of the County of San Diego Land Use and Environmental Group (LUEG, 2012) website data indicated that the subject property is currently zoned as A70 – Limited Agriculture.

Based on historical records such as aerial photographs, topographic maps, and County records, the subject property has been developed with a residence and utilized for agricultural-related land use since 1975.

2.2 Topography

The subject property is located on the United States Geological Survey (USGS), Bonsall, 7.5-Minute Quadrangle (USGS, 1968, date revised 1975). Overall, the subject property is located on gently sloping terrain consisting of varying topographic relief from north to south. The subject property elevation ranges from approximately 800 feet above mean sea level (amsl) (southern portion) to approximately 910 feet amsl (northern portion). Based on topographic relief, surface water drainage appears to be predominately to the southwest.

2.3 Regional and Local Geology

The subject property and vicinity lies within the Peninsular Ranges Geomorphic Province of California (CGS, 2002). The Peninsular Ranges Geomorphic Province extends from the Transverse Ranges Geomorphic Province and the Los Angeles Basin, south to Baja California. This province varies in width from about 30- to 100-miles. It is bounded on the west by the Pacific Ocean, on the south by the Gulf of California and on the east by the Colorado Desert Province. The Peninsular Ranges are essentially a series of northwest-southeast oriented fault blocks. The Transverse Ranges Geomorphic Province bounds the Peninsular Ranges on the north.

Major fault zones and subordinate fault zones found in the Peninsular Ranges Province typically trend in a northwest-southeast direction. The closest major faults to the subject property are the Julian segment of the Elsinore Fault zone; the Rose Canyon Fault zone; and the Coronado Bank Fault zone (including the San Diego Trough Fault). Other major faults in the region include the San Jacinto Fault zone and the San Andreas Fault zone. The San Andreas Fault zone is considered the most active fault zone and borders the northeasterly margin of the province.

Geologic maps indicate the general vicinity of the subject property is underlain by Mesozoic aged (Cretaceous-age) granitic rocks (USGS, 2000). Specifically, the property is underlain by Tonalite of Couser Canyon, described as a Hornblende-biotite tonalite; coarse grained and massive. This Tonalite contain some granodiorite and is characterized by an abundance of pegmatite dikes.

Soils beneath the subject property and vicinity have been identified by the United States Department of Agriculture – Natural Resources Conservation Service, Web Soil Survey as a mix of the Cieneba course sandy loam series (CIE2) and Fallbrook sandy loam series (FaC2 and FaE2) (USDA, 2012). Soils in this series are reportedly deep, well drained soils that formed in material weathered from granitic rocks and are situated on slopes ranging from 15 to 30 percent.

2.4 Regional and Local Hydrogeology

According to the San Diego Regional Water Quality Control Board (SDRWQCB, 1994), the subject property is located within the groundwater designation of the Bonsall Subarea (HSA – 903.12), which is a part of the lower San Luis Hydrologic Area (HA – 903.10) and located within the San Luis Rey Hydrologic Unit (HU – 903.00). Groundwater beneath the San Luis HA has been identified as having existing beneficial uses for municipal, agricultural, and industrial supply processes.

According to the property owner, Ms. Geraldine Jones, there are no water supply wells located on the subject property. EEI reviewed the California Department of Water Resources, Water Data Library website (WDL, 2012) for additional information pertaining to groundwater and water supply wells on or in close proximity to the subject property. According to the website, no water supply wells are located on the subject property. Two wells “10S02W19D002S” and “10S02W19E001S,” both located approximately 0.35 miles northwest of the subject property, were reportedly last measured in 1967 with depths to groundwater of approximately 40 feet and 14 feet below grade, respectively.

2.5 Hydrologic Flood Plain Information

EEI reviewed the Federal Emergency Management Agency (FEMA, 2012) Flood Insurance Rate Map (FIRM) online database to determine if the subject property was in a flood zone. According to FEMA, no FIRM coverage for the subject property was available. EEI reviewed the San Diego Geographic Information Source website (SanGIS, 2012) for flood plain information. According to the website, the subject property is located within flood Zone X. FEMA defines Zone X as an area of minimal flood hazard, usually depicted on FIRMs as above the 500-year flood level.

3.0 SUBJECT PROPERTY BACKGROUND

3.1 Subject Property Ownership

According to the County of San Diego Assessor the current owner of the subject property (APN 128-290-09 and 128-290-10) is identified as Frank and Geraldine Jones with the following mailing address: 9431 West Lilac Road, Escondido, California 92026.

3.2 Subject Property History

EEI reviewed readily available information sources to evaluate historic land use in and around the subject property. These information sources include information from aerial photographs, USGS maps and the County of San Diego. The information sources reviewed is summarized in the following sections.

3.2.1 Aerial Photograph and Historical Map Review

Aerial photographs and historical topographical maps were reviewed to identify historical land development and any surface conditions which may have impacted the subject property. Photographs and historical topographic maps dating 1942, 1946, 1948, 1953, 1963, 1968, 1975, 1980, 1990/91, and 2002 were obtained and reviewed from Track Info Services/FirstSearch®, an environmental information/database retrieval service. A 2012 aerial photograph was provided by Accretive Investments, Inc. and reviewed, a copy of which is included herein (**Figure 2**).

Table 1 summarizes the results of the historical use review. Copies of the aerial photographs and historical topographic maps provided by Track Info Services/FirstSearch® are included in Appendix C. According to the information reviewed, the subject property has been developed with a residential structure and utilized for agricultural-related land use since 1975.

TABLE 1 Summary of Historical Use Review		
Year	Source and Scale	Comments
1942	Topographic Map 1:62,500	No developed structures were noted on the subject property. West Lilac Road was present to the north. The surrounding area appeared to be undeveloped land.
1946	Aerial Photograph 1:375	Subject property appeared to be undeveloped and covered with native vegetation. A dirt road, oriented northeast to southwest, was visible to the west of the subject property. West Lilac Road, unimproved at the time, was visible to the north. The surrounding area appeared to be undeveloped and/or cleared for agricultural-related land use.
1948	Topographic Map 1:24,000	No developed structures were noted on the subject property. An unimproved road was present to the south in the site vicinity. The surrounding area was sparsely developed.
1953	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1946 photograph.
1963	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1946 photograph. Additional cleared agriculture land in the site vicinity.

TABLE 1 Summary of Historical Use Review		
Year	Source and Scale	Comments
1968	Topographic Map 1: 24,000	Subject property remained undeveloped. Unimproved roads (Lilac Walk and Lilac Place) delineated the western property boundary. West Lilac Road was visible to the north. The subject property and surrounding area were shaded green, which signified agricultural-related land use.
1975	Aerial Photograph 1:375	Subject property appeared with a building located on the west-central portion of the property, and an access road from the north. Smaller outbuildings/features appeared to the north of the main building. The northern portion also appeared cleared for agriculture and orchards. The southern portion remained undeveloped. Orchards also appeared on the adjacent property to the east.
1975	Topographic Map 1:24,000	No apparent changes were noted to the subject property since the 1968 topographic map.
1980	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1974 aerial photograph; with the exception of the orchards being more apparent. Adjacent orchards appeared in the adjacent and surrounding area.
1990/91	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1980 aerial photograph, except that the orchards appeared more mature.
2002	Aerial Photograph 1:375	No apparent changes were noted to the subject property or adjacent property since the 1990/91 aerial photograph.
March 2012	Aerial Photograph <u>Accretive Investments, Inc.</u>	The subject property appeared as its current configuration, which consisted of a structure on the central portion of the property and smaller outbuildings/features north of the structure. The northern portion of the property and an area south of the structure consisted of thick orchards and large overgrown trees, while the balance of the site was undeveloped land. West Lilac Road was visible to the north. The surrounding area appeared to be a mix of residential and agricultural-related land use.

3.2.2 City/County Directory

Directory listings associated with the subject property (9431 West Lilac Road) was obtained from Track Info Services/FirstSearch®, an environmental information/database retrieval service. The subject property address was not listed from 1974 to 2011. A summary of the listings associated with the subject property address is summarized below in **Table 2**. Information for the target address (in bold) as well as the next lowest address on the same side of the street (left column) and next highest address on the same side of the street (right column). A copy of the City Directory Report is provided in **Appendix C**.

No addresses of potential concern, including gas stations, cleaners, automotive shops, and other address occupants of potential environmental concern were located on the subject street, or within the vicinity of the target address.

TABLE 2		
Summary of City/County Directory Search		
9431 West Lilac Walk, Escondido, California 92026		
North Adjacent Addresses	Subject Property	South Adjacent Addresses
2011		
9425 W. Lilac Rd Martino, Gary	9431 W. Lilac Road Address not listed	9437 W. Lilac Rd Wollman, Mark
2007		
9425 W. Lilac Rd No response	9431 W. Lilac Road Address not listed	9437 W. Lilac Rd Wollman, Mark
2002		
9425 W. Lilac Rd Martino, Gary	9431 W. Lilac Road Address not listed	9437 W. Lilac Rd Wollman, Mark
1997		
9425 W. Lilac Rd Dillon, James	9431 W. Lilac Road Address not listed	9437 W. Lilac Rd Engle David and Suzanne
1992		
9425 W. Lilac Rd Arleo M; Young Butch	9431 W. Lilac Road Address not listed	9437 W. Lilac Rd No listing
1986		
9425 W. Lilac Rd No listing	9431 W. Lilac Road Address not listed	9437 W. Lilac Rd No listing
1981		
9425 W. Lilac Rd Gilmore, Harold N.	9431 W. Lilac Road Address not listed	9437 W. Lilac Rd No listing
1974		
W. Lilac Rd First listing this street 9867	9431 W. Lilac Rd Address not listed	9867 W. Lilac Rd Walker Noel
<i>End of search due to A) earlier directory or street listing not found; or B) listing out of range, listings re-numbered, or no numeric listings</i>		

3.2.3 Sanborn Fire Insurance Maps

Sanborn Fire Insurance maps were developed in the late 1800s and early 1900s for use as an assessment tool for fire insurance rates in urbanized areas. An on-line search was made at the Los Angeles County Public Library’s collection of Sanborn Fire Insurance maps (LAPL, 2012). Sanborn map coverage was not available for the subject property and/or surrounding area; therefore, indicating little or no development prior to the 1950s.

3.2.4 County of San Diego Land Use and Environmental Group

EEI researched the County of San Diego Land Use and Environmental Group (LUEG, 2012) website to review any existing records related to development of the subject property. According to the online database maintained by the County (LUEG, 2012), no records were on file for the subject property (APNs 128-290-09 and 128-290-10).

3.3 Regulatory Database Search

EEI reviewed known electronic database listings for possible hazardous waste generating establishments in the vicinity of the subject property, as well as adjacent sites with known environmental concerns. Facilities were identified by county, state, or federal agencies that generate, store, or dispose of hazardous materials. The majority of information in this section was obtained from FirstSearch®, an environmental information/database retrieval service. A copy of the FirstSearch® report is provided in **Appendix D**, along with a description of the individual databases. The subject property was not listed on any of the databases researched.

3.3.1 Federal Databases

National Priority List (NPL) – No listings were reported within one mile of the subject property.

NPL Delisted – No listings were reported within one-half mile of the subject property.

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) – No listings were reported within one-half mile of the subject property.

CERCLIS (NFRAP) Archive – No listings were reported within one-half mile of the subject property.

Resource Conservation and Recovery Information System (RCRA) Corrective Action Sites (COR) – No listings were reported within one-mile of the subject property.

RCRA TSD Facility List (RCRA-D) – No listings were reported within one-half mile of the subject property.

RCRA Generators (RCRA-G) – No listings were reported within one-quarter mile of the subject property.

RCRA No Longer Regulated (NLR) – No listings were reported within one-eighth mile of the subject property.

Federal IC/EC – No listings were reported within one-quarter mile of the subject property.

Emergency Response Notification System (ERNS) – No listings were reported within one-eighth mile of the subject property.

The subject property was not identified on any of the above-referenced databases researched.

3.3.2 State and Regional Sources

Tribal Lands – One listing was reported within one-mile of the subject property: **Bureau of Indian Affairs Contact I**. Tribal Lands listing are not generally considered rationale for environmental concern, unless the facility has a dual listing, such as a reported release. The listing does not have a dual listing or reported release; therefore, is not considered to be an environmental concern at this time.

State/Tribal Sites – No listings were reported within one mile of the subject property.

State Spills 90 – No listings were reported within one-eighth mile of the subject property.

State/Tribal Solid Waste Landfill (SWL) Sites – No listings were reported within one-half mile of the subject property.

State/Tribal California State Leaking Underground Storage Tanks (LUST) – No listings were reported within one-half mile of the subject property.

State/Tribal Permitted Underground Storage Tanks (UST)/Aboveground Storage Tanks (AST) – No listings were reported within one-quarter mile of the subject property.

State/Tribal IC/EC – No listings were reported within one-quarter mile of the subject property.

State/Tribal Voluntary Cleanup Program Properties (VCP) – No listings were reported within one-half mile of the subject property.

State/Tribal Brownfields – No listings were reported within one-half mile of the subject property.

State Permits – No listings were reported within one-quarter mile of the subject property.

State Other – No listings were reported within one-quarter mile of the subject property.

The subject property was not identified on any of the above-referenced databases researched.

3.4 Regulatory Agency Review

3.4.1 Deer Springs Fire Protection District

EEI contact the Deer Springs Fire Protection District (DSFPD) for information pertaining to hazardous waste releases, spills, incident reports, and/or inspection reports for the subject property. According to staff, the DSFPD does not hold records related to hazardous releases, spills, or UST permits and referred EEI to the County of San Diego Department of Environmental Health (see below). A search by personnel for incident or inspection reports related to the subject property revealed no records on file.

3.4.2 County of San Diego Department of Environmental Health

EEI submitted requests to review public records to the County of San Diego Department of Environmental Health (DEH) for the subject property: APNs 128-290-09 and 128-290-10. According to Ms. Joyce Ellman, Office Support Specialist, no permits were on file.

3.4.3 State Water Resources Control Board

EEI reviewed the online database GeoTracker (2012), which provides records on LUSTs and Spills, Leaks, Investigation and Cleanup (SLIC) sites, which is maintained by the State Water Resources Control Board. Neither the subject property nor any adjacent or nearby properties were listed on any of the databases researched.

3.4.4 Department of Toxic Substances Control

EEI reviewed the online database EnviroStor (2012), which provides records on LUSTs, SLICs, Priority cleanup sites and states sites, which is maintained by the Department of Toxic Substances Control (DTSC). Neither the subject property nor any adjacent or nearby properties were listed on any of the databases researched.

3.4.5 Review of Division of Oil, Gas and Geothermal Resources Files

Oil and gas wells were not observed on the subject property during our subject property reconnaissance. A review of the California Division of Oil, Gas, and Geothermal Resources Website for oil and gas fields in California and Alaska (CDOGGR, 2012) indicated no petroleum exploration or production has occurred on or immediately adjacent to the subject property (identified as within Township 10S, Range 02W, Section 19).

3.4.6 National Pipeline Mapping System

EEI reviewed the National Pipeline Mapping System (NPMS, 2012) public viewer website for gas transmission pipelines and hazardous liquid trunklines on or close to the subject property. According to the information reviewed, no pipelines are located on or in close proximity to the subject property.

3.5 Interview with Current Property Owner

The current owner of the subject property is Ms. Geraldine Jones. EEI provided Ms. Jones with a property owner questionnaire which inquires to the past and present use of the subject property and the presence of any environmental concerns. Information provided by Ms. Jones is summarized below.

3.5.1 Past or Present Uses Indicating Environmental Concern

Ms. Jones stated that the current and past uses of the subject property are as an avocado grove and residence. According to Mrs. Jones, fertilizer is spread in the avocado grove up to four times per year by a contract grove service. In addition, Ms. Jones stated that there is also occasional spraying for thrips in the avocado grove by the contract grove service.

Ms. Jones indicated that there is an Aboveground Storage Tank (AST) located on the subject property which was installed prior to 2006 for the purpose of petrol storage, and has not been used since 2006. Ms. Jones noted that the presence of residue in the AST area is unknown.

Ms. Jones stated that a maintenance building located north of the main residence has an exterior sign indicating that hazardous materials/substances are stored inside. The hazardous materials include fertilizer, poison for the abatement of rats on the premises, external spray for the abatement of thrips used by Hummingbird, Inc. and the contract grove service, Harvest Time. Additionally, Ms. Jones noted that Roundup Pro is stored inside, which she uses for the abatement of weeds around her home.

Ms. Jones stated that there are two 55-gallon drums on the premises. Ms. Jones added that the contents of these drums is unknown, but have been empty since prior to 2006.

3.5.2 Environmental Liens or Governmental Notification

Ms. Jones was not aware of any deed restrictions, environmental liens or governmental notification relating to past or recurrent violations of environmental laws with respect to the property or any facility located on the property.

3.5.3 Presence of Hazardous Substances or Environmental Violations

Ms. Jones was not aware of any past or present environmental violations with respect to the property or any facility located on the property.

3.5.4 Previous Assessments

Ms. Jones was not aware of any previous assessments conducted at the subject property.

3.5.5 Legal Proceedings

Ms. Jones was not aware of any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of any hazardous substance or petroleum products involving the property by any owner or occupant of the property.

3.5.6 Other

Ms. Jones stated there is a pool on the property, and a dam which was created by the Army Corps of Engineers. In addition, Ms. Jones noted that there are no water supply wells located on the subject property.

3.6 User Provided Information

Pursuant to ASTM E1527-05, EEI provided a Phase I ESA User Specific Questionnaire to the “user” (the person on whose behalf the Phase I ESA is being conducted), in this case, Mr. Jon Rilling, with Accretive Investments, Inc., completed the questionnaire. The User Specific Information provided by Mr. Rilling is documented below. A copy of the user specific questions (per ASTM E1527-05) with Mr. Rilling’s associated responses is included in **Appendix E**.

3.6.1 Environmental Liens or Activity and Use Limitations

Mr. Rilling stated that he is not aware of any environmental liens, land use limitations, deed restrictions or governmental notifications relating to past or recurrent violations of environmental laws with respect to the property or any facility located on the property.

3.6.2 Specialized Knowledge

Mr. Rilling stated that he has no specialized knowledge related to the subject property.

3.6.3 Valuation Reduction for Environmental Issues

Mr. Rilling stated that the purchase price for this property reasonably reflects the fair market value of the property.

3.6.4 Presence or Likely Presence of Contamination

Mr. Rilling indicated that he does not know of any specific issues related to past uses, specific chemicals, spills, releases, or cleanups which may have occurred on the property.

3.6.5 Other

Mr. Rilling noted that the Phase I ESA is required due to underwriting and county requirements related to the sale of the property.

3.7 Previous Assessments

Based on the information provided by the property owner, Ms. Jones, no previous assessments (i.e., Phase I ESA) have been conducted on the subject property.

3.8 Other Environmental Issues

3.8.1 Asbestos-Containing Materials

Asbestos, a natural fiber used in the manufacturing of a number of different building materials, has been identified as a human carcinogen. Most friable (i.e., easily broken or crushed) asbestos-containing material (ACM) was banned in building materials by 1978. By 1989, most major manufacturers had voluntarily removed non-friable ACM (i.e., flooring, roofing, and mastics/sealants) from the market. These materials, however, were not banned completely.

In October 1995, the Federal Occupational Safety and Health Administration (OSHA) redefined the manner by which building materials are classified in regards to asbestos and the also the way these materials are to be handled. Under this ruling, “thermal system insulation and sprayed-on or troweled on or otherwise applied surfacing materials” applied before 1980 are considered presumed asbestos containing materials (PACM). Other building materials such as “floor or ceiling tiles, siding, roofing, transite panels” (i.e., non-friable) are also considered PACM unless tested.

An ACM survey was not conducted at the subject property as part of this Phase I ESA. Based on aerial photograph data, the structures located along the west-central portion of the subject property appeared to have been constructed circa-1975. Therefore, it is likely that ACM is present within materials such as floor tiles, wallboard, and roofing. If future improvements or demolition activities are conducted on the subject property structures, EEI recommends ACM testing of building materials prior to improvements.

3.8.2 Lead-Based Paint

Lead-Based paint (LBP) is identified by OSHA, the Environmental Protection Agency (EPA) and the Department Housing and Urban Development Department (HUD) as being a potential health risk to humans, particularly children, based upon its effects to the central nervous system, kidneys, and bloodstream. The risk of lead-based paint has been classified by HUD based upon the age and condition of the painted surface. This classification includes the following:

- maximum risk is from paint applied before 1950;
- a severe risk is present from paint applied before 1960;
- a moderate risk is present from paint applied before 1970;
- a slight risk is present from paint applied before 1977; and
- paint applied after 1977 is not expected to contain lead.

Based on the age (circa-1975) of the structures located along the west-central portion of the subject property, the potential presence of lead-based paint may exist. Painted surfaces, however, appeared to be intact and in good condition at the time of our most recent subject property reconnaissance. If future improvements or demolition activities are conducted on the subject property structures, EEI recommends lead-based paint testing of building materials prior to improvements.

3.8.3 Radon

Radon is a radioactive gas which has been identified as a human carcinogen. Radon gas is typically associated with fine-grained rock and soil, and results from the radioactive decay of radium. The USEPA recommends that homeowners in areas with radon screening levels greater than 4 Picocuries per liter (pCi/L) conduct mitigation of radon gas to reduce exposure.

Sections 307 and 309 of the Indoor Radon Abatement Act of 1988 (IRAA) directed the U.S. EPA to list and identify areas of the US with the potential for elevated indoor radon levels. U.S. EPA's Map of Radon Zones (EPA-402-R-93-071) assigns each of the 3,141 counties in the US to one of three zones based on radon potential:

- Zone 1 counties have a predicted average indoor radon screening level greater than 4 pCi/L.
- Zone 2 counties have a predicted average indoor radon screening level between 2 and 4 pCi/L.
- Zone 3 counties have a predicted average indoor radon screening level less than 2 pCi/L.

Based on such factors as indoor radon measurements; geology; aerial radioactivity; and soil permeability, the U.S. EPA has identified the County of San Diego as Zone 3 (i.e., a predicted average indoor radon screening level less than 2 pCi/L). EEI does not consider radon as a significant environmental concern at this time.

3.8.4 Polychlorinated Biphenyls

Polychlorinated biphenyls (PCB's) are used in electrical equipment, particularly in capacitors and transformers, because they are electrically nonconductive and stable at high temperatures. PCB's persist in the environment, accumulate in organisms, and concentrate in the food chain.

The disposal of these compounds is regulated under the Toxic Substances Control Act, which banned the manufacture and distribution of PCB’s. By Federal definition, PCB equipment contains 500 parts per million (ppm) or more of PCB’s, where PCB-contaminated equipment contains PCB concentrations greater than 50 ppm but less than 500 ppm. The US Environmental Protection Agency (EPA), under TSCA guidance, regulates the removal and disposal of all sources of PCB’s containing 50 ppm or more.

Any electrical equipment containing dielectric insulating fluids or coolants, manufactured prior to 1976, should be considered as potentially PCB-containing. This includes transformers, capacitors, and fluorescent light fittings. In addition, PCB’s may also be found as a stabilizer in older lubricating oils, pesticide extenders, cutting oils, hydraulic fluids, paints, sealants, and flame retardants (UNEP, 1999).

Overhead power lines were observed along the western boundary of the subject property. No pole-mounted transformers were observed in the immediate vicinity of the subject property; however, dense vegetation obstructed the view of the power line. Based on our experience with similar sites surrounding the subject property and San Diego County, the presence of PCB containing pole-mounted transformers is unlikely; therefore, the potential presence of a transformer is not considered an environmental concern at this time.

4.0 SUBJECT PROPERTY RECONNAISSANCE

4.1 Purpose

The purpose of our subject property reconnaissance was to visually and physically observe the subject property, structures, and adjoining properties for conditions indicating an existing release, past release, or threatened release of any hazardous materials/substances or petroleum products into structures on the subject property, or into soil and/or groundwater beneath the subject property. This would include any evidence of contamination, distressed vegetation, petroleum-hydrocarbon surface staining, waste drums, ASTs/USTs, illegal dumping, or improper waste storage/handling. Detailed information is provided in the text below.

4.2 Subject Property

On December 6, 2011, EEI personnel mobilized to the subject property and conducted a walking reconnaissance. Ms. Caron Allison Woodward, Attorney representing the property owner, Ms. Geraldine Jones provided access to the subject property. Visual conditions observed during our reconnaissance of the subject property are documented in a Photographic Log (**Appendix F**), and summarized in **Table 3**.

The subject property is located along a private drive southwest of West Lilac Road, Escondido, California (**Figure 2**). The subject property encompasses a total of 21.34-acres on two (2) contiguous parcels identified as Assessor’s Parcel Numbers (APNs) 128-290-09 and 128-290-10 (**Appendix B**). The subject property is identified by the address: 9431 West Lilac Road.

Access to the subject property can be obtained from an asphalt driveway located along the northeast corner of the property. The driveway bisects the property from the northeast corner to the west-central portion of the property. The subject property is gated, delineated by metal fencing on all sides, and used for agricultural purposes. The subject property is bound by a combination of rural residences, agricultural, and undeveloped land in all directions.

The northern half and portions of the southern half of the subject property is currently developed with avocado trees. The trees are irrigated through a series of underground piping. EEI observed a water supply feature along the northwest corner of the subject property. The east-central portion of the subject property is undeveloped and gullied hillside that is covered with sparse vegetation. Evidence of above and below ground piping (i.e., irrigation lines) was observed throughout the subject property. The west-central portion of the subject property is developed with multiple structures consisting of a two-story main residence, swimming pool, pool equipment, and small metal maintenance shed; maintenance building; barn/worker dwelling; and detached storage units. The structures appeared to be constructed of wood and stucco or a combination of both. EEI was unable to inspect the interior of the maintenance building; however, noted a sign that indicated “poison storage” area. EEI was able to look through a window on the east side of the maintenance building and observed small quantities of fuel, maintenance equipment, and irrigation supplies.

South of the maintenance building is a barn/worker dwelling. EEI was unable to inspect the interior of the barn/worker dwelling. Immediately east of the dwelling was a small wooden enclosure that contained a single 55-gallon storage drum. The drum was labeled “Diesel” and was not situated on secondary containment. Minor staining was noted on and beneath the drum.

Southeast of the barn/worker dwelling and northeast of the main residence is a wooden enclosure that contains one 55-gallon oil drum and one 25-gallon storage drum (contents unknown), and bags (opened and unopened) of various fertilizer. The enclosure also contains an aboveground storage tank (AST) that is approximately 250 to 500 gallons in capacity. The AST is situated within concrete secondary containment. EEI was unable to determine the contents of the AST. Adjacent to the AST enclosure and south of the asphalt driveway is a 250-gallon capacity propane tank. The tank appeared to be in good operating condition.

The main residence is located along the west-central portion of the property. The residence is two stories; contains a detached garage; and an outdoor pool. East of the pool, piping was observed which appeared to supply water and filtration to the pool system. A small metal storage shed is located west of the residence, which contained various gardening tools, fertilizers, and household items. An electrical generator is located east of the storage shed. The generator appeared to be in good operating condition. Evidence of below ground conduit was observed next to the generator.

EEI personnel conducted a reconnaissance of the property by traversing the property from north to south then east to west to physically observe the property and adjoining properties for conditions indicating a potential recognized environmental concern. Concerns would include any evidence of contamination, distressed vegetation, petroleum-hydrocarbon staining, waste drums, illegal dumping, or improper waste storage and/or handling. No evidence of *recognized environmental conditions*, except for the aforementioned AST and storage drums, was noted on the subject property during our subject property reconnaissance efforts.

TABLE 3 Summary of Subject Property Reconnaissance		
Item	Concerns	Comments
General Housekeeping	No	Good.
Surface Spills	No	None observed.
Stained Surfaces	No	Minor staining was observed beneath a 55-gallon storage drum that contained diesel fuel.
Fill Materials	No	None observed.
Pits/Ponds/Lagoons	No	None observed.
Surface Impoundments	No	None observed.
ASTs/USTs	No	An AST (contents unknown) was observed along the west-central portion of the subject property.
Distressed Vegetation	No	None observed.
Wetlands	No	None observed.
Electrical Substations	No	None observed.
Areas of Dumping	No	None observed.
Transformers	No	None observed.
Waste/Scrap Storage	No	None observed.
Chemical Use/Storage	No	Small quantities of fuel, fertilizers, oil, and household cleaning items were observed.

4.3 Adjacent Properties

EEI conducted a visual and auto reconnaissance of the adjoining neighborhoods (to the extent practical) to evaluate the potential for off-site impacts that may affect the subject property. These would include evidence of chemical storage or usage, surface staining or leakage, distressed vegetation, or evidence of illegal dumping.

In general, the subject property is surrounded by rural residences, undeveloped land or agricultural properties. Access was limited; however, immediately adjacent properties were not identified as having environmental related issues on any of the databases researched, and are not considered as an environmental concern at this time. No service stations, dry cleaners, or industrial properties were located in the immediate vicinity.

5.0 LIMITED AGRICULTURAL CHEMICAL SURVEY

The subject property has been and continues to be utilized for agricultural purposes (i.e., avocado orchard). It is likely that restricted agricultural chemicals were applied to subject property soils, which is a potential REC. Based on the future planned property use (residential), additional investigation efforts (i.e., soil sampling and analysis) were performed by EEI to further evaluate subject property soils for agricultural chemicals.

There is no specific guidance regarding the testing and analysis of heavy metals and/or pesticides on soils at residential building sites in San Diego County. Therefore, EEI relied principally on the Department of Toxic Substance Control's (DTSC) August 2008 “*Interim Guidance For Sampling Agricultural Properties*”, combined with our experience gathered over the last two decades. The DTSC document provides guidance for sampling of former agricultural properties (undisturbed) where pesticides and/or fertilizers were presumably applied uniformly, for agricultural purposes, consistent with normal application practices.

The DTSC document was initially prepared for use in evaluating soil at proposed new school sites and existing schools undergoing expansion projects where the property was currently or previously used for agricultural activities, but has been expanded to provide a uniform and streamlined approach for evaluating agricultural properties.

Based on the size of the property (21.34-acres), and EEI’s experience at similar sites, a total of twenty four (24) discrete soil samples, were collected at near-surface (6-inches below grade) locations on the subject property. The following sections discuss our investigation activities.

5.1 Field Investigation

On December 6, 2011, EEI personnel mobilized to the subject property to conduct soil sampling activities with a shovel. Soil sampling locations were selected with the goal of collecting representative soil samples from the subject property. A total of twenty-four discrete locations (identified as ACR-1 through ACR-24, **Figure 3**) were chosen to provide representative coverage.

Samples were collected approximately 6- inches below ground surface (bgs), using a shovel. Sample material was extracted from the ground and placed in laboratory-supplied, 4-ounce glass jars. The jar was sealed with a Teflon-lined cap, and labeled with a number unique to the sample. The samples were placed in a chilled cooler and subsequently picked up by SunStar Labs, a California State-certified laboratory, under proper Chain-of-Custody (COC) documentation.

5.2 Laboratory Analytical Testing

All 24 discrete soil samples (ACR-1 through ACR-24) collected during this investigation were analyzed for Arsenic and Lead by United States Environmental Protection Agency (U.S. EPA) Test Method 6010B. Additionally, EEI instructed the laboratory, per DTSC guidelines, to create a total of six (6) composite samples (identified as Composite #1 through Composite #6) from the discrete samples at a ratio of 4:1. All six (6) composite samples (Composite #1 through Composite #6) were analyzed for Organochlorine Pesticides by U.S. EPA Test Method 8081A. The following bulleted items summarize the results of laboratory analytical testing:

- No concentrations of arsenic were detected above the laboratory reporting limit (i.e., “non-detect”).
- Lead was detected above the laboratory detection limit in samples ACR-2, ACR-15, ACR-18, ACR-21 and ACR-22 at 3.4 milligrams per kilogram (mg/kg), 5.6 mg/kg, 11 mg/kg, 3.1 mg/kg and 4.2 mg/kg, respectively. No other samples analyzed detected lead above the laboratory reporting limit (i.e., “non-detect”).
- Gamma-Chlordane was reported at 5.6 µg/kg in sample Composite #2. No other composite samples detected gamma-Chlordane above the laboratory reporting limit (i.e., “non-detect”).
- Alpha-Chlordane was reported at 28 µg/kg in sample Composite #2. No other composite samples detected alpha-Chlordane above the laboratory reporting limit (i.e., “non-detect”).
- No other organochlorine pesticides were detected above the laboratory reporting limit (i.e., “non-detect”) in any other composite samples.

The attached **Table 4** summarizes laboratory analytical results. Complete laboratory reports and COC documentation are provided in **Appendix G**.

TABLE 4 Soil Sample Results									
Sample ID	Depth (inches bgs)	Date Sampled	EPA 6010B		EPA 8081A				
			Arsenic	Lead	Dieldrin	DDE	DDD	DDT	All Other Constituents
			Reported in mg/kg		Reported in µg/kg				
ACR-1	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-2	6	12/7/2011	<5	3.4	NA	NA	NA	NA	NA
ACR-3	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-4	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-5	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-6	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-7	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-8	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-9	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-10	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-11	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-12	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-13	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-14	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-15	6	12/7/2011	<5	5.6	NA	NA	NA	NA	NA
ACR-16	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-17	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-18	6	12/7/2011	<5	11	NA	NA	NA	NA	NA
ACR-19	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-20	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-21	6	12/7/2011	<5	3.1	NA	NA	NA	NA	NA
ACR-22	6	12/7/2011	<5	4.2	NA	NA	NA	NA	NA
ACR-23	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
ACR-24	6	12/7/2011	<5	<3	NA	NA	NA	NA	NA
Composite #1	6	12/7/2011	NA	NA	<5	<5	<5	<5	<5-200
Composite #2	6	12/7/2011	NA	NA	<5	<5	<5	<5	gamma-Chlordane:5.6; alpha-Chlordane:28
Composite	6	12/7/2011	NA	NA	<5	<5	<5	<5	<5-200

TABLE 4 Soil Sample Results									
Sample ID	Depth (inches bgs)	Date Sampled	EPA 6010B		EPA 8081A				
			Arsenic	Lead	Dieldrin	DDE	DDD	DDT	All Other Constituents
			Reported in mg/kg		Reported in µg/kg				
#3									
Composite #4	6	12/7/2011	NA	NA	<5	<5	<5	<5	<5-200
Composite #5	6	12/7/2011	NA	NA	<5	<5	<5	<5	<5-200
Composite #6	6	12/7/2011	NA	NA	<5	<5	<5	<5	<5-200
Laboratory Reporting Limit			5	3	5	5	5	5	5-200
Residential CHHSLs			0.07	150	35	1,600	2,300	1,600	Chlordane - 430
bgs = below ground surface; CHHSL = California Human Health Screening Levels; EPA = Environmental Protection Agency; mg/kg = milligrams per kilogram; NA = Not Applicable/Analyzed; µg/kg = micrograms per kilogram.									

5.3 Discussion of Testing Results

The results of our limited agricultural chemical survey revealed no concentrations of arsenic was detected above the laboratory reporting limit (i.e., “non-detect”) in the soil samples collected from the subject property.

Concentrations of lead were detected in discrete samples ACR-2, ACR-15, ACR-18, ACR-21 and ACR-22 and select organochlorine pesticides (gamma-Chlordane and alpha-Chlordane) were detected in sample Composite #2.

EEI compared the reported lead and Chlordane concentrations to the California Human Health Screening Levels (CHHSL) for a residential land use scenario. The CHHSLs are concentrations of select hazardous chemicals that are used to estimate and compare reported values in soil to risk to human health. The following bulleted items summarize the reported values:

- The detected lead concentrations of in samples ACR-2, ACR-15, ACR-18, ACR-21 and ACR-22 at 3.4 mg/kg, 5.6 mg/kg, 11 mg/kg, 3.1 mg/kg and 4.2 mg/kg, respectively, collected during this investigation are less than the CHHSL residential screening level of 150 mg/kg. Furthermore, the lead concentrations appear to represent background levels inherent to soil in the site vicinity. Trace or background levels for soils within central and southwestern San Diego County range from 15.6 mg/kg to 57.1 mg/kg (Kearney Foundation Special Report, 1996).
- The reported values of gamma-Chlordane and alpha-Chlordane (5.6 ug/kg and 28 ug/kg, respectively) were less than the CHHSL residential screening level of 430 ug/kg.

6.0 FINDINGS AND OPINIONS

Based on the information obtained in this ESA, EEI has the following findings and opinions:

- Known or suspected RECs – The following known or suspected RECs have been identified during the preparation of this ESA:
 - The subject property has been and continues to be utilized for agricultural purposes (i.e., avocado orchard). Based on the future planned property use (residential), additional investigation efforts (i.e., soil sampling and analysis) were performed by EEI to further evaluate subject property soils for agricultural chemicals.

The results of our limited agricultural chemical survey (see Section 5.0 –Limited Agricultural Chemical Survey) revealed no concentrations of arsenic in the soil samples collected from the subject property above the laboratory reporting limit (i.e., non-detect). Concentrations of lead and organochlorine pesticides (gamma-Chlordane and alpha-Chlordane) were detected in the soil samples collected during this investigation; however, the levels were less than applicable residential screening values. Therefore, further investigation does not appear to be warranted at this time.
 - An above groundstorage tank (AST), approximately 250 to 500 gallons in capacity, of unknown contents is located within a concrete secondary containment area on the subject property. Additionally, one 55-gallon diesel fuel storage drum, one 55-gallon oil drum and one 25-gallon storage drum (contents unknown), are located on the subject property and will require further action prior to any future site development.
 - Small quantities of hazardous materials were observed and noted by the property owner to exist on the subject property.
- Historical REC’s – No historical REC’s have been revealed during the preparation of this ESA.
- *De Minimis* Conditions – No de minimis conditions have been revealed during the preparation of this ESA.

7.0 DATA GAPS AND DEVIATIONS FROM ASTM PRACTICES

Section 3.2.20 (ASTM 1527-05) defines a data gap as “a lack or inability to obtain information required by the practice despite good faith efforts of the environmental professional to gather such information.”

7.1 Historical Data Gaps

No historical data gaps were identified during our research efforts.

7.2 Regulatory Data Gaps

No regulatory data gaps were identified during our research efforts.

7.3 On-site Data Gaps

No on-site data gaps were identified during our research efforts.

7.4 Deviations from ASTM Practices

Section 12.10 (ASTM 1527-05), states that all deletions and deviations from this practice shall be listed individually and in detail, including client imposed constraints, and all additions should be listed.

EEI believes that there are no exceptions to, or deletions from, the ASTM Designation E1527-05 Guidelines.

8.0 CONCLUSIONS

We have performed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Designation E1527-05 for the subject property located at 9431 West Lilac Road, Escondido, California. Any exceptions to, or deletions from, this practice are described in Section 7.0 of this report. Phase I ESA has revealed no evidence of *recognized environmental conditions* in connection with the property, except for the following:

- An above ground storage tank (AST), approximately 250 to 500 gallons in capacity, of unknown contents is located within a concrete secondary containment area on the subject property. EEI recommends that any residual fuel within the AST be removed and the tank disposed of according to local and state guidelines, prior to any future site activities. Furthermore, confirmation soil sampling should be conducted beneath the AST to evaluate soils for potential hydrocarbon contamination.

Additionally, one 55-gallon diesel fuel storage drum, one 55-gallon oil drum and one 25-gallon storage drum (contents unknown), are located on the subject property. EEI recommends that these drums be removed, and properly disposed of offsite.

- All known or suspected hazardous materials/substances stored on-site should be inventoried and properly disposed of off-site prior to any future site improvements.

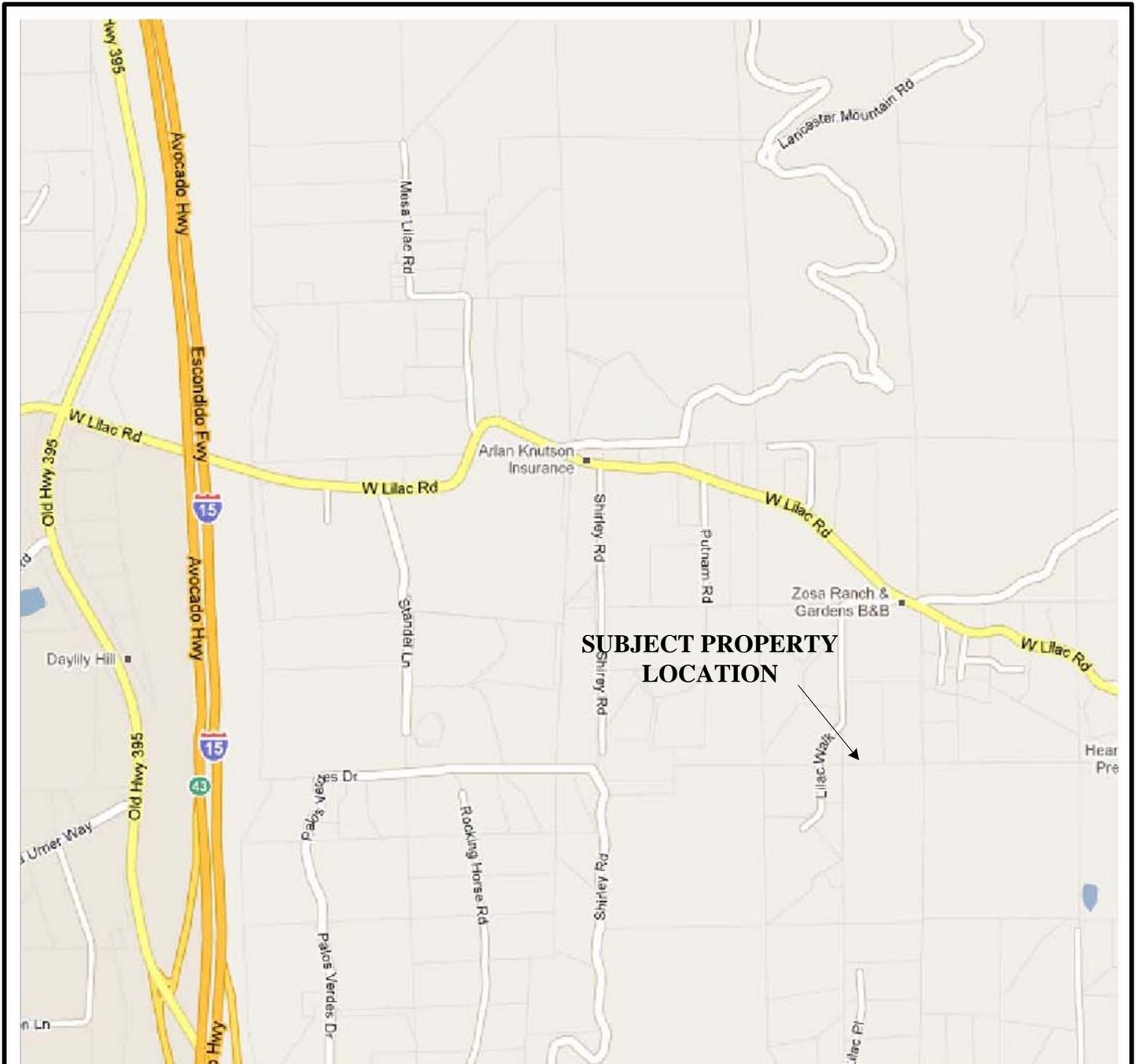
In addition to the above bulleted items, EEI has the following comments:

- There is a potential for Asbestos-Containing Material (ACM) and Lead-Based Paint (LBP) to be present in structures built prior to 1978. Prior to any future property improvements or demolition activities, ACM and LBP testing of on-site structures will likely be required.
- Based on the subject property's historical agricultural use, it is possible that buried/concealed/hidden agricultural by-products, both below and above ground may have existed or exists on the subject property. Any buried trash/debris, or other waste encountered during future subject property development should be evaluated by an experienced environmental consultant prior to removal. If stained or suspicious soil is encountered during future grading operations, the material should be evaluated and if deemed necessary, characterized for proper disposal.

9.0 REFERENCES

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FIGURES



Map Source: Google Maps®, Accessed, January 2012



Scale: 1" = 1,250'

0 750 FT 1,250 FT 2,500 FT



Note All Locations Are Approximate

SITE LOCATION MAP
 ACCRETIVE INVESTMENTS, INC.
 21.34-Acre "Jones" Property
 APNs 128-290-09 and 128-290-10
 9431 West Lilac Road, Escondido, California 92026
 EEI Project No. ACR-71398
 Created January 2012



FIGURE 1