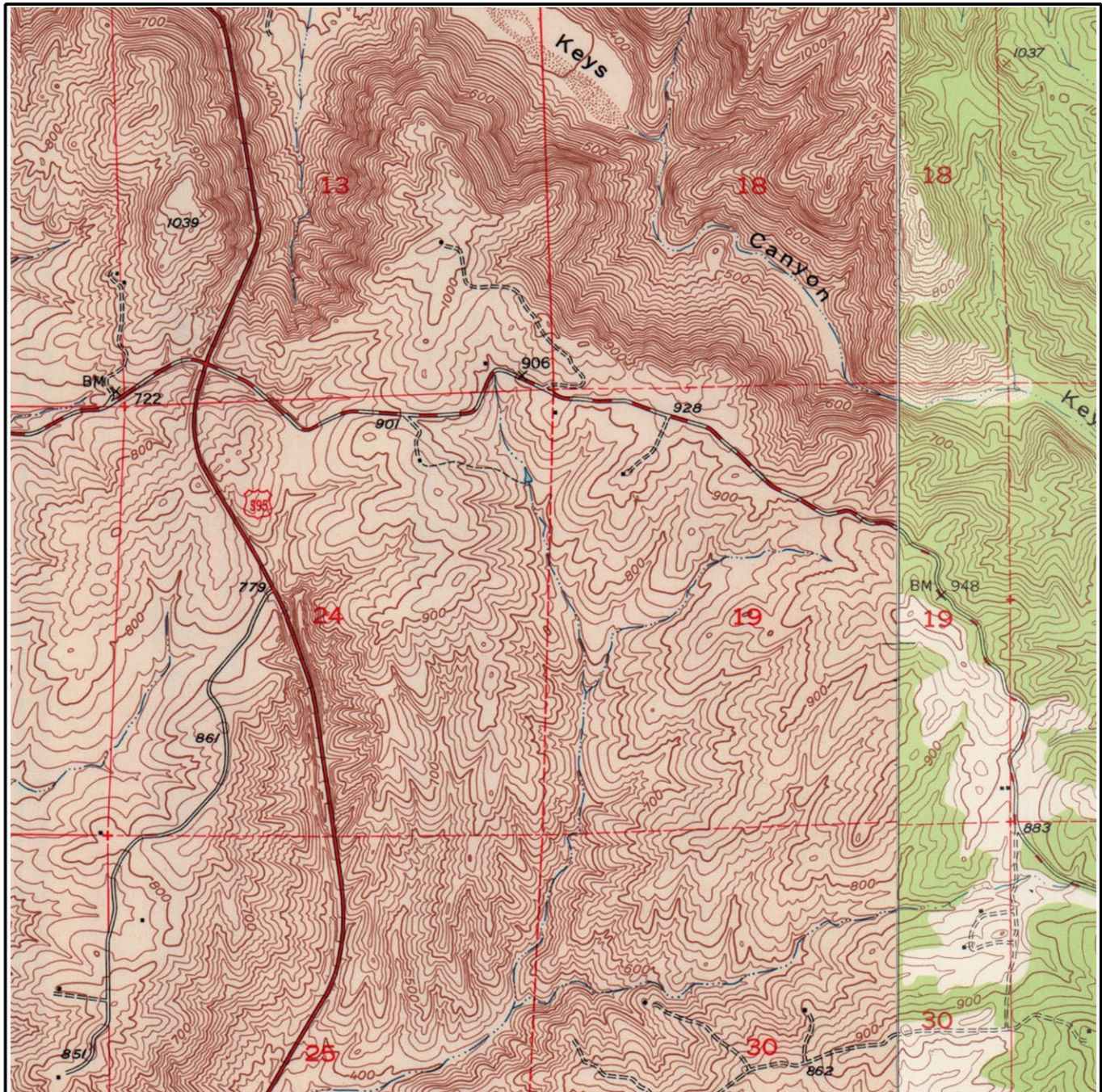


Environmental FirstSearch

Historical Topographic Map

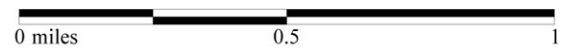
Quad Name: Bonsall, CA
Year: 1948 Original Map Scale: 1:24,000

Escondido, CA



Job Number: ACR_712691
Target Site: 33.294918, -117.139467

E Quad Name: Pala, CA
Year: 1949



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

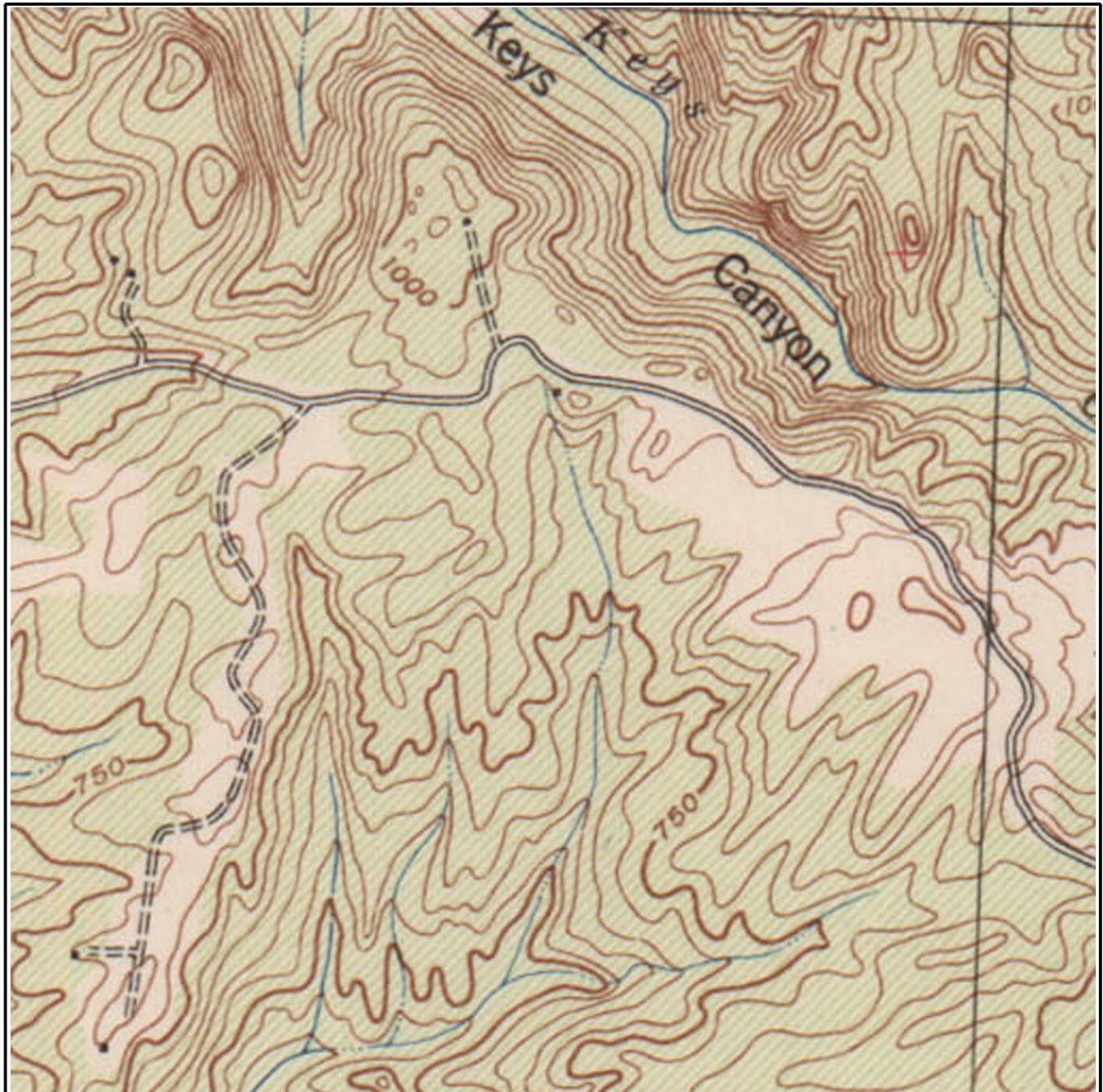


Environmental FirstSearch

Historical Topographic Map

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

Escondido, CA



Job Number: ACR_712691
Target Site: 33.294918, -117.139467

0 miles 0.5 1

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



Prepared for: Brian Brennan – EEI

Client Job No/Name: ACR 712691

TIS Log No: 60480

Subject Property:

32250 Shirey Road
Escondido, CA 92026

April 2, 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
--

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

2010 Haines: North San Diego County p. 713		
32236 Shirey Road Joo Haehong	32250 Shirey Road No Response	32252 Shirey Road No Response
2005 Haines: North San Diego County p. 751		
32236 Shirey Road Joo Haehong	32250 Shirey Road Address not listed	32252 Shirey Road Michil Israel
2000 Haines: North San Diego County p. 708		
32236 Shirey Road No Response	32250 Shirey Road Kawamura Shigemasa	32252 Shirey Road Michel Serafin
1995 Haines: North San Diego County p. 541		
32236 Shirey Road Horstman Jerry; Horstman Sandy	32250 Shirey Road No Response	32252 Shirey Road Smith Elmer C
1990 Haines: North San Diego County p. 461		
32236 Shirey Road Horstman Jerry; Horstman Sandy	32250 Shirey Road Dawson Kenneth	32252 Shirey Road Smith Elmer C
End Of Search due to: A) earlier directory or street listing not found; <i>B) listing out of range, listings re-numbered, or no numeric listings</i>		

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
COUNTY OF SAN DIEGO FILES**

[Help](#) [Home](#)[Look Up](#)[Permits](#)[Geo Areas](#)[Summary](#)

Permits on Selected Parcel

APN:	128-440-01-00	Alt. APN:	-1049-A7
Address:	32250 SHIREY RD	Type:	

Permit	Description	Address	Issued	Status
3700 98-0206	BOUNDARY ADJUSTMENT	32250 SHIREY RD	20-Oct-1998	DONE

[County of San Diego](#) | [Land Use and Environment Group](#)

**APPENDIX E
ENVIRONMENTAL RECORDS SEARCH**

TRACK ► INFO SERVICES, LLC

Environmental FirstSearch™ Report

Target Property:

KAWAMURA PROPERTY /32250 SHIREY ROAD

ESCONDIDO CA 92026

Job Number: ACR_712691

PREPARED FOR:

EEI

2195 Faraday Avenue Suite K

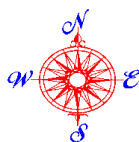
Carlsbad Ca 92008

03-26-11



Tel: (866) 664-9981

Fax: (818) 249-4227

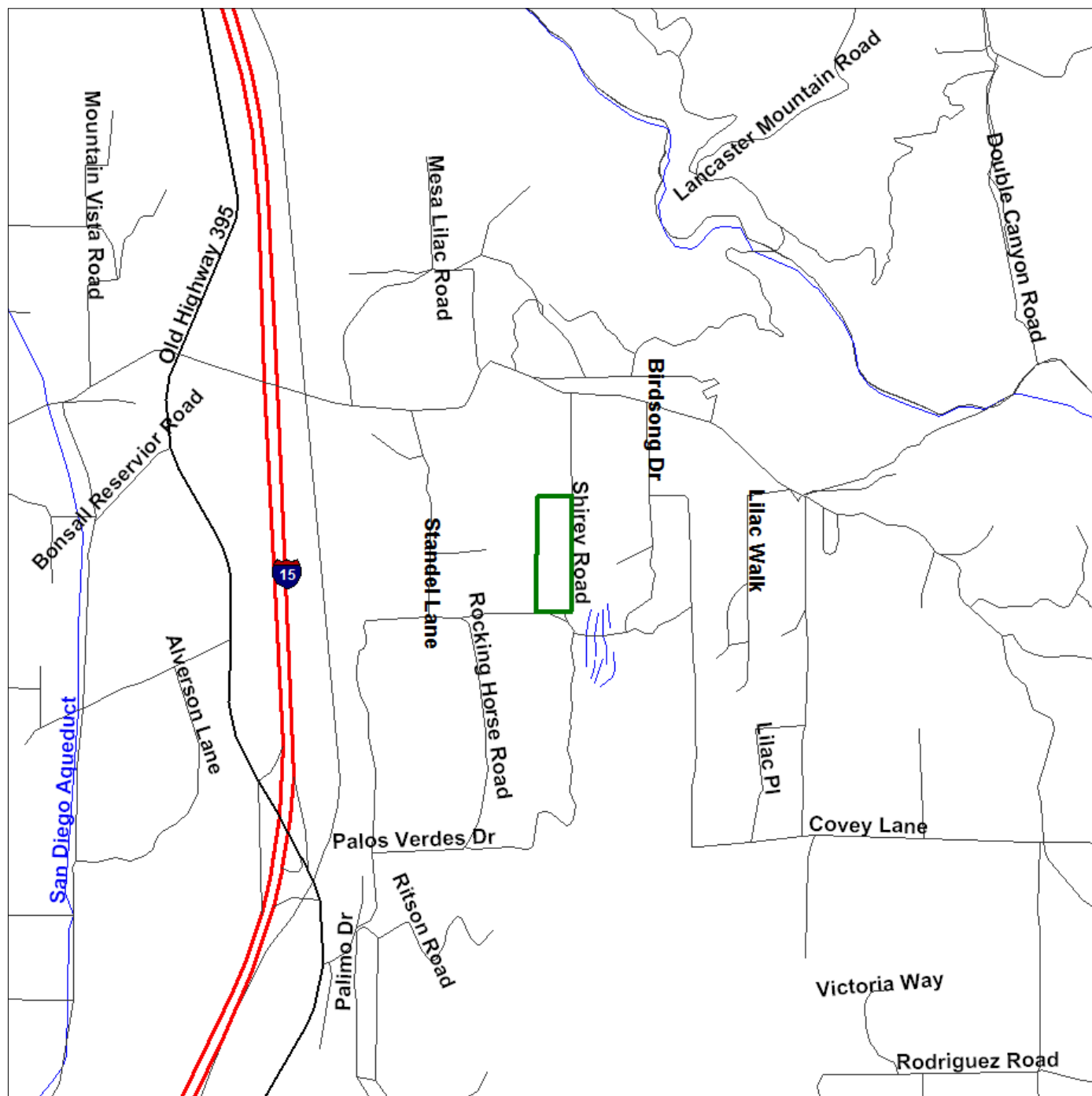


Environmental FirstSearch

1 Mile Radius from Area
Single Map:



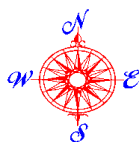
KAWAMURA PROPERTY /32250 SHIREY ROAD, ESCONDIDO CA 92



Source: U.S. Census TIGER Files

Area Polygon
Identified Site, Multiple Sites, Receptor
NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
Triballand.....
Railroads



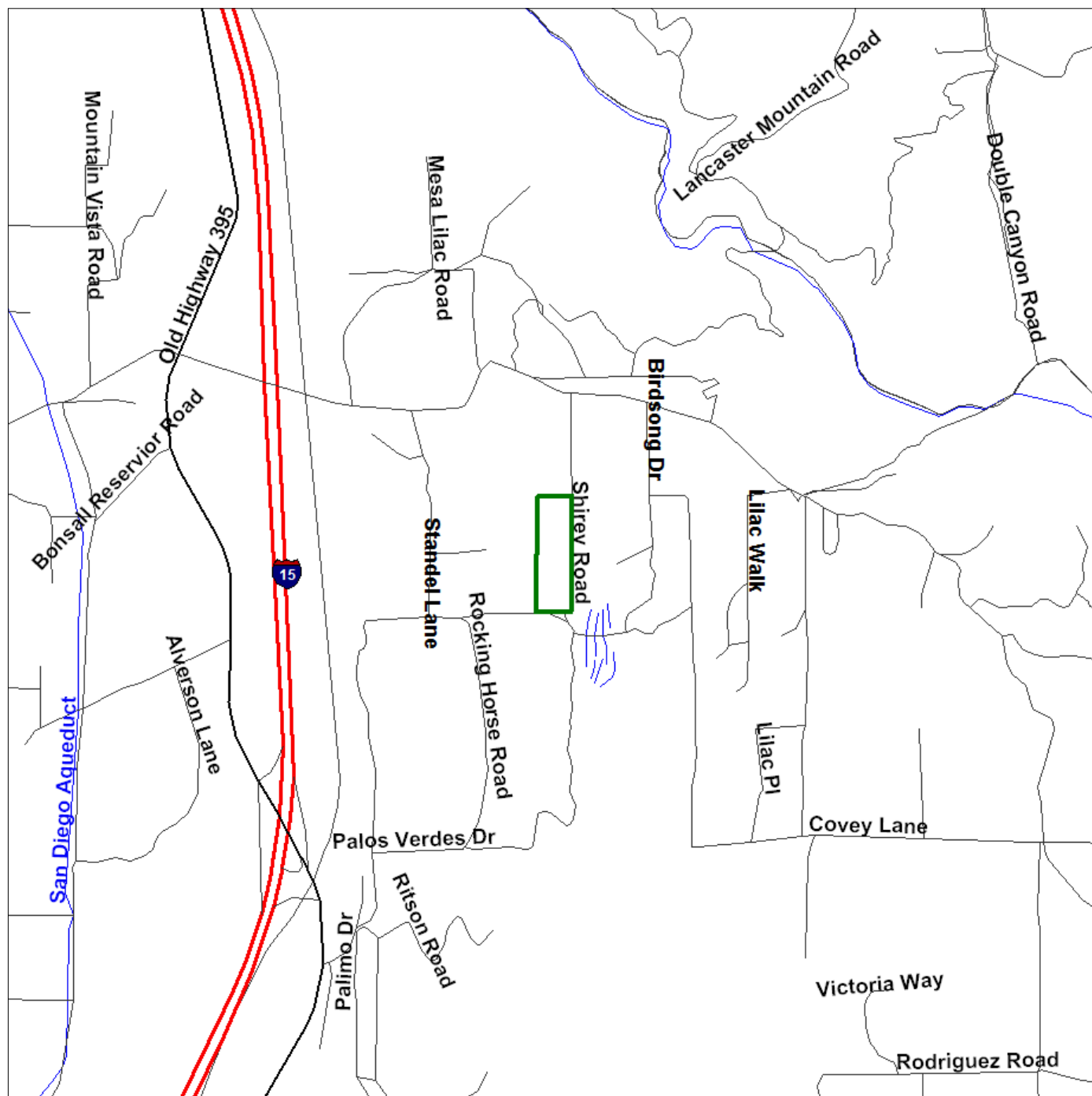


Environmental FirstSearch

1 Mile Radius from Area
ASTM-05: NPL, RCRCOR, STATE



KAWAMURA PROPERTY /32250 SHIREY ROAD, ESCONDIDO CA 92



Source: U.S. Census TIGER Files

Area Polygon
Identified Site, Multiple Sites, Receptor
NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
Triballand.....
Railroads





Environmental FirstSearch

.5 Mile Radius from Area
ASTM-05: Multiple Databases

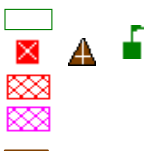


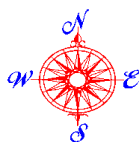
KAWAMURA PROPERTY /32250 SHIREY ROAD, ESCONDIDO CA 92



Source: U.S. Census TIGER Files

Area Polygon
Identified Site, Multiple Sites, Receptor
NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste
Triballand.....
Railroads





Environmental FirstSearch
.25 Mile Radius from Area
ASTM-05: RCRA GEN, UST, PERMITS, OTHER

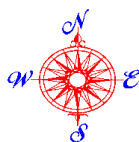


KAWAMURA PROPERTY /32250 SHIREY ROAD, ESCONDIDO CA 92



Source: U.S. Census TIGER Files

Area Polygon	
Identified Site, Multiple Sites, Receptor	
NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste	
Triballand.....	
Railroads	

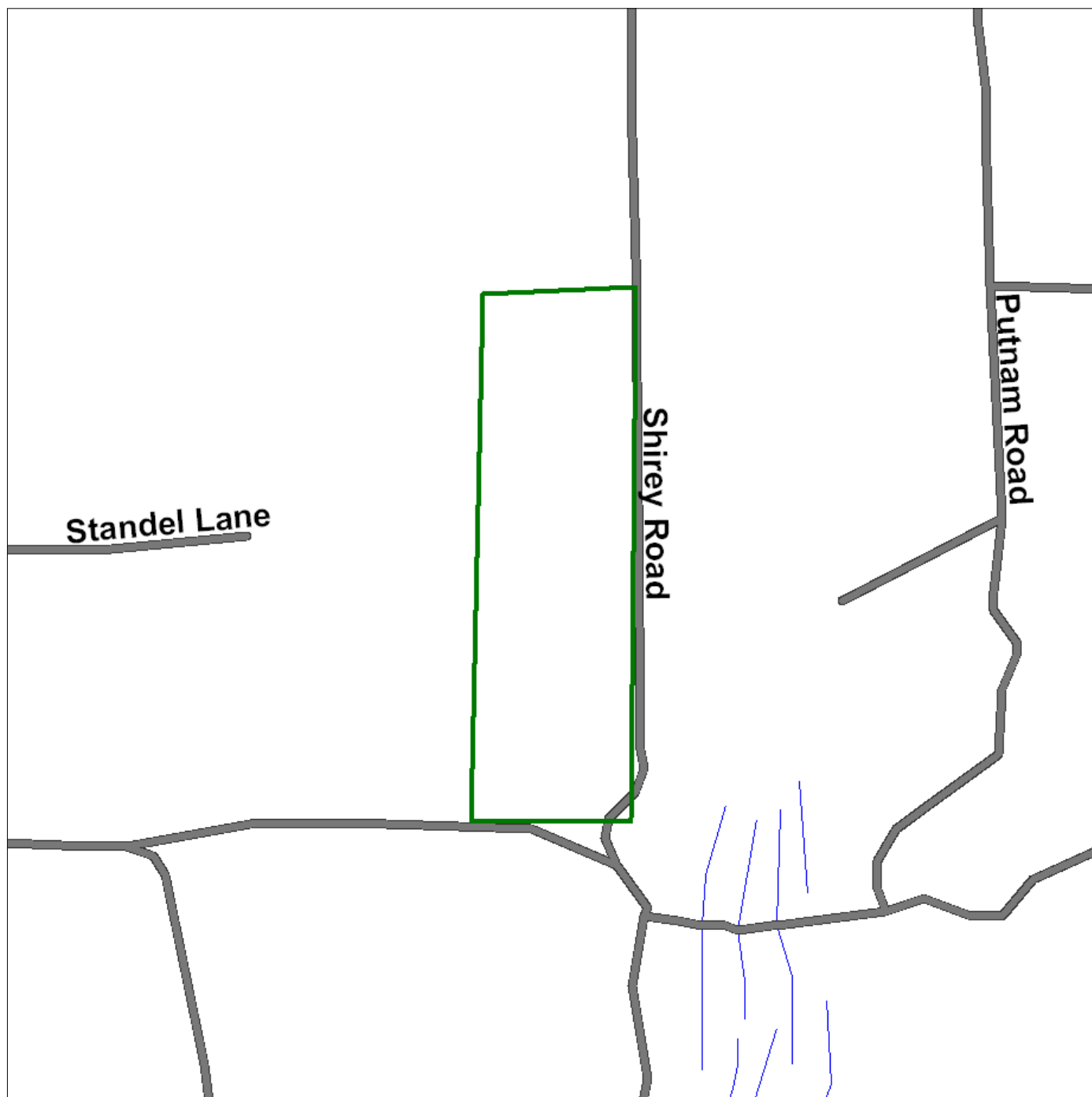


Environmental FirstSearch

.12 Mile Radius from Area
ASTM-05: SPILLS90, ERNS, RCRANLR



KAWAMURA PROPERTY /32250 SHIREY ROAD, ESCONDIDO CA 92



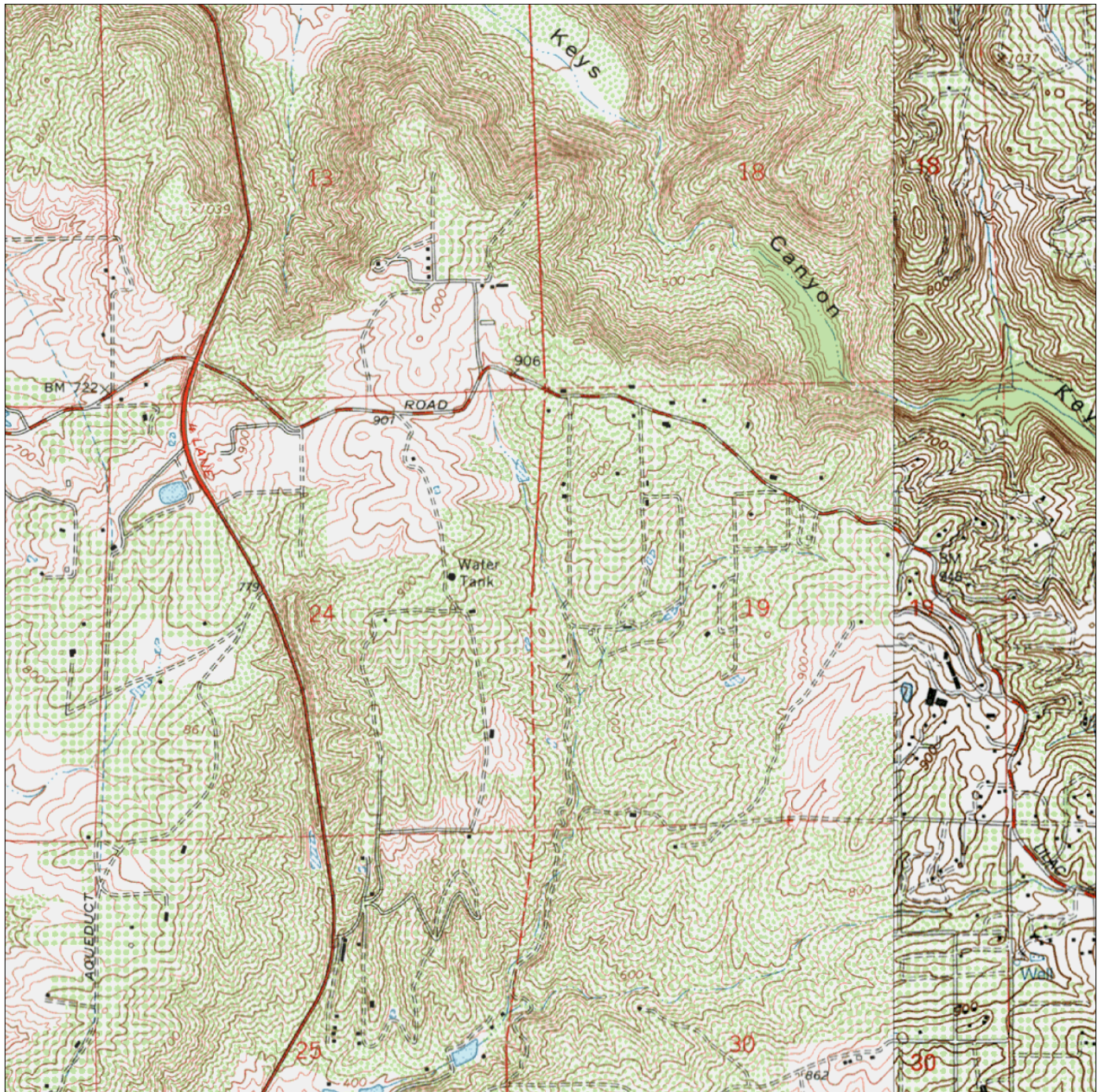
Source: U.S. Census TIGER Files

Area Polygon	
Identified Site, Multiple Sites, Receptor	
NPL, DELNPL, Brownfield, Solid Waste Landfill (SWL), Hazardous Waste	
Triballand.....	
Railroads	

Site Location Map

Topo : 1.25 Mile Radius from Area

KAWAMURA PROPERTY /32250 SHIREY ROAD, 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

0 825 1,650 3,300 4,950 6,600 Feet



Data Supplied by:

Prepared by FirstSearch Technology Corporation 03-26-11

JOB NO.

ACR_712691

Map Name: BONSALE

Date Created: 1968

Date Revised: 1975

FIGURE NO.

Map Reference Code: 33117-C2-TF-024

Contour Interval: 20 feet

1



Environmental FirstSearch Search Summary Report

Target Site: KAWAMURA PROPERTY /32250 SHIREY ROAD
ESCONDIDO CA 92026

FirstSearch Summary

Database	Sel	Updated	Radius	Site	1/8	1/4	1/2	1/2>	ZIP	TOTALS
NPL	Y	01-14-11	1.00	0	0	0	0	0	0	0
NPL Delisted	Y	01-14-11	0.50	0	0	0	0	-	0	0
CERCLIS	Y	01-26-11	0.50	0	0	0	0	-	0	0
NFRAP	Y	01-26-11	0.50	0	0	0	0	-	0	0
RCRA COR ACT	Y	11-10-10	1.00	0	0	0	0	0	0	0
RCRA TSD	Y	01-11-11	0.50	0	0	0	0	-	0	0
RCRA GEN	Y	01-11-11	0.25	0	0	0	-	-	0	0
RCRA NLR	Y	01-11-11	0.12	0	0	-	-	-	0	0
Federal IC / EC	Y	03-01-11	0.25	0	0	0	-	-	0	0
ERNS	Y	01-24-11	0.12	0	0	-	-	-	0	0
Tribal Lands	Y	12-01-05	1.00	0	0	0	0	0	0	0
State/Tribal Sites	Y	03-14-11	1.00	0	0	0	0	0	0	0
State Spills 90	Y	03-09-11	0.12	0	0	-	-	-	0	0
State/Tribal SWL	Y	03-07-11	0.50	0	0	0	0	-	0	0
State/Tribal LUST	Y	03-07-11	0.50	0	0	0	0	-	0	0
State/Tribal UST/AST	Y	10-27-10	0.25	0	0	0	-	-	0	0
State/Tribal EC	Y	NA	0.25	0	0	0	-	-	0	0
State/Tribal IC	Y	03-09-11	0.25	0	0	0	-	-	0	0
State/Tribal VCP	Y	03-14-11	0.50	0	0	0	0	-	0	0
State/Tribal Brownfields	Y	NA	0.50	0	0	0	0	-	0	0
State Permits	Y	10-13-10	0.25	0	0	0	-	-	0	0
State Other	Y	03-14-11	0.25	0	0	0	-	-	0	0
- TOTALS -				0	0	0	0	0	0	0

Notice of Disclaimer

Due to the limitations, constraints, inaccuracies and incompleteness of government information and computer mapping data currently available to TRACK Info Services, certain conventions have been utilized in preparing the locations of all federal, state and local agency sites residing in TRACK Info Services'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 TRACK Info Services uses its best efforts to research the actual location of each site, TRACK Info Services does not and can not warrant the accuracy of these sites with regard to exact location and size. All authorized users of TRACK Info Services's services proceeding are signifying an understanding of TRACK Info Services'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: 03-26-11
Requestor Name: Brian Brennan
Standard: ASTM-05

Search Type: AREA
0.02 sq mile(s)
Job Number: ACR_712691
Filtered Report

Target Site: KAWAMURA PROPERTY /32250 SHIREY ROAD
ESCONDIDO CA 92026

Demographics

Sites: 0 **Non-Geocoded:** 0 **Population:** NA
Radon: 0.4 PCI/L

Site Location

	<u>Degrees (Decimal)</u>	<u>Degrees (Min/Sec)</u>		<u>UTMs</u>
Longitude:	-117.139467	-117:8:22	Easting:	487014.799
Latitude:	33.294918	33:17:42	Northing:	3683798.897
			Zone:	11

Comment

Comment:

Additional Requests/Services

Adjacent ZIP Codes: 1 Mile(s)

Services:

ZIP Code	City Name	ST	Dist/Dir	Sel
92003	BONSALL	CA	0.62 NW	Y

	Requested?	Date
Sanborns	No	
Aerial Photographs	Yes	03-26-11
Historical Topos	Yes	03-26-11
City Directories	Yes	03-26-11
Title Search/Env Liens	No	
Municipal Reports	No	
Online Topos	Yes	03-26-11

***Environmental FirstSearch
Sites Summary Report***

Target Property: KAWAMURA PROPERTY /32250 SHIREY ROAD **JOB:** ACR_712691
ESCONDIDO CA 92026

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

Page No.	DB Type	Site Name/ID/Status	Address	Dist/Dir	Map ID
-----------------	----------------	----------------------------	----------------	-----------------	---------------

Environmental FirstSearch
Site Detail Report

Target Property: KAWAMURA PROPERTY /32250 SHIREY ROAD **JOB:** ACR_712691
ESCONDIDO CA 92026

No sites were found!

Environmental FirstSearch
Site Detail Report

Target Property: KAWAMURA PROPERTY /32250 SHIREY ROAD **JOB:** ACR_712691
ESCONDIDO CA 92026

No sites were found!

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 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.

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.

Facilities 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.

Federal IC / EC: 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.

FEDERAL ENGINEERING AND INSTITUTIONAL CONTROLS- Superfund sites that have either an engineering or an institutional control. The data includes the control and the media contaminated.

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.

State/Tribal Sites: CA EPA SMBRPD / CAL SITES- The California Department of Toxic Substances Control (DTSC) has developed an electronic database system 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), also

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. The categories are:

1. CalSites Properties (CS)
2. School Property Evaluation Program Properties (SCH)
3. Voluntary Cleanup Program Properties (VCP)
4. Unconfirmed Properties Needing Further Evaluation (RFE)
- Please Note: FirstSearch Reports list the above sites as DB Type (STATE).
5. Unconfirmed Properties Referred to Another Local or State Agency (REF)
6. Properties where a No Further Action Determination has been made (NFA)

Please Note: FirstSearch Reports list the above sites as DB Type (OTHER).

Each Category contains information on properties based upon the type of work taking place at the site. For example, the CalSites database is now one of the six categories within SMPBRD and contains only confirmed sites considered as posing the greatest threat to the public and/or the potential public school sites will be found within the School Property Evaluation Program, and those properties undergoing voluntary investigation and/or cleanup are in the Voluntary Cleanup 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. The CAL EPA Dept. of Toxic Substances Control compiles information from subsets of the following databases to make up the CORTESE list:

1. The Dept. of Toxic Substances Control; contaminated or potentially contaminated hazardous waste sites listed in the CAL Sites database. Formerly known as ASPIS are included (CALSITES formerly known as ASPIS).
2. The California State Water Resources Control Board; listing of Leaking Underground Storage Tanks are included (LTANK)
3. The California Integrated Waste Management Board; Sanitary Landfills which have evidence of groundwater contamination or known migration of hazardous materials (formerly WB-LF, now AB 3750).

Note: Track Info Services collects each of the above data sets individually and lists them separately in the following First Search categories in order to provide more current and comprehensive information: CALSITES: SPL, LTANK: LUST, WB-LF: SWL

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 the First Search reports; therefore, it may not be possible to locate or plot some sites in First Search 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 the First Search reports; therefore, it may not be possible to locate or plot some sites in First Search 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 UNDERGROUND 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. Track Info Services included the UST information from the FIDS database in its First Search reports for historical purposes to help its 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: Track Info Services, LLC collects and maintains information regarding Underground Storage Tanks from 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 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), also 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. The categories are:

1. CalSites Properties (CS)
2. School Property Evaluation Program Properties (SCH)
3. Voluntary Cleanup Program Properties (VCP)
4. Unconfirmed Properties Needing Further Evaluation (RFE)
5. Unconfirmed Properties Referred to Another Local or State Agency (REF)
6. Properties where a No Further Action Determination has been made (NFA)

Please Note: FirstSearch Reports list the above sites as DB Type VC. Each Category contains information on properties based upon the type of work taking place at the site. The VC category contains only those properties undergoing voluntary investigation and/or cleanup and which are listed in the Voluntary Cleanup Program.

RADON: NTIS NATIONAL RADON DATABASE - EPA radon data from 1990-1991 national radon project collected for a variety of zip codes across the United States.

State Permits: CA 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 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), also 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. The categories are:

1. CalSites Properties (CS)
 2. School Property Evaluation Program Properties (SCH)
 3. Voluntary Cleanup Program Properties (VCP)
 4. Unconfirmed Properties Needing Further Evaluation (RFE)
- Please Note: FirstSearch Reports list the above sites as DB Type (STATE).
5. Unconfirmed Properties Referred to Another Local or State Agency (REF)
 6. Properties where a No Further Action Determination has been made (NFA)
- Please Note: FirstSearch Reports list the above sites as DB Type (OTHER).

Each Category contains information on properties based upon the type of work taking place at the site. For example, the CalSites database is now one of the six categories within SMPBRD and contains only confirmed sites considered as posing the greatest threat to the public and/or the potential public school sites will be found within the School Property Evaluation Program, and those properties undergoing voluntary investigation and/or cleanup are in the Voluntary Cleanup Program.

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.

State Other: US DOJ NATIONAL CLANDESTINE LABORATORY REGISTER - Database of addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the U.S. Department of Justice ("the Department"), and the Department has not verified the entry and does not guarantee its accuracy. All sites that are included in this data set will have an id that starts with NCLR.

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 Environmental Protection Agency.

Updated quarterly

RCRA NLR: EPA Environmental Protection Agency

Updated quarterly

Federal IC / EC: EPA Environmental Protection Agency

Updated quarterly

ERNS: EPA/NRC Environmental Protection Agency

Updated semi-annually

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

Updated annually

State/Tribal Sites: CA EPA The CAL EPA, Depart. Of Toxic Substances Control

Phone: (916) 323-3400

Updated quarterly/when available

State Spills 90: CA EPA The California State Water Resources Control Board

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

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

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:

Updated quarterly/annually/when available

State/Tribal IC: CA EPA The California EPA Department of Toxic Substances Control.

Updated Updated quarterly/annually/when available

State/Tribal VCP: CA EPA The California EPA Department of Toxic Substances Control.

Updated Updated quarterly/annually/when available

RADON: NTIS Environmental Protection Agency, National Technical Information Services

Updated periodically

State Permits: CA COUNTY The San Diego County Depart. Of Environmental Health

Phone:(619) 338-2211

San Bernardino County Fire Department

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

Updated quarterly/when available

State Other: US DOJ U.S. Department of Justice

Updated when available

**APPENDIX F
USER PROVIDED INFORMATION**

**ASTM E1597-05
USER SPECIFIC QUESTIONNAIRE**

Project Number / Name: ACR-71269 / Akita Nursery (Kawamura)

Project Address: 32250 Shirley Road, Valley Center, CA / APN 128-440-01

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,

COUNTY OF SAN DIEGO REQUIREMENTS

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

PURCHASE

(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),

PHI + SOILS TESTING

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

BUYER & AFFILIATES & COUNTY OF SD DRU

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

PROVIDED

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

No

(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 Rillings / Accretive

Address:

12275 El Camino Real

Signature:

Jon Rillings

Date:

3/29/11

**APPENDIX G
PHOTOGRAPHIC LOG**



Photograph 1 – View of the subject property looking southeast. View is from the southwest corner of the site.



Photograph 2 – View of the subject property looking south. View is from the northern property boundary.



Photograph 3 – View of a greenhouse located on the east-central portion of the site.



Photograph 4 – View of additional greenhouses located on the east-central portion of the site.



Photograph 5 – View of the pond located on the southern portion of the site.



Photograph 6 – View of the dam located on the southern end of the pond.



Photograph 7 – View of the maintenance shed located within the central portion of the site.



Photograph 8 – View of the used motor oil container and batteries located within the maintenance shed.



Photograph 9 – View of the debris, irrigation fittings, and pots located along the central portion of the site.



Photograph 10 – Interior contents of the shed located along the northeast portion of the subject property.

APPENDIX H
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

08 April 2011

Brian Brennan
EEI - Carlsbad
2195 Faraday Ave., Ste K
Carlsbad, CA 92008
RE: Akita Nursery (Kawamura)

Enclosed are the results of analyses for samples received by the laboratory on 04/01/11 10:55. 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

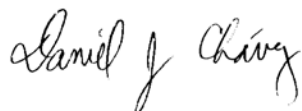
Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
ACR-1	T110373-01	Soil	03/31/11 10:53	04/01/11 10:55
ACR-2	T110373-02	Soil	03/31/11 10:51	04/01/11 10:55
ACR-3	T110373-03	Soil	03/31/11 10:56	04/01/11 10:55
ACR-4	T110373-04	Soil	03/31/11 10:48	04/01/11 10:55
ACR-5	T110373-05	Soil	03/31/11 10:46	04/01/11 10:55
ACR-6	T110373-06	Soil	03/31/11 10:40	04/01/11 10:55
ACR-7	T110373-07	Soil	03/31/11 10:34	04/01/11 10:55
ACR-8	T110373-08	Soil	03/31/11 10:33	04/01/11 10:55
ACR-9	T110373-09	Soil	03/31/11 10:22	04/01/11 10:55
ACR-10	T110373-10	Soil	03/31/11 10:08	04/01/11 10:55
ACR-11	T110373-11	Soil	03/31/11 10:19	04/01/11 10:55
ACR-12	T110373-12	Soil	03/31/11 10:06	04/01/11 10:55
Composite #1	T110373-13	Soil	03/31/11 00:00	04/01/11 10:55
Composite #2	T110373-14	Soil	03/31/11 00:00	04/01/11 10:55
Composite #3	T110373-15	Soil	03/31/11 00:00	04/01/11 10:55
Composite #4	T110373-16	Soil	03/31/11 00:00	04/01/11 10:55
Composite #5	T110373-17	Soil	03/31/11 00:00	04/01/11 10:55
Composite #6	T110373-18	Soil	03/31/11 00:00	04/01/11 10:55

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



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Lake Forest, California 92630
949.297.5020 Phone
949.297.5027 Fax

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

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-1
T110373-01 (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	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

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: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-2
T110373-02 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
---------	--------	--------------------	-------	----------	-------	----------	----------	--------	-------

SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

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



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Lake Forest, California 92630
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EEI - Carlsbad
2195 Faraday Ave., Ste K
Carlsbad CA, 92008

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-3
T110373-03 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
---------	--------	--------------------	-------	----------	-------	----------	----------	--------	-------

SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

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



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

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-4
T110373-04 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
---------	--------	--------------------	-------	----------	-------	----------	----------	--------	-------

SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	"	"	

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



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

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-5
T110373-05 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
---------	--------	--------------------	-------	----------	-------	----------	----------	--------	-------

SunStar Laboratories, Inc.

Metals by EPA 6010B

Arsenic	ND	5.0	mg/kg	1	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

SunStar Laboratories, Inc.

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Daniel Chavez, Project Manager



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Lake Forest, California 92630
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EEI - Carlsbad
2195 Faraday Ave., Ste K
Carlsbad CA, 92008

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-6
T110373-06 (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	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

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: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-7
T110373-07 (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	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

SunStar Laboratories, Inc.

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Daniel Chavez, Project Manager



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Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-8
T110373-08 (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	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	8.6	3.0	"	"	"	"	04/05/11	"	

SunStar Laboratories, Inc.

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Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-9
T110373-09 (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	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

SunStar Laboratories, Inc.

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Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-10
T110373-10 (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	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

SunStar Laboratories, Inc.

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Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-11
T110373-11 (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	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

SunStar Laboratories, Inc.

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Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

ACR-12
T110373-12 (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	1040405	04/04/11	04/05/11	EPA 6010B	
Lead	ND	3.0	"	"	"	"	04/05/11	"	

SunStar Laboratories, Inc.

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Daniel Chavez, Project Manager

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

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

**Composite #1
T110373-13 (Soil)**

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

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1040410	04/04/11	04/05/11	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

81.1 %

35-140

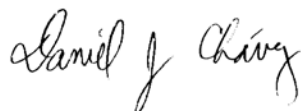
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SunStar Laboratories, Inc.



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Daniel Chavez, Project Manager

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

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

**Composite #2
T110373-14 (Soil)**

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

Organochlorine Pesticides by EPA Method 8081A

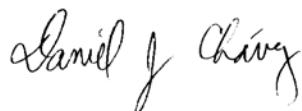
alpha-BHC	ND	5.0	ug/kg	1	1040410	04/04/11	04/06/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	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

81.8 % 35-140

" " " "

SunStar Laboratories, Inc.



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Daniel Chavez, Project Manager

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

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

Composite #3
T110373-15 (Soil)

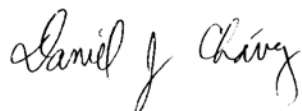
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1040410	04/04/11	04/06/11	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		73.3 %	35-140		"	"	"	"	

SunStar Laboratories, Inc.



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Daniel Chavez, Project Manager

EEI - Carlsbad
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Carlsbad CA, 92008

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

**Composite #4
T110373-16 (Soil)**

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

Organochlorine Pesticides by EPA Method 8081A

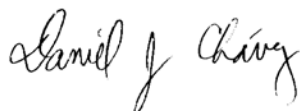
alpha-BHC	ND	5.0	ug/kg	1	1040410	04/04/11	04/06/11	EPA 8081A	
gamma-BHC (Lindane)	ND	5.0	"	"	"	"	"	"	
beta-BHC	ND	5.0	"	"	"	"	"	"	
delta-BHC	ND	5.0	"	"	"	"	"	"	
Heptachlor	ND	5.0	"	"	"	"	"	"	
Aldrin	ND	5.0	"	"	"	"	"	"	
Heptachlor epoxide	ND	5.0	"	"	"	"	"	"	
gamma-Chlordane	ND	5.0	"	"	"	"	"	"	
alpha-Chlordane	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

75.8 % 35-140

" " " "

SunStar Laboratories, Inc.



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Daniel Chavez, Project Manager

EEI - Carlsbad
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Carlsbad CA, 92008

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

**Composite #5
T110373-17 (Soil)**

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

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1040410	04/04/11	04/06/11	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	5.3	5.0	"	"	"	"	"	"
alpha-Chlordane	16	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

76.7 %

35-140

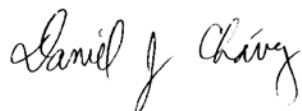
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Daniel Chavez, Project Manager

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

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

**Composite #6
T110373-18 (Soil)**

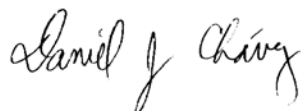
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Organochlorine Pesticides by EPA Method 8081A

alpha-BHC	ND	5.0	ug/kg	1	1040410	04/04/11	04/06/11	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		81.3 %	35-140		"	"	"	"	

SunStar Laboratories, Inc.



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Daniel Chavez, Project Manager



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Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

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 1040405 - EPA 3051

Blank (1040405-BLK1)

Prepared: 04/04/11 Analyzed: 04/05/11

Arsenic	ND	5.0	mg/kg							
Lead	ND	3.0	"							

LCS (1040405-BS1)

Prepared: 04/04/11 Analyzed: 04/05/11

Arsenic	107	5.0	mg/kg	100		107	75-125			
Lead	106	3.0	"	100		106	75-125			

Matrix Spike (1040405-MS1)

Source: T110373-01

Prepared: 04/04/11 Analyzed: 04/05/11

Arsenic	101	5.0	mg/kg	100	ND	101	75-125			
Lead	105	3.0	"	100	ND	105	75-125			

Matrix Spike Dup (1040405-MSD1)

Source: T110373-01

Prepared: 04/04/11 Analyzed: 04/05/11

Arsenic	103	5.0	mg/kg	100	ND	103	75-125	1.86	20	
Lead	106	3.0	"	100	ND	106	75-125	0.691	20	

SunStar Laboratories, Inc.

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Daniel Chavez, Project Manager

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

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

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 1040410 - EPA 3550 ECD/GCMS

Blank (1040410-BLK1)

Prepared: 04/04/11 Analyzed: 04/05/11

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 55.1 " 100 55.1 35-140

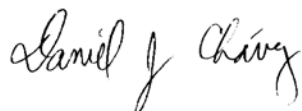
LCS (1040410-BS1)

Prepared: 04/04/11 Analyzed: 04/05/11

gamma-BHC (Lindane)	150	5.0	ug/kg	200		75.0	40-120
Heptachlor	154	5.0	"	200		76.8	40-120
Aldrin	153	5.0	"	200		76.3	40-120
Dieldrin	156	5.0	"	200		77.9	40-120
Endrin	153	5.0	"	200		76.4	40-120
4,4'-DDT	148	5.0	"	200		73.8	33-147

Surrogate: Tetrachloro-meta-xylene 80.6 " 100 80.6 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

EEI - Carlsbad

2195 Faraday Ave., Ste K
Carlsbad CA, 92008

Project: Akita Nursery (Kawamura)

Project Number: ACR-71269

Project Manager: Brian Brennan

Reported:

04/08/11 11:30

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

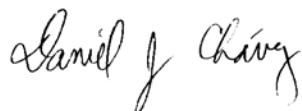
Batch 1040410 - EPA 3550 ECD/GCMS

LCS Dup (1040410-BSD1)

Prepared: 04/04/11 Analyzed: 04/05/11

gamma-BHC (Lindane)	154	5.0	ug/kg	200		76.8	40-120	2.37	30	
Heptachlor	157	5.0	"	200		78.3	40-120	1.97	30	
Aldrin	157	5.0	"	200		78.3	40-120	2.59	30	
Dieldrin	158	5.0	"	200		79.1	40-120	1.52	30	
Endrin	150	5.0	"	200		74.8	40-120	2.01	30	
4,4'-DDT	153	5.0	"	200		76.6	33-147	3.70	30	
Surrogate: Tetrachloro-meta-xylene	92.4		"	100		92.4	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

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

Project: Akita Nursery (Kawamura)
Project Number: ACR-71269
Project Manager: Brian Brennan

Reported:
04/08/11 11:30

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.

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



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

DATE: **3-31-11**

PROJECT NAME: **Akita Nursery (Kawamura)**

PROJECT LOCATION: **32250 Shirey Road, Valley Center, CA**

EI PROJECT MANAGER: **Brian R. Brennan**

Electronic Data Format (EDF): Yes ☒ No ☐

Global ID: **7110373**

EMAIL RESULTS TO: **brennan@eetiger.com**

SPECIAL INSTRUCTIONS/NOTES: Create composite samples (Composite #1 through Composite #6) from the attached sample matrix sheet. All composite samples require Organochlorine Pesticide analysis by USEPA 8081A.

6-3

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
01	ACR-1	3-31-11	1053	Soil	Glass Jar							X	X				1
02	ACR-2		1051	Soil	Glass Jar							X	X				1
03	ACR-3		1056	Soil	Glass Jar							X	X				1
04	ACR-4		1048	Soil	Glass Jar							X	X				1
05	ACR-5		1046	Soil	Glass Jar							X	X				1
06	ACR-6		1040	Soil	Glass Jar							X	X				1
07	ACR-7		1034	Soil	Glass Jar							X	X				1
08	ACR-8		1033	Soil	Glass Jar							X	X				1
09	ACR-9		1022	Soil	Glass Jar							X	X				1
10	ACR-10		1008	Soil	Glass Jar							X	X				1
11	ACR-11		1019	Soil	Glass Jar							X	X				1
12	ACR-12		1006	Soil	Glass Jar							X	X				1
13	Composite #1			Soil	Glass Jar									X			1
14	Composite #2			Soil	Glass Jar									X			1
15	Composite #3			Soil	Glass Jar									X			1
16	Composite #4			Soil	Glass Jar									X			1
17	Composite #5			Soil	Glass Jar									X			1
18	Composite #6			Soil	Glass Jar									X			1

Retrieved By (signature):

Date/Time: **3-31-11**

Retrieved By (signature):

Date/Time: **3-31-11**

Received By (signature):

Date/Time: **4/1/11**

Received By (signature):

Date/Time: **10:55**

EEI	ACR-71269
Discrete Sample IDs	Composite Sample IDs
ACR-1	Composite #1
ACR-2	
ACR-3	Composite #2
ACR-4	
ACR-5	Composite #3
ACR-6	
ACR-7	Composite #4
ACR-8	
ACR-9	Composite #5
ACR-10	
ACR-11	Composite #6
ACR-12	

T110373

SAMPLE RECEIVING REVIEW SHEET

BATCH # T110373

Client Name: EEL - CARLSBAD

Project: 32250 SHIRLEY ROAD, VALLEY CENTER
CA

Received by: DAN

Date/Time Received: 4/1/11 10:55

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 6.5 °C +/- the CF (-0.2°C) = 6.3 °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 BC 4/1/11

Comments:



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

**Accretive Investments, Inc.
“Denova” Property
16.71-Acre Property
APN 128-280-46
SEC of Shirey Road and West Lilac Road
Escondido, California 92026**

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

**May 3, 2011
(March 26, 2012 revisions)**

EEI Project Number ACR-71271.1

**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

Site location:

“Denova” Property
16.71-Acre Property
APN 128-280-46
SEC of Shirey Road and West Lilac Road
Escondido, California 92026

Prepared and Edited by:



Brian R. Brennan, REA-II
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-71271

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- Appendix A – Résumé of Environmental Professional
- Appendix B – San Diego County Assessor’s Parcel Map
- Appendix C – Aerial Photographs/Topographic Maps
- Appendix D – Environmental Records Search
- Appendix E – User Provided Information
- Appendix F – Photographic Log
- Appendix G – Limited Agricultural Chemical Survey Laboratory Report and Chain of Custody

GENERAL SITE INFORMATION

Project Information: 16.71-Acre Property

EEI Project Number: ACR-71271

Site Information:

“Denova” Property
16.71-Acre Property
APN 128-280-46
SEC of Shirey Road and West Lilac Road
Escondido, County of San Diego, California 92026

Site Access Contact: Mr. Jon Rilling, Accretive Investments, Inc. (858-345-3644)
and Mrs. Flora Denova, 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: April 7, 2011 / **Report Date:** May 3, 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 – 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 – 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 – 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 the southeast corner of Shirey Road and 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 irregular-shaped subject property consists of privately owned land located southeast of the intersection of Shirey Road and West Lilac Road, Escondido, Unincorporated Community of San Diego County, California. The subject property encompasses a total of 16.71-acres on one parcel identified as Assessor’s Parcel Number (APN) 128-280-46. There is no physical address associated with the subject property.

Access to the subject property can be obtained from immediately south of West Lilac Road, east of Shirey Road, and along a segment of Putnam Road located on the eastern property boundary. The subject property is currently undeveloped and comprised of gently sloping terrain, and native vegetation. The subject property is bound by West Lilac Road to the north and a rural residence beyond; agricultural land to the south; a fire station and rural residence to the east; and Shirey Road to the west and agricultural land beyond. A drainage was observed on the subject property, which bisected the site from the north-central to the southwest. Standing water was observed along the southwest portion of the drainage and along Shirey Road.

Based on historical records such as aerial photographs, topographic maps, and County records, the subject property has remained undeveloped since 1939.

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 April 7, 2011, EEI personnel conducted a reconnaissance of the property to physically observe the site 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. Due to the dense vegetation covering the subject property, vantage points were utilized to evaluate the physical condition of the subject property. No evidence of *recognized environmental conditions* was noted on the subject property during our site reconnaissance efforts.

Based on the proposed future planned residential site use, the County of San Diego required the user of this Phase I ESA (i.e., Accretive Investments, Inc.) to conduct an evaluation of site soils for the presence of restricted agricultural chemicals, prior to redevelopment. Therefore, EEI performed a limited agricultural chemical survey at the subject property. Sampling activities were conducted on April 12, 2011. A total of six (6) discrete soil samples (ACR-1 through ACR-6), collected at 6-inches below ground surface were analyzed for Arsenic and Lead by EPA Test Method 6010B and Organochlorine Pesticides by EPA Method 8081A.

No concentrations of arsenic were detected above the laboratory reporting limit (i.e., “non-detect”). Lead was detected in three samples and ranged from 3.9 mg/kg (ACR-1) to 8.2 mg/kg (ACR-5). No other samples analyzed detected lead above the laboratory reporting limit (i.e., “non-detect”). DDE and DDT (organochlorine pesticides) were detected in sample ACR-4 at 9.4 micrograms per kilogram ($\mu\text{g/kg}$) and 6.5 $\mu\text{g/kg}$, respectively. No other samples analyzed detected DDE, DDT, or any other organochlorine pesticide included in EPA Test Method 8081A above the laboratory reporting limit (i.e., “non-detect”).

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 southeast of the intersection of Shirey Road and 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:

- Based on laboratory analytical results from agricultural chemical survey activities, low levels of lead and DDE and DDT (organochlorine pesticides) were detected in site soils. All detectable concentrations of lead, DDE, and DDT were less than the CHHSL residential screening level of 150 mg/kg (lead) and 1,600 $\mu\text{g/kg}$ (DDE and DDT). Therefore, no further investigation appears to be warranted at this time.

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 southeast of the intersection of West Lilac Road and Shirey 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 site.
- A review of readily available maps, aerial photographs, and other documents relative to historical subject site usage and development.
- A review of previous environmental reports and regulatory file information pertaining to both existing and historic site 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 site reconnaissance to ascertain current conditions on the subject property.
- Interviews with person(s) knowledgeable of 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 site, but rather is intended to provide a preliminary indication of onsite impacts from previous site 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 Site Description

The irregular-shaped subject property consists of privately owned land located southeast of the intersection of Shirey Road and West Lilac Road, Escondido, California (**Figure 2**). The subject property encompasses a total of 16.71-acres on one parcel identified as Assessor’s Parcel Number (APN) 128-280-46 (**Appendix B**). There is no physical address associated with the subject property.

Access to the subject property can be obtained from immediately south of West Lilac Road, east of Shirey Road, and along a segment of Putnam Road located on the eastern property boundary. The subject property is currently undeveloped and comprised of gently sloping terrain, and native vegetation. The subject property is bound by West Lilac Road to the north and a rural residence beyond; agricultural land to the south; a fire station and rural residence to the east; and Shirey Road to the west and agricultural land beyond. A drainage was observed on the subject property, which bisected the site from the north-central to the southwest. Standing water was observed along the southwest portion of the drainage and along Shirey Road. Due to the dense vegetation covering the subject property, vantage points were utilized to evaluate the physical condition of the subject property.

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 has remained undeveloped since 1939.

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. The approximate site elevation ranges from approximately 800 feet above mean sea level (amsl) (southwestern portion) to approximately 900 feet amsl (northeast portion).

2.3 Regional and Local Geology

The subject site 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 site is underlain by Mesozoic aged (Cretaceous-age) granitic rocks (USGS, 2000). Specifically, the site 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 site and in the vicinity of the site have been identified by the United States Department of Agriculture – Natural Resources Conservation Service, Web Soil Survey as the Fallbrook sandy loam series (FaE2), Greenfield sandy loam series (CIG2), and the Steep Gullied Land series (StG) (USDA, 2011). 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 site 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 more information. According to the website, a water well exists along the eastern-central portion of the site. Well “10S02W19D001S” was reportedly last measured in 1967 with a depth of groundwater approximately 108 feet below grade. It should be noted that the well was not observed during our site reconnaissance; therefore, may be associated with the fire station located immediately north of the plotted well location, or the rural residence located immediately south of the plotted well location. Furthermore, the County of San Diego Land and Water Quality Division have no records of a well being located on 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 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, 2011) 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 SITE BACKGROUND

3.1 Site Ownership

According to the County of San Diego Assessor the current owner of the subject parcel is identified as Laura Denova Trust with a mailing address of 5650 Genoa Drive, San Diego, California 92120.

3.2 Site History

EEI reviewed readily available information sources to evaluate historic land use in and around the subject site. 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 1939, 1942, 1946, 1948, 1949, 1951, 1953, 1963, 1968, 1974, 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 aerial photograph and historical topographic map review. Copies of the aerial photographs and historical topographic maps provided by Track Info Services/FirstSearch® are included in **Appendix C**. Based on the data reviewed, the subject property has remained undeveloped since 1939.

TABLE 1 Summary of Historical Use Review		
Year	Source and Scale	Comments
1939	Aerial Photograph 1:375	Subject property appeared to be undeveloped and covered with native vegetation. A small portion of the northwest corner of the site appeared to be cleared as part of a rural residence. A drainage bisected the site from the north-central portion of the site to the southwest corner of the property. An unimproved road was visible immediately north of the subject property. The surrounding area appeared to be undeveloped and covered with native vegetation.
1942	Topographic Map 1:62,500	Subject property appeared to be undeveloped. West Lilac Road was present to the north. The surrounding area appeared to be undeveloped land.
1946	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1939 photograph, except for an unimproved dirt road bisected the north-central portion of the site.
1948	Topographic Map 1:24,000	No apparent changes were noted to the subject property since the 1942 topographic map.
1949	Topographic Map 1:25,000	No apparent changes were noted to the subject property since the 1948 topographic map.
1951	Topographic Map 1:25,000	No apparent changes were noted to the subject property since the 1949 topographic map, except for the subject property and surrounding area were shaded green, which signified agricultural-related land use.
1953	Aerial Photograph 1:375	Subject property appeared to be undeveloped. An unimproved road, presumably Shirey Road, was present along the western property boundary. Additional unimproved dirt roads were visible along the northwest corner of the site.
1963	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1953 aerial photograph. A clearing was noted offsite and east of the northeast corner of the site. Rural residences and agricultural-related land use were visible in the surrounding area. Shirey Road was visible along the western property boundary, while West Lilac Road, located north of the site appeared to be improved.
1968	Topographic Map 1: 24,000	No apparent changes were noted to the subject property since the 1951 topographic map.
1974	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1963 aerial photograph. Increased agricultural-related land use and rural residences were noted in the surrounding area.
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.
1990-1991	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1980 aerial photograph. Increased agricultural-related land use was noted in the surrounding area.

TABLE 1 Summary of Historical Use Review		
Year	Source and Scale	Comments
2002	Aerial Photograph 1:375	No apparent changes were noted to the subject property since the 1990/1991 aerial photograph. Increased agricultural-related land use was noted in the surrounding area.
March 2012	Aerial Photograph <u>Accretive Investments, Inc.</u>	The subject property appeared as its current configuration, which consisted of undeveloped land covered with native vegetation. A drainage bisected the site from the north-central portion of the site to the southwest corner of the property. West Lilac Road was present along the north property boundary and Shirey Road was present along the western property boundary. No other pertinent information or environmental issues were noted.

3.2.2 City/County Directory

The subject property does not have a physical address; therefore, a city/county directory search was not performed as part of this investigation.

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) website to review any existing records related to development of the subject property. According to the online database maintained by the County (LUEG, 2011), no records were on file for the subject property (APN 128-280-46).

3.3 Regulatory Database Search

EEI reviewed known electronic database listings for possible hazardous waste generating establishments in the vicinity of the subject site, 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 – No listings were reported within one mile of the subject property.

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) – One listing was reported within one-quarter mile of the subject property: **Miller Fire Station, CDF** (9127 West Lilac Road; 0.16 miles northeast). Operating permits 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 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-quarter mile of the subject property.

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

State Permits – One listing was reported within one-quarter mile of the subject property: **Miller Fire Station, CDF** (9127 West Lilac Road; 0.16 miles northeast). State permits 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 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 Ms. Liz Lozano, Administrative Assistant/Board Clerk, 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: APN 128-280-46. 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 (2011), 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 (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 site 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 T10, R03WS, Section 19).

3.5 Interview with Current Property Owner

EEI contacted the owner; Mrs. Flora Denova regarding the past and present use of the subject property. Mrs. Denova indicated that she had owned the property for approximately 25-30 years and to her knowledge it has never been cultivated or developed. Mrs. Denova referred EEI to her real estate broker, Mr. Randy Engel for additional information regarding the subject property. Information provided by Mr. Engel is summarized below.

3.5.1 Past or Present Uses Indicating Environmental Concern

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

3.5.2 Environmental Liens or Governmental Notification

Mr. Engel 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

Mr. Engel 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

Mr. Engel was not aware of any previous assessments conducted at the subject property.

3.5.5 Legal Proceedings

Mr. Engel 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 and representative, Mrs. Denova and Mr. Engel, respectively, 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.

No structures were observed on the subject property during our site reconnaissance. Therefore, the presence of ACM is unlikely.

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.

No structures were observed on the subject property during our site reconnaissance. Therefore, the presence of LBP is unlikely.

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).

No structures, pole-mounted transformers, or pad-mounted transformers were observed on the subject property during our site reconnaissance. Therefore, the presence of PCB-containing equipment is unlikely.

4.0 SITE RECONNAISSANCE

4.1 Purpose

The purpose of our site 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, above ground storage tanks (ASTs), USTs, illegal dumping, or improper waste storage/handling. Detailed information is provided in the text below.

4.2 Subject Site

On April 7, 2011, EEI personnel mobilized to the subject property and conducted a site reconnaissance of the subject property. Due to the dense vegetation on the subject property, our reconnaissance was limited to vantage point views of the site. Visual conditions observed during the site reconnaissance of the subject property, are documented in a Photographic Log (**Appendix F**), and summarized in **Table 2**.

The irregular-shaped subject property consists of privately owned land located southeast of the intersection of Shirey Road and West Lilac Road, Escondido, Unincorporated Community of San Diego County, California (**Figure 2**). The subject property encompasses a total of 16.71-acres on one parcel identified as Assessor's Parcel Number (APN) 128-280-46. There is no physical address associated with the subject property.

Access to the subject property was obtained from immediately south of West Lilac Road, east of Shirey Road, and along a segment of Putnam Road located on the eastern property boundary. The subject property is currently undeveloped and comprised of gently sloping terrain, and native vegetation. The subject property is bound by West Lilac Road to the north and a rural residence beyond; agricultural land to the south; a fire station and rural residence to the east; and Shirey Road to the west and agricultural land beyond. A drainage was observed on the subject property, which bisected the site from the north-central to the southwest. Standing water was observed along the southwest portion of the drainage and along Shirey Road.

EEI personnel conducted a reconnaissance of the property to physically observe the site 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 site reconnaissance efforts.

TABLE 2 Summary of Site Reconnaissance		
Item	Concerns	Comments
General Housekeeping	No	Good. No concerns observed.
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	A drainage was observed on the subject property, which bisected the site from the north-central to the southwest. Standing water was observed along the southwest portion of the drainage and along Shirey Road.
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	None 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 vacant/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

5.1 Purpose and Objective

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, and EEI’s experience at similar sites, a total of 6 discrete soil samples, or approximately one per acre, were collected at near-surface (6-inches below grade) locations on the subject property. Note: due to the dense vegetation covering the subject property, our sampling was limited to reasonably accessible areas. The following sections discuss our investigation activities.

5.2 Field Investigation

On April 12, 2011, EEI personnel mobilized to the project site 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.

5.3 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 (USEPA) 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 were detected above the laboratory reporting limit (i.e., “non-detect”).
- Lead was detected above the laboratory detection limit in samples ACR-1, ACR-4, and ACR-5. Concentrations of lead ranged from 3.9 milligrams per kilogram (mg/kg) (ACR-1) to 8.2 mg/kg (ACR-5). No other samples analyzed detected lead above the laboratory reporting limit (i.e., “non-detect”).

- DDE and DDT (organochlorine pesticides) were detected in sample ACR-4 at 9.4 micrograms per kilogram ($\mu\text{g/kg}$) and 6.5 $\mu\text{g/kg}$, respectively. No other samples analyzed detected DDE, DDT, or any other organochlorine pesticide included in EPA Test Method 8081A above the laboratory reporting limit (i.e., “non-detect”).

The attached **Table 3** summarizes laboratory analytical results. Complete laboratory reports and COC documentation are provided in **Appendix G**.

TABLE 3 Soil Sample Results									
Sample ID	Depth (inches bgs)	Date Sampled	EPA 6010B			EPA 8081A			
			Arsenic	Lead	Dieldri n	DDE	DDD	DDT	All Other Constituents
			Reported in mg/kg		Reported in µg/kg				
ACR-1	6	4/12/2011	<5	3.9	<5	<5	<5	<5	<5-200
ACR-2	6	4/12/2011	<5	<3	<5	<5	<5	<5	<5-200
ACR-3	6	4/12/2011	<5	<3	<5	<5	<5	<5	<5-200
ACR-4	6	4/12/2011	<5	5.7	<5	9.4	<5	6.5	<5-200
ACR-5	6	4/12/2011	<5	8.2	<5	<5	<5	<5	<5-200
ACR-6	6	4/12/2011	<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	5-200
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.									

5.4 Discussion of Testing Results

No concentrations of arsenic were detected above the laboratory reporting limit (i.e., “non-detect”) in the samples analyzed during this investigation. Lead was detected above the laboratory detection limit in samples ACR-1, ACR-4, and ACR-5. Concentrations of lead ranged from 3.9 mg/kg (ACR-1) to 8.2 mg/kg (ACR-5). No other samples analyzed detected lead above the laboratory reporting limit (i.e., “non-detect”).

DDE and DDT (organochlorine pesticides) were detected in sample ACR-4 at 9.4 $\mu\text{g/kg}$ and 6.5 $\mu\text{g/kg}$, respectively. DDE and DDT (organochlorine pesticides) were detected in sample ACR-4 at 9.4 micrograms per kilogram ($\mu\text{g/kg}$) and 6.5 $\mu\text{g/kg}$, respectively. No other samples analyzed detected DDE, DDT, or any other organochlorine pesticide included in EPA Test Method 8081A above the laboratory reporting limit (i.e., “non-detect”).

EEI compared the reported lead and DDE and DDT values to the California Human Health Screening Levels (CHHSL) residential land use scenario values. 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 ranging from 3.9 mg/kg to 8.2 mg/kg is less than the CHHSL residential screening level of 150 mg/kg. Furthermore, the lead concentration appears to represent background levels inherent to site soils (Kearney Foundation Special Report, 1996).
- The detected DDE and DDT concentrations of 9.4 µg/kg and 6.5 µg/kg, respectively is less than the CHHSL residential screening level of 1,600 µg/kg for both compounds.

Although arsenic was not detected above the laboratory reporting limit of 5 milligrams per kilogram (mg/kg) in any of the samples analyzed during this investigation, it should be noted that the residential CHHSL value for arsenic is 0.07 mg/kg, which is less than the laboratory reporting limit. Arsenic is a natural occurring element that is present in soil. Acceptable background levels for naturally occurring arsenic vary. The DTSC evaluated arsenic soil concentration data collected from various school sites and determined that 12 mg/kg is an acceptable background screening level (DTSC, 2008). If concentrations of arsenic are detected above 12 mg/kg, the DTSC suggests further evaluation.

6.0 PHASE I FINDINGS AND OPINIONS

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

- Known or suspected RECs – No known or suspected RECs have been revealed during the preparation of this ESA. However, based on the proposed future planned residential site use, the County of San Diego required the user of this Phase I ESA (i.e., Accretive Investments, Inc.) to conduct an evaluation of site soils for the presence of restricted agricultural chemicals. Therefore, EEI performed a limited agricultural chemical survey at the subject property. Note: due to the dense vegetation covering the subject property, our sampling was limited to reasonably accessible areas.

Based on the results of our agricultural chemical survey (see Section 8.0 – Results of Limited Agricultural Survey), no concentrations of arsenic were detected above the laboratory reporting limit (i.e., non-detect). Low levels of lead, and organochlorine pesticides DDE and DDT were detected in site soils. The concentrations were less than applicable residential screening levels; 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 southeast of the intersection of Shirey Road and 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:

- Based on laboratory analytical results from agricultural chemical survey activities, low levels of lead and DDE and DDT (organochlorine pesticides) were detected in site soils. All detectable concentrations of lead, DDE, and DDT were less than the CHHSL residential screening level of 150 mg/kg (lead) and 1,600 µg/kg (DDE and DDT). Therefore, no further investigation appears to be warranted at this time.

9.0 REFERENCES

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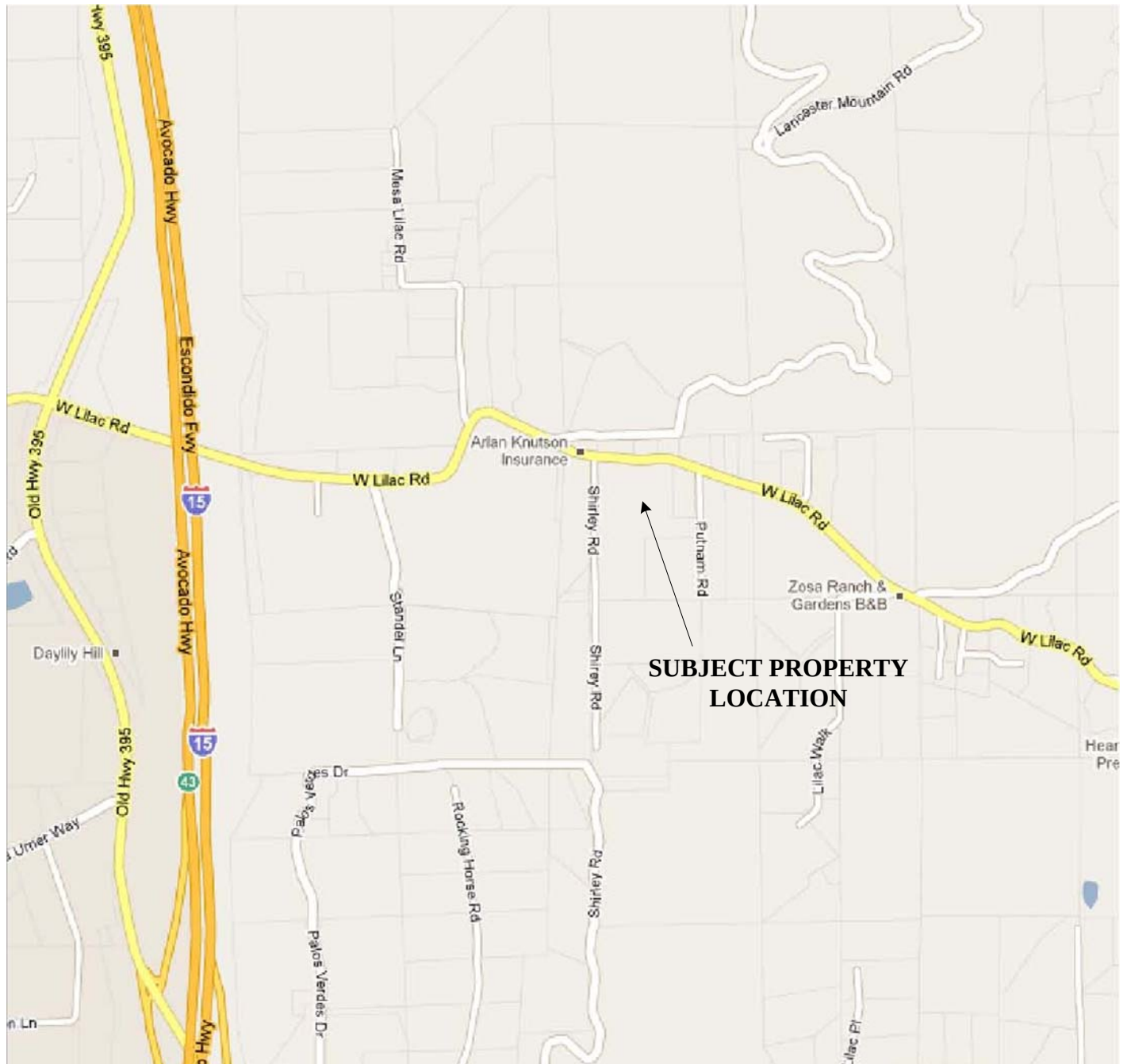
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United States Department of Agriculture (USDA), Natural Resources Conservation Service, Website (<http://websoilsurvey.nrcs.usda.gov/app/>) Web Soil Survey, accessed March 2011.

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

FIGURES



Map Source: Google Maps®, Accessed, March 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.

"Denova" Property (16.71-acres)

APN 128-4280-46

SEC of Shirey Road and West Lilac Road,

Escondido, California 92026

EEI Project No. ACR-71271

Created April 2011



FIGURE 1



Map Source: Accretive Investments, Inc., March 2012



Scale: 1" = 200'



Note All Locations Are Approximate

AERIAL SITE MAP
 ACCRETIVE INVESTMENTS, INC.
 "Denova Property" (16.71-Acres)
 APN: 128-280-46
 Escondido, California 92026
 EEI Project No. ACR-71271
 Revised March 2012



FIGURE 2



Map Source: Accretive Investments, Inc., March 2012

LEGEND



Soil Boring Location



Scale: 1" = 200'



Note All Locations Are Approximate

SOIL BORING LOCATION MAP

ACCRETIVE INVESTMENTS, INC.

"Denova Property" (16.71-Acres)

APN: 128-280-46

Escondido, California 92026

EEI Project No. ACR-71271

Revised 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)

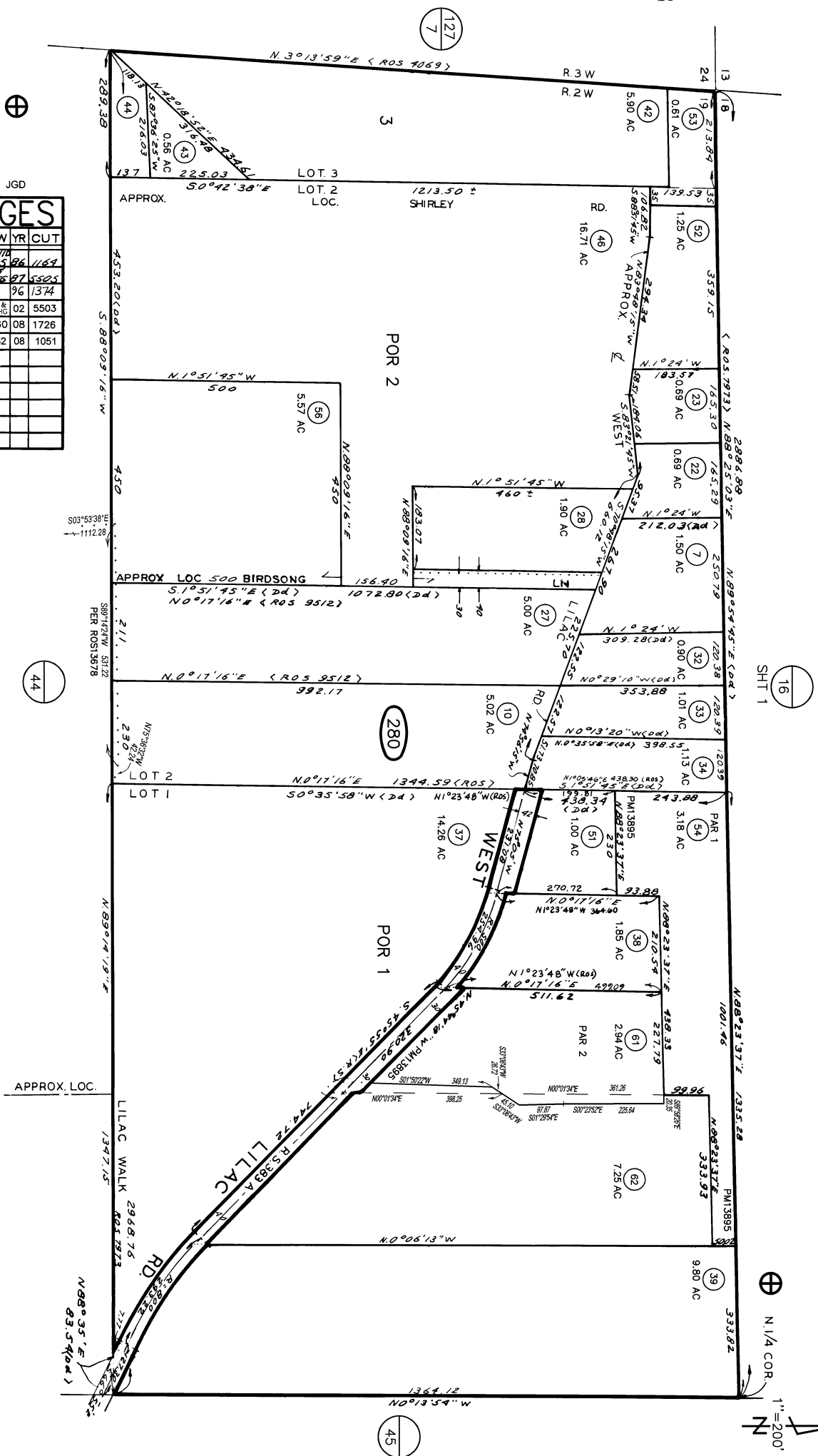
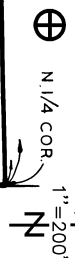
San Diego Environmental Professionals (SDEP)

Certifications

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

AHERA Asbestos Building Inspector

APPENDIX B
SAN DIEGO COUNTY ASSESSOR’S PARCEL MAP



VAN BEEK
6-16-86

SEC 19-T10S-R2W-N 1/2 OF NW 1/4
R0S 4069, 7973, 9512, 10932

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



Environmental FirstSearch

Historical Aerial Photo

2002

Shirey Road, Escondido, CA 92026



Job Number: ACR_712711
Target Site: 33.298433, 117.137382

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1990-1991

Shirey Road, Escondido, CA 92026



Job Number: ACR_712711
Target Site: 33.298433, 117.137382

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1980

Shirey Road, Escondido, CA 92026



Job Number: ACR_712711
Target Site: 33.298433, 117.137382

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1974

Shirey Road, Escondido, CA 92026



Job Number: ACR_712711
Target Site: 33.298433, 117.137382

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1963

Shirey Road, Escondido, CA 92026



Job Number: ACR_712711
Target Site: 33.298433, 117.137382

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1953

Shirey Road, Escondido, CA 92026



Job Number: ACR_712711
Target Site: 33.298433, 117.137382

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1946

Shirey Road, Escondido, CA 92026



Job Number: ACR_712711
Target Site: 33.298433, 117.137382

Approximate Scale: 1 in equals 375 ft



Environmental FirstSearch

Historical Aerial Photo

1939

Shirey Road, Escondido, CA 92026



Job Number: ACR_712711
Target Site: 33.298433, 117.137382

Approximate Scale: 1 in equals 375 ft