

PHASE I ENVIRONMENTAL
SITE ASSESSMENT
MOORE PROPERTY
INTERSTATE 5 AND DEL PASO BOULEVARD
SACRAMENTO, CALIFORNIA

September 11, 1998

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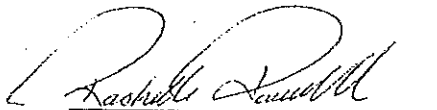
A Report Prepared for:

Mr. Bill Scott
The Cambay, Inc.
1350 Treat Boulevard, #560
Walnut Creek, CA 94596

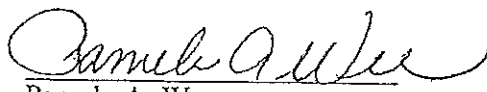
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SACRAMENTO, CA**

Kleinfelder Job No: 23-483659

Prepared by:


Rachelle Rounsavill
Environmental Scientist

Reviewed by:


Pamela A. Wee
Senior Program Manager

KLEINFELDER, INC.
3077 Fite Circle
Sacramento, CA 95827
(916) 366-1701

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1. SUMMARY

A Phase I Environmental Site Assessment (ESA) was conducted for The Cambay, Inc. at the Moore Property in Sacramento, California in Sacramento County. The vacant agricultural lot is located west of Interstate 5 and south of Del Paso Road. In summary, Kleinfelder's assessment did not reveal environmental conditions that may have affected the subject site.

Findings of Kleinfelder, Inc.'s assessment are discussed in greater detail in Chapter 7 of this report. This report is subject to the limitations in Chapter 8. Any party other than the Client who would like to use this report shall notify Kleinfelder, Inc. of such intended use by executing the "Application for Authorization to Use" contained in Appendix E of this document.

2. INTRODUCTION

The purpose of this assessment is to assist the client in evaluating recognized environmental conditions at the site. A recognized environmental condition is defined by the ASTM standard as "the presence or likely presence of hazardous substances or petroleum products under conditions that indicate a release into structures on the property or into the ground, groundwater or surface water of the property". Kleinfelder performed this ESA in accordance with the scope and limitations of the American Society of Testing and Materials (ASTM); Standard Practice for Phase I Environmental Site Assessment Process E1527-97, and our authorized proposal and contract 23-YP6049 dated August 6, 1998.

The subject property is hereafter referred to as the "site".

Resumes of environmental professionals conducting this site assessment are on file at Kleinfelder's office and are available upon request.

2.1 REPORT FORMAT

The following sections describe Kleinfelder's work scope:

- Chapter 3, **Site Setting**, is a compilation of information concerning the site's location, physical setting, and geologic and hydrogeologic conditions.
- Chapter 4, **Records Review**, is a compilation of Kleinfelder's review of several databases available from the Federal, State, and local regulatory agencies regarding hazardous substance use, storage, or disposal at the subject site; and for off-site facilities up to a mile radius from the site. This chapter includes interviews and telephone conversations conducted by Kleinfelder with people knowledgeable about the site and local regulatory personnel.
- Chapter 5, **History of the Site**, summarizes the history of the site and adjoining properties based on various sources which may include a review of aerial photographs, city or suburban directories, historical maps, and information provided to Kleinfelder by the client, such as a chain-of-title, and preliminary title report.

- Chapter 6, **Site Reconnaissance**, describes Kleinfelder's site observations during the site reconnaissance and observations of adjacent parcels.
- Chapter 7, **Findings and Conclusions**, is a presentation of our findings and conclusions regarding the information in Chapters 3 through 6; and presents our opinion regarding the presence of environmental conditions of concern at the site.
- Chapters 8 and 9 present our **Limitations** and **References**, respectively.

Pertinent documentation regarding the subject site is included in Appendices A, B, C, and D of this report.

3. SITE SETTING

The site setting is presented to assess the significance of potential on- and off-site contaminant migration, if present. The site location is shown on Plate 1 in Appendix A. Tables 1 through 3 provide the physical characteristics of the site and bordering properties.

The information presented in Table 1 describes the physical location of the subject site. This information was obtained from maps, public records, and interviews.

TABLE 1
SITE SETTING

ADDRESS	Interstate 5, Del Paso Blvd. and El Centro Rd. Sacramento, CA 95815
LOCATION	South of Del Paso Blvd., west of Interstate 5, and east of El Centro Road in Sacramento, California
TOWNSHIP & RANGE	Section 10 of Township 10 North and Range 4 East
ASSESSOR'S PARCEL NUMBER	Parcel 1: 225-0080-030 Parcel 2: 225-0080-031 Parcel 3: 225-0080-032 A copy of the Assessor's Parcel maps are included in Appendix B.
LEGAL DESCRIPTION	A legal description of the subject site was not provided.
ACREAGE	Parcel 1: Approximately 41.72 acres Parcel 2: Approximately 42.97 acres Parcel 3: Approximately 28.59 acres
CURRENT USE	Vacant undeveloped agricultural land
PROPOSED USE	Residential/Commercial development

Table 2 presents information about the physical setting of the site. This information was obtained from published maps.

TABLE 2
PHYSICAL SETTING

USGS TOPOGRAPHIC QUADRANGLE	Taylor Monument Quad, dated 1967 (photorevised in 1975)	The site was located at an approximate surface elevation of 15 feet above Mean Sea Level. The terrain appeared to be moderately level. Del Paso Blvd., Interstate 5 and El Centro Road were constructed to the north, east and west, respectively. A canal was depicted at the southern boundary of the site. A well was depicted adjacent to the southern boundary and approximately 2400 feet east of El Centro Road. The site was vacant with no structures or agricultural activities illustrated.
GEOLOGIC MAP	Geologic Map of California, State of California Department of Conservation 1977; Scale: 1 inch =12 miles.	The subject site lies on the north central margin of the Great Valley Geomorphic Province in north central California. Alluvium, lake, playa, and terrace deposits; unconsolidated and semi-consolidated. Mostly non-marine.
SOIL TYPE	Soil Survey of Sacramento County, California, United States Department of Agriculture, Soil Conservation Service publication, issued April 1993. (Sheet No. 1)	The subject site consists of Clear Lake clay and Cosumnes silt loam. These soils are deep to very deep and artificially drained. Groundwater overdraft has altered the drainage of the soil, and when the Clear Lake clay is dry, deep cracks form. The Clear Lake clay has a hardpan that is cemented to silica from 14 inches to a depth of 64 inches. Permeability in both soils is slow, and available water capacity is moderate to high. Water table depth is 60 to 72 inches. The Clear Lake clay shrink-swell potential is high. Both soils are suited to irrigated crops, especially rice crops. The major limitations to urban development include a high shrink-swell potential, low strength, the depth to the seasonal high water table, slow permeability, very slow runoff, flooding and sloughing (a hazard in shallow excavations).
OIL AND GAS FIELDS	Munger Map, 1997	An uncompleted, abandoned well (listed as Superior Sills '77-7881' was depicted in the southwest quarter of Section 10 of Township 10 north and Range 4 east (see map W-12)

Information about the regional geology and hydrogeology is presented on Table 3. This information was obtained from published data and maps, interviews with public agencies, and from previous investigations conducted by Kleinfelder in the vicinity of the site.

**TABLE 3
REGIONAL GEOLOGY AND HYDROGEOLOGY**

<p>REGIONAL GEOMORPHIC PROVINCE</p>	<p>The subject site lies inside the western margin of the Great Valley Geomorphic Province in Central California. This province was formed by the filling of a large structural trough or downwarp of the underlying bedrock. The trough is situated between the Sierra Nevada on the east and the Coast Ranges on the west. The trough, which underlies the valley, was asymmetrical with the greatest depths of sediments along the margin. The valley has been filled with a thick sequence of marine and non-marine sediments from the late Jurassic to Holocene periods.</p>
<p>DEPTH TO REGIONAL GROUNDWATER AND DIRECTION OF ANTICIPATED FLOW (Source: Fall 1996 map, RWQCB file review)</p>	<p>The listed depth to groundwater was at approximately 5 feet above Mean Sea Level. Therefore, based on surface elevation of approximately 15 feet above Mean Sea Level, depth to groundwater is estimated at approximately 10 feet below ground surface. The estimated direction of groundwater flow, based on the Fall 1996 map, varies from the south to southwest due to the relatively shallow gradient. General groundwater depth may be influenced by local pumping, rainfall, and irrigation patterns.</p>
<p>REGIONAL GROUNDWATER QUALITY PROBLEMS (Source: EDR report, RWQCB)</p>	<p>Regional groundwater quality may have been affected by the Natomas Airport hazardous substance release. See discussion in Section 4.2.</p>

4. RECORDS REVIEW

4.1 REGULATORY AGENCY DATABASE REVIEW

The purpose of the records review is to obtain and review records that would help to evaluate recognized environmental conditions of potential concern in connection with the subject site and bordering properties.

Federal, state and local regulatory agencies publish databases or "lists" of businesses and properties that handle hazardous materials or hazardous waste, or are the known location of a release of hazardous substances to soil and/or groundwater. These databases are available for review and/or purchase at the regulatory agencies, or the information may be obtained through a commercial database service. Kleinfelder contracted with a commercial database service, e-Data Resources (EDR), to review the regulatory agency lists for references to the site and any listings within the appropriate ASTM minimum search distance to the site. The EDR database search results are included in Appendix C, Regulatory Agency Database Summary. The federal and state databases reviewed by EDR are summarized on Table 4. In addition, Kleinfelder, Inc. reviewed the Sacramento County Master List for facilities that handled hazardous materials as reported on EDR's list of generators.

TABLE 4
RECORDS REVIEW-SEARCH DISTANCE

FEDERAL		STATE	
NPL	1-mile	Cal-Sites, BEP, AWP	1-mile
RCRA-CORRACTS TSD	1-mile	CORTESE	½-mile
CERCLIS	½-mile	LUST	½-mile
RCRA-non CORRACTS TSD	½-mile	SLIC	½-mile
RCRA-GEN	Site & bordering	SWIS	½-mile
ERNS	Site	UST	Site & bordering

In summary, the subject property was not listed in any of the databases searched by EDR. There was one off-site facility described in the EDR report within the radius listed on Table 4. Natomas Airport, located at 3801 Airport Road, Sacramento, California is listed on the Cal-Sites database. Section 4.2 discusses agency records findings.

4.2 DISCUSSION OF AGENCY RECORDS

Local regulatory agencies were contacted for reasonably ascertainable and practically reviewable information regarding recognized environmental conditions present at facilities in the area of the site. A summary of information obtained is provided on Table 5.

TABLE 5
AGENCY RECORDS SUMMARY

	AGENCY	DATE	CONTACT NAME	PHONE	TYPE OF INFORMATION
County	USDA Natural Resources Conservation District	9/2/98	Chris	(916) 682-7844	Aerial photograph review.
County	Agricultural Commissioner	9/8/98, 9/9/98	Dave Wilson	(916) 875-6603	Pesticide use and application.
County	Assessor's Office	9/2/98	Desk Clerk	(916) 874-5231	Assessor's Parcel Map (see Appendix B)
State	Department of Oil, Gas, and Geothermal Resources	8/18/98	Jennie	(916) 322-1110	A history report of oil well construction and abandonments.

Sacramento County Agricultural Commissioner

Mr. Dave Wilson was contacted regarding pesticide utilization at the subject site. According to Mr. Wilson, the predominant crops in the area are rice and sugar beets. Listed below are the general historical pesticide use for those crops:

Rice:

During the 1950's the predominant pesticides were organochlorines such as DDT and Toxaphene. The constituents were generally found in drainage areas and sediments. According to Mr. Wilson these compounds are not likely to be found in concentrations that would be of concern and were not utilized extensively on rice crops.

By the 1960's organochlorines were replaced by organophosphate pesticides such as parathion and meta-parathion. These compounds readily breakdown in sunlight and do not generally persist longer than one season. Additional compounds included copper sulfate, chlorophenoxy,

and 2,4-D. Because copper sulfate is an elemental compound it has a tendency to accumulate, but background levels of copper are generally high and therefore accumulated copper levels should not be a problem unless a large quantity spill had occurred on site. Chlorophenoxy and 2,4-D have short residual times and are not likely to pose a problem.

In the late 1970's and early 1980's Basagran (Bentazone) came into use. This constituent has been found in groundwater. It appears that it reaches groundwater via nearby water wells that are not sealed correctly. File review did not reveal water wells on the subject site.

Sugar Beets:

The predominant constituents utilized in sugar beet farming include herbicides such as cycloate, trifluralin, and oryzalin and organophosphate insecticides. According to Mr. Wilson, these constituents do not accumulate and therefore should not be a problem.

Further extensive file review can be conducted for a fee at the client's request.

California Division of Oil and Gas (DOG)

The DOG had records of the abandoned oil well on site. The Superior Oil Company drilled and abandoned a well in April 1977. Reports of well abandonment have been filed for the oil well. It should be noted that the DOG has requirements that must be met if a structure will be built over or near an abandoned oil well. It is suggested that DOG be contacted for specific requirements during the planning stages of development. It is Kleinfelder's understanding that if a legal opinion is required on proper well abandonment, only an oil and gas attorney who is a member of the California State Bar Association can render an opinion. Additionally, it is unknown if the ownership of the well has reverted to the property owner or if the well (or surface rights) are still owned by the respective oil companies. Copies of the well abandonment letters are included in Appendix D.

Sacramento Aero Services/Natomas Airport

The Natomas Airport has a history of use of hazardous materials which resulted in soil and groundwater contamination.

Background: In 1945 the airport was known as the Branstetter Airport. From 1945 to 1960 Farm Air, Inc. owned by Jack Rich and two partners operated a crop dusting business. Between 1960 and 1981 a second crop dusting company operated the Farm Air Flying Service at the

airport. The airport was also used for small private planes. There has reportedly not been crop dusting businesses at the airport since 1981. Sacramento Aero Services owned the airport since 1979. Planes were cleaned at a wash rack located at the facility. Underground storage tanks and sumps were located onsite.

Type and Extent of Contamination: Waste pesticide was reportedly disposed in pits at the facility and accidental fires periodically occurred according to complaints from the public to the County of Sacramento (Proposition 65 Report, September 1987). A complaint concerning the burning was filed by the City Fire Department in December 1987. A Hazardous Waste Illegal Discharge Report dated December 4, 1987 reportedly indicated that illegal discharges were discovered years before at the facility. A well onsite was used for drinking water for 25 people/day according to an Ecology and Environmental Inc. report dated January 15, 1988. It is no longer used.

Soil contamination extended at least 150 feet northwest of the northern-most building at the facility. The groundwater contamination plume was not fully defined but appeared to be migrating to the southwest according to a summary in the file of Kleinfelder's June 1, 1994 Conceptual Remediation Cost Evaluation report. According to Kleinfelder's limited assessment, the extent of contamination in any area was not defined. Depth to first groundwater was approximately 35 feet below ground surface. The contaminants detected in soil and groundwater were as follows:

Constituent	Concentration	Media Affected
Total Petroleum Hydrocarbons-oil	115 mg/kg	Soil
Lead	2900 mg/kg	Soil
Toxaphene	350 mg/kg	Soil
Pesticides:		
2,4-DDT 4,4-DDE 4,4-DDT	2.26-15 mg/kg	Soil
Acetone	100 ug/l	Groundwater
Benzene	11000 ug/l	Groundwater
Total Petroleum Hydrocarbons-Aviation Fuel	145000 ug/l	Groundwater
Toxaphene	1700 ug/l	Groundwater

NOTE: mg/kg = parts per million

ug/l = parts per billion

Regulatory Agencies Involvement: The site was not likely to be a National Priority List facility based on the low target population and route characteristics. Therefore, no further action under CERCLA was recommended. DTSC indicated that a Preliminary Endangerment Assessment was required (February 23, 1996). The Sacramento County regulatory agencies do not intend to get involved in this site, according to records in the file, since there are insufficient County funds to proceed with the cleanup. The facility ownership was described as "floating".

Remediation: Environmental consultants are being contacted for bid solicitation associated with site assessment and remediation of the facility.

Based on groundwater gradient and distance from the subject site, it does not appear that the hazardous substance release at the Natomas Airport will adversely impact the subject site.

5. HISTORY OF THE SITE

Kleinfelder researches several sources for historical land use information. The purpose of the research is to provide general land use history for the last 50 years using aerial photographs, interviews, Sanborn Fire Insurance Maps, City Directories and Chain-of-Title reports (optional under ASTM Standard, reviewed if provided by the client). The following describes the information revealed by the sources.

5.1 AERIAL PHOTOGRAPHY REVIEW

A review of historical aerial photography may indicate past activities at a property that may not be documented by other means, or observed during a property visit. The effectiveness of this technique depends on the scale and quality of the photographs and the available coverage. Kleinfelder reviewed available photographs at the Sacramento County Office of the USDA Natural Resources Conservation District. The aerial photographs reviewed for this assessment are described below in Table 6.

TABLE 6
AERIAL PHOTOGRAPHS

Date	Photo ID	Scale	Type	Source	Quality
8-18-37	ABC-49-72	1 in. = 660 ft.	black and white, monoscopic	USDA	good
9-12-57	ABC-69T-36	1 in. = 660 ft.	black and white, monoscopic	USDA	good
5-11-64	ABC-1EE-88	1 in. = 660 ft.	black and white, monoscopic	USDA	good
3-27-75	5916-2-093	1 in. = 1200 ft.	black and white, monoscopic	USDA	good
6-84	NHAP 84 06067-155-79R	1 in. = 1000 ft.	black and white, monoscopic	USDA	good

Project Site

The subject site appeared to be utilized as rice fields in all the aerial photographs reviewed. In the 1964 aerial photograph, three small structures were visible on the northwest boundary. It appeared these structures were either trucks or trailers.

Surrounding Areas

The surrounding properties were predominantly rice fields or vacant lots in all of the aerial photographs reviewed. El Centro Road and Del Paso Road were visible from 1937 to 1984. By 1975 Interstate 5 to the east and the canal on the southern boundary of the subject site had been constructed.

NOTE: Aerial photographs only provide indications of land use and no conclusions can be drawn from photographs alone. However, Kleinfelder's review of available aerial photographs did not reveal obvious signs of dumping, spilling, leaking, storing or disposal of hazardous materials or wastes on site.

Copies of aerial photographs have not been included in this draft report because prints were reviewed at public agencies and not purchased. The quality of photocopies made using the aerial photographs does not allow for legible reproduction.

5.2 SANBORN FIRE INSURANCE MAPS

Sanborn Fire Insurance Maps provide historical land use information for some metropolitan and small established towns. Kleinfelder, Inc. requested a search of Sanborn Fire Insurance Maps by EDR. There were no Sanborn Fire Insurance Maps identified for the subject site.

5.3 CITY OR SUBURBAN DIRECTORIES

Polk City Directories and Haines Criss-Cross Directories provide information regarding property occupants by address. Kleinfelder did not review either the Polk or Haines directories due to the lack of an address for the subject site. In addition, aerial photograph review, interviews and regulatory agency records research indicate that the subject site has been vacant, and undeveloped for at least the past 60 years.

5.4 INTERVIEWS

Interviews are conducted as part of environmental assessments to obtain information about current and historical land use. Ms. Rachelle Rounsavill, Kleinfelder, Inc. contacted Ms. Mary Moore, seller representative, on September 8, 1998 to inquire about prior land use of the subject site. Ms. Moore stated the following to the best of her knowledge:

- Prior land use did not include industrial purposes, or a gasoline station, motor repair facility or other related land use.
- Fill dirt has not been brought onto the property that is of an unknown origin.
- There are no registered or unregistered storage tanks located on the property.
- There are no wells located on the property.
- She does not have knowledge of environmental liens or governmental notification relating to past or recurrent violations of environmental law, or the past existence of hazardous substances or petroleum products with respect to the property. She does not know 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.

5.5 TITLE REPORT

A Chain of Title Report or Preliminary Title Report was not provided to Kleinfelder, Inc. These documents may contain information about land use including ownership and other interests in the land, easements, and liens.

5.6 HISTORICAL TOPOGRAPHICAL MAP REVIEW

Historical topographical maps were available for 1907, 1950, 1954, 1967 and 1967 photorevised in 1975 and 1980. The subject site is depicted as 15 feet above mean sea level with relatively level terrain. The subject site was illustrated as vacant, undeveloped property in all the topographic maps reviewed. The surrounding properties were depicted as vacant, undeveloped property. In the 1907 topographic map, Bush Lake was depicted to the east of the subject site. By 1950 Bush Lake had disappeared, Del Paso Road, El Centro Road and the west drainage canal had been constructed to the north, west and southwest of the subject site respectively. In the 1967 topographic map Interstate 5 had been constructed to the east. A well is depicted on the southern boundary of the subject site in the 1967, 1975 and 1980 topographic maps.

6. SITE RECONNAISSANCE

A representative from Kleinfelder, Ms. Rachele Rounsavill, conducted a site reconnaissance on September 2, 1998 to assess and photograph present site conditions. The approximate site boundaries are shown on Plate 2, "Site Map," and color photographs of the site are presented on Plate 3. The site conditions discussed below are limited to readily apparent environmental conditions observed.

TABLE 7
SITE OBSERVATIONS

General Observations	Remarks	Observed	Not Observed
Current Use	Vacant lot	X	
Past Use	Vacant property, rice field		X
Structures			X
Terrain	Level	X	
Interior and exterior observations or environmental conditions that may involve the use, storage, disposal or generation of hazardous substances or petroleum products.		Observed	Not Observed
Hazardous chemical and petroleum products in connection with known use.			X
Fill dirt from an unknown source.			X
Aboveground storage tanks (ASTs)			X
Underground storage tanks			X
Odors			X
Pools of Liquid			X
Drums			X
Hazardous chemical and petroleum products in connection with unknown use.			X
Unidentified substance containers			X

TABLE 7 (CONT.)
SITE OBSERVATIONS

Interior and exterior observations of environmental conditions that may involve the use, storage, disposal or generation of hazardous substances or petroleum products.		Observed	Not Observed
Chemical storage or agricultural chemical mixing areas			X
Asbestos, lead, PCBs			X
Pits, Ponds, or Lagoons			X
Stained soil or pavement			X
Stressed vegetation			X
Hazardous Waste Storage			X
Solid Waste			X
Waste Water			X
Process waste water			X
Wells			X
Dry wells			X
Surface water	Canal on the southern boundary of the site.	X	
Storm basins/catch			X
Storm drains			X
Drains and sumps			X
Septic system			X
Loading and unloading areas			X
Burned or buried debris			X

Kleinfelder conducted a brief drive-by survey of the parcels adjacent to the site on the same day as the site reconnaissance. A summary of the surrounding properties is presented on Table 8 and depicted on Plate 2 in Appendix A.

TABLE 8
SURROUNDING PROPERTIES

North	Del Paso Road and rice field
South	Canal and vacant property
East	Interstate 5 and Arco Arena
West	El Centro Road and rice field

7. FINDINGS AND CONCLUSIONS

Kleinfelder performed this ESA of the subject site in conformance with the scope and limitations of ASTM Practice E1527. In summary:

Aerial photographs, historical topographic maps, and site investigations indicate the site has been predominantly rice and sugar beet fields since 1937. Surrounding land use has remained relatively undeveloped agriculture and rice fields. Del Paso Road and El Centro Road were visible as early as 1937. The canal on the southern boundary and Interstate 5 on the eastern boundary had been constructed by 1950 and 1967, respectively.

During the site reconnaissance, the subject site consisted of fallow, undeveloped agricultural land and a drainage canal. No evidence of storage or disposal of hazardous materials was observed during the site reconnaissance. A pole-mounted transformer was located on the adjacent southern boundary of the subject site. The transformer appeared to be in good condition with no obvious leaks or spills. PG&E has historically not used PCB containing cooling fluid in transformers. However, PG&E will sample and analyze transformer fluid for the presence of PCBs upon request and payment of the testing fees. If PCBs are found, the transformer will be replaced and testing fees refunded.

At the time of Kleinfelder, Inc.'s site reconnaissance, adjacent parcel land use was observed. The site was bordered by Del Paso Road to the north, El Centro Road to the west, a drainage canal to the south and Interstate 5 to the east. Surrounding properties were predominantly rice fields or vacant land.

Ms. Mary Moore, seller representative, was interviewed for information regarding prior land use of the subject property. Ms. Moore was not aware of any environmental liens or governmental notifications relating to past or recurring violations of environmental laws with respect to the property. In addition, Ms. Moore did not know of any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of any hazardous substance or petroleum product on-site.

The DOG had records of an abandoned oil well on site. It should be noted that DOG has requirements that must be met if a structure will be built over or near an abandoned oil well. It is suggested that DOG be contacted for specific requirements during the planning stages of

development. It is Kleinfelder's understanding that if a legal opinion is required on proper well abandonment, only an oil and gas attorney who is a member of the California State Bar Association can render an opinion. Additionally, it is unknown if the ownership of the well has reverted to the property owner or if the well (or surface rights) are still owned by the respective oil companies. Kleinfelder does not recommend additional assessment in the vicinity of the former well.

Multiple pesticides have potentially been utilized on site since at least 1950. In most recent years the predominant constituents used are organophosphates which break down readily and are not likely to accumulate. Mr. Dave Wilson of the Agricultural Commissioners office informed Kleinfelder that an extensive site file review could be conducted for a fee if the client desires a greater certainty of pesticide utilization on site.

There was no record of a water well, underground storage tank or hazardous materials incident on site revealed in Kleinfelder's research. One facility was included on regulatory agency databases within the recommended ASTM radius'. This facility is not likely to affect the subject site based on distance and direction from the subject site.

8. LIMITATIONS

Phase I ESAs are non-comprehensive by nature and are unlikely to identify all environmental problems or eliminate all risk. The attached report is a qualitative assessment. Kleinfelder offers a range of investigative and engineering services to suit the needs of our clients, including more quantitative investigations. Although risk can never be eliminated, more detailed and extensive investigations yield more information, which may help you understand and better manage your risks. Since such detailed services involve greater expense, we ask our clients to participate in identifying the level of service which will provide them with an acceptable level of risk. Please contact the signatories of this report if you would like to discuss this issue of risk further.

Kleinfelder performed this environmental assessment in general accordance with the guidelines set forth in the ASTM Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (Designation E-1527-97), and subsequently approved by you as our client. No warranty, either express or implied is made. Environmental issues not specifically addressed in the report were beyond the scope of our work and not included in our evaluation.

Land use, site conditions (both on-site and off-site) and other factors will change over time. Since site activities and regulations beyond our control could change at any time after the completion of this report, our observations, findings and opinions can be considered valid only as of the date of the site visit. This report should not be relied upon after 180 days from the date of its issuance (ASTM Standard E-1527, Section 4.5).

Any party other than the client who would like to use this report shall notify Kleinfelder of such intended use by executing the "Application for Authorization to Use" contained in Appendix E of this document. Based on the intended use of the report, Kleinfelder may require that additional work be performed and that an updated report be issued. Non-compliance with any of these requirements by the client or anyone else will release Kleinfelder from any liability resulting from the use of this report by any unauthorized party.

9. REFERENCES

1. e-Data Resources, Inc., Arbor Pointe Apartments, Report ID: 284974.3r, August 20, 1998.
2. Munger Map Book, California Oil & Gas Well Report, 1997.
3. Geologic Map of California, State of California Department of Conservation 1977; (Scale: 1 inch = 12 miles).
4. Soil Survey of Sacramento County, California, United States Department of Agriculture, Soil Conservation Service publication, issued April 1993.
5. U.S. Department of Agriculture, Natural Resources Conservation Service, Aerial photographs dated 1937, 1957, 1964, 1975, and 1984.
6. Kleinfelder, Inc., *Preliminary Environmental Site Assessment, Natomas Airport Project*, 23-482605-ESA; May 16, 1996.