
Appendix H



Project No. S2598-07-01
November 6, 2024

Raney Planning and Management, Inc.
1501 Sports Drive, Suite A
Sacramento, California 95834

Attn: Angela DaRosa

Subject: PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT PEER REVIEW LETTER
113.49-ACRE PROPERTY
9350 SHELDON ROAD
ELK GROVE, CALIFORNIA

Ms. DaRosa:

This letter summarizes our review of the Phase I Environmental Site Assessment (ESA) Report dated June 7, 2024, and prepared by Pinnacle Environmental, Inc. (Pinnacle) for the property located at 9350 Sheldon Road (the site) in Elk Grove, California.

BACKGROUND

The site consists of a 113.49-acre parcel developed with a vacant dwelling, detached garage, and an outbuilding. The site is currently unoccupied but was previously used for recycled asphalt storage which has since been discontinued. Pinnacle states that the site has been used for agricultural purposes starting in the 1950s through the 1990s, mainly as a dairy farm starting in the 1970s. Footprints of the former agricultural-related structures, including the former barn and other outbuildings are present at the site. Wastewater from dairy operations was previously stored in a lagoon with documented discharges to a nearby Laguna Creek.

PHASE I ESA REPORT FINDINGS AND RECOMMENDATIONS

Pinnacle identified the following two RECs:

- Multiple violations for wastewater management from dairy operations regarding unauthorized releases to a nearby creek (Laguna Creek) and potential residual manure solids and associated organics in soils at the site.
- Potential former aboveground storage tanks (ASTs) were noted in site photographs in photographs received from the Central Valley Regional Water Quality Control Board (CVRWQCB).

Pinnacle noted multiple non-REC issues related to the site such as:

- Former use of the site for agricultural purposes since the 1950s and operation of a dairy farm from the 1970s through the 1990s and potential methane impacts from residual organics at the site.
- Potential asbestos-containing material (ACM) and lead-based paint (LBP) related to current and former structures at the site.
- A 240-foot long by 40-foot wide by up to 10-foot high soil pile and asphalt grindings pile on the northwestern portion of the property.
- Three existing wells including a domestic well located near the site dwelling, a possible irrigation well located on the eastern site boundary near Sheldon Road, and a relatively newer fenced-in well along the northwestern site boundary and Waterman Road.

Pinnacle also observed a partially excavated septic tank related to the site dwelling but did not consider its presence a concern unless there was an indication that hazardous materials were disposed of into the septic system. If there is suspicion regarding the disposal of hazardous materials into the septic system, then Pinnacle would recommend a subsurface investigation. Pinnacle also observed what appeared to be two approximately 24-inch round pipes in series which Pinnacle labeled “anomalous metal structures” southeast of the site dwelling. Pinnacle mentioned that if the pipes or metal structures are dry wells, then further assessment would be prudent. Pinnacle noted no other RECs or non-REC issues regarding the site.

Recommendations in the Phase I ESA report included:

- Additional assessment of the soil related to the former dairy wastewater lagoon prior to development.
- Laboratory analysis of the soil pile if the soil is to be used on the site.
- Assessment of the anomalous metal structures if they are dry wells.
- Prior to any demolition, renovation, or any activity related to the disturbance of existing and former site structures, an inspection should be performed for ACM and LBP.
- If the wells at the site are not designated for future use, then they should be abandoned or analyzed for drinking water parameters if they are planned to be used.

PEER REVIEW OPINION

In general, we agree with the findings and recommendations presented in Pinnacle's Phase I ESA Report. However, we found that some environmental issues may have been missed during Pinnacle's Phase I ESA. We identify the following additional issues:

- We observed in recent and historical aerial photography that multiple mounds, ostensibly soil overgrown with grass, in the northwest portion of the site. Based on Google Earth imagery, these mounds begin to appear at the site in 2003 and are present in imagery from January 2024. Additionally, there are multiple soil mounds directly north of the 240-foot by 40-foot wide by 10-foot high pile. Given that the source of the multiple soil mounds and piles was not provided to Pinnacle during the Phase I ESA, we recommend assessment of these piles via test pits and soil sampling in accordance with the Department of Toxic Substances Control's Advisory for Clean Import Fill, dated October 2001.
- Pinnacle identified former site ASTs as RECs in the Phase I ESA report; however, no recommendation for further assessment was provided. Given the uncertainty of the AST locations and quantities, we recommend that a Soil Management Plan be prepared and submitted that identifies petroleum hydrocarbons as a contaminant of concern during any future excavation or grading activities at the site.

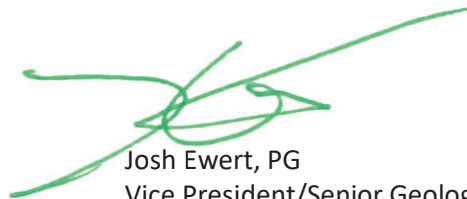
We appreciate the opportunity to assist you with this project. Please contact the undersigned if there are any questions concerning this letter or if we may be of further service.

Sincerely,

GEOCON CONSULTANTS, INC.



Trevor Hartwell, PG
Senior Geologist



Josh Ewert, PG
Vice President/Senior Geologist