

Date: July 30, 2025

Project No.: 118-175-2

Prepared For: Ms. Kishann Rai
DAVID J. POWERS & ASSOCIATES
1871 The Alameda, Suite 200
San Jose, California 95126

Re: Environmental Review
924 and 940 San Rafael Avenue
Mountain View, California

Dear Ms. Rai:

Per your request, Cornerstone Earth Group, Inc. (Cornerstone) is pleased to present this letter summarizing our review of the provided environmental report for 924 and 940 San Rafael Avenue in Mountain View, California (Site). This letter was prepared for David J. Powers & Associates in accordance with our June 19, 2025 agreement.

Project Background

We understand that David J. Powers is providing California Environmental Quality Act (CEQA) support services for a proposed development at the Site, which consists of Assessor Parcel Numbers (APNs) 153-17-044 and 153-17-045. The project includes a General Plan Map Amendment from General Industrial to Medium Density Residential, a Zoning Map Amendment from MM (General Industrial) district to R3-2.2 (Residential Multiple-Family) district, a Development Review and Planned Unit Development Permit to allow 37-unit rowhouse development, replacing two existing commercial structures on the 1.8-acre Site.

Documents Reviewed

This letter briefly summarizes selected information obtained from the following provided report:

- Geosyntec Consultants. May 8, 2017. *Phase I and Limited Phase II Environmental Site Assessment, 918, 924 & 940 San Rafael Avenue, Mountain View, California.*

For complete details, please refer directly to the original report.

Reported Site History

Based on the information reviewed, the Site was historically used for agricultural purposes. Historical aerial photographs depict what appears to have been a residence on the southern portion of the Site by 1939. An apparent additional residence and several outbuildings were added on the northern portion of the Site during the 1940s. The southernmost structures were replaced by the current commercial buildings by 1982. The structures on the northern portion of the Site were removed during the 1990s and replaced by the existing paved parking lot.

The 924 San Rafael Avenue parcel reportedly was occupied by Hackett Construction Company during the 1980s. The 940 San Rafael Avenue was used as a commercial landscaping yard (Baumgratz Landscaping Inc) during the early 1990s. Between 1986 and 1991, the Site parcels were acquired by El Camino Paving and used to support paving company operations until 2015. Stored equipment associated with El Camino Paving remained on-Site at the time of the prior report (Geosyntec, 2017).

Recognized Environmental Conditions

Geosyntec (2017) identified the following two Recognized Environmental Conditions¹ associated with the Site:

- Hazardous materials and petroleum products related to El Camino Paving operations were noted to still be on-Site (as of 2017) in a storage shed. These materials were stored in various containers ranging from 5-gallon buckets to a large motor oil AST. Staining was observed by Geosyntec on and around the two floor drains within the storage shed.
- Geosyntec observed an oil/water separator within a steam cleaning area on the west side of the garage/shop building and a large sump on the north side of the garage/shop building.

El Camino Paving at the Site address is listed as a closed case on the Water Board's leaking underground storage tank (LUST) database. This finding was identified by Geosyntec as a Historical Recognized Environmental Condition². Two gasoline USTs and a diesel UST were removed from the Site in 1988. Several studies were conducted between 1988 and 2000 to evaluate the extent of impacts to soil and groundwater. Remedial work included the excavation of approximately 400 cubic yards of impacted soil and extraction and treatment of approximately 1.3 million gallons of groundwater. In 1995, the Santa Clara Valley Water District (Valley Water) approved the shutdown of the groundwater extraction system. After six years of intermittent groundwater monitoring, the Valley Water approved closure of the LUST case in 2001.

Soil, Soil Vapor and Groundwater Quality Evaluation

To obtain updated data, soil, soil vapor and groundwater sampling was performed at the Site by Geosyntec in 2017. Soil samples were collected from four borings located near the former USTs. Groundwater samples were collected from the former UST area and from the down-gradient (northern) portion of the Site. Soil vapor samples were collected from four locations near the steam cleaning area, and the on-Site garage/shop and storage shed structures.

¹ Recognized Environmental Condition means 1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; 2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or 3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.

² A previous release of hazardous substances or petroleum products affecting the Site that has been addressed to the satisfaction of the applicable regulatory agency and meeting unrestricted use criteria established by the applicable regulatory agency without subjecting the Site to any controls.

Low concentrations of diesel and oil range petroleum hydrocarbons were detected in the soil samples; the detected concentrations did not exceed the Water Board's current residential Environmental Screening Levels (ESLs³).

The six collected groundwater samples were analyzed for volatile organic compounds (VOCs). Several VOCs were detected, but most were at concentrations that did not exceed their respective ESLs. Trichloroethene (TCE) was detected in one groundwater sample at 5.8 micrograms per liter (µg/L), which is greater than its ESL of 1.2 µg/L. Similarly, naphthalene was detected at 7.7 µg/L, which is greater than its ESL of 4.6 µg/L. These ESLs are associated with potential vapor intrusion concerns.

In soil vapor, a few VOCs were detected at concentration exceeding current ESLs, including benzene (up to 30 µg/m³), ethylbenzene (up to 610 µg/m³) and hexane (up to 13,000 µg/m³). For comparison, the residential ESLs associated with these VOCs⁴ are 3.2 µg/m³, 37 µg/m³ and 466 µg/m³, respectively.

Conclusions and Recommendations

Based on the information obtained during this study, Cornerstone concludes and recommends the following:

- Per ASTM E1527-21 and 40 CFR Part 312, a Phase I ESA report is presumed to be viable when it is conducted within one year prior to the date of acquisition of the subject property (or, for transactions not involving an acquisition such as a lease or refinance, the date of the intended transaction). The provided Phase I ESA is dated May 2017. If uses of the Site have significantly changed since 2017, we recommend that the Phase I ESA be updated.
- An oil/water separator reportedly is present within a steam cleaning area on the west side of the garage/shop building, and a large sump was reported to be present on the north side of the garage/shop building. These items were identified as a Recognized Environmental Condition by Geosyntec (2017). Prior to residential development of the Site, we recommend that these features be removed, and the underlying soil be sampled and analyzed for contaminants of concern to evaluate potential impacts to the Site. If contaminants of concern are identified at concentrations exceeding residential ESLs, remedial measures likely will be required by an oversight regulatory agency.
- Hazardous materials and petroleum products related to El Camino Paving operations were noted to still be on-Site (as of 2017) in a storage shed. Based on recent aerial photographs reviewed by Cornerstone, the storage shed was removed in 2022 or 2023. We presume that the hazardous materials observed by Geosyntec also were removed from the Site. If any hazardous materials remain on-Site, they should be properly disposed prior to redevelopment. Staining also was observed by Geosyntec on and around two floor drains within the storage shed. As with the oil/water separator and the

³ Environmental Screening Levels (ESLs) established by the Water Board (July 2025) are used to screen sites for potential human health concerns where releases of chemicals have occurred. These screening levels are risk-based concentrations derived from standardized equations combining exposure information assumptions with toxicity data. Under most circumstances, the presence of a chemical at concentrations below the corresponding screening level can be assumed not to pose a significant health risk.

⁴ The Water Board has not established an ESL for hexane. The noted value was calculated based on the US EPA's regional screening level (RSL) for hexane in indoor air and using the currently recommended attenuation factor of 0.03.

sump noted above, we recommend that the floor drains be removed, and the underlying soil be sampled and analyzed for contaminants of concern to evaluate potential impacts to the Site.

- The Site historically was used for agricultural purposes. Pesticides may have been applied to crops in the normal course of farming operations. Residual pesticide concentrations may remain in on-Site soil. If elevated concentrations of agricultural chemicals are present, mitigation or soil management measures may be required during construction/earthwork activities. Prior to residential development of the Site, we recommend performing soil sampling to evaluate if agricultural chemicals are present. At agricultural properties, pesticides often were stored within outbuildings such as barns or sheds. The recommended sampling should include an evaluation of these areas, along with the former agricultural field areas.
- What appear to have been two residences and associated outbuildings were additionally previously present on-Site. Soil adjacent to structures that are painted with lead-containing paint can become impacted with lead as a result of the weathering and/or peeling of painted surfaces. Soil near wood framed structures also can be impacted by pesticides historically used to control termites. No information was reported that documents the use of lead-based paint or termite control pesticides on-Site; however, if used, residual pesticide and lead concentrations may remain in on-Site soil. Lead and/or pesticides often are identified in soil near old residences and associated outbuildings, such as those historically located on-Site. Prior to residential development of the Site, we recommend that shallow soil at the former structure locations be evaluated for the possible presence of lead and pesticides.
- Sampling by Geosyntec (2017) documented the presence of VOCs in soil vapor and groundwater at concentrations that exceed current ESLs associated with potential vapor intrusion concerns⁵. These VOCs were not identified as a significant concern in 2017 by Geosyntec; however, in recent years, regulatory screening levels associated with vapor intrusion concerns have been lowered (*i.e.*, have become more health-protective).

Because at-grade residential structures are planned and VOCs were detected at concentrations exceeding current ESLs, we recommend that additional sampling be conducted to evaluate if vapor intrusion mitigation measures are warranted for planned structures at the Site. Also, note that no soil vapor samples were collected near the location of the former USTs or near the sump located on the north side of the garage/shop building. The recommended additional evaluation should include soil vapor sampling at these locations. If contaminants of concern are detected above their respective residential screening levels, subsequent investigation and/or remediation should be conducted with oversight from an appropriate regulatory agency (*e.g.*, Water Board, Department of Toxic Substances Control [DTSC], or Santa Clara County Department of Environmental Health).

If the additional investigation concludes that vapor intrusion mitigation measures are warranted, the following should be prepared and implemented under regulatory oversight:

⁵ Vapor intrusion is the movement of chemical vapors from contaminated ground water or soil into a nearby building. Vapors primarily enter through openings in building foundations, such as cracks in the concrete slab and gaps around utility lines. It is also possible for vapors to pass through concrete, which is naturally porous. Once inside the building, vapors may be inhaled posing potential health risks to building occupants.

- A Vapor Intrusion Mitigation Plan describing the measures to be implemented to help prevent exposure of Site occupants to VOCs in indoor air as a result of vapor intrusion. The plan should present the appropriate structural and engineering design features for the proposed occupied spaces to reduce the risk of vapor intrusion into buildings. The plan also should describe pre-occupancy indoor air monitoring procedures to evaluate the effectiveness of the installed vapor intrusion mitigation system. The indoor air monitoring should include preferential pathway sampling.
 - A Completion Report documenting the installation of the vapor control measures identified in the Vapor Intrusion Mitigation Plan, including plans and specifications.
 - A Long-Term Operations, Maintenance, and Monitoring Plan (OMMP) presenting the actions to be taken following construction to maintain and monitor the vapor intrusion mitigation system, and a contingency plan should the vapor mitigation system fail. A financial assurance mechanism should additionally be established (*i.e.*, proof that adequate funds are available for long-term maintenance and monitoring of the vapor intrusion mitigation system) and described in the OMMP.
- We also recommend preparing a Site Management Plan (SMP) and Health and Safety Plan (HSP) for the proposed demolition and development activities. The purpose of these documents will be to establish appropriate management practices for handling impacted soil, soil vapor and/or groundwater that may be encountered during construction activities.

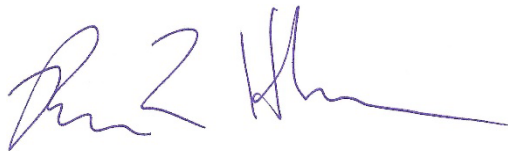
Limitations

Cornerstone performed this investigation to support David J. Powers & Associates in the evaluation of the referenced Site. Conclusions presented in this letter are based on limited, readily available information. This letter, an instrument of professional service, was prepared for the sole use of David J. Powers & Associates and may not be reproduced or distributed without written authorization from Cornerstone. It is valid for 180 days. Cornerstone makes no warranty, expressed or implied, except that our services have been performed in accordance with the environmental principles generally accepted at this time and location.

We thank you for this opportunity to work with you on this important project. Should you have any questions, please contact us at your convenience.

Sincerely,

Cornerstone Earth Group, Inc.



Ron L. Helm, C.E.G.
Senior Principal Geologist