

## **Appendix L-2      Phase I ESA Addendum (March 2016)**

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March 30, 2016

Spieth & Wohlford Inc.  
PO Box 5005  
Rancho Santa Fe, CA 92067

Re: Addendum to Phase I Environmental Site Assessment  
661 Bear Valley Road  
County of San Diego Assessor's Parcel Numbers 237-131-01 and -02  
Escondido, California 92025

To Whom It May Concern:

This letter serves as an addendum to the above referenced Phase I Environmental Site Assessment report dated February 14, 2013 prepared by Vinje & Middleton Engineering, Inc. (VM). This addendum was prepared to address questions pertaining to the report provided in a letter from Harris & Associates dated March 7, 2016. The questions posed in the letter are presented below with responses in italicized font.

### **Site Description**

Page 4, Paragraph 4. The site is zoned RE-20 (Residential Estates) by the City of Escondido. Please clarify what code identifies the site as the "Avocado Grove" zone or revise.

*This appears to be an error in the Phase I ESA document and VM acknowledges that the site is zoned RE-20 (Residential Estates). The zoning designation of the site does not alter VM's conclusions and recommendations regarding the site.*

### **Records Review**

Page 7, Paragraph 1. This paragraph states that the study site was not identified on any database reviewed; however, several sites are identified in the Database Records Reviewed table and in Section 3.2, Results of the Database Search. Please clarify.

*The subject site is not listed on any of the standard ASTM regulatory databases. The site is listed on two non-ASTM regulatory databases (Hazardous Materials Management Division and Haznet) as described on Page 12 of the Phase I ESA report.*

Page 12, Paragraph 5. Please provide a brief summary of each of the three off-site records, including hazard, case status, and applicable reasons the individual site is not a concern (proximity to site and/or case status).

*The three off-site properties mapped between one-half to one mile from the site are identified as Lift Station 3 (2045 S. Escondido Boulevard), Brotherton Plaza (2250 S.*

*Escondido Boulevard) and Arco Gasoline Station (2306 S. Escondido Boulevard). No unauthorized releases of hazardous substances or petroleum products are referenced for the Lift Station 3 and Arco Gasoline Station. These properties are references on the database for the storage of hazardous materials and/or generation of hazardous waste. The Brotherton Plaza property is listed for a release of hazardous substances to the soil only. These properties are not considered to be concerns to the Site. This opinion is based on several factors including the nature of the regulatory database listings, distance of the off-site listed properties from the Site, orientation of the listed properties relative to the site, interpreted direction of groundwater flow, and/or regulatory case status information for the various properties as described in the database report.*

### **Site Reconnaissance**

Page 26, Paragraph 1. Please briefly describe why the on-site septic system, propane tank, and annual application of herbicides for fire suppression are not potential RECs. Additionally, hazards related to the mine shafts are identified on page 19. Please clarify if this safety hazard falls outside of the definition of an REC, or add it to the list of potential concerns.

*Septic systems associated with residential structures are not of environmental concern relative to potential subsurface impacts and are not considered to be RECs. In addition, there is no mechanism for a propane tank to result in an adverse impact to the subsurface and therefore is also not a REC. The former application of pesticides/herbicides has been addressed during the completion of the Phase II Environmental Site Assessment. Mine shafts and associated potential safety hazards fall outside of the definition of a REC.*

### **Recommendations**

Page 30, Paragraph 1. The provided recommendations do not contain adequate information to support the preparation of CEQA mitigation measures. The first recommendation related to the ASTs, agricultural use, smudge pots, and mining residue is further covered by the Phase II Limited Site Assessment. The asbestos and lead issue can be covered utilizing a standard mitigation measure. However, additional detail is needed to cover the risks related to the irrigation wells and the undocumented fill soil. The recommendations should detail what further actions are needed to reduce potential risks to a less than significant level. Please clarify how the irrigation water wells should be removed to avoid potential hazards.

*The water supply/irrigation wells at the property are not of significant environmental concern to the site. However, any water supply wells that are not intended to be utilized in the future should be properly abandoned in accordance with County of San Diego regulations. Undocumented fill soil has been addressed by way of additional assessment and completion of a soil removal action at the site.*

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## Limitations



Page 31, Paragraph 1. The limitations state that the Phase I is recommended for use for only one year from the date of the report. As the Phase I and Phase II were both completed in 2013, it appears that an update is necessary.

*VM can complete an update of the Phase I ESA at the request of the client.*

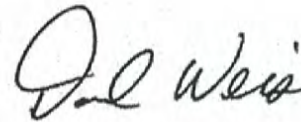
We appreciate the opportunity to be of continued service to you on this project. If you should have any questions regarding this document, or if we can be of further assistance, please contact us at (760) 743-1214.

Sincerely,

**Vinje & Middleton Engineering, Inc.**

Ralph M. Vinje  
Principal Engineer  
RCE #25115



Daniel Weis  
Associate Environmental Scientist

Attachment:

Harris & Associates Comment Letter



March 7, 2016

Ann Dolmage, Associate Planner  
City of Escondido, Planning Division  
201 North Broadway  
Escondido, CA 92026

**Subject: EIR-Level Review of Phase I Environmental Site Assessment, 661 Bear Valley Parkway, Escondido, CA 92025, Assessor's Parcel Numbers: 237-131-01 & -02.**

Dear Ms. Dolmage:

The following presents the results of Harris & Associates' (Harris) review of the Phase I Environmental Site Assessment (ESA) prepared by Vinje & Middleton Engineering, Inc., dated February 14, 2013. Harris reviewed the report for project description consistency with the draft Tentative Map submitted on September 14, 2015; apparent discrepancies in reported data; and adequate analysis of all applicable California Environmental Quality Act (CEQA) Appendix G issues, including identification of a significance threshold, a significance conclusion, evidence to support the conclusion, and mitigation measures, if necessary. Harris did not perform a technical peer-review of the report. As such, comments do not reflect a full quality control review and Harris did not independently confirm any report results or methodology. Harris respectfully requests a response to following questions and comments for preparation of the hazards and hazardous materials analysis of the 661 Bear Valley Parkway Residential Project Environmental Impact Report (EIR).

#### **Site Description**

1. **Page 4, Paragraph 4.** The site is zoned RE-20 (Residential Estates) by the City of Escondido. Please clarify what code identifies the site as the "Avocado Grove" zone or revise.

#### **Records Review**

2. **Page 7, Paragraph 1.** This paragraph states that the study site was not identified on any database reviewed; however, several sites are identified in the Database Records Reviewed table and in Section 3.2, Results of the Database Search. Please clarify.
3. **Page 12, Paragraph 5.** Please provide a brief summary of each of the three off-site records, including hazard, case status, and applicable reasons the individual site is not a concern (proximity to site and/or case status).

#### **Site Reconnaissance**

4. **Page 26, Paragraph 1.** Please briefly describe why the on-site septic system, propane tank, and annual application of herbicides for fire suppression are not potential RECs. Additionally, hazards related to the mine shafts are identified on page 19. Please clarify if this safety hazard falls outside of the definition of an REC, or add it to the list of potential concerns.



**Recommendations**

5. **Page 30, Paragraph 1.** The provided recommendations do not contain adequate information to support the preparation of CEQA mitigation measures. The first recommendation related to the ASTs, agricultural use, smudge pots, and mining residue is further covered by the Phase II Limited Site Assessment. The asbestos and lead issue can be covered utilizing a standard mitigation measure. However, additional detail is needed to cover the risks related to the irrigation wells and the undocumented fill soil. The recommendations should detail what further actions are needed to reduce potential risks to a less than significant level. Please clarify how the irrigation water wells should be removed to avoid potential hazards.

**Limitations**

6. **Page 31, Paragraph 1.** The limitations state that the Phase I is recommended for use for only one year from the date of the report. As the Phase I and Phase II were both completed in 2013, it appears that an update is necessary.

Should you have any questions regarding this review, please contact me at 619.236.1778, ext. 2528 or Sharon.Toland@weareharris.com.

Sincerely,

**Harris & Associates**

Sharon Toland  
Project Manager

