SOIL MANAGEMENT PLAN

(Revision 1)

Jefferson Collection at Cactus
7020 Airway Road, San Diego, California
Voluntary Assistance Program Case #DEH2024-LSAM-000746

August 20, 2024

Presented to:
County of San Diego Department of Environmental Health
Site Assessment and Mitigation Division
5500 Overland Ave, Suite 100
San Diego, CA 92123

On Behalf Of:
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Soil Management Plan

(Revision 1)

Jefferson Collection at Cactus
San Diego, California

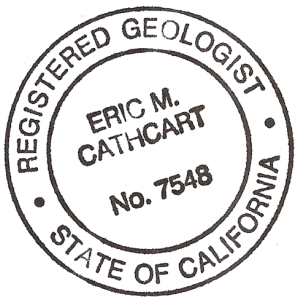
C Young Associates has revised this Soil Management Plan for review, comment and approval by the County of San Diego Department of Environmental Health. This Plan was completed in accordance with the standards of care exercised by environmental professionals in the industry and under the technical direction of the undersigned.

Colin P. Young, CIH
Principal

August 20, 2024
Date

Eric M. Cathcart, MS, PG
Senior Geologist
California PG# 7548

August 20, 2024
Date



Dan Weis, R.E.H.S.
Project Principal

August 20, 2024
Date

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1.0 INTRODUCTION

On behalf of JPI Real Estate Acquisition II, LLC, C Young Associates (CYA) has prepared this Soil Management Plan (SMP) for the Jefferson Collection at Cactus site for review and approval by the County of San Diego Department of Environmental Health (DEH) Voluntary Assistance Program (VAP). This SMP presents a plan to manage surface soils onsite containing legally applied organochlorine pesticide (OCP). Jefferson Collection at Cactus is slated for mixed-use development and consists of one legal parcel.

Jefferson Collection at Cactus enrolled into the DEH VAP in 2024. This SMP has relied on assessments previously performed by CYA and others, as summarized in Section 1.2. It comprises a summary of the prior assessment findings, a conceptual development plan for Jefferson Collection at Cactus, and the management related steps that will be necessary to facilitate said development plans, including:

- Removal and onsite re-placement (burial) of topsoil containing residual concentrations of OCPs above human health risk based screening levels.
- Reassessment of areas where soil targeted for burial has been adequately removed.
- Documentation of both of the above.

The primary objective of this plan is to affirm the protection of human health during the proposed soil management activities. Soil management will be conducted under the oversight of the DEH via the VAP. At the completion of the soil management activities, CYA will submit a Site Closure Report and request "concurrence" from VAP regarding the soil management activities completed.

1.1 Project Location and Description

Jefferson Collection at Cactus is identified by San Diego County Assessor's Parcel Number (APN) 646-100-77-00 and comprises approximately 40 gross acres located adjacent to and north of Airway Road, east of Cactus Road, west of Continental Street and south of State Route 905 in San Diego, California. Figure 1 is a Vicinity Map of Jefferson Collection at Cactus and Figure 2 is a Site Plan of the Jefferson Collection at Cactus project site.

Jefferson Collection at Cactus is located in an area comprising residential, commercial, industrial and agricultural land uses. Properties in proximity include single-family homes, multifamily homes, farms/nurseries, ranches, warehouses and auto (junk) yards. The property was used for agricultural purposes; i.e., vegetable, wheat/dry farming and is currently undeveloped and vacant land.

1.2 Regulatory Status and Previous Assessment Work

Prior to the opening of VAP Case# DEH2024-LSAM-000746, there have been at least two environmental assessments, including soil sampling and analysis, performed at Jefferson Collection at Cactus in recent years and for various entities, including:

- *Phase I Environmental Site Assessment, Paez Property (APN 646-100-77-00), Airway Road and Cactus Road, San Diego, California* (i.e., generally encompassing all of Jefferson Collection at Cactus) by C Young Associates, dated July 8, 2022;
- *Limited Phase II Subsurface Investigation Report, The Collection at Cactus, APN: 646-100-77-00, San Diego, California* by Hillmann Consulting (Hillmann), dated August 16, 2023;

According to the CYA Assessment of July 8, 2022, and in consideration of the Site's agricultural use history, CYA conducted surface soil sampling at the Site concurrent with the completion of this Phase I ESA. The sampling was performed in conformance with the California Department of Toxic Substances Control's (DTSC) Interim Guidance for Sampling Agricultural Properties (Third Revision). In consideration of the site's 40 gross acre size, the following was performed:

- Guidelines for a 40-acre site dictated the acquisition of 50 discrete surface soil samples. Each sample location was plotted on a sampling plan. Deeper samples were not obtained.
- The 50 "discrete" soil samples were composited into 13 composite samples and analyzed for OCPs using EPA Method 8081A. A total of 11 four-point composites and two three-point composites were generated by the /analytical laboratory and analyzed. Thirteen (13) of the 50 "discrete" samples were also analyzed for arsenic in accordance with EPA Method 6010.

The laboratory results revealed the following:

- Total arsenic concentrations were unremarkable and consistent with naturally occurring concentrations of this element in southern California soils. Detections ranged from 2.0 milligrams per kilogram (mg/kg) to 5.14 mg/kg.
- The OCPs 4,4-DDD, DDE and DDT were prevalent in the composite samples but at concentrations below residential human health risk based screening levels.
- One unremarkable and trace concentration of the OCP Dieldrin was detected in one of the soil samples.
- Toxaphene was prevalent at the Site above the residential human health risk based screening level of 510 micrograms per kilogram (µg/kg). Twelve (12) of the 13 composite soil samples contained toxaphene above this target concentration. Detections ranged from 726 µg/kg to 2,470 µg/kg.

Based on these findings, CYA concluded that the OCP concentrations were generally low and did not suggest the misuse, spillage or disposal of such compounds but were randomly detected at concentrations that exceeded their respective U.S. Environmental Protection Agency (EPA) Regional Screening Levels (RSLs) for residential soil. As the pesticides were legally applied, they were not considered an unauthorized application and the soil might only be considered a hazardous waste if it needs to be removed from the parcel and was more-formally characterized, as such. Accordingly, and consistent with many other developments in local agricultural areas, CYA advised that such soil can remain onsite but should be strategically placed in deeper fill areas or areas designated for paved roadways and/or parking lots during grading so that they cannot be reasonably encountered during finish development phases of the project (e.g., graded building pad surfaces, utility placements, etc.).

According to the Hillmann Assessment of August 16, 2023, sixty (60) additional shallow soil samples were obtained from multiple borings across the property in accordance with the same DTSC protocol and similarly analyzed for OCPs. Hillmann also obtained fifteen (15) samples at a subsequent date, based upon the results from the initial 60 samples.

The results indicated low levels of pesticides, including 4,4'-DDD, 4,4'-DDT, and 4,4'-DDE and were compared to the RSLs. None of the 4,4'-DDD, 4,4'-DDT, and 4,4- DDE concentrations exceeded their RSLs for residential or commercial applications. However, toxaphene was detected above residential RSLs in fifty-five (55) of the sixty (60) samples tested. The concentrations ranged from 1.3 mg/kg to 8.1 mg/kg, above the residential RSL of 0.49 mg/kg. Additional analysis for all samples that had concentrations of toxaphene greater than the Federal and State Total Threshold Limit Concentration of 5 mg/kg (TTLC) revealed that one sample was above the STLC limit of 0.5 mg/L of toxaphene, suggesting that this soil is considered California hazardous if disposal of the soil was necessary. The same sample was also subjected to the Toxic Characteristic Leaching Procedure (TCLP) analysis, and the result indicated that sample was below the TCLP threshold limit and would not be considered RCRA hazardous material.

Based on these findings, Hillmann concluded that further sampling and analysis would be unnecessary.

1.3 Conceptual Land Use Plan

A Conceptual Land Use Plan, as of February 6th, 2024, is presented in Appendix A. It reveals plans for mixed-use areas, multi-family residential development, possible institutional development (i.e., recreation), parks, open space and new roadways. Minor modifications may take place as the plan processes through San Diego Development services. However no major changes are anticipated as it is aligned with and follows the current Otay Mesa Specific Plan and Otay Mesa Community Plan.

2.0 SITE CONDITIONS

2.1 Topography

The Site is depicted on the U.S. Geological Survey (USGS) topographic map for the Otay Mesa, California 7.5-minute quadrangle (1996). The Site is shown on the map as being situated at an elevation of approximately 500 feet above mean sea level (msl). The Site is relatively flat and level. Adjoining and surrounding roadways are depicted on the map. A Topographic Map is included as Figure 3.

2.2 Geology

General geologic information pertaining to the Site is presented in the table below.

Geologic Consideration	Details
California Geomorphic Province	Peninsular Ranges
Mapped Soils or Formation	Alluvium, Pleistocene marine and non-marine terrace deposits and the Otay Formation
Description of Soils or Formation	Alluvium - poorly consolidated clay, silt, sand, and gravel Terrace deposits - Thick, stiff, moist, dark brown to olive silty or sandy clay and dense to very dense interbedded reddish brown sandy course gravel and gravelly sands with some silt and clay and interbedded massive cobble layers Otay Formation - Dense to very dense, light olive to gray-brown, interbedded clayey siltstones and silty fine-grained sandstones The Site is also underlain by varying amounts of compacted fill material placed during recent grading activities and derived by the soils noted above.
Distance/Direction to Mapped Faults	No known faults are mapped on the Site. Please refer to the project geotechnical report for additional information

2.3 Hydrology/Hydrogeology

General hydrogeologic information pertaining to the Site is presented in the table below.

Hydrogeologic Consideration	Details
Groundwater Basin or Unit	Otay or Tijuana Hydrologic Unit
Beneficial Uses	Municipal, agricultural and industrial supply purposes
Estimated Depth to Groundwater	Estimated at greater than 100 feet
Estimated Flow of Groundwater	West to southwest
Known Site or Regional Groundwater Contamination Issues	None reported

3.0 SITE CONTAMINANTS AND DISTRIBUTION

As indicated in Section 1.2, OCPs have been nearly ubiquitously detected throughout the upper six inches of soil throughout Jefferson Collection at Cactus. Some random detections were reported between six inches and two feet below the surface, but too few to indicate significant impacts at those depths or at depths beyond three feet. Considering the planned residential use at portions of Jefferson Collection at Cactus, management (i.e. selective removal and burial) of the upper six inches-to-2.5 feet of soil is considered to be prudent.

4.0 PROPOSED SOIL MANAGEMENT

4.1 Re-Use of Soil Containing Legally Applied Pesticides

This section presents a conceptual plan for the re-use of soils containing OCPs at Jefferson Collection at Cactus. These soil management actions will be conducted in conjunction with Site grading activities and in a manner that will be protective of human health and the environment and in consideration of the intended post-grading land uses.

Soil management will involve the removal of soil containing OCPs at concentrations above residential San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs) to a suitable depth to achieve mitigation objectives. The removed soils will be placed as deeper fill into designated, DEH approved areas onsite. Confirmation soil samples will be collected from scraped areas to verify the effective removal of soils containing OCPs exceeding the residential ESLs. Once placed in deeper fill areas, the impacted soils will be overlain by soils that are deemed to be non-OCP containing and generated from deeper "clean" cuts during Site grading. Additional details regarding the planned means and methods for the proper management of OCP impacted soil are further described in the Sections below.

4.1.1 Regulatory Input

The DEH will act as the lead regulatory agency for the soil mitigation activities to be completed at Jefferson Collection at Cactus. The mitigation approach proposed herein has been used at numerous former agricultural properties in San Diego County. Consistent with similar efforts, residential ESLs for OCPs will be used as the screening criteria for Jefferson Collection at Cactus.

4.1.2 Soil Relocation During Site Grading

Significant grading will be required at Jefferson Collection at Cactus to facilitate the planned development, including multifamily housing, luxury amenity buildings, outdoor open space, , parks and various streets and roadways. Site grading will involve a combination of cuts and fills across Jefferson Collection at Cactus, resulting in nearly 780,000 cubic yards of soil being displaced. A cut-fill plan is presented as in Appendix B.

Under the oversight of CYA environmental professionals working under the oversight of a California Professional Geologist, the selected grading contractor for the project will scrape the approximately upper six inches to one foot of soil throughout Jefferson Collection at Cactus and stockpile such soil (as-needed) at one or various locations onsite or transfer the displaced topsoil directly to the portions of Jefferson Collection at Cactus where the material will be buried at greater depths. If stockpiling of soil needs to occur, such soil will be covered with plastic sheeting until displaced again during use as

fill material. The soil containing OCPs will be buried in areas at Jefferson Collection at Cactus that have a minimum separation from the underlying groundwater table of at least 10 feet. In addition, the managed soil will be buried in areas that are at least 10 vertical feet below the future pad elevations, at least five feet below the deepest utility to be installed in streets and roadways, and at least five feet above any subdrain installed. The areas where the managed soil is expected to be buried include paved streets, paved parking lots and the designated park at Jefferson Collection at Cactus (anticipated park and open space areas), as indicated in a Conceptual Land Use Plan, Appendix A. Given the anticipated depth to groundwater beneath Jefferson Collection at Cactus of over 200 feet, CYA anticipates no issues with achieving the required separation from groundwater of OCP impacted soil referenced above.

After the burial of OCP impacted soil is complete, the project surveyor will document the location of the buried material (top, bottom and lateral extent) and such data will be utilized to generate a 3D graphical representation of the location of the burial area(s).

4.1.3 Post-Removal Confirmation Soil Sampling

When the removal of at least the upper six inches to one foot of soil containing OCPs is achieved in areas throughout Jefferson Collection at Cactus, confirmation soil sampling of the resultant surfaces will be conducted to confirm the effective removal of soil that contains OCPs in excess of the respective residential ESLs.

Confirmation soil samples will be collected from the new existing surfaces on a minimum of approximately four-acre centers.

4.1.3.1 Soil Sample Collection

One surface soil sample (collected from 0 to 0.5 feet bgs) and one subsurface sample (collected at 1 to 1.5 feet bgs) will be collected from each confirmation sampling location. Since the original upper 0.5-1.0 feet of soil will have already been removed when these samples are obtained, the samples will actually represent depths of 1.0-1.5 to 2.5-3 feet below the original ground surface.

4.1.3.2 Soil Sample Analysis

All of the surface confirmation soil samples will be analyzed for OCPs by U.S. EPA test Method 8018A. The deeper, subsurface, soil samples collected will be held for possible OCP analysis, pending the outcome of the surface sampling results. The deeper samples will only be analyzed if any OCPs in the surface sample at the same location are detected at concentrations exceeding applicable residential ESLs. In an unlikely instance where a surface soil sample contains one or more OCPs above a residential ESL and the corresponding subsurface sample does not contain elevated OCPs, step-out confirmation soil samples will be obtained from a reasonable distance around the confirmation soil sample in question in order to delineate the lateral extent of soil containing elevated OCPs. Upon receiving results of the additional sampling and

analysis and the area of impact is laterally delineated, the grading contractor will be instructed to make an additional removal to a sufficient lateral extent (based on the step-out sample results) and vertical depth (depth of the non-impacted subsurface sample). In the, even more unlikely, event that a subsurface sample contains one or more elevated OCPs, the grader will also be instructed to make additional vertical removals in approximately six inch-to-one foot increments until confirmation samples indicate suitable removals of soil containing OCPs. Any additional soil that is excavated during the lateral and vertical delineation efforts will be buried in the designated fill area(s). All locations of confirmation and step-out/step-down soil samples (if required) will be documented and incorporated into graphical illustrations that will be included in Jefferson Collection at Cactus Closure Report for the project.

4.1.3.3 Quality Control

Quality Assurance/Quality Control (QA/QC) procedures specified in SW-846 will be followed in the analysis of confirmation soil samples for OCPs. A matrix spike/matrix spike duplicate on one soil sample per batch of samples will be performed to demonstrate that the targeted pesticide can be recovered from the soil. The laboratory data package will include a summary of the QA sample results: blanks, matrix spike/matrix spike duplicate, surrogate recoveries, laboratory control samples, etc., as specified by the method.

4.2 Unexpected Discoveries During Site Mitigation

Following any discovery of an unexpected condition that requires modification to the methods and protocols described in this plan or are outside of the content of the planned amendments described previously in this plan that will be submitted, the DEH will be informed and plan amendments will be submitted for review and approval.

4.3 Record Keeping

4.3.1 Chain-Of-Custody and Sample Tracking

Chain-of-custody procedures will be followed to establish a written record of sample handling and movement between Jefferson Collection at Cactus and the analytical laboratories. All soil samples will be delivered to the analytical laboratories on ice to maintain the samples at a target temperature of 4°C +/- 2°C. The chain-of-custodies will contain the following information:

- Project Location;
- Sample identification number;
- Date and time of collection;
- Sample collector's printed name and signature;

- Sample matrix;
- Analyses requested, and;
- Signatures of individuals involved in the chain of possession.

4.3.2 Field Reports

In order to provide complete documentation of the fieldwork activities, detailed records will be maintained by field personnel. At a minimum, these records will include the following information:

- Site name and address;
- Date;
- Name of field log recorder;
- Team members present on-Site and associated duties;
- Other persons on-Site (i.e. subcontractors, regulatory personnel, etc.);
- A brief summary of meeting(s) held at Jefferson Collection at Cactus;
- Weather conditions, and;
- Any other relevant information.

4.3.3 Equipment Decontamination

Any non-dedicated sampling equipment will be decontaminated between uses by washing with a non-phosphate detergent solution followed by successive rinses in tap and drinking water. Disposable field equipment will not be decontaminated but will be placed into plastic trash bags for proper disposal.

4.4 Reporting

Following completion of the soil management activities proposed herein, CYA will prepare a Closure Report in accordance with the most current edition of the DEH Site Assessment and Mitigation Manual and submit it to DEH for review. The report will describe in detail the implementation of this SMP and items that will include, but are not limited to:

- Grading and soil segregation activities;
- Soil sampling and analysis;
- Analytical results, and;
- Documentation of the disposition of soil, clean or otherwise, that is selectively buried or redistributed at Jefferson Collection at Cactus.

The report will include plans that depict the locations of confirmation soil samples and will demonstrate that soil containing elevated concentrations of OCPs was adequately segregated and contained on-Site. Other supporting documentation to be included with the report will include copies of analytical laboratory reports/chain-of-custody documentation. The Closure Report will request a "concurrence" of an anticipated no-further-action determination for Jefferson Collection at Cactus and will be signed by a State of California licensed Professional Geologist. In addition, all work requiring geologic interpretation for this project will be completed under the oversight of a State of California licensed Professional Geologist.

4.5 Community Health & Safety

In the event that waste material must be exported from Jefferson Collection at Cactus, community health and safety will be secured through implementation of a Community Health and Safety Plan (CHSP). A CHSP is presented in Appendix C and will be modified once it is determined that exporting of waste will be needed, and to reflect the actual profile of the waste to be exported.

5.0 REFERENCES

California State Water Resources Control Board, Water Quality Control Plan for the San Diego Basin (9), San Diego, California, Published 2002;

User's Guide: Derivation and Application of Environmental Screening Levels (ESLs), San Francisco Bay Regional Water Quality Control Board, Interim Final 2016;

County of San Diego Department of Environmental Health, Site Assessment and Mitigation Manual (2004);

USGS Topographic Map, Otay Mesa, California 7.5-Minute Quadrangle (1996)

FIGURES

Figure 1 - Vicinity Map

Jefferson Collection at Cactus
7020 Airway Road
San Diego, California

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Figure 2 - Site Plan

Jefferson Collection at Cactus
7020 Airway Road
San Diego, California

N

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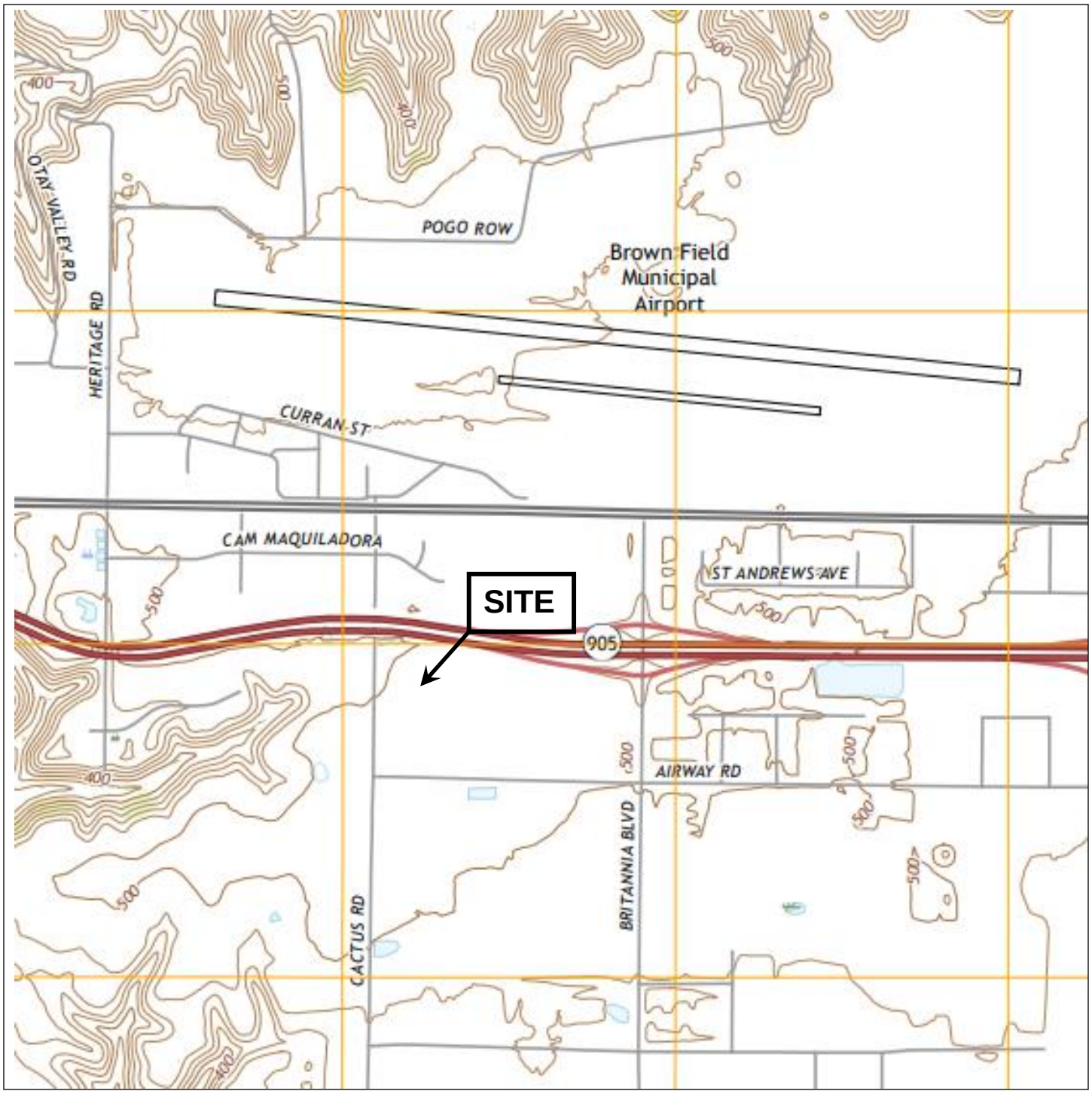

Figure 3 - Topographic Map

Jefferson Collection at Cactus
7020 Airway Road
San Diego, California

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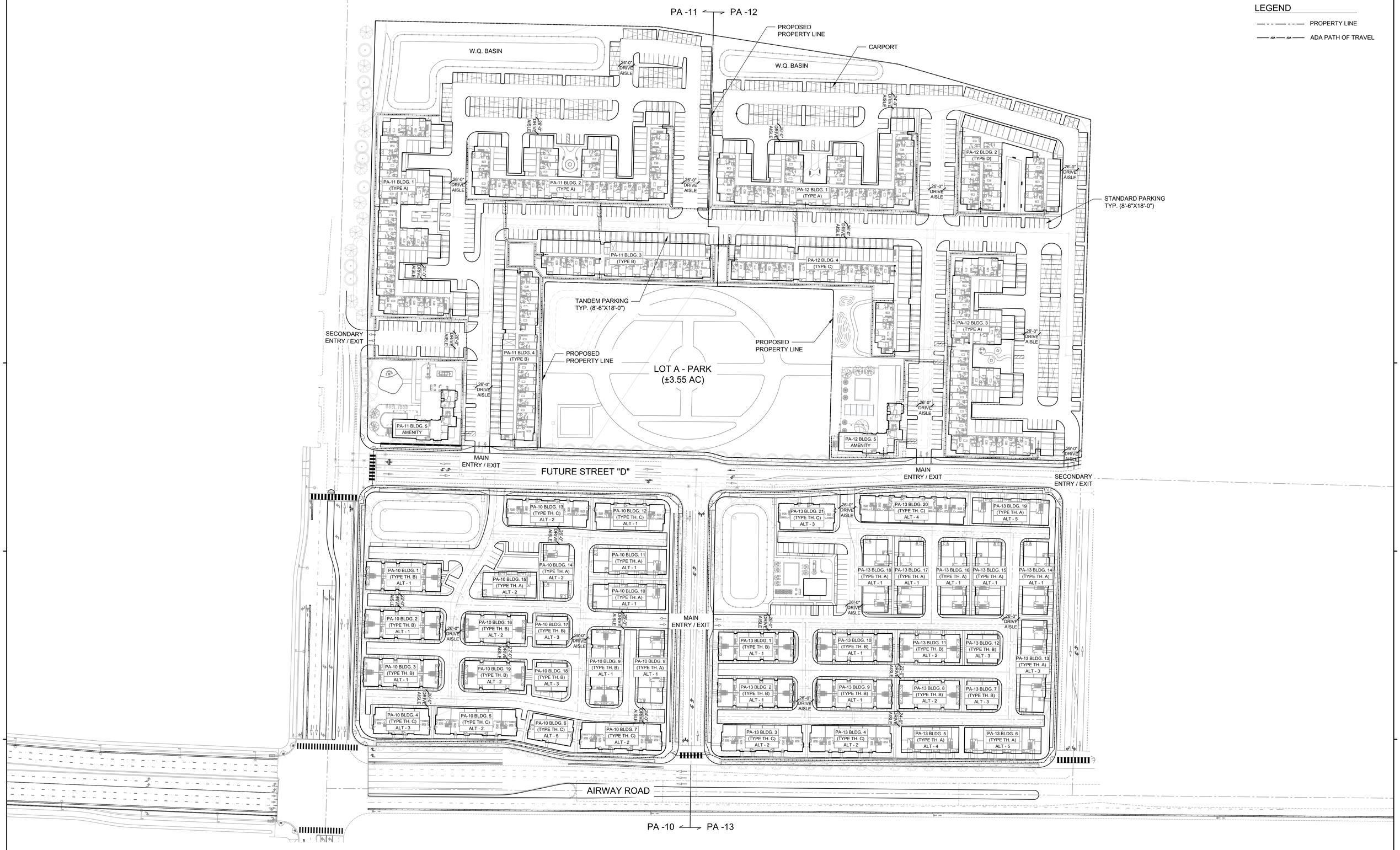
APPENDICES

APPENDIX A

CONCEPTUAL LAND USE PLAN



LEGEND

- PROPERTY LINE
- ADA PATH OF TRAVEL

SITE PLAN 1

0 30' 60' 120'

SCALE: 1" = 60"

N

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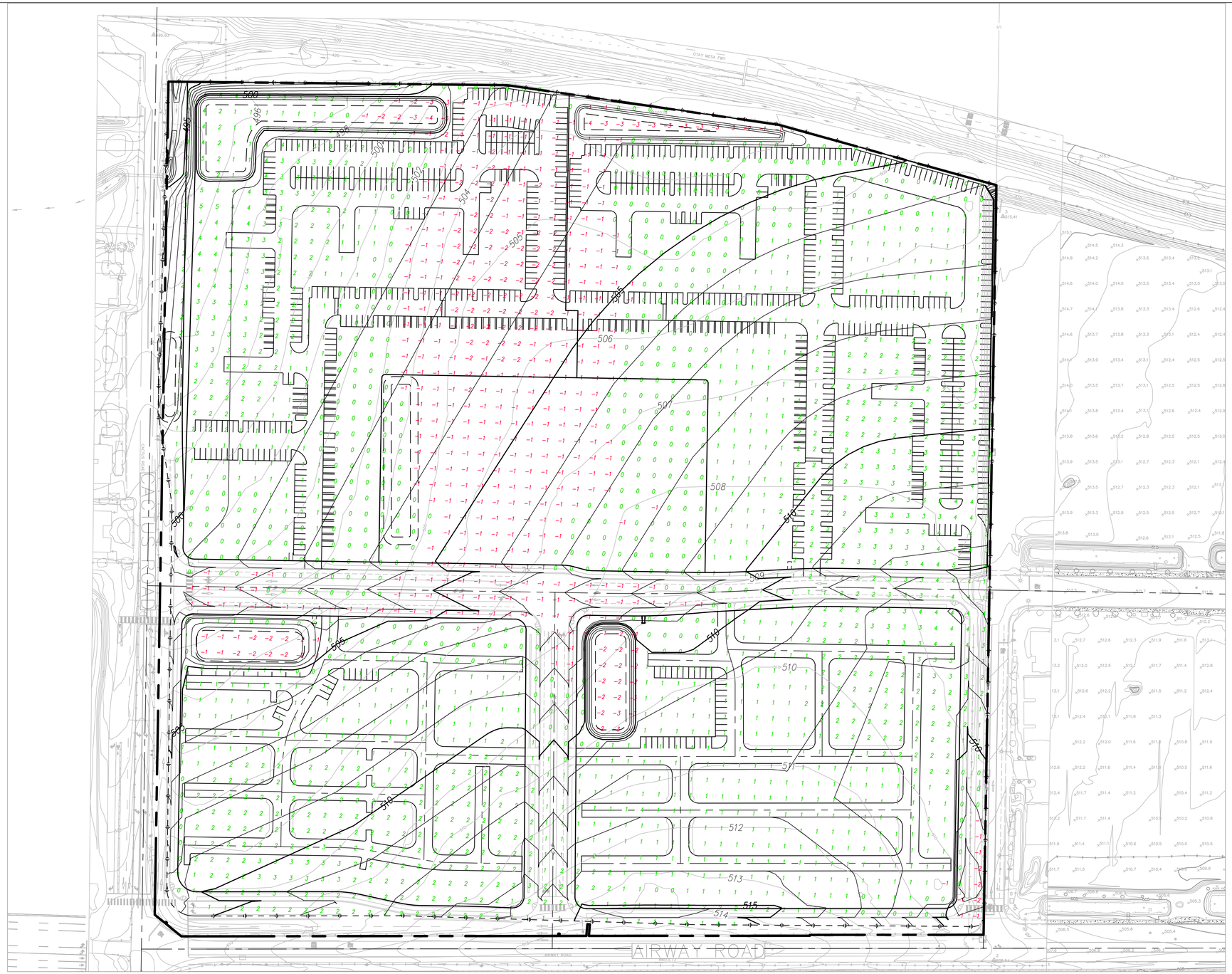
SAN DIEGO, CA

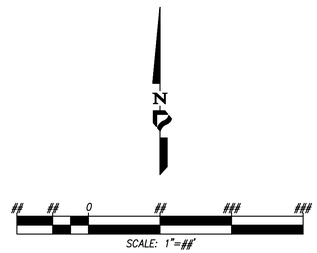
1ST SUBMITTAL 01/29/2024

A001
SITE PLAN

APPENDIX B

CUT/FILL SUMMARY





Cut/Fill Summary

Name	Cut Factor	Fill Factor	2d Area	Cut	Fill	Net	STREET CUT (CU. YD.)
4481.00 C-SURF-VOL	**1.00**	**1.00**	1646300.84 Sq. Ft.	16541.47 Cu. Yd.	59387.44 Cu. Yd.	42845.97 Cu. Yd.<Fill>	18,000 Cu.Yd. (Cut) @1.5' ROAD SECTION
Totals			1646300.84 Sq. Ft.	16541.47 Cu. Yd.	59387.44 Cu. Yd.	42845.97 Cu. Yd.<Fill>	24,845 Cu.Yd. (Fill) WITH STREET CUT

THE COLLECTION AT CACTUS
EARTHWORK EXHIBIT

PROJECT DESIGN CONSULTANTS
Planning | Landscape Architecture | Environmental | Engineering | Survey
701 B Street, Suite 800
San Diego, CA 92101
619.235.6471 Tel
619.234.0349 Fax

Last save by TYLER CLINE, File Name P:\4481\Engr\Earthworks\Earthwork Exhibit\4481.00 C-SURF VOLUM_EXHIBIT20240117.dwg, Date Last Saved 1/17/2024 10:14:13 AM, Date Plotted Last 1/17/2024 10:36:09 AM

APPENDIX C

COMMUNITY HEALTH AND SAFETY PLAN

COMMUNITY HEALTH AND SAFETY PLAN

August 20, 2024

Jefferson Collection at Cactus
7020 Airway Road, San Diego, California

Project Description

The Site comprises approximately 40 gross acres located east of Cactus Road, north of Airway Road and south of State Route 905 in San Diego, California. The Site comprises Assessor's Parcel Number 646-100-77-00

The site is located in an area comprising residential, commercial, industrial and agricultural land uses. Properties in proximity include single-family homes, farms/nurseries, ranches, warehouses and auto (junk) yards. The site was used for agricultural purposes (e.g., vegetable, wheat/dry farming) and is currently undeveloped and vacant land.

This CHSP is included as an appendix to the Soil Management Plan for the project. The primary objective of the Soil Management Plan is to affirm the protection of human health during the proposed soil management activities. Soil management will be conducted under the oversight of the County of San Diego Department of Environmental Health (DEH) via the Voluntary Assistance Program (VAP). At the completion of the soil management activities, CYA will submit a Site Closure Report and request concurrence from DEH regarding the soil management activities completed.

The objective of this CHSP is to assist in providing adequate protection of human and public health during the planned grading activities at the Site and implementation of the Soil Management Plan. This plan is not a worker health and safety plan and it should not be used for such a purpose. Worker health and safety plans will be drafted by the respective work parties involved with the project and implemented by said parties.

Evaluation of Potential Public Exposure to Hazards

Potential public health hazards and exposure pathways resulting from Site activities may result from exposure to dust, noise, and physical hazards. Vapors resulting from petroleum hydrocarbons and associated volatile organic compounds (VOCs) are not considered to be potential concerns at the Site or conditions that will be encountered during grading activities. Potential exposure to dust containing legally applied organochlorine pesticides (OCPs) is the only reasonable potential exposure of concern, albeit minimal. Inhalation of ambient dust is the exposure route of primary concern. In

a lesser capacity, these substances may also enter the unprotected body by skin absorption, eye contact, and/or inadvertent ingestion.

Chemical exposures are generally divided into two categories: acute and chronic. Symptoms resulting from an acute exposure usually occur during or shortly after exposure to a sufficiently high concentration. Symptoms resulting from a chronic exposure generally occur following prolonged or repeated exposures to lower concentrations. The concentrations required to produce symptoms of exposure depend upon the medium in which the compounds occur, the duration of exposure, and the number of exposures. Generally, symptoms resulting from an exposure to dusts containing pesticides include, but are not limited to, irritation of mucous membranes and pharynx, nasal perforation, irritation of the eyes and/or skin.

Potential physical hazards to the public associated with soil excavation include explosion, fire, electrical shock, and noise exposure.

- **Explosions and fires** often arise spontaneously. However, they more commonly result from activities where an ignition source (such as a spark from equipment) is introduced to any flammable materials (e.g., dry brush). Fire extinguishers will be made available during the Site activities to assist in preventing such a situation.
- **Electrical hazards** include buried cables or overhead power lines that pose a danger of shock or electrocution if workers or equipment contact or sever them during Site operations. In accordance with State law, Underground Service Alert (USA) will be notified at least 48 hours prior to any excavation activities. A private utility locating company will also likely be retained by the contractor or Site owner as part of the development activities.

- **Noise hazards** can be created by equipment that generates noise in excess of auditory capacity thresholds. Noise in excess human auditory thresholds can result in physical damage to the ear.

Control Methods

- **Site Security**. The Site is presently secured at public right-of-ways with a chain-linked fence and access gates. Gates will be locked after hours, closed during construction activities, and opened when construction or employee vehicles or equipment enter or exit the project area.
- **Dust Control**. Dust control methods will be taken to minimize potential public exposure to dust generated as a result of the planned excavation activities. Dust suppression measures to be employed include, covering stockpiled soil with plastic sheeting, reducing the pace of the excavation as required until effective mitigation measures are in place, and/or maintaining levels of soil moisture by means of continuous moistening. There will be a zero dust migration policy in

affect for the project during any and all earthwork activities.

- **Noise**. Noise levels are not expected to exceed the maximum allowable levels for the area. Work hours will be limited to between 7 a.m. and 5 p.m., Monday through Saturday.
- **Open Excavations**. Open excavations will be secured from public access by placing barricades or pylons at the perimeter of the excavations and locking access gates to the Site at the conclusion of each day's field activities. In accordance with 29 CFR 1926.652, the walls and faces of any excavations and trenches over 4-feet deep designated for human access will be guarded by a shoring system, sloping of the ground, or some other equivalent means, such as trench boxes, shields, or other approved movable shoring systems. Trenches less than four feet deep where hazardous ground movement is likely will also require protection. Any area to be subjected to excavation will be secured with fencing. The fence will be placed at such a distance from the excavation so as to inhibit viewing in the excavation, and thus reduce the potential for public and transient curiosity. A competent person will make daily inspections of trenches and excavations to assure adequate slopes, shoring, and bracing, and to check for evidence of potential slides or cave-ins. More frequent inspections may be necessary after a rain event.
- **Stockpiled Soil**. Any stockpiled soil will be underlain and covered with plastic sheeting to reduce the potential for runoff.
- **BMPs**. Stockpiles will be protected from storm water run-on by fiber rolls, gravel bags, or other appropriate methods. Soil stockpiles will be protected from wind erosion by application of water and by placing on and covering with plastic sheeting.

Air Monitoring

Being that concentrations of OCPs in Site soil are considered to be low and below CHHSL-R screening levels, CYA does not propose conducting dust monitoring utilizing field instruments during the course of the project. There is expected to be a zero dust migration policy for the project in place and soil will be continuously moistened to minimize dust generated during the earthwork activities. CYA field staff will inform the contractor to increase wetting other dust control measures if any visible dust is observed migrating from the Site during the grading activities.

Site Safety Manager

The designated Site Safety Manager for the contractor will be determined at a later date. The Site Safety Manager will have the knowledge and authority necessary to cease any and all construction activities at the Site in the event of an emergency. The Site Safety Manager will work in conjunction with CYA representatives regarding soil

contamination hazards. In the event of a sudden release of a substance that represents an imminent threat to public health, the Site Safety Manager will initiate the cessation of activity contributing to such a release and notify the DEH.

The primary project representatives are as follows:

- Site Safety Manager /Cell No.: _____ (___) ___-____
- Onsite Construction Manager: _____ (___) ___-____
- Project Manager/Engineer _____ (___) ___-____
- Enviro. Project Manager: Colin Young, CIH (858) 945-7029
- Asst. Enviro. Project Manager.: Daniel Weis (760) 275-9229

Emergency Planning

If a community emergency situation arises, the Site Safety Manager and/or Construction Manager will immediately coordinate the appropriate emergency response with other on-Site personnel and the developer, as well as the County of San Diego DEH.

Worker Health and Safety

As stated previously, the designated Site Safety Manager for the contractor will be determined at the start of grading activities. The Site Safety Manager will coordinate with project representatives to ensure that their workers involved with the displacement and/or handling of contaminated soil are properly trained to conduct such activities. Worker health and safety guidelines or procedures specified by the developer and/or contractors will be monitored by the Site Safety Manager and contractor foreman and include, but are not limited to:

- Establishment of work zone controls
- Conducting health and safety meetings
- Use of proper personal protective equipment
- Personal hygiene guidelines
- Equipment decontamination procedures
- Emergency response procedures

Site Traffic Control

Not Applicable-All agricultural soil to remain onsite

Stormwater Management

A City of San Diego-approved stormwater pollution prevention plan (SWPPP) for the Site will be in place and will be implemented during grading activities. All appropriate BMPs as described in the SWPPP will be implemented during the grading work described in this plan. The SWPPP will be implemented during construction to ensure compliance with City of San Diego requirements and also for the protection of public health and safety.

Great care will be taken via the implementation of the SWPPP to minimize soil or sediment leaving the Site that is not loaded on trucks for off-Site delivery to other locations. The goal will be to have no impacted soil present on adjacent streets/roadways as a result of the soil management and construction activities. The contractor will be responsible for ensuring that trucks are cleaned of overburden soil that may be present on trucks and other vehicles. In addition, stabilized construction entrances consisting of shaker plates and gravel will be present at ingress and egress points of the Site and gravel and/or sand bags, straw wattle and other appropriate BMPs will be placed along the Site perimeter. Street sweeping will also be conducted during any grading activities, as needed.

Public Notification

Public Notification of onsite grading, mitigation and soil/waste management activities will be made as part of the public review and permitting process under the purview of the City of San Diego Development Services requirements (Attachment 1).

Attachment 1

Public Notice

PUBLIC NOTICE

Jefferson Collection at Cactus Development Site
7020 Airway Road
San Diego, California

On behalf of JPI Real Estate Acquisition II, LLC (c/o JPI, the site Developer), notice is hereby given that C Young Associates will be conducting soil management activities at the above referenced site during planned mass grading activities, including the onsite management of agricultural soil containing pesticides, under supervision from the County of San Diego Department of Environmental Health (DEH).

Construction activities are scheduled for _____ to _____ between the hours of 7 a.m. and 5 p.m. Monday through Friday. Saturday work between the hours of 8 a.m. and 5 p.m may also be conducted at times. Efforts will be made to keep dust, noise and odor to a minimum.

If there are any public concerns related to these activities please call:

Onsite Construction Manager: obo JPI

_____ – (___) ___-____ (24-Hour Contact)

Project Manager/Engineer: obo JPI

_____ – (___) ___-____ (24-Hour Contact)

Environmental Consultant: C Young Associates

Colin Young - (858) 945-7029 (24-Hour Contact)
Daniel Weis - (760) 672-6338 (24-Hour Contact)

County of San Diego Department of Environmental Health and Quality – Site Assessment and Mitigation Program, Land and Water Quality Division

Jon Senaha - (858) 505-6798

In the event of an emergency, please call: 911

CALIFORNIA HEALTH AND SAFETY CODE SEC. 25249.6