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September 15, 2025

Kristy Weis
David J. Powers & Associates
1871 The Alameda, Suite 200
San José, California 95126

Subject: Peer Review
1001 South Wolfe Road
Sunnyvale, California 94086
AEI Project No. 516168

Dear Kristy Weis,

On behalf of David J. Powers & Associates (the Client), AEI Consultants (AEI) has prepared this Peer Review of the prior environmental documents prepared for 1001 South Wolfe Road in Sunnyvale, California (the Subject Property). This Peer Review was performed in general accordance with the scope of services outlined in our proposal dated July 29, 2025, which was subsequently authorized on September 3, 2025. The Client has requested that AEI review the Silicon Valley Environmental/Phase-1 Environmental Services (Silicon) reports described below.

AEI was provided with the following documents in September 2025, that were prepared for the Subject Property:

- *Phase I Environmental Site Assessment (ESA)*, prepared by Silicon Valley Environmental/Phase-1 Environmental Services dated June 11, 2024; and
- *Soil Sampling Report*, prepared by Silicon Valley Environmental/Phase-1 Environmental Services dated March 21, 2025

In addition, the following documents were consulted:

- *Establishing Background Arsenic in Soil of the Urbanized San Francisco Bay Region*, prepared by Duvergé, D.J., San Francisco State University Thesis, dated December 2011;
- *Environmental Screening Levels, Revision 2*, prepared by San Francisco Bay Regional Water Quality Control Board, dated June 2019; and
- *Environmental Screening Levels, Revision 3*, prepared by San Francisco Bay Regional Water Quality Control Board, dated September 2025.

Subject Property Description

The Subject Property is located at 1001 South Wolfe Road, in a residential area of Sunnyvale, California. The Subject Property consists of one contiguous parcel measuring approximately 0.32-acres (13,940 square feet). Two residential buildings are situated on the Subject Property, specifically a single-family residence in the eastern part of the property and a private garage

near the center of the property. The remaining portions of the Subject Property are generally unpaved. .

The Subject Property is located at an elevation of approximately 120 feet above mean sea level. The immediate vicinity of the Subject Property is relatively flat. Regionally, the general topographic down-slope is towards the northeast. Based upon the regional topographic down-slope and a review of publicly available data related to nearby cleanup cases, shallow, first-encountered groundwater is expected to be present at depths of approximately 10 to 20 feet below ground surface (bgs). The local hydraulic gradient is anticipated to flow towards the north-northeast.

Background

The Subject Property is located in an area historically developed with large swaths of orchards as recently as the 1950s or 1960s, primarily stone fruit orchards such as apricot, cherry, and prunes. Orchards historically used organochlorine pesticides (OCPs) within their operations. OCPs are chlorinated hydrocarbons that were used extensively from the 1940s through the mid-1970s in agriculture and mosquito control. Representative compounds in this group include dichlorodiphenyltrichloroethane (DDT), dichlorodiphenyldichloroethylene (DDE), dichlorodiphenyldichloroethane (DDD), dieldrin, chlordane, toxaphene, and others. These compounds are known for their high toxicity, slow degradation, and bioaccumulation. Most OCP uses were banned in California in 1974. One common application for OCPs was fruit orchards, which were prevalent throughout many areas of California during the 1940s through the 1960s.. New or redevelopment of properties that resided in potential OCP zones - especially for residential occupancy, now requires testing shallow soils for their residuals.

According to the Phase I ESA, aerial photographs indicated that the Subject Property was adjacent to commercial fruit orchards from at least 1939 to the mid-1970s. Silicon considered proximity to commercial fruit orchards not to be a Recognized Environmental Condition, but a Potential Environmental Condition. Silicon stated that a PEC would exist only if the Subject Property is redeveloped - especially for residential or other sensitive receptor (such as school) occupancies. Persistent OCPs were used prevalently in farming into the 1970's and are now banned. If redeveloped - especially for residential or other sensitive receptor occupancy (such as school or elderly) this could result in shallow soil disposal or mitigation requirements.

Previous Investigation

According to the March 2025 Soil Sampling Report, Silicon collected four soil samples from across the Subject Property from a depth of 1 foot bgs. The soil samples were analyzed for arsenic, lead, and OCPs. Soil results were compared to the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESLs) for direct exposure in a residential setting and construction worker health scenario (SFBRWQCB, 2019 Rev. 2).

Silicon reported the following:

- 1) Arsenic was detected in all soil samples at concentrations ranging from 2.4 to 6.3 milligrams per kilogram (mg/kg), all of which exceeded the residential and construction worker direct exposures ESLs. The detected concentrations in all four samples were typical of background arsenic concentrations in the region, with the upper range being 11 mg/kg (Duvergé, 2011).
- 2) Lead was detected in all soil samples at concentrations ranging from 5.7 to 8.0 mg/kg, all of which were below the residential and construction worker direct exposure ESLs.
- 3) Dieldrin was detected in two of the four soil samples at concentrations of 0.036 and 0.26 mg/kg, respectively, exceeding residential ESL (0.037 mg/kg) but well below the construction worker direct exposure ESL (1.1 mg/kg).

Silicon compared the laboratory results of the investigation with the 2019 ESLs. Shortly after Silicon submitted the March 2025 Soil Sampling Report, the SFBRWQCB issued updated ESLs (SFBRWQCB, 2025, rev. 2). Regarding the target analytes for the Soil Sampling I investigation, the 2025 ESLs remained the same as the 2019 ESLs, with the exception of dieldrin. The SFBRWQCB lowered the residential ESL from 0.037 mg/kg to 0.034 mg/kg. Therefore, two soil samples now exceed the 2025 revised residential direct exposure ESL.

Silicon concluded that the dieldrin concentrations in the two soil samples were not indicative of large-scale, gross contamination of Subject Property soils with dieldrin, nor were they indicative of some presently unknown onsite source. Furthermore, Silicon judged that an ongoing human health risk to future construction/development crew personnel did not exist. Silicon did consider that the slightly elevated concentrations of dieldrin might potentially pose a human health risk to future residential Subject Property occupants. Following any residential development of the Subject Property, Silicon recommended exposed, surficial soils that may be encountered by occupants (lawns, planters, garden beds, landscaping, etc.) be sampled before occupying the Subject Property to ensure that any remaining concentrations of dieldrin in Subject Property soils were below applicable residential ESLs. Otherwise, Silicon recommended no further action.

Comments:

Given that two shallow soil samples exceed the residential ESL, AEI considers that much or even most of the shallow soil below the eastern two-thirds of the Subject Property likely contains concentrations of dieldrin that exceed the residential ESL. Although the measured concentrations of dieldrin do not exceed the construction worker ESL, AEI recommends the following:

- 1) After the structures on the Subject Property are demolished, conduct an additional subsurface investigation, where 10 to 20 soil sampling locations are evenly spaced across the Subject Property in a grid pattern, to the extent possible. Collect shallow soil samples using hand tools from depths of 1 and 2 feet bgs;
- 2) Analyze the soil samples for concentration of dieldrin; should the 1 foot samples identify dieldrin above the residential direct exposure ESL, analyze the deeper corresponding

- soil sample to determine the lateral extent. Step-out soil sample may also be required in order to determine the lateral extent of impacted soil; and
- 3) A Soil Management Plan should be prepared the Subject Property to protect the environment and construction workers of potentially impacted soil during construction activities.

Limitations and Reliance

AEI relied on the above provided information which was derived from a third-party company. AEI cannot guarantee the thoroughness or reliability of the information provided. This review did not include any additional activities or considerations of any additional information beyond the information listed above. AEI was not provided with additional current site use information or any additional historical information regarding site uses or surrounding site concerns, as they may have changed since September 15, 2025.

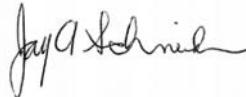
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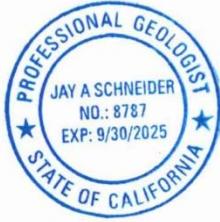
Closing

AEI appreciates the opportunity to support this important project. If there are any questions regarding our investigation, please do not hesitate to contact Tory Golino at 408.628.0675, tgolino@aeiconsultants.com, or the undersigned.

Sincerely,



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