



July 24, 2026
Project No. 0075.001

Mayor of Escondido and City Council Members
201 North Broadway
Escondido, CA 92025

Subject: Proposed Hamilton Lane Development Project (PL-24-0067) and Environmental Concerns Related to the Chatham Barrel Site

Dear Mayor White and City Council Members,

Snyder Geologic has been retained by residents in the vicinity of the proposed Hamilton Lane Development Project (the project) including Heidi Whitman and Kevin Carlin, Norm and Debbie Green, and Sheryl and Waco Kerstien to evaluate certain aspects of the proposed project with regard to the ongoing environmental issues from the Chatham Brothers Barrel Yard site (Chatham site). I am a California Professional Geologist and Certified Hydrogeologist with 30 years of experience in hydrogeology and environmental investigations similar to the Chatham site, 25 of which have been in San Diego County. I have personally investigated dozens of contaminated sites in San Diego County in a variety of hydrogeologic settings, all of which have been under the regulatory oversight of the Department of Toxic Substances Control (DTSC) (four current projects), the Regional Water Quality Control Board, San Diego Region (RWQCB, Regional Board), and the County of San Diego, Department of Environmental Health (DEH).

PURPOSE

The purpose of this letter is to provide my analysis of the project with respect to the environmental issues related to the Chatham site.

BACKGROUND

It is my understanding from the documents I have reviewed that the proposed project will consist of a lot split into five, approximately 1-acre +/- lots and the development of one residential single family home on each lot. In addition to the five homes, a bioretention basin will be constructed near the southwest corner of the project for stormwater retention. Project grading will consist of cut and fill resulting in the movement of approximately 8,700 cubic yards of material; however, the site will be a balanced site, i.e., there will be no import or export of soil according to the developer.

GRADING AND BLASTING

Having visited the site on June 25, 2026, it was difficult to conceptualize how the site will be a balanced site regarding grading. There is a significant elevation change from street level to the approximate center of the site, at which is a large outcrop of bedrock. It appears that if the site is to be balanced and require no import or export of material, significant bedrock blasting would be

necessary and burial of large pieces of bedrock would be required. Additionally, shallow bedrock may also be problematic for installation of utilities. I am unaware of any geotechnical reports that have been provided for the site that may provide some clarity regarding these issues.

If blasting is required, and because the bedrock geology beneath the Chatham and project sites is complex, I have concerns that blasting could affect the hydrogeologic conditions beneath the site, altering flow patterns and potentially contaminated groundwater from the Chatham site and in the vicinity of the project site. It appears that neither DTSC or the Regional Board is aware that blasting of the bedrock may be required. The Chatham plume is within this complex bedrock aquifer in the area of the development project and altering the bedrock aquifer by blasting should be avoided.

Because DTSC and the Regional Board have not evaluated the potential for blasting, the City should require the applicant to submit the project plans and investigation documents to DTSC and the Regional Board and to formally request their technical input before any approval. DTSC has advised that a party who causes the groundwater plume to migrate to a new area may be named a responsible party for allowing the migration of hazardous substances. Blasting in an area which is primarily a fractured rock aquifer could produce such a result.

BIORETENTION BASIN

The bioretention basin proposed for this site appears to function only as a collection and discharge basin to the stormwater system. It appears to be designed with a single-layer 30-mil liner designed to prevent stormwater from infiltrating into the subsurface. There are some concerns with this bioretention basin and due to potential negative effects of the basin being installed improperly or failing. I do not believe a stormwater basin should be approved for this project.

I am unaware of any geotechnical reports that have been prepared for the grading and bioretention basin; therefore it is unclear if blasting will be required to reach the target depths required for excavating for the basin. If blasting is required, the same concerns apply to the installation of the bioretention basin as they do to the blasting required for general grading.

While it appears that the design of the bioretention basin is to prevent stormwater infiltration into the subsurface, a robust quality assurance/quality control program should be developed and implemented during the installation of the liner to guarantee that stormwater would not enter the subsurface. If stormwater enters the subsurface as recharge, such recharge would likely alter groundwater flow in the vicinity and downgradient of the project site. This has the potential to alter the groundwater contaminant plume. Should the liner ever fail or be punctured during installation, this could result in stormwater entering the subsurface and altering groundwater flow.

If the development is approved with this basin as part of the project, a redundant (second) liner should be installed and monitoring points beneath the basin should be required and monitored to detect possible failure. A response plan should be prepared to address potential failure of the basin.

GROUNDWATER QUALITY AT PROJECT SITE

There is concern that the subsurface beneath the proposed project may be impacted with contaminated groundwater that could pose a risk to those that may live in homes to be developed on the project site. The geology beneath the site is a complex fractured bedrock system (as acknowledged by Regional Water Quality Control Board Staff) in which groundwater, and the contaminants dissolved in it, flows through discrete fractures. Because of this, portions of a groundwater plume may be missed if monitoring wells do not penetrate the fractures through which contaminated groundwater is flowing. Related, monitoring wells were not installed on the 6-acre property, therefore, the groundwater quality directly beneath the site is unknown.

Figures ES-3, ES-4, and ES-5 from the July 8, 2024 letter report "Final Five-Year Remedy Review Report, Revision 1.0, Chatham Site" may be somewhat misleading, particularly ES-3 and ES-5 since there are no monitoring wells on the proposed development project site. Well 33-G3 is sampled regularly and has been below reporting limits, but the nearest well, MW-67, more than 500 feet from Well 33-G3 does contain trichloroethene (TCE) and tetrachloroethene (PCE). Other wells used to contour the TCE plume are more than 1,000 feet from the project site. The contouring of the TCE plume in these figures has been done in such a way so as to give the impression that the TCE plume is largely absent beneath the site. However, the concentration beneath the site is not known, only that Well 33-G3 does not contain detectable TCE. As a more conservative approach, the 5 microgram per liter TCE contour could be drawn much closer to Well 33-G3 as the concentrations beneath the site are not known. There may be TCE beneath the project site, but without monitoring wells located there, there is a significant unknown.

On the Chatham remediation site, some wells that have been sampled over the past six years (2020 to 2025) have shown concentration trends that are not stable. In particular, P-11, a shallow plume well located in the southwest corner of the Chatham site, initially showed variably decreasing trends but now shows increasing trends since 2023 for TCE, PCE, cis 1,2-dichloroethene (DCE), 1,2-dichloroethane (DCA), 1,1-DCE, and 1,1-DCA.

Well MW-69, located southeast of the project site, has also shown some increases over the past five years and the trend is not stable. While downgradient of the site, it is indicative of a plume that is not stable or decreasing.

Well MW-67, located immediately upgradient of the project site, had a decreasing trend from 2020 to 2024, but concentrations from samples collected in 2025 has shown an increase in concentrations.

These data indicate the contaminant plume is not stable, and while some wells in the project area do not contain contaminants at or above laboratory reporting limits, it is clear that it is difficult to detect contaminants in the groundwater in this fractured bedrock aquifer unless wells are located where fractures containing the contaminants are. It is not uncommon to miss contaminants in the subsurface in a fractured bedrock system; therefore, the project site may have undetected contaminants that could pose a health threat. Without wells on the proposed development site, the question of whether the plume is beneath the site is unknown and should be determined.

SIGNIFICANT DATA GAPS

There are several significant data gaps that should be addressed, or re-analysis of data that should occur, to better analyze the impact of the proposed development project on the groundwater plume from the Chatham site.

- A geotechnical investigation should be conducted for the development site to better understand the geologic conditions in the subsurface. There are significant concerns regarding the need for blasting for site grading, installation of utilities, and excavation for the bioretention basin. This should be a minimum requirement of City Council.
- While a limited soil and soil gas evaluation of the development project was conducted in 2026, we believe a more robust evaluation of the environmental conditions at the site should be conducted given the project's proximity to the Chatham site. Specifically, we believe sampling of deeper soil and soil vapor should be conducted as well as an evaluation of the potential for perched groundwater that may be contaminated.
- Blasting may be required at the project site which may alter groundwater flow in the fractured rock aquifer. Given that there are supply wells downgradient, there is a significant data gap in understanding how the bedrock blasting may affect groundwater flow and therefore contaminant flow in an area that is impacted by VOCs and the groundwater is a valuable resource. The City should require the applicant to formally provide the project design and investigation documents to DTSC and the Regional Board and to request their technical input on activities that may be incompatible with the remediation or that could cause migration of the Chatham groundwater plume.
- The presence of the groundwater plume beneath the site is unknown as no monitoring wells are on the site and nearby wells do show evidence of groundwater contamination.
- Historical documents on the Envirostor web site do not provide the level of detail regarding historical water quality data upgradient, in the vicinity, and downgradient of the development project site. There are recent fluctuations in chemical concentrations at some wells that are concerning. It is nearly impossible for me, as an environmental consultant with 30 years of experience, to determine how water quality has changed over time at wells on and around the proposed project site. This is critical information that should be readily available for review.

The City and DTSC should require more transparent accounting of the environmental data, over time, at each well from which water quality samples have been collected for this project. Based on my experience with DTSC on similar sites, there has been a requirement to provide historical data in reports on water quality, even if only included in an appendix. These data are missing from nearly all of the reports I have reviewed.

Presenting data such as total VOCs detected or an historic range of concentrations, is not useful or informative; in many of these reports, historical data from many of the wells are missing entirely. What is useful is to have historical water quality data for each well for each chemical in the groundwater plume, over time. This allows technical reviewers of the information to be able to understand how chemical concentrations of harmful con-

stituents have changed over time. The DTSC should provide this information for review prior to considering approval for this project.

RECOMMENDATIONS

Based on my review of available data, we make the following recommendations:

- The City Council should require, as a condition of any further consideration, that the proposed project design documents and investigation reports be evaluated for the potential health risks to future site occupants and the threat that site construction activities may pose to the Chatham groundwater plume and the ongoing remediation. The City should request DTSC's and the Regional Board's technical input on these documents, while recognizing—per DTSC's own statement—that these agencies have no review or decision-making role over the development and that the decision rests with the City.
- Specifically, the City should request DTSC's and the Regional Board's input and evaluation of the potential for blasting of the bedrock during project construction, if required, to alter groundwater flow in what is a complex bedrock aquifer hydrogeologic system.
- The proposed bioretention basin should also be closely analyzed for potential fatal flaw design elements, quality-control installation considerations, and the need for ongoing monitoring of the system to ensure failure of the system does not occur and remedies are in place to address failure if it occurs. The City should require this analysis and request a review of it by DTSC and the Regional Board.
- Monitoring wells should be drilled at the proposed development site to investigate whether the plume is present beneath the site and if it poses a health risk to future residents. These wells should be monitored on the same schedule as those for the Chatham site. An evaluation of the potential for shallow, perched contaminated groundwater is also recommended.
- Soil vapor should be investigated with a more robust sampling program with a greater number of sampling locations and variable depths. At a minimum, soil vapor should be tested at various depths beneath each proposed residential building.
- A soil management plan should be prepared to describe the precautions that would be taken to ensure contaminated soil is managed in such a way that is protective of neighboring properties. Testing of the soil in all areas of the proposed project to depths of maximum excavation is recommended prior to and during soil disturbance activities.
- Irrigation and water supply wells should be prohibited on the project development site by the City. These types of wells have the potential to bring contaminated water to the surface and alter the flow patterns of the contaminated groundwater plume.

We appreciate the opportunity to provide some additional clarity regarding the known and potential environmental issues associated with developing the proposed project. We would welcome the opportunity to further discuss these issues and answer any questions that may arise after reviewing this letter.

Respectfully submitted,
SNYDER GEOLOGIC, INC.



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Principal Hydrogeologist

