

CITY PACIFIC LAND CO., LLC. ENVIRONMENTAL CONDITION ASSESSMENT PLAN



24300 Pacific Highway South
Kent, Washington 98032

Prepared for:
City Pacific Land Co., LLC.
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Prepared by:
GO Spectrum NW, LLC.
7981 168th Avenue, Suite 212
Redmond, Washington 98052

May 5, 2026

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1 INTRODUCTION

This Environmental Condition Assessment Plan was prepared to present GO Spectrum NW (Spectrum) scope of work for an Environmental Condition Assessment Plan at a Kent, Washington commercial property. The property is located at 24300 Pacific Highway South, Kent, Washington (Subject Property). The Subject Property was entered into the Washington State Department of Ecology Volunteer Cleanup Program (Ecology VCP) on September 15, 2025, as the Sutton Trucking NW3447. Ecology VCP reviewed the documentation of past Subject Property environmental investigations and on March 9, 2026, provided an Opinion Letter that stated that their review of past Subject Property investigations left data gaps with regard to the Subject Property subsurface characterization. Spectrum prepared this Environmental Condition Assessment Plan for the Subject Property Owner, City Pacific Land Co., LLC. (City Pacific Kent) and Ecology VCP to document our proposed scope of work to address these data gaps.

1.1 INVOLVED PARTIES

The Subject Property owner is City Pacific Kent, and Spectrum is the Subject Property Owner's environmental consultant. The Subject Property is currently enrolled in the Ecology VCP as the Sutton Trucking Cleanup Project – NW3447, and it is our intent to receive No Further Action status for the Subject Property.

1.2 ENVIRONMENTAL CONDITION ASSESSMENT PLAN ORGANIZATION

This Environmental Condition Assessment Plan begins with sections presenting the involved parties, property overview, background Subject Property environmental information, Subject Property overview and legal description, and the purpose for the project. Subsequent sections present a discussion of proposed sampling locations, sampling procedures, and analytical protocol. Two figures follow the main text. Figure 1 is the Subject Property Location Map, and Figure 2 is the Subject Property Plot Plan.

1.3 SUBJECT PROPERTY OVERVIEW

The Subject Property is located east of Pacific Highway South (State Highway 99/509). It is accessible from Pacific Highway South via a west-east orientated driveway on the west side of the Subject Property (Figure 1). The Subject Property is owned by City Pacific Kent. The Subject Property is a 9.44-acre parcel that is currently vacant and was used most recently by Sutton Trucking, NW Vehicle Storage, and Redmond Heavy Hauling as a "trucking facility" for storage, washing, and light maintenance of various trucks, trailers, and construction equipment. The Subject Property has also previously been used by several other trucking and construction companies, along with other miscellaneous light industrial businesses (e.g., welder). Companies include Gresham Transfer, Inc., St. Johns Motor Express, Widing Transportation, Inc., H Ritchie Tire Co., Aggreko, Inc., and Lease Rite, Inc., among others. The Subject Property was developed in 1951 with various structures and appears to have been vacant, forested land prior to 1951 since at least 1936.

Based on recorded deeds, the Central Puget Sound Regional Transit Authority/Sound Transit secured numerous easements on the far eastern portion of the Subject Property parcel beginning in 2018/2019 for the construction of a light rail line. Based on the Subject Property reconnaissance, this approximately ± 0.42 -acre easement (permanent guideway easement) is now fenced off from the remainder of the Subject Property and is being used for the generally north-south orientated overhead light rail system (Figure 2).

1.4 PROPERTY LEGAL DESCRIPTION

King County Parcel Numbers: 212204-9046.

Legal Description: S HALF S HALF NE QTR NE QTR STR 21-22-04 LYING EAST OF ELY MARGIN OF PACIFIC HWY S (FORMERLY STATE ROAD NO 1) 100.00 FT IN WIDTH; EXC WLY 12.00 FT OF S 20.00 FT (AS MEASURED ALONG WLY LINE) CONVEYED TO CITY OF KENT BY DEED UNDER RECORDING NO 20031202001436.

2 PAST ENVIRONMENTAL INVESTIGATIONS

The results summaries of past Subject Property environmental investigations are provided as background information for this Environmental Condition Assessment Plan.

2.1 SHANNON & WILSON 2025

Shannon & Wilson conducted a Phase II Environmental Site Assessment of the Subject Property during February 2025. The results of the Phase II ESA are summarized below.

Based on the results of the Phase II ESA soil and groundwater investigations completed at the Subject Property, it was determined that:

- Soil impacted with the chlorinated solvent PCE was detected in soil above applicable WA DOE MTCA cleanup levels;
- Groundwater was encountered at approximately 32 feet below ground surface (bgs) in MW 1;
- Groundwater is impacted by PCE and TCE above the WA DOE MTCA cleanup level of 5 g/l;
- The existence of daughter products TCE and cis 1,2 DCE in conjunction with PCE at SB 3 provides evidence of an older PCE release that has been degrading over time;
- Additional degradation daughter products can accumulate at concentrations that are also not protective of human health or the environment;
- TCE is also classified as a hazardous substance that has adverse effects on human health and the environment;
- The degradation of PCE and TCE to concentrations that are protective of human health and the environment is highly variable and could take decades to achieve; and
- The horizontal and vertical extent of the PCE impacts and mass of remaining PCE contaminated soil and groundwater are not fully defined at the Subject Property (Shannon & Wilson 2025).

2.2 GEOENGINEERS 2018

GeoEngineers conducted a Focused Phase II Environmental Site Assessment within a Sound Transit easement in the east portion of the Subject Property for Sound Transit - Federal Way Link Extension during July 2018. The results of the Phase II ESA are summarized below.

Soil

Twenty-four soil samples collected from the borings were submitted for chemical analysis of one more of the following: gasoline-range petroleum hydrocarbons, diesel- and lube oil-range petroleum hydrocarbons, VOCs, SVOCs including phenols, PAHs, and priority pollutant metals. Of the 24 soil samples, eight shallow samples collected at 0 to 1-foot bgs were analyzed to evaluate contaminants associated with the Tacoma Smelter Plume (TSP); the remaining 16 soil samples were analyzed for potential contaminants associated with current and former operations on the Parcel and with fill.

Diesel- and/or lube oil-range petroleum hydrocarbons were detected in six of 17 soil samples analyzed. The diesel- and lube oil-range petroleum hydrocarbons in a sample from a depth of 5 to 6 feet bgs at 3,600 mg/kg was the sole sample with exceedance of MTCA Method A cleanup level of 2,000 mg/kg.

Low-level VOCs were detected in soil samples FL252-B3-2.5-3.5, FL252-B4-5-6 and FL252-B4-7.5-8.5. Low-level SVOCs not typically associated with petroleum releases were detected in soil samples FL252-B1-0-1.5, FL252-B4-5-6 and FL252-B4-10-11. The compound bis(2-ethylhexyl) phthalate identified in the regulatory files as a residual contaminant associated with The Parcel was previously used by Widing Transportation (Widing), also a trucking company. Widing was not detected in the Focused Phase II ESA soil samples.

Carcinogenic and noncarcinogenic PAHs were detected in soil samples FL252-B1-0-1.5 (lube oil also detected), FL252-B1-2.5-3.5, FL252-B3-0-1, FL252-B4-0-1 (lube oil also detected) and FL252-B4-5-6 feet bgs (diesel and lube oil also detected as noted above). The detected concentration of cPAHs in sample FL252-B1-0-1.5 (0.7828 mg/kg) was greater than the corresponding MTCA Method A cleanup level of 0.1 mg/kg. Based on these boring locations and sample depths, the source(s) of cPAHs and petroleum hydrocarbons detected in these samples may be related to past releases from truck maintenance or washing operations.

Metals, including arsenic and lead, were not detected at concentrations greater than the corresponding MTCA cleanup levels in the soil samples analyzed with one exception. Arsenic was detected in sample FL252-B1-0-1.5 at a concentration of 28 mg/kg which is greater than the MTCA Method A cleanup level of 20 mg/kg.

Petroleum hydrocarbons, cPAHs and metals which were detected in samples from FL252-B1, FL252-B3 and FL252-B4, are common contaminants associated with fill of unknown origin.

Shallow soil impacts may also be related to former or current facility operations (e.g., impacts from runoff and/or truck and trailer storage and maintenance activities).

Groundwater

The depth to groundwater in monitoring well FL252-B2 was 25.6 feet below the well casing rim (measured on June 1, 2018). Petroleum hydrocarbons, priority pollutant metals, cyanide, VOCs and SVOCs were not detected in the groundwater sample collected from FL252-B2. The compound bis(2-ethylhexyl) phthalate identified in the regulatory files as a residual contaminant associated with Widing was not detected in the Focused Phase II ESA groundwater samples.

Tacoma Smelter Plume

Detected arsenic and lead concentrations in the 8 samples collected for the purpose of evaluating TSP impacts were less than respective MTCA Method A cleanup levels (20 mg/kg for arsenic and 250 mg/kg for lead). Residual impacts from the Tacoma Smelter Plume do not appear to be a concern based on the results for arsenic and lead in 8 near surface soil samples (GeoEngineers 2018).

3 PROPOSED ENVIRONMENTAL CONDITION ASSESSMENT PLAN

Ecology VCP provided an Opinion Letter based on a review of past Subject Property investigation reports. The Ecology VCP Opinion letter presented the following recommendations with regard to current data gaps with the environmental characterization of the Subject Property.

3.1 FORMER MAINTENANCE GARAGE GROUNDWATER

Ecology requested further delineation of chlorinated volatile organic compounds (CVOCs) contamination to the Subject property, particularly in the area of the former maintenance garage.

Spectrum proposes to assess the CVOCs impact on the Subject Property groundwater in two phases of work.

The initial phase of work will consist of collecting grab groundwater samples from the groundwater table. A series of borings will be placed in a general south-southwest direction from the south edge of the former maintenance building cleaning pad. The borings will be drilled to a depth of ten feet below the top of the groundwater table. Grab groundwater samples will be collected and analyzed for CVOCs.

The second phase of work will consist of installing three to four groundwater monitoring wells to the south-southwest of the former maintenance building in order to characterize CVOCs in this portion of the Subject Property. The groundwater monitoring wells locations will be selected utilizing the results of the initial grab groundwater samples' analytical results.

Spectrum will install three to four groundwater monitoring wells to the south-southwest of the former maintenance building cleaning pad. A hollow-stem auger drill rig will be used to drill the well borings. The groundwater monitoring wells will have a minimum of ten-foot screens and a maximum depth of 45 feet bgs.

3.2 SETTLING PONDS

Three former lagoons (settling ponds), two of which were unlined, were located east of the maintenance garage on the eastern portion of the Subject Property. A SVOC contaminant, bis(2-ethylhexyl) phthalate, was reportedly present in soil beneath the lagoons. More than

900 tons of contaminated soil and sludge that were classified as Dangerous Waste were reportedly removed from the lagoon area in 1988. The excavated lagoons were reportedly filled with clean fill. However, post-excavation groundwater sampling was not performed in this area.

Spectrum will install a groundwater monitoring well to the south-southwest of the former unlined settling ponds. A hollow-stem auger drill rig will be used to drill the well boring. The groundwater monitoring well will have a ten-foot screen and a maximum depth of 45 feet bgs. A groundwater sample will be collected from this well and analyzed for SVOCs and VOCs.

3.3 SURFACE WATER PROTECTION.

A drainage ditch is present along the northern property boundary. The potential impact of metals on surface water in the ditch must be assessed.

Spectrum will collect a soil sample from the ditch and analyze the sample for total metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver) using EPA test method 6020B.

3.4 SHALLOW SOIL INVESTIGATION ACROSS THE PROPERTY

The Subject Property is located within the boundary of the Tacoma Smelter Plume King County facility (facility site ID 66948686, Cleanup site ID 2123). Ecology's Dirt Alert map predicts the arsenic concentration at surface soil in this area to be 40 to 100 milligrams per kilogram (mg/kg). Spectrum will conduct a soil characterization assessment that will be compliant with Ecology's 2019 Tacoma Smelter Plume Model Remedies Guidance.

The site will be divided into four distinct quadrants to test the shallow site soils for arsenic. Spectrum will advance 10 hand auger borings to a maximum depth of 2 feet and in a general grid pattern across each quadrant of the site for a total of 40 samples. Ten soil samples will also be analyzed for cPAHs.

3.5 SOUND TRANSIT EASEMENT CONTAMINATION

Spectrum will contact Sound Transit and determine if the VOCs, SVOCs (including phenols), PAHs, and priority pollutant metals issues within the Sound Transit easement in the east portion of the Subject Property have been addressed by Sound Transit.

4 FINAL REPORT

Spectrum will prepare a written Final Report detailing our field observations, Subject Property work, analytical results, conclusions, and recommendations.

5 SCHEDULE

Spectrum anticipates that fieldwork for the proposed Environmental Condition Assessment Plan will take place following attainment of approval of this Environmental Condition Assessment Plan by Ecology VCP.

6 REFERENCES

Shannon & Wilson 2025. Results Of Phase II Environmental Site Assessment, Xtra Lease Kent, 24300 Pacific Highway South, Kent, Washington 98032. Shannon & Wilson Project Number 112995-002.

GeoEngineers 2018. AE 0044-12 3.7.N Focused Phase II Environmental Site Assessment FL-252 Draft 2. Sound Transit – Federal Way Link Extension. Parcel FL-252, Gresham Transfer/Former Widening Transportation Facility. July 25, 2018.

FIGURES



EXPLANATION

-  GW MONITORING WELL
-  TCLP SAMPLE
-  GRAB GW SAMPLE LOCATION

 INTERPRETED GROUND WATER FLOW DIRECTION

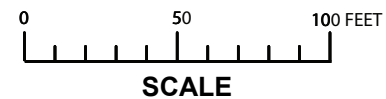


FIGURE 2

CITY PACIFIC LAND CO., LLC.
ENVIRONMENTAL CONDITION
ASSESSMENT PLAN
COMMERCIAL PROPERTY
24300 PACIFIC HIGHWAY SOUTH
KENT, WASHINGTON 98032

SITE PLOT PLAN

GO Spectrum NW, LLC.

April 2026