

**PLACER COUNTY**  
**REDEVELOPMENT AGENCY**

**MEMORANDUM**

**TO:** Honorable Members of the Redevelopment Agency Board  
**FROM:** Thomas M. Miller, Director  
James LoBue, Deputy Director  
**DATE:** February 22, 2011  
**SUBJECT:** Quartz Ridge Family Apartments, L.P., Disposition, Development, and Loan Agreement

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**ACTION REQUESTED**

Conduct a public hearing pursuant to California Health and Safety Code Sections 33431 and 33433 and adopt a resolution (1) approving a 33433 Report and Reuse Appraisal; (2) approving disposition of real property 360 Silver Bend Way, Auburn, APN: 054-171-031, 054-171-032, 054-171-035, 054-171-036, 054-171-037, and 054-171-038 to Quartz Ridge Family Apartments, L.P.; (3) approving a Disposition, Development, and Loan Agreement and related documents with Quartz Ridge Family Apartments, L.P.; (4) authorizing an expenditure of \$2,000,000 in Redevelopment Housing Funds for the Quartz Ridge Family Housing Project (currently known as Miner's Ridge Family Apartments); and (5) authorizing for the Redevelopment Director or his designee to execute the aforementioned agreements and associated documents.

**BACKGROUND**

In 2008, the Redevelopment Agency (Agency) acquired the vacant real property located at 360 Silver Bend Way, Auburn, CA (Site). On May 26, 2009, your Board authorized the Agency to issue a Request for Proposals (RFP) for development of the Site. After receipt of four proposals, a review panel was convened. The review panel participants scored the proposals based on criteria relating to the proponents' demonstrated experience and capability, their demonstrated financial knowledge and access to resources, and the quality of their proposals. The companies that submitted the top two proposals were requested to interview with Agency management staff. Those interviews were conducted on September 3, 2009. The Agency selected USA Properties Fund, Inc's. proposal based on the review panel's scoring, the results of the company interviews, and the proposal's compatibility with the goals of the Agency. USA Properties Fund, Inc. has formed Quartz Ridge Family Apartments, L.P. (Developer), a California limited partnership, to be the developer for this project.

On November 17, 2009, your Board approved an Exclusive Negotiating Rights Agreement and a subsequent Amendment with USA Properties Fund, Inc. for the development of new affordable housing and associated improvements at 360 Silver Bend Way in Auburn. The Developer has since received entitlement approvals for the affordable housing development for the Site from the County. California Environmental Quality Act (CEQA) review is also complete. The project is currently named Miner's Ridge Family Apartments but the developer proposes to change the name to Quartz Ridge Family Apartments after the permits process has been completed.

The Developer is proceeding to apply for Federal Low-Income Housing Tax Credits (Tax Credits) through the State of California Tax Credit Allocation Committee for the Quartz Ridge Family Apartments development. Tax Credits were created by the Tax Reform Act of 1986 as a method of funding housing affordable to low-income households. They are used to leverage private capital and typically finance the bulk of construction costs. The next Tax Credits funding application deadline is March 2011.

In order to qualify for the Tax Credits, the project must have an approved Disposition, Development, and Loan Agreement (DDA) or comparable financing and property disposition commitments. The proposed DDA outlines pledges by the Agency to provide land, funding, and technical assistance for the project. It also details the Developer's obligations to design, build, manage, and maintain the development.

### **Development Description**

The proposed development consists of 64 units, 31 of which will be affordable to low- and very low-income residents and one manager's unit. Although the Agency has restricted 31 units at rents affordable to residents at or below 80% of the Area Median Income (AMI), the Developer has indicated that it intends to restrict the other units at affordable rents to comply with Tax Credit guidelines.

### **Development Team**

Quartz Ridge Family Apartments, L.P. is the developer for the project. USA Construction Management, Inc. will construct the project and USA Multi-family Management, Inc. will serve as the property manager. USA Properties Fund, Inc. (USA) was founded in 1981 and is led by Geoffrey C. Brown, President. USA has worked with over 21 housing and redevelopment agencies throughout California and Nevada. USA came highly recommended by the three local agencies we contacted as references. USA has developed over 9,000 units of family and senior apartments in over 70 communities in California and Nevada.

### **Property Manager**

The project will be professionally managed by USA Multi-family Management, Inc. which is a subsidiary of USA Properties Fund, Inc. USA Multi-family Management was created in 1993 and manages over 70 apartment communities.

### **Tenant Support Services**

USA partners with Riverside Charitable Corporation for tenant support services. LifeSTEPS (Life Skills Training and Education Programs, Inc.) works to strengthen families and communities through education and social service programs.

### **Financing Plan**

The project's total cost estimate is \$19,263,847. The Tax Credits application requires all other funding commitments to be in place by the application submittal deadline. Implementation of the project will be contingent on the layering and coordination of multiple funding sources. Following is a description of these sources. A project financing Sources and Uses Table is also provided as an attachment.

### **Private Loan**

The project financing plan projects a private bank loan of \$1,600,000 to contribute towards the overall development cost. This loan will be serviced with the rent revenue collected from the project. The amount of the loan will be limited because the rents will be required by the Tax Credits funding agreement to be restricted to levels that are affordable to low- and very low-income residents.

### **Deferred Developer Fee**

Tax Credits regulations provide for Tax Credits proceeds to pay a developer fee up to \$1,400,000. This fee is the Developer's entire payment for the project and is split among the managing and limited partners. Tax Credits regulations allow for a higher developer fee to be paid from other sources. The DDA provides for an additional developer fee up to \$600,000. Of the additional fee \$313,271 will be deferred to be paid to the Developer only if the project realizes net savings at the end of construction and/or in annual operation.

### **Tax Credits Investment**

Tax Credits provide an exemption from Federal income tax for project investors. The financing plan estimates that investors will pay \$14,135,576 to the project to acquire these exemptions. It is the largest single funding source for the project.

### **Agency Gap Financing & Land Loan**

The Agency, with assistance from its development finance consultant Keyser Marston Associates, has engaged in pro forma analysis and financial negotiation with the Developer. At the conclusion of this process the Agency determined that the proposed project has a funding gap of \$2,000,000 after the application of the above described funding sources. The Agency has entered into a predevelopment loan for up to \$350,000 with the Developer. The predevelopment loan amount is included in the \$2,000,000 that is proposed as additional funding for the completion of the project and will be included in the form of a residual receipts loan to the Developer. The Agency will also provide a loan for the purchase of the property based on its current appraised value of one million, two hundred fifteen thousand dollars (\$1,215,000). The loans will be secured by deeds of trust and regulatory agreements on the property.

### **Disposition, Development, and Loan Agreement**

The DDA contains all the terms and conditions relating to the disposition of the property and the design, construction, financing, and operation of the project. It is the legal instrument that governs the relationship between the Agency and Developer until the development is complete.

Basic terms of the DDA stipulate that the Agency will provide to the Developer the property and construction gap financing if, and when, the project has received a Tax Credits award, building permit approvals, full financing, and the project is ready to begin construction. The Developer agrees to comply with the project financing plan and to design, build, and operate the 31 Agency restricted units in accordance with approved entitlement and permit approvals and the financing stipulations of the DDA. In addition, the Developer will continue to manage and operate the housing in good condition for at least 55 years and restrict rents at levels affordable to low- and very low-income residents.

### **33433 Report and Reuse Appraisal and Required Findings**

In accordance with California Community Redevelopment Law (CRL), if tax increment revenue is used directly or indirectly to acquire the property that is the subject of the conveyance, section 33433 of the Health and Safety Code requires that a special report be prepared. The special report, identified in this Board packet as the "33433 Report and Reuse Appraisal", must contain the cost of the agreement to the Agency, the estimated value of the interest to be conveyed, and an analysis of why the sale will assist in the elimination of blight. The Agency had Keyser Marston Associates prepare a 33433 Report and Reuse Appraisal (see attached) to determine the market value of the property to be conveyed to the Developer in consideration of the requirements and rent restrictions of the affordable housing project. CRL requires that the Board of Supervisors and the Agency Board conduct public hearings and consider the reports before the Agency takes action to adopt a DDA that would authorize conveyance of Agency-owned property to a private party.

The 33433 Report and Reuse Appraisal is consistent with the project Financing Plan in concluding that the project is financially infeasible unless the property is conveyed to the Developer at no cost or as part of a residual receipts loan.

CRL also requires that the legislative body and Agency Board approve certain findings, that the property disposition and implementation of the DDA will assist in: (1) the elimination of blight in the North Auburn Redevelopment Project Area, (2) the action is consistent with redevelopment plan goals for the re-planning, redesign, and development of underutilized or poorly developed areas and (3) provides for the expansion and improvement of housing for low and moderate income persons. The DDA and proposed project will meet the North Auburn Redevelopment Plan and North Auburn Five Year Implementation Plan goals of the removal of blight, improvement of public facilities, and expansion and improvement of housing for low-income persons.

### **FISCAL IMPACT**

The financial feasibility of the project is contingent upon the receipt of Tax Credits from the California Tax Credit Allocation Committee. It is planned for the Developer to apply for Tax Credits in the March 2011 round and awards for this round are scheduled for June 2011.

The proposed \$2,000,000 gap financing which includes a predevelopment loan of \$350,000 and \$1,215,000 Agency land loan contributions for the project are coming from currently available North Auburn Redevelopment Project Area Housing Set-aside funds and Agency housing bond proceeds. The Agency contributions of both land and funding are in the form of residual receipts loans with 55 year terms. There will be no impact to the County General Fund.

### **ENVIRONMENTAL REVIEW**

The actions requested in this item are activities taken in furtherance of the Redevelopment Plan for the North Auburn Redevelopment Project Area, for which an environmental impact report was prepared and certified pursuant to the California Environmental Quality Act (CEQA). Therefore, no further environmental review is required for these actions (CEQA Guidelines Section 15180).

In addition, the development project has undergone all environmental review required by the County and in compliance with CEQA. An addendum to the subsequent mitigated negative declaration was prepared for this development proposal by the County pursuant to CEQA and was certified as document PMUP 20100029 on May 13, 2010. Specific findings and mitigation measures shall be implemented with the project as described in the Notice of Determination filed with the State on August 14, 2010.

Attachments: Resolution  
Project Site Map  
Project Financing Sources and Uses Table  
Disposition, Development, and Loan Agreement  
33433 Report and Reuse Appraisal

Project Site Map; Project Financing Sources and Uses Table; Disposition, Development, and Loan Agreement; and 33433 Report and Reuse Appraisal for Review only at the Clerk of the Board

**Exhibit  
Project Site Map**

**Exhibit**  
**Financing Plan - Sources and Uses**

**Exhibit**  
**Disposition, Development, and Loan Agreement**

**Exhibit**  
**33433 Report and Reuse Appraisal**

**Before the Placer County  
Redevelopment Agency Board of Directors  
County of Placer, State of California**

In the matter of:

Approving a Reuse Report required by California Health and Safety Code Section 33433; authorizing the execution of a Disposition, Development, and Loan Agreement for the sale of real property to Quartz Ridge Family Apartments, L.P.; adopting findings in connection with such sale; approving financing for the Quartz Ridge Family Apartments Project; and authorizing the execution of all necessary documents in connection with these approvals by the Redevelopment Director or designee

Resol. No: .....

Ord. No: .....

First Reading: .....

The following Resolution was duly passed by the Redevelopment Agency Board of the County of Placer at a regular meeting held \_\_\_\_\_,

by the following vote on roll call:

Ayes:

Noes:

Absent:

Signed and approved by me after its passage.

Attest:  
Clerk of said Board

\_\_\_\_\_  
Chair, Agency Board

WHEREAS, the Placer County Redevelopment Agency (Agency) is a redevelopment agency formed, existing, and exercising its powers pursuant to California Community Redevelopment Law, Health and Safety Code (HSC) Section 33000 *et seq.*;

WHEREAS, by Ordinance No. 4832-B, adopted on June 24, 1997, the Placer County Board of Supervisors (Board of Supervisors) established the North Auburn Redevelopment Project Area (Project Area) and adopted the Redevelopment Plan for the Project Area (as subsequently amended, the Redevelopment Plan);

WHEREAS, pursuant to an Exclusive Negotiating Rights Agreement by and between the Agency and USA Properties Fund, Inc., a California corporation, dated November 17, 2009, and subsequently amended, Agency staff has negotiated the terms and conditions under which Quartz Ridge Family Apartments, L.P., a California limited partnership (Developer), would acquire the following real property from the Agency: 360 Silver Bend Way, (the Property) APN: 054-171-031, 054-171-032, 054-171-035, 054-171-036, 054-171-037, and 054-171-038 for development of the Quartz Ridge Housing Project, a 64-unit, multi-family housing development in which at least 31 residential units will be affordable to low- and very low-income households, together with one (1) manager's unit, common laundry facilities, recreational space, 132 parking spaces, and approximately 2,600 square feet of common area tenant services space (Housing Project);

WHEREAS, the Housing Project, the Property, and the terms and conditions for development and financing of the Housing Project are more particularly described in the Disposition, Development, and Loan Agreement (DDA), copies of which have been provided to the Agency Board and the Board of Supervisors;

WHEREAS, the actions requested in this item are activities taken in furtherance of the Redevelopment Plan for the Project Area, for which an environmental impact report was prepared and certified pursuant to the California Environmental Quality Act (CEQA) and, therefore, no further environmental review is required for these actions (CEQA Guidelines Section 15180);

WHEREAS, with respect to the Housing Project, the County of Placer has adopted an addendum to the previously adopted mitigated negative declaration in compliance with CEQA;

WHEREAS, HSC Sections 33430 and 33431 provide that a redevelopment agency may sell property without public bidding provided the agency holds a public hearing following publication of notice;

WHEREAS, HSC Section 33433 provides that prior to a redevelopment agency's sale of property acquired with tax increment funds (i) the agency must prepare and make available to the public a report (Reuse Report) describing the terms of the sale and development of the property, (ii) the legislative body must hold a public hearing following notice, and (iii) the legislative body must approve the conveyance by a resolution adopting specified findings;

WHEREAS, the Agency has caused a reuse report, entitled the "33433 Report and Reuse Appraisal" to be prepared;

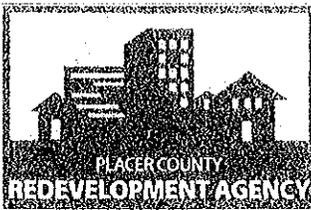
WHEREAS, the Agency has caused notice to be published and have conducted public hearings in accordance with all legal requirements;

WHEREAS, the 33433 Report and Reuse Appraisal contains all necessary elements to comply with California Community Redevelopment Law (CRL) Section 33433; and

WHEREAS, the Developer and Agency have negotiated an Affordable Housing Regulatory Agreement (Regulatory Agreement) which restricts residential rents in the Housing Project at affordable levels for a period of 55 years.

NOW, THEREFORE, BE IT RESOLVED, that the Agency,

1. Finds that the sale and development of the Property in accordance with the DDA will assist in the elimination of blight in the Project Area, will facilitate the development of housing for low- and very low-income households, will further the goals of the Redevelopment Plan, and will be consistent with the implementation plan adopted in connection therewith.
2. Finds that the consideration to be paid for the purchase of the Property is not less than the fair reuse value of the Property at the use and with the covenants and conditions imposed by the DDA and the Regulatory Agreement.
3. Finds that the 33433 Report and Reuse Appraisal contains all necessary elements to comply with CRL 33433 and more specifically finds that:
  - a. The sale price for the Property will be the fair reuse value;
  - b. The proposed Agency financing for the Project includes (i) seller financing in the form of a residual receipts, deferred payment loan in the amount of the current appraised value of \$1,215,000, and (ii) a pre-development/construction/permanent loan in the maximum amount of \$2,000,000 for a total loan of \$3,215,000 (Development Loan);
4. Based on the above findings, the Agency Board:
  - a. Approves the 33433 Report and Reuse Appraisal;
  - b. Approves the sale of the Property to the Developer and provision of the Land Loan and Development Loan pursuant to the terms and conditions set forth in the DDA;
  - c. Approves the DDA and the Regulatory Agreement, authorizes the Agency Director or his designee to execute and deliver the DDA and the Regulatory Agreement substantially in the forms on file with the Agency Secretary, and authorizes the recordation of a Memorandum of the DDA in the Official Records of Placer County;
  - d. Authorizes the Agency Director or designee to execute and deliver such other instruments and to take such other actions as necessary to carry out the intent of this Resolution; and
  - e. Authorizes the expenditure of \$2,000,000 of North Auburn Redevelopment Project Area tax increment housing set-aside funds for the Quartz Ridge Housing Project.



Thomas M. Miller, Director

Jim LoBue, Deputy Director  
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Auburn, California 95603  
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FAX: 530-745-3152  
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**TO:** Honorable Members of the Redevelopment Agency Board  
**FROM:** Thomas M. Miller, Director  
James LoBue, Deputy Director *James LoBue*  
**DATE:** February 18, 2011  
**SUBJECT:** Information on the Quartz Ridge Family Apartments Project

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At the February 22, 2011 meeting your Board will consider a proposed Disposition, Development and Loan Agreement with Quartz Ridge Family Apartments, L.P. and related actions for a proposed housing development project at 360 Silver Bend Way in Bowman. Since acquiring the property in 2008, the Agency has worked diligently with the developer, County Environmental Health and all other involved agencies to clean up the site and prepare for a high quality new housing development. Included in the work has been extensive study and analysis of the site to determine whether it contains any contamination and is suitable for new development. A series of tests and studies were performed and reviewed by County Environmental Health prior to action being taken by the Planning Commission and your Board to approve entitlements for the project.

Since that time, and in compliance with recommendations by Environmental Health, additional soil tests have been conducted and a report prepared by technical consultants Krazan and Associates, Inc. Environmental Health has reviewed the report and this morning our office received the attached review letter from Environmental Health. The letter gives an assessment and recommendations for future action that are consistent with the information and recommendations provided at the time of the project approval. Of note is a statement from the letter: "Based on the results of the limited soil sampling, Krazan concludes that there does not appear to be significant threat to human health within the native orchard area and background soils. PCEH concurs with this conclusion."

It is known that the site contains a significant amount of fill material. The Agency and developer plan to continue to coordinate closely with Environmental Health to test fill material before it is exported and disposed of in appropriate disposal facilities, test and confirm the safety of import material before it is deposited and compacted on site, and confirm the overall safety of the site before building construction begins. The Krazan technical report is available for public review at the office of the Redevelopment Agency at 3091 County Center Drive, Auburn.

Attachment: Environmental Health Letter dated February 17, 2011



# Placer County Health and Human Services Department

Richard J. Burton, M.D., M.P.H.  
Health Officer and Director

Jill Pahl, R.E.H.S.  
Director, Environmental Health

February 17, 2011



USA Properties Fund, Inc.  
Attn. Ms. Royce Sanders  
2440 Professional Drive, Suite 100  
Roseville, CA 95661

RE: Quartz Ridge (Formerly Miners Ridge), 360 Silver Bend Way, Assessor Parcel Numbers (APNs) 054-171-031, 032, 035, 036, 037 and 038, Auburn, CA.

Dear Ms. Sanders:

Placer County Environmental Health (PCEH) has reviewed the *Limited Soil Assessment*, dated January 11, 2011, prepared by Krazan & Associates, Inc. (Krazan), for the proposed Quartz Ridge Multi-Family project (formerly Miners Ridge) located at 320 Silver Bend Way in Auburn, California (the Site). The Site consists of six undeveloped parcels that form a 6.18 acre area. The Site is currently undeveloped and was formerly used as an orchard and a private residence. A significant amount of undocumented fill is located in the central portion of the Site. In response to a PCEH memorandum dated April 10, 2010 and meeting held on April 23, 2010, Krazan prepared the *Workplan for Limited Soil Assessment (Work Plan)*, dated May 13, 2010. The *Work Plan* was conditionally approved by PCEH in a May 26, 2010 letter. Krazan provided the *Draft Limited Soil Assessment* dated September 1, 2010. PCEH responded to the *Draft Limited Soil Assessment* in a letter dated October 27, 2010. Krazan submitted the *Response to PCEH Comments* dated December 9, 2010. Following review of the *Response to PCEH Comments*, PCEH requested that the comments be incorporated into the soil assessment report and that a final report be submitted to PCEH for review and comment.

As summarized above, PCEH requested the development of a soil sampling plan to address potential chemical impacts for the two areas of the Site, the imported fill area and the area where the "native" orchard surface exists. The *Limited Soil Assessment* presents the results of soil analytical data collected from 29 soil borings performed at the Site. Soil sampling at the Site was focused on two areas, the import fill material and the native orchard surface. Results of each will be discussed below.

#### Import Fill Material:

- Initial information provided by Krazan indicated the volume of import fill material at approximately 7,500 cubic yards. However, in a letter dated December 27, 2010, Krazan reported that the estimated volume of existing import fill is 36,000 cubic yards. The import fill material is reported to contain concrete and asphalt.
- Total petroleum hydrocarbons as gasoline, volatile organic compounds and semi-volatile compounds were not reported above their respective laboratory reporting limits for any of the samples collected from the import fill material.
- Total petroleum hydrocarbons as diesel (TPHd) was initially reported for several samples collected from within the import fill material. Upon further review of the laboratory data, the data was revised to differentiate between TPHd and total petroleum hydrocarbons as motor oil (TPHmo). Based on this revision, all of the samples collected from the import fill material were below the residential San Francisco Bay Regional Water Quality Control Board Environmental Screening Level (ESL) for TPH (middle distillates). However, five of the samples contained TPHmo results greater than the ESL for TPH (residual fuels). It is likely that the reported TPHmo results are due to the presence of asphalt debris within the import fill material.
- DDE, a derivative of DDT, was reported for three of the soil samples collected from the import fill material. However, each of these results was below the residential California Human Health Screening Level (CHHSL) for DDE.

Perspective, Hope, and Opportunity

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- Arsenic was reported at concentrations ranging from 1.7 to 6 milligrams per kilogram (mg/kg). These concentrations are within the range of regional background.
- Total chromium results ranged from 38 to 740 mg/kg. A screening level for total chromium does not exist in the United States Environmental Protection Agency Regional Screening Levels (RSLs), ESLs or CHHSLs. Each of these screening documents provides specific screening levels for chromium III and chromium VI. Krazan subsequently analyzed the three samples with the highest total chromium results for chromium VI. Chromium VI was not reported above the laboratory reporting limit of 8.0 mg/kg. However, these samples were analyzed 90 days out of hold time.
- Cobalt was reported with some concentrations above RSL and ESL residential screening levels but did not appear above background concentrations and were reported below the residential CHHSL.
- Nickel was reported with elevated concentrations within the import fill material when compared to native and background concentrations. However, the concentrations were below the residential CHHSL.
- Vanadium was reported with some concentrations above RSL and ESL residential screening levels but was not reported above the residential CHHSL.

Native Orchard Surface:

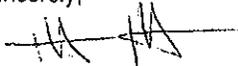
- Pesticides and herbicides were not reported above their respective laboratory reporting limit for the six native orchard surface samples analyzed.
- Arsenic was reported at concentrations ranging from 0.72 to 8.1 mg/kg (excluding samples SB-29 and SB-30). Samples SB-29 and SB-30 were collected along the eastern edge of the Site on the border of the adjacent property which did not have historic orchard activities and it is unclear whether these samples represent the orchard area or a background condition. Therefore, these two samples were not included in the PCEH review. The concentrations from the samples collected within the native orchard surface are within the range of regional background.
- Cobalt was reported with some concentrations above RSL and ESL residential screening levels but did not appear above background concentrations and were reported below the residential CHHSL.
- Vanadium was reported with some concentrations above RSL and ESL residential screening levels but were not reported above the residential CHHSL.

Based on the results of the limited soil sampling, Krazan concludes that there does not appear to be significant threat to human health within the native orchard area and background soils. PCEH concurs with this conclusion.

Krazan further concludes that based on a review of concentrations reported in the import fill material at the Site, the potential for threats to human health from potential exposure to contaminants of concern, including TPHmo, nickel and chromium exist. PCEH concurs with this conclusion. To address this potential issue, Krazan recommends excavation and physical screening of all import fill material (approximately 36,000 cubic yards) to remove concrete and asphalt debris (the likely source of TPHmo detections). Following screening of the import fill material and prior to placement, import fill material will be sampled in accordance with the California Department of Toxic Substances Control "Information Advisory, Clean Import Fill Material" guidance to assure concentrations remaining are protective to human health. Prior to approval of Improvement Plans, a soil management plan shall be submitted for review to PCEH for review and approval. The soil management plan should include (at a minimum) the sampling and analytical methods, proposed soil screening levels, and a contingency plan for any potentially impacted material that may be encountered during construction activities that is not suitable for reuse on the Site. Sampling for chromium should include analyses for chromium III and chromium VI specifically so comparisons to published screening levels can be made. Additionally, if import fill material will be needed for the project, sampling of this material should be addressed in the soil management plan.

If you have any questions on the contents of this letter, please contact me at (530) 745-2357.

Sincerely,



West Bourgault, P.G.  
Placer County Environmental Health

cc: Cathy Donovan, Placer County Redevelopment Agency  
Frank Stott, Krazan & Associates, Inc.  
Maria Gillette, California Department of Toxic Substances Control