

Phase I ESA Report

Proposed Citizens Imperial Solar Farm

APN's 025-260-024 & 025-280-003

Calipatria, California

Prepared for:

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Engineering And
Information Technology

March 14, 2018

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**Phase I Environmental Site Assessment Report
Citizens Imperial Solar Farm
E. Simpson and E. Highline Canal Roads
(APN's 025-260-024 and 025-280-003)
Calipatria, California
GSL Report No. GS1806**

Dear Ms. Kosciak:



We have performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM E1527-13 of the subject properties located north and south of E. Simpson Road at E. Highline Canal Road (APN 025-260-024 and 025-280-003) approximately 6.0 miles northeast of Calipatria, California. Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report. **This assessment has revealed the following “de minimus” environmental conditions in connection with the property:**

- Pesticide residues (low concentrations) typical to agricultural crop applications may be present in the near surface soils.
- Asbestos may be present in concrete lining for old irrigation ditches and some scattered concrete irrigation pipe.



We declare that, to the best of our professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in §312.10 of 40 CFR §312 and we have the specific qualifications based on education, training and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Attached is our report which describes the procedures used and results of the assessment. If you have any questions or require additional information, please do not hesitate to contact the undersigned at (760) 337-1100. We appreciate the opportunity to provide our professional review for this site.

Respectfully Submitted,
GS Lyon Consultants, Inc.



Jeffrey O. Lyon, P.E.
Principal Engineer



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Distribution:
Client (4)

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1.0 INTRODUCTION

1.1 Purpose

GS Lyon Consultants, Inc. was retained by Citizens Enterprises Corporation to conduct a Phase I Environmental Site Assessment (ESA) for the Property (herein referred to as the subject property or subject site in this Phase I ESA Report) as a prerequisite to property transaction (purchase, sale, refinance, project entitlement, etc.). The subject land parcels are located north and south of E. Simpson Road at E. Highline Canal Road approximately 6.0 miles northeast of Calipatria, California (See Figure 1 for a Vicinity Map of the subject property).

The purpose of this Phase I Environmental Site Assessment (ESA) is to identify, to the extent feasible, recognized environmental conditions (RECs) associated with past and present activities on the subject site or in the immediate site vicinity in general conformance to ASTM Standard E-1527-13 “*Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*” that may affect future uses of the subject property.

This report is intended to satisfy the Phase I ESA portion of “*all appropriate inquiry*” into the previous ownership and uses of the subject site as defined under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) at Title 42 of the United States Code (U.S.C.) §9601(35)(B) and in accordance with 40 Code of Federal Regulations (CFR) Part 312, Standards and Practices for All Appropriate Inquiries; Final Rule (AAI Rule).

1.2 Scope of Services

The scope of work for this ESA is in general accordance with the requirements of ASTM Standard E 1527-13. This assessment included:

- Reconnaissance of the subject properties and adjacent properties
- Review user-provided information
- Interviews with persons with significant knowledge of the subject properties
- Review of a regulatory database report provided by a third-party vendor
- Review readily-available historical sources (including but not limited to: aerial photographs, fire insurance maps, property tax files, recorded land title records, and topographical maps)
- Prepare report of findings

1.3 Limitations

No Phase I ESA can completely eliminate uncertainty regarding the potential for RECs in connection with a property. Conformance of this assessment with ASTM Standard Practice E 1527-13 is intended to reduce, but not eliminate uncertainty regarding the potential for RECs in connection with the Subject Property. While GS Lyon has made reasonable effort to discover and interpret available historical and current information on the property within the time available, the possibility of undiscovered contamination remains. Our assessment of the site and surrounding areas was conducted in accordance with ASTM guidelines and the *generally accepted environmental engineering standard of practice* which existed in Imperial County, California at the time that the report was prepared. No warranty, express or implied, is made.

GS Lyon Consultants, Inc. derived the data in this report primarily from visual inspections, examination of public records and information in the public domain, informal interviews with individuals, and readily available information about the site. The passage of time, manifestation of latent conditions or occurrence of future events may require further exploration of the site, analysis of the data, and reevaluation of the findings, observations, and conclusions expressed in this report.

The findings, observations, and conclusions expressed by GS Lyon Consultants in this report are not, and should not be considered, an opinion concerning the compliance of any past or present owner or operator of the site with any federal, state or local law or regulation.

This report should not be relied upon after **180 days** from the date of issuance, unless additional services are performed as defined in ASTM E 1527-13 - Section 4.7.

1.4 Deviations or Data Gaps

ASTM Standard E 1527-13 requires any significant data gaps, deviations, and deletions from the ASTM Standard to be identified and addressed in the Phase I ESA. A significant data gap would be one that affected the ability to identify a REC on the subject property or adjacent properties.

Through the course of this assessment, *data failures* or *data gaps* may have been encountered. These failures or gaps, if any, are discussed below. The following provides the opinion of the Environmental Professional as to the significance of the data gaps in terms of defining *recognized environmental conditions* at the subject site. Data failures may or may not be significant data gaps, and the discussion also provides information pertaining to whether the data failures resulted in significant data gaps.

1.4.1 Data Failures

Data failure is a failure to achieve the historical (property use) research objectives specified in the ASTM Standard Practice even after reviewing the eight standard historical sources that are reasonably ascertainable and likely to be useful. Data failure is one type of data gap.

No *data failures* were encountered during this investigation.

1.4.2 Data Gaps

A *data gap* is a lack of or inability to obtain information required by the ASTM Standard Practice, despite good faith efforts by the Environmental Professional (EP) to gather such information. This could include any component of the Practice, e.g., standard environmental records, interviews, or a complete reconnaissance. A data gap by itself is not inherently significant, but if other information and/or the EP's experience raises reasonable concerns about the gap, it may be judged to be significant.

Due to the location of the subject properties, Sanborn Fire Insurance maps were not available for the subject property. Because there is no historical data or physical indications that the properties have ever been developed or occupied by a business that would have produced hazardous materials, the lack of Sanborn Fire Insurance maps is not considered a significant data gap.

Aerial photographs and other historical records were not available at 5 year intervals as required under the ASTM E 1527-13 standard. This resulted in a data gap for years that records were not available regarding the area of the subject site. However, based upon other historical information reviewed, the subject sites have been vacant desert land or agricultural fields. Therefore, this data gap is not considered to be significant.

1.5 Significant Assumptions

In preparing this report, GS Lyon Consultants, Inc. has relied upon and presumed accurate certain information (or the absence thereof) about the subject properties and adjacent properties by governmental officials and agencies, the Client, and others identified herein. Except as otherwise stated in the report, GS Lyon Consultants has not attempted to verify the accuracy or completeness of any such information.

1.6 User Reliance

This report has been prepared on behalf of and for the exclusive use of Citizens Enterprises Corporation for the particular subject land parcels identified in this report and is subject to

and issued in connection with the referenced Agreement and the provisions thereof. This report should not be relied upon by any party other than the client, its legal counsel, and financial institution without the express permission of GS Lyon Consultants, Inc. Any reliance on this report by other parties shall be at such party's sole risk. Any future consultation or provision of services to third parties related to the subject property requires written authorization from Citizens Enterprises Corporation or their representatives. Any such services may be provided at GS Lyon Consultants sole discretion and under terms and conditions acceptable to GS Lyon Consultants, including potential additional compensation.

2.0 SITE DESCRIPTION

2.1 Site Location and Legal Description

The subject site is located north and south of E. Simpson Road at the E. Highline Canal (APN 025-260-024 and 025-280-003) approximately 6.0 miles northeast of Calipatria in Imperial County, California. The site location is depicted on Plate 1, Vicinity Map.

2.2 Current Property Use and Description

The subject site currently consists of two separate parcels totaling an estimated 209 acres. The northern parcel is irregular in shape located at the northwest corner of Simpson Road and the Imperial Irrigation Districts (IID's) East Highline Canal. This northern subject property has a 230 kV electrical substation (Midway Substation), owned and operated by the Imperial Irrigation District, at the southeast corner and is bound by the IID's 'M' and 'N' Laterals (earthen lined irrigation supply canals).

The southern parcel is irregular in shape with the southwest corner located one mile east of the Wiest and Merkley Road intersection and consists of two fallowed agricultural fields. This southern subject property is bounded by the Imperial Irrigation Districts (IID's) 'L' Lateral (irrigation supply canal) on the south, 'M' Lateral on the north and the East Highline Canal diagonally along the east.

2.3 Adjoining Property Use

The subject site is located within a rural agricultural area of northeastern Imperial Valley approximately 6.0 miles northeast of Calipatria, California. Adjacent properties consist of agricultural fields and citrus orchards, the IID's East Highline Canal and a farm shop (P&T Enterprises) located south across the 'M' Lateral from the southwest corner of the northern subject property. Further from the subject properties are an existing solar farm (PV panels) located 0.67 miles southwest of the subject site, the Calipatria State Prison located 2.7 miles southwest of the southwest corner of the southern subject site and another farm shop with hay compress, hay storage yard and above ground fuel tanks (Aldahara Farms) located 1.0 mile southwest from the southwest corner of the southern subject property.

2.4 Physical Site Characteristics

Topography: Topographic maps (USGS 7.5 minute Iris, CA Quadrangle) indicate that the site elevation is approximately 50 feet below mean sea level (MSL) or elevation 950 (local datum). The Imperial Irrigation District, which supplies power and raw (irrigation) water to the area, established local datum by equating mean sea level to El. 1000.00 feet.

Geologic Setting: The site is located in the Colorado Desert Physiographic province of southern California. The dominant feature of the Colorado Desert province is the Salton Trough, a geologic structural depression resulting from large-scale regional faulting. The trough is bounded on the northeast by the San Andreas Fault and the southwest by faults of the San Jacinto Fault Zone. The Salton Trough represents northward extension of the Gulf of California, which has experienced continual in-filling with both marine and non-marine sediments since the Miocene Epoch (25 million years before present). The tectonic activity that formed the trough continues at a high rate as evidenced by deformed young sedimentary deposits and high levels of historic seismicity.

The site is directly underlain by Holocene (0-11,000 years before present) Cahuilla Lake sediments, which consist of interbedded lenticular and tabular sand, silt, and clay. The predominant surface soil is silty clay. The Holocene lake deposits are considered to be less than 100 feet thick and are characterized by surficial clay and silt deposits with varying amounts of fine sand. The topography of the Imperial Valley is relatively flat, with few significant land features. The valley floor slopes gently to the north (less than 0.5 percent) from an elevation of sea level at Calexico to approximately 225 feet below sea level at the Salton Sea.

Soil Conditions: The U. S. Soil Conservation Service compiled a map of surface soil conditions based on a thirteen-year study from 1962-1975. The Soil Survey maps were published in 1981 and indicate that surficial deposits at the site and surrounding area. The subject sites consists predominantly of gravely sand and very fine grain sands of the Niland and Meloland soil groups (see Appendix B). These loams are formed in sediment and alluvium of mixed origin (Colorado River overflows and fresh-water lake-bed sediments). Based on Unified Soil Classification System presented in the Soils Survey Report, the permeability of the silty clay soils is expected to be low, while the areas with sandy soils will see high permeability.

Groundwater Conditions: The groundwater in the site area is brackish and is typically encountered at a depth of 8 to 12 feet below the ground surface. Depth to groundwater may fluctuate due to localized geologic conditions, precipitation, irrigation, drainage and construction practices in the region. Based on the regional topography, groundwater flow is assumed to be generally towards the southwest within the site area. Flow directions may also vary locally in the vicinity of the site.

3.0 USER PROVIDED INFORMATION

In order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the *Brownfields Amendments*), the *User* must provide the following information (if available) to the *environmental professional*. Failure to provide this information could result in a determination that *all appropriate inquiry* is not complete. The user was asked to provide information or knowledge of the following:

- Environmental cleanup liens that are filed or recorded against the site.
- Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry.
- Specialized knowledge or experience of the person seeking to qualify for the LLPs.
- Relationship of the purchase price to the fair market value of the *property* if it were not contaminated.
- Commonly known or *reasonably ascertainable* information about the *property*.
- The degree of obviousness of the presence or likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate investigation.
- The reason for preparation of this Phase I ESA.

A user questionnaire was provided to the land owner (Imperial Irrigation District) to aid in gathering information that may be pertinent to the evaluation of the subject site for environmental conditions. The completed user questionnaire is provided in Appendix I.

3.1 Title Records

GS Lyon was provided with preliminary title records for review as part of this assessment. Title records are provided in Appendix I

3.2 Environmental Liens or Activity and Use Limitations

An environmental lien is a charge, security, or encumbrance upon the title to a property to secure the payment of a cost, damage, debt, obligation, or duty arising out of response actions, cleanup, or other remediation of hazardous substances or petroleum products upon the property. According to the user questionnaire, the property owner is not aware of any Environmental Liens or Activity and Use Limitations associated with the subject site that have been filed or recorded under federal, tribal, state or local law (Appendix G).

3.3 Specialized Knowledge

According to the User Questionnaire, Harold Walk, is the land manager/real estate supervisor for the landowner (Imperial Irrigation District) and; therefore, has specialized knowledge or experience associated with the subject site and nearby properties.

GS Lyon has no personal knowledge of the subject site.

3.4 Commonly Known or Reasonable Ascertainable Information

No information was provided by the Client regarding any commonly known or reasonably ascertainable information within the local community that is material to RECs in connection with the subject property.

3.5 Valuation Reduction for Environmental Issues

The owner indicated that the lease price of this property reasonably reflects the fair market value of the property with no discounts for environmental issues.

3.6 Owner, Property Manager, and Occupant Information

The current owner of the subject properties is Imperial Irrigation District. The site is currently agricultural use land and or fallowed.

Name: Imperial Irrigation District
Address: 1699 W. Main Street, Ste. F
El Centro, CA 92243

3.7 Previous Reports and Other Provided Documentation

No previous reports or other pertinent documentation was provided to GS Lyon for review during the course of this assessment.

4.0 RECORDS REVIEW

A review of historic aerial photographs (Appendix C), historic topographic maps (Appendix D), historic Sanborn Fire Insurance maps (Appendix E), governmental regulatory databases (Appendix F), other regulatory and agency databases (Appendix G) was performed to evaluate potentially adverse environmental conditions resulting from previous ownership and uses of the site. The details of the review are presented in Sections 4.1 through 4.3 of this report.

4.1 Regulatory Database Review

4.1.1 Standard Environmental Record Sources

GS Lyon Consultants contracted Environmental Data Resources, Inc. (EDR) of Shelton, Connecticut which queries and maintains comprehensive environmental databases and historical information, including proprietary databases, aerial photography, topographic maps, Sanborn Maps, and city directories to generate a compilation of Federal, State and Tribal regulatory lists containing information regarding hazardous materials occurrences on or within the prescribed radii of ASTM Practice E 1527-13. The search of each database was conducted using the approximate minimum search distances from the subject property defined by the Standard. The purpose of the records review is to obtain and review *reasonably ascertainable* records that will help identify *recognized environmental conditions* or *historical recognized environmental conditions* in connection with the subject site.

EDR's Phase I ESA search package was ordered and performed on February 21, 2018. The search package included: EDR Radius Map Report with GeoCheck, Sanborn maps, historical topo, city directory report and aerial photographs.

The results of EDR's search were used to evaluate if the subject property and/or properties within prescribed search distances are listed as having a past or present record of actual or potential environmental impact. Inclusion of a property in a government database list does not necessarily indicate that the property has an environmental problem.

The following is a brief synopsis of sites identified in the EDR Radius Map Report. The government record search report is included in its entirety in Appendix F.

Federal NPL List

The Environmental Protection Agency's (EPA) National Priorities List (NPL) of uncontrolled or abandoned hazardous waste sites was reviewed for risk sites within a 1 mile radius of the subject site. The NPL identifies sites for priority cleanup and long-term care of properties under the Superfund Program that are contaminated with hazardous

substances.

The database search did not identify any NPL sites within 1 mile of the subject site.

Federal CERCLIS List

The EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) listings were reviewed to determine if risks sites within ½ mile are listed for investigation. The CERCLIS database identifies hazardous waste sites that are on or proposed to be included in the NPL and sites that require investigation and possible remedial action to mitigate potential negative impacts on human health or the environment.

The CERCLIS database search did not identify any risk sites within 0.5 mile of the subject site.

Federal CERCLIS – No Further Remedial Action Planned

The EPA's CERCLIS – No Further Remedial Action Planned (NFRAP) database was reviewed to determine if risks sites within ½ mile are listed. CERCLIS NFRAP site are risk sites that have been removed from and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at the site has been completed and the EPA has determined that no further steps will be taken to list this site on the NPL, unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time.

This designation is for sites where no contamination was found, contamination was quickly removed without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration.

The CERCLIS – NFRAP database search did not identify any risk sites within ½mile of the subject site.

Federal RCRA List

The Federal Resource Conservation Recovery Act (RCRA) Notifiers List was reviewed to determine if RCRA treatment, storage or disposal sites (TSD) are located within 1 mile of the subject site. The RCRA Correction Action Sites List (CORRACTS) is maintained for risk sites which are undergoing "a corrective action". A corrective action order is issued when there has been a release of hazardous waste constituents into the environment from a RCRA facility.

The RCRA and RCRA CORRACTS database searches did not identify any RCRA TSD or RCRA CORRACTS risk sites within ½ mile of the subject site.

Federal ERNS List

The Federal Emergency Response Notification System (ERNS) List was reviewed to determine if reported release of oil and/or hazardous substances occurred on the subject site. The ERNS database searches did not identify any reported releases for the subject site.

State and Tribal NPL List

The Environmental Protection Agency’s (EPA) National Priorities List (NPL) of uncontrolled or abandoned hazardous waste sites was reviewed for risk sites within a 1 mile radius of the subject site. The NPL identifies sites for priority cleanup and long-term care of properties under the Superfund Program that are contaminated with hazardous substances. The database search did not identify any NPL sites within 1 mile of the subject site.

State and Tribal Leaking Underground Storage Tank Sites

The California State Water Resources Control Board (SWRCB) maintains a list of information concerning reported leaking underground storage tanks (LUST). The LUST inventory list was reviewed to determine if any LUSTs are located within ½ mile the subject site. The SWRCB LUST database did not identify any risk sites within ½ mile of the subject site.

State and Tribal Underground Storage Tank Sites

The California State Water Resource Control Board (SWRCB) underground storage tank (UST) inventory list was reviewed to determine if any UST’s are located on or adjacent to the subject site. The SWRCB UST database did not identify any risk sites within ¼ mile of the subject site.

Solid Waste Disposal/Landfill Facilities

The Solid Waste Disposal/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. The data comes from the Integrated Waste Management Board’s Solid Waste Information System (SWIS) database. A review of the SWF/LF list database did not identify any risk sites within ½ mile of the subject site.

Unmapped (Orphan) Sites

Not all sites or facilities identified in the database records can be accurately located in relation to the Subject Property due to incomplete information being supplied to the regulatory agencies and are referred to as “orphan sites” by EDR.

The “Orphan Summary” section of the EDR DataMap Area Study Report identified five (5) orphan sites. Based on a drive-by reconnaissance of the Subject Properties vicinity and review of location and status information provided in the database report, the identified orphan sites are not located within the search radii for databases specified by the Standard.

4.1.2 Additional Environmental Record Sources

California Department of Toxic Substances Control (DTSC) Records – Envirostor Database: EnviroStor is an online search and Geographic Information System tool for identifying sites that have known contamination or sites for which there may be reasons to investigate further. Public Access to EnviroStor is accessible via the DTSC Web Page located at: <http://www.envirostor.dtsc.ca.gov/public/>. The EnviroStor database includes the following site types: Federal Superfund sites (National Priority List); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. The information includes site name, site type, status, address, any restricted use (recorded deed restrictions), past use(s) that caused contamination, potential contaminants of concern, potential environmental media affected, site history, planned and completed activities. The EnviroStor database also contains current and historical information relating to Permitted and Corrective Action facilities. The EnviroStor database includes current and historical information on the following permit-related documents: facility permits; permit renewal applications; permit modifications to an existing permit; closure of hazardous waste management units (HWMUs) or entire facilities; facility corrective action (investigation and/or cleanup); and/or post-closure permits or other required post-closure activities.

The EnviroStor database was queried on March 8, 2018. A map showing the results of the query is provided in Appendix G. No reported cases were found on the subject property. No risk sites were located within ½ mile of the subject property.

California State Water Resources Control Board Records – GeoTracker Database: GeoTracker is a geographic information system (GIS) maintained by the California State Water Resources Control Board (SWRCB) that provides online access to environmental data at <http://www.geotracker.swrcb.ca.gov/>. GeoTracker tracks regulatory data about underground fuel tanks, fuel pipelines, and public drinking water supplies. Site

information from the Spills, Leaks, Investigations, and Cleanups (SLIC) Program is also included in GeoTracker.

The GeoTracker database was queried for environmental data pertaining to the Site on March 8, 2018. A map showing the results of the query is provided in Appendix G. No reported cases were found on the subject property. No risk sites were located within ½ mile of the subject property.

CUPA Records Search: The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of six environmental and emergency response programs. Cal/EPA and other state agencies set the standards for their programs while local governments implement the standards—these local implementing agencies are called Certified Unified Program Agencies (CUPA).

CUPA records indicate the presence of an above ground fuel storage tank, chemical storage facility and hazardous waste generator at SG2 Sonora solar facility located at 7037 Wiest Road. No reports of spills or leaks were identified in the EDR report for this risk site.

CUPA records indicate the presence of an above ground fuel storage tank, chemical storage facility and hazardous waste generator at Aldahara Farms located at the northwest corner of Sinclair and Wiest Road intersection. No reports of spills or leaks were identified in the EDR report for this risk site.

4.2 Historical Use Records

ASTM E1527-13 requires the environmental professional to identify all obvious uses of the property from the present back to the property's first developed use or 1940, whichever is earliest. This information is collected to identify the likelihood that past uses have led to RECs in connection with the property. This task is accomplished by reviewing standard historical sources to the extent that they are necessary, reasonably ascertainable, and likely to be useful. These standard records include aerial photographs, fire insurance maps, property tax files, land title records, topographic maps, city directories, telephone directories, building department records, and zoning/land use records.

The general type of historical use (i.e., commercial, retail, residential, industrial, undeveloped, office) should be identified at 5-year intervals, unless the specific use of the property appears to be unchanged over a period longer than 5 years. The historical research is complete when the use is defined or when data failure occurs. Data failure occurs when

all of the standard historical sources have been reviewed, yet the property use cannot be identified back to its first developed use or to 1940. Data failure is not uncommon in trying to identify the use of the property at 5-year intervals back to first use or 1940, whichever is earlier.

GS Lyon reviewed the following historical records to identify obvious uses of the subject property from the present back to the property’s first developed use, or to 1940, whichever is earlier. The results of this research and data failure, if encountered, are presented in the following sections.

4.2.1 Title Records

GS Lyon was provided with preliminary title records for review as part of this assessment. No liens were found from reviewing the preliminary report, see Appendix I for full report.

4.2.2 Sanborn Fire Insurance Maps

Sanborn Fire Insurance Maps are large scale maps depicting the commercial, industrial, and residential sections of various cities across the United States. Since the primary use of the fire insurance maps was to assess the buildings that were being insured, the existence and location of fuel storage tanks, flammable or other potentially toxic substances, and the nature of businesses are often shown on these maps.

Due to the rural undeveloped nature of the site and vicinity, no Sanborn Fire Insurance Maps were available for this site. A “No Coverage” letter for the Sanborn Fire Insurance Maps is included in Appendix E.

4.2.3 Aerial Photographs

Aerial photographs obtained from Environmental Data Resources (EDR) dating back to 1937 and the Imperial Irrigation District (IID) archives dating back to 1949 were reviewed for historical development of the subject site. Reproductions of the historical aerial photographs reviewed are included in Appendix C.

The 1937 aerial photograph show the subject properties as vacant desert lands.

The 1940, 1948, 1953, 1976 and 1984 aerial photographs are all similar with the subject properties under agricultural cultivation.

The 1992, 1996, 2002 and 2008 aerial photographs are all similar with the southern subject property under agricultural cultivation. The northern subject property was taken out of

agricultural production and a 230 kV electrical substation (Midway Substation) was constructed at the southeast corner of this site between 1984 and 1992.

The 2014 aerial photographs are similar to previous years with both properties fallowed.

4.2.4 Street Directories

City directories are used for locating individuals and businesses in a particular urban or suburban area. City directories are generally divided into three sections: a business index, a list of resident names and addresses, the name and type of businesses (if unclear from the name). While city directory coverage is comprehensive for major cities, it may be spotty for rural and small towns.

Polk City Directories: The Polk City Directories for the years 1963 and 1984 were reviewed. No listings are shown for the subject site.

4.2.5 Historical Telephone Directories

Telephone Directories: Telephone directories for the Imperial County businesses published in 1941, 1955 and 1968 were reviewed. No service stations, chemical manufacturers, petroleum manufacturers, distributors, or automotive repair facilities were noted at or in the immediate vicinity of the site.

4.3 Historical Use Summary

4.3.1 Summary of the Historical Use of Property

Based on a review of the historical information, the southern subject property was first developed prior to 1937 for agricultural use. The subject properties have been fully developed for agricultural use since the late-1940's.

4.3.2 Summary of the Historical Use of Adjacent Properties

Historically, the properties located immediately adjacent to the subject property have been comprised of agricultural lands with scattered rural residential homes, property east of the northern subject site across the Imperial Irrigation Districts East Highline Canal are vacant desert lands. The Calipatria State Prison, southwest of the subject site, was developed in the early 1990's. The PV Solar facility, west of the southern subject site, was developed in the early 2010's.

5.0 SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

A site reconnaissance was performed by Mr. Pete LaBrucherie, a project engineer of GS Lyon, on March 1, 2017. The site visit consisted of a driving the perimeter of the site and randomly crossing the site. The reconnaissance included visual observations of surficial conditions at the site and observation of adjoining properties to the extent that they were visible from public areas. Mr. LaBrucherie was unaccompanied during the site reconnaissance.

The site reconnaissance was limited to visual and/or physical observation of the exterior and interior of the subject property and its improvements, the current uses of the property and adjoining properties, and the current condition of the property. The site visit evaluated the subject property and adjoining properties for potential hazardous materials/waste and petroleum product use, storage, disposal, or accidental release, including the following: presence of tank and drum storage; mechanical or electrical equipment likely to contain liquids; evidence of soil or pavement staining or stressed vegetation; ponds, pits, lagoons, or sumps; suspicious odors; fill and depressions; or any other condition indicative of potential contamination. The site visit did not evaluate the presence of asbestos-containing materials, radon, lead-based paint, mold, indoor air quality, or structural defects, or other non-scope items.

A site reconnaissance can be limited by weather conditions, bodies of water, adjacent buildings, or other obstacles. The weather was warm and sunny and no access limitations were placed on the site visit.

5.2 General Site Setting

The subject site currently consists two separate parcels totaling an estimated 209 acres. The northern parcel is irregular in shape located at the northwest corner of E. Simpson Road and the Imperial Irrigation Districts (IID's) East Highline Canal. This northern parcel has an electrical substation, owned and operated by the Imperial Irrigation District, at the southeast corner with the remaining no longer in agricultural cultivation. This site is bound by the IID's 'M' and 'N' Laterals (earthen lined irrigation supply canals).

The southern parcel is irregular in shape with the southwest corner located one mile east of the Wiest and Merkley Road intersection and consists of two fallowed agricultural fields. This southern parcel is bounded by the IID's 'L' Lateral on the south, 'M' Lateral on the north and East Highline Canal diagonally along the east.

Photographs of the site taken on March 9, 2018 during the site reconnaissance are included in Appendix A.

5.3 Adjacent Properties

The subject site is located within a rural agricultural area of northeastern Imperial Valley approximately 6.0 miles northeast of Calipatria, California. Adjacent properties consist of agricultural fields and citrus orchards, the IID's East Highline Canal and a farm shop (P&T Enterprises) located south across the 'M' Lateral from the southwest corner of the northern subject property. Further from the subject properties are an existing solar farm (PV panels) located 0.67 miles southwest of the subject site, the Calipatria State Prison located 2.7 miles southwest of the southwest corner of the southern subject site and another farm shop with hay compress, hay storage yard and above ground fuel tanks (Aldahara Farms) located 1.0 mile southwest from the southwest corner of the southern subject property.

5.4 Exterior and Interior Observations

The following conditions were specifically assessed for their potential to indicate RECs and may include conditions inside or outside structures on the subject property.

5.4.1 Hazardous Substances and Petroleum Products

GS Lyon did not observe operations that use, treat, store, dispose of, or generate hazardous materials or petroleum products on the subject property. The 230 kV transformer within the fenced Midway Substation is filled with oil. The transformer has a containment wall encompassing the foundation should the transformer leak.

5.4.2 Storage Tanks

Underground Storage Tanks (USTs) – No obvious visual evidence indicating the current presence of USTs (i.e. vent pipes, fill ports, etc.) was noted.

Aboveground Storage Tanks (ASTs) – No obvious visual evidence indicating the historical presence of ASTs (i.e. secondary containments, concrete saddles, etc.) was observed.

5.4.3 Odors

No obvious strong, pungent, or noxious odors were noted during the site reconnaissance.

5.4.4 Pools of Liquid

Pools of liquid were not observed during the site reconnaissance.

5.4.5 Drums and Containers

GS Lyon did not observe drums or storage containers on the subject site.

5.4.6 Unidentified Substance Containers

GS Lyon did not observe open or damaged containers containing unidentified substances at the subject site.

5.4.7 Suspect Polychlorinated Biphenyl (PCB) Containing Equipment

Sealed electrical transformers owned and maintained by the Imperial Irrigation District (IID) are located at the subject site. The IID has replaced all transformers that contained PCB's. No leaks were noted during our site visit. The large transformers(s) within the substation have foundation(s) with containment walls should the transformers leak.

5.5 Interior Observations

The subject property is currently fallowed agricultural ground with the only structure being the electrical substation.

5.5.1 Heating/Cooling

No heating and cooling units are present on the subject site.

5.4.2 Stains or Corrosion

Stains and/or corrosion were not observed.

5.4.3 Drains and Sumps

No drains or sumps were noted on the subject property.

5.6 Exterior Observations

5.6.1 Pits, Ponds, and Lagoons

No pits, ponds, or lagoons were noted on the subject property.

5.6.2 Stained Soils or Pavement

No evidence of significantly stained soil or pavement was noted on the subject property.

5.6.3 Stressed Vegetation

No evidence of stressed vegetation attributed to potential contamination was noted on the subject property.

5.6.4 Solid Waste

No dumpsters or solid waste containers exist on the subject property.

5.6.5 Wastewater

No wastewater is generated onsite. Excess agricultural irrigation water flows into the large earthen drains that border each farm field.

5.6.6 Wells

No evidence of wells (dry wells, drinking water, observation wells, groundwater monitoring wells, irrigation wells, injection wells or abandoned wells) was noted on the subject property.

5.6.7 Septic Systems

No septic systems are present on the subject property.

5.7 Non-Scope Issues

ASTM guidelines identify non-scope issues, which are beyond the scope of a Phase I ESA as defined by ASTM. These issues may affect environmental risk at the subject property and may warrant discussion and/or assessment. Some of these non-scope issues include; asbestos-containing building materials, radon, lead-based paint, and wetlands which are discussed below.

5.7.1 Asbestos-Containing Building Materials

The potential for asbestos containing materials (ACM) existing at the subject property is low due to the lack of site structures. Concrete linings of old irrigation ditches and scattered concrete pipe may have asbestos containing materials present.

5.7.2 Lead-Based Paint

The potential for lead based paint residues existing at the subject property is very low due to the lack of site development.

5.7.3 Radon

The subject property is located in Zone 3 as shown on the EPA Map of Radon Zones indicating a predicted average indoor radon screening level of less than 2 pCi/L.

5.7.4 Wetlands

The EDR Area Study Map indicates National Wetland Inventory areas located within one (1) mile of the subject properties with classification codes PSS1C (palustrine, scrub-shrub, broad leaved deciduous, seasonally flooded) and PSS1Ah (palustrine, scrub-shrub, broad leaved deciduous, temporary flooded, diked) and also indicates that the Imperial Irrigation District (IID) canals and drains are considered National Wetland Inventory areas. Based

on site reconnaissance the wetland areas shown that are not IID canals and/or drains were dry.

5.7.5 Agricultural Use

Based on our review of environmental records, historical documents, and site conditions, the property has been in agricultural use since the late 1940's. Residues of currently available pesticides and currently banned pesticides such as DDT/DDE may be present in near surface soils in limited concentrations. The concentrations of these pesticides found on other Imperial Valley agricultural sites are typically less than 25% of the current regulatory threshold limits and are not considered a significant environmental hazard. The presence and concentration of near surface pesticides at this site can be accurately characterized only by site-specific sampling and testing.

6.0 INTERVIEWS

GS Lyon interviewed individuals familiar with the subject property, as identified to us, and/or government officials in order to evaluate historical uses and identify potential RECs existing on the site. The individuals interviewed were asked to provide responses in good faith and to the best of their knowledge. The following sections identify the individuals interviewed and summarize the information each provided; however, additional information provided by these individuals may be presented in other sections of this report.

6.1 Interview with Owner Representative

Mr. Harold Walk, real estate supervisor for property owner (Imperial Irrigation District), prepared the User Questionnaire for the subject properties. According to the questionnaire, Mr. Walk had no information pertaining to any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject properties; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject properties; or any notices from a governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

In a phone interview with Mr. Harold Walk on March 8, 2018 he indicated the Imperial Irrigation District purchased parcel 025-260-024 (northern parcel) in the late 1980's and constructed the electrical substation in 1987. Parcel 025-280-003 (southern parcel) was purchased in early 2000's and has been fallowed since about 2014. Mr. Walk commented that no farm shops or residences occupied the sites when the IID purchased them and that they had been in agricultural cultivation at the time of purchase.

6.2 Interview with Local Government Officials

The DTSC Imperial CUPA office was contacted (Veronica Lopez) by email on February 28, 2018. CUPA records were searched for environmental issues related to the subject site. No records were found associated with the subject site.

6.3 Interview with Occupants

The subject site consists of agricultural fields; therefore, there are no occupants.

7.0 EVALUATION

7.1 Summary of Findings

The subject site is located in an area generally developed for agricultural use in northeastern Imperial Valley approximately 6 miles northeast of Calipatria, California. The subject property was first developed prior to 1948 for agricultural use. All portions of the subject site have been in agricultural use or fallowed since the late-1940's.

7.2 Conclusions

GS Lyon has performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM E1527-13 of the property located north and south of E. Simpson Road at E. Highline Canal Road (APN 025-260-024& 025-280-003) approximately 6.0 miles northeast of Calipatria, California. Any exceptions to, or deviations from, this practice are described in Section 1.4 of this Phase I ESA report. This assessment has revealed the following recognized environmental conditions (RECs) in connection with the subject property:

7.2.1 Recognized Environmental Conditions

A recognized environmental condition (REC) refers to the presence or likely presence of any hazardous substance or petroleum product on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term REC includes hazardous substances and petroleum products even under conditions that might be in compliance with laws. The term is not intended to include "de minimis" conditions that do not present a threat to human health and/or the environment and that would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies.

This Phase I ESA has revealed no evidence of *recognized environmental conditions* in connection with the subject site.

7.2.2 Historical Recognized Environmental Conditions

A historical recognized environmental condition (HREC) refers to an environmental condition which would have been considered a REC in the past, but which is no longer considered a REC based on subsequent assessment or regulatory closure.

This Phase I ESA has revealed no evidence of *historical recognized environmental conditions* in connection with the subject site.

7.2.3 Environmental Concerns and De Minimis Conditions

This Phase I ESA has revealed no *de minimis* conditions or environmental concerns in connection with the subject site, except for the following:

- Pesticide residues (low concentrations) typical to agricultural crop applications may be present in the near surface soils.
- Asbestos may be present in concrete lining for old irrigation ditches and some scattered concrete irrigation pipe.

7.3 Recommendations

Based on the scope of work performed for this assessment, it is our professional opinion that no RECs have been identified in connection with the subject property that would warrant further environmental study (Phase II) at this time.

8.0 REFERENCES

40 CFR 312, Standards and Practices for All Appropriate Inquiries; Final Rule, November 2005 (AAI Rule).

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Department of Toxic Substances Control. 2017. EnviroStor Database Website, <http://www.envirostor.dtsc.ca.gov/public/>.

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Environmental Data Resources, Inc., *The EDR Aerial Photo Decade Package*. Inquiry number 5195427.9, February 28, 2018.

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Environmental Data Resources, Inc., *EDR Historical Topo Map Report*. Inquiry number 5195427.4, February 21, 2018.

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State Water Resources Control Board. 2017. GeoTracker Database Website, <http://geotracker.swrcb.ca.gov/>.

United States Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey, accessed via the Internet, November 2017.

United States Environmental Protection Agency, EPA Map of Radon Zones (Document EPA-402-R-93-071), accessed via the Internet, November 2017

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