

APPENDIX H

PHASE I ENVIRONMENTAL SITE ASSESSMENTS

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PHASE I
ENVIRONMENTAL SITE ASSESSMENT

SEVILLE SOLAR FARM ONE
Portions of Sections 26 and 27 of T12S, R9E, SBB&M
IMPERIAL COUNTY, CALIFORNIA

May 2013

EMA Report No. 2226-04

Prepared for:

Regenerate Power LLC
1050 Doyle Street
Menlo Park, California 94025

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May 2013

EMA Report No. 2226-04

Prepared for:

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Menlo Park, California 94025

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**PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

**SEVILLE SOLAR FARM ONE
Portions of Sections 26 and 27 of T12S, R9E, SBB&M
IMPERIAL COUNTY, CALIFORNIA**

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ENVIRONMENTAL MANAGEMENT ASSOCIATES

**PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

**SEVILLE SOLAR FARM ONE
Portions of Sections 26 and 27 of T12S, R9E, SBB&M
IMPERIAL COUNTY, CALIFORNIA**

1 SUMMARY

Environmental Management Associates, Inc. (EMA) completed a Phase I Environmental Site Assessment (Phase I ESA) of the proposed Seville Solar Farm One Project site (Property) located about 13 miles south-southwest of the community of Salton City, in Imperial County, California. The proposed Property is comprised of the northwest quarter of Section 26 and the northeast quarter of Section 27, Township 12 South, Range 9 East, San Bernardino Base and Meridian (SBB&M), a nominal 320-acre area. The Property is part of an idled farmland development located about 1.4 miles south of California State Highway 78. The Property is accessed via an unnamed dirt road off of Highway 78 southwards to the northern boundary of the Property. The access road to the Property is located approximately 9 miles west of the Highway 78/Highway 86 junction and about 4 miles east of the San Diego County line.

The Phase I ESA included an inspection of the Property on April 22, 2013, communications with relevant agencies, interviews with persons familiar with the Property and the history of the Property, and a review of historical records to evaluate the potential for hazardous substance or petroleum hydrocarbon contamination at the site.

The farmland development on which the Property is located was historically irrigated with water from on site groundwater wells from the late-1950's to the late-2000's, but agricultural activities on the Property have been suspended in recent years. Available records indicate that some agricultural pesticides and herbicides were permitted for use on the site, however, at least portions of the farmland development, including the subject Property, was converted to organic farming practices.

No petroleum hydrocarbons or hazardous substances were observed on the Property and no evidence of hazardous material spills or releases were observed on the site during the site inspection. About 1.82 miles of irrigation pipeline could exist below the surface of the Property. Property records suggest that about one-half mile of this pipeline, located along the northern boundary of the Property, could be a 15-inch diameter transite cement pipeline. Transite is an asbestos containing cement in common use during the timeframe that the irrigation network was constructed. Asbestos fibers were historically used in the construction of transite to provide tensile strength to the cement pipeline, but the use of asbestos to manufacture transite was phased out in the 1980's. If the pipeline remains buried it does not represent a *recognized environmental condition*; however, if the pipeline is somehow exposed during site construction for the proposed

solar farm development of the site, the pipeline should be managed as ACM and either left buried in place or removed by a qualified ACM abatement contractor.

Except as described above, no other observations of any *recognized environmental conditions* were identified during the investigation and no further environmental site assessment of the subject Property appears to be warranted from the information currently available.

In summary, EMA has performed a Phase I Environmental Site Assessment of the subject Seville Solar Farm One Property area, Imperial County, California in conformance with the scope and limitations of ASTM Practice E 1527-05. Except for the existence of a buried transite pipeline, no *recognized environmental conditions* were identified during the investigation and no further environmental site assessment of the subject Property appears to be warranted from the information currently available.

2 INTRODUCTION

2.1 Purpose

Environmental Management Associates, Inc. (EMA), of Brea, California, was retained by *Regenerate Power LLC* of Menlo Park, California (CLIENT) to perform a Phase I Environmental Site Assessment (ESA) of the proposed Seville Solar Farm One Property, a nominal 320-acre area occupying the northwest quarter of Section 26 and the northeast quarter of Section 27, in Township 12 South, Range 9 East, San Bernardino Base and Meridian (T12S, R9E, SBB&M) in an unincorporated portion of Imperial County, California.

The Phase I ESA was requested to evaluate the area identified above for the presence of, or reasonable potential presence of, hazardous or toxic substance contamination as part of CLIENT's due diligence activities. The Phase I ESA is intended to comply with ASTM Standard E 1527-05 (*Practices for Phase I Environmental Site Assessment*) and All Appropriate Inquiry (AAI) as defined by the Environmental Protection Agency for potential CERCLA liability protection pursuant to 40 CFR Part 312 (*Standards and Practices for All Appropriate Inquiries; Final Rule*).

2.2 Detailed Scope of Services

The Phase I ESA included:

1. A review of all relevant records made available from CLIENT;
2. An inspection of the developed site and drive-by examination of nearby properties for evidence of hazardous material use and potential hazardous waste contamination;
3. A review of historical property records and aerial photographs for evidence of activities or past uses on the property which may have generated hazardous wastes;
4. Communications with relevant agencies, and review of agency listings for evidence of past hazardous materials use, contamination, or remediation on the site or adjacent properties;
5. Interviews with available property owner(s), occupant(s), and other person(s) knowledgeable of the history of the Property area;

6. Review of available geohydrologic records for evidence of hazardous material contamination;
7. Assessment of potential environmental liens by review of a provided Property title report; and/ or an environmental liens search; and
8. Preparation of this written report summarizing the findings of the site assessment and providing recommendations, as appropriate.

2.3 Significant Assumptions

It is assumed that the historic agricultural development and farming of the Property and neighboring lands are the principal activities and primary sources for anthropogenic contamination that may have occurred within the area comprising the Seville Solar Farm One Property.

2.4 Limitations and Exceptions

Limited site specific information was made available to *Environmental Management Associates, Inc.* (EMA) about the Project and Property, and no site specific sampling activities were conducted by EMA on the Property. As such, conclusions reached by this assessment result largely from observations made during the site inspection, personal interviews, agency and historical records, and professional experience and judgment. As is necessary for any assessment using secondary information, EMA must qualify the results of our analysis to caution that site contamination not evident from the surface site inspection and available records could exist on the Property.

The site assessment specifically did not include any soil or groundwater sampling or analysis activities, or sampling activities for asbestos containing materials (ACM). Further, the site assessment did not include investigation for the presence of urea, formaldehyde, or radon gas. Such materials, if present, normally cannot be identified without use of special instruments, specially trained personnel, or special testing procedures.

2.5 Special Terms and Conditions

There are no special terms or conditions applicable to this Phase I ESA.

2.6 User Reliance

This report is considered confidential and privileged information which was prepared for the sole and exclusive use and information of our CLIENT. It is understood that the institutional investors, lending institutions, brokers, attorneys, agents and other persons or entities requiring this environmental due diligence information for any financial transaction(s) for the Seville Solar Farm One are authorized to use and rely on the findings of the report. However, it is also understood that these environmental findings, and the release thereof, is for informational purposes only and should not be relied upon by any other persons or entities for any other purposes except as specifically authorized by EMA or CLIENT.

3 SITE DESCRIPTION

3.1 Location and Legal Description

The subject Property is comprised of two (2) adjacent parcels of land occupying portions of Section 26 and Section 27, Township 12 South, Range 9 East, San Bernardino Base and Meridian (SBB&M) (see Table 1). The “eastern parcel” is located in the northwest corner of Section 26 (APN 018-170-012), and the adjacent “western parcel” is located in the northeast corner of Section 27 (APN 018-170-013).

Table 1: Imperial County Assessor Parcels Comprising the Subject Property

<i>Northwest Quarter of Section 26, T12S, R9E, SBB&M (160 Acres):</i>	
Tax ID No.: 018-170-012-000	160 Acres
<i>Northeast Quarter of Section 27, T12S, R9E, SBB&M (160 Acres):</i>	
Tax ID No.: 018-170-013-000	160 Acres
Total Property:	320 Acres

The Property is located about 1.4 miles south of State Route 78 (SR 78). Primary access to the Property is via an unnamed dirt access road off of SR 78 (see Photograph 1). The access road is located about 9 miles west of State Highway 86 and about 4 miles east of the San Diego County line in an unincorporated area of Imperial County, California (see Figure 1). A street address earlier assigned to the farmland development, of which the subject Property is a contiguous part, is 1791 West Highway 78, Borrego Springs, CA. The street address appears in an Imperial County Conditional Use Permit issued for construction of a well for irrigation water on the property located immediately north of the subject Property in 1988. The relevant portion of a legal description of the Property, as extracted from a Preliminary Title Report prepared for the Property and neighboring lands (Appendix A: Preliminary Title Report), is as follows:

ALL THOSE CERTAIN PARCELS OF LAND IN TOWNSHIP 12 SOUTH, RANGE 9 EAST S.B M., IN AN UNINCORPORATED AREA OF THE COUNTY OF IMPERIAL STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF AS FOLLOWS:...

PARCEL 5: NORTHWEST QUARTER OF SECTION 26; EXCEPTING THEREFROM 20% INTEREST IN AND TO ALL OIL GAS, HOT WATER STEAM, STEAM POWER THERMAL ENERGY AND OTHER MINERALS IN AND UNDER AND THAT MAY BE PRODUCED FROM SAID LAND,.AS RESERVED BY SAN DIEGO TRUST AND SAVINGS BANK, AS TRUSTEE OF TRUST 1-3358-00-2.

PARCEL 6: NORTHEAST QUARTER OF SECTION 27; EXCEPTING THEREFROM 20% INTEREST IN AND TO ALL OIL GAS, HOT WATER STEAM, STEAM POWER THERMAL ENERGY AND OTHER MINERALS IN AND UNDER AND THAT MAY BE PRODUCED FROM SAID LAND,.AS

*RESERVED BY SAN DIEGO TRUST AND SAVINGS BANK, AS TRUSTEE OF
TRUST 1-3358-00-2.*

The approximate boundaries of the subject Property are shown on Figure 2 and Figure 3; however, it is noted that the Property is located near the junction of two USGS 7.5 minute quadrangle maps (Harpers Well to the east and Borrego Mountain SE to the west) with poor section line interface agreement and making section line mapping difficult.

3.2 Site and Vicinity General Characteristics

The Property is located in a largely undeveloped and unincorporated portion of northwest Imperial County identified as Lower Borrego Valley on topographic maps. The Property is part of an isolated farmland development of about 2.7 square miles located outside of the Imperial Irrigation District (IID) irrigation channel network. The land surrounding the farmland development is largely undeveloped open space desert with a checkerboard of federal, state, and private land ownership (see Figure 4). The Property is located about 7 miles east of the unincorporated community of Ocotillo Wells which is located in neighboring San Diego County (see Figure 1). Except for the isolated farmland development, there is relatively little evidence of development in the immediate vicinity of the Property. The IID Anza substation is located about 1.7 miles northeast of the Property along SR 78 (see Photograph 2), and a commercial recreational vehicle park and café complex is located about 1.5 miles west of the Property driveway access road along SR 78 (see Photograph 3).

According to topographic maps, sections of the San Felipe Creek drainage historically crossed through the Property (see Appendix C: FEMA Firm). The Creek drainage channels appear to have been diverted to the south by earthen berms constructed along the western boundaries of the subject Property and the neighboring farmland immediately north of the Property. The diverted San Felipe Creek drainage courses southwards immediately west of the Property and appears to join the Fish Creek Wash drainage south of the Property. The Tarantula Wash drainage is located north and east of the Property. The San Felipe, Fish Creek, and Tarantula drainage channels are more deeply incised downstream of the Property and come to a confluence as San Felipe Creek about 4.3 miles east of the Property. San Felipe Creek is considered a major desert wash system that empties into the Salton Sea about 12.7 miles east-northeast of the Property.

3.3 Current Use of Property

The Property is entirely idled farmland that was previously irrigated from water produced from irrigation wells located on or near the Property.

3.4 Descriptions of Structures, Roads, and Other Improvements

The Property is unoccupied by any building or other above ground structures. Unpaved access roads are located on the north, west and south boundaries of the Property. In addition, one central unpaved access road crosses east west through the approximate middle of the Property, and multiple north-south unpaved access roads interconnect with the central east-west access road from both the north and south boundary access roads (see Figure 2). A trapezoidal-shaped,

former tailwater storage basin is located near the northeast corner of the Property. The former storage basin was dry at the time of the site inspection and vegetation was growing within the structure (see Photograph 12). An east-west routed, cement-lined channel is located on the south side of east-west access road along the northern boundary of the Property. The cement-lined channel begins about 920 feet west of the water well (Water Well #4) located near the northern edge of the western parcel of the Property and extends eastwards past the eastern boundary of the subject Property (see Photograph 14).

3.5 Current Uses of the Adjoining Properties

The properties immediately north and east of the Property are also idled farmlands similar to the subject Property. The properties immediately south and west of the subject Property are undeveloped desert. The IID Anza substation is located about 2 miles northeast of the Property, immediately south of Highway 78 (see Photograph 2). The general vicinity is predominantly open space which is actively used by off highway vehicle enthusiasts. The Ocotillo Wells State Vehicular Recreation Area (SVRA) is located less than 1.5 miles north of the Property and immediately north of Highway 78 (see Figure 5). Recreational off road vehicle riding and primitive camping is popular in the SVRA, and a few developed recreational vehicle (RV) parks are located in the Property vicinity. The Blu-In Café/RV Park is located about 1.5 miles west of the access road to the Property and immediately south of Highway 78 (see Photograph 3). No other commercial development was identified within five miles of the Property.

4 USER PROVIDED INFORMATION

EMA was provided general information about the Property by CLIENT, including the following historical summary of the Ranch Oasis/Allegretti Farms development of the larger, isolated farmland area which includes the subject Property.

Ranch Oasis/Allegretti Farms

- *Founded by Ted Jacobs in the 1950's.*
- *As of 1973 (per aerial photo included), approximately 600 acres were cleared for farming.*
- *As of 1978 (per aerial photo included), approximately 1600 acres under cultivation, appears to all be alfalfa.*
- *Purchased by Allegretti & Company in 1981.*
- *As of 1984 (per aerial photo enclosed), approximately 1000 acres under cultivation. Crops during this period included alfalfa, sorghum, wheat, and corn.*
- *Farmed leased by Morgan Ranches/Kelomar from 1993 to 2009. Crops grown included melons, onions, alfalfa, wheat, safflower, "yuppie" lettuce [arugula], asparagus, milo, carrots. Most acreage farmed at any one time was approximately 1000 acres. Average acreage under cultivation was around 500.*
- *Farm leased by Oasis Organics in 2010. Crop grown was 80 acres of onions.*

- 80 acres of wheat, safflower, and milo grown in 2011.
- Farm is certified organic.

A preliminary geotechnical investigation report was also provided for review which provides a description and local geology of the larger farmland area which includes the subject Property. The geotechnical investigation included subsurface investigation both on and near the Property. No evidence of encountering any suspected petroleum hydrocarbon or hazardous substances was reported (Petra 2012).

Earlier historical records were also provided, including: a water supply assessment of *Ranch Oasis* (Koebig & Koebig, Inc. 1970); a hydrogeologic investigation for Allegretti Farms (Krieger & Stewart, Inc. 1995); an Allegretti Farms well history (South West Pump & Drilling 2008); a soils analysis laboratory report (USDA Soil Conservation Service 1986); and water well related assessment documents.

4.1 Title Records

CLIENT provided EMA with a Preliminary Title Report and Exceptions, dated April 22, 2012, covering the subject Property and other neighboring properties (Appendix A: Preliminary Title Report). The Title Report indicates the Property is owned by Allegretti & Company, a California Corporation. The Title Report also indicates that a 20% interest in oil, gas, geothermal and other minerals was reserved by San Diego Trust and Savings Bank for the subject Property. However, there is no indication of any existing or former leases issued for development of these resources on the Property among the title records.

The exceptions to the title identify multiple power line easements across the subject Property and neighboring properties. The Title Report documentation includes a Memorandum of Conditional Use Permit (CUP), recorded on August 24, 1988, that was issued by the County of Imperial to Allegretti & Company for the construction of a water well, on the adjacent farmland property to the north. The CUP indicates the property address is 1791 West Highway 78, Borrego Springs, California. However, the village of Borrego Springs is located in neighboring San Diego, County about 21 miles west-northwest of the Property.

4.2 Environmental Liens or Activity and Use Limitations

An environmental liens records search for an area which included the subject Property was conducted in July 2012 (see Appendix B: EDR Environmental Liens Search Report). This assessment was supplemented by review of the more recently completed Preliminary Title Report provided by CLIENT to identify potential environmental liens or use limitations of the subject Property (see Section 4.1). The findings of the environmental liens assessment are discussed in Section 8.

4.3 Specialized Knowledge

CLIENT has not communicated any *specialized knowledge* of the Seville Solar Farm One Project or the subject Property that is material to any *recognized environmental conditions* on the site.

4.4 Valuation Reduction for Environmental Issues

CLIENT has not communicated any value reduction of the Property that might be related to environmental issues. No *recognized environmental conditions* are known about the proposed Seville Solar Farm One Project or the subject Property except those described in this Phase I ESA.

4.5 Owner, Property Manager, and Occupant Information

EMA interviewed representatives of both the Seville Solar Farm One Project, the subject Property owner, and a former property tenant (see Section 7).

4.6 Reason for Performing Phase I

This Phase I ESA was prepared as part of CLIENT's environmental due diligence relative to pending financial transactions for the Seville Solar Farm One Project, a proposed solar energy development on the Property.

4.7 Other

It is assumed that the purpose for this Phase I ESA is to qualify for the innocent landowner defense to CERCLA liability. It is also assumed that this Phase I ESA may be used to better understand potential *recognized environmental conditions* that could materially impact the proposed solar energy development on the Property.

5 RECORDS REVIEW

5.1 Standard Environmental Record Sources

A search of agency listings was conducted by a third-party database research service, *Environmental Data Resources, Inc.* (EDR). Descriptions of the lists reviewed and the results of the regulatory agency database record search are provided for the area defined as Parts of Sections 26 and 27, T12S, R9E, SBB&M (see Appendix D: EDR Radius Map with GeoCheck). The following is a Site Distribution Summary of the principal agency database records searched by EDR (see Table 2). The databases were all searched to a distance of up to 2 miles from the geographically plotted center of the Property which meets or exceeds the search distances prescribed by ASTM Standard 1527-05.

Phase I Environmental Site Assessment
Seville Solar Farm One

Table 2: EDR Search Site Distribution Summary – Seville Solar Farm One

AGENCY	DATABASE	SEARCH DISTANCE	SUBJECT PROPERTY	≤ 1/2 MILE	>1/2 ≤1 MILES	>1 MILES	TOTAL PLOTTED
Standard Environmental Record Databases:							
EPA	Federal NPL (National Priority List)	2.0	0	0	0	0	0
EPA	Proposed NPL (Proposed National Priority List)	2.0	0	0	0	0	0
EPA	NPL Liens (Federal Superfund Liens)	2.0	0	0	0	0	0
EPA	Delisted NPL (Delisted from NPL)	2.0	0	0	0	0	0
EPA	CERCLIS (Comprehensive Environmental Response, Compensation ...)	2.0	0	0	0	0	0
EPA	FEDERAL FACILITY	2.0	0	0	0	0	0
EPA	CERCLIS-NFRAP List (CERCLIS No Further Remedial Action Planned)	2.0	0	0	0	0	0
EPA	Federal CORRACTS (Corrective Action Reports)	2.0	0	0	0	0	0
EPA	RCRA non-CORRACTS TSD	2.0	0	0	0	0	0
EPA	RCRA (Large Quantity Generators)	2.0	0	0	0	0	0
EPA	RCRA (Small Quantity Generators)	2.0	0	0	0	0	0
EPA	RCRA (Conditionally Exempt SQG)	2.0	0	0	0	0	0
EPA	US ENG Controls (Engineering Controls Sites List)	2.0	0	0	0	0	0
EPA	US INST Control (Sites with Institutional Controls)	2.0	0	0	0	0	0
Dept. of Navy	LUCIS (Land Use Control Information System)	2.0	0	0	0	0	0
NRC	ERNS (Emergency Response)	2.0	0	0	0	0	0
DTSC	RESPONSE (State and Tribal Equivalent to NPL)	2.0	0	0	0	0	0
DTSC	ENVIROSTOR (EnviroStor Database)	2.0	0	0	0	0	0
IWMB	SWF/LF (SWIS – Solid Waste/Landfill)	2.0	0	0	0	0	0
SWRCB	LUST (Leaking Underground Storage Tank Database)	2.0	0	0	0	0	0
CRWQCB, CRB	SLIC REG 7 (SLIC List)	2.0	0	0	0	0	0
EPA Region 9	INDIAN LUST R9 (Leaking UST on Indian Land)	2.0	0	0	0	0	0

Phase I Environmental Site Assessment
Seville Solar Farm One

AGENCY	DATABASE	SEARCH DISTANCE	SUBJECT PROPERTY	≤ 1/2 MILE	>1/2 ≤1 MILES	>1 MILES	TOTAL PLOTTED
SWRCB	UST (Active UST Facilities)	2.0	0	0	0	0	0
SWRCB	AST (Above Ground Storage Tanks)	2.0	0	0	0	0	0
EPA Region 9	INDIAN UST R9 (UST on Indian Land)	2.0	0	0	0	0	0
FEMA	FEMA UST (List of FEMA owned UST)	2.0	0	0	0	0	0
DTSC	VCP (Voluntary Cleanup Program Properties)	2.0	0	0	0	0	0
EPA	INDIAN VCP	2.0	0	0	0	0	0
Additional Environmental Records:							
EPA	US BROWNSFIELDS (A Listing of Brownfields Sites)	2.0	0	0	0	0	0
EPA	ODI (Open Dump Inventory)	2.0	0	0	0	0	0
EPA	DEBRIS REGION 9 (Torres Martinez Reservation Dump Sites)	2.0	0	0	0	0	0
SWRCB	WMUDS/SWAT (Waste Management)	2.0	0	0	0	0	0
CA Dept of Cons.	SWRCY (Recycler Database)	2.0	0	0	0	0	0
IWMB	HAULERS (Registered Waste Tire Hauler Listing)	2.0	0	0	0	0	0
EPA	INDIAN ODI (Open Dumps on Indian Lands)	2.0	0	0	0	0	0
DEA	US CDL (Clandestine Drug Labs)	2.0	0	0	0	0	0
DTSC	HIST CAL-SITES (Calsites Database)	2.0	0	0	0	0	0
DTSC	SCH (School Property Evaluation Program)	2.0	0	0	0	0	0
SWRCB	TOXIC PITS (Toxic Pits Cleanup Act)	2.0	0	0	0	0	0
DEA	CDL (Clandestine Drug Labs)	2.0	0	0	0	0	0
DEA	US HIST CDL (Historical Clandestine Drug Labs)	2.0	0	0	0	0	0
CalEPA	CA FID UST (Facility Inventory Database)	2.0	0	0	0	0	0
SWRCB	HIST UST (Historical UST Listing)	2.0	0	0	0	0	0
SWRCB	SWEEPS UST (Statewide Evaluation and Planning System)	2.0	0	0	0	0	0
EPA	LIENS 2 (CERCLA Lien Information)	2.0	0	0	0	0	0
DTSC	LIENS (Environmental Liens Listings)	2.0	0	0	0	0	0
DTSC	DEED (List of Deed Restrictions)	2.0	0	0	0	0	0

Phase I Environmental Site Assessment
Seville Solar Farm One

AGENCY	DATABASE	SEARCH DISTANCE	SUBJECT PROPERTY	≤ 1/2 MILE	>1/2 ≤1 MILES	>1 MILES	TOTAL PLOTTED
DOT	HMIRS (Hazardous Materials Information Reporting System)	2.0	0	0	0	0	0
OES	CHMIRS (HazMat Incidents)	2.0	0	0	0	0	0
SWRCB	LDS (Land Disposal Sites)	2.0	0	0	0	0	0
SWRCB	MCS (Military Cleanup Sites)	2.0	0	0	0	0	0
First Search	SPILLS90 (Spill/Release Records exclusively from FirstSearch databases)	2.0	0	0	0	0	0
Other Ascertainable Records:							
EPA	RCRA-NonGen (RCRA Non Generators)	2.0	0	0	0	0	0
DOT	DOT OPS (Incident and Accident Data)	2.0	0	0	0	0	0
USGS	DOD (Department of Defense Sites)	2.0	0	0	0	0	0
ACOE	FUDS (Formerly Used Defense Sites)	2.0	0	0	0	0	0
Dept. of Justice	CONSENT (Superfund Consent Decrees)	2.0	0	0	0	0	0
EPA	ROD (Records of Decision – Permanent NPL Remedy)	2.0	0	0	0	0	0
DOE	UMTRA (Uranium Mill Tailings Sites)	2.0	0	0	0	0	0
DOL, MSHA	US MINES (Mines Master Index File)	2.0	0	0	0	0	0
EPA	TRIS (Toxic Chemical Release Inventory)	2.0	0	0	0	0	0
EPA	TSCA (Toxic Substances Control Act)	2.0	0	0	0	0	0
EPA, OPPTS	FTTS (FIFRA/TSCA Special Tracking)	2.0	0	0	0	0	0
EPA	HIST FTTS (FIFRA/TSCA Tracking Admin. Case Listing)	2.0	0	0	0	0	0
EPA	SSTS (FIFRA Section 7 Tracking)	2.0	0	0	0	0	0
EPA	ICIS (Integrated Compliance Information System)	2.0	0	0	0	0	0
EPA	PADS (PCB Activity Database System)	2.0	0	0	0	0	0
NRC	MLTS (Material Licensing Tracking System)	2.0	0	0	0	0	0
EPA	RADINFO (Radiation Information System)	2.0	0	0	0	0	0
EPA	FINDS (Facility Index System/Facility Registry System)	2.0	0	0	0	0	0
EPA	RAATS (RCRA Administrative Action Tracking System)	2.0	0	0	0	0	0
EPA	RMP (Risk Management Plans)	2.0	0	0	0	0	0

Phase I Environmental Site Assessment
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AGENCY	DATABASE	SEARCH DISTANCE	SUBJECT PROPERTY	≤ 1/2 MILE	>1/2 ≤1 MILES	>1 MILES	TOTAL PLOTTED
DHS	CA BOND EXPENDITURE PLAN	2.0	0	0	0	0	0
CA Dept. of Cons.	UIC (Underground Control Injection Wells)	2.0	0	0	0	0	0
SWRCB	NPDES (Listing of NPDES Permits)	2.0	0	0	0	0	0
CalEPA/OEI	CORTESE (SWRCB/IWB/DTSC Sites)	2.0	0	0	0	0	0
DTSC	HIST CORTESE (Hazardous Waste & Substance Site List)	2.0	0	0	0	0	0
CUPA	CUPA Listings	2.0	0	0	0	0	0
SWRCB	NOTIFY 65 (Proposition 65 Records)	2.0	0	0	0	0	0
DTSC	DRYCLEANERS (Cleaner Facilities)	2.0	0	0	0	0	0
CRWQCB, LA	WIP (Well Investigation Program Case List)	2.0	0	0	0	0	0
SWRCB	ENF (Enforcement Action Listing)	2.0	0	0	0	0	0
ARB	EMI (Emissions Inventory Data)	2.0	0	0	0	0	0
USGS	INDIAN RESERV (Indian Reservations)	2.0	0	0	0	0	0
EPA	SCRD DRYCLEANERS (Remediation of Drycleaners Listing)	2.0	0	0	0	0	0
DOE	COAL ASH DOE (Steam-Electric Plan Operation Data)	2.0	0	0	0	0	0
EPA	COAL ASH EPA (Coal Combustion Residues Surface Impoundments List)	2.0	0	0	0	0	0
DTSC	HWT (Registered Hazardous Waste Transporter Database)	2.0	0	0	0	0	0
DTSC	HWP (EnviroStor Permitted Facilities Listing)	2.0	0	0	0	0	0
DTSC	FINANCIAL ASSURANCE (Financial Assurance Information)	2.0	0	0	0	0	0
EPA	2020 COR ACTION (2020 Corrective Action Program List)	2.0	0	0	0	0	0
EPA and Local Air Agencies	US AIRS (Aerometric Information Retrieval System Point Sources)	2.0	0	0	0	0	0
EPA	PRP (Potentially Responsible Parties)	2.0	0	0	0	0	0
SWRCB	WDS (Waste Discharge System)	2.0	0	0	0	0	0
EPA	EPA Watch List	2.0	0	0	0	0	0
EPA	US FIN ASSUR (Financial Assurance Information)	2.0	0	0	0	0	0
EPA	PCB TRANSFORMER (PCB Transformer Registration Database)	2.0	0	0	0	0	0

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AGENCY	DATABASE	SEARCH DISTANCE	SUBJECT PROPERTY	≤ 1/2 MILE	>1/2 ≤1 MILES	>1 MILES	TOTAL PLOTTED
CA Dept. of Cons.	PROC (Certified Processors Data)	2.0	0	0	0	0	0
CA DPH	MWMP (Medical Waste Management Program Listing)	2.0	0	0	0	0	0
EDR Exclusive Records:							
EDR	Manufactured Gas Plants (EDR Manufactured Gas Sites)	2.0	0	0	0	0	0
EDR	US Hist Auto Stat (EDR Historic Gas Stations)	2.0	0	0	0	0	0
EDR	US Hist Cleaners (EDR Historic Dry Cleaners)	2.0	0	0	0	0	0
* Analysis of the sites identified in this summary is provided in Section 8 (Findings) of this assessment.							

Phase I Environmental Site Assessment
Seville Solar Farm One

Table 3: Orphan Sites Search Summary (17 Records) – Seville Solar Farm One

ID No.	City	EDR ID	Site Name	Site Address	Zip	Database	Location Relative to the Property
1	Imperial County	2010936111	FUEL FARM NAVAL AIR FACILITY EL CE	FUEL FARM NAVAL AIR FACILITY E	---	ERNS	~28 miles SE
2	OASIS	S101631107	ALAMO DISCOUNT MARKET	81050 HIGHWAY 86	92274	CA FID UST, SWEEPS UST	~22 miles NNW
3	THERMAL	S105027062	JPH ENTERPRISES	HWY 111/AVENUE 60	92274	HIST CORTESE	~36 miles NNW
4	THERMAL	S108746303	DESERT MOBILE HOME PARK INC	68 HWY 195	92274	HAZNET	~31 miles NNW
5	THERMAL	1015730669	TORRES MARTINEZ PESTICIDE SITE	EAST OF HWY 195 AND 68 th ST	92274	CERCLIS	~31 miles NNW
6	THERMAL	U001574202	HORNUNG RANCH	92-770 HWY 86	92274	HIST UST	~31 miles NNW
7	THERMAL	U001574231	TINACHI RANCH	HIGHWAY 86	92274	HIST UST	~31 miles NNW
8	THERMAL	U003802011	ALAMO DISCOUNT MARKET	81050 HWY 86	92274	UST	~22 miles NNW
9	THERMAL	S105025336	SALS TIRES	81050 HWY 86	92274	HIST CORTESE, LUST, HAULERS	~22 miles NNW
10	THERMAL	S110654952	JPH ENTERPRISES	HWY 86 & AVE 60	92274	LUST	356miles NNW
11	THERMAL	U001574217	PETER RABBIT FARMS	AVE 58 BETWEEN HWY 86 / VAN	92274	HIST UST	~37 miles NW
12	OASIS	1011821556	CVWD WELL #8911	AVE 86 1 MILE S HWY	92274	RMP	~21 miles NNW
13	THERMAL	S107736881	NEW OASIS ELEMENTARY SCHOOL	SEC OLD HIGHWAY 86	92274	SCH, ENVIROSTOR	~28 miles NW
14	THERMAL	U003802948	OASIS STATION	80705 STATE HIGHWAY 86	92274	UST	~22 miles NNW
15	THERMAL	S107534953	“Unnamed Site”	55752 STATE HIGHWAY 86	92274	CDL	~22 miles NNW
16	THERMAL	U002095291	CHAPALLA MARKET	66351 STATE HIGHWAY 86	92274	CA FID UST, SWEEPS UST	~33 miles NW
17	THERMAL	U001967915	OASIS STATION	80705 STATE HIGHWAY 86	92274	CA FID UST, SWEEPS UST	~22 miles NNW

* Analysis of the sites identified in this summary is provided in Section 8 (Findings) of this assessment.

The EDR record search identified multiple “orphan” sites in the agency database records with reported uncertain locations (see Appendix E: Identified HRI Orphan Site Summaries). An effort was made by EMA to identify the locations of the “orphan” sites relative to Property, and the locations of those “orphan” sites that could be reasonably determined are summarized in Table 3. The identified database occurrences, including the located “orphan” sites, are evaluated in the findings of this assessment (see Section 8).

5.2 Additional Environmental Record Sources

EMA staff contacted selected agencies and private institutions or reviewed accessible public documents seeking relevant, accessible, hazardous material records, or records of recent hazardous material incidents on or near the Property. The following sections summarize the supplemental agency information as examined by EMA. Entities consulted or records reviewed included:

- **State Agencies**
 - California Division of Oil, Gas and Geothermal Resources
 - California Regional Water Quality Control Board, Colorado River Basin Region
- **Local Agencies**
 - Department of Toxic Substance Control (Local CUPA Agency)
 - Imperial County Databases
 - Imperial County Agriculture Commissioners Office
- **Private Sources**
 - EDR Environmental Record Search
 - EDR Historical Aerial Photographs and Topographic Maps
 - Google Earth Historical Aerial Photographs

5.2.1 State Agencies

The California Division of Oil, Gas and Geothermal Resources (CDOGGR) is the agency responsible for regulating oil, gas and geothermal wells on private and state lands in California. The CDOGGR wildcat well map covering the Property area was consulted, and no oil, gas or geothermal wells appear to have been drilled in the Property or its vicinity (see Figure 6).

The California Regional Water Quality Control Board, Colorado River Basin Region has advised that they are unable to locate the availability of records for any specific property without a Waste Discharge Order number and there is no record of a Waste Discharge Order being issued for the subject Property.

5.2.2 Local Agencies

The California Department of Toxic Substances Control (DTSC) was appointed the Certified Unified Program Agency (CUPA) for Imperial County in January 2005. The Unified Program is the consolidation of six state environmental programs into one program under the authority of a Certified Unified Program Agency. The CUPA inspects businesses or facilities that handle or store hazardous materials; generate hazardous waste; own or operate aboveground or underground storage tanks; and comply with the California Accidental Release Prevention (CalARP) Program (ICPHD 2012).

The DTSC was contacted and requested to provide information about any hazardous substance releases that may have occurred at the only available address for the Seville Solar Project area or elsewhere on or near the Property. The DTSC advised that no records were found for the available site address (Personal Communication – Veronica Lopez, DTSC Imperial CUPA; April 17, 2013).

The Imperial County Agricultural Commissioners Office (ICACO) was contacted for records of pesticide use on the farmland development of which the subject Property is a part. Records from the ICACO indicate that permits for pesticide use on one or more of the six fields comprising the Property were issued to Kelomer Inc. for the years 2000 to 2010.

The agency contact records are compiled in Appendix N: Agency Communication Records.

5.2.3 Private Sources

EMA requested EDR to conduct a search for historic aerial photographs of the Seville Solar Farm One Property (see Appendix F: EDR Aerial Photo Report). Historical aerial photographs covering portions of the Property were identified for the years 1955, 1978, 1984, 1996, 2002, 2005, 2009 and 2010. The 1955 photo shows an undeveloped desert area. The 1978 through 2005 photos show the Property area being actively farmed with what appear to be field crops. The tailwater basin is visible for the first time in the 2005 photo. The 2009 photo shows only the field in the northeast corner of the Property being actively farmed. The tailwater basin is visible in this photo, but the rest of the Property is fallow and farming of the field area in the northwest corner of the western parcel of the Property appears to have been suspended. The 2010 photo shows a crop in the northwestern field of the eastern parcel on the Property with no other crops visible on the Property.

EMA also obtained additional aerial photographs available from on-line sources (see Appendix G: USGS Aerial Photograph) from June 2002. This photograph shows each of the several fields on the Property as being actively cultivated with the exception of the northwestern portion of the western parcel.

EMA also compiled an overlapping series of aerial images of the Property vicinity from Google Earth (see Appendix H: Google Earth Aerial Photographs) with map years dated 1996, 2002, 2004, 2005, 2008, 2009, 2010 and 2012. The findings of review of these aerial images are consistent with the observation made of the EDR photos. However, the November 2005 photo

indicates some effort was made to farm the northwestern portion of the western parcel of the Property that was unclear from the EDR aerial photo from the same year. The 2012 photo shows that farming activities on the entire Property area have been suspended.

An earlier EDR search was undertaken for historical topographic maps covering the Seville Solar Farm One Property vicinity (see Appendix I: EDR Topo Map Report). Maps showing the Property area are dated 1947 and 1960 in 15' series; and 1956 in 7.5 minute series. Each of the topographic maps appears to depict the Property area prior to farming on the site with none of the existing fields or access road system yet in place. The San Felipe Creek drainage system shown on the 7.5' minute map appears to only have crossed through the northern-most portion eastern parcel in Section 26 and does not cross through the western parcel in Section 27.

An earlier EDR search was also undertaken for any available historical fire insurance maps covering the Property and vicinity (Appendix K: EDR Sanborn Map Report). As expected, given the rural setting of the Property, the record searches indicated that no fire insurance maps are available for the Property or vicinity. EDR also conducted a search for available building permits issued for the Property (see Appendix L: EDR – Building Permit Report), but no building permits were identified.

Except as described above, the historical record review and personal communications with agencies were largely negative and did not result in the identification of any new significant information.

5.3 Physical Setting Source(s)

Current and earlier USGS 7.5 Minute topographic maps of the area were reviewed for hydrogeologic information about the Property (see Appendix I: EDR Topo Map Report; and Appendix J: USGS Topographic Map). Two historic branches of the San Felipe Creek are shown to cross northwest to southeast over the central portion and southwestern corner of the Property. Those portions of the Property are within a Federal Emergency Management Agency (FEMA) area designated as Flood Zone A (100-year flood zone). The remainder of the Property is within Flood Zone X (see Appendix C: FEMA Firm).

No site-specific radon gas measurements were conducted as part of this investigation, nor are any known to have been conducted on the Property in the past. EPA records indicate that Imperial County is considered Zone 3 for radon, meaning the indoor average radon level is less than 2.0 pico-curries per liter (pCi/l). The EDR records search provided evidence of two agency checks for radon gas in Imperial County. That average reading was 1.45 pCi/l, less than the EPA recommended threshold of 4.0 pCi/l (Appendix D: EDR Radius Map with GeoCheck).

5.4 Historical Use Information on the Property

Historic records indicate that the subject Property is part of larger farmland development that began in the mid-1950's. Farming on the Property itself did not begin until the mid-1970's (see Appendix B: EDR Environmental Liens Search Report). Prior to that development the subject Property was open desert. A total of nine water wells have been constructed on the larger

farmland development with one of the wells, Allegretti 4, being located on the subject Property in the northwest quarter of the northwest quarter of Section 26. In the late 1970's a water pipeline system was installed for irrigation of the various fields. Based upon a sketch of the constructed irrigation water delivery system pipeline routes, approximately one-half mile of 15-inch, transite cement pipeline was constructed on the subject Property (see Figure 7).

The preliminary title report provided for the Property includes all of the larger farmland development (seven parcels) known as Allegretti Farms (see Appendix A: Preliminary Title Report). The subject Property is comprised of just two of the parcels [northwest quarter of Section 26 (eastern parcel) and northeast quarter of Section 27 (western parcel)]. An easement for a power line and associated ingress and egress was granted to the Imperial Irrigation District for a 400 foot distance in the northeast quarter of Section 27.

5.5 Historical Use Information on Adjoining Properties

The properties immediately north and east of the Property appear to have been part of the same isolated farmland development as the subject Property. The adjoining properties south and west of the Property do not appear to have been developed, and they remain largely open desert with visual evidence of off-road vehicle use.

6 SITE RECONNAISSANCE

6.1 Methodology and Limiting Conditions

The Phase I ESA was undertaken under the direction of EMA Principal Environmental Scientist, Terry R. Thomas, D.Env. Field reconnaissance was undertaken using drive-by and pedestrian surveys on April 22, 2012 by EMA Principal Environmental Scientist, Dwight L. Carey, D.Env. Dr. Carey is an experienced investigator familiar with development activities in Imperial County and associated hazardous material handling practices. There were no physical or weather-related limitations at the time of the site assessment.

6.2 General Site Setting

The Property is located approximately 11 miles west and 22 miles northwest of those portions of Imperial County that are irrigated by surface water distributed by the Imperial Irrigation District conveyance system. The subject Property is part of an isolated, 2.7-square-mile plot of land that has been developed for groundwater-irrigated agriculture. The adjacent properties to the north and east of the Property are similarly groundwater-irrigated farmland. Lands to the south and west the Property are undeveloped desert. The Tarantula Wash drainage passes north to south-southeast about 1.25 miles east of the Property. Historically, major channels of the San Felipe Creek drainage mapped to have passed through the north and central portion the Property, but that drainage has been diverted southwards around both the Property and the farmland located immediately north of the Property, by an earthen dike located along the western edge of the Property (see Figure 3 and Appendix C: FEMA Firm).

6.3 Exterior Observations

Agricultural activities on the Property appear to have been suspended for at least the last two years over much of the Property and for about the last five years for the field that occupies the northwest corner of the Property. No buildings were observed on the Property. Weeds and successional native vegetation were observed in varying stages of occupation of the former Property fields (see Photograph 4 through Photograph 11). Similarly, opportunistic vegetation was also observed within the former tailwater basin located near the northeast corner of the Property (see Photograph 12). A groundwater production well, known as Well #4, was observed near the northwest boundary of the Property immediately west of the primary Property access road (see Photograph 13). A cement-lined irrigation channel and outcrops of buried irrigation water pipeline were observed on the Property (see Photograph 14 and Photograph 15). The only unburied pipeline observed on the Property were either metal or PVC. A small fragment of potential transite pipe was observed off the Property (see Photograph 16), but no intact transite pipeline was observed on the surface of the Property.

Farming of the neighboring farmland to the north of the Property also appears to have been suspended; however, farming activities to appear to have been more recently conducted on the farmland immediately east of the Property. An above-ground diesel fuel storage tank and a covered material storage area were observed about 0.8 miles north of the Property along the north-south access road to the Property (see Photograph 17 and Photograph 18). A truck weigh scale and shed were observed in the same area. The diesel fuel storage tank was located within a concrete block secondary containment structure. No visual evidence of offsite spills from these facilities was observed.

6.4 Interior Observations

There are no permanent buildings or above ground structures located anywhere on the Property; and as such, no interior observations were made.

7 INTERVIEWS

7.1 Interview with Property Owner

The title report provided for the subject Property identifies the Property owner as ALLEGRETTI & COMPANY, A CALIFORNIA CORPORATION. A telephone interview was conducted on April 22, 2013 with Mr. Joseph A. Allegretti, President and Chief Operating Officer of Allegretti & Company. Mr. Allegretti responded to the User Questionnaire inquiries prescribed by ASTM 1527-05. No knowledge of any potential petroleum hydrocarbon or hazardous substance contamination related issues were identified during the interview (see Appendix O: Interview Records).

7.2 Interview with Property Occupants

The subject Property is not currently occupied and no farming activities appear to have been conducted on the Property for about the last two years. Available records indicate that Kelomer

Inc. of Brawley, California, conducted farming activities on the Property during the period from 2000 into 2010. The owner of Kelomer, Michael Morgan, was telephone interviewed on April 25, 2013. Mr. Morgan responded to the User Questionnaire inquiries prescribed by ASTM 1527-05. No knowledge of any potential petroleum hydrocarbon or hazardous substance contamination related issues were identified during the interview (see Appendix O: Interview Records). Mr. Morgan was uncertain, but he indicated that Kelomer Inc. may have grown crops on the Property for 10 to 15 years. The farming on the Property was utilized both organic and normal agricultural practices but ended using about 90 percent organic farming practices.

7.3 Interview with Project Representative

An interview with a Seville Solar Farm One Project representative, Cameron Bucher, Business and Regulatory Affairs Manager, ZGlobal, Inc., was conducted on April 19, 2013. Mr. Bucher responded to the User Questionnaire inquiries prescribed by ASTM 1527-05. No knowledge of any potential petroleum hydrocarbon or hazardous substance contamination related issues were identified during the interview (see Appendix O: Interview Records). Mr. Bucher provided many of the background documents cited in this report. Mr. Bucher also advised that the former tenant of the Property had most recently conducted organic farming practices on the Property.

8 FINDINGS

The subject Seville Solar Farm One Property area is comprised of approximately 320 acres of idled farmland in northwestern Imperial County, California. The Property was undeveloped desert land until the mid-1970's when groundwater well(s) were constructed on or near the Property which was used to irrigate crops. Farming continued on portions of the Property until approximately 2010. Since that time farming activities have been suspended and weeds and successional vegetation have begun to occupy the surface of former fields on the Property.

Physical evidence of the former irrigation system on the Property was observed on the site in the former ditches, a cement-lined irrigation channel and above and below ground irrigation water pipeline.

The EDR agency database record search for listings of records of hazardous substance related properties did not identify any known agency database records of petroleum hydrocarbon or hazardous substance contamination of the Property and no known potentially contaminated properties were identified within 20 miles of the Property.

The EDR agency database search identified 17 "orphan sites" for which a location was not mapped. EMA reviewed these records and determined that none of the "orphan sites" are located on or near the Property. As such, none of the "orphan sites" represent a *Recognized Environmental Condition* (REC).

8.1 Historic or Potential Site Contamination

There is no reported history of contamination of the Property by petroleum hydrocarbons or hazardous substances. As the Property was cultivated for various crops, there is the potential that

at some time during its use as farmland that one or more pesticides may have been applied on the Property. Available Imperial County Agricultural Commissioner's Office records indicate that permits were obtained for potential pesticide use on the respective fields comprising the Property. However, EMA was advised that predominantly organic farming practices were most recently conducted on the Property. The owner of the enterprise that most recently farmed on the Property indicated that at the time farming activities were terminated on the Property that organic farming practices were utilized on about 90 percent of the land.

Available records suggest that about one-half mile of 15-inch diameter, transite-cement pipeline may be buried along the central and eastern portions of the northern Property boundary, but no visual evidence of the transite pipeline was observed on the Property during the site inspection.

8.2 Potential for Future Site Contamination

There are no known sources of petroleum hydrocarbon or hazardous substance contamination on the Property. The nearest observed source of potential petroleum hydrocarbon contamination is an above ground diesel fuel storage tank located in a farm storage area about 0.8 miles north of the Property. The above ground fuel storage tank is located within a secondary containment structure and it is cross gradient to the Property. As such, the diesel fuel storage tank does not appear to be potential offsite source of Property contamination.

9 OPINION

No buildings or structures were observed on the Property. Property records suggest that up to one-half mile of transite-cement pipeline may be buried along the northern boundary of the Property. Transite is an asbestos containing cement in common use during the timeframe that the irrigation network was constructed. Asbestos fibers were historically used in the construction of transite to provide tensile strength to the cement pipeline, but the use of asbestos to manufacture transite was phased out in the 1980's. A small fragment of suspected transite was observed off the Property during the site inspection, but no visual evidence of a buried transite pipeline was observed on the Property. A buried transite pipeline is not a *recognized environmental condition*. However, unearthing of the pipeline could expose construction workers to friable asbestos containing materials (ACM) and should be considered for any development of the Property.

There was no visual evidence of any petroleum hydrocarbon or hazardous substance use on, or contamination of, the Property. Agricultural pesticides may have been historically used on crops grown on the Property, but no visual evidence of any residual pesticide use or contamination was observed on the Property. The most recent crops grown on the Property were reported to have been certified organic. The known historical use of the Property as cropland is not considered a *recognized environmental condition*.

10 CONCLUSIONS

EMA has performed a Phase I Environmental Site Assessment of the subject Seville Solar Farm One Project Property, Imperial County, California in conformance with the scope and limitations

of ASTM Practice E 1527-05. No *recognized environmental conditions* were identified on or adjacent to the Property.

A transite pipeline may be buried on the Property. Transite is an asbestos containing material (ACM). If the pipeline remains buried it does not represent a *recognized environmental condition*; however, if the pipeline is somehow exposed during site construction for the proposed solar farm development of the site, the pipeline should be managed as ACM and either left buried in place or removed by a qualified ACM abatement contractor.

Except as described above, no other observations of any potential *recognized environmental conditions* were identified during the investigation and no further environmental site assessment of the subject Property appears to be warranted from the information currently available.

11 DEVIATIONS

No material deviations were made from standard ASTM Standard E 1527-05 Practices for Phase I Environmental Site Assessment.

12 ADDITIONAL SERVICES

EMA prepared a summary report of the agricultural and groundwater well history on the Property (see Appendix M: Agricultural History of Allegretti Farms). Baseline biological and cultural resource surveys and other pre-project studies are also being undertaken; however, no additional services were provided with respect to the subject Seville Solar Farm One Project Property Phase I Environmental Site Assessment.

13 REFERENCES

The following references and personal communications were background documents used during this environmental site assessment.

Imperial County Public Health Department. 2012. Web Page: *Hazardous Materials and Medical Waste Management*. http://www.icphd.org/sub.php?menu_id=116. Accessed August 21, 2012.

Koebig & Koebig, Inc. 1970. *Adequacy of Water Supply, Ranch Oasis, State Highway 78, Imperial County*. Submitted to Theodore M. Jacobs (January 14, 1970).

Krieger & Stewart, Inc. 1995. *Hydrogeologic Investigation for Allegretti Farms, Western Imperial County, California*. (8012RPT1) Prepared for Allegretti & Company (November 1995).

Personal Communication – Cameron Bucher, Business and Regulatory Affairs Manager, ZGlobal Inc.; Seville Solar Farm One Representative, April 19, 2013.

Personal Communication – Joseph A. Allegretti, President and Chief Operating Officer, Allegretti & Company; April 22, 2013.

Personal Communication – Michael Morgan, Owner, Kelomer, Inc.; April 25, 2013.

Petra. 2012 *Preliminary Geotechnical Investigation, Proposed Seville Solar Energy Facility, Allegretti Farms Site, Located East of Ocotillo Wells and South of SR-78, Imperial County, California*. (J.N. 332-12). Submitted to Regenerate Power, LLC (December 27, 2012).

South West Pump & Drilling. 2008. *Allegretti Farms Well Synopsis for 2001-2008*.

USDA Soil Conservation Service. 1986. Irrigation Evaluation – Cooperator: Allegretti Farm. Evaluation Date – June 12, 1986.

14 FIGURES

Figure 1: Property Location Map – Seville Solar Farm One

Figure 2: Property on Topographic/Aerial Map - Seville Solar Farm One (Section Line Source: BLM Township and Range)

Figure 3: Parcel Map – Seville Solar Farm One (Parcel Information Source: Imperial County Assessor GIS Data)

Figure 4: Vicinity Zoning and Land Ownership Map – Seville Solar Farm One (Source: Imperial Count Zone 70 Map)

Figure 5: Ocotillo Wells State Vehicular Recreation Area (Adapted from California State Parks Map)

Figure 6: Wildcat Oil, Gas, and Geothermal Wells in the Property Vicinity (Adapted from CDOGGR Regional Wildcat Map W1-8)

Figure 7: Allegretti Farms Irrigation Pipeline Sketch

Phase I Environmental Site Assessment Seville Solar Farm One

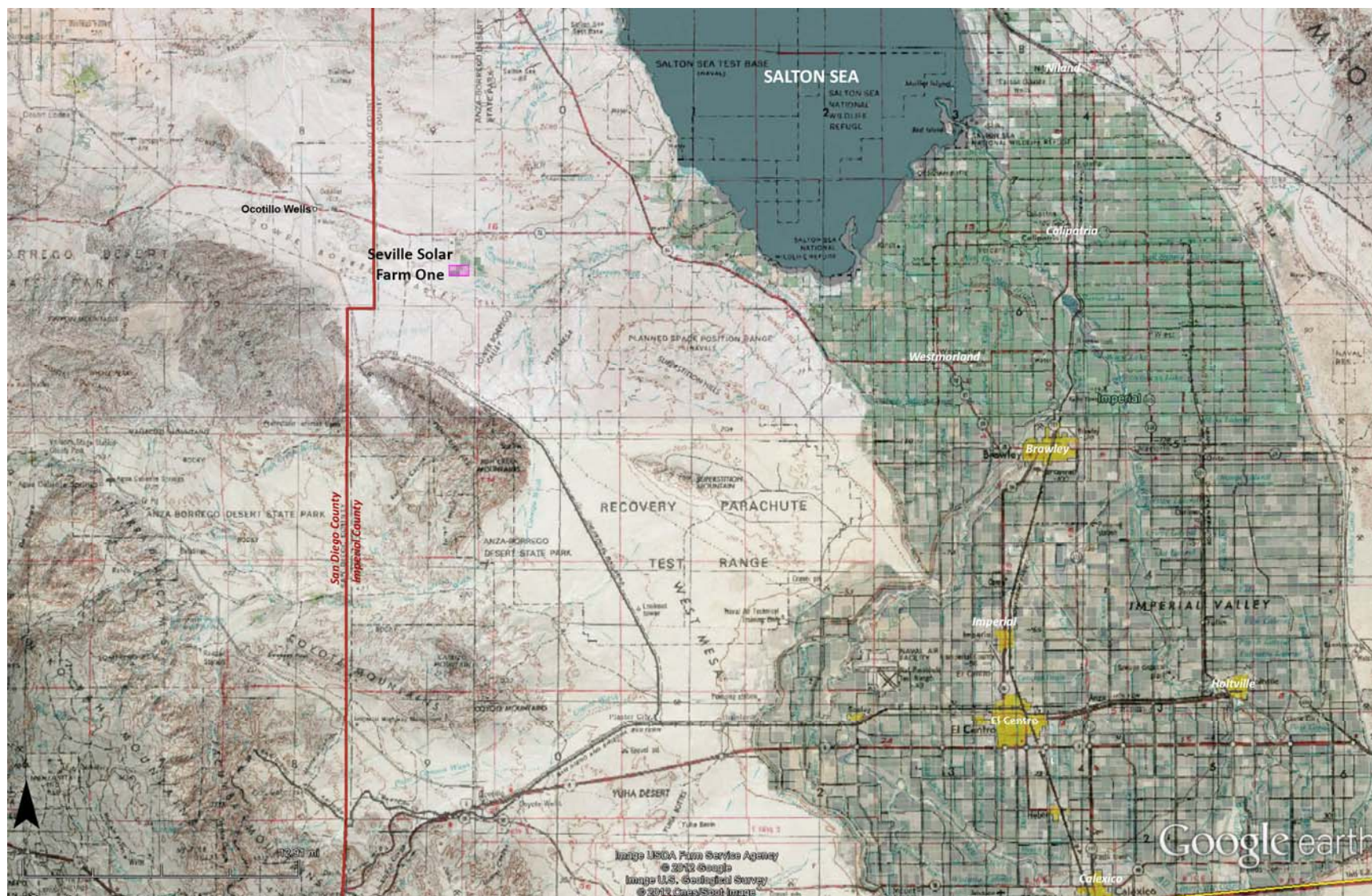


Figure 1: Property Location Map – Seville Solar Farm One

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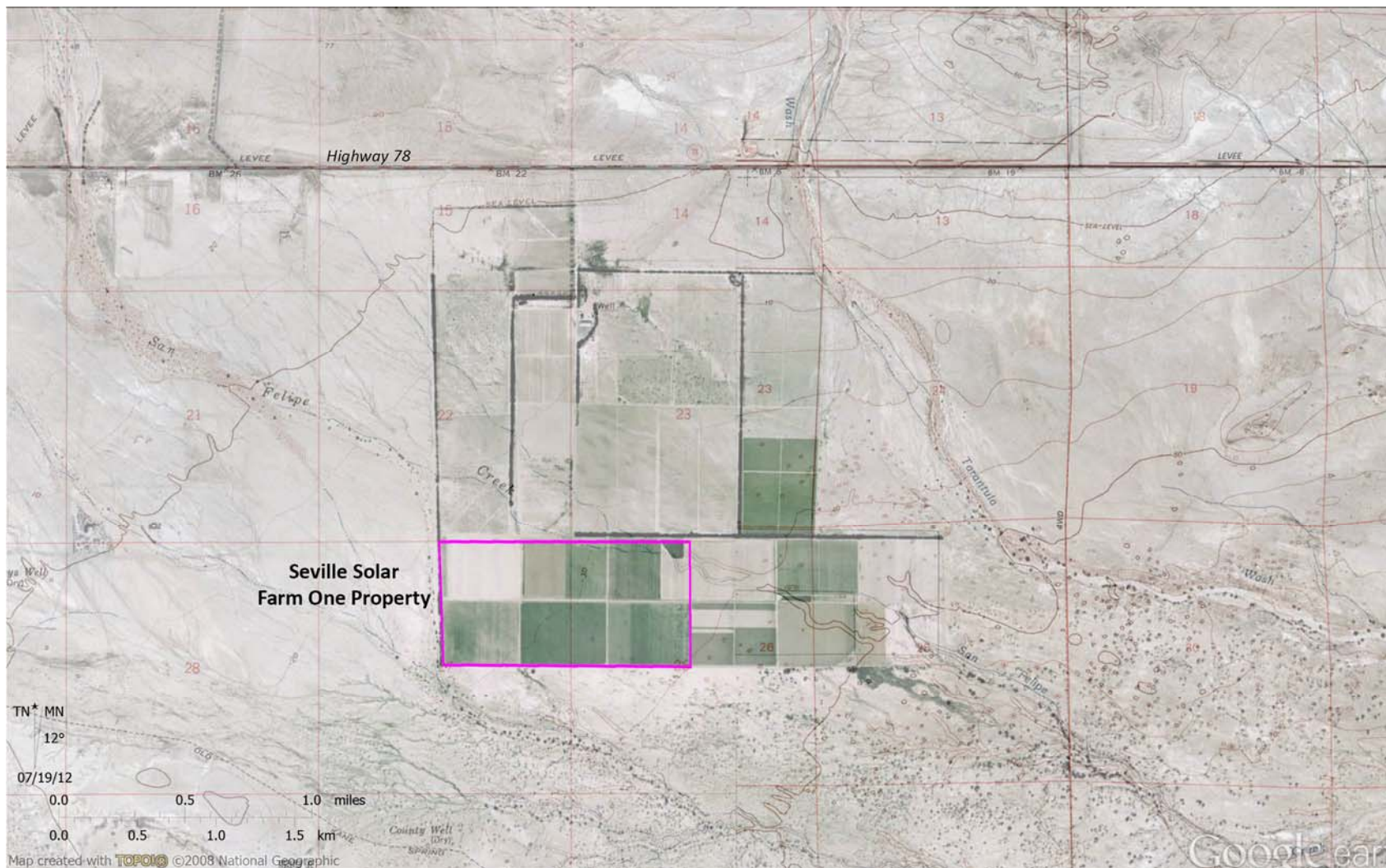


Figure 2: Property on Topographic/Aerial Map - Seville Solar Farm One (Section Line Source: BLM Township and Range)

Phase I Environmental Site Assessment
Seville Solar Farm One

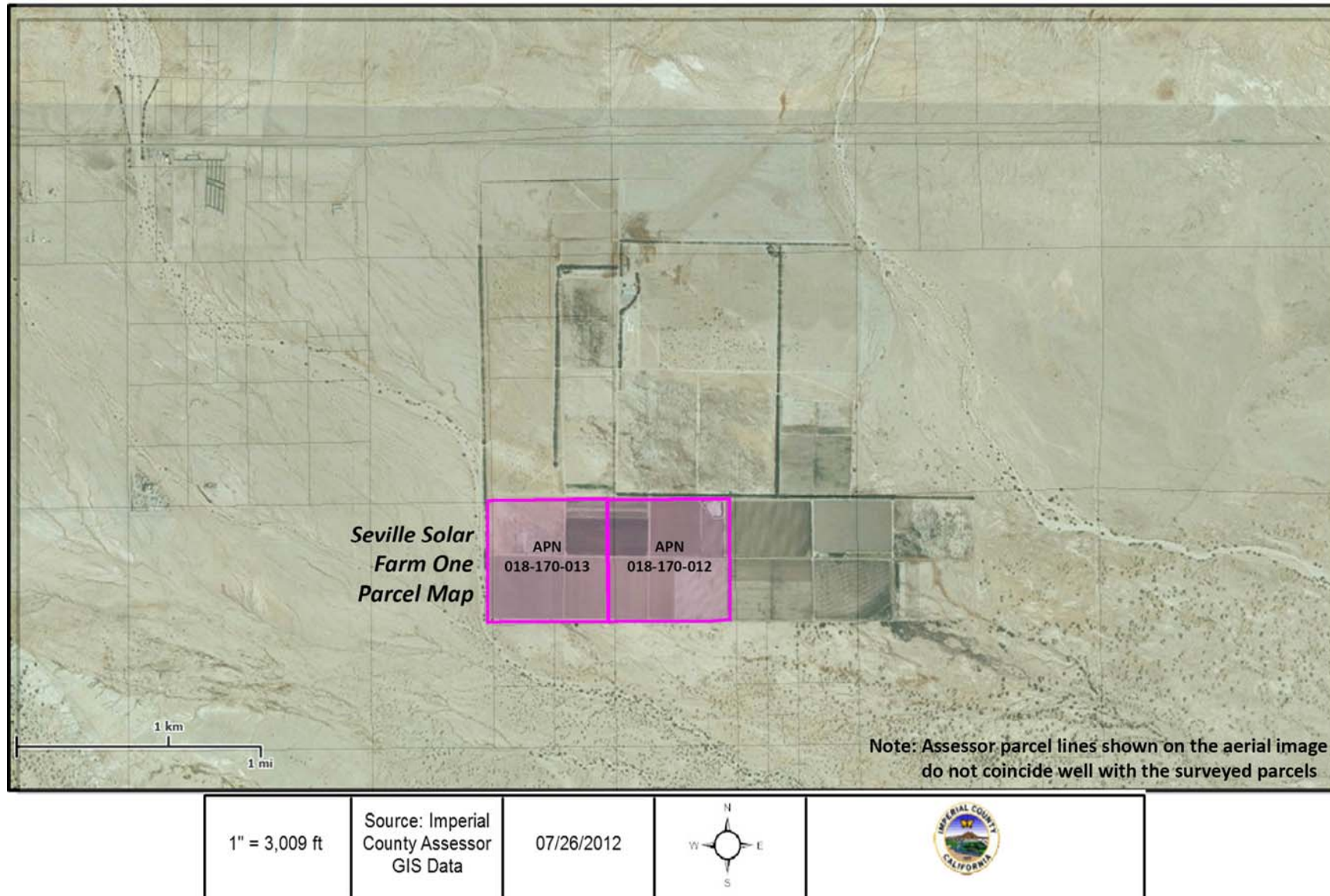


Figure 3: Parcel Map – Seville Solar Farm One (Parcel Information Source: Imperial County Assessor GIS Data)

Phase I Environmental Site Assessment Seville Solar Farm One

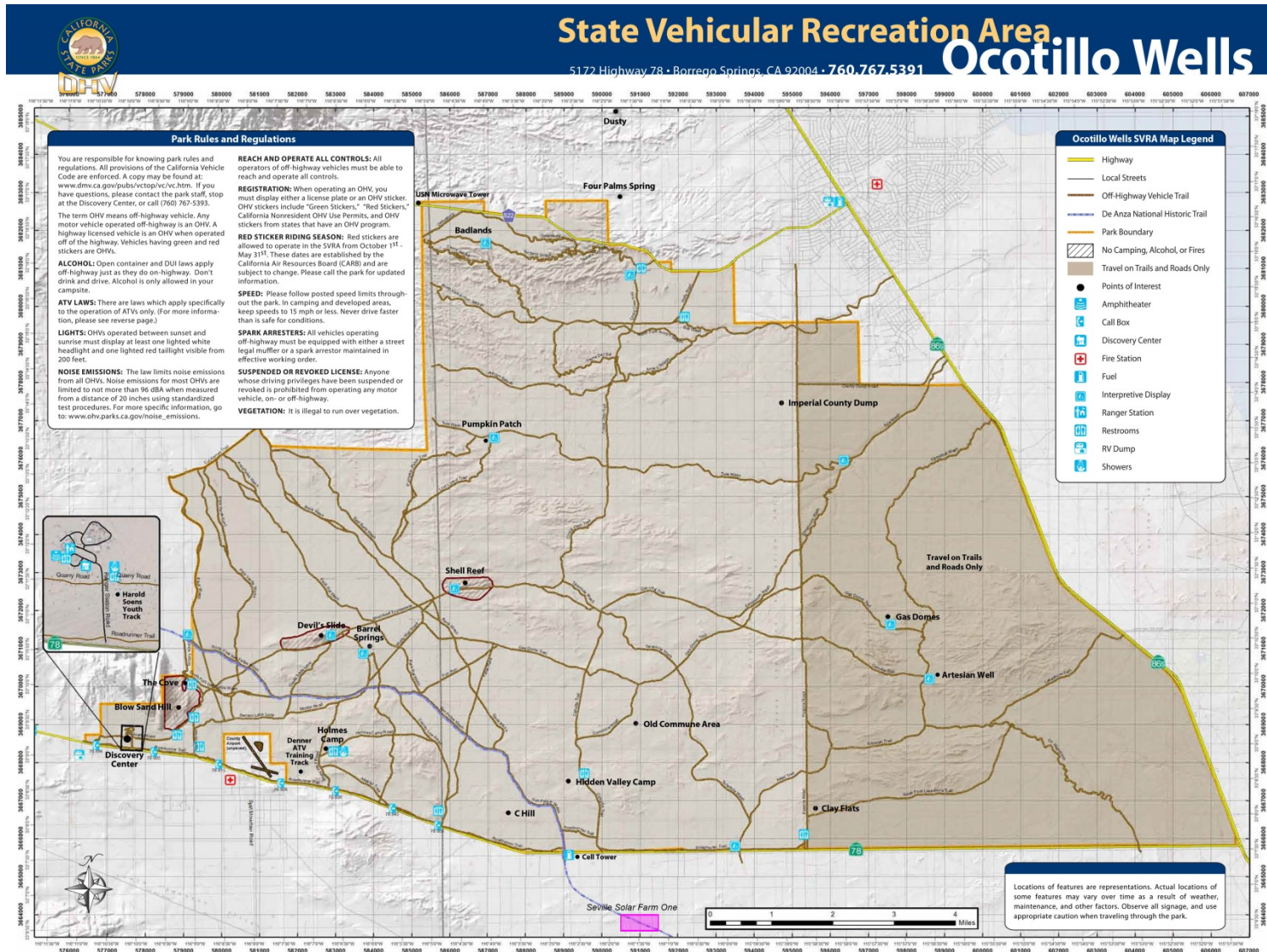


Figure 5: Ocotillo Wells State Vehicular Recreation Area (Adapted from California State Parks Map)

Phase I Environmental Site Assessment Seville Solar Farm One

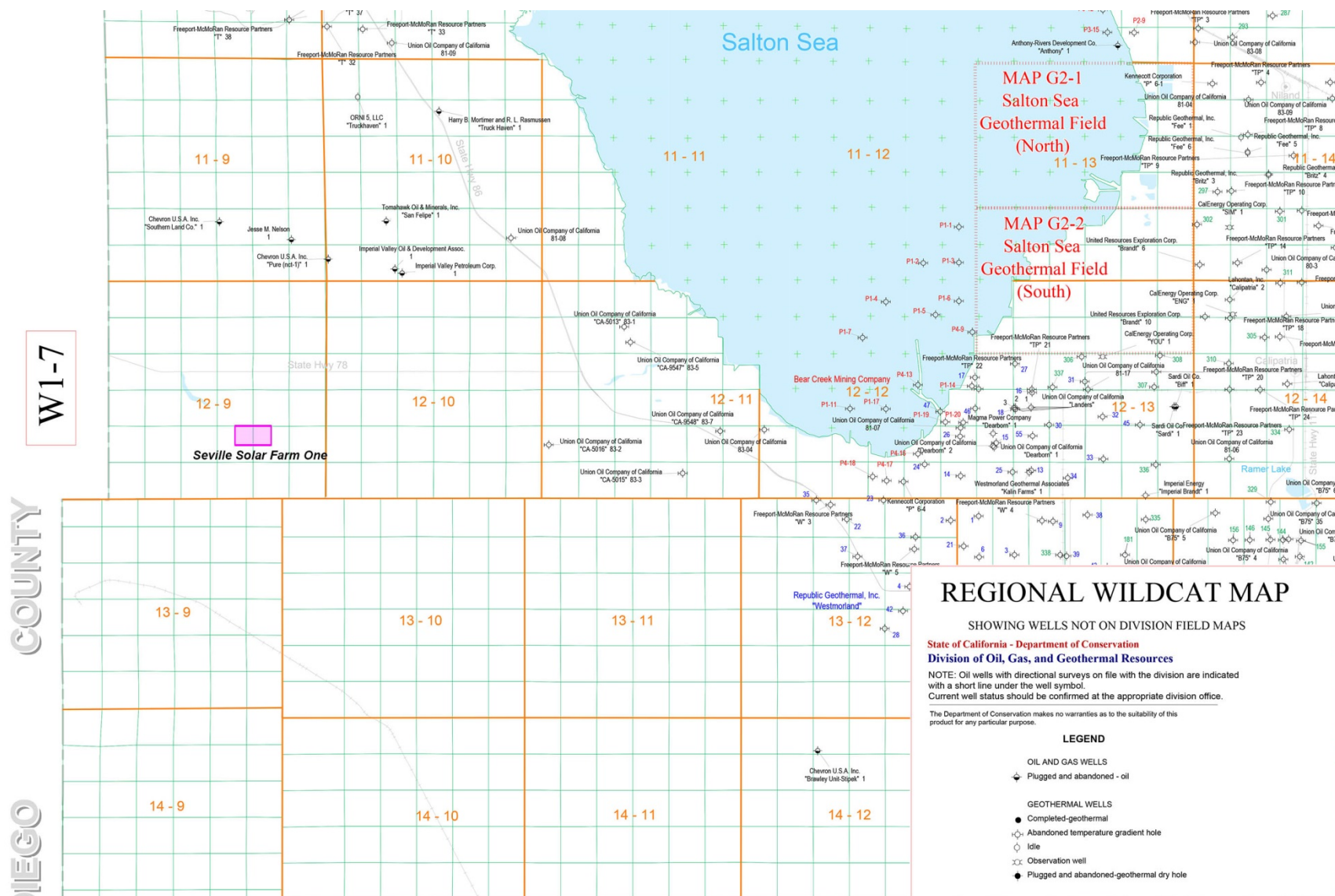


Figure 6: Wildcat Oil, Gas, and Geothermal Wells in the Property Vicinity (Adapted from CDOGGR Regional Wildcat Map W1-8)