

Phase I Environmental Site Assessment

High Desert Solar Project San Bernardino County, California

HDSI, LLC

AECOM Project Number: 60558522

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Quality information

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Executive Summary

AECOM Technical Services, Inc. (AECOM) prepared this Phase I Environmental Site Assessment (ESA) of the High Desert Solar Project, an approximately 607-acre Project Site with associated Gen-Tie and Service Line Corridors (located in San Bernardino County, California (Property)). The approximately 2.3 mile Gen-Tie Corridor runs east from the Project Site and then south. The approximately 1.7 mile Service Line Corridor runs along the Gen-Tie Corridor for the first mile and then diverges to the west to the Victorville Industrial Wastewater Treatment Facility southwest of the Project Site.

The purpose of the Phase I ESA was to gather information concerning the Property and surrounding areas in order to identify conditions indicative of releases or threatened releases of hazardous substances, pollutants, contaminants, petroleum or petroleum products, and controlled substances in order to identify and evaluate Recognized Environmental Conditions (REC) affecting the Property. This Phase I ESA was accomplished by, and limited to, a site reconnaissance, a site vicinity perimeter survey, and review of agency databases and other reasonably ascertainable records regarding past and current land use for indications of the manufacture, generation, use, storage and/or disposal of hazardous substances at the property. This Phase I ESA was performed in general conformance with the scope and limitations of ASTM Standard Practice Designation E 1527-13 for ESAs. Exceptions to, or deletions from, this practice are described in this report.

The Property consists of one non-contiguous parcel, 73 contiguous parcels (Project Site) and associated Gen-Tie and Service Line Corridors (that includes both the proposed and alternative routes) that transects 11 additional parcels (see Figures 1 and 2).

The Project Site includes Assessor's Parcel Numbers (APN) 046023201, 046023202, 046023203, 046023204, 046023232, 046023233, 046023206, 046023207, 046023208, 046023239, 046023240, 046023241, 046023213, 046023212, 046023211, 046023210, 046023209, 046023116, 046023215, 046023216, 046023217, 046023218, 046023219, 046023220, 046023221, 046023222, 046023117, 046023231, 046023230, 046023229, 046023228, 046023227, 046023226, 046023238, 046023223, 046023224, 046024201, 046024202, 046024203, 046024204, 046024206, 046024207, 046024208, 046024217, 046024216, 046024215, 046024214, 046024213, 046024212, 046024211, 046024210, 046024209, 046024218, 046024219, 046024220, 046024221, 046024235, 046024234, 046024233, 046024232, 046024230, 046024231, 046024226, 046024225, 046024224, 046024223, 046024236, 046024237, 046024238, 046011205, 046011215 and 046011216 and is located in Sections 1, 2, 11, and 14, Township 6 North, Range 5 West (USGS, Victorville, California 7.5-minute quadrangle), within the San Bernardino Base and Meridian. At the time of the site reconnaissance, the Project Site was observed to be approximately 670 acres of primarily undeveloped land bound by undeveloped land in all directions.

The Gen-Tie and Service Line Corridors traverse portions of APNs 046806102, 046806101, 046806111, 046806110, 046811115, 046811116, 046812101, 046823101, 046823124, 045903258 and 046823102 and are located in Sections 12, 13, and 24, Township 6 North, Range 5 West (USGS, Victorville, California 7.5-minute quadrangle), within the San Bernardino Base and Meridian. At the time of the site reconnaissance, the Gen-Tie and Service Line Corridors were observed to be primarily undeveloped land located within the former George Air Force Base (AFB). George AFB was an active base from the early 1940s until the early 1990s. Portions of the Property have been transferred to civilian ownership under the Base Realignment and Closure (BRAC) process and there are also some parcels that remain under the control of the Air Force Civil Engineer Center. Most of the activities conducted on the former George AFB parcels are related to aviation including the Southern California Logistics Airport (SCLA).

The Project Site is located immediately north of the SCLA and approximately three miles north of the existing High Desert Power Plant.

The northern portion of the Project Site appears to have had some historical development. Currently there is one structure associated with a pump station for an existing water line, and several abandoned structures, concrete slabs, water wells and trash and debris. The southern portion of the Project Site appears to have remained undeveloped land.

The Gen-Tie and Service Line Corridors appear to have remained undeveloped land with the exception of waste water evaporation ponds.

The Project Site area was not identified on any of the databases searched by Environmental Data Resources, Inc. (EDR). Several facilities were identified in the area of the Gen-Tie and Service Line Corridors (see Section 5.3, Database Information for details).

This assessment has revealed the following RECs in connection with the Property:

- Operating Unit 1 (OU1), a dissolved-phase trichloroethylene (TCE) plume, was identified in groundwater beneath the portion of the Gen-Tie and Service Line Corridors within the former George AFB area of the Property. A Groundwater Extraction and Treatment System (GETS) was installed in December 1991 and operated until it was shut down in March 2003. A Record of Decision (ROD) Amendment is reportedly in progress to evaluate how the selected remedy should be altered. Groundwater monitoring data indicate that the total area of the TCE plume is stable and that TCE concentrations are decreasing. Concentrations of TCE in groundwater exceed the TCE cleanup Maximum Contaminant Level (MCL) of 5 micrograms per liter ($\mu\text{g/L}$). The current remedial process is reportedly protective of human health and the environment because exposure to site contamination has been controlled. On-site worker inhalation hazards for on-site conditions are deemed protective for commercial/industrial land use (see Section 4.4, Previously Prepared Environmental Reports for additional information).
- OU3 Site LF014 was identified within a portion of the Gen-Tie and Service Line Corridors within the former George AFB area. Site LF014 is a landfill area that covers approximately 50 acres and is located in an unpaved, undeveloped area, some of which is traversed by the Gen-Tie and Service Line Corridors. The site is fenced and a landfill cover has been installed. Site LF014 was reportedly used for disposal of municipal and industrial wastes. Industrial wastes may have included lube oil, paint, lacquer, naphthalene, TCE, PD-680, cleaning compounds, hydraulic fluids, firefighting foams, batteries, oil spill absorbent, and general refuse. The volume of material disposed at the landfill is unknown. Removal actions were completed at the landfill between June 1996 and April 1997, including removing surface debris; rehabilitating the existing soil cover to an estimated thickness of 12 to 18 inches; grading the surface to promote surface runoff and decrease infiltration of surface water into the landfill; installing perimeter drainage ditches to minimize surface water from running onto the landfills and control surface water run-off from the landfills; installing site perimeter fencing to control site access; restricting land use to prohibit subsurface development; and reestablishing native plant species on the graded surface. Extensive cover repairs and improvements at Site LF014 were completed in April 2014 to address chronic erosion issues. Annual groundwater monitoring indicates potential degradation to groundwater from the landfill. The remedy at Site LF014 is reportedly protective of human health and the environment because the landfill covers and land-use restrictions effectively mitigate risk (see Section 4.4, Previously Prepared Environmental Reports for additional information).

This assessment has revealed no evidence of controlled RECs (CREC), historical RECs (HREC), or *de minimis* conditions in connection with the Property.

Based on these findings, no additional assessment is recommended.

1. Introduction

1.1 Purpose

The purpose of this Phase I ESA is to provide information for use in evaluating recognized environmental conditions (REC) associated with the Property.

Per the ASTM standard, potential findings can include RECs, including historical RECs (HREC), controlled RECs (CREC), and *de minimis* conditions. A REC is defined by the ASTM standard as:

- The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment.” The term includes hazardous substances or petroleum products even under conditions in compliance with laws.
- An HREC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.
- A CREC is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.
- A *de minimis* condition are those situations that do not present a material risk of harm to public health or the environment and generally would not be subject to enforcement action if brought to the attention of the regulating authority.

This assessment is based on a review of existing conditions, reported pre-existing conditions, and observed operations at the property and adjacent properties.

1.2 Scope of Work

The Phase I ESA included site visits, regulatory research, historical review, and a review and an environmental database analysis of the property. In conducting the Phase I ESA, AECOM assessed the Property for visible signs of possible contamination, researched public records for the Property and adjacent properties (as applicable), and conducted interviews with persons knowledgeable about the Property.

This Phase I ESA was performed in general accordance with ASTM Standard Practice Designation E 1527-13. Conclusions reached in this report are based upon the assessment performed and are subject to limitations set forth in Sections 1.3, 1.4, and 1.5 below.

1.3 Study Limitations

This report describes the results of AECOM's Phase I ESA to identify the presence of contamination-related liabilities materially affecting the facility and/or Property. In the conduct of this assessment, AECOM assessed the presence of such problems within the limits described herein.

As with any due diligence assessment, there is a certain degree of dependence upon oral information provided by facility or site representatives, which is not readily verifiable through visual observations or supported by any available written documentation. AECOM shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by facility or site representatives at the time this assessment was performed. In addition, the findings and opinions expressed in this report are subject to certain conditions and assumptions, which are noted in the report. Any party reviewing the findings of the report must carefully review and consider all such conditions and assumptions.

This report and all field data and notes were gathered and/or prepared by AECOM in accordance with the agreed upon scope of work and generally accepted engineering and scientific practice in effect at the time of AECOM's assessment of the Property. The statements, findings and opinions contained in this report are only intended to give approximations of the environmental conditions at the Property.

As specified in the ASTM standard (referred to below as "this practice"), it is incumbent that the client and any other parties who review and rely upon this report understand the following inherent conditions surrounding any Phase I ESA:

- **Uncertainty Not Eliminated.** No ESA can wholly eliminate uncertainty regarding the potential for REC in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for REC in connection with a property, and this practice recognizes reasonable limits of time and costs. (Section 4.5.1 of the ASTM standard)
- **Not Exhaustive.** "All appropriate inquiry" does not mean an exhaustive assessment of a clean property. There is a point at which the cost of information obtained outweighs the usefulness of the information and, in fact, may be a material detriment to the orderly completion of transactions. One of the purposes of this practice is to identify a balance between the competing goals of limiting the costs and time demands inherent in performing an ESA and the reduction of uncertainty about unknown conditions resulting from additional information. (Section 4.5.2 of the ASTM Standard)
- **Comparison with Subsequent Inquiry.** ESAs must be evaluated based on the reasonableness of judgments made at the time and under the circumstances in which they were made. Subsequent ESAs should not be considered valid standards to judge the appropriateness of any prior assessment based on hindsight, new information, use of developing technology or analytical techniques, or other factors. (Section 4.5.4 of the ASTM Standard)

A similar set of inherent limitations exist in cases where the Phase I ESA included a screening-level assessment of vapor migration or vapor encroachment; such an assessment is a required part of a Phase I ESA when the ASTM E1527-13 standard is employed. According to the ASTM E2600-15 Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions, the following limitations apply:

- **Uncertainty Not Eliminated in Screening.** No vapor encroachment screen (VES) can wholly eliminate uncertainty regarding the identifications of vapor encroachment conditions (VEC) in connection with the target property. (Section 4.5.1)
- **Not Exhaustive.** The guide is not meant to be an exhaustive screening. There is a point at which the cost of information obtained outweighs the usefulness of the information and, in fact, may be a material detriment to the orderly completion of real estate transactions. One of the purposes of this guide is to identify a balance between the competing goals of limiting the costs and time demands inherent in performing a VES and the reduction of uncertainty about unknown conditions resulting from additional information. (Section 4.5.2)

- **Comparison with Subsequent Investigations.** It should not be concluded or assumed that an investigation was not adequate because the investigation did not identify any VECs in connection with a property. The VES must be evaluated based on the reasonableness of judgments made at the time and under the circumstances in which they were made. Subsequent VESs should not be considered valid bases to judge the appropriateness of any prior screening if based on hindsight, new information, use of developing technology or analytical techniques, or similar factors. (Section 4.5.4)

This report was prepared pursuant to an agreement between HDSI, LLC (Client) and AECOM and is for the exclusive use of the Client. No other party is entitled to rely on the conclusions, observations, specifications, or data contained herein without first obtaining AECOM's written consent and provided any such party signs an AECOM-generated Reliance Letter. A third party's signing of the AECOM Reliance Letter and AECOM's written consent are conditions precedent to any additional use or reliance on this report.

The passage of time may result in changes in technology, economic conditions, site variations, or regulatory provisions, which would render the report inaccurate. Reliance on this report after the date of issuance as an accurate representation of current site conditions shall be at the user's sole risk.

1.4 Site-related Limiting Conditions

The following site-specific limitations were encountered during the course of this assessment:

- Due to the size and rugged nature of the Property, AECOM was unable to visually evaluate the entire Property. The site visit was accomplished by driving and walking access roads and trails that were abutting and transecting the Property. Based upon AECOM's historical research and the undeveloped nature of the Property, this particular site-related limiting condition is not expected to represent a significant limitation to this assessment.
- AECOM was not provided access to the interior of the active pump house structure during the site visit and due to the poor conditions of the abandoned residences/other support structures, a building walk through was not completed; however, interior conditions were generally visible from the exterior. This particular site-related limiting condition is not expected to represent a significant limitation to this assessment.

1.5 Data Gaps/Data Failure

The following data failure/data gaps were encountered during the course of this assessment:

- A title and environmental lien search were not conducted as part of this ESA. However, based upon historical data collected from other sources, this data gap is not expected to impact the results of this assessment. In addition, the user was not aware of environmental liens or activity use limitations (AULs) that have been placed on the Property.
- A limitation was encountered in determining the historical use of the Property. The earliest source of historical information reasonably ascertainable within the time frame of this report in which usage could be determined was an aerial photograph from 1953. At the time of the aerial photograph, the property and Gen-Tie and Service Line Corridors were depicted as undeveloped land. Therefore, the ASTM E1527 requirement to determine all obvious uses of the Property from the present back to the Property's first obvious developed use, or back to 1940, whichever is earlier, could not be achieved. However, based upon the identified undeveloped use, it is unlikely that there had been significant prior development; therefore, this data failure is not expected to impact the results of this assessment.

- It should be noted that not all standard historical sources, as defined per ASTM, were reviewed as part of this assessment. In addition to recorded land title records, zoning/land use records were not reviewed, and fire insurance maps are not available for the property area. Based on information provided from the remaining standard historical sources, additional historical information obtained from additional historical records would not likely have assisted in meeting the historical use requirement; therefore, this data gap is not expected to impact the results of this assessment.
- Per ASTM, past owners, operators, and occupants of the Property who are likely to have material information regarding the potential for contamination at the Property shall be contacted to the extent that they can be identified and that the information likely to be obtained is not duplicative of information already obtained from other sources. AECOM was not provided with contact information in order to interview past owners and/or operators at the Property. However, based upon historical data collected from other sources, this data gap is not expected to impact the results of this assessment.
- AECOM submitted a California Public Records Act request to the South Coast Air Quality Management District (AQMD) for information pertaining to air permits issued to the Property. The AQMD is unable to search for records by APN; a physical street address is required. Based on AECOM's research to date, it is AECOM's opinion that this data gap does not inhibit AECOM's evaluation for the potential RECs at the Property, and therefore it does not alter the conclusions of this report.
- AECOM submitted a California Public Records Act request to the Santa Ana Regional Water Quality Control Board (SARWQCB) for information pertaining to underground storage tanks (USTs) and septic tanks at the Property. The SARWQCB is unable to search for records by APN; a physical street address is required. Based on AECOM's research to date, it is AECOM's opinion that this data gap does not inhibit AECOM's evaluation for the potential RECs at the Property, and therefore it does not alter the conclusions of this report.

2. Site Description

2.1 Site Location and Parcel Description

The Project Site includes Assessor's Parcel Numbers (APN) 046023201, 046023202, 046023203, 046023204, 046023232, 046023233, 046023206, 046023207, 046023208, 046023239, 046023240, 046023241, 046023213, 046023212, 046023211, 046023210, 046023209, 046023116, 046023215, 046023216, 046023217, 046023218, 046023219, 046023220, 046023221, 046023222, 046023117, 046023231, 046023230, 046023229, 046023228, 046023227, 046023226, 046023238, 046023223, 046023224, 046024201, 046024202, 046024203, 046024204, 046024206, 046024207, 046024208, 046024217, 046024216, 046024215, 046024214, 046024213, 046024212, 046024211, 046024210, 046024209, 046024218, 046024219, 046024220, 046024221, 046024235, 046024234, 046024233, 046024232, 046024230, 046024231, 046024226, 046024225, 046024224, 046024223, 046024236, 046024237, 046024238, 046011205, 046011215 and 046011216 and is located in Sections 1, 2, 11, and 14 Township 6 North, Range 5 West (USGS, Victorville, California 7.5-minute quadrangle), within the San Bernardino Base and Meridian. At the time of the site reconnaissance, the Property was observed to be approximately 607 acres of primarily undeveloped land bound by undeveloped land in all directions.

The Gen-Tie and Service Line Corridors traverse portions of APNs 046806102, 046806101, 046806111, 046806110, 046811115, 046811116, 046812101, 046823101, 046823124, 046823102, and 045903258 and are located in Sections 12, 13, and 24, Township 6 North, Range 5 West (USGS, Victorville, California 7.5-minute quadrangle), within the San Bernardino Base and Meridian. The approximately 2.3-mile Gen-Tie Corridor runs east from the Project Site and then south. The approximately 1.7 mile Service Line Corridor runs along the Gen-Tie Corridor for the first mile and then diverges to the west to the Victorville Industrial Wastewater Treatment Facility southwest of the Project Site. At the time of the site reconnaissance, the Gen-Tie and Service Line Corridors were observed to be primarily undeveloped land.

A topographic map and an aerial map of the Project Site and Gen-Tie and Service Line Corridors are included as Figures 1 and 2, respectively.

2.2 Site Ownership

According to the San Bernardino County Assessor's Office, parcel ownership is as follows:

Parcel Owner	Assessor's Parcel Number
United States of America	046823101, 046823102, 046812101, 046823124
Victor Valley Wastewater Reclamation Authority	046811116, 046811115, 046806110, 046806111, 046806101
Intertechland and Desert Wind LLC	046806102, 046011216
Alliant Development Company LLC	046011215
The Camp and Julia Second Family LTD	046011205
City of Victorville	046023201, 046023202, 046023203, 046023204, 046023232, 046023233, 046023206, 046023207, 046023208, 046023239,

Parcel Owner	Assessor's Parcel Number
	046023240, 046023241, 046023213, 046023212, 046023211, 046023210, 046023209, 046023116, 046023215, 046023216, 046023217, 046023218, 046023219, 046023220, 046023221, 046023222, 046023117, 046023231, 046023230, 046023229, 046023228, 046023227, 046023226, 046023238, 046023223, 046023224, 046024206, 046024204, 046024203, 046024202, 046024201, 046024218, 046024219, 046024220, 046024221, 046024235, 046024234, 046024233, 046024232, 046024238, 046024237, 046024236, 046024223, 046024224, 046024225, 046024226, 046024230, 046024231
Christopher M. Iseman	046024208, 046024207
Stanley Hutchinson	045903258

2.3 Site Visit

Mr. Anthony Schuetze with AECOM's Santa Maria, California office conducted an unescorted site reconnaissance on May 3 and 4, 2018. Ms. Jennifer Guigliano with AECOM's San Diego, California office conducted an escorted site reconnaissance on July 11, 2018. Site-related limiting conditions encountered during this assessment are discussed in Section 1.4.

The site visit methodology consisted of walking over accessible areas of the Property, the perimeter, and portions of the surrounding area. The following sections summarize the results of the site visit.

2.3.1 Site and Facility Description

During the site reconnaissance, the Project Site was observed to contain one structure associated with a pump station for an existing water line, and several abandoned structures, concrete slabs, water wells and trash and debris on the northern portion of the Project Site. The southern portion of the Project Site contained several groundwater monitoring wells and underground utility lines but appeared to be mostly undeveloped land.

The Gen-Tie and Service Line Corridors appeared to have remained undeveloped land with the exception of waste water ponds and a power substation on the southern end.

2.3.2 Building Walk Through

Thirteen structures were observed on the northern portion of the Project Site. The only active structure was a pump house located southeast of the intersection of Helendale Road and Colusa Road. Access to this structure was not available during the site reconnaissance. The remaining 12 structures were abandoned residences or support structures and in varying levels of collapse. Due to the poor condition of these structures, building walk through was not completed, but interior conditions were generally visible from the exterior of the structures. The structures were in generally poor condition and contained abandoned or dumped household materials.

Additionally, 18 concrete slabs were observed on-site. No evidence was observed to indicate that structures associated with these slabs were developed.

2.3.3 Surrounding Properties

The Property is located within an area that is primarily undeveloped land. In general, prominent adjoining land uses are as follows:

- North: undeveloped land
- South: undeveloped land, George Air Force Base
- East: undeveloped land, reclamation ponds
- West: undeveloped land, SCLA

AECOM did not observe current gasoline service stations or current dry cleaners in the immediate vicinity (i.e., 500 feet) of the property. No sensitive receptors (i.e., schools, hospitals, water bodies, etc.) are located adjacent to the Property. Based on AECOM's site reconnaissance of the surrounding area, no off-site sources of concern were identified.

2.3.4 Petroleum Products and Hazardous Materials

Petroleum products and hazardous materials were not observed on the Property during the site reconnaissance.

Kinder Morgan Petroleum Pipeline Markers and Kern River Energy Gas Transmission Line Markers were observed within the Property boundary.

2.3.5 Drums and Other Chemical Containers

Drums were not observed, but several small one to five gallon containers consisting of paint and tar were observed on the Project Site during the site reconnaissance.

2.3.6 Polychlorinated Biphenyls

Electrical transformers, hydraulic equipment, capacitors, and similar equipment may contain PCBs as operating or dielectric insulating fluids within the units. The Federal Toxic Substances Control Act generally prohibited the domestic manufacture of PCBs after 1976; therefore, there is a potential for the dielectric fluid in electrical and hydraulic equipment manufactured prior to that date to contain PCBs.

Electric transmission lines and transformers were not observed on the Property during the site reconnaissance.

Hydraulic equipment (i.e., elevators, trash compactors, lifts) were not observed on the Property during the site reconnaissance.

2.3.7 Aboveground Storage Tanks

Aboveground storage tanks (AST) were not observed on the Property during the site reconnaissance.

2.3.8 Underground Storage Tanks

Evidence of underground storage tanks (i.e., vent pipes, fill ports) was not observed on the Property during the site reconnaissance. No known historical USTs were reported to exist on the Property.

2.3.9 Pits, Ponds, Lagoons, Septic Systems, Cisterns, Sumps, Drains, and Clarifiers

Evidence of pits, ponds, lagoons, cisterns, sumps, drains or clarifiers was not observed on the Property during the site reconnaissance, but several ponds associated with a wastewater treatment plant were observed adjacent to the Gen-Tie and Service Line Corridors. One restroom structure was observed on the Project Site. Septic systems associated with this restroom structure and other abandoned structures located on the Project Site are suspected, but no visible evidence of septic tanks was observed during the site reconnaissance.

2.3.10 Solid Waste

Waste generating activities were not observed on the Property during the site reconnaissance.

2.3.11 Hazardous Waste

Evidence of hazardous waste generation, storage, or disposal was not observed on the Property during the site reconnaissance.

2.3.12 Dumping

Large dumping areas were observed within the Project Site. These areas were adjacent and among several of the abandoned structures. The debris and trash consisted of wood, tile, roof shingles, concrete, drywall, brick, household furniture and appliances, tires, and other miscellaneous trash. The debris appeared to be a combination of building materials and household furniture from structures, from structure abandonment and collapse, and also dumping from offsite.

Minor trash including tires, glass bottles, and metal cans were also observed outside of the large dumping areas.

2.3.13 On-site Wells

Seven water wells were observed on the Project Site during the site reconnaissance. They appeared dry and ranged in depth from approximately 10 to 50 feet deep. The wells are suspected to be blocked or collapsed.

AECOM reviewed the California Department of Water Resources Well Data Library for evidence of wells on the Property. Two water wells were identified on the Project Site; one on the northeastern portion of the Property near Martin Hollow Road, and the one north of Shady Hill Road near the center of the Project Site.

Several groundwater monitoring wells were observed in the southern portion of the Property. The wells are reportedly associated with the former George AFB TCE plume identified beneath the Gen-Tie and Service Line Corridors (see Section 4.4 Previously Prepared Environmental Reports for additional information).

Oil and gas wells were not observed on the Property during the site reconnaissance.

AECOM reviewed the California Division of Oil, Gas, and Geothermal Resources (DOGGR) database to evaluate oil and gas exploration in the vicinity of the Property. No oil and gas wells were identified on the Property.

2.3.14 Water

A water pump station was observed in the southeast corner of Helendale Road and Colusa Road. A recycled water line oriented north-south was observed along the western boundary of the Property.

2.3.15 Wastewater

No wastewater discharges were observed at the Property during the site reconnaissance.

2.3.16 Stormwater

The Property is not connected to the municipal storm-water system.

2.3.17 Heating and Cooling

No structures requiring heating and cooling were observed on the Property during the site reconnaissance.

2.3.18 Pesticide Use

Historical agricultural use was not identified on the Property; therefore, pesticide use is not expected to have impacted the Property.

2.3.19 Staining and Discolored Soil/Surfaces

Staining and discolored soil/surfaces were not observed on the Property during the site reconnaissance.

2.3.20 Stressed Vegetation

Stressed vegetation was not observed on the Property during the site reconnaissance.

2.4 Non-scope Considerations

2.4.1 Asbestos

An Asbestos-containing Materials (ACM) Survey was not performed for this Phase I ESA. The use of asbestos was primarily discontinued after the late 1970s. There is the potential for ACM to be located within the abandoned residences and other support structures located on the Property.

2.4.2 Lead-based Paint

A Lead-based Paint (LBP) survey was not performed for this Phase I ESA. Concern for LBP is primarily related to older structures. There is the potential for LBP associated with the active pump house and abandoned residences/other support structures located on the Property.

2.4.3 Radon

A radon survey was not performed for this Phase I ESA. A USEPA survey by state and county of indoor radon concentrations indicated the radon zone level for San Bernardino County is 2. Zone 2 areas are predicted to have an indoor radon screening potential between 2.0 and 4.0 picocuries per liter (pCi/l) of air. The USEPA action level for radon is 4.0 pCi/l. Further assessment for radon appears unwarranted based on regional background levels.

2.5 Other Concerns

No other environmental concerns were noted or reported during the assessment.

3. Environmental Setting

3.1 Topography

The Property lies within the Mojave Desert in the Mojave River Valley and is bound by the San Gabriel Mountains to the south and southwest and the Tehachapi Mountains to the northwest and is relatively flat. Based on review of the USGS topographic maps of the site and vicinity, the elevation of the site ranges from approximately 2,660 to 2,790 feet above mean sea level (msl). Figure 1 presents the site topography at a 1:24,000 scale using recent USGS data.

3.2 Soil/Geology

The Property is located on the central portion of the Mojave Desert Geomorphic Province, bordering the Transverse Ranges. The Mojave Desert Geomorphic Province is characterized by broad expanses of desert with localized mountains and dry lakebeds. The province is bounded by the San Bernardino Mountains and the Pinto Fault to the south, the San Andreas Fault to the west, the Garlock Fault to the north and the Basin and Range Province to the east.

Most of the faults within the central Mojave Desert trend to the northwest, parallel to the San Andreas Fault Zone, and truncate against the Garlock Fault, trending to the northeast. The geologic units of the central Mojave Desert are divided into consolidated non-water-bearing rocks and water-bearing unconsolidated deposits. The site is underlain by Quaternary alluvium material consisting of thin surficial deposits, such as alluvial soils which are, in turn, underlain by older alluvial deposits at shallow depths. The older alluvial deposits consist of damp to saturated, loose to very dense, silty and clayey fine to coarse sand with occasional layers of gravel, silt and clay, and wet hard, fine sandy and silty clay.

3.3 Groundwater/Hydrology

The Property is located in the Upper Mojave River Valley Groundwater Basin. The basin is located within the South Lahontan Hydrologic Region and is designated as Basin Number 6-042. The Upper Mojave River Valley Groundwater Basin underlies an elongate north-south valley, with the Mojave River flowing (occasionally) through the valley from the San Bernardino Mountains on the south, northward into the Middle Mojave River Valley Groundwater Basin at the town of Helendale. The groundwater basin is bounded on the north by a roughly east-west line from basement rock outcrops near Helendale to those in the Shadow Mountains. The southern boundary is the contact between Quaternary sedimentary deposits and unconsolidated basement rocks of the San Bernardino Mountains. The basin is bound on the southeast by the Helendale fault and on the east by basement exposures of the mountains surrounding Apple Valley. In the west, the boundary is marked by a surface drainage divide between this basin and El Mirage Valley Basin, and a contact between alluvium and basement rocks that form the Shadow Mountains.

The two primary water-bearing units within the Mojave River Valley Basin system consist of regional Pliocene and younger alluvial fan deposits (fan unit) and of overlying Pliocene and younger river channel and floodplain deposits. Water-bearing deposits in this basin are predominantly unconfined, though some perched water appears near Adelanto.

Natural recharge of the basin is from direct precipitation, ephemeral stream flow, infrequent surface flow of the Mojave River, and underflow of the Mojave River into the basin from the southwest.

Complex stratigraphy controls the hydrogeology in the vicinity of George AFB. The sediments beneath the site have been divided into four primary units. These include the Upper Fluvial Unit, Middle Lacustrine Unit, Lower Lacustrine Unit and Lower Alluvial Unit. The Upper Fluvial and Lower Alluvial Units contain

the Upper Aquifer and Lower Aquifer respectively. Depth to groundwater in the Upper Aquifer ranges from approximately 45 to 168 feet below ground surface (bgs). Depth to groundwater in the Lower Aquifer ranges from approximately 60 to 300 feet bgs.

4. Site and Area History

AECOM reviewed readily available historical data pertaining to the Property. These references were reviewed for evidence of activities that would suggest the potential presence of hazardous substances at the property and to evaluate the potential for the property to be impacted by off-property sources of contamination. The objective of consulting historical sources is to develop a history of the previous uses of the property and surrounding area, in order to help identify the likelihood that past uses have resulted in RECs, CRECs, or HRECs in connection with the Property. The following subsections present a summary of the review results.

4.1 Historical Topographic Maps

AECOM reviewed the following USGS quadrangle maps of California provided in the EDR Historical Topo Map Report: Barstow (1932 and 1934), Adelanto (1956, 1968, 1993, and 2012), Victorville NW (1956, 1968, 1993, and 2012), Helendale (1956, 1968, 1993, and 2012), and Victorville (1956, 1968, 1993, and 2012). These maps provide topographic map coverage of the property and site vicinity (Appendix B). The following is a summary of the review:

- The maps depict the Property as undeveloped land. Victor Valley Wastewater Reclamation Authority and the Mojave River are depicted to the east of the property. SCLA and George AFB are depicted to the south of the property. United Islamic Youth Cemetery is depicted to the northwest of the Property.

4.2 Historical Aerial Photographs

The general type of activity and land use can often be discerned from the type and layout of structures visible in an aerial photograph; however, specific elements of a site operation cannot normally be determined from the photographs. Considering these conditions, AECOM reviewed historical aerial photographs dated 1953, 1968, 1978, 1985, 1994, 2005, 2010, and 2014 that were provided by EDR (Appendix C). The following is a summary of the review:

- 1953** The Project Site and adjacent properties appear to be undeveloped land. The Gen-Tie and Service Line Corridors appears to be undeveloped land. A runway and structures associated with George AFB is visible adjacent to the southwest of the southernmost portion of the Gen-Tie and Service Line Corridors.
- 1968** Several structures associated with rural development are visible near the center of the Project Site. The Gen-Tie and Service Line Corridors appears to be undeveloped land. Land disturbance associated with the Victor Valley Wastewater Reclamation Authority is visible to the east of the northernmost portion of the Gen-Tie Service Line Corridors.
- 1978** Structures/development is visible on the northern portion of the Project Site. The Gen-Tie and Service Line Corridors appears to be undeveloped land. Structures and additional land disturbance associated with the Victor Valley Wastewater Reclamation Authority is visible to the east of the northernmost portion of the Gen-Tie and Service Line Corridors.
- 1985** Additional structures/development is visible on the Project Site. The Gen-Tie and Service Line Corridors appears to be undeveloped land. Ponds associated with the Victor Valley Wastewater Reclamation Authority are visible to the east of the northernmost portion of the Gen-Tie and Service Line Corridors.
- 1994** No significant changes are observed to the Project Site or Gen-Tie and Service Line Corridors. Additional ponds/development associated with the Victor Valley Wastewater Reclamation

Authority is visible to the east of the northernmost portion of the Gen-Tie and Service Line Corridors.

- 2005** No significant changes are observed to the Project Site or Gen-Tie and Service Line Corridors. It appears since the 1994 photograph the structures in the center of the property have become abandoned and possibly demolished or collapsed. Dumping or debris from collapsed and abandoned structures appears visible around structures. Additional ponds/development associated with the Victor Valley Wastewater Reclamation Authority is visible to the east of the northernmost portion of the Gen-Tie and Service Line Corridors. Planes and roadways associated with the SCLA are observed in the site vicinity to the southwest of the Property. Additional structures/development associated with George AFB and the High Desert Solar Plant is visible adjacent to the southwest of the southernmost portion of the Gen-Tie and Service Line Corridors.
- 2010** No significant changes are observed to the Project Site, Gen-Tie and Service Line Corridors, adjacent properties, or site vicinity.
- 2014** No significant changes are observed to the Project Site, Gen-Tie and Service Line Corridors, adjacent properties, or site vicinity.

4.3 Sanborn Fire Insurance Maps

AECOM contracted with EDR to obtain Sanborn Fire Insurance Maps for the property. Based on EDR's search, Sanborn Fire Insurance Maps were not available for the Property.

4.4 Previously Prepared Environmental Reports

AECOM reviewed the Fourth Five-Year Review Report, Former George AFB, Victorville, California prepared by CB&I Federal Services LLC dated September 2016. The Five-Year Review is required by statute under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) to provide descriptions and evaluations of remedial actions at multiple contaminated sites at the former George AFB. According to the Report, there are three active Operating Units (OU) at George AFB: OU1, OU3, and OU5. Two OUs (OU2 and OU4) had been previously closed or are identified as non-CERCLA sites (during the Third Five-Year Review Report). The Five-Year Review is used to determine whether a remedy implemented at a site is or is expected to be protective of human health and the environment. OU5 was summarized as being closed in the Fourth Five-Year Review Report. Therefore, AECOM identified OU1 and OU3 as having the potential to impact the Property.

AECOM reviewed the 2016 Basewide Annual Monitoring and Operations Report for CERCLA and Non-CERCLA Sites for the Former George AFB, California, dated June 2017. The report presented data for groundwater, soil vapor monitoring soil vapor extraction, maintenance and monitoring to summarize the remedial status at George AFB. In 1990 the United States Environmental Protection Agency (EPA) evaluated George AFB and placed it on the National Priorities List (NPL). The U.S. Air Force (USAF) signed a Federal Facilities Agreement (FFA) with the EPA, the Department of Toxic Substance Control (DTSC) and the Regional Water Quality Control Board (RWQCB). The FFA established a framework for environmental restoration activities at George AFB. A comprehensive program is in place to monitor and maintain remedial systems at the former George AFB. Groundwater monitoring is performed through semiannual base-wide groundwater sampling.

OU1 consists of a dissolved-phase trichloroethylene (TCE) plume identified in groundwater beneath the northeast portions of the base and adjacent off-base area. A Groundwater Extraction and Treatment System (GETS) was installed in December 1991 and operated until it was shut down in March 2003. A Record of Decision (ROD) Amendment is reportedly in progress to evaluate how the selected remedy should be altered. A total of 232 pounds of TCE were removed from groundwater by the GETS between December 1991 and March 2003. Groundwater monitoring data indicate that the total area of the TCE

plume is stable and that TCE concentrations are decreasing. The TCE plume currently covers approximately 680 acres. The TCE plume is present in both the Upper Aquifer and the Lower Aquifer in the northeastern portion of George AFB. Concentrations in the Upper Aquifer and the Lower Aquifer continue to exceed the TCE cleanup Maximum Contaminant Level (MCL) of 5 micrograms per liter ($\mu\text{g/L}$). In most wells within the plume, TCE decreasing concentrations over the last 5 years indicate that degradation of the plume is occurring. Groundwater monitoring continues at the site. In 2014, the monitoring frequency was reduced from semiannual to annual. The current remedial process is reportedly protective of human health and the environment because exposure to site contamination has been controlled. On-site worker inhalation hazards for on-site conditions are deemed protective for commercial/industrial land use. There are reportedly no exposure pathways that could result in unacceptable risks and potential migration. Groundwater contaminants are being evaluated by long-term groundwater monitoring, data gap investigations, and groundwater fate and transport modeling. However, in order for the remedy to continue to be protective in the long term, the following actions are reportedly required to be taken: 1) Modify the OU1 remedy and document in a ROD Amendment; 2) Implement new remedy, and 3) Continue to research potential measures and pursue written agreements with federal, state, and local authorities that will improve the reliability of existing land-use restrictions that may include the preparation of a long-term management plan.

OU3 consists of 60 Installation Restoration Program (IRP) sites covering a variety of potential contaminant source areas, including landfills, other waste disposal and storage sites, fire training areas, spill sites, and leach fields. These sites are distributed throughout the former George AFB and range in size from a few hundred square feet to more than 90 acres. These sites have been designated as disposal pits, fire training sites, landfills, radiological waste sites, spill sites, storage tanks, waste pits, or "other". Site LF014 was the only site within OU3 that was identified within the Property boundary (within the Gen-Tie and Service Line Corridors). Site LF014 covers approximately 50 acres and is located in an unpaved, undeveloped area east of the runway and near Federal Aviation Administration (FAA) Gate 1. The site is fenced and a landfill cover has been installed. The USAF is responsible for maintenance of the landfill cover and groundwater monitoring. Between 1970 and 1976, Site LF014 was reportedly used for disposal of municipal and industrial wastes. Industrial wastes may have included lube oil, paint, lacquer, naphthalene, TCE, PD-680, cleaning compounds, hydraulic fluids, firefighting foams, batteries, oil spill absorbent, and general refuse. No burning of wastes was reported and a soil cover was placed over the wastes at the end of each day. Some materials may have been disposed at this site during the mid-1960s. The volume of material disposed at the landfill is unknown. Removal actions were completed at the landfill between June 1996 and April 1997, including removing surface debris; rehabilitating the existing soil cover to an estimated thickness of 12 to 18 inches; grading the surface to promote surface runoff and decrease infiltration of surface water into the landfill; installing perimeter drainage ditches to minimize surface water from running onto the landfills and control surface water run-off from the landfills; installing site perimeter fencing to control site access; restricting land use to prohibit subsurface development; and reestablishing native plant species on the graded surface. Extensive cover repairs and improvements at Site LF014 were completed in April 2014 to address chronic erosion issues. Principle repair and construction tasks included geosynthetic cover installation (prepared subgrade, a 50-mil linear low-density polyethylene geomembrane lower layer, an artificial turf upper layer, and an embedded infill material between the artificial turf blades), construction of three earthen detention berm, riprap channel repairs, riprap discharge pad construction, rock check dam construction, armoring of off-site channel by protecting the channel with the placement of geotextile and riprap, gabion installation, filling rills and gullies, wattle installation, fence repair, and hydroseeding. During inspections conducted subsequent to the completion of the extensive cover repairs and improvements, areas of erosion requiring repair were identified. The repairs performed in November and December 2014 included backfilling identified erosion areas with native material from Site LF014, installing additional gabions (constructed of wire baskets filled with riprap placed on top of a layer of geotextile) along the fence line, and installing additional synthetic wattle. Annual groundwater monitoring indicates potential degradation to groundwater from the landfill. Groundwater monitoring as specified in the amended monitoring programs was recommended be continued to detect potential changes in groundwater quality caused by infiltration and leaching from the

OU3 landfills. The remedy at OU3 - Site LF014 is reportedly protective of human health and the environment because the landfill covers and land-use restrictions effectively mitigate risk. However, in order for the landfill sites to continue to be protective in the long term, the following actions need to be taken: 1) Continue groundwater monitoring and inspections per the LTMMP and continue evaluation to determine whether impacts to groundwater are from Site LF014 or from another source; 2) Continue to research potential measures and pursue written agreements with federal, state, and local authorities that will improve the reliability of existing land-use restrictions that may include the preparation of a long-term management plan.

4.5 Summary of Historical Data

Based on AECOM's review of historical data, the Property has remained primarily undeveloped land.

Based on AECOM's review of historical data, adjacent properties have generally been undeveloped land and development associated with former George AFB, the High Desert Power Plant and the Victor Valley Wastewater Reclamation Authority.

5. Database and Records Review

5.1 User Provided Information

Section 6 of the ASTM Standard states that certain tasks, which will help to determine the possibility of RECs associated with the property, are generally conducted by the ESA report user. This includes the following: reviewing title records for environmental liens or activity and land use limitations and considering awareness of any specialized knowledge (e.g., information about previous ownership or environmental litigation), experience related to RECs at the property, or significant reduction in the purchase price of the property. Per the agreed scope-of-work, information related to these items should be provided by the ESA report user to AECOM.

To assist the user in gathering information that may be material to identifying RECs, AECOM provided the Client with the User Questionnaire from the ASTM Standard; the completed AAI User Questionnaire is included in Appendix E.

5.2 Title Records/Environmental Liens

An environmental lien search was not included in the Scope of Services performed for this Phase I ESA.

5.3 Database Information

In accordance with the scope of work and ASTM Standard E-1527-13, a search of various governmental databases was conducted by EDR. The site-specific DataMap Corridor Study/Radius Map Report/Area-Corridor Report was reviewed to evaluate if soil and or groundwater from an on-site and/or off-site source of concern has the potential to impact the property. The DataMap Corridor Study/Radius Map Report/Area-Corridor Report includes various reports detailing database information for each of the sites identified/geocoded within the specified radius. It should be noted that this information is reported as received by AECOM from EDR, which in turn reports information as provided in various government databases. It is not possible for either AECOM or EDR to verify the accuracy or completeness of information contained in these databases. However, the use of and reliance on this information is a generally accepted practice in the conduct of environmental due diligence.

A summary of AECOM's review and analysis of the site-specific DataMap Corridor Study/Radius Map Report/Area-Corridor Report is presented below. A copy of the DataMap Corridor Study/Radius Map Report/Area-Corridor Report is provided in Appendix D.

Based upon AECOM's review, there were no orphan sites identified in the database review.

Based on AECOM's research, the Property is not located on or within a 1-mile radius of tribal lands.

5.3.1 Subject Property

The Property was not identified on any of the databases searched by EDR. Areas within or adjacent to the Gen-Tie and Service Line Corridors were identified and are summarized below in Section 5.3.2, Surrounding Sites.

5.3.2 Surrounding Sites

According to the DataMap Corridor Study/Radius Map Report/Area-Corridor Report, several facilities were identified within their respective ASTM and/or EDR search distances from the Property:

Air Force Real Property Agency at 18374 Phantom Street, Victorville was identified on the following databases:

- National Priority List (NPL) (Superfund) – Identified with ID CA250700024453 with status reported as “Final”.
- Superfund Enterprise Management System (SEMS) – Identified with ID CA25070024453.
- Corrective Action Report (CORRACTS) – Identified with EPA ID CA2470024453. Action was reported as “certification of remedy completion or construction completion” as of December 30, 1996.
- Resource Conservation and Recovery Act-Treatment, Storage and Disposal (RCRA-TSDF) - Identified as a handler engaged in the treatment, storage or disposal of hazardous waste. Violations were reported for 1987, 1988, 1989, 1990, and 1992 for areas of violation of “generators-general”, “LDR-general”, “TSD-general”, and “TSD-closure/post V closure”.
- RCRA-Large Quantity Generator (LQG) – Identified as a “large quantity generator” of hazardous waste.
- Engineering Controls Sites (US ENG CONTROLS) – Engineering control reported as ‘soil vapor extraction (in-situ).
- Sites with Institutional Controls (US INST CONTROL) – Institutional controls reported as “water supply use restriction” on March 31, 1994, “deed restriction” on December 31, 1998, “groundwater use/well drilling regulation” on December 31, 1998, and “land use restriction” on December 31, 1998.
- Record of Decision (ROD)
- RCRA Administrative Action Tracking System (RAATS) – Status reported as “federal facility compliance agreement”.
- Historical Underground Storage Tank (HIST UST) – Identified with file number 00029B34 for two historical USTs.
- Potentially Responsible Parties (PRP)

George Air Force Base (closed) was identified on the Department of Defense (DOD) database. No additional information was provided.

VWRA Central Treatment Plant is located at 20111 Shay Road, Victorville. The facility was identified with ID 00000046659 on the HIST UST database for two historical USTs. No additional information was provided.

Victor Valley Wastewater Reclamation Authority at 20111 Shay Road, Victorville was identified on the following databases:

- National Pollutant Discharge Elimination System (NPDES) – Identified with number CAS000092 and a status of “terminated” on April 08, 2011.
- Cortese – No additional information was provided.
- HIST CORTESE – No additional information was provided.
- Leaking Underground Storage Tank (LUST) – Identified as a “cleanup site” with status of “completed-case closed” on November 23, 1992.

- HIST UST – No additional information was provided.
- California Hazardous Material Incident Report System (CHMIRS) – Identified with incident number 4-6775 on November 28, 2014 for a release of raw sewage when a storage basin wall ruptured allowing material to flow onto the soil. Identified with incident number 1-2656 on April 28, 2011 for a release of treated waste water when a wet well overflowed into the Mojave River. Identified with incident number 10-3733 on June 18, 2010 for a release of digester sludge when a power failure caused overflow from a drain sump into a storm drain that runs to the Mojave River. Identified with incident number 15-1657 on March 23, 2015 for a release of secondary affluent when a pump failure caused sewage to enter a storm drain that flows to the Mojave River. Identified with incident number 1-1119 on February 23, 2011 for a release of effluent water containing a higher content of chlorinated water to the Mojave River. Identified with incident number 1-1277 on March 2, 2011 for a release of undisinfected secondary effluent to the Mojave River when a contractor broke a 24-inch line. Identified with incident number 12-3485 on June 14, 2012 for a release of sewage to a storm drain that flows to the Mojave River.
- Aboveground Storage Tank (AST) – Identified with ID FA0007172; no additional information was provided.
- Enforcement Action Listing (ENF) – Identified with ID 270419; several notices of violation (NOV) are reported: for a missing spill report; an investigative order directing submittal of technical reports pertaining to a pipeline breach and subsequent raw sewage discharge; an untreated sewage overflow; for untimely submittal of quarterly status reports; for failure to properly maintain a disinfection system; to ensure effluent limits are met at all times; regarding chlorine residual effluent limits; untreated sewage overflow; for a discharger exceeding monthly TDS mass limits for several months; for chlorination equipment failure; for request to provide response to previous NOV; for request to submit a report; for unauthorized discharge of untreated sewage; for request of submittal of implementation plan and schedule; for a documents violation of chlorine residual effluent limits; requesting a letter of immediate actions taken to address cause of effluent limit violations; for influent flow rates exceeding permit limitations; requesting information regarding operating conditions.
- San Bernardino County Permit – Identified with “small quantity generator” permit number PT0035483, “hazardous materials 4-10 chemicals” permit number PT0035482, and “APSA 1,320-10,000 gallon facility capacity” permit number PT0035484.

Victor Valley Waste Water Reclamation Authority is located at 20111 Shay Road, Victorville. The facility was identified on the AST database for a 1,500 gallon AST.

Victor Valley Regional Compost at 20055 Shay Road, Victorville was identified on the following databases:

- Solid Waste Information System (SWF/LF) – Identified as a “permitted composting facility”.
- NPDES – Identified with number CAS000001; facility status is reported as “active” with a program type of “industrial”.
- AST – Identified with ID FA0016420; no additional information was provided.
- ENF - Identified with ID 270420; order requires submittal of technical reports to investigate the occurrence and movement of total dissolved solids, chloride, and arsenic in groundwater below the facility.

- San Bernardino County Permit – Identified with “small quantity generator” permit number PT0035312, “hazardous materials 4-10 chemicals” permit number PT0035311, and “AST general Activity” permit number PT0037522.
- HAZNET – Identified for waste categories “unspecified oil-containing waste, and “other organic solids” with disposal methods reported as “storage, bulking, and/or transfer off site-no treatment” and “landfill or surface impoundment that will be closed as a landfill”.
- Emissions Inventory Data (EMI) – Identified for 2012 and 2013 for Air District “Mojave Desert AQMD”.

Victor Valley Regional Composting Facility is located at 20055 Shay Road, Victorville. The facility was identified on the AST database for a 2,000-gallon AST.

George AFB Construction Debris (DP-03) is identified as a “solid waste disposal site” on the SWF/LF database. Operation status was reported as “closed”.

George AFB Construction Landfill (DP-04) is identified as a “solid waste disposal site” on the SWF/LF database. Operation status was reported as “closed”.

EOD Proficiency Range is identified as an “unexploded munitions and ordnance area” on the UXO database.

George AFB Disposal Site LF-14 (L-13) is identified as a “solid waste disposal site” on the SWF/LF database. Operation status was reported as “closed”.

163RW CA Ang Air Ops and Support Facility Social is identified as a “small quantity generator” of hazardous waste on the RCRA-SQG database. No violations were reported.

High Desert Power Project at 19000 Perimeter Road #101, Victorville is identified on the following databases:

- AST - for a 2,000-gallon AST.
- San Bernardino County Permit – Identified with “hazardous materials 31-50 chemicals” permit number PT0035342, “risk management plant-level II” permit number PT0035340, “APSA 10,001-100,000 gallon facility capacity” permit number PT0035343, “large quantity generator” permit number PT0035341, “hazardous materials 1-3 chemicals special” permit numbers PT0035672 and PT0035086, and “APSA 1,320-10,000 gallon facility capacity” permit number PT0037354.
- HAZNET – Identified for waste categories “other inorganic solid waste”, “laboratory waste chemicals”, and “unspecified aqueous solution” with disposal methods reported as “landfill or surface impoundment that will be closed as landfill”, “storage, bulking, and/or transfer off site-no treatment”, and “other recovery of reclamation for reuse including acid regeneration”.
- RCRA-LQG – Identified as a “large quantity generator” of hazardous waste; no violations were reported.
- Facility Index System (FINDS) – Identified with ID 110055800165.

Kern River Gas Transmission Co at 19000 Perimeter Road, Victorville was identified as an “automotive transmission repair shop” on the EDR Hist Auto database.

George AFB (LF-12) Disposal Site is identified as a “solid waste disposal site” on the SWF/LF database. Operation status is reported as “closed”.

George Air Force Base – OWS 768-S1 Metal Fabrication is identified on the following databases:

- Military Cleanup Sites (MCS) – Identified as a “military cleanup site” with a status of “open-site assessment” as of October 19, 2009.
- Deed Restriction Listing (DEED) – Identified as a DOD site with a Geotracker land use/deed restriction; status is reported as “open-site assessment”.

Victorville USARC is identified on the following databases:

- RCRA-SQG – Identified as a “small quantity generator” of hazardous waste; no violations were reported.
- FINDS – Identified with ID 110012188872.
- Enforcement and Compliance History Information (ECHO) – Identified with ID 1004678257.

Arakelian Enterprises, Inc. DBA American Organics at 20055 Shay Road is identified on the following databases:

- SWF/LF – Identified as a “permitted composting facility”.
- AST - No additional information was provided.
- EMI - Identified for 2012 and 2013 for Air District “Mojave Desert AQMD”.
- ENF - Identified with ID 270420
- HAZNET – Identified for waste categories “unspecified oil-containing waste, and “other organic solids” with disposal methods reported as “storage, bulking, and/or transfer off site-no treatment” and “landfill or surface impoundment that will be closed as a landfill”.
- NPDES – Identified with number CAS000001; facility status is reported as “active” with a program type of “industrial”.
- San Bernardino County Permit – Identified with “small quantity generator” permit number PT0035312, “hazardous materials 4-10 chemicals” permit number PT0035311, and “AST general Activity” permit number PT0037522.
- California Integrated Water Quality System (CIWQS) – Project types reported as “composting facility”, “industrial scrap and waste materials”, and “industrial refuse systems”.

OU1, a dissolved-phase TCE plume, and OU3 Site LF014, a former landfill, both associated with George AFB, have the potential to impact the property and are identified as RECs in connection with the property (see Section 4.4, Previously Prepared Environmental Reports for additional information).

5.4 Vapor Encroachment Screening

AECOM conducted a Tier 1 vapor encroachment screening (VES) as part of this assessment. This screening was conducted in general accordance with the ASTM E2600 *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions* dated October 2015. The objective of the VES was to determine if a VEC exists or if a VEC does not exist.

5.4.1 Subject Property

A dissolved-phase TCE plume was identified in groundwater beneath portions of the Gen-Tie and Service Line Corridors within the former George AFB area of the Property. Depth to groundwater in the Upper Aquifer ranges from approximately 45 to 168 feet bgs. Depth to groundwater in the Lower Aquifer ranges from approximately 60 to 300 feet bgs. The OU1 groundwater TCE plume is present in both the Upper

Aquifer and the Lower Aquifer in the northeastern portion of George AFB. Concentrations in the Upper Aquifer and the Lower Aquifer continue to exceed the TCE cleanup MCL of 5 micrograms per liter ($\mu\text{g/L}$). Groundwater monitoring data indicate that the total area of the TCE plume is stable and that TCE concentrations are decreasing. The current remedial process is reportedly protective of human health and the environment because exposure to site contamination has been controlled. On-site worker inhalation hazards for on-site conditions are deemed protective for commercial/industrial land use.

5.4.2 Off-site

To conduct the VES of the nearby area, AECOM conducted a detailed review and analysis of the site-specific DataMap Corridor Study/Radius Map Report/Area-Corridor Report with particular focus on the follow two types of sites:

1. Off-site properties that are impacted by chlorinated volatile organic compounds (VOC) and/or semi-volatile-organic compounds (SVOC) and are located within approximately 1,750 feet of the subject property, and
2. Off-site properties that are impacted by petroleum hydrocarbons and are located within approximately 525 feet of the property.

The following paragraph summarizes the results of AECOM's VES of the nearby area:

A review of the site-specific DataMap Corridor Study/Radius Map Report/Area-Corridor Report and the online GeoTracker database indicates that no VOC/SVOC and no petroleum hydrocarbon impacted sites are located with the above-described radii of the property other than OU1 and OU3 (see Section 4.4, Previously Prepared Environmental Reports for additional information). It is AECOM's opinion that a VEC at the property due to an off-site source does not exist.

5.5 Agency File Review

5.5.1 Local

AECOM contacted the San Bernardino County Fire Protection District – Hazardous Materials Division, the designated Certified Unified Program Agency (CUPA), to determine if they have files related to hazardous materials, hazardous waste, ASTs, and USTs at the Property. The CUPA provided AECOM with a Certified Records Search Finding Report. The Report included information regarding spill notifications at the Victor Valley Wastewater Reclamation Authority facility including releases of secondary treated sewage to the ground and storm drains leading to the Mojave River. No additional information was provided.

AECOM contacted the Santa Ana Regional Water Quality Control Board for information pertaining to USTs and septic tanks at the Property. The SARWQCB was not able to search for information by provided APN; a physical street address is required.

AECOM contacted the South Coast Air Quality Management District (AQMD) for information pertaining to air permits issued to the Property. The AQMD is unable to search for records by APN; a physical street address is required.

5.5.2 State

AECOM searched the Department of Toxic Substances Control (DTSC) online EnviroStor database for California Cleanup Sites involving the DTSC. The EnviroStor database consists of federal NPL sites, state response sites, voluntary cleanup sites, and school cleanup sites. The Property was not identified on the EnviroStor database.

AECOM searched the California EPA's State Water Resources Control Board online GeoTracker database. The GeoTracker database regards contaminated property investigations consisting of Leaking Underground Fuel Tank (LUFT), Spills, Leaks, Investigations and Cleanups (SLIC), Land Disposal, DOD (non-UST), Wells, and UST sites at sites throughout California. The Property was not identified on the GeoTracker database.

AECOM reviewed maps available on the State of California, Department of Conservation, DOGGR website for information regarding oil wells located at the Property. No oil wells were identified on or adjacent to the Property. The Property is not located within an oil field.

5.5.3 Federal

AECOM searched the U.S. EPA's Enforcement and Compliance History Information (ECHO) database. The ECHO database provides integrated compliance and enforcement information for about 800,000 regulated facilities nationwide. The Property was not listed on the ECHO database.

AECOM searched the U.S. EPA's Envirofacts database. The Envirofacts database retrieves information obtained from 17 national systems, including the CERCLIS, Superfund program (NPL sites), hazardous waste sites, and potential hazardous waste sites. The Property was not listed on the Envirofacts database.

AECOM searched the U.S. EPA's Superfund Enterprise Management System (SEMS) database. The SEMS database replaced the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) which has since been retired. SEMS includes the same data fields and content as CERCLIS. The Property was not listed on the SEMS database.

6. Findings and Opinions

AECOM performed a Phase I ESA of the property in conformance with the scope and limitations of ASTM Practice E 1527-13, which meets the requirements of Title 40, Code of Federal Regulations Part 312 and is intended to constitute all appropriate inquiry for purposes of the landowner liability protections. Any exceptions to, or deletions from, this practice are described in Section 1.3 through 1.5 of this report.

The following sections summarize the findings and opinions of this Phase I ESA of the Property.

6.1 Recognized Environmental Conditions

Based on the above-described activities, the following RECs were identified in connection with the Property.

- OU1, a dissolved-phase TCE plume, was identified in groundwater beneath the portion of the Gen-Tie and Service Line Corridors within the former George AFB area of the property. A GETS was installed in December 1991 and operated until it was shut down in March 2003. A ROD Amendment is reportedly in progress to evaluate how the selected remedy should be altered. Groundwater monitoring data indicate that the total area of the TCE plume is stable and that TCE concentrations are decreasing. Concentrations of TCE in groundwater exceed the TCE cleanup MCL of 5 (µg/L). The current remedial process is reportedly protective of human health and the environment because exposure to site contamination has been controlled. On-site worker inhalation hazards for on-site conditions are deemed protective for commercial/industrial land use (see Section 4.4, Previously Prepared Environmental Reports for additional information).
- OU3 Site LF014 was identified within a portion of the Gen-Tie and Service Line Corridors within the former George AFB area of the property. Site LF014 is a landfill area that covers approximately 50 acres and is located in an unpaved, undeveloped area located within the Gen-Tie and Service Line Corridors. The site is fenced and a landfill cover has been installed. Site LF014 was reportedly used for disposal of municipal and industrial wastes. Industrial wastes may have included lube oil, paint, lacquer, naphthalene, TCE, PD-680, cleaning compounds, hydraulic fluids, firefighting foams, batteries, oil spill absorbent, and general refuse. The volume of material disposed at the landfill is unknown. Removal actions were completed at the landfill between June 1996 and April 1997, including removing surface debris; rehabilitating the existing soil cover to an estimated thickness of 12 to 18 inches; grading the surface to promote surface runoff and decrease infiltration of surface water into the landfill; installing perimeter drainage ditches to minimize surface water from running onto the landfills and control surface water run-off from the landfills; installing site perimeter fencing to control site access; restricting land use to prohibit subsurface development; and reestablishing native plant species on the graded surface. Extensive cover repairs and improvements at Site LF014 were completed in April 2014 to address chronic erosion issues. Annual groundwater monitoring indicates potential degradation to groundwater from the landfill. The remedy at Site LF014 is reportedly protective of human health and the environment because the landfill covers and land-use restrictions effectively mitigate risk (see Section 4.4, Previously Prepared Environmental Reports for additional information).

6.2 Controlled Recognized Environmental Conditions

Based on the above-described activities, no CRECs were identified in connection with the Property.

6.3 Historical Recognized Environmental Conditions

Based on the above-described activities, no HRECS were identified in connection with the Property.

6.4 De Minimis Conditions

Based on the above-described activities, no *de minimis* conditions were identified in connection with the Property.

7. Conclusions

AECOM performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527-13 of High Desert Solar Project Site located in San Bernardino County, California. Any evidence to, or deletions from, this practice are described in Sections 1.3 through 1.5 of this report.

This assessment has revealed the following RECS in connection with the Property:

- OU1, a dissolved-phase TCE plume, was identified in groundwater beneath the portion of the Gen-Tie and Service Line Corridors within the former George AFB area of the property. A GETS was installed in December 1991 and operated until it was shut down in March 2003. A ROD Amendment is reportedly in progress to evaluate how the selected remedy should be altered. Groundwater monitoring data indicate that the total area of the TCE plume is stable and that TCE concentrations are decreasing. Concentrations of TCE in groundwater exceed the TCE cleanup MCL of 5 µg/L. The current remedial process is reportedly protective of human health and the environment because exposure to site contamination has been controlled. On-site worker inhalation hazards for on-site conditions are deemed protective for commercial/industrial land use (see Section 4.4, Previously Prepared Environmental Reports for additional information).
- OU3 Site LF014 was identified within a portion of the Gen-Tie and Service Line Corridors within the former George AFB area of the property. Site LF014 is a landfill area that covers approximately 50 acres and is located in an unpaved, undeveloped area located within the Gen-Tie and Service Line Corridors. The site is fenced and a landfill cover has been installed. Site LF014 was reportedly used for disposal of municipal and industrial wastes. Industrial wastes may have included lube oil, paint, lacquer, naphthalene, TCE, PD-680, cleaning compounds, hydraulic fluids, firefighting foams, batteries, oil spill absorbent, and general refuse. The volume of material disposed at the landfill is unknown. Removal actions were completed at the landfill between June 1996 and April 1997, including removing surface debris; rehabilitating the existing soil cover to an estimated thickness of 12 to 18 inches; grading the surface to promote surface runoff and decrease infiltration of surface water into the landfill; installing perimeter drainage ditches to minimize surface water from running onto the landfills and control surface water run-off from the landfills; installing site perimeter fencing to control site access; restricting land use to prohibit subsurface development; and reestablishing native plant species on the graded surface. Extensive cover repairs and improvements at Site LF014 were completed in April 2014 to address chronic erosion issues. Annual groundwater monitoring indicates potential degradation to groundwater from the landfill. The remedy at Site LF014 is reportedly protective of human health and the environment because the landfill covers and land-use restrictions effectively mitigate risk (see Section 4.4, Previously Prepared Environmental Reports for additional information).

No evidence of CRECs, HRECs or *de minimis* conditions were identified in connection with the Property.

7.1 Recommendations

RECs associated with the Property (OU1 and OU3) are being assessed and remediated by the USAF. Coordination with the USAF should occur prior to ground disturbing activities in the area of identified impacts.

AECOM recommends that the debris/trash be removed and disposed of. If containers of hazardous materials, drums, visibly stained soils, or other suspicious materials are observed during removal activities, further soil assessment or soil sampling is recommended.

As discussed in Section 2.3.13, On-site Wells water supply wells are located on the Project Site. If these wells are not planned for future use, they should be properly abandoned in accordance with San

Bernardino County regulations for the construction, modification, or destruction and inactivation of water wells.

An ACM/LBP Survey should be performed on the Property prior to demolition/removal of structures. If ACM/LBP is confirmed on the Property, it should be handled by a licensed ACM/LBP contractor and disposed of according to appropriate regulations.

8. Environmental Professional Statement

Mr. David Bernal was the Environmental Professional (EP) for this project. Mr. Bernal's EP statement is below and his resume is provided in Appendix F.

I declare that, to the best of my professional knowledge and belief, I meet the definition of an EP as defined in §312.10 of 40 Code of Federal Regulations (CFR) and that I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Signature: 

Date: October 17, 2018

9. References

- ASTM International (ASTM). 2013. Standard E 1527-13, “*Standard Practice for Environmental Site Assessment: Phase I Environmental Site Assessment Process.*” November.
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- California Department of Water Resources (DWR). 2018. *Water Data Library*. From the web page: <http://www.water.ca.gov/waterdatalibrary/index.cfm>. April.
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- CB&I Federal Services, LLC. 2016. *Fourth Five-Year Review Report, Former George AFB, Victorville, California*. September
2017. 2016 Basewide Annual Monitoring and Operations Report for CERCLA and Non-CERCLA Sites for the Former George AFB, California. July.
- Environmental Data Resources, Inc. (EDR). 2018a. *EDR DataMap Corridor Study*, Inquiry Number: 5272585.7s. April 27.
- 2018b. *EDR Radius Map Report*, Inquiry Number: 5293256.2s. May 14.
- 2018c. *EDR Aerial Photo Decade Package*, Inquiry Number: 5272585.9. May 2.
- 2018d. *EDR Historical Topo Map Report*, Inquiry Number: 5272585.5. April 26.
- 2018e. *EDR Area/Corridor Report*, Inquiry Number: 5387100.5s. August 9.
- Federal Register. 2005. Vol. 70, No. 210. U.S. Environmental Protection Agency. *Standards and Practices for All Appropriate Inquiries; Final Rule* (40 CFR Part 312). November 1, amended December 30, 2013.
- U.S. Air Force Civil Engineer Center online database. 2018. From the web page: <http://afcec.publicadmin-record.us.af.mil/Search.aspx>. May.
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- 2018b. *Enforcement and Compliance History Information (ECHO) Database*. From the web page: <http://echo.epa.gov/?redirect=echo>. April.

2018c. *Envirofacts Multisystem Database*. From the web page: <https://www3.epa.gov/enviro/>. April.

2018d. *Superfund Enterprise Management System (SEMS) Database*. From the Web Page: <https://cumulis.epa.gov/supercpad/cursites/srchsites.cfm>. April.

9.1 Persons Interviewed

AECOM conducted an interview with Ms. Jennifer Thompson, Management Specialist with the City of Victorville and site representative for APNs 046023201, 046023202, 046023203, 046023204, 046023232, 046023233, 046023206, 046023207, 046023208, 046023239, 046023240, 046023241, 046023213, 046023212, 046023211, 046023210, 046023209, 046023116, 046023215, 046023216, 046023217, 046023218, 046023219, 046023220, 046023221, 046023222, 046023117, 046023231, 046023230, 046023229, 046023228, 046023227, 046023226, 046023238, 046023223, 046023224, 046024206, 046024204, 046024203, 046024202, 046024201, 046024218, 046024219, 046024220, 046024221, 046024235, 046024234, 046024233, 046024232, 046024238, 046024237, 046024236, 046024223, 046024224, 046024225, 046024226, 046024230, 046024231. Ms. Thompson provided information regarding the historical and current conditions of the City of Victorville property. Ms. Thompson indicated that the City of Victorville APNs were privately owned and were undeveloped or used as residential use prior to purchase of the parcels by the City of Victorville in approximately 2003-2005. Ms. Thompson indicated that there are no known environmental concerns associated with the City of Victorville property.

AECOM conducted an interview with Mr. Calvin Cox, with SpecPro Professional Services, LLC and site representative for the USAF for APNs 046823101, 046823102, 046812101, and 046823124. Mr. Cox provided information regarding the historical and current conditions of the Former George AFB. Mr. Cox indicated that the Gen-Tie and Service Line Corridors parcels are currently and have historically been undeveloped. Mr. Cox provided the link to the USAF Administrative Record online database. AECOM reviewed reports regarding the historical and ongoing environmental assessment and remediation on the former George AFB. Applicable documents are summarized in Section 4.4, Previously Prepared Environmental Reports.

AECOM conducted an interview with Mr. Logan Olds, General Manager of the Victor Valley Wastewater Reclamation Authority, and site representative for 046811116, 046811115, 046806110, 046806111, and 046806101. Mr. Olds provided information regarding the historical and current conditions of the parcels. Mr. Olds stated that to his knowledge there are no known environmental concerns associated with these parcels.

AECOM conducted an interview with Ms. Linda Iseman, site representative for APNs 046024208 and 04602407. Ms. Iseman provided information regarding the historical and current conditions of the property. Ms. Iseman indicated that the property consists of primarily undeveloped land, but may include a historical residence and a barn. Ms. Iseman stated that the property has a water well and a septic system and that to her knowledge, there are no known environmental concerns associated with these parcels.

AECOM conducted an interview with Mr. Harold Wright, site representative for APNs 046806102 and 046011216. Mr. Wright provided information regarding the historical and current conditions of the property. Mr. Wright indicated the property consists of undeveloped land, and that to his knowledge, there are no known environmental concerns associated with these parcels.

AECOM conducted an interview with Mr. Nassim Bayat, site representative for APN 046011215. Mr. Bayat provided information regarding the historical and current conditions of the property. Mr. Bayat indicated the property consists of undeveloped land, and that to his knowledge, there are no known environmental concerns associated with this parcel.

AECOM conducted an interview with Ms. Joy Wu, site representative for APN 046011205. Ms. Wu provided information regarding the historical and current conditions of the property. Ms. Wu indicated the

property consists of undeveloped land with monitoring wells installed/monitored by the USAF. Ms. Wu indicated that to her knowledge, there are no known environmental concerns associated with this parcel.

Figures

Appendix A Site Photographs

Appendix B Historical Topo Map Report

Appendix C Aerial Photo Decade Package

Appendix D DataMap Corridor Study/Radius Map Report/Area-Corridor Report

Appendix E AAI User Questionnaire

Appendix F Qualifications of Environmental Professional

