

PHASE I ENVIRONMENTAL SITE ASSESSMENT

OF THE PROPERTY KNOWN AS:

**COTTONWOOD GOLF COURSE
3121 Willow Glen Drive
El Cajon, California 92019**

Prepared for:

**New West Investment, Inc.,
Cottonwood Cajon ES, LLC and
EnviroMINE Inc.
3511 Camino Del Rio South
Suite 403
San Diego, CA 92108**

Prepared by:

**ROYAL ENVIRONMENTAL SERVICES, INC.
4704 50th Street
San Diego, California 92115
Phone (619) 985-6363**

**As of:
October 27, 2020**

**This report was prepared for the sole use of the party noted within.
No part of this report may be used, relied upon, or reproduced
without the express written consent of Royal Environmental Services, Inc.**

1.0	EXECUTIVE SUMMARY	1
2.0	INTRODUCTION.....	2
2.1	PURPOSE OF ASSESSMENT	2
2.2	SPECIAL TERMS AND CONDITIONS	2
2.3	LIMITATIONS AND EXCEPTIONS	3
3.0	SITE DESCRIPTION	5
3.1	LOCATION.....	5
3.2	SITE AND VICINITY CHARACTERISTICS.....	5
3.3	DESCRIPTION OF STRUCTURES AND OTHER IMPROVEMENTS	5
3.4	CURRENT USES OF THE PROPERTY	5
3.5	CURRENT USES OF ADJOINING PROPERTIES	6
4.0	RECORDS REVIEW AND RESULTS OF SEARCH	6
4.1	STANDARD SOURCES USED.....	6
4.2	ADDITIONAL RECORD SOURCES	13
4.3	PHYSICAL SETTING SOURCES	13
4.4	HISTORICAL USES OF THE PROPERTY.....	14
5.0	INFORMATION FROM SITE RECONNAISSANCE.....	17
5.1	OVERALL SITE CONDITION	17
5.2	HISTORICAL USTs	17
5.3	ASTs.....	18
5.4	DRUMS.....	18
5.5	ADDITIONAL ENVIRONMENTAL CONCERNS.....	18
6.0	INTERVIEWS.....	19
7.0	FINDINGS	20
8.0	OPINIONS.....	20
9.0	CONCLUSIONS	20
10.0	CLOSING	20
11.0	REFERENCES.....	20

FIGURES

Figure 1	Site Location Map
Figure 2	Site Map
Figure 3	Clubhouse Detail Map
Figure 4	Maintenance Area Detail Map

APPENDICES

Appendix A	Photographs 1-84
Appendix B	Environmental Data Resources, Inc. (EDR) Reports
Appendix C	Supporting Documentation

1.0 EXECUTIVE SUMMARY

Royal Environmental Services, Inc. (RES) was retained to conduct a Phase I Environmental Site Assessment (ESA) by EnviroMINE Inc. on behalf of New West Investment, Inc. and Cottonwood Cajon ES, LLC (Client) for the subject site, located along the south and southwest side of Willow Glen Drive along the Sweetwater River in El Cajon, California (Figure 1). RES understands that the Client is the existing property owner of the golf club and property and has requested this Phase I as part of a permit process. The subject site consists of 22 parcels combined into the 279-acre Cottonwood Golf Course. The resulting irregularly shaped parcel extends approximately two miles along Willow Glen Drive and the riverbed of the Sweetwater River varying in width from approximately 900 to 1,750 feet. The approximate outline of the subject site is depicted on Figure 2. The subject site is surrounded by a mixture of undeveloped land, large lot single family homes, park land, wildlife refuge and a small area of commercial development as depicted in Figure 2. Adjoining properties are developed land occupied by residential homes to the north and south of the site and undeveloped land east and of west of the site.

Historical records reviewed by RES indicated that the subject site was developed as a golf course since 1962 with immediate adjacent residential properties to the north and south of the subject site being developed beginning in the late 1970s and early 1980's and continuing into the early 2000's. Large areas of undeveloped land set aside as wildlife refuge exist east and west of the subject site. Prior to the development of the main portion of the site as a golf course in 1962 the area was a natural riverbed with minor areas used for plowed field agriculture. No current or historical manufacturing or industrial operations were identified on the adjacent properties or on the subject site.

Regulatory agency database review found records pertaining to the subject site within the ASTM search radius for historical use of underground storage tanks and a hazardous materials business plan for the use of gasoline and diesel fuel containing aboveground storage tanks (ASTs), the storage and disposal of hazardous materials relating to onsite maintenance of landscape equipment and the storage and use of pesticides and herbicides. The site is subject to a number of regulatory program requirements and appears to be in compliance with their requirements.

One unauthorized release from a gasoline UST was reported during annual tightness testing in 1987 and was resolved to the satisfaction of the DEH. The two former USTs were permitted by the County of San Diego Department of Environmental Health (DEH) and were removed under regulatory oversight with no release detected and no further action being required. DEH records from some periodic inspections note some violations for the handling of waste oil, record keeping and employee training at the site. Based upon the DEH records the violations were resolved to the satisfaction of the DEH. Based upon observations made during RES's walk through of the maintenance workshop; some improvement in housekeeping should be instituted. These conditions are deemed "*De Minimis*" conditions.

Regulatory agency database review found records pertaining to businesses within the ASTM search radius for historical use of underground storage tanks and hazardous materials; however none of these businesses adjoin the subject site and are at a sufficient distance that they do not appear to pose a risk to the site. To the extent practicable, RES observed no offsite activities or conditions that would be considered a recognized environmental concern for the subject site. The site is identified within the 100-year flood zone.

2.0 INTRODUCTION

2.1 PURPOSE OF ASSESSMENT

At the request of EnviroMINE Inc. (Client), Royal Environmental Services, Inc. (RES) conducted a Phase I ESA and performed a windshield survey of the vicinity of the site on October 5, 2020 and walk through of the subject site on October 7, 2020 to observe the current conditions of the property. The purpose of this assessment is to identify, to the extent feasible pursuant to the processes prescribed herein, "recognized environmental conditions" (RECs) on or related to the property, as that term is defined in the American Society of Testing Materials (ASTM) Standard E1527-13, Standard Practice for a Phase I ESA.

2.2 SPECIAL TERMS AND CONDITIONS

2.2.1 Guidelines

This report generally conforms to the format outlined by ASTM for the execution of environmental hazard assessments pertaining to commercial projects in addition to the ASTM Standards E-1527-13, Standard Practices for a Phase I ESA ("The ASTM Standard"). This information will be used to evaluate potential environmental liabilities associated with the site. The term "***recognized environmental conditions***" is defined as "*the presence or likely presence of any hazardous substances or petroleum products in, on or at a property (1) due to 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. De minimis conditions are not recognized environmental conditions.*"

It is not sufficient to establish a property feature as a "recognized environmental condition" just because it exists. In order to establish a property feature as a "recognized environmental condition", there "*must be compelling evidence that either 1) the hazardous substance or petroleum product was released from its container or operation onto (or into) the surface or 2) by virtue of the condition of the container or state of the operation that stores or handles such products, there is reasonable concern in the foreseeable future that such materials will be released to the surface of the property.*"

The term "***historical recognized environmental condition***" or HREC is defined as "*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 the regulatory authority, without subjecting the property to any required controls such as property use restrictions, activity and use limitations, industrial or engineering controls.*" This term is addressed to clarify that "historical recognized environmental conditions" describe conditions where past releases were addressed at a property to the level of allowing for unrestricted residential use. In addition, a HREC is an environmental condition which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently. If a past release of any hazardous substances or petroleum products has occurred in connection with the site and has been remediated, with such remediation accepted by the responsible regulatory agency, this condition shall be considered a historical recognized environmental condition and included in the findings section of the Phase I ESA report. If the HREC is determined to be a REC at the time of the Phase I ESA, it shall be identified as such.

The term "***controlled recognized environmental condition***" or CREC is defined as "*a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, (for example as evidenced by a*

no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products to remain in place subject to the implementation of required controls such as property use restrictions, activity and use limitations, institutional controls or engineering controls". The term CREC describes the condition where previous releases at properties that underwent risk-based closures were addressed, but contaminants are allowed to remain in place under certain conditions or restrictions.

The term ***De Minimis*** refers to a condition(s) that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* are not recognized environmental conditions nor controlled recognized environmental conditions.

The ASTM guidance defines “**material threat**” as “...*a physically observable or obvious threat, which is reasonably likely to lead to a release that, in the opinion of the environmental professional, is threatening and might result in impact to public health or the environment.*”

2.3 LIMITATIONS AND EXCEPTIONS

2.3.1 Confidentiality

The following Phase I was prepared for use by the Client as limited by the terms of the proposal and contract between the Client and RES. The report is confidential and no other person or entity may rely on this or any part thereof without the written consent of RES. Such third party consent may require payment of a fee to RES.

2.3.2 Inclusions

A Phase I, by definition, is limited to the above scope. Information sources that RES uses for the assessment are limited to the following:

- Review of standard environmental records, physical setting records, and historical records obtained partially from a commercially available records research company (EDR).
- Visual assessment made during site inspections.
- Interviews with persons with knowledge concerning the property.
- Review of aerial photographs.

2.3.3 Exclusions

The assessment does not include:

- Knowledge or experience of the user or owner about the subject site or surrounding areas which could affect RES conclusions, but which has not been provided to RES.

2.3.4 Nature of Investigation

RES’s investigation has been conducted to the professional standards current at the time of performance. This assessment cannot wholly eliminate uncertainty regarding the potential for such conditions, but is intended to reduce uncertainty regarding the potential for such conditions, and is intended to reduce uncertainty regarding such potential within reasonable cost and time constraints. If the assessment reveals evidence of a REC that has not been addressed, a Phase II ESA may be necessary.

RES makes no other warranty or representation. RES’s conclusions do not constitute an exhaustive study of the subject site or a certification of the absence of any physical defects. The conclusions do represent a

ROYAL ENVIRONMENTAL SERVICES, INC.

diligent and prudent review of available data within established time and cost constraints. RES's conclusions are made on the basis of this data without regard to economic consequences created thereby.

2.3.5 Date of Investigation

RES observed the conditions at the subject site described in this report on October 5 and 7, 2020. Continuing investigation may identify new information not disclosed herein. Changes in the conditions of the subject site and future information generated regarding these matters may result in the need for re-examination.

2.3.6 Reliance on Information

RES conducted this assessment in general accordance with the ASTM Standard 1527-13. Through the course of this assessment, RES has relied on information provided by third party sources including independent environmental database research firms, government agencies, third-party vendors, previous studies by others and present or past owners of the property. RES is not required to verify this information independently unless RES has actual knowledge that certain information is incorrect or unless it is obvious that the information is incorrect based on other information obtained during the assessment.

2.3.7 Report "Shelf Life"

This report is presumed valid for Client use for 180 days following the date prepared by RES. It should not be relied upon beyond this period without first consulting RES or another environmental firm, which subscribes to the ASTM standard regarding the need for an updated investigation.

2.3.8 User's Responsibilities

The Client is responsible for advising RES of certain matters relating to the property which may impact the conclusions of the assessment such as:

- Environmental liens recorded against the subject site;
- User's specialized knowledge or experience material to possible recognized environmental conditions on the subject site;
- User's knowledge that the sale price of the subject site is significantly lower than market value, thus potentially indicating a known defect.

2.3.9 Previous Investigations

EnviroMINE Inc. did not provide a copy of any prior Phase I for the property, however they were aware that RES had performed a Phase I of the site in the past. RES reviewed our report from April 2014 prepared for Premier Golf Properties, LP. The report: Phase I Environmental Site Assessment of The Property Known As: Cottonwood Golf Course (dated April 25, 2014). The 2014 Phase I report included adjacent properties known as the Ivanhoe Ranch that are not included in this current investigation.

As part of our 2014 report RES reviewed a partial (text only) Phase I report prepared by Orswell & Kasman, Inc. dated September 4, 2007. That report stated that no *recognized environmental condition* or *historical recognized environmental conditions* were found and that there was no indication that an offsite potential risk had migrated to the site.

The findings of our 2014 report were:

"Onsite RECs, HRECs, CRECs or Environmental Issues

There does not appear to be any recognized environmental concern based on the information gathered from the investigation or site reconnaissance. Minor housekeeping items in the maintenance facility that are assessed as De Minimis should be addressed.

ROYAL ENVIRONMENTAL SERVICES, INC.

Offsite RECs, HRECs, CRECs or Environmental Issues

There does not appear to be any recognized environmental concern based on the information gathered from the investigation or site reconnaissance.

Historical RECs or Environmental Issues

There does not appear to be any recognized historical environmental concerns for the site based on the information gathered from the investigation or the site reconnaissance. The partial previous environmental investigation stated that ‘...no recognized environmental condition or historical recognized environmental conditions were found and that there was no indication that an offsite potential risk had migrated to the site.’”

3.0 SITE DESCRIPTION

3.1 LOCATION

The subject site is located along the south and southwest side of Willow Glen Drive along the Sweetwater River in a transitional area between suburban and rural area of El Cajon, California (Figure 1).

The Assessor’s Parcel Numbers (APNs) provided by the Client for this site are: 506-021-119, 506-020-52, 518-012-13, 518-012-14, 518-030-05, 518-030-06, 518-030-07, 518-030-08, 518-030-10, 518-030-12, 518-030-13, 518-030-15, 518-030-21, 518-030-22, 519-010-15, 519-010-17, 519-010-20, 519-010-21, 519-010-33, 519-010-34, 519-010-37 and 519-011-03.

3.2 SITE AND VICINITY CHARACTERISTICS

The subject site consists of 22 parcels combined into the approximately 279 acre Cottonwood Golf Course. The resulting irregularly shaped property extends approximately 1.9 miles along Willow Glen Drive and the riverbed of the Sweetwater River varying in width from approximately 1,000 to 1,800 feet. The approximate outline of the subject site is depicted on Figure 2. The Sweetwater River is a seasonal waterway that varies from no flow to infrequent significant flooding depending upon seasonal rain and water releases from the Loveland Reservoir operated by the Sweetwater Authority. The subject site is surrounded by a mixture of undeveloped land, large lot single family homes, park land, wildlife refuge and a small area of commercial development as depicted in Figure 2. Adjoining properties are developed land occupied by residential homes to the north and south of the site and undeveloped land set aside as wildlife refuge east and of west of the site. Photographs of the subject site and adjacent properties are included in Appendix A.

3.3 DESCRIPTION OF STRUCTURES AND OTHER IMPROVEMENTS

The vast majority of the site is developed as golf course. The Cottonwood Golf Course is developed with customer parking lots, a club house with restaurant, bar and kitchen, golf cart parking, wash and charging areas and a landscape equipment maintenance area. A bridge and public road, Steele Canyon Road, crosses the site from north to south. High tension electrical wires cross the site from north to south on metal towers near the middle of the site.

3.4 CURRENT USES OF THE PROPERTY

The subject site is currently used as a golf course identified as Cottonwood Golf Course.

3.5 CURRENT USES OF ADJOINING PROPERTIES

The subject site is located in a transitional area between suburban and rural area of El Cajon, California. Adjacent properties are developed north and south of the site as large lot residential properties. Areas west and east of the site are undeveloped land set aside as wildlife refuges. The following adjacent properties were visually assessed to the extent practicable during the site visit:

North: Willow Glen Drive beyond which are vacant land on the north side of the road on a moderately steep slope rising to a mountain ridge and developed residential properties on the north side of Willow Glen Drive where allowed by terrain. Developed properties consist of large lot residential homes.

West: Undeveloped land set aside as wildlife refuge areas. On the extreme northwest corner of the site are retail commercial properties.

South: Vacant land and developed properties consisting of large lot residential homes, and parkland.

East: Undeveloped land portions of which are set aside as wildlife areas.

4.0 RECORDS REVIEW AND RESULTS OF SEARCH

4.1 STANDARD SOURCES USED

RES conducted a review of the appropriate Federal and State environmental records in general accordance with the ASTM Practice E1527-13 in order to identify sites or facilities with known environmental conditions, which could have an adverse impact on the Property. These data were obtained from a contracted data research firm, Environmental Data Resources (EDR), and are assumed to be complete and accurate. The Environmental Data Resources environmental data are summarized in The Environmental Data Resources Radius Map with GeoCheck reports (the EDR reports) provided in Appendix B.

In addition, RES conducted a review of supplemental Federal, State and local environmental records to enhance and supplement the Federal and State sources required within the ASTM Practice E1527-13. The supplemental environmental data included information obtained from Federal and State databases; county or local environmental records obtained from the county health or environmental department; state environmental records obtained from the state environmental offices; and site-specific data records (if available) obtained from the subject site.

RES reviewed environmental information provided by Environmental Data Resources, Inc. (EDR) to identify recognized environmental conditions on the subject site and surrounding areas. A copy of the EDR reports are provided in Appendix B with an effective date of September 25, 2020, noted on the front page of the report. Due to the size and elongate shape of the subject site, two regulatory search summaries were conducted identifying the Southwest (SW) and Northeast (NE) sides of the subject site. Table 2 incorporates regulatory search summaries of both reports. Detailed information of the search can be found in the appropriate EDR report. The latest government agency updates for individual databases are noted in the last section of the EDR report labeled "Government Records Searched/Data Currency Tracking." The subsection headings below are keyed to the headings of the EDR descriptions.

RES' review of the EDR report dated September 25, 2020, identified the following:

ROYAL ENVIRONMENTAL SERVICES, INC.

Table 2: Regulatory Search Summary

List	Search Radius (miles)	Subject Site	< 1/8 mi.	1/8 - 1/4 mi.	1/4 - 1/2 mi.	1/2 - 1 mi.
NPL	1	None	None	None	None	None
PROPOSED NPL	1	None	None	None	None	None
NPL LIENS	1	None	None	None	None	N/A
Delisted NPL	1	None	None	None	None	None
FEDERAL FACILITY	1/2	None	None	None	None	N/A
SEMS	1/2	None	None	None	None	N/A
CERC-NFRAP	1/2	None	None	None	None	N/A
CORRACTS	1	None	None	None	None	None
RCRA TSDF	1/2	None	None	None	None	N/A
RCRA GEN-Large	1/4	None	None	None	N/A	N/A
RCRA GEN-Small	1/4	None	None	5	N/A	N/A
RCRA GEN-Very Small	1/4	None	None	None	N/A	N/A
RCRA NON-GEN	1/4	1	1	10	N/A	N/A
LUCIS	1/2	None	None	None	None	N/A
US ENG CONTROLS	1/2	None	None	None	None	N/A
US INST CONTROLS	1/2	None	None	None	None	N/A
ERNS	Site	None	N/A	N/A	N/A	N/A
RESPONSE	1	None	None	None	None	None
CA ENVIROSTOR	1	None	None	None	None	1
SWF/LF	1/2	None	None	None	None	N/A
STATE LUST	1/2	None	None	1	1	N/A
San Diego Co. LUST	1/2	1	None	2	1	N/A
INDIAN LUST	1/2	None	None	None	None	N/A
CA SLIC	1/2	1	None	1	1	N/A
FEMA UST	1/4	None	None	None	N/A	N/A
UST	1/4	1	None	1	N/A	N/A
AST	1/4	1	None	2	N/A	N/A
INDIAN UST	1/4	None	None	None	N/A	N/A
VCP/INDIAN VCP	1/2	None	None	None	None	N/A
STATE BROWNFIELDS	1/2	None	None	None	None	N/A
US BROWNFIELDS	1/2	None	None	None	None	N/A
SWAT	1/2	None	None	None	None	N/A
San Diego Co. HMMD	Site	1	N/A	N/A	N/A	N/A
CERS HAZ Waste	1/4	1	1	9	N/A	N/A
TOXIC PITS	1	None	None	None	None	None
SWEEPS UST	1/4	1	None	1	N/A	N/A
HIST UST	1/4	1	None	None	N/A	N/A
CERS TANKS	1/4	1	None	2	N/A	N/A
LIENS	Site	None	N/A	N/A	N/A	N/A
DEED	1/2	None	None	None	None	N/A
FINDS	Site	2	None	N/A	N/A	N/A
UXO	1	None	None	None	None	None

Table 2: Regulatory Search Summary

List	Search Radius (miles)	Subject Site	< 1/8 mi.	1/8 - 1/4 mi.	1/4 - 1/2 mi.	1/2 - 1 mi.
ECHO	Site	1	None	N/A	N/A	N/A
CORTESE	1/2	None	None	1	1	N/A
DRYCLEANERS	1/4	None	None	3	N/A	N/A
Haznet	Site	3	None	N/A	N/A	N/A
MINES	1/4	None	1	None	N/A	N/A
Hist. Cortese	1/2	None	None	1	1	N/A
NPDES	Site	1	None	N/A	N/A	N/A
PEST LIC	Site	2	None	N/A	N/A	N/A
NOTIFY Prop 65	1	None	None	None	None	1
San Diego Co. LOP	Site	1	None	N/A	N/A	N/A
CIWQS	Site	2	None	N/A	N/A	N/A
CERS	Site	1	None	N/A	N/A	N/A
MINES MRDS	Site	1	None	N/A	N/A	N/A
HWTS	Site	5	None	N/A	N/A	N/A
HIST AUTO STATIONS	1/8	None	1	N/A	N/A	N/A
HIST DRYCLEANERS	1/8	None	None	N/A	N/A	N/A
Recovered Gov. Rec.- LUST	Site	1	None	N/A	N/A	N/A

Note: “N/A” indicates not applicable, as the search distance was less than the corresponding distance. For a complete list of abbreviations with greater discussion, see the EDR environmental database report attached in the Appendices.

LIST OF DEFINITIONS OF ABBREVIATIONS AND DATABASES

NPL	National Priorities List (Superfund)
PROPOSED NPL	Sites proposed to be added to the NPL
NPL LIENS	EPA liens against properties that are liable for remedial action expenditures
Delisted NPL	Sites removed from NPL list where no further response is appropriate
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CHMIRS	California Hazardous Material Incident Reporting System
FEDERAL FACILITY	Federal facilities found on CERCLIS where EPA is involved in cleanup
CERC-NFRAP	CERCLIS sites with No Further Remedial Action Planned
CORRACTS	List of hazardous waste handlers with RCRA corrective action activity
RCRA TSDF	RCRA Hazardous Waste Treatment, Storage, and Disposal Facilities
RCRA GEN	RCRA Hazardous Waste Generators
RCRA NonGen / NLR	RCRA Non Generators / No Longer Regulated
US ENG CONTROLS	Listing of sites with engineering controls in place
US INST CONTROLS	Listing of sites with institutional controls in place
LUCIS	Land Use Control Information System from Department of the Navy
ERNS	Emergency Response Notification System for spills
RESPONSE	State- and tribal - equivalent NPL
SLIC	Spills, Leaks Investigations and Clean-Up
SPL	Sites and potential sites within jurisdiction of the Superfund Program Section
SHWS	State list sites subject to investigation under CERCLA programs
SWF/LF	State directory of solid waste landfills and related facilities
LUST/INDIAN LUST	State Leaking Underground Storage Tank lists for State and Tribal lands
UST/INDIAN UST	State registered Underground Storage Tank lists for State and Tribal lands
FEMA UST	Listing of FEMA-owned Underground Storage Tanks

RGA LUST	Recovered Government Archive Leaking Underground Storage Tank database
AST	State above-ground Storage Tanks list
VCP/INDIAN VCP	State/Tribal database of sites included in a State Voluntary Cleanup Program
BROWNFIELDS	State brownfields tracking database
CERS TANKS	California Environmental Reporting System (CERS) Tanks
FINDS	General listing of sites found on various databases that may indicate environmental issues exist
UXO	Unexploded Ordnance Sites
ECHO	Enforcement & Compliance History Information for regulated facilities nationwide
MANIFEST	Database of Hazardous Waste Manifest Reporting
HWTS	Hazardous Waste Tracking System, DTSC data for hazardous waste ID and manifests
EDR HISTORICAL AUTO STATIONS	Proprietary listing of historical auto stations
DRYCLEANERS	State listing of registered drycleaner facilities
NPDES	Nation Pollution Discharge Elimination System Permits including stormwater
CIWQS	California Integrated Water Quality System manages permits, orders, inspections, violations and enforcement
PEST LIC	Pesticide Regulation Licenses Listing issued by the Department of Pesticide Regulation
MINES MRDS	Mineral Resources Data System
MINES	Mine Site Location Listing from the Office of Mine Reclamation
AQUIFER	State list of facilities with aquifer protection permits for discharge
COUNTY PERMIT	Local County Hazardous Material Permit

4.1.1 SUBJECT SITE DATABASE LISTING

Based on the listings identified in the EDR search database, the subject site address was identified on twenty one of the databases searched and listed above. Many of these lists are duplicates such as Federal, State and County lists for the same former USTs and ASTs that appear on both obsolete lists and newer agency developed lists. In addition inclusion on many lists is the result of complying with existing environmental regulations particularly for permitting and waste management. Finally several business entities such as Western Golf Resources, Rancho San Diego Golf Course, 1X Rancho San Diego, NITTA Enterprise Inc., as well as Cottonwood Golf Club has used the 3121 Willow Glen Drive address. Details regarding the findings are presented below.

3121 Willow Glen Drive

The subject site was listed in the EDR search database listings UST, SWEEPS, RGA LUST, San Diego Co. HMMD and San Diego County SAM, HIST UST, CPS-SLIC and due to former USTs at the site. The SLIC, UST and San Diego County SAM listing is associated with Case Number: H20208-001 regarding a failed integrity test from a historical UST. A no further action case closed status for this release was issued on August 8, 1987.

The Historical UST and AST listings include several USTs that were removed from the subject site. The facility is listed under SWEEPS, RGA LUST and HIST UST due to the one 5,000 gallon single walled UST containing leaded gasoline associated with Permit# 120208 that was removed on April 13, 1993. The remaining 5,000 gallon double walled UST containing unleaded gasoline with Permit #202521 was removed in June 4, 2004. Two ASTs one 1,000 gallon for storing diesel fuel and one 500 gallon for storing gasoline currently exist at the subject site.

The subject site was listed on CERS Tanks and AST, FINDS, ECHO, CERS HAZ WASTE and HAZNET. These listings are the result of current ASTs and hazardous materials stored onsite as well as past disposal of hazardous waste under required manifest programs. The subject site was also listed under the RCRA NonGen list as the site at one point was not disposing of RCRA wastes. The subject site was listed on HAZNET and HWTS, due to a cleanup event in 1983 resulting in 0.45 tons of soil being disposed of at a landfill as well as the routine ongoing disposal of used/mixed oil, used batteries, used oil filters and an aqueous solution with

total organic residues. A license under the PEST LIC program is listed for Javier Ruiz at the subject site address and was issued or renewed on January 1 2020 and expires in December 31, 2021.

The subject site was listed under the NPDES construction permit as Premier Golf Properties at 3121 Willow Glen Drive from 03/10/2016 until terminated 10/04/2019. The activity listed was to disturb 300 acres to regrade the golf course. This permit was also listed under the CIWQS for reporting water compliance during construction.

The subject site was also listed as Rancho San Diego Golf Course under the MINES listing in 1999, with an operator named J. Cloud Inc. with an activity description of streambed or gravel bar skimming and pitting. The site appears as a past producer on the MINES Mineral Resource Data System (MRDS) listing as the Cottonwood Golf Course Pit as a surface mine for sand and gravel under the owner Cottonwood Golf Course Partnership in 1990.

The subject site is listed under San Diego Co. HMMD, now known as the County of San Diego Department of Environmental Health (DEH) due to the facility's hazardous materials onsite including diesel, gasoline, waste oil, oil filters, batteries, welding tanks (acetylene and oxygen under pressure) and ammonium sulfate. Past inspections have generally found several violations noted by the DEH overtime associated with the subject site including improper hazardous waste storage and handling, unauthorized disposal of hazardous waste, inadequate employee training records, no secondary containment and failure for test repairs, improper labeling, failure to amend the hazardous material business plan and failure to document inspections. Based upon DEH records these conditions were corrected and the site was returned to a compliant status. The three most recent inspections by the DEH were performed in 2015, 2017 and 2019. Below is a list of the violations found in each inspection based upon the EDR database. In each case the DEH indicated the facility returned to compliance. None of the waste handling violations in the last three inspections are listed as having resulted in a violation for a release of hazardous materials to the ground or improper disposal of wastes onsite. Several of the permit submission violations are due to the changes in ownership during the period as well as the new State reporting system. RES requested the DEH records for the facility they are included in Appendix C.

2015

- Failure to complete and electronically submit the Business Activities Page and/or Business Owner Operator Identification Page through the California Environmental Reporting System (CERS).
- Failure to prepare and implement a Spill Prevention Control and Countermeasure (SPCC) Plan.

2017 (Two inspections)

- Failure to send hazardous waste offsite for treatment, storage, or disposal within 180 days.
- Failed to repackage damaged/deteriorated hazardous material container within 96 hours.
- Failure to meet the following container management requirements: (a) container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. (b) A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.
- Failure to properly manage used oil and/or fuel filters in accordance with requirements.
- Failure to prepare and implement a Spill Prevention Control and Countermeasure (SPCC) Plan.
- Failure to accumulate universal waste for one year or less and to demonstrate the length of time that the universal waste has been accumulated from the date it became a waste or was received.
- Failure to properly label hazardous waste accumulation containers.
- Unified Program Facility permit not obtained for hazardous materials.

ROYAL ENVIRONMENTAL SERVICES, INC.

- Failure to ensure the following before allowing drainage of uncontaminated rainwater from diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond bypassing the facility treatment system.
- Failure to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.
- Unified Program Facility Permit not obtained &/or maintained for the generation of hazardous waste.
- Unified Program Facility permit not obtained for hazardous materials.
- Failure to complete and electronically submit hazardous material inventory information for all reportable hazardous materials on site at or above reportable quantities.

2019

- Failure to annually review and electronically certify that the business plan is complete and accurate on or before the annual due date.
- Failure to maintain a complete copy of the SPCC Plan at the facility.
- Failure to provide initial and annual training to all employees in safety procedures in the event of a release or threatened release of a hazardous material or failure to document and maintain training records for a minimum of three years.
- Failure to comply with one or more of the following requirements (relating to the fuel ASTs): 1. Have record of inspections and integrity tests signed by the appropriate supervisor or inspector. 2. Keep written procedures and records of inspections and integrity tests for at least three years. 3. Keep comparison records.

4.1.2 LISTINGS FOR NEARBY SITES WITH POTENTIAL TO IMPACT THE PROPERTY

Databases listing off-site properties were analyzed to determine whether they were likely to have an adverse impact on the site. The automated analysis included consideration of factors including: the nature and extent of a given release, the distance of the reported release from the site, the stratigraphy of soils, the expected soil permeability, and the topographic position of a reported release site with respect to known or expected local and/or regional groundwater flow direction. Based on the automated evaluation criteria, the following facilities were listed on the database, and are considered to have the potential to be a source of impact to the site, until reviewed during a site visit.

Source: Radius Map (Northeast side)

Sovereign Health of California – 2815 Steel Canyon Road

The facility is located adjacent to the mid portion of the site on the southeast side of Steel Canyon Road and is listed as a RCRA-SQG with FINDS and ECHO listings. Based upon the small quantity generators (SQGs) designation the facility generates between 100 kg and 1,000 kg of hazardous waste per month including ignitable hazardous wastes and spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol and nicotine, & salts (or) pyridine, 3-(1-methyl-2-pyrrolidinyl)-(s)-, & salts. Based upon FINDS data the site has no recorded violations relating to waste handling. The NAICS code for the facility is for residential mental health and substance abuse facilities. Based on available records and the use of the site, the site does not appear to present a REC to the subject site.

Doug Howarth – 2478 Wind River Road

This address is located approximately 940 feet north of the site and was listed on the RCRA NonGen / NLR database. There are no associated violations or releases from the property according to EDR and GeoTracker database search. The location of this address was confirmed to be a current residential address in a residential development and is most likely a business mailing address. Based on the location and available regulatory records reviewed to date, the site does not appear to present a REC to the subject site.

Source: Radius Map (Southwest side)

Best Way Cleaners – 2441 Jamacha Road Suite 103

This facility is located approximately 660 feet northwest of the site and was listed as an existing drycleaners and historical drycleaner and HAZNET on database listings. The HAZNET listing identifies that the property disposes of liquids with halogenated organic compounds. The property was listed as a historical drycleaner during the years 2006, 2010, 2011 and 2012. There are no associated releases from the property according to EDR and the site is not listed on the GeoTracker website. Based on its available regulatory records reviewed to date, the site does not appear to present a REC, HREC or CREC to the subject site.

SHELL/CNG Inc. – 2411 Jamacha Road

The facility is located approximately 820 feet northwest of the site. EDR Search database listings identified the property as a San Diego County SAM and HMMD, EDR Historical Auto Station, RCRA-SQG, LUST, HAZNET, HWTS, UST, SWEEPS UST and Cortese. The property is identified as a SQG and HAZNET of hazardous waste oil containing benzene. There are no associated violations found. The Tesoro Station at the same address is listed on the same databases with the exception of the RCRA NonGen/NLR listing.

There are three active 12,000 gallon USTs at the property containing unleaded gasoline. The property was a LUST cleanup according to SD County SAM with Case Number: H26496-001. In 2003, a petroleum hydrocarbon gasoline release was detected during product piping removal. Eight groundwater monitoring wells were installed at the property, monitored and sampled between June 2004 and December 2010. Distribution of soil contamination was limited to the shallow subsurface onsite at 3 to 5 feet below ground surface (bgs). Total residual hydrocarbon mass above 100 mg/kg TPHg subsurface is estimated to be 927 cubic yards. Liquid phase hydrocarbons have not been present in the monitoring of groundwater sampling since 2004. The dissolved phase groundwater plume has been adequately assessed and a Corrective Action Plan (CAP) was submitted in March 2011 concluding that the remediation of residual hydrocarbon concentrations in soil and groundwater are expected to achieve the targeted cleanup goals through natural attenuation process. A vapor risk assessment at the property concluded no risk of vapor intrusion to station workers of indoor air. The site was identified as posing no significant risk to human health and the environment, and a no further action was issued by the SD County in December 16, 2011. Based on the regulatory status of the past release, and distance to the subject site, the site does not appear to present a REC HREC or CREC to the subject site.

Advantage Cleaners- 2522 Jamacha Road

This facility is located approximately 1,420 feet west-northwest from the site. The facility is also listed as San Diego County HMMD and San Diego County SAM due to a PCE and TCE release to subsurface soil due to dry cleaning operations. Approximately 15 cubic yards of PCE/TCE contaminated soil was excavated down to a depth of 3.5 feet below ground surface (bgs). Confirmation soil and vapor samples indicated that the cancer risk from the level of residual PCE vapors were less than 1 in 1,000,000. Analysis of groundwater sample collected in a down-gradient location indicated no evidence of PCE impacted groundwater. The excavated hole was backfilled with concrete slurry. A steel liquid containment pan was placed beneath the dry cleaning unit along with the application of a chemical resistant coating on the floor to minimize future

subsurface releases. A case closed status was issued in November 20, 1998 by the County of San Diego, SAM. Based on the available records reviewed, the site does not appear to present a REC HREC or CREC to the subject site.

4.2 ADDITIONAL RECORD SOURCES

4.2.1 Water Supply, Sewage Disposal, Gas and Electric

According to RES research, water services are provided by the Otay Water District, electrical services are provided by San Diego Gas & Electric. The clubhouse kitchen uses propane from one 500- gallon AST for cooking and heating. Sewer discharge is to septic systems. The site has separate septic systems for the kitchen, the clubhouse, and for several restroom facilities provided on the golf course.

4.3 PHYSICAL SETTING SOURCES

4.3.1 USGS Topographic Maps

According to United States Geographical Survey (USGS), El Cajon Quadrangle 7.5 minute series topographical map dated 2012 and the Jamul Mountains Quadrangle 7.5 minute series topographical map dated 2012; the site is located at an elevation of approximately 330 feet to 370 feet above mean sea level (msl). Topography in the immediate vicinity of the subject site is directed to the Sweetwater River then to the west. Elevations within the immediate vicinity of the site range from 320 to 600 feet above mean sea level. The site is surrounded by gently rolling hills and swales with some areas of steep slopes. Within the site are a number of maintained ponds created by excavation and filled from pumping onsite groundwater. Along the southern property boundary are several low areas that appear to form ponds depending on the season and local hydrologic conditions such as seasonal rain, depth to groundwater and local irrigation run off. East and west of the site are undeveloped land set aside as wildlife refuge. Otherwise, no additional streams, rivers, marshes or other environmental receptors are depicted in the vicinity of the subject site on the topographic map.

4.3.2 Basin Water Quality Control Plan

The San Diego Regional Water Quality Control Board Basin Plan (Basin Plan) with amendments effective on or before May 17, 2016), identifies the subject site as situated within the Jamacha Hydrologic Subarea (HSA), of the Middle Sweetwater Hydrologic Area. The Basin Plan designates existing beneficial uses of groundwater in the Middle Sweetwater Hydrologic Area for municipal supply (MUN), agricultural supply (AGR) and industrial supply (IND). Surface waters of this area are designated with existing beneficial uses for MUN, AGR, IND, process water, recreational uses 1 and 2, warm freshwater habitat, and wildlife habitat.

4.3.3 Geology and Soil Conditions

The USGS 2010 geologic map of California indicates that the subject site and surrounding area are located in the foothills of the Peninsular Range area and are underlain by the Mesozoic plutonic rocks (granitic) with Quaternary Age Alluvium.

Soil information provided in the EDR report indicates that soils below the subject site consists of Riverwash gravelly coarse sand, Tujunga sand and Vista coarse sandy loam. These soils have moderate to high infiltration rates, soils are moderately deep and deep, well drained to excessively drained sands and gravels.

4.3.4 Flood Plain Setting and National Wetland Inventory Maps

A flood plain is the area adjacent a river, stream, drain, or lake that is utilized to convey floodwaters during high water events. The flood plain primarily is divided into two categories: (1) the 100-year flood zone and, (2) the 500-year flood zone. The 100-year flood zone is defined as having a one percent or higher chance of floodwaters reaching that level of floodwater conveyance. Many cities participate in the National Flood

Insurance Program and usually have Flood Insurance Rate Maps developed by the Federal Emergency Management Association (FEMA) or an equivalent map. The FEMA maps typically have designated three primary zones of flooding potential. These zones are identified as A, B, and C. An area identified as a “Zone A” is located in the 100-year flood zone, a “Zone B” area is located in the 500-year flood zone, a “Zone C” is located in an area of minimal flooding potential, and a “Zone X” is located in an area determined to be outside the 500-year flood zone. Certain maps depict sub designations within Zone A such as the area of the subject site. A panel from the FEMA Flood Map Service Center of the area of the site near Steel Canyon Road is provided in Appendix B as an example. Maps of the remaining areas of the site can be accessed at the FEMA flood Map Service Center: Search by address web page (<https://msc.fema.gov/portal/search?>).

Based on the review of the FEMA Detail Map, the site lies within *the 100-year flood zone*. Portions of the Property are further identified as:

- *Being within a Special Flood Hazard Area, with zones along the riverbed identified as Regulatory Floodway Zone AE and adjoining areas in Zone AE with base flood elevation or depth.*

Based on the review of the EDR database listing Overview Map and the EDR Detail Map and the National Wetland Inventory webpage, portions of the Property are:

- *Located within the limits of a National Wetlands Inventory wetland identifying both natural and excavated wetlands.*

4.4 HISTORICAL USES OF THE PROPERTY

Aerial photographs and topographic maps depicting the subject site were obtained from EDR to evaluate historical usage of the subject site. City directories were also obtained from EDR for additional historical information on the subject site. RES submitted a request on September 1, 2020 to review hazardous material records and previous site investigations of the subject site from the County of San Diego, Department of Environmental Health. The department had records pertaining to the site are included in Appendix C. No records were found listed under the assessor parcel numbers as indicated by the “no record found” reply to the request for records. A copy of the response is included in Appendix C supporting documentation.

4.4.1 Aerial Photograph Review

RES obtained aerial photographs depicting the subject site and surrounding vicinity for the years 1949, 1953, 1964, 1966, 1970, 1979, 1985, 1989, 1994, 2005, 2009, 2012 and 2016 from EDR. In addition a 1974 photograph of the area held by RES is included in our descriptions. Copies of the photographs are included in Appendix C.

1949-53 Willow Glen Road is present in its current location. The majority of the subject site, adjacent properties, and the general area appear to be undeveloped land or ranch land covered with native plants and trees. The surrounding area has some properties with plowed fields and trees planted in an orchard pattern. One area of plowed fields is present where the modern Steel Canyon Road and bridge crosses the property to Willow Glen Road. A residence that still remains at 3629 Willow Glen Road is present.

1964 The eastern side of the subject site is developed as a golf course with what appears to be a single fairway extending onto the western portion of the site beyond Steel Canyon Road. The remaining western area is undeveloped and covered with native plants. In the southeastern corner of the western

area near Steel Canyon Road an area of excavation approximately 700 in length by 150 in width is visible with a narrower strip of water within the excavation. Adjacent properties and the general area appears to remain undeveloped land or ranch land covered with native plants. The current clubhouse and parking area of the site are developed and there are two buildings present in the current location of the maintenance area. The area of plowed fields where the modern Steele Canyon Road and bridge crosses the property to Willow Glen Road appear more extensive and there are several large buildings associated with the plowed fields.

- 1966 The site and surrounding areas are similar to the 1964 photograph except that the facility currently known as Sovereign Health of California at 2815 Steel Canyon Road is being developed with most of the current buildings. In addition the excavation in the southeastern corner of the western area near Steel Canyon Road appears wider and is more filled with water and there appears to be additional fairway area. On the south east side of Steel Canyon Road an area appears to be undergoing excavation.
- 1970 The western side of the subject site appears to have been fully developed as a golf course with the greens extending to the current western extent of the property. The area of excavation on the south east side of Steel Canyon Road appears to have become inactive with some noticeable plant growth.
- 1974 The site and surrounding areas are similar to the 1970 photograph. Adjacent properties and the general area appear to be filling in with some new residences. Extensive grading is occurring north of Willow Glen Road on the north side of the adjacent hills. However a large part of the graded area appears to be filled with water. The general area remains largely undeveloped land or ranch land covered with native plants. The area of excavation on the south east side of Steel Canyon Road is inactive with a noticeable plant cover.
- 1979 The site and surrounding areas are similar to the 1977 photograph. The river channel across the site appears more distinct and there are bridges built across the channel throughout the facility. An obvious pond is present south east side of Steel Canyon Road. Grading north of Willow Glen Road appears to have halted with no obvious further development since 1974 and a large part appears to still be filled with water. It is possible this was intended to be a water reservoir.
- 1985 The area surrounding the property is undergoing significant development. North of Willow Glen Road several large areas have been developed or are being graded for residential development and the area of ponded water is gone. Adjacent properties on the southern border of the site both west and east of Steele Canyon Road are being graded for residential development. The commercial area west of the site is beginning development. The maintenance area appears to consist of three buildings in its current configuration. A new pond along the riverbed is apparent along the south side of the western area.
- 1989 The site appears similar to the conditions from 1985. Residential development north of Willow Glen Road appears largely completed to its current extent. The commercial area and shopping centers west of the site are still undergoing development.
- 1994 The site appears similar to the conditions in 1989. However the drainage through the course appears have experienced erosion that has removed the grass and looks like a sediment lined stream bed. Large lot residential development continues to be filled in south of the site. The commercial area west of the site is largely developed.

- 2005 The site appears similar to the conditions in 1989 and 1994. The residential developments south of the site appear completed. The commercial area west of the site is completely developed.
- 2009-16 The site appears similar to the conditions in photographs from 2005. A small area of commercial development on the south side of Willow Glen Drive along the western property boundary has been completed. A new pond is present west of clubhouse beginning in 2009.

4.4.2 Topographic Map Review

RES obtained topographic maps which include Quadrangles from El Cajon, Cuyamaca and Jamul Mountains, depicting the subject site and surrounding vicinity for the years 1893, 1901, 1903, 1904, 1939, 1948, 1955, 1967, 1971, 1975, 1994, 1996, 1975, 1994 and 1996 from EDR. The subject site was depicted as being undeveloped from 1893 to 1955 with the Sweetwater River on the site. Sycuan Indian Reservation is present further east of the subject site in 1903. A water tank is depicted east of the subject site in 1948. Willow Glen Drive is depicted north of the subject site in 1948. Steele Canyon Road and adjacent residential properties to the south of the subject site are depicted in 1971.

4.4.3 City Directory Review

EDR provided a summary of addresses of potential concern including gas stations, cleaners, automotive shops and other address occupants of potential environmental concern located on the subject street within the vicinity of the subject property. No indications of property use of potential environmental concern were noted. RES obtained a city directory search from EDR which included the years 1955 to 2017. The address of the subject site was apparently not found in directories until 1971.

The subject site is listed as Cottonwood Country Club at 3121 Willow Glen Drive during the period 1971 to 2017. Adjoining property addresses were also reviewed particularly 2712 through 3773 Willow Glen Drive as these addresses are for the properties located east and west of the subject site at the present time.

4.4.4 Regulatory Agency Record Review

RES submitted a request to review hazardous material records and any previous site investigations of the subject site from the County of San Diego, Department of Environmental Health on September 1, 2020. The department records were available for the on unauthorized release from 1987, the two UST removals and inspection records for the site from 1987 to the present. Details of these records relating to USTs and ASTs are provided in those sections below. Compliance inspection record information is detailed below. Copies of these records including UST records are included in Appendix C. A brief summary of the records indicate inspections performed at the site found permits and a hazardous materials business plan in order and up to date, waste disposal records available and up to date. Violations were noted relating to the storage of waste oil in incorrect or unlabeled containers, storing waste oil beyond allowable holding times or not documenting storage duration, not managing used oil filters (improper containers), spillage of used oil to the ground, not documenting employee training and not documenting weekly inspections of hazardous materials storage areas. Based upon regulatory records the facility performed corrective action and was considered to have returned to compliance. No comments were made concerning the storage of herbicides or fungicides.

The three most recent inspections by the DEH were performed in 2015, 2017 and 2019. A list of the violations found in each inspection based upon the EDR database was presented in section 4.1.1. In each case the DEH indicated the facility returned to compliance. None of the waste handling violations are listed as having resulted in a violation for a release of hazardous materials to the ground or improper disposal of waste to the site.

RES reviewed the State of California GeoTracker website on October 7, 2020 where all current open and closed environmental cleanup cases for leaking USTs, military, Department Toxic Substances Control (DTSC), land disposal and “other” cleanup sites with State or County regulatory oversight as well as currently permitted UST are required to post environmental reports and regulatory agency correspondence. There were no identified sites within a 1,000 feet radius from the site that would indicate a recognized environmental concern other than those previously identified and evaluated in the data base discussion. A copy of the GeoTracker map reviewed for this report is provided in Appendix C.

5.0 INFORMATION FROM SITE RECONNAISSANCE

5.1 OVERALL SITE CONDITION

RES conducted a reconnaissance of the subject site on October 5 and 7, 2020.

The facility is almost entirely golf greens, landscape areas, ponds or water ways or vacant land. Relatively small areas of the site are paved or developed with buildings. The facility parking lot was clean and free of trash or staining. The clubhouse, golf cart pick up area and the outdoor patio areas were neat and clean. In the active portion of the facility the landscaped areas greens appear to be well maintained despite a recent heat wave. The western portion of the site west of the Steel Canyon Bridge has been deactivated and is returning to a natural state without irrigation. Many ponds appeared to be in a natural and healthy state. Several ponds appeared to have been drained as part of downsizing of the active area of the course. Details of the clubhouse area are noted on Figure 3.

West and east of the site are undeveloped land set aside as wildlife refuge areas. Due to the size of the site detailed photographs of the site are presented in Appendix A in place of an extended site description.

5.2 HISTORICAL USTs

Based on the site reconnaissance and available information obtained, there appears to have been evidence of two USTs having been present at the subject site. Each UST has been removed under regulatory agency oversight and no further action was required by the regulatory agency. The approximate former locations of these USTs as noted in DEH documents are noted on Figure 4.

Tank number one was of unknown age. Its piping failed an integrity test in 1987, the piping was repaired and retested and a no further action letter was issued. When this UST was removed in 1993, no indication of impact from fuel (gasoline) were noted by the regulatory inspector and laboratory analysis of two soil samples collected from beneath the UST contained no detectable concentrations of total petroleum hydrocarbons (TPH) at the laboratory detection limit.

Tank number two was installed in 1993 was permitted and maintained in compliance until removed in 2009 under permit. At the time of removal there was no indication of impact from fuel (gasoline) noted by the regulatory inspector and laboratory analysis of two soil samples collected from beneath the UST contained no detectable concentrations of TPH. One sample was further analyzed for benzene, toluene, ethyl benzene xylene (BTEX) and the fuel oxygenates methyl tertiary butyl ether (MTBE), di-isopropyl ether (DIPE), ethyl tart-butyl ether (ETBE), tart-amyl methyl ether (TAME), tert-butanol (TBA) and ethanol by EPA Method 8260B, none were detected at the laboratory detection limit.

5.3 ASTs

Based on the site reconnaissance and the available information, there appear to be historical and current ASTs at the subject site. The two ASTs at the time of our site visit were a 1,000 gallon steel single walled diesel fuel tank and a 500 gallon steel double walled gasoline tank. The ASTs are permitted, have secondary containment and appear to be in compliance with applicable regulations.

5.4 DRUMS

RES observed no evidence of abandoned drums at the subject property. Several drums were present in the maintenance area of the site. Two were currently in use for fresh oil, with two in inventory, one waste oil and a third to store drained used oil filters all placed on secondary containment pallets. There was no indication that the use of these drums for the materials contained has impacted the subject site.

5.5 ADDITIONAL ENVIRONMENTAL CONCERNS

5.5.1 Drains and Drainage

The majority of the subject site lies within a riverbed that receives drainage from upstream of the site and surrounding properties and roads. Drainage from upstream of the site consists largely of undeveloped and agricultural use properties that according to the onsite maintenance superintendent rarely produces surface flow, even during winter rain events, in the riverbed on the site. The residential developed properties and roadways north of the site and along the southeast of the site drain to the site through municipal storm drain systems. Observations made of streets and storm drain inlets from the windshield survey of the surrounding properties did not find evidence of likely stormwater pollution due to the large lot residential development. The adjacent Willow Glen Drive drains onto the site and could potentially result in stormwater pollution to the site in the event of a significant heavy vehicle accident under specific conditions such as during a rain event. Such a spill incident would have a defined responsible party for potential impact to the site if it should occur.

The facility has one wash area for cleaning electric golf carts near the club house and the golf cart charging area. This area is paved and drains to a grate cover basin. Collected water is pumped to a nearby pond and then used for irrigation. Observation of this wash area found no evidence of oil sheen or staining.

5.5.2 Housekeeping

The facility is almost entirely golf greens, landscape areas, ponds or water ways, or vacant land. Relatively small areas of the site are paved or developed with buildings. The facility parking lot was clean and free of trash or staining. The clubhouse, golf cart pick up area and the outdoor patio areas were neat and clean. In the active portion of the facility the landscaped areas greens appear to be well maintained despite a recent heat wave. The western portion of the site west of the Steel Canyon Bridge has been deactivated and is returning to a natural state without irrigation. Many ponds appeared to be in a natural and healthy state. Several ponds appeared to have dried out as part of downsizing of the active area of the course. Detailed photographs of the site are presented in Appendix A.

RES observed minor housekeeping issues at the golf cart charging area and maintenance area. In the maintenance area this is largely due to the retention of equipment for future repair and for parts salvage. Areas of the facility relating to the storage of fuel, fresh oil, and waste oil were found have containers in good condition and to have secondary containment. Based upon regulatory inspection records and information from the maintenance superintendent Gerry Ruiz; relatively small quantities of waste oil, used oil filters and batteries are generated at the facility. Currently the facility disposes of approximately one drum of waste oil

and 30 filters per year and six batteries per month. Batteries are exchanged regularly by a vendor. Generally, it is more economical to have waste hauler pick up larger quantities per visit making longer accumulation times more practical up to the legal maximum of 9 months. Proper labeling and record keeping can ensure compliance with storage times. Regulators are generally more tolerant of long or excessive storage periods if containers and secondary containment are maintained in a neat and orderly fashion. Waste batteries should be stored indoors in secondary containment.

The maintenance superintendent Gerry Ruiz was helpful and knowledgeable about the regulatory requirements affecting the facility. The chemical storage room was neat and organized with an eyewash station immediately outside the room. Required Material Safety Data Sheets (MSDS) were held in the groundskeeper office.

According to Mr. Ruiz the following chemicals or equivalent are in use at the site and have been for most of his tenure at the site: 3336-WP-Fungicide for turf, Aquamaster-Herbicide for aquatic weeds, FORE-Fungicide for turf, Daconil 2787-Fungicide for turf, RODEO-Herbicide for aquatic weeds and brush, Manage-Herbicide for turf, and Roundup Pro-Herbicide for turf. Mr. Ruiz indicated that due to the expense and required frequency of use only small quantities, approximately one month's supply is kept on hand and only when required based upon conditions and seasonal needs. He also indicated that pesticides are rarely used and only a small inventory was present at this time. These products are applied only as needed as they are expensive.

Following our site walk, evidence of compliance with regulatory permits and inspection records were available from Mr. Rick Adams, Corporate Project Manager and Compliance Officer. Mr. Adams provided printouts from the California Environmental Reporting System (CERS) website for Business Activity, Business Plan and compliance with spill prevention control and countermeasure plan (SPCC). Mr. Adams also indicated that several homeless encampment clean up events have been performed in 2020 by a qualified contractor.

5.5.3 Local Registered Environmental Sites

A nearby Shell station is identified as a HREC and is located approximately 820 northwest from the site was identified as a former LUST cleanup site according to SD County SAM with Case Number: H26496-001. This was due to a petroleum hydrocarbon release detected in the soil during product piping removal in 2003. Groundwater monitoring wells were monitored and sampled. Liquid phase hydrocarbons were not present in the monitoring of groundwater sampling since 2004. Residual total petroleum hydrocarbon remains onsite and expected to achieve the targeted cleanup goals through natural attenuation process. A no further action letter was issued by the SD county SAM in December 16, 2011.

Advantage Cleaners located approximately 1,420 feet west-northwest from the site was identified due to the past release of PCE and TCE to subsurface soil due to dry cleaning operations. Soil and groundwater medial were affected during the release. Groundwater samples were collected and analyzed from a down-gradient location to the property and indicated no evidence of PCE in groundwater. Contaminated soil was excavated and backfilled with a concrete slurry. A case closed status was issued in November 20, 1998 by the County of San Diego SAM.

6.0 INTERVIEWS

RES conducted onsite interview with the maintenance superintendent Mr. Gerry Ruiz. He provided access to the site, provided information about the operations and maintenance of the facility and was helpful and knowledgeable about the regulatory requirements affecting the facility. He has worked at the facility since

1978. His comments are incorporated throughout the report. Mr. Rick Adams, Corporate Project Manager and Compliance Officer completed the Phase I ESA questionnaire and discussed elements of the environmental program at the site. His comments are incorporated throughout the report and a copy of the completed questionnaire is provided in Appendix C.

7.0 FINDINGS

Onsite RECs, HRECs, CRECs or Environmental Issues

- There does not appear to be any recognized environmental concern based on the information gathered from the investigation or site reconnaissance. Minor housekeeping items in the maintenance facility that are assessed as *De Minimis* should be addressed.

Offsite RECs, HRECs, CRECs or Environmental Issues

- There does not appear to be any recognized environmental concern based on the information gathered from the investigation or site reconnaissance.

Historical RECs or Environmental Issues

- There does not appear to be any recognized historical environmental concerns for the site based on the information gathered from the investigation or the site reconnaissance.

9.0 CONCLUSIONS

RES has performed a Phase I ESA of the subject site described herein in conformance with the scope and limitations of the ASTM Practice E1527-13 at the subject site. Any exceptions to or deletions from this practice are described in Sections 2.3.2 and 2.3.3 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property. Based on RES's site reconnaissance, historical review, and regulatory agency database review, no additional investigation is recommended at this time.

10.0 CLOSING

RES appreciates the opportunity to have assisted, EnviroMINE Inc., New West Investment, Inc. and Cottonwood Cajon ES, LLC with this Phase I ESA. Should you have any questions pertaining to this report, or require additional environmental services, please do not hesitate to contact RES at (619) 985-6363.

Prepared By:



John W. Royal PG 6757
Principal Geologist

11.0 REFERENCES

- *EDR Aerial Photo Decade Package*, dated September 28, 2020
- *GEOTRACKER*, <http://www.geotracker.swrcb.ca.gov>, Accessed October 7, 2020.

ROYAL ENVIRONMENTAL SERVICES, INC.

- *EDR Historical Topographic Map Report*, dated September 24, 2020
- *EDR City Directory Abstract*, dated September 29, 2020.
- *EDR Radius Map, Report with GeoCheck*, dated September 25, 2020
- *EDR Certified Sanborn Map Report*, dated September 24, 2020.
- Google Earth online maps, aerial photograph, 2018
- County of San Diego Department of Environmental Health Inspection Records.

FIGURES 1, 2, 3 and 4

Site

Site Location Map
Cottonwood Golf Course
3121 Willow Glen Drive
El Cajon, CA

Checked By:
JWR

Date: 10/14/2020

EnviroMINE Inc.
3511 Camino Del Rio South, Suite 403
San Diego, CA 92108

Figure No:

1

Drawn By:
ZR

Site

Clubhouse

Maintenance Area

Willow Glen Drive

Steel Canyon Drive

Site Map

Cottonwood Golf Course
3121 Willow Glen Drive
El Cajon, CA

EnviroMINE Inc.

3511 Camino Del Rio South, Suite 403
San Diego, CA 92108

Checked By:
JWR

Figure No:

2

Drawn By:
ZR

Date: 10/14/2020

Parking Lot

Clubhouse Septic Tank and Leach Field

Clubhouse

Golf Cart Pickup Areas

Kitchen Septic Tank and Leach Field

Former Outdoor Pavilion Area

Golf Cart Wash Area

Golf Cart Charging Area

Clubhouse Detail Map

Cottonwood Golf Course
3121 Willow Glen Drive
El Cajon, CA

EnviromINE Inc.

3511 Camino Del Rio South, Suite 403
San Diego, CA 92108

Checked By:
JWR

Figure No:

3

Drawn By:
ZR

Date: 10/14/2020

Green Waste
Groundskeeper Office
1,000 Gallon Diesel AST
500 Gallon Gasoline AST
Tire Storage Area
Trash dumpsters and Cardboard Recycling Area
Workshop Buildings
Former USTS (2) Locations (reported)
Waste Oil Storage Area
Fresh Oil Storage Area
Equipment Storage
Locked Pesticide Storage Room and Eye Wash Station

Maintenance Area Detail Map

Cottonwood Golf Course
3121 Willow Glen Drive
El Cajon, CA

EnviromINE Inc.
3511 Camino Del Rio South, Suite 403
San Diego, CA 92108

Checked By:
JWR

Figure No:

4

Drawn By:
ZR

Date: 10/14/2020

**APPENDIX A
PHOTOGRAPHS**

Photograph 1: View of main parking lot along Willow Glen Drive looking northwest.

Photograph 2: View of parking near facility entrance near Willow Glen Drive looking east.

Photograph 3: View of Clubhouse looking east.

Photograph 4: View of south side of Clubhouse looking west. Septic tanks and leach field for clubhouse are under grass on left side of view.

Photograph 5: View of south side of Clubhouse looking west. Aboveground grease trap for kitchen sewage visible in center of view.

Photograph 6: View of south side of Clubhouse. Septic tank for kitchen sewage visible in center of view, blue arrows point to lids.

Photograph 7: View of golf cart wash and charging area looking west. Sand trap for wash water in center of view. Wash water is reported to discharge to a nearby pond.

Photograph 8: View of second sand trap at entrance to golf cart wash and charging area looking east.

Photograph 9: View of propane AST located west of the clubhouse the supplies the kitchen.

Photograph 10: View of adjoining property to the east and eastern end of Site. Willow Glen Drive and adjacent residential properties in foreground.

Photograph 11: View of east end of facility and adjoining properties to the south. Willow Glen Drive and adjacent residential properties visible in foreground.

Photograph 12: View of fairways along channel of Sweetwater River looking northeast. Driving range area of facility is in background.

Photograph 13: View of fairways along channel of Sweetwater River looking southwest.

Photograph 14: Detail view of water well between clubhouse and maintenance area in fairway along channel of Sweetwater River.

Photograph 15: View of fairways from southern side of site south of clubhouse looking north.

Photograph 16: View of property boundary and adjacent property to the south of site from location south of clubhouse.

Photograph 17: View of fairways from southern side of site south of clubhouse looking east.

Photograph 18: View of artificial pond on adjacent property to the south of site from northeast area of the site looking southwest.

Photograph 19: View of natural drainage from adjacent property to the south of site from northeast area of the site looking northeast.

Photograph 20: View of fairway and trees along property line with adjacent property to the south of site from northeast area of the site looking east.

Photograph 21: View of typical restrooms along fairways. Location is in the northeast area of the site.

Photograph 22: View of fairway and surrounding area at northernmost area of site looking northeast.

Photograph 23: View of artificial pond and surrounding area at northernmost area of site looking east.

Photograph 24: View of adjacent property along northern property boundary of site looking northeast.

Photograph 25: View of water well on site along northern property boundary.

Photograph 26: View of storm drain pipe from Willow Glen Drive that discharges to channel of Sweetwater River at northernmost area of site.

Photograph 27: View of Sweetwater River channel at northernmost area of site looking southwest. Property boundary is at top of slope on right side of view. Willow Glen Drive is at top of slope, residences are on opposite side of Willow Glen Drive.

Photograph 28: Detail view of Sweetwater River channel at northernmost area of site looking southwest. Underlying granitic rock is exposed in bottom of channel.

Photograph 29: View of fairways looking southwest from northernmost area of site along Willow Glen Drive.

Photograph 30: View of Sweetwater River Channel looking southwest north of northernmost facility bridge over channel.

Photograph 31: View of Sweetwater River Channel looking northeast from northernmost facility bridge over channel. Willow Glen Drive is left of view behind trees.

Photograph 32: View of water well in driving range area looking southwest. Sweetwater River Channel on right side of view.

Photograph 32: Detail view of typical SDG&E owned oil filled transformers on the site. All appeared to be in good condition and were free of apparent leaks.

Photograph 34: View of water distribution system near well north of maintenance area in fairway. Sweetwater River Channel on left side of view.

Photograph 35: View of water well north of maintenance area in fairway. Sweetwater River Channel is behind well.

Photograph 36: View of electrical distribution towers that cross site between maintenance area and Steel Canyon Road Bridge.

Photograph 37: View of fairways and Sweetwater River Channel on right side of view between maintenance area and Steel Canyon Road Bridge looking southwest. The bridge is visible in background of view.

Photograph 38: View of Sweetwater River Channel between maintenance area and Steel Canyon Road Bridge looking southwest.

Photograph 39: View of Sweetwater River Channel and Steel Canyon Road Bridge area looking south.

Photograph 40: View of fairway between Sweetwater River Channel and Willow Glen Drive southwest of Steel Canyon Road Bridge looking northeast. The area west of Steel Canyon Road is not currently irrigated and has been allowed to go fallow.

Photograph 41: View of fairway between southwest of Steel Canyon Road Bridge looking south. The area west of Steel Canyon Road is not currently irrigated and has been allowed to go fallow.

Photograph 42: Detail view of typical SDG&E owned oil filled transformers on the site in western area of site. All appeared to be in good condition and were free of apparent leaks.

Photograph 43: View of artificial pond in western area of site looking east. The area west of Steel Canyon Road is not currently irrigated and has been allowed to go fallow.

Photograph 44: View of fairways in western area of site looking east. The area west of Steel Canyon Road is not currently irrigated and has been allowed to go fallow.

Photograph 45: View of fairways in western area of site looking south. The area west of Steel Canyon Road is not currently irrigated and has been allowed to go fallow.

Photograph 46: View of water distribution system near artificial pond in western area of site.

Photograph 47: View of western property line in western area of site looking north toward Willow Glen Road.

Photograph 48: View of western property line in western area of site looking south from Willow Glen Road. Adjacent commercial properties on right side of view.

Photograph 49: View of Willow Glen Road along northern property line on westernmost area of site.

Photograph 50: View of water well casing located along the middle area of western property boundary.

Photograph 51: View of operational water well (based on vibration) located along the middle area of western property boundary near well casing in photograph 49.

Photograph 52: View of westernmost projection of property and adjacent property looking west.

Photograph 53: View of westernmost projection of property and adjacent property looking south.

Photograph 54: View of water well (blue arrow) located along the southern property boundary. Landmarks are very large eucalyptus tree on right and tall palm tree in background.

Photograph 55: View of fairways in western area of site looking east along southern border. The area west of Steel Canyon Road is not currently irrigated and has been allowed to go fallow.

Photograph 56: View of fairways in western area of site looking east along southern border with adjacent large lot residential homes.

Photograph 57: View of artificial pond in western area of site near Steel Canyon Road looking south along southern border with adjacent large lot residential homes.

Photograph 58: View of Sovereign Health of California facility along property boundary with site at southeast side of Steel Canyon Road looking north.

Photograph 59: View of fairway east of Steel Canyon Road looking south along southern border with adjacent large lot residential homes.

Photograph 60: View of Ivanhoe Ranch Road south of site looking northeast.

Photograph 61: View of property boundary with large lot residential homes on south side of site east of Steel Canyon Road looking north from Ivanhoe Ranch Road.

Photograph 62: View of property boundary on south side of site east of Steel Canyon Road looking at gated entrance to Ivanhoe Ranch Road.

Photograph 63: View of fairways north of property boundary on south side of site near gated entrance to Ivanhoe Ranch Road.

Photograph 64: View of fairways north of property boundary on south side of site looking east near gated entrance to Ivanhoe Ranch Road.

Photograph 65: View of residential development on north side of intersection of Steel Canyon Road and Willow Glen Drive looking north across Willow Glen Drive.

Photograph 66: View of residence on south side of Willow Glen Drive at 3629 Willow Glen Drive.

Photograph 67: View of typical conditions along Willow Glen Drive east of Clubhouse at 2850 Willow Glen Drive.

Photograph 68: View of maintenance area looking east, building on right is the southernmost building. Red colored fresh oil supply drums visible on right side of view.

Photograph 69: View of maintenance area looking east, building on left is the central building.

Photograph 70: View of 1,000 gallon single wall diesel fuel AST with secondary containment. Minor staining of concrete block from fuel was noted, secondary containment was free of liquids. View is north of northernmost maintenance building looking west.

Photograph 71: View of 500 gallon double walled gasoline AST with secondary containment. Secondary containment was free of liquids.

Photograph 72: View of empty polyethylene water and fertilizer holding tank. Tank is intended to be placed on trailer for use.

Photograph 73: View of typical equipment in maintenance area.

Photograph 74: View of typical equipment in maintenance area.

Photograph 75: View of typical equipment in maintenance area.

Photograph 76: View of trash dumpsters and cardboard recycling container.

Photograph 77: View of stockpiled tires near trash dumpsters area.

Photograph 78: View of chemical and fertilizer storage room. Chemical are measured and mixed for application in this area.

Photograph 79: View of chemical and fertilizer storage room. Chemical are measured and mixed for application in this area.

Photograph 80: View of chemical and fertilizer storage room and air compressor for maintenance area.

Photograph 81: View of applicator tank fill area. Basin does not drain; spilled water is allowed to evaporate. No accumulation of waste was noted in basin. Eye wash station is just to the left of view.

Photograph 82: View of stored fertilizer.

Photograph 83: View of waste oil and used oil filter drums on secondary containment basin inside maintenance building.

Photograph 84: View of fresh oil supply drums on secondary containment basin inside maintenance building.

APPENDIX B
EDR REPORTS



INQUIRY #: 6204246.8

YEAR: 1953

— = 750'



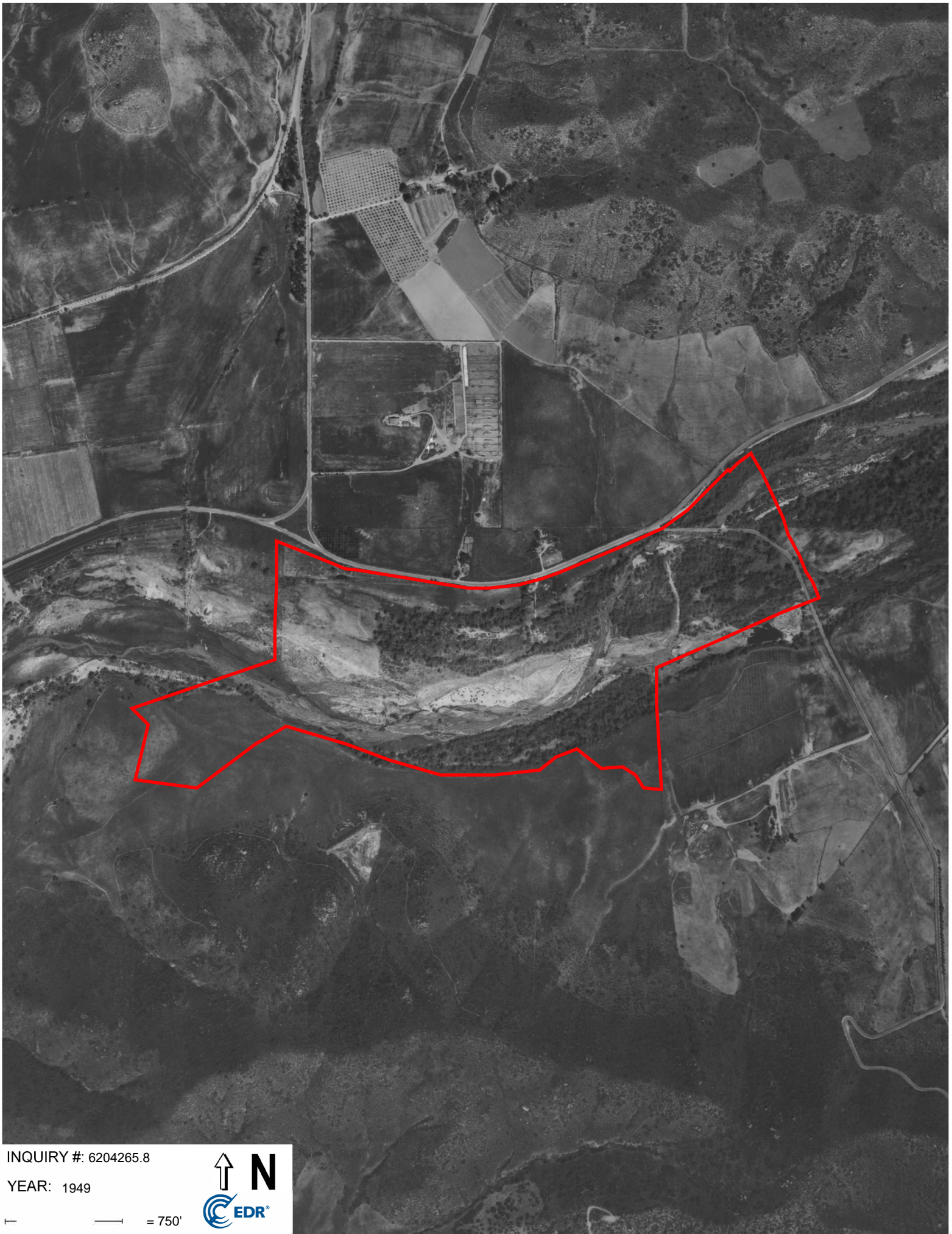


INQUIRY #: 6204265.8

YEAR: 1953

— = 750'





INQUIRY #: 6204265.8

YEAR: 1949

— = 750'



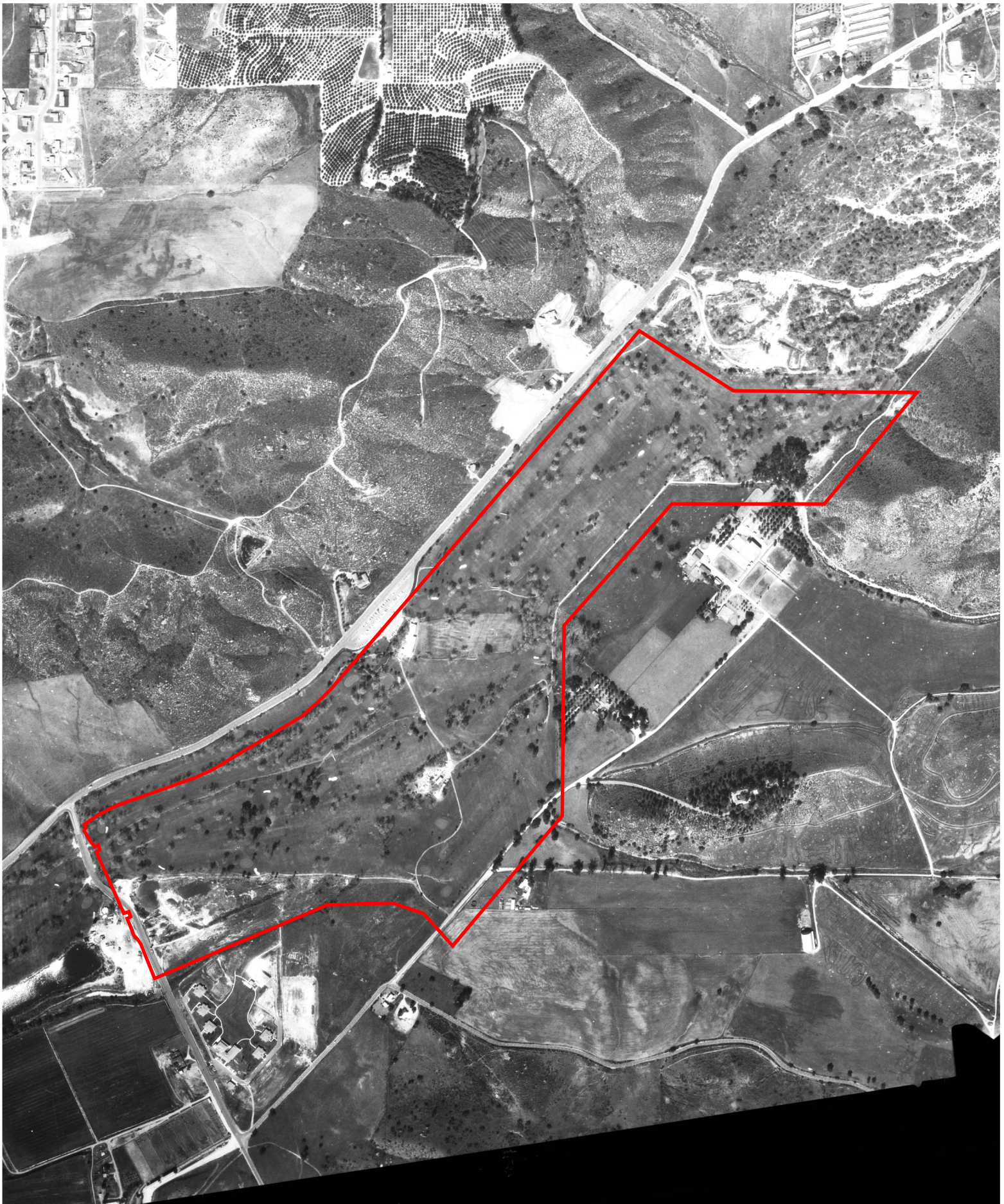


INQUIRY #: 6204265.8

YEAR: 1964



1" = 750'



INQUIRY #: 6204246.8

YEAR: 1970

1" = 750'





INQUIRY # 6204265.8

YEAR: 1970

= 750'



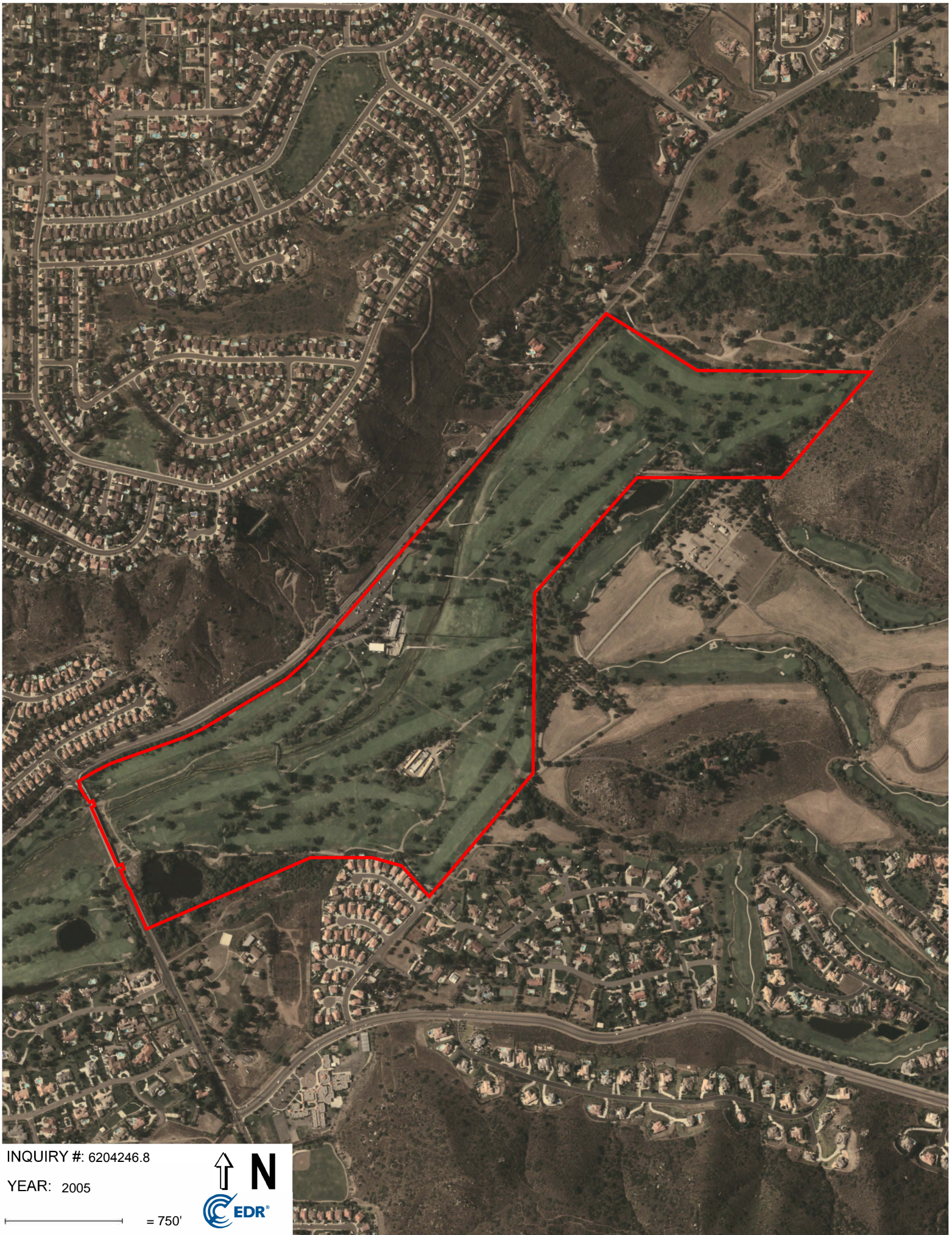


INQUIRY #: 6204265.8

YEAR: 1966

— = 750'





INQUIRY #: 6204246.8

YEAR: 2005

— = 750'

