



GROUP DELTA

LSA
1500 Iowa Avenue, Suite 200
Riverside, CA 92507

August 4, 2020
Project No. EN8052

Attention: Dionisios Glentis, Senior Environmental Planner

Subject: Environmental Due Diligence Review
Slover and Juniper Industrial Building Project
16726 Slover Avenue (APN: 0251-203-09-0000)
Fontana, California

Dear Mr. Glentis,

Group Delta Consultants, Inc. (Group Delta) is pleased to submit to LSA this Environmental Due Diligence Review for the for the proposed Slover and Juniper Industrial Building Project. The project site encompasses Assessor's Parcel Number (APN) 0251-203-09 and is located at 16726 Slover Avenue in Fontana, California (Site). In conducting this review, Group Delta reviewed a Phase I Environmental Site Assessment (ESA) report prepared for the Site by Partner Engineering and Science, Inc. (Partner) dated June 17, 2020.

PROJECT DESCRIPTION

Based on information provided by LSA, it is our understanding the Site is a vacant unoccupied residential property totaling approximately 2.14 acres, located on the northeast corner of Slover Avenue and Juniper Avenue in Fontana, California. The Site currently consists of a dwelling, garage structure, and two concrete pads. The Site is being considered for a new commercial/industrial logistics and distribution building with associated parking stalls.

DUE DILIGENCE REVIEW

Phase I ESA Evaluation

A Phase I ESA report was prepared for the Site by Partner Engineering and Science, Inc. dated June 17, 2020. It is reported that the Phase I ESA was developed in conformance with the provisions of American Society for Testing and Materials (ASTM) Practice E 1527-13 and the Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312). The assessment included: 1) a property and adjacent site reconnaissance; 2) interviews with key personnel; 3) a review of historical sources; 4) a review of regulatory agency records, and; 5) a review of a regulatory database report provided by a third-party vendor.

The purpose of the Phase I ESA is to review, evaluate, and document present and past land use and practices, and visually examine Site conditions in order to identify Recognized Environmental Conditions (RECs). The term REC is defined 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 Phase I ESA did not identify any RECs during the course of the assessment.

Group Delta is in general agreement with these findings. Based upon Group Delta's review of the Phase I report, and its attachments, there is no information provided indicating that a release of hazardous substances or petroleum products has occurred at the Site or that any conditions on the Site meet the criteria necessary to be considered an REC. Group Delta also reviewed readily available online databases including the Department of Toxic Substances Control's (DTSC's) Envirostor database and the State Water Resources Control Board's (SWRCB's) GeoTracker database and the results of that review corroborate this finding.

Site History

Research conducted during the performance of the Phase I ESA indicates that the Site was part of a larger orchard, presumed to have been a citrus orchard, from at least as far back as 1938 through the end of World War II. There may have been agricultural structures within the orchard; however, these were removed by 1959. The mid-1950s marked the beginning of a transition away from agriculture toward residential and commercial/industrial land use at and around the Site.

According to the Phase I ESA, the Site and surrounding area was partially or completely cleared of trees to make way for a residence, garage, and a few other structures by 1959. It appears the property was used for residential purposes from this time until at least 2017. The property has been vacant since approximately 2019.

Notable Environmental Conditions

Although no RECs were noted for the Site, the following notable environmental conditions were identified by Group Delta:

1. The Site was utilized as a citrus orchard from at least as far back as 1938 until the early 1950s. Pesticides were widely used throughout the United States during this period; however, historical aerial photographs of the Site did not indicate evidence of any aboveground storage tanks that may have been used to store or mix pesticides, nor do they show distressed vegetation which may have resulted from pesticide overuse.
2. According to the Phase I ESA, approximately one dozen used oil filters were identified in the eastern portion of the site, adjacent to existing concrete pad areas. The filters were

presumed to have originated from the residential use of the property. No obvious soil staining was observed in the vicinity of the filters; however, the majority of the area was covered in wood chips that obstructed direct observation of the soil at the Site.

3. According to the Phase I ESA, a former septic system was filled and abandoned at the Site. The former septic system is located just north of the dwelling structure at the property.
4. Based on available aerial photographs, the buildings at the Site predate the restrictions on using asbestos-containing materials (ACMs) and lead-based paint (LBP). As such, it is possible that the structures contain ACMs and LBP, although Partner did not observe any obvious hazardous conditions, such as damaged and friable ACMs, on the exteriors of the onsite buildings.

CONCLUSIONS AND RECOMMENDATIONS

Group Delta has reviewed the existing Phase I ESA report. Based upon the review of this report, Group Delta is presenting the following conclusions and recommendations:

1. The Site was utilized as a citrus orchard from at least as far back as 1938 until the early 1950s. The project proponent should consider whether conducting a limited screening of shallow soil at the Site for organochlorine pesticides is warranted for the scope of their redevelopment activities.
2. Approximately twelve (12) used oil filters were identified at the Site, directly on soil/within wood chips. According to Partner, no obvious signs of staining or release were associated with the wood chips. The filters and any potentially impacted soils underlying the filters should be disposed under proper waste handling protocols. Based upon the observed condition of soil in this area, the project proponent should consider whether conducting a limited screening of shallow soil at the Site in the vicinity of the filters for petroleum hydrocarbons is warranted for the scope of the redevelopment activities.
3. A septic system was reportedly filled and abandoned in place at the Site. It is unknown if other subsurface features were removed from the Site and/or surrounding site area. The project should be prepared to encounter these features during the early phases of construction.
4. A survey for hazardous building materials, including ACM and LBP, should be conducted for the Site's remaining structures prior to demolition and redevelopment of the Site. The survey will determine hazardous building materials abatement and monitoring requirements, as well as worker health and safety requirements, during site demolition and construction.

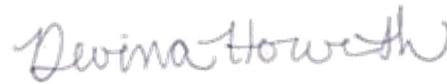
CLOSING

Thank you for allowing Group Delta to be your consultants on this project. Please feel free to call us at 949-450-2100 if you have any questions on the contents of this letter.

Sincerely,
Group Delta



Glenn Burks, Ph. D., P.E.
Director of Environ. Services



Devina Horvath
Project Geologist