

## **Appendix I**

### **Phase I Environmental Site Assessment**

# **PHASE I ENVIRONMENTAL SITE ASSESSMENT**

**Prepared in General Accordance with:  
ASTM E 1527-21 Standard Practice for Environmental Site Assessments**

## **Boulevard Starlight Solar**

**Portions of Assessor's Parcel Numbers 612-082-12; 612-090-59 and -68; 612-110-02, -04, and -17 through -19; 612-120-01; 659-020-01, -02, -05, and -06; and 659-080-02 and -08  
Boulevard, California**

For:

Empire II, LLC  
12302 Exposition Boulevard  
Los Angeles, CA 90068  
Attn: Chris Fahey

By:

Michael Baker International  
5 Hutton Centre Drive, Suite 500  
Santa Ana, CA 92707

August 10, 2023

JN 185614

August 10, 2023

Empire II, LLC  
12302 Exposition Boulevard  
Los Angeles, CA 90068  
Attn: Chris Fahey

**SUBJECT: Phase I Environmental Site Assessment for Boulevard Starlight Solar (Portions of Assessor's Parcel Numbers 612-082-12; 612-090-59 and -68; 612-110-02, -04, and -17 through -19; 612-120-01; 659-020-01, -02, -05, and -06; and 659-080-02 and -08)**

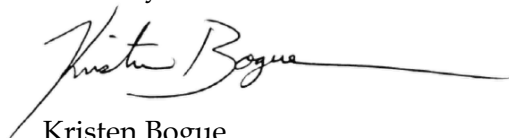
Dear Mr. Fahey,

Michael Baker International (Michael Baker), is pleased to submit this Phase I Environmental Site Assessment (ESA) for Areas A through G of the Boulevard Starlight Solar Project in Boulevard, California, herein referenced as the "subject property." The goal of this Phase I ESA is to identify recognized environmental conditions (RECs) associated with the subject property. This Phase I ESA has been prepared for the sole use of Empire Ranch II, LLC partners, banks, lenders or as assigned, for the above-referenced subject property. Neither this Phase I ESA, nor any of the information contained herein, shall be used or relied upon for any purpose by any person or entity other than Empire Ranch II, LLC partners, banks, lenders or as assigned.

The Phase I ESA was prepared using methods consistent with the ASTM International (6ASTM) E 1527-21 Standard Practice for Environmental Site Assessments, the scope of services, and inherent limitations presented in our proposal. The Phase I ESA is not intended to present specific quantitative information as to the actual presence of hazardous substances on or adjacent to the subject property, but is to identify RECs based on available information.

Should you or your staff have any questions or concerns after reviewing the enclosed report, please do not hesitate to contact me at 949/855-5747.

Sincerely,



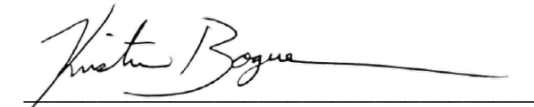
Kristen Bogue  
Environmental Professional  
Environmental Services

# STATEMENT OF ENVIRONMENTAL PROFESSIONAL

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I [We] declare that, to the best of [my, our] professional knowledge and belief, [I, we] meet the definition of *Environmental Professional* as defined in §312.10 of Title 40, Code of Federal Regulations (CFR) §312.

[I, We] have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the *subject property*. [I, We] have developed and performed *all appropriate inquiries* in conformance with the standards and practices set forth in 40 CFR. Part 312.

A handwritten signature in black ink, reading "Kristen Bogue", written over a horizontal line.

Signature of Michael Baker Environmental Professional

Kristen Bogue

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# LIST OF ACRONYMS

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ACM	Asbestos Containing Materials
APN	Assessor's Parcel Number
AST	Aboveground Storage Tank
ATSDR	Agency for Toxic Substances and Disease Registry
AULs	Activity and Use Limitations
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System (maintained by the Environmental Protection Agency)
CFR	Code of Federal Regulations
CORRACTS	facilities subject to Corrective Action under RCRA
CPSC	United States Consumer Product Safety Commission
DDD	Dichlorodiphenyldichloroethane
DDE	Dichlorodiphenyldichloroethylene
DDT	Dichlorodiphenyltrichloroethane
DOGGR	California Department of Oil, Gas, and Geothermal Resources
DTSC	Department of Toxic Substances Control
EDR	Environmental Data Resources
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right to Know Act (also known as SARA Title III), 42 U.S.C. §§11001-11050 et seq.)
ERNS	emergency response notification system
ESA	Environmental Site Assessment
FOIA	U.S. Freedom of Information Act (5 U.S.C. §552 as amended by Public Law No. 104-231, 110 Stat.)
FR	Federal Register
HREC	Historical Recognized Environmental Condition
ICs	Institutional Controls
LBP	Lead Based Paints
LUFT	Leaking Underground Fuel Tank
LUST	Leaking Underground Storage Tank
MSDS	Material Safety Data Sheet
msl	Mean sea level
NCP	National Contingency Plan
NFRAP	former CERCLIS sites where no further remedial action is planned under CERCLA
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List

PCBs	Polychlorinated Biphenyls
REC	Recognized Environmental Condition
RCRA	Resource Conservation and Recovery Act (as amended, 42 U.S.C. §§6901 et seq.)
RWQCB	Regional Water Quality Control Board
SBBM	San Bernardino Base and Meridian
SCS	Soil Conservation Service
TPH	Total Petroleum Hydrocarbons
TRI	Toxics Release Inventory
TSDF	hazardous waste treatment, storage, or disposal facility
USDA	United States Department of Agriculture
USGS	United States Geological Survey
UST	Underground Storage Tank

# EXECUTIVE SUMMARY

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Michael Baker has performed a Phase I ESA in conformance with the scope and limitations of ASTM E 1527-21 Standard Practice of the Boulevard Starlight Solar project (portions of Assessor's Parcel Numbers 612-082-12; 612-090-59 and -68; 612-110-02, -04, and -17 through -19; 612-120-01; 659-020-01, -02, -05, and -06; and 659-080-02 and -08), in Boulevard, California, the subject property. Any exceptions to, or deletions from, this practice are described in Section 7.2, *Limiting Conditions/Deviations*, of this Phase I ESA. This Phase I ESA has revealed the following evidence of RECs in connection with the subject property:

- **On-site railroad tracks at Area G** – Based on a review of historic documentation, a portion of the San Diego Eastern Railway (later named the San Diego and Imperial Valley Railroad) was apparent on the proposed access road to Area G by 1939. The railroad is no longer operational. Railroad tracks are typically associated with the use of pesticides and arsenic and the presence of gasoline, diesel, and/or creosote underneath and surrounding the railroad is likely. Therefore, it is Michael Baker's opinion that the former on-site railroad track is considered a REC at the time of this Phase I ESA.

Section 6.0, *Findings and Opinions*, documents Michael Baker's findings and opinions as to whether or not a REC (or Conditional Recognized Environmental Condition [CREC]) or data gap are present at the subject property.

# SECTION 1.0

## INTRODUCTION

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### 1.1 PURPOSE

The purpose of conducting this Phase I Environmental Site Assessment (ESA) is to identify Recognized Environmental Conditions (RECs) as defined by the ASTM International (ASTM) E 1527-21 Standard Practice for Environmental Site Assessments (Standard Practice). The ASTM E 1527-21 Standard Practice defines the term REC as “(1) the presence of any hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the likely presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.” De minimis conditions are conditions related to a release that generally do 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. A de minimis condition is not a REC.

This Phase I ESA was conducted in accordance with the ASTM E 1527-21 Standard Practice and satisfies the requirements of 40 Code of Federal Regulations (CFR) Part 312 titled *Standards and Practices for All Appropriate Inquiries*, as required under Section 101(35)(B)(ii) and (iii) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The purpose of conducting an All Appropriate Inquiries (AAI) investigation into the previous ownership and uses of a property is to meet the provisions necessary for the innocent landowner, contiguous property owner, or bona fide prospective purchaser to qualify for certain landowner liability protections under CERCLA. To assist in understanding the terminology contained in this Phase I ESA, a glossary of terms associated with the ASTM E 1527-21 Standard Practice is provided in Appendix A, ASTM Terminology.

### 1.2 DETAILED SCOPE OF SERVICES

This scope of work follows the ASTM E 1527-21 Standard Practice. The ASTM E 1527-21 Standard Practice outlines a procedure for completing Phase I ESAs that includes review of Federal, tribal, State, and local government records; site reconnaissance; interviews with current owners, operators, occupants, and government officials; and report preparation. This practice does not include any testing or sampling of materials (for example, soil, water, air, building materials, etc.).

This Phase I ESA is not intended to provide specific qualitative or quantitative information as to the actual presence of hazardous substances at the subject property, but is to merely identify the potential presence based on available information.

### 1.3 SIGNIFICANT ASSUMPTIONS

Unless stated otherwise in this Phase I ESA, Michael Baker assumes that groundwater flow follows the topography of the subject property.

In lieu of reasonably available public information pertaining to groundwater contamination, Michael Baker assumes that groundwater plume dimensions are within the 90<sup>th</sup> percentile of plumes determined by research conducted as part of ASTM E 2600-10 Standard Guide for Vapor Encroachment Screening on Property Involved in real Estate Transactions; refer to Table 1-1, Groundwater Plume Dimension Assumptions.

**Table 1-1**  
**Groundwater Plume Dimension Assumptions**

Chemical Contamination	Length of Plume Up-Gradient From Source	Length of Plume Down-Gradient from Source	Maximum Width of Plume From Source
Chemical of Concern	100 feet	1,760 feet	365 feet
Petroleum Hydrocarbon Chemical of Concern			
With Free Product	100 feet	528 feet	165 feet
Dissolved	100 feet	528 feet	95 feet
Notes: These dimension assumptions are based on research conducted as part of ASTM E 2600-10 Standard Guide for Vapor Encroachment Screening on Property Involved in real Estate Transactions, which has determined that 90 percent of plumes are these dimensions or less.			
Source: Anthony J. Buonicore, <i>Methodology for Identifying the Area of Concern Around a Property Potentially Impacted by Vapor Migration from Nearby Contaminated Sources</i> , Paper 2011-A-301-AWMA, June 2011.			

### 1.4 LIMITATIONS, DEVIATIONS, AND EXCEPTIONS

Due to the size of the subject property and areas of undeveloped brush, Michael Baker's observation of the subject property was conducted primarily as a drive-by survey on June 20, 2023. As such, limited visibility was present for various areas of the subject property. Based on a review of available sources discussed throughout this Phase I ESA, no indication of current or past activities were noted. Therefore, it is the opinion of Michael Baker that limiting condition is not a significant data gap.

No other limitations, deviations, or exceptions were encountered during the preparation of this Phase I ESA. Further, no additional scope items, or items outside of the scope of a Phase I ESA E 1527-21 Standard Practice, were conducted as part of this Phase I ESA.

## 1.5 USER RESPONSIBILITIES

This Phase I ESA does not satisfy continuing obligations under CERCLA liability protections provided for innocent landowners, bona fide prospective purchasers, and contiguous property owners, which includes, but is not limited to, duties required after property acquisition (i.e., compliance with land use restrictions and institutional controls, undertaking “reasonable steps” with respect to hazardous substances releases, compliance with other obligations such as reporting obligations and information requests, etc.).

ASTM E 1527-21 Standard Practice defines the user as “the party seeking to use Practice E 1527 to complete an environmental site assessment of the subject property.” The purpose of this section is to describe tasks to be performed by the user that will help identify the possibility of recognized environmental conditions in connection with the subject property. These tasks do not require the technical expertise of an environmental professional and are not required to be performed by environmental professional performing a Phase I ESA. The user questionnaire utilized within this Phase I ESA is optional to the user and aids the environmental professional in gathering information from the user that may be material to identifying RECs (refer to [Section 2.0, \*User Provided Information\*](#), for a discussion of the User Questionnaire conducted as part of this Phase I ESA. It should be noted that the following tasks are required, by the user of this Phase I ESA, to satisfy the requirements of conducting all appropriate inquiries.

### 1.5.1 REVIEW LAND TITLE AND JUDICIAL RECORDS FOR ENVIRONMENTAL LIENS AND ACTIVITY AND USE LIMITATIONS (AULS)

To meet the requirements of 40 CFR 312.20 and 312.25, a search for the existence of environmental liens and AULs that are filed or recorded against the subject property must be conducted. Environmental liens and AULs are legally distinct instruments and have very different purposes and both can commonly be found within recorded land title records (e.g., County Recorder/Registry of Deeds). The types of title reports that may disclose environmental liens and AULs include Preliminary Title Reports, Title Commitments, Condition of Title, and Title Abstracts. Chain of title reports will not normally disclose environmental liens or AULs. Environmental liens and AULs that are imposed by judicial authorities may be recorded or filed in judicial records only. In jurisdictions where environmental liens or AULs are only recorded or filed in judicial records, the judicial records must be searched for environmental liens and AULs. Any environmental liens and AULs known to the user should be reported to the environmental professional conducting a Phase I Environmental Site Assessment. Unless added by a change in the scope of work to be performed by the environmental professional (refer to [Section 1.4, \*Limitations, Deviations, and Exceptions\*](#)), this practice does not impose on the environmental

professional the responsibility to undertake a review of recorded land title records and judicial records for environmental liens or activity and use limitations. The user should either (1) engage a title company or title professional to undertake a review of reasonably ascertainable recorded land title records and lien records for environmental liens or activity and use limitations currently recorded against or relating to the property, or (2) negotiate such an engagement of a title company or title professional as an addition to the scope of work to be performed by the environmental professional.

#### **1.5.1.1 Reasonably Ascertainable Title and Judicial Records for Environmental Liens and Activity and Use Limitations**

Environmental liens and AULs that are recorded or filed in any place other than recorded land title records are not considered to be reasonably ascertainable unless applicable Federal, tribal, State, or local statutes, or regulations specify a place other than recorded land title records for recording or filing of environmental liens and AULs.

### **1.5.2 SPECIALIZED KNOWLEDGE OR EXPERIENCE OF THE USER**

Users must take into account their specialized knowledge to identify conditions indicative of releases or threatened releases. If the user has any specialized knowledge or experience that is material to RECs in connection with the subject property, the user should communicate any information based on such specialized knowledge or experience to the environmental professional. The user should do so before the environmental professional conducts the site reconnaissance.

### **1.5.3 ACTUAL KNOWLEDGE OF THE USER**

If the user has actual knowledge of any environmental lien or AULs encumbering the subject property or in connection with the subject property, the user should communicate such information to the environmental professional. The user should do so before the environmental professional conducts the site reconnaissance.

### **1.5.4 REASON FOR SIGNIFICANTLY LOWER PURCHASE PRICE**

In a transaction involving the purchase of a parcel of commercial real estate, the user shall consider the relationship of the purchase price of the subject property to the fair market value of the subject property if the subject property was not affected by hazardous substances or petroleum products. The user should try to identify an explanation for a lower price which does not reasonably reflect fair market value if the subject property were not contaminated, and make

a written record of such explanation. Among the factors to consider will be the information that becomes known to the user pursuant to the Phase I ESA. The ASTM E 1527-21 Standard Practice does not require that a real estate appraisal be obtained in order to ascertain fair market value of the subject property. The user should inform the environmental professional if the user believes that the purchase price of the subject property is lower than the fair market value due to contamination. The user is not required to disclose the purchase price to the environmental professional.

### **1.5.5 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION**

Commonly known or reasonably ascertainable information within the local community about the subject property must be taken into account by the user. If the user is aware of any commonly known or reasonably ascertainable information within the local community about the subject property that is material to recognized environmental conditions in connection with the subject property, the user should communicate such information to the environmental professional. The user should do so before the environmental professional conducts the site reconnaissance. The user must gather such information to the extent necessary to identify conditions indicative of releases or threatened releases of hazardous substances or petroleum products.

### **1.5.6 DEGREE OF OBVIOUSNESS**

The user must consider the degree of obviousness of the presence or likely presence of releases or threatened releases at the subject property and the ability to detect releases or threatened releases by appropriate investigation including the information collected under the following sections within this Phase I ESA:

- Section 1.5.1, Review Land Title and Judicial Records for Environmental Liens and Activity and Use Limitations (AULs);
- Section 1.5.2, Specialized Knowledge or Experience of the User;
- Section 1.5.4, Reason for Significantly Lower Purchase Price;
- Section 1.5.5, Commonly Known or Reasonably Ascertainable Information;
- Section 3.0, Site Reconnaissance;
- Section 4.2, Standard Environmental Records Sources;
- Section 4.4, Historical Use Information on the Subject Property and Adjoining Properties; and
- Section 5.0, Interviews.

### **1.5.7 OTHER**

Either the user shall make known to the environmental professional the reason why the user wants to have the Phase I ESA performed or, if the user does not identify the purpose of the Phase I ESA, the environmental professional shall assume the purpose is to qualify for an LLP to CERCLA liability and state this in the report.

## **1.6 SPECIAL TERMS AND CONDITIONS**

No special terms and conditions were identified for this scope of work.

## **1.7 USER RELIANCE**

The information and opinions rendered in this Phase I ESA are exclusively for use by Empire II, LLC. Michael Baker will not distribute or publish this report without the consent of Empire Ranch II, LLC, except as required by law or court order. The information and opinions expressed in this Phase I ESA are given in response to Michael Baker's scope of services and limitations indicated above, and should be considered and implemented only in light of the scope of services and limitations. The services provided by Michael Baker in completing this Phase I ESA were consistent with normal standards of the profession. No warranty, expressed or implied, is made.

# SECTION 2.0

## USER PROVIDED INFORMATION

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Per ASTM E 1527-21, the user of the Phase I ESA has an obligation to answer all questions posed by the User Questionnaire, in good faith, to the extent of his or her actual knowledge or to designate a key site manager to do so. If answers to questions are unknown or partially unknown to the user or such key site manager, this section shall not thereby be deemed incomplete.

Empire Ranch II, LLC partners, banks, lenders or as assigned, is the user of this Phase I ESA. On behalf of Empire Ranch II, LLC, Chief Operating Officer Chris Fahey has provided Michael Baker with information regarding the subject property on July 11, 2023, via a User Questionnaire; refer to Appendix B, Documentation. Empire Ranch II, LLC indicated a Phase I ESA is required for a Major Use Permit. Other information/documentation provided by the user is referenced throughout this Phase I ESA, as applicable.

### 2.1 PREVIOUS DOCUMENTS

The user provided two previous documents prepared for the subject property:

- *Notice of Violation of Watercourse Ordinance Section 87.603 – 1664 Jewel Valley Rd., Boulevard, CA* (County of San Diego Department of Public Works [DPW] 2012).
- *Preliminary Geotechnical Site Evaluation Report, Proposed Starlight Solar Project, San Diego County, California* (Bruin Geotechnical Services, Inc. 2022).

The *Notice of Violation* prepared for the subject property is summarized below. Pertinent information from the *Preliminary Geotechnical Site Evaluation Report* is summarized in Section 4.1.4.2, Soils.

In March 2023, DPW prepared a *Notice of Violation* regarding the on-site landing strip. The *Notice of Violation* indicates that the airstrip tangentially intersects a “watercourse” (Jewel Valley Creek) as defined in Section 87.603 of the County’s Watercourse Ordinance and therefore requires a permit. DPW requires either the preparation of a restoration plan and consultation with appropriate regulatory agencies, or the submittal of a grading permit application and plans.

## **2.2 LITIGATION/ADMINISTRATIVE PROCEEDINGS**

The user did not identify any information pertaining to any pending, threatened, or past litigation and/or administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property during the course of this Phase I ESA.

## **2.3 GOVERNMENTAL NOTICES**

The user did not identify any information pertaining to any notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products during the course of this Phase I ESA.

## **2.4 ENVIRONMENTAL LIENS**

The user has not identified any environmental liens filed or recorded against the subject property under Federal, tribal, State, or local law. Further, based on an environmental lien and activity and use limitation search conducted by EDR, no environmental liens were identified for the subject property during the course of this Phase I ESA. Refer to [Appendix B](#).

## **2.5 ACTIVITY AND USE LIMITATIONS**

The user did not identify any AULs, such as engineering controls, land use restrictions, or institutional controls that are in place at the subject property and/or have been filed or recorded against the subject property under Federal, tribal, State, or local law. Further, based on an environmental lien and activity and use limitation search conducted by EDR, no AULs were identified for the subject property during the course of this Phase I ESA. Refer to [Appendix B](#).

## **2.6 SPECIALIZED KNOWLEDGE OR EXPERIENCE**

The user did not identify any specialized knowledge or experience on the subject property during the course of this Phase I ESA.

## **2.7 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES**

The user did not report valuation reduction for environmental issues.

## **2.8 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION**

The user identified that the subject property was previously used for ranching operations. Further, fertilizers and pesticides were used at on-site oak trees.

## **2.9 DEGREE OF OBVIOUSNESS**

The user did not report any obvious indicators that point to the presence or likely presence of chemical releases at the subject property during the course of this Phase I ESA.

## **2.10 REASON FOR PERFORMING PHASE I**

This Phase I ESA has been requested by Empire Ranch II, LLC, who indicated that the Phase I ESA is required for a Major Use Permit with the County of San Diego.

# SECTION 3.0

## SITE RECONNAISSANCE

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According to the ASTM E 1527-21 Standard Practice, the objective of the site reconnaissance is to obtain information indicating the likelihood of identifying RECs in connection with the subject property. The following information pertains to the entirety of the subject property (Areas A through G, the northern gen-tie line area, the on-site landing strip, and a portion of land within the Jewel Valley Road right-of-way, unless specified otherwise).

### 3.1. SUBJECT PROPERTY DESCRIPTION

#### 3.1.1 Location

The subject property is located in the community of Boulevard, unincorporated San Diego County, California; refer to Exhibit 1, *Regional Vicinity*, and Exhibit 2, *Site Vicinity*. The subject property comprises portions of Assessor's Parcel Numbers (APNs) 612-120-01, 612-110-04 and -04, and 612-082-12 (Sections 28, 29, 32, and 33, Township 17 South [T17S], Range 7 East [R7E], San Bernardino Base and Meridian [SBBM]; Sections 5 and 8, Township 18 South [T18S], R7E 36, SBBM); refer to Exhibit 3, *Assessor's Parcel Numbers*. Specifically, the subject property encompasses seven areas (Areas A through G), generally located west of Tule Jim Lane and south of Old Highway 80. Additionally, the subject property includes a proposed gen-tie line area to the northeast of Area A (northeastern gen-tie line area), and a landing strip. Area A is located south of Fisher Road and east and north of Jewel Valley Road, and Areas B through G are generally located south of Jewel Valley Road.

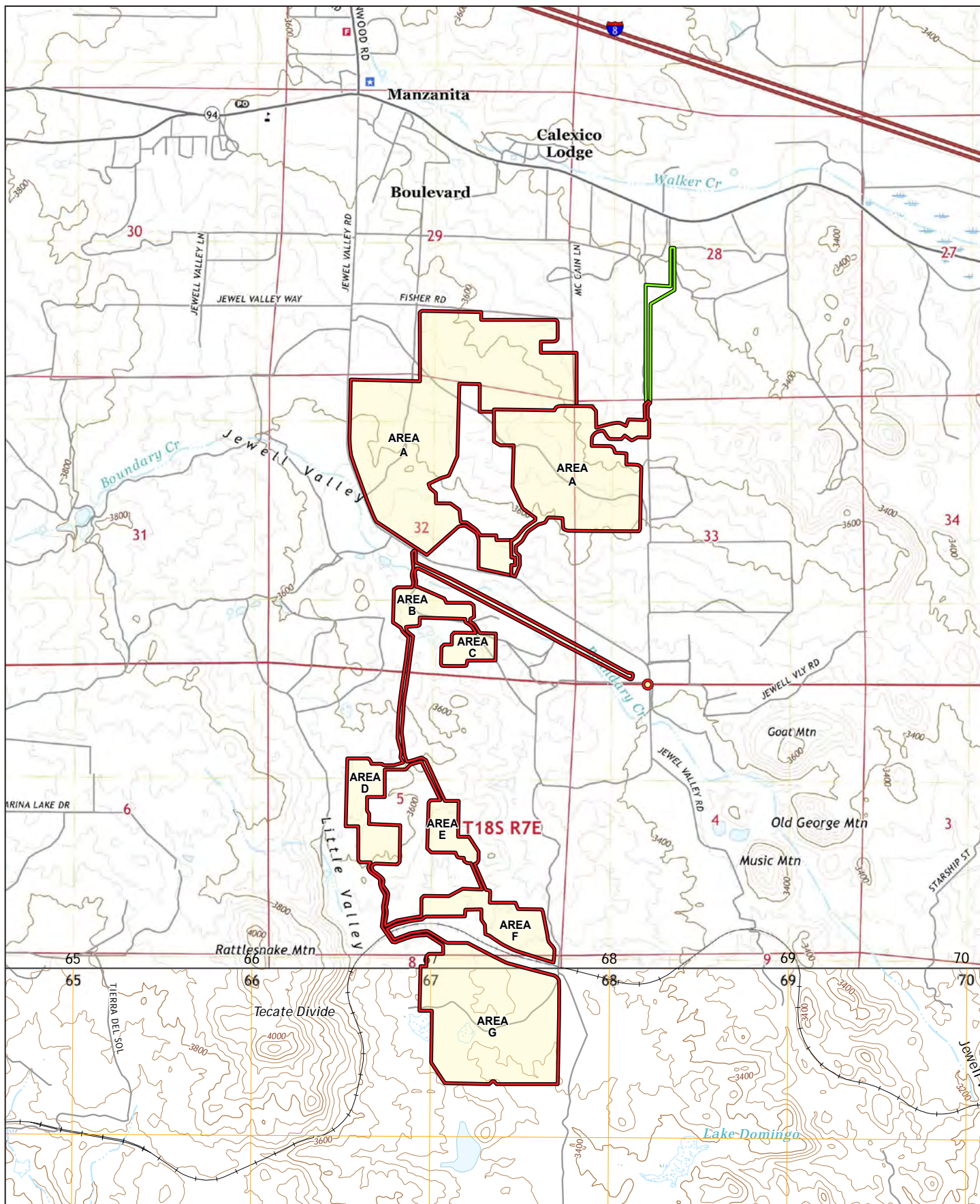
#### 3.1.2 Current Use(s) of the Subject Property

The subject property consists of vacant land; refer to Exhibit 4, *Subject Site*.

#### 3.1.3 Description of On-Site Structures and Roads

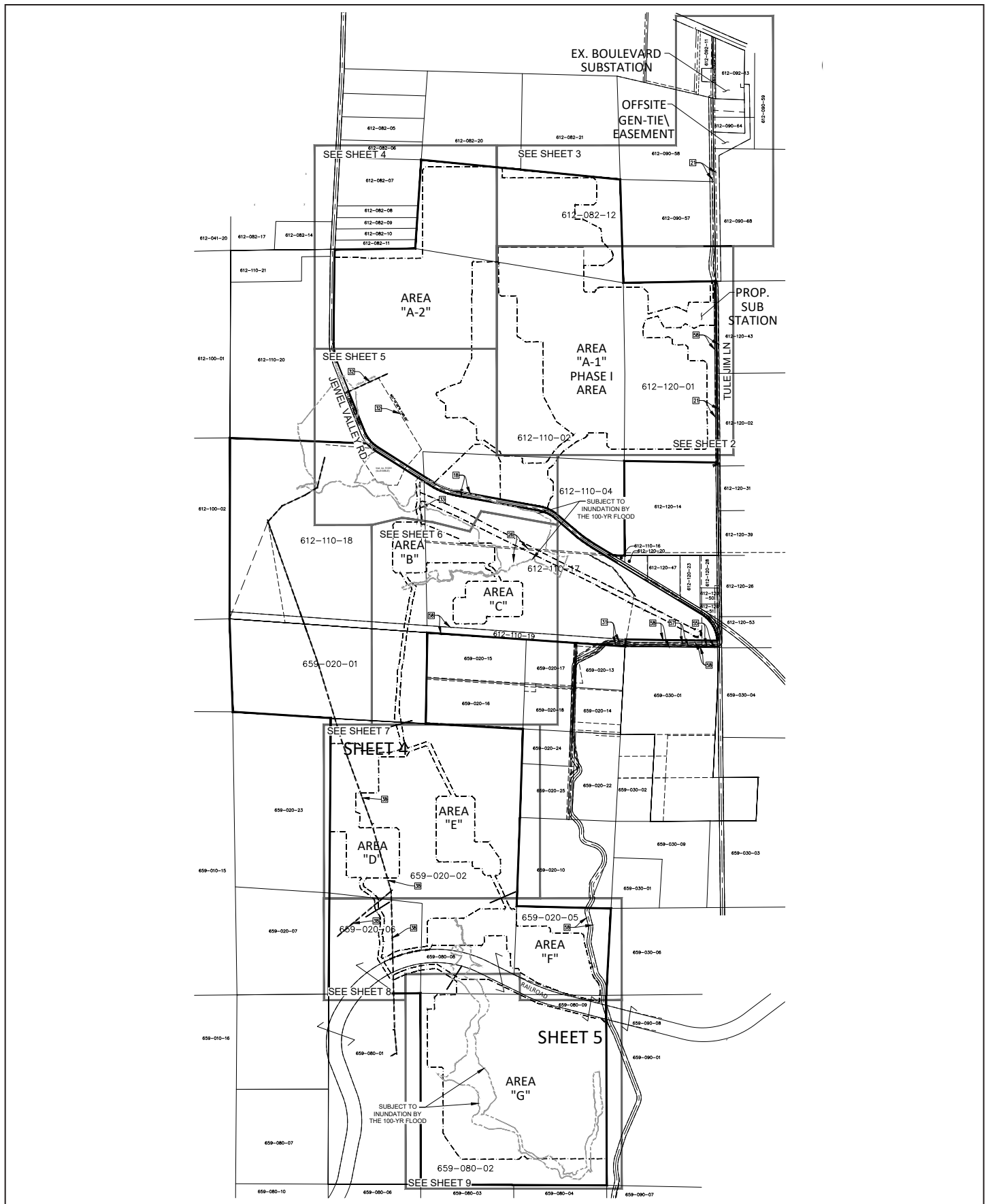
No structures are located on-site. Several unpaved roads are present throughout the subject property. Additionally, an on-site, unpaved landing strip (no longer operational) is located to the northeast of Areas B and C.





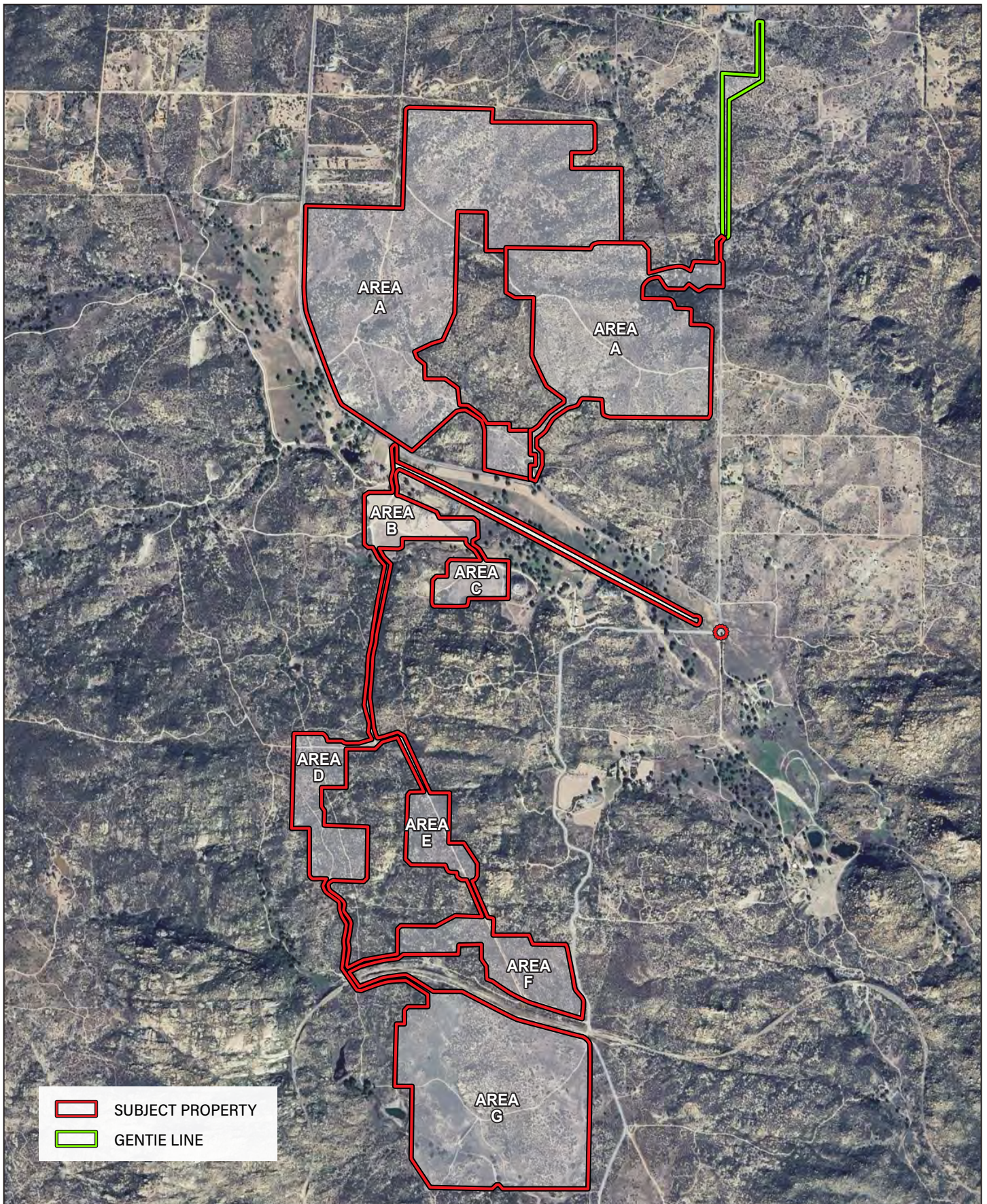
Source: USGS, Live Oak Springs, CA 2021





Source: Michael Baker International, June 2023





## **3.2 METHODOLOGY AND LIMITING CONDITIONS**

### **3.2.1 METHODOLOGY**

Michael Baker performed a visual observation of readily accessible areas of the subject property and immediately adjoining properties (site visit) on June 20, 2023. The subject property was viewed from all public thoroughfares. If roads or paths with no apparent outlet are observed on the subject property, the use of the road or path was identified to determine whether it was likely to have been used as an avenue for disposal of hazardous substances or petroleum products.

### **3.2.2 LIMITING CONDITIONS**

Due to the size of the subject property and areas of undeveloped brush, Michael Baker's observation of the subject property was conducted primarily as a drive-by survey. As such, limited visibility was present for various areas of the subject property.

## **3.3 ON-SITE OBSERVATIONS**

### **3.3.1 DESCRIPTION OF ON-SITE USES**

The subject property consists of vacant land. According to the Key Site Manager, Shauna Dawson (to the best of her knowledge), the subject property has always been vacant with a private landing strip. Refer to [Exhibit 5, On-site Photographs](#), for a typical view of on-site vacant land.

### **3.3.2 DESCRIPTION OF ON-SITE STRUCTURES AND ROADS**

No structures or paved roads are located on the subject property. However, several unpaved roads are present throughout the subject property.

### **3.3.3 DESCRIPTION OF PAST USES OF THE SUBJECT PROPERTY**

No evidence suggesting past on-site uses was noted, with the exception of Areas B, C, and G, as noted below.

### **3.3.3.1 Former Ranching/Grazing Land**

During Michael Baker's site inspection, portions of Area B appeared to consist of former ranching/grazing land (refer to [Exhibit 5](#)). Based on a review of historical documentation, Area B may have been used for ranching/grazing purposes from approximately 1989 to at least 2020.

Additionally, indications of former grazing were apparent on Area C. Based on a review of historical documentation, Area C may have been used for ranching/grazing purposes from approximately 1989 to at least 2020.

### **3.3.3.2 Railroad Tracks**

During Michael Baker's site inspection, railroad tracks were observed on the proposed access road to Area G. Based on a review of historical documentation, a portion of the San Diego and Arizona Eastern Railway (later labeled as the San Diego and Imperial Valley Railroad) was present on-site by 1939. Note, the railroad is no longer operational (refer to [Exhibit 6, Off-site Photographs](#)).

## **3.3.4 HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS**

Michael Baker did not observe hazardous substances and/or petroleum products on the subject property. Two drums were observed on Area G, near the on-site pond (refer to [Exhibit 5](#)). According to Ms. Dawson (to the best of her knowledge), the drums are likely used as a firepit and do not contain hazardous materials. No evidence of hazardous materials storage, nor staining or evidence of leaking was observed.

## **3.3.5 CHEMICAL STORAGE TANKS (ASTS AND USTS)**

During the site inspection, the subject property was inspected for fill pipes, vent pipes, areas of abnormal or heavy staining, manways, manholes, access covers, concrete pads not homogenous with surrounding surfaces, concrete build-up areas potentially indicating pump islands, abandoned pumping equipment, or fuel pumps that suggest the current of historical existence of chemical storage tanks (i.e., ASTs or USTs). Michael Baker did not observe any evidence of chemical storage tanks on the subject property during the site inspection.

## **3.3.6 SPILLS**

Michael Baker did not observe evidence of spills during the site inspection.



Looking southwest at a typical view of onsite vacant land, as shown from the south-eastern portion of Area A.



Looking northeast at a pole-mounted transformer near the southwestern portion of Area A.



Looking south at a pond and two drums in the southwestern portion of Area G.



View of Area B from the central portion, looking northeast.



Looking north at a typical view of adjoining vacant land, as shown from the northern portion of Area D.



Looking south at a pond adjoining Area G to the west.



Looking west-northwest at railroad tracks adjoining Area F and Area G to the southeast and northeast, respectively.



Looking north at adjoining Empire Ranch property.

### **3.3.7 SOLID WASTE DISPOSAL**

No indication of on-site solid waste disposal practices (i.e., landfills) was apparent during the site inspection.

### **3.3.8 UTILITIES**

Typical utilities (i.e., water wells, electrical utilities, etc.) were observed on-site during the site inspection.

#### **3.3.8.1 Polychlorinated Biphenyls (PCBs)**

One pole-mounted transformer was observed in the southwestern portion of Area A. The transformer appeared to be in good condition, and no evidence of leakage or staining was observed (refer to [Exhibit 5](#)). No other indications of PCBs were observed on the subject property.

#### **3.3.8.2 Wells**

One water well was noted in the southwestern portion of Area A, near the pole-mounted transformer. No other water wells were observed within the boundaries of the subject property during the site inspection.

#### **3.3.8.3 Potable Water Supply**

No evidence of water utilities, other than the on-site water well, was noted within the boundaries of the subject property during the site inspection.

#### **3.3.8.4 Sewage Disposal System**

No structures are located on-site; no evidence of an on-site sewage disposal system (including septic systems) was noted during the site inspection.

#### **3.3.8.5 Heating/Cooling**

No structures are located on-site; Michael Baker did not observe heating or cooling systems during the site inspection.

### **3.3.9 DRAINS AND SUMPS**

No structures are located on-site; no storm drains or sumps were noted during the site inspection.

### **3.3.10 PITS, PONDS, LAGOONS**

A pond was observed near the southwestern portion of Area G. No evidence of sheening was observed to suggest a release of hazardous materials or petroleum products. No other pits, ponds, or lagoons were observed on the subject property.

## **3.4 OFF-SITE OBSERVATIONS**

An adjoining property is considered any real property or properties that the border of which is contiguous or partially contiguous with that of the subject property, or that would be contiguous or partially contiguous with that of the subject property but for a street, road, or other public thoroughfare separating them. An adjacent property is any real property located off-site, which is not adjoining. Visual observations of the publicly accessible portions of adjoining properties were conducted on June 20, 2023, as part of this Phase I ESA and are described below.

### **3.4.1 DESCRIPTION OF CURRENT AND PAST USES OF THE SURROUNDING AREA**

Current uses of the surrounding area primarily consist of ranching operations, rural residential land uses, a San Diego Gas and Electric (SDGE) facility, commercial uses, various public service facilities (e.g., San Diego County Sheriff's Department, San Diego County Fire Station 47), state government uses (Caltrans Department; 40905 Old Highway 80), and vacant land (refer to [Exhibit 6](#)). Roadways in the vicinity include Jewel Valley Road, Fisher Road, Tule Jim Lane, and Old Highway 80. Based on review of available documentation noted in [Section 4.0, \*Records Review\*](#), past uses of the surrounding area appear to have consisted of ranching operations, rural residential land uses, vacant land uses, commercial uses, mining activities, transportation uses, various public service facilities, and state government uses, similar to existing conditions.

### **3.4.2 DESCRIPTION OF CURRENT USES AND STRUCTURES AT ADJOINING PROPERTIES**

Adjoining uses include ranching operations, rural residential uses, vacant land, and an SDGE facility (40709 Old Highway 80). During preliminary observation of adjoining properties from public thoroughfares, no visible or physical evidence was observed to suggest that a surface release of petroleum-based material has recently occurred on adjoining properties. No unusual or suspicious materials handling or storage practices were observed with respect to adjoining properties.

### **3.4.3 DESCRIPTION OF PAST USES AND STRUCTURES AT ADJOINING PROPERTIES**

No evidence of past uses was observed on the adjoining properties, other than a remnant railroad feature.

### **3.4.4 OBSERVATIONS OF OFF-SITE PROPERTIES**

#### **3.4.4.1 Utilities**

Typical utilities (e.g., electrical boxes, pad-mounted transformer, fire pumps etc.) were noted off-site along adjoining roadways during the site inspection. No staining or leaking was observed with respect to these off-site utilities.

#### **3.4.4.2 Chemical Storage Tanks**

One aboveground storage tank (AST) was observed to the northeast of the on-site landing strip; the AST is likely used to store water. Further, several ASTs were observed at a property (1664 Jewel Ranch Road) to the southwest of the on-site landing strip and at a property (1909 Jewel Valley Road) adjoining Area A to the northwest. The ASTs appeared to be stored properly and in good condition. No other evidence of chemical storage tanks was observed at adjoining properties during the site inspection.

#### **3.4.4.3 Hazardous Materials**

During a preliminary observation of adjoining properties from public thoroughfares, no visible or physical evidence was observed to suggest that hazardous substances and/or petroleum-based material are handled/stored/used or have been recently released into the environment on adjoining properties. No unusual or suspicious materials handling or storage practices were observed with respect to these off-site properties. Remnant ranching materials/equipment were apparent adjoining Area C to the southeast. No staining or indications of hazardous materials were observed at adjoining properties.

# SECTION 4.0

## RECORDS REVIEW

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### 4.1 PHYSICAL SETTING SOURCES

Physical setting sources typically provide information regarding geologic, hydrogeological, hydrologic, or topographic characteristics of a property. The following information is primarily based on the review of the United States Geological Survey (USGS) *Live Oak Springs Quadrangle, California – San Diego County* (dated 2021) and *Tierra del Sol Quadrangle, California – San Diego County* (dated 2021), and a site inspection conducted by Michael Baker on June 20, 2023. Other miscellaneous resources utilized within this section and throughout the Phase I ESA are referenced in [Section 8.0, \*References\*](#).

#### 4.1.1 SUBJECT PROPERTY DESCRIPTION

##### 4.1.1.1 Location

The subject property is located in the community of Boulevard, unincorporated San Diego County, California. The subject property comprises portions of APNs 612-120-01, 612-110-04 and -04, and 612-082-12 (Sections 28, 29, 32, and 33, T17S, R7E, SBBM; as well as Sections 5 and 8, T18S, R7E 36, SBBM). Specifically, the subject property encompasses seven areas (Areas A through G), generally located west of Tule Jim Lane and south of Old Highway 80. Additionally, the subject property includes a proposed gen-tie line area to the northeast of Area A (northeastern gen-tie line area), a landing strip, and a proposed turnaround at Jewel Valley Road (Jewel Valley Road turnaround). Area A is located south of Fisher Road and east and north of Jewel Valley Road, and Areas B through G are generally located south of Jewell Valley Road.

##### 4.1.1.2 Current Use(s) of the Subject Property

The subject property consists of vacant land and a private landing strip.

##### 4.1.1.3 Description of On-Site Structures and Roads

The subject property consists of vacant land, a private, unpaved landing strip, and several unpaved roads. No structures or paved roads are located on the subject property.

### 4.1.2 TOPOGRAPHY

The USGS maps show geological formations and their characteristics, describing the physical setting of an area through contour lines and major surface features including lakes, rivers, streams, buildings, landmarks, and other factors that impact the spread of contamination. Additionally, the maps depict topography through color and contour lines and are helpful in determining elevations and site latitude and longitude.

Based on the USGS *Live Oak Springs Quadrangle, California – San Diego County* (dated 2021) and *Tierra Del Sol Quadrangle, California – San Diego County* (dated 2021), the subject property consists of vacant land, unimproved roads, an intermittent stream, and a pond. Topography at the subject property ranges from approximately 3,400 to 3,680 feet above mean sea level (msl). Two hills/peaks are noted in the central portion of Area D. Topography at Areas A through C generally slopes down-gradient towards Walker Creek and Boundary Creek. Topography at Areas D through G generally slopes down-gradient towards Lake Domingo.

### 4.1.3 CURRENT USES OF ADJOINING PROPERTIES

For the scope of this Phase I ESA, properties are defined and categorized based upon their physical proximity to the subject property. An adjoining property is considered any real property or properties the border of which is contiguous or partially contiguous with that of the subject property, or that would be contiguous or partially contiguous with that of the subject property but for a street, road, or other public thoroughfare separating them. The following is a detailed description of each adjoining land use observed during the site inspection on June 20, 2023:

- North: Vacant land, rural residential uses, transportation uses (Old Highway 80, Fisher Road, other unimproved roads, and railroad tracks), and an SDGE facility are located to the north. Note, the railroad tracks to the north of Area G are no longer operational;
- East: Vacant land, transportation uses (Jewel Valley Road and unimproved roads), and rural residential uses are located to the east;
- South: Vacant land, rural residential uses, transportation uses (Jewel Valley Road and unimproved roads), and ranching operations (Empire Ranch) are located to the south; and
- West: Vacant land, transportation uses (Jewel Valley Road and unimproved roads), ranching operations (Empire Ranch), and rural residential uses are located to the west.

## 4.1.4 GEOLOGIC CONDITIONS

### 4.1.4.1 Geology

The USGS Geological Map Index was searched by EDR for available Geological Maps that cover the subject property and surrounding areas. These Geological Maps indicate geological formations that are overlaid on a topographic map. Some maps focus on specific issues (i.e., bedrock, sedimentary rocks, etc.) while others may identify artificial fills (including landfills). Geological maps can be effective in estimating permeability and other factors that influence the spread of contamination. According to the EDR GeoCheck Report, Area A consists of a stratified sequence from the Mesozoic era. Areas B through G consist of plutonic and intrusive rocks from Mesozoic era.

Based on the USGS *Preliminary Geologic Map of the El Cajon 30' X 60' Quadrangle, Southern California*, dated 2004, the subject property is underlain by tonalite of La Posta (early and late Cretaceous; Klp). Tonalite of La Posta is described as “Hornblende-biotite trondhjemite in western part, and biotite trondhjemite and granodiorite in the eastern part.” The unit is described as leucocratic, homogeneous, largely undeformed, and inclusion-free, but locally, pluton margins are moderately to strongly foliated.

### 4.1.4.2 Soils

According to a *Preliminary Geotechnical Site Evaluation Report* prepared for the subject property (Bruin Geotechnical Services, Inc. 2022), native alluvial materials were encountered within 31 exploratory trenches advanced to a maximum depth of 15 feet below ground surface (bgs) at the subject property (Note: the presence of bedrock material resulted in refusals at several trench locations. As such, several excavations were terminated, and 14 feet bgs was the maximum explored depth). Soils encountered generally consisted of poorly graded sands with occasional silty sand. Subsurface materials were described as dry to slightly moist (Bruin Geotechnical Services, Inc. 2022).

The U.S. Department of Agriculture (USDA) Soil Conservation Service (SCS) Soil Survey Maps were searched for available soils within the subject property. Multiple soil types with multiple phases are located within the boundaries of the subject property; refer to [Appendix B](#), for a mapping of on-site soils. The following is a detailed description of each soil type that compose the subject property:

## Area A Soils

- La Posta loamy coarse sand, 5 to 30 percent slopes, eroded (LaE2): La Posta loamy coarse sand, 5 to 30 percent slopes, eroded, consists of somewhat excessively drained soils with a very low runoff class. The landform setting for this type of soil is mountains, and the parent material is residuum weathered from granodiorite. There is a very low available water supply in the profile, about 1.8 inches.
- La Posta loamy coarse sand, 5 to 30 percent slopes, severely eroded (LaE3): La Posta loamy coarse sand, 5 to 30 percent slopes, severely eroded consists of somewhat excessively drained soils with a very low runoff class. The landform setting for this type of soil is mountains, and the parent material is residuum weathered from granodiorite. There is a very low available water supply in the profile, about 1.7 inches.
- La Posta rocky loamy coarse sand, 5 to 30 percent slopes, eroded (LcE2): La Posta rocky loamy coarse sand, 5 to 30 percent slopes, eroded consists of somewhat excessively drained soils with a very low runoff class. The landform setting for this type of soil is mountains, and the parent material is residuum weathered from granodiorite. There is a very low available water supply in the profile, approximately 1.7 inches.

## Northeastern Gen-Tie Line Area Soils

- Mottsville loamy coarse sand, 2 to 9 percent slopes (MvC): Mottsville loamy coarse sand, 2 to 9 percent slopes consists of excessively drained soils with a very low runoff class. The landform setting for this type of soil is alluvial fans, and the parent material is alluvium derived from granite. There is a low available water supply, approximately 4.2 inches.

## Area B and On-site Landing Strip Soils

Two soil phases are located within the boundaries of the Area B and the on-site landing strip: La Posta rocky loamy coarse sand, 5 to 30 percent slopes, eroded; and Mottsville loamy coarse sand, 2 to 9 percent slopes. Descriptions of the soil phases are provided under Area A Soils and Northeastern Gen-Tie Line Area Soils above.

## Area C Soils

Two soil phases are located within the boundaries of Area C: Mottsville loamy coarse sand, 2 to 9 percent slopes (refer to Northeastern Gen-Tie Line Area Soils, above, for a description); and

Tollhouse coarse sandy loam, 5 to 35 percent slopes, eroded, very stony, which is described as follows:

- Tollhouse coarse sandy loam, 5 to 35 percent slopes, eroded, very stony (ToE2): Tollhouse coarse sandy loam, 5 to 35 percent slopes, eroded, very stony consists of somewhat excessively drained soils with a very high runoff class. The landform setting for this type of soil is mountain slopes, and the parent material is colluvium derived from quartz-diorite. There is a very low water supply in the profile, approximately 1.5 inches.

### **Area D Soils**

Two soil phases are located within the boundaries of Area D: La Posta loamy coarse sand, 5 to 30 percent slopes, eroded; and La Posta rocky loamy coarse sand, 5 to 30 percent slopes, eroded. Descriptions of the soil phases are provided under Area A Soils above.

### **Area E Soils**

Two soil phases are located within the boundaries of Area E: La Posta rocky loamy coarse sand, 5 to 30 percent slopes, eroded; and Tollhouse coarse sandy loam, 5 to 35 percent slopes, eroded, very stony. Descriptions of the soil phases are provided under Area A Soils and Area C Soils above.

### **Area F Soils**

Three soil phases are located within the boundaries of Area F: La Posta rocky loamy coarse sand, 5 to 30 percent slopes, eroded; Tollhouse coarse sandy loam, 5 to 35 percent slopes, eroded, very stony; and La Posta loamy coarse sand, 5 to 30 percent slopes, eroded. Descriptions of the soil phases are provided under Area A Soils and Area C Soils above.

### **Area G Soils**

Three soil phases are located within the boundaries of the Area G: Mottsville loamy coarse sand, 20 to 9 percent slopes; La Posta loamy coarse sand, 5 to 30 percent slopes, eroded; and La Posta rocky loamy coarse sand, 5 to 30 percent slopes, eroded. Descriptions of the soil phases are provided under Area A Soils and Northeastern Gen-Tie Line Area Soils above.

#### **4.1.4.3 Radon**

Radon is a radioactive gas that is found in certain geologic environments and is formed by the natural breakdown of radium, which is found in the earth's crust. Radon is an invisible, odorless,

inert gas that emits alpha particles, known to cause lung cancer. Radon levels are highest in basements (areas in close proximity to the soil) that are poorly ventilated. A radon survey was not included within the scope of this investigation. According to the “U.S. EPA Map of Radon Zones,” the County of San Diego is located within Zone 3, which has a predicted average indoor screening level below 2 picocuries per liter (pCi/L). EPA recommends remedial actions when radon levels are greater than 4.0 pCi/L.

#### **4.1.5 BIOLOGICAL SETTING**

Based on the *San Diego County General Plan Update Final Environmental Impact Report* (dated August 2011), the community of Boulevard is dominated by chaparral. Other vegetation communities in the general area include desert chaparral, coastal sage scrub, and marsh.

#### **4.1.6 DRAINAGE/HYDROLOGY**

Groundwater is anticipated to be approximately 25 feet bgs at the subject property. Due to groundwater pumping and the scarcity of groundwater in the vicinity of the subject property, groundwater levels are anticipated to fluctuate drastically (Bruin Geotechnical Services, Inc. 2022).

##### **4.1.6.1 Area A and Northeastern Gen-Tie Line**

Drainage of the subject property is accomplished by overland sheet flow, which flows in varying directions across Area A and the northeastern gen-tie line area based on on-site topography.

Michael Baker assumes groundwater flow would follow the slope of the ground surface elevations towards the nearest open body of water or intermittent stream. The direction of flow underlying Area A and the northeastern gen-tie line area is expected to be variable. Groundwater in the northern half of Area A and the northeastern gen-tie line area is expected to flow generally in the northeastern direction towards Walker Creek. Groundwater in the southern half of Area A is expected to flow south/southwest towards Boundary Creek.

##### **4.1.6.2 Area B and On-site Landing Strip**

Drainage of Area B and the landing strip is accomplished by overland sheet flow, which flows in an eastern and southeastern direction across these portions of the subject property.

The direction of flow underlying Area B and the landing strip is expected to be generally in an eastern/southeastern direction, flowing towards Boundary Creek.

**4.1.6.3 Area C**

Drainage of the Area C is accomplished by overland sheet flow, which flows in an eastern direction across Area C.

The direction of flow underlying Area C is expected to be generally in an eastern direction, flowing towards Boundary Creek, which flows further to the southeast and south.

**4.1.6.4 Area D**

Drainage of the Area D is accomplished by overland sheet flow, which flows in varying directions across Area D based on on-site topography.

The direction of flow underlying Area D is expected to be generally in an eastern and southeastern direction, ultimately flowing towards Lake Domingo.

**4.1.6.5 Area E**

Drainage of Area E is accomplished by overland sheet flow, which flows in southern and southwestern directions across Area E.

The direction of flow underlying Area E is expected to be generally in a southeastern direction, flowing towards Lake Domingo.

**4.1.6.6 Area F**

Drainage of Area F is accomplished by overland sheet flow, which flows in eastern and southeastern directions across Area F.

The direction of flow underlying Area F is expected to be generally in a southeastern direction, flowing towards Lake Domingo.

**4.1.6.7 Area G**

Drainage of Area G is accomplished by overland sheet flow, which flows in varying directions across Area G based on on-site topography. It is noted that ponding was observed near the southwestern portion of Area G.

The direction of flow underlying Area G is expected to be generally in a southeastern direction, flowing towards Lake Domingo.

### 4.1.7 Flood Hazards

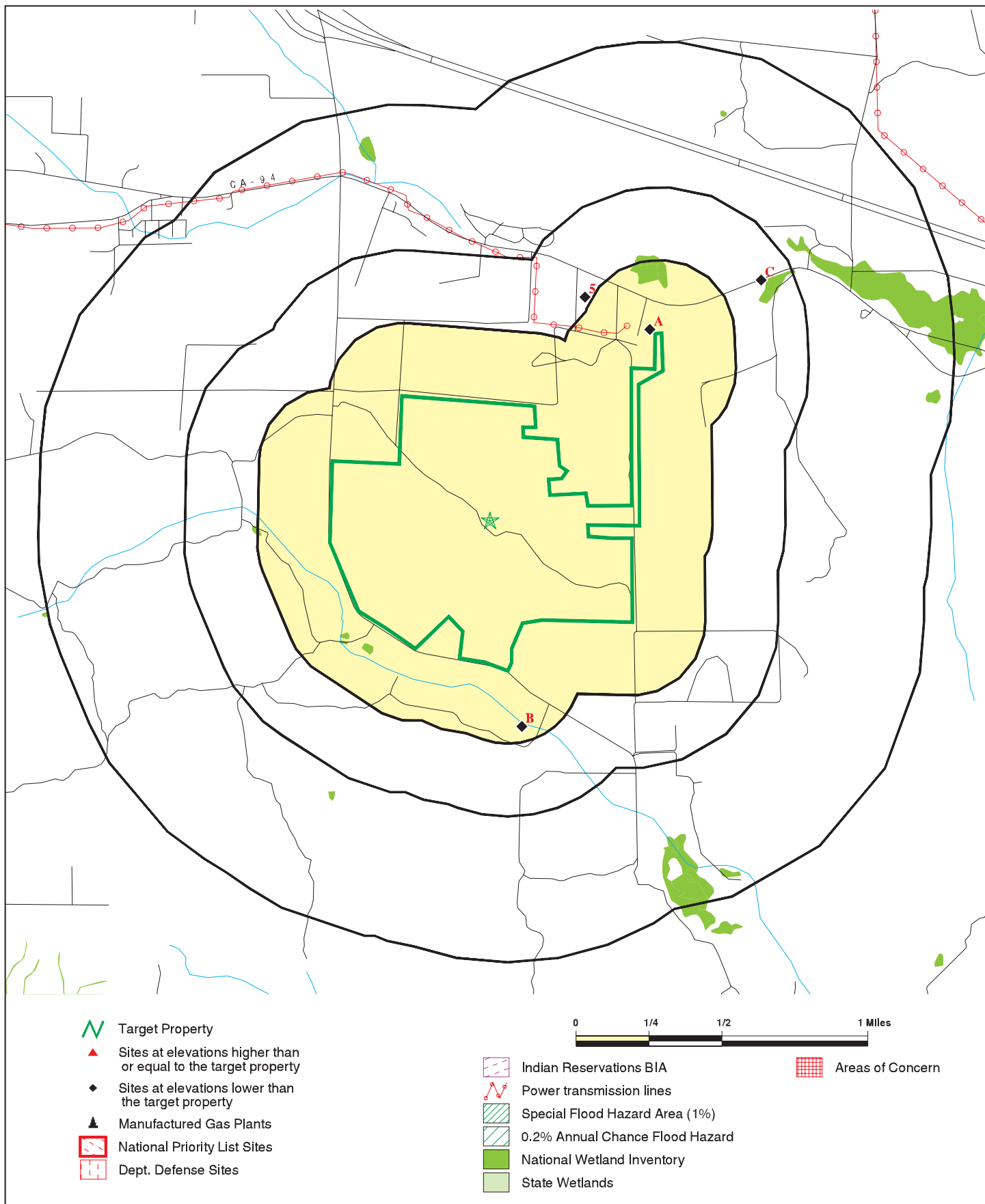
Flood Prone Area Maps published by the USGS show areas prone to 100-year floods overlaid on a topographical map. These maps are not considered the official Federal Emergency Management Agency (FEMA) flood maps; therefore, in cases where a property is located immediately adjacent to or within the flood prone boundary, a FEMA map should be obtained. According to the FEMA National Flood Hazard Layer (NFHL) Viewer, the subject property is classified as Zone D, which indicates areas of undetermined flood hazard.

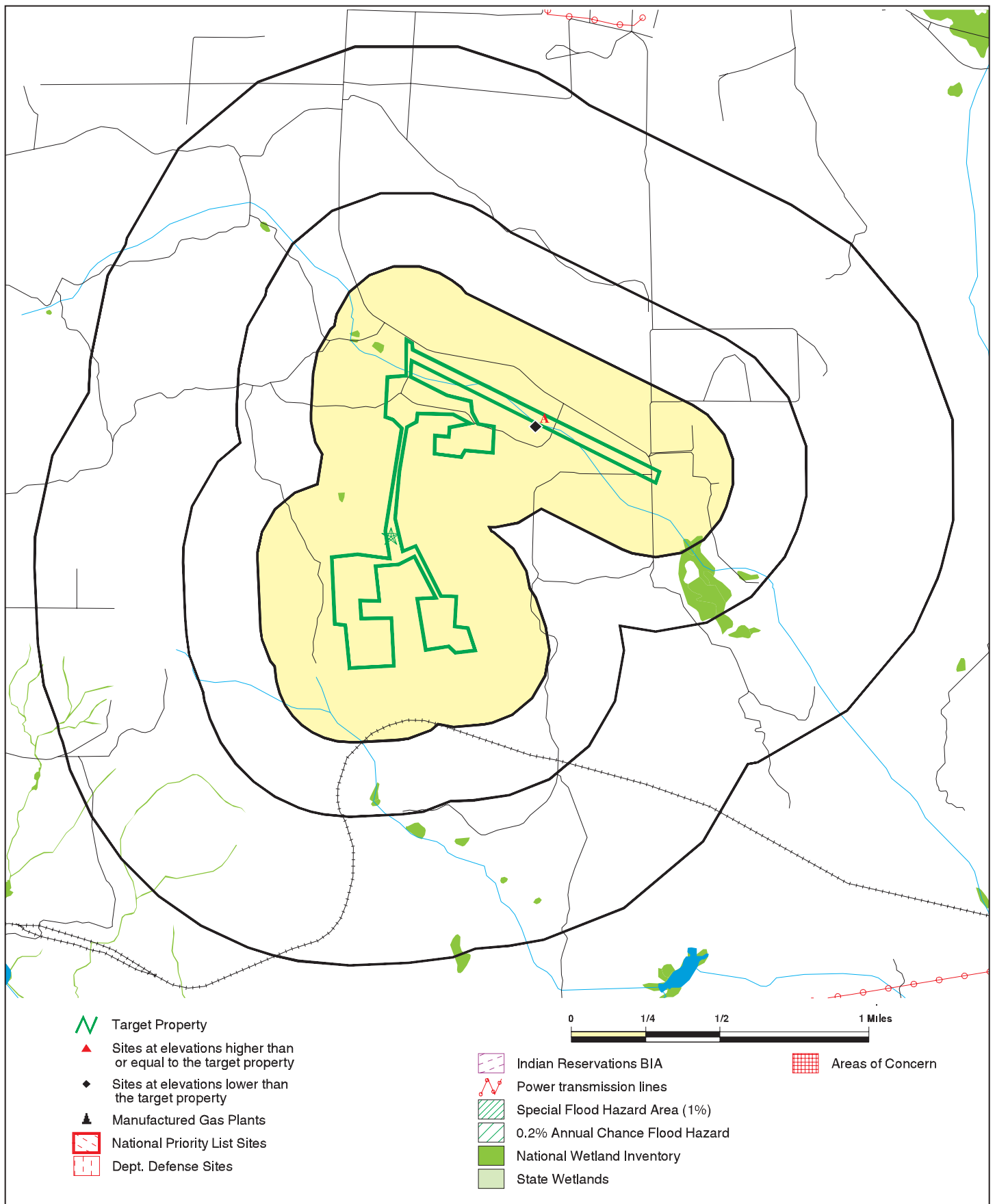
## 4.2 STANDARD ENVIRONMENTAL RECORDS SOURCES

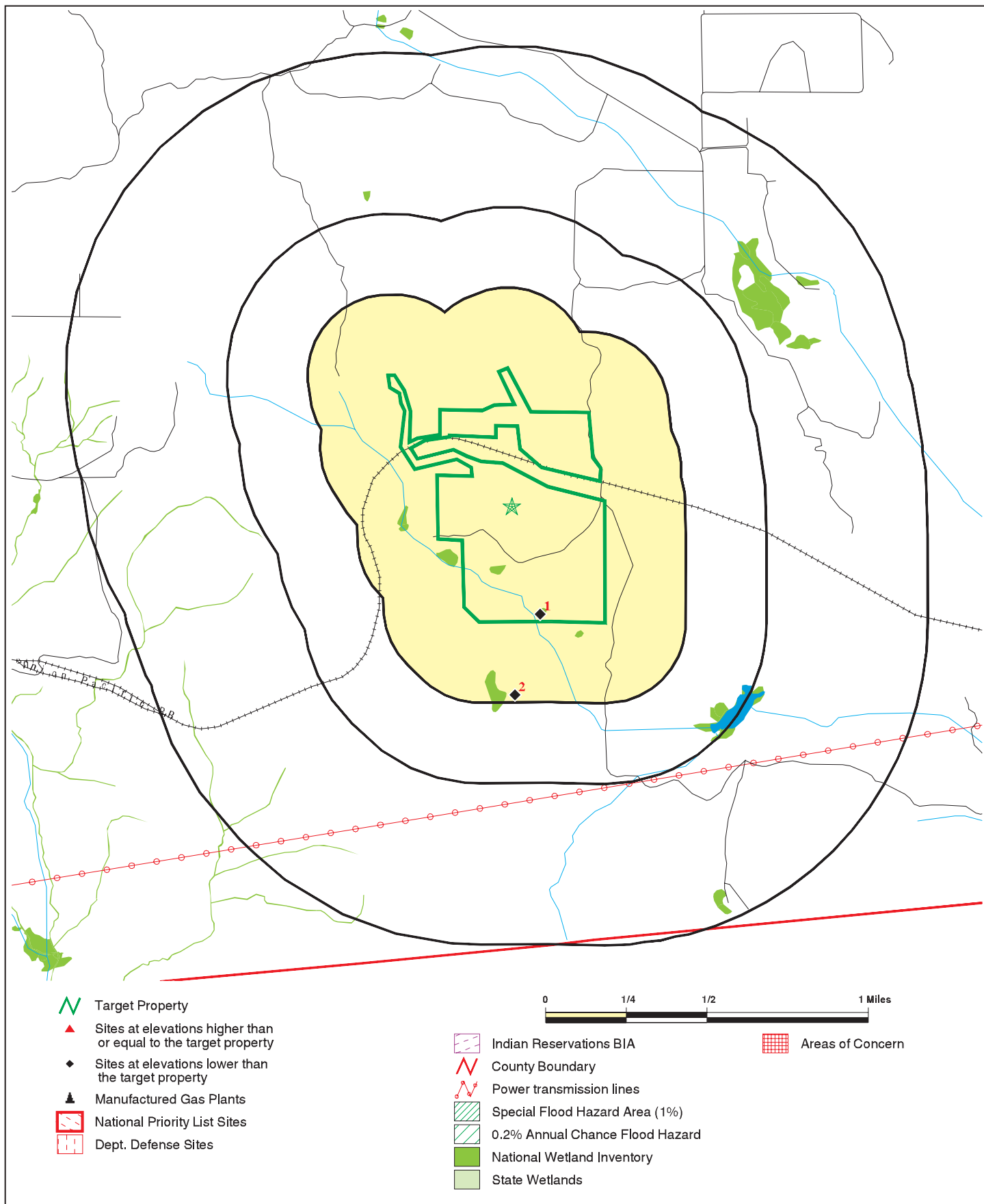
The governmental sources have been searched by EDR (at the request of Michael Baker) for sites within the subject property and within an approximate one-mile radius of the subject property boundaries. Upon completion of their search, EDR provided Michael Baker with their findings dated June 9 and June 12, 2023. Michael Baker makes no claims as to the completeness or accuracy of the referenced sources. Our review of EDR's findings can only be as current as their listings and may not represent all known or potential hazardous waste or contaminated sites. To reduce the potential for omitting possible hazardous material sites on the subject property and within the surrounding area, sites may be listed in this report if there is any doubt as to the location because of discrepancies in map location, zip code, address, or other information. Refer to Appendix C, Database Records Search, for a listing and description of the Federal, tribal, State, and local records searched.

### 4.2.1 SUBJECT PROPERTY

The subject property (Area G) was listed in one database associated with mining activities (refer to Exhibit 7a through 7b, Overview Map); refer to Appendix C. Based on the EDR database search, the Risley Burroughs Deposit operated at Area G and was associated with the mining of quartz and silica in 1982 and 1991, respectively.







**Table 4-1**  
**Database Summaries**

Database	Description
MINES MRDS	The USGS Mineral Resources Data System (MRDS) is a collection of reports describing metallic and nonmetallic resources throughout the world. Included are deposit name, location, commodity, deposit description, geologic characteristics, production, reserves, resources, and references.
RCRA NonGen/NLR	RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by RCRA. Non-Generators do not presently generate hazardous waste. No longer regulated.
RCRA-LQG	The RCRA – Large Quantity Generator (LQG) database contains selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by RCRA. Large quantity generators generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

EDR Map ID#	Site Name/Address	Direction from Subject Property	Regulatory Database <sup>1</sup>	EDR Site Status	File Review <sup>2</sup>
1, 2 <sup>3</sup>	Risley Burroughs Deposit/Risley Deposit (32.61951, -116.28139)	On-Site - Southern Portion of Area G	MINES MRDS	The facility is listed in the Mineral Resources Data System database. Primary commodities reported include quartz and silica. Mining activities were reported in 1982 and 1991.	<b>NO</b> The County of San Diego Department of Environmental Health and Quality, Hazardous Materials Division, indicated no records are available for the requested address.
A1, A2 <sup>4</sup>	San Diego Gas and Electric 40749 Old Highway 80	Adjoining - Northwest of Northern Gen-Tie Line Area	RCRA NonGen/NLR	The facility was reported as a non-generator of hazardous waste in April 2013. No violations were reported.	<b>YES</b> Available files maintained by the County of San Diego Department of Environmental Health and Quality, Hazardous Materials Division were reviewed.
			RCRA-LQG	The facility was reported as a large quantity generator of hazardous waste in May 2014. No violations were reported.	
B3, B4 <sup>5</sup> ; A1, A2 <sup>6</sup>	Walker Deposit (32.64177, -116.27943)	Adjoining - South of On-Site Landing Strip	MINES MRDS	The facility is listed in the Mineral Resources Data System database. Primary commodities reported include quartz, and tertiary commodities reported include silica. Mining activities were reported in 1976 and 1991.	<b>NO</b> No file review is required, as this adjoining property is not listed in a mandatory database for file review.

EDR Map ID#	Site Name/Address	Direction from Subject Property	Regulatory Database <sup>1</sup>	EDR Site Status	File Review <sup>2</sup>
<p>Notes:</p> <ol style="list-style-type: none"> <li>1. Refer to <a href="#">Section 4.3, File Record Reviews</a>, for a discussion of files reviewed, if applicable.</li> <li>2. <b>BOLD</b> indicates ASTM Standard Practice E 1527-21, Section 8.2.1, standard federal, state, and tribal environmental records sources that should include a file review.</li> <li>3. Refer to EDR report prepared for Areas F and G.</li> <li>4. Refer to EDR report prepared for Area A.</li> <li>5. Refer to EDR report prepared for Area A.</li> <li>6. Refer to EDR report prepared for Areas B through E.</li> </ol> <p>Source: Environmental Data Resources, Inc., <i>EDR Radius Map with GeoCheck, Starlight Solar – Area A</i>, dated June 9, 2023; Environmental Data Resources, Inc., <i>EDR Radius Map with GeoCheck, Starlight Solar – Areas B through E</i>, dated June 12, 2023; Environmental Data Resources, Inc., <i>EDR Radius Map with GeoCheck, Starlight Solar – Areas F and G</i>, dated June 12, 2023; refer to <a href="#">Appendix C, Database Records Searches</a>.</p>					

## 4.2.2 OFF-SITE PROPERTIES

The lists identified four off-site regulatory properties within a one-mile radius of the subject property. For a complete list of site(s) identified, refer to [Appendix C](#). The following is a discussion of reported off-site properties.

### Adjoining Properties

The lists that were reviewed reported two regulatory properties adjoining the subject property (refer to [Exhibit 7](#) and [Table 4-2](#)). No known corrective action, restoration, or remediation has been planned, is currently taking place, or has been completed on properties adjoining the subject property. Properties adjoining the subject property have not been under investigation for violation of any environmental laws, regulations, or standards, as identified in the databases reported by EDR (refer to [Appendix C](#)).

### Adjacent Properties

Although two adjacent properties were listed, no reported adjacent regulatory properties have been identified that also present a potential concern to soil gas and/or groundwater underlying the subject property. Reported adjacent regulatory properties are considered to have a low potential of affecting the subject property for one or more of the following reasons: distance from the subject property, direction of anticipated groundwater flow, site status, and/or no contamination has been reported. Refer to [Appendix C](#) for a listing of all adjacent properties noted.

### 4.2.3 UNMAPPED PROPERTIES

According to EDR's ESA Report Desktop Reference, dated 1996, some reported sites are unmappable as exact locations remain undefined. Listings in publicly available records, which do not have adequate address information, are generally not considered practically reviewable. For the purposes of this Phase I ESA, practically reviewable information is defined as information provided in a manner and in a form that yields information without the need for extraordinary analysis or irrelevant data. Although the location of these sites may be unknown, the site and detail information are often available through the EDR.

EDR did not report any Unmapped Properties located within the boundaries of the subject property or within the vicinity of the subject property (refer to [Appendix C](#)).

## 4.3 FILE RECORD REVIEWS

If the subject property or any of the adjoining properties are identified on one or more of the standard environmental record sources, pertinent regulatory files and/or records associated with the listing should be reviewed. The purpose of the regulatory file review is to obtain sufficient information to assist the environmental professional in determining if a REC, HREC, CREC, or a *de minimis* condition exists at the property in connection with the listing. If, in the environmental professional's opinion, such a review is not warranted, the environmental professional must explain the justification for not conducting the regulatory file review.

Michael Baker requested public records for the following reported properties:

- **APN 659-080-02:** According to the EDR database report, the southern portion of Area G is listed in the MINES MRDS, which indicates mining activities were reported in 1982 and 1991. Records were requested from the County of San Diego Department of Environmental Health and Quality (DEHQ), Hazardous Materials Division (HMD), on June 13, 2023. On June 15, 2023, HMD indicated no records are available for the requested address.
- **40749 Old Highway 80 (San Diego Gas and Electric):** This facility was reported adjoining the northeastern gen-tie line area to the northwest and is listed in the RCRA NonGen/NLR and RCRA-LQG databases. According to the RCRA-LQG database, the facility was reported as a large quantity generator of hazardous waste in May 2014. No violations were reported. Records were requested from the County of San Diego DEHQ,

HMD, on June 22, 2023. On June 27, 2023, HMD provided records for the facility, which are summarized in Section 4.3.1, *File Reviews Conducted*, below.

### **4.3.1 File Reviews Conducted**

Michael Baker reviewed records maintained at the County of San Diego DEHQ, HMD. The following is a discussion of Michael Baker's online file review conducted.

#### **4.3.1.1 San Diego Gas and Electric (40749 Old Highway 80)**

This site adjoins the northeastern gen-tie line area to the northwest. The records received from HMD include several Annual Carcinogen and Reproductive Toxin Reporting Lists prepared for the SDGE facility from 2014 to 2019, which indicate the facility maintained vacuum pump fluid; "imbiber beads absorbent product;" "lead acid battery wet, filled with acid;" electro-contact cleaner; silica sands and gravel; lead and lead compounds; arsenic; and strong inorganic acid mists containing sulfuric acid. According to a March 16, 2023 Compliance Inspection Report, the facility stores electrolytic batteries, dielectric mineral oil, sulfur hexafluoride, and nitrogen gas. No violations were reported during routine compliance evaluation inspections conducted in May 2017, September 2019, and March 2023. No releases have been reported.

## **4.4 HISTORICAL USE INFORMATION ON THE SUBJECT PROPERTY AND ADJOINING PROPERTIES**

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 of past uses having led to RECs in connection with the property. The Environmental Professional shall exercise professional judgment and consider the possible releases that might have occurred at a property in light of the historical uses and, in concert with other relevant information gathered as part of the Phase I ESA process, use this information to assist in identifying RECs (discussed in Section 6.0, *Findings and Opinions*, of this Phase I ESA).

The standard sources identified by ASTM E 1527-21 include aerial photographs, fire insurance maps, property tax files, recorded land title records (a chain-of-title), historical USGS topographic maps, local street directories, building department records, zoning/land use records, prior assessments, and other historical sources (i.e., any source or sources, other than those listed, that are credible to a reasonable person and that identify past uses of the property). The focus is on usage rather than ownership, which is why a chain-of-title is not sufficient by itself.

## **4.4.1 METHODOLOGY AND LIMITING CONDITIONS**

### **4.4.1.1 Methodology**

Data failure (a subset of a data gap) occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the historical source review objectives have not been met.

### **USES OF THE PROPERTY**

Per ASTM E 1527-21 Standard Practice, historical uses “shall be identified from the present, back to the property’s obvious first development use including (agricultural and fill activities), or back to 1940, whichever is earlier.” This task requires reviewing only as many of the standard historical sources as are necessary and both reasonably ascertainable and likely to be useful. Sources reviewed have been cited throughout this section and are referenced in Section 8.0, References, of this Phase I ESA.

### **INTERVALS**

Review of standard historical sources at less than approximately five-year intervals is not required by ASTM E 1527-21 Standard Practice. If the specific use of the property appears unchanged over a period longer than five years, then it is not required by ASTM E 1527-21 Standard Practice to research the use during that period. Michael Baker did not encounter data failure with regard to source intervals during the course of this Phase I ESA.

### **USES OF PROPERTIES IN SURROUNDING AREA**

Uses in the area surrounding the property shall be identified in the Phase I ESA, but this task is only required to the extent that this information is revealed in the course of researching the property itself. If the environmental professional uses sources that include the surrounding area, surrounding uses should be identified to a distance determined at the discretion of the environmental professional. Factors to consider in making this determination include, but are not limited to:

- The extent to which information is reasonably ascertainable;
- The time and cost involved in reviewing surrounding uses;
- The extent to which information is useful, accurate, and complete in light of the purpose of the records review;
- The likelihood of the information being significant to RECs in connection with the property;

- The extent to which potential concerns are obvious;
- Known hydrogeologic/geologic conditions that may indicate a high probability of hazardous substances or petroleum products migration to the property;
- How recently local development has taken place;
- Information obtained from interviews and other sources; and
- Local good commercial and customary practice.

Surrounding land uses have been noted throughout the Phase I ESA, as applicable, and are referenced accordingly.

#### **4.4.1.2 Limiting Conditions**

Michael Baker did not encounter any other conditions that limited the historical use review during the course of this Phase I ESA.

### **4.4.2 STANDARD HISTORICAL SOURCES**

The subject property has historically consisted of vacant land, ranching/grazing land, unimproved roads, intermittent streams, and ponds. Additionally, a railroad track has been present at the subject property since at least 1939. Adjoining land uses have historically consisted of vacant land, unimproved and light duty roads, railroad tracks, rural residential uses, an SDGE facility, and ranching operations. Rural residential uses were apparent in the surrounding area since at least 1939, and increased residential development in the general vicinity was apparent through present day. Additionally, indications of mining activities adjoining various locations of the subject property were apparent beginning in 1975. Land further to the north along Old Highway 80 appeared to have been developed by 1939 and has been further developed with various commercial businesses, state government buildings, and public service facilities over the years.

The following describes the specific site history per each Area on-site.

#### **4.4.2.1 Area A and Northeastern Gen-Tie Lines Historical Uses Summary**

Based upon the evaluation of documented land use as demonstrated in the resources reviewed as part of this Phase I ESA, Area A and the northeastern gen-tie line area have consisted of vacant land from at least 1939 to present day. Unimproved roads were present on Area A and the northern gen-tie line area by 1953. Area A and the northern gen-tie line area have historically been surrounded by rural residential uses, transportation uses, vacant land, ranching operations, various commercial businesses, public service facilities, and state government uses. Two

quarries/open mines were depicted to the northeast and east from approximately 1939 to 1991. The northwestern-adjoining SDGE facility was developed by 2016. Development of the landing strip appeared to have begun by 1994, and the landing strip appeared to be in its current configuration by 2005. Refer to [Table 4-2, Area A and Northeastern Gen-Tie Line Area Historical Uses Summary](#).

**Table 4-3**  
**Area A and Northeastern Gen-Tie Line Area Historical Uses Summary**

Year	On-Site Use	Surrounding Uses	Source
1939, 1942	Area A and the northern gen-tie line area consist of vacant land and an intermittent stream.	Vacant land adjoins Area A and the northeastern gen-tie line area to the north, east, and south. An unimproved road adjoins Area A to the east, and a light-duty road, followed by scattered buildings, adjoin Area A to the west and south. Surrounding land uses generally include vacant land, unimproved and light-duty roads, intermittent streams (including Boundary Creek to the south), and scattered buildings. Old Highway 80 is classified as a highway further to the north. Quarries/open pit mines are noted further to the northeast and east.	USGS Topographic Maps
1953	No changes noted.	A light-duty road adjoins Area A to the south and west. Surrounding land uses include vacant land, rural residential buildings, and unimproved and light-duty roads. A stream is noted to the southwest and south. A small agricultural operation and ancillary structures are noted further to the southeast.	Aerial Photographs
1959	Area A and the northern gen-tie line area consist of vacant land and an unimproved road. An intermittent is not depicted on Area A.	The light-duty road adjoining Area A to the south and west is labeled as Jewel Valley Road. Buildings adjoining Area A to the west and south appear to have been removed. Several water wells are depicted in the general area. A post office is noted to the north, just south of Old Highway 80. Callexico Lodge is noted to the north across Old Highway 80, and Clover Flat School is depicted to the northwest across the highway. California State Route (SR) 94 is classified as a secondary highway to the northwest.	USGS Topographic Maps
1971	Not listed.	Listings along Old Highway 80 include residential uses, commercial businesses, an elementary school, a gasoline station, a courthouse, and a police station (no addresses provided). Listings along Jewel Valley Road include residential uses (no addresses provided).	City Directories

Year	On-Site Use	Surrounding Uses	Source
1975	No changes noted.	An additional unimproved road adjoins the northern gen-tie line area to the west. A pond is noted further to the southwest. A portion of a hill further to the south appears to have been disturbed/cleared of vegetation. Additional rural residential development is noted to the south. An additional segment of SR 94 has been constructed to the north. Old Highway 80 is classified as a secondary highway, and a new highway is noted to the north. Listings along Old Highway 80 include residential uses, commercial businesses, an elementary school, a ranch, a courthouse, a sheriff department, and a California Department of Transportation (Caltrans) maintenance facility (no addresses provided).	USGS Topographic Maps, Aerial Photographs, City Directories
1979	No changes noted.	Listings along Old Highway 80 include residential uses, County of San Diego Sheriff Blvd, Wisteria Candy Cottage, and commercial businesses (no addresses provided).	City Directories
1982	No changes noted.	A residential property (1758 Jewel Valley Road) adjoins Area A to the southwest. Adjacent listings along Jewel Valley Road include residential uses and Frank Thng. Pmp. Srv. (39560 Jewel Valley Road). Adjacent listings along Old Highway 80 include residential uses. Additional listings include commercial businesses, 6Kinner J L & Sons, a Caltrans maintenance facility, and Wisteria Candy Cottage (no addresses provided).	City Directories
1984	An additional unimproved road is noted near the southwestern portion of Area A.	Several ranching buildings and ancillary structures have been constructed and adjoin Area A to the southwest across Jewel Valley Road. Additional buildings are noted further to the south of Jewell Valley Road. Additional rural residential development has occurred in the general vicinity.	Aerial Photographs
1986	No changes noted.	A residential property (1633 Jewel Valley Road) adjoins Area A to the southeast. Adjacent listings along Old Highway 80 include residential uses. Additional listings along Old Highway 80 include commercial businesses, a Caltrans maintenance facility, West End Automotive, and Wisteria Candy Cottage (no addresses provided). Adjacent listings along Jewel Valley Road include residential uses.	City Directories

Year	On-Site Use	Surrounding Uses	Source
1989	An additional unimproved road is noted near the northern portion of Area A.	Additional buildings/structures are noted at the southwestern-adjointing property. A western-adjointing property appears to have been graded and developed with a residential building and several ancillary structures. Additional rural residential development has occurred to further to the southeast.	Aerial Photographs
1991	No changes noted.	Quarries/open pit mines are no longer depicted to the northeast and east. Several additional buildings are noted further to the south.	USGS Topographic Maps
1992	No changes noted.	Adjacent listings along Old Highway 80 include Boulevard Junction (40601 Old Highway 80) and High Desert Salon/Mooney's Pump Serv. (41148 Old Highway 80).	City Directories
1994	No changes noted.	Buildings associated with farming operations are noted adjoining Area A to the north. Land further to the south appears to have been graded, and development of the landing strip appears to have begun.	Aerial Photographs
1995	No changes noted.	Adjacent listings along Old Highway 80 include residential uses and High Desert Salon/Mooney's Pump Serv. (41148 Old Highway 80).	City Directories
1996	No changes noted.	Additional development of the landing strip has occurred.	Aerial Photographs
1997	No changes noted.	No changes noted.	USGS Topographic Maps
2000	No changes noted.	Adjacent listings along Old Highway 80 include residential uses.	City Directories
2002	No changes noted.	An additional rural residential property adjoins Area A to the north.	Aerial Photographs
2005	No changes noted.	The landing strip to the south appears to be fully developed in its current configuration. Additional grading and development of the western-adjointing residential property (listed at 1909, 1926, and 1931 Jewel Valley Road) has occurred. A residential property (2052 Flying Cloud Place) adjoins Area A to the north. Adjacent listings along Old Highway 80 include residential uses and Chef's Hat Grill/Hat Chef Grill (40601 Old Highway 80).	Aerial Photographs, City Directories
2009	No changes noted.	A building appears to have been removed from a northern-adjointing property.	Aerial Photographs
2010	No changes noted.	Adjacent listings along Old Highway 80 include residential uses and a Caltrans facility (40945 Old Highway 80).	City Directories

Year	On-Site Use	Surrounding Uses	Source
2012	No changes noted.	A fire station is depicted to the northwest across Old Highway 80.	USGS Topographic Maps, Aerial Photographs
2014	No changes noted.	Adjacent listings along Old Highway 80 include residential uses.	City Directories
2015	No changes noted.	No buildings are depicted on the topographic map.	USGS Topographic Maps
2016	No changes noted.	The SDGE facility has been developed and adjoins the northeastern gen-tie lines to the northwest.	Aerial Photographs
2017	No changes noted.	No changes noted.	City Directories
2018	No changes noted.	No buildings are depicted on the topographic map.	USGS Topographic Maps
2020	No changes noted.	An additional building from a northern-adjointing property appears to have been removed.	Aerial Photographs, City Directories

#### 4.4.2.2 Area B and Current Landing Strip Area Historical Uses Summary

Based upon the evaluation of documented land use as demonstrated in the resources reviewed as part of this Phase I ESA, Area B may have been used for grazing since at least 1975 and appears to have been used for ranching/grazing purposes from approximately 1989 to at least 2020. A portion of a detention basin was apparent in the southern portion of Area B from at least 1989 until sometime prior to 2002. Unimproved roads were present on Area B since at least 1953. Development of the landing strip appeared to have begun by 1994 and was completed by 2005. Two water wells were present on the landing strip area from at least 1959 to 2018. An on-site portion of land within the Jewel Valley Road right-of-way has consisted of an unimproved road from at least 1939 to present day. Area B, the landing strip area, and the on-site portion of land within the Jewel Valley Road right-of-way have historically been surrounded by vacant land uses, transportation uses, rural residential uses, and ranching operations. The San Diego and Imperial Valley Railroad (formerly San Diego and Arizona Eastern Railway) was present to the south by 1939. Refer to Table 4-3, Area B, Landing Strip, and Jewel Valley Right-of-Way Historical Uses Summary.

**Table 4-4**  
**Area B, Landing Strip, and Jewel Valley Right-of-Way Historical Uses Summary**

Year	On-Site Use	Surrounding Uses	Source
1939, 1942	Area B consists of vacant land. The current landing strip area consists of vacant land, a building, unimproved roads, and an intermittent stream. The on-site portion of land within the Jewel Valley Road right-of-way consists of vacant land.	Vacant land adjoins Area B to the north, east, south, and west. The surrounding area consists of vacant land, light duty and unimproved roads, intermittent streams (including Boundary Creek), and scattered buildings, primarily to the east and southeast. The San Diego and Arizona Eastern Railway, Hipass	USGS Topographic Maps

Year	On-Site Use	Surrounding Uses	Source
		Station, and Lake Domingo are located further to the south.	
1953	Area B consists of vacant land and unimproved roads. The current landing strip area consists of vacant land, a stream, and unimproved roads. The on-site portion of land within the Jewel Valley Road right-of-way consists of vacant land.	The surrounding area consists of vacant land, light duty and unimproved roads, streams, and several rural residential buildings. A pond is noted further to the west/northwest, and a railroad track is noted to the south.	Aerial Photograph
1959	A pond, an unimproved road, and two water wells are noted in Area B.	Adjoining and surrounding land uses appear similar to those depicted in the 1942 topographic map. Jewel Valley Road is labeled as a light duty road to the north. Additional unimproved roads and buildings as well as ponds and water wells are depicted in the general vicinity.	USGS Topographic Maps
1971	Not listed.	Listings along Jewel Valley Road include residential uses (no addresses provided).	City Directories
1975	Portions of vegetation on Area B and the current landing strip appear to have been cleared.	Adjoining and surrounding land uses appear similar to those depicted in the 1959 topographic map. A portion of a hill further to the southeast of Area B appears to have been disturbed/cleared of vegetation. Additional rural residential development is noted to the southeast. Note, the southern portion of the topographic map is not depicted.	USGS Topographic Maps, Aerial Photograph, City Directories
1979, 1982	No changes noted.	A rural residential property (1758 Jewel Valley Road) adjoins area B to the west. Adjacent listings along Jewel Valley Road include residential uses.	City Directories
1984	Additional unimproved roads are depicted on Area B.	Several buildings adjoining the current landing strip area to the south appear to have been removed, and new buildings appear to have been constructed. A property adjoining to the northwest of Area B appears to be developed with ranching buildings and ancillary structures. A few small structures are noted to the south of the hill further to the southeast of Area B. Additional rural residential development is noted further to the northeast and south.	Aerial Photographs
1986	No changes noted.	No changes noted.	City Directories
1989	Area B may be used for ranching/grazing purposes. A small structure is noted near the eastern portion of Area B, fencing is noted in the northwestern portion, and a portion of a detention basin is noted in the southern portion. A portion of the current landing	Adjoining and surrounding land uses appear generally similar to those depicted in the 1984 aerial photograph. A detention basin adjoins Area B to the south. Several structures/storage containers adjoin Area B to the northwest.	Aerial Photographs

Year	On-Site Use	Surrounding Uses	Source
	strip area appears to have been graded.		
1991	Area B consists of vacant land, an unimproved road, and an intermittent stream. The current landing strip area consists of vacant land, an unimproved road, intermittent streams, and a pond.	A building is noted adjoining Area B to the south. Several additional buildings are depicted further to the south and northeast. The San Diego and Arizona Eastern Railway is now labeled as the San Diego and Imperial Valley Railroad.	USGS Topographic Maps
1992	No changes noted.	Adjacent listings along Jewel Valley Road include Murphy's Well Drilling/Sun Country Real Estate Service (2175 Jewel Valley Road).	City Directories
1994	Area B consists of vacant land (possible ranching/grazing) and unimproved roads. Additional development of the landing strip has occurred.	The buildings/storage containers adjoining Area B to the northwest appear to have been removed. An additional structure is noted to the south of the hill to the southeast of Area B.	Aerial Photographs
1995	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
1996/1997	Additional development of the landing strip has occurred.	Additional rural residential development is noted further to the south and southeast.	USGS Topographic Maps/Aerial Photographs
2000	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
2002	A detention basin is no longer depicted.	A building/storage container adjoins Area B to the south.	Aerial Photographs
2005	The landing strip appears to be fully developed in its current configuration.	An AST is noted adjoining the landing strip to the north. The building to the south of Area B appears to have been removed. An additional building/structure is noted adjoining Area B to the west. Adjacent listings along Jewel Valley Road include residential uses and Benny and Son Garage/Computers and Cable (2175 Jewel Valley Road).	Aerial Photographs, City Directories
2009	No changes noted.	Structures to the south of the hill to the southeast of Area B appear to have been removed.	Aerial Photographs
2010	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses, K W Masonry (2121 Jewel Valley Road), and Benny & Son Garage (2175 Jewel Valley Road)	City Directories
2012	Two water wells are still depicted on the landing strip area.	No changes noted. No buildings are depicted on the topographic map.	USGS Topographic Maps, Aerial Photographs
2014	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and Benny & Sons Garage (2175 Jewel Valley Road).	City Directories
2015	No changes noted.	No buildings are depicted on the topographic map.	USGS Topographic Maps

Year	On-Site Use	Surrounding Uses	Source
2016	No changes noted.	No changes noted.	Aerial Photographs
2017	No changes noted.	No changes noted.	City Directories
2018	No changes noted.	No buildings are depicted on the topographic map.	USGS Topographic Maps
2020	Portions of Area B appear may be used for ranching/grazing purposes.	Land to the north of the landing strip may be used for ranching/grazing purposes. Adjacent listings along Jewel Valley Road include residential uses and K W Masonry (2121 Jewel Valley Road).	Aerial Photographs, City Directories
Notes: 1. <b>Bold</b> denotes an interval data gap, as described in <a href="#">Section 3.4.1.1, Methodology, Intervals</a> . 2. Other sources reviewed, but that which did not include information pertaining to the subject property included the following: Sanborn Maps. 3. Much of the southern portion of the subject property is not depicted in the aerial photograph.			
Source: Refer to <a href="#">Section 8.0, References</a> , and <a href="#">Appendix B</a> , for full citation and documentation of sources utilized in this table.			

#### 4.4.2.3 Area C Historical Uses Summary

Based upon the evaluation of documented land use as demonstrated in the resources reviewed as part of this Phase I ESA, Area C may have been used for grazing since at least 1975 and appears to have been used for ranching/grazing purposes from approximately 1989 until at least 2020. Unimproved roads were apparent on the subject property by 1975. A portion of Area C appears to have been graded by 1989. Area C has historically been surrounded by vacant land uses, transportation uses, rural residential uses, and ranching/grazing uses. A portion of a hill adjoining Area C to the east appeared to have been disturbed by 1975. Development of a landing strip to the north appeared to have begun by 1994 and was completed by 2005. The San Diego and Imperial Valley Railroad (formerly San Diego and Arizona Eastern Railway) was present to the south by 1939. Refer to [Table 4-4, Area C Historical Uses Summary](#).

**Table 4-5**  
**Area C Historical Uses Summary**

Year	On-Site Use	Surrounding Uses	Source
1939, 1942	Area C consists of vacant land.	Vacant land adjoins Area C to the north, east, south, and west. The surrounding area consists of vacant land, light duty and unimproved roads, intermittent streams (including Boundary Creek), and scattered buildings, primarily to the east and southeast of Area C. The San Diego and Arizona Eastern Railway, Hipass Station, and Lake Domingo are located further to the south.	USGS Topographic Maps
1953	No changes noted.	An unimproved road adjoins Area C to the north. The surrounding area consists of vacant land, light duty and	Aerial Photograph

Year	On-Site Use	Surrounding Uses	Source
		unimproved roads, streams, and several rural residential buildings. A pond is noted to further the northwest, and a railroad track is noted further to the south.	
1959	Area C consists of vacant land and an unimproved road.	Adjoining and surrounding land uses appear similar to those depicted in the 1942 topographic map. Jewel Valley Road is labeled as a light duty road further to the north. Additional unimproved roads and buildings as well as ponds and water wells are depicted in the general vicinity.	USGS Topographic Maps
1971	Not listed.	Listings along Jewel Valley Road include residential uses (no addresses provided).	City Directories
1975	Portions of Area C appear to have been cleared of vegetation.	A portion of a hill adjoining the subject property to the east appears to have been disturbed/cleared of vegetation. Additional rural residential development is noted further to the east-southeast. Note, the southern portion of the topographic map is not depicted.	USGS Topographic Maps, Aerial Photograph, City Directories
1979, 1982	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
1984	No changes noted.	Several buildings adjoining to the east appear to have been removed, and new buildings appear to have been constructed. A few small structures are noted to the south of the eastern-adjoining hill. A property further to the northwest appears to be developed with ranching buildings and ancillary structures. Additional rural residential development is noted further to the northeast and southeast.	Aerial Photographs
1986	No changes noted.	No changes noted.	City Directories
1989	The eastern portion of Area C may be used for ranching/grazing.	Adjoining and surrounding land uses appear generally similar to those depicted in the 1984 aerial photograph. Land further to the north appears to have been graded. Additional buildings/structures are noted further to the northwest.	Aerial Photographs
1991	No changes noted.	Several additional buildings are depicted adjoining to the south. Additional buildings are depicted further to the south and to the northeast. The San Diego and Arizona Eastern Railway is now labeled as the San Diego and Imperial Valley Railroad.	USGS Topographic Maps
1992	No changes noted.	Murphy's Well Drilling/Sun Country Real Estate Service (2175 Jewel Valley Road) is listed further to the north, to the	City Directories

Year	On-Site Use	Surrounding Uses	Source
		southeast of the intersection of Jewel Valley Road and Old Highway 80.	
1994	No changes noted.	An additional structure is noted to the south of the eastern-adjointing hill. Land further to the north appears to have been graded.	Aerial Photographs
1995	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and Benny's Garage/Sun Country Real Estate Service (2175 Jewel Valley Road)	City Directories
1996/1997	No changes noted	Additional grading of land further to the north has occurred. Additional rural residential development is noted further to the south and southeast.	USGS Topographic Maps, Aerial Photographs
2000	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
2002	An additional unimproved road is depicted on the eastern portion of Area C.	No changes noted.	Aerial Photographs
2005	An additional unimproved road is depicted on Area C. An area. The southwestern portion of Area C appears to have been disturbed.	An additional building/structure is noted further to the west. An unpaved landing strip has been developed to the north. Adjacent listings along Jewel Valley Road include residential uses and Benny and Son Garage/Computers and Cable (2175 Jewel Valley Road).	Aerial Photographs, City Directories
2009	No changes noted.	The structures to the south of the eastern-adjointing hill appear to have been removed.	Aerial Photographs
2010	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses, K W Masonry (2121 Jewel Valley Road), and Benny & Son Garage (2175 Jewel Valley Road)	City Directories
2012	No changes noted.	No changes noted. No buildings are depicted on the topographic map.	USGS Topographic Maps, Aerial Photographs
2014	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and Benny & Sons Garage (2175 Jewel Valley Road).	City Directories
2015	No changes noted.	No changes noted.	USGS Topographic Maps
2016	No changes noted.	No changes noted.	Aerial Photographs
2017	No changes noted.	No changes noted.	City Directories
2018	No changes noted.	No changes noted.	USGS Topographic Maps
2020	Area C consists of vacant land. The northern-most portion of Area C may be used for ranching/grazing purposes.	Land to the northwest appears to be used for ranching/grazing purposes. Adjacent listings along Jewel Valley Road include residential uses and K W Masonry (2121 Jewel Valley Road).	Aerial Photographs, City Directories

Year	On-Site Use	Surrounding Uses	Source
Notes:			
<ol style="list-style-type: none"> <li><b>Bold</b> denotes an interval data gap, as described in <a href="#">Section 3.4.1.1, Methodology, Intervals</a>.</li> <li>Other sources reviewed, but that which did not include information pertaining to the subject property included the following: Sanborn Maps.</li> </ol>			
Source: Refer to <a href="#">Section 8.0, References</a> , and <a href="#">Appendix B</a> , for full citation and documentation of sources utilized in this table.			

#### 4.4.2.4 Area D Historical Uses Summary

Based upon the evaluation of documented land use as demonstrated in the resources reviewed as part of this Phase I ESA, Area D appears to have consisted of vacant land since at least 1939. Unimproved roads were apparent on Area D by 1975. Area D has historically been surrounded by vacant land uses, transportation uses, and rural residential uses. Development of a landing strip to the north appeared to have begun by 1994 and was completed by 2005. The San Diego and Imperial Valley Railroad (formerly San Diego and Arizona Eastern Railway) was present to the south by 1939. Refer to [Table 4-5, Area D Historical Uses Summary](#).

**Table 4-6**  
**Area D Historical Uses Summary**

Year	On-Site Use	Adjoining and Surrounding Uses	Source
1939, 1942	Area D consists of vacant land.	Vacant land adjoins Area D to the north, east, south, and west. An unimproved road adjoins Area D to the west and east. The surrounding area consists of vacant land, light duty and unimproved roads, intermittent streams (including Boundary Creek), and scattered buildings, primarily to the east and northeast of Area D. The San Diego and Arizona Eastern Railway, Hipass Station, and Lake Domingo are located further to the south.	USGS Topographic Maps
1953	No changes noted.	The surrounding area consists of vacant land, light duty and unimproved roads, streams, and several rural residential buildings to the east and northeast. A railroad track is noted to the south.	Aerial Photograph
1959	No changes noted.	Adjoining and surrounding land uses appear similar to those depicted in the 1942 topographic map. Jewell Valley Road is labeled as a light duty road further to the north. Additional unimproved roads and buildings as well as ponds and water wells are depicted in the general vicinity.	USGS Topographic Maps
1971	Not listed.	Listings along Jewel Valley Road include residential uses (no addresses listed).	City Directories

Year	On-Site Use	Adjoining and Surrounding Uses	Source
1975	Area D consists of vacant land and unimproved roads.	Adjoining and surrounding land uses appear similar to those depicted in the 1959 topographic map. Additional rural residential development is noted further to the east. Note, the southern portion of the topographic map is not depicted.	USGS Topographic Maps, Aerial Photograph, City Directories
1979, 1982	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
1984	Additional unimproved roads are depicted on Area D.	Several buildings further to the northeast appear to have been removed, and new buildings appear to have been constructed. A property to the north appears to be developed with ranching buildings and ancillary structures. Additional rural residential development is noted to the northeast and east.	Aerial Photographs
1986	No changes noted.	No changes noted.	City Directories
1989	No changes noted.	Adjoining and surrounding land uses appear generally similar to those depicted in the 1984 aerial photograph. Land further to the north and northeast appears to have been graded. Additional buildings/structures are noted to the north.	Aerial Photographs
1991	No changes noted.	Several additional buildings are depicted further to the northeast. The San Diego and Arizona Eastern Railway is now labeled as the San Diego and Imperial Valley Railroad.	USGS Topographic Maps
1992	No changes noted.	Adjacent listings along Jewel Valley Road include Murphy's Well Drilling/Sun Country Real Estate Service (2175 Jewel Valley Road).	City Directories
1994	No changes noted.	Additional land further to the north appears to have been graded.	Aerial Photographs
1995	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and Benny's Garage/Sun Country Real Estate Service (2175 Jewel Valley Road).	City Directories
1996/1997	No changes noted	Additional grading of land to the north has occurred. Additional rural residential development is noted to the northeast and east.	USGS Topographic Maps, Aerial Photographs
2000	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
2002	No changes noted.	No changes noted.	Aerial Photographs
2005	No changes noted	An additional building/structure is noted to further to the north. An unpaved landing strip has been developed to the north. Adjacent listings along Jewel Valley Road include residential uses	Aerial Photographs, City Directories

Year	On-Site Use	Adjoining and Surrounding Uses	Source
		and Benny and Son Garage/Computers and Cable (2175 Jewel Valley Road).	
2009	No changes noted.	No changes noted.	Aerial Photographs
2010	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses, K W Masonry (2121 Jewel Valley Road), and Benny & Son Garage (2175 Jewel Valley Road)	City Directories
2012	No changes noted.	No changes noted. No buildings are depicted on the topographic map.	USGS Topographic Maps, Aerial Photographs
2014	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and Benny & Sons Garage (2175 Jewel Valley Road).	City Directories
2015	No changes noted.	No changes noted.	USGS Topographic Maps
2016	No changes noted.	No changes noted.	Aerial Photographs
2017	No changes noted.	No changes noted.	City Directories
2018	No changes noted.	No changes noted.	USGS Topographic Maps
2020	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and K W Masonry (2121 Jewel Valley Road).	Aerial Photographs, City Directories
Notes:			
<ol style="list-style-type: none"> <li><b>Bold</b> denotes an interval data gap, as described in <a href="#">Section 3.4.1.1, Methodology, Intervals</a>.</li> <li>Other sources reviewed, but that which did not include information pertaining to the subject property included the following: Sanborn Maps.</li> </ol>			
Source: Refer to <a href="#">Section 8.0, References</a> , and <a href="#">Appendix B</a> , for full citation and documentation of sources utilized in this table.			

#### 4.4.2.5 Area E Historical Uses Summary

Based upon the evaluation of documented land use as demonstrated in the resources reviewed as part of this Phase I ESA, Area E appears to have consisted of vacant land and an unimproved road since at least 1939. Area E has historically been surrounded by vacant land uses, transportation uses, and rural residential uses. Development of a landing strip to the north appeared to have begun by 1994 and was completed by 2005. The San Diego and Imperial Valley Railroad (formerly San Diego and Arizona Eastern Railway) was present to the south by 1939. Refer to [Table 4-6, Area E Historical Uses Summary](#).

**Table 4-7**  
**Area E Historical Uses Summary**

Year	On-Site Use	Adjoining and Surrounding Uses	Source
1939, 1942	Area E consists of vacant land and an unimproved road.	Vacant land adjoins Area E to the north, east, south, and west. An unimproved road adjoins Area E to the west and south. The surrounding area consists of	USGS Topographic Maps

Year	On-Site Use	Adjoining and Surrounding Uses	Source
		vacant land, light duty and unimproved roads, intermittent streams (including Boundary Creek), and scattered buildings further to the east and northeast of Area E. The San Diego and Arizona Eastern Railway, Hipass Station, and Lake Domingo are located further to the south.	
1953	No changes noted.	The surrounding area consists of vacant land, light duty and unimproved roads, streams, and several rural residential buildings to the east and northeast. A railroad track is noted further to the south.	Aerial Photograph
1959	Area E consists of vacant land.	Adjoining and surrounding land uses appear similar to those depicted in the 1942 topographic map. Jewell Valley Road is labeled as a light duty road further to the north. Additional unimproved roads and buildings as well as ponds and water wells are depicted in the general vicinity.	USGS Topographic Maps
1971	Not listed.	Listings along Jewel Valley Road include residential uses (no addresses provided).	City Directories
1975	Area E consists of vacant land and an unimproved road.	Adjoining and surrounding land uses appear similar to those depicted in the 1959 topographic map. Additional rural residential development is noted further to the northeast. Note, the southern portion of the topographic map is not depicted.	USGS Topographic Maps, Aerial Photograph, City Directories
1979, 1982	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
1984	No changes noted.	Several buildings further to the northeast appear to have been removed, and new buildings appear to have been constructed. A property to the north appears to be developed with ranching buildings and ancillary structures. Additional rural residential development is noted further to the northeast and east.	Aerial Photographs
1986	No changes noted.	No changes noted.	City Directories
1989	No changes noted.	Adjoining and surrounding land uses appear generally similar to those depicted in the 1984 aerial photograph. Land further to the north appears to have been graded. Additional buildings/structures are noted further to the north.	Aerial Photographs
1991	No changes noted.	Several additional buildings are depicted further to the north and northeast. The San Diego and Arizona	USGS Topographic Maps

Year	On-Site Use	Adjoining and Surrounding Uses	Source
		Eastern Railway is now labeled as the San Diego and Imperial Valley Railroad.	
1992	No changes noted.	Adjacent listings along Jewel Valley Road include Murphy's Well Drilling/Sun Country Real Estate Service (2175 Jewel Valley Road).	City Directories
1994	No changes noted.	Additional land to the north appears to have been graded.	Aerial Photographs
1995	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and Benny's Garage/Sun Country Real Estate Service (2175 Jewel Valley Road).	City Directories
1996/1997	No changes noted.	Additional grading of land to the north has occurred. Additional rural residential development is noted further to the northeast and east.	USGS Topographic Maps, Aerial Photographs
2000	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
2002	No changes noted.	No changes noted.	Aerial Photographs
2005	No changes noted	An additional building/structure is noted further to the northwest. An unpaved landing strip has been developed to the north. Adjacent listings along Jewel Valley Road include residential uses and Benny and Son Garage/Computers and Cable (2175 Jewel Valley Road).	Aerial Photographs, City Directories
2009	No changes noted.	No changes noted.	Aerial Photographs
2010	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses, K W Masonry (2121 Jewel Valley Road), and Benny & Son Garage (2175 Jewel Valley Road)	City Directories
2012	No changes noted.	No changes noted. No buildings are depicted on the topographic map.	USGS Topographic Maps, Aerial Photographs
2014	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and Benny & Sons Garage (2175 Jewel Valley Road).	City Directories
2015	No changes noted.	No changes noted.	USGS Topographic Maps
2016	No changes noted.	No changes noted.	Aerial Photographs
2017	No changes noted.	No changes noted.	City Directories
2018	No changes noted.	No changes noted.	USGS Topographic Maps
2020	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and K W Masonry (2121 Jewel Valley Road).	Aerial Photographs, City Directories

Year	On-Site Use	Adjoining and Surrounding Uses	Source
Notes:			
<ol style="list-style-type: none"> <li><b>Bold</b> denotes an interval data gap, as described in <a href="#">Section 3.4.1.1, Methodology, Intervals</a>.</li> <li>Other sources reviewed, but that which did not include information pertaining to the subject property included the following: Sanborn Maps.</li> </ol>			
Source: Refer to <a href="#">Section 8.0, References</a> , and <a href="#">Appendix B</a> , for full citation and documentation of sources utilized in this table.			

#### 4.4.2.6 Area F Historical Uses Summary

Based upon the evaluation of documented land use as demonstrated in the resources reviewed as part of this Phase I ESA, the subject property appears to have consisted of vacant land and unimproved roads from at least 1939 to present day. The subject property has historically been surrounded by vacant land uses, transportation uses, rural residential uses, and ranching/grazing land. Refer to [Table 4-7, Area F Historical Uses Summary](#).

**Table 4-8**  
**Area F Historical Uses Summary**

Year	On-Site Use	Adjoining and Surrounding Uses	Source
1939, 1942	Area F consists of vacant land and an unimproved road.	Vacant land adjoins Area F to the west and north. An unimproved road adjoins Area F to the east, and the San Diego and Arizona Eastern Railway adjoins Area F to the south. The surrounding area consists of vacant land, light duty and unimproved roads, intermittent streams (including Boundary Creek), and scattered buildings, primarily further to the east and northeast of Area F. Hipass Station and Lake Domingo are located further to the southwest and southeast, respectively.	USGS Topographic Maps
1956	No changes noted.	A railroad track adjoins Area F to the south. The surrounding area consists of vacant land, a stream, and unimproved roads.	Aerial Photographs
1959	Area F consists of vacant land. An on-site unimproved road is not depicted.	Adjoining and surrounding land uses appear similar to those depicted in the 1942 topographic map. Jewell Valley Road is labeled as a light duty road further to the north. Additional unimproved roads and buildings as well as ponds and water wells are depicted in the general vicinity.	USGS Topographic Maps
1971	Not listed.	Listings along Jewel Valley Road include residential uses (no addresses listed).	City Directories
1975	Area F consists of vacant land and unimproved roads.	Adjoining and surrounding land uses appear similar to those depicted in the 1959 topographic map. A lake is depicted further to the south. Note, most	USGS Topographic Maps, Aerial Photographs, City Directories

Year	On-Site Use	Adjoining and Surrounding Uses	Source
		of the southern portion of the topographic map is not depicted.	
1979, 1982	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
1984	No changes noted.	Rural residential development is noted further to the north and northeast. A dry lake or disturbed area (possibly mining activity) is noted further to the south.	Aerial Photographs
1986	No changes noted.	No changes noted.	City Directories
1989	No changes noted.	Additional rural residential buildings are noted further to the northeast.	Aerial Photographs
1991	No changes noted.	Additional buildings are noted further to the north. The San Diego and Arizona Eastern Railway is now labeled as the San Diego and Imperial Valley Railroad.	USGS Topographic Maps
1992	No changes noted.	Adjacent listings along Jewel Valley Road include Murphy's Well Drilling/Sun Country Real Estate Service (2175 Jewel Valley Road).	City Directories
1994	No changes noted.	No changes noted.	Aerial Photographs
1995	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
1996, 1997	No changes noted.	Several buildings further to the north are no longer depicted in the topographic map. A property further to the northeast appears to be used for ranching/grazing purposes.	USGS Topographic Maps, Aerial Photographs
2000	No changes noted.	No changes noted.	City Directories
2002	No changes noted.	Additional structures (likely associated with ranching/grazing uses) are noted further to the north. One of the lakes or disturbed areas (possibly mining activity) to the south of Area F appears to be dry.	Aerial Photographs
2005	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses and Liberty Advanced (1585 Jewel Valley Road). The lakes or disturbed areas (possibly mining activity) to the south of Area F appear to contain water again.	Aerial Photographs, City Directories
2009	No changes noted.	One of the lakes or disturbed areas (possibly mining activity) to the south of Area F appears to be mostly dry.	Aerial Photographs
2010	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
2012	No changes noted.	The San Diego and Imperial Valley Railroad is not depicted on the topographic map, nor are any buildings.	USGS Topographic Maps, Aerial Photographs
2014	No changes noted.	No changes noted.	City Directories
2015	No on-site unimproved roads are depicted on the topographic map.	The San Diego and Imperial Valley Railroad is again depicted. No buildings are depicted on the topographic map.	USGS Topographic Maps

Year	On-Site Use	Adjoining and Surrounding Uses	Source
2016	No changes noted	One of the lakes or disturbed areas (possibly mining activity) to the south of Area F appears to be dry.	Aerial Photographs
2017	No changes noted.	No changes noted.	City Directories
2018	No on-site unimproved roads are depicted on the topographic map.	An intermittent stream is no longer depicted further to the south. No buildings are depicted on the topographic map.	USGS Topographic Maps
2020	No changes noted.	No changes noted	Aerial Photographs, City Directories
Notes: 1. <b>Bold</b> denotes an interval data gap, as described in <a href="#">Section 3.4.1.1, Methodology, Intervals</a> . 2. Other sources reviewed, but that which did not include information pertaining to the subject property included the following: Sanborn Maps.			
Source: Refer to <a href="#">Section 8.0, References</a> , and <a href="#">Appendix B</a> , for full citation and documentation of sources utilized in this table.			

#### 4.4.2.7 Area G Historical Uses Summary

Based upon the evaluation of documented land use as demonstrated in the resources reviewed as part of this Phase I ESA, Area G appears to have consisted of vacant land and unimproved roads from at least 1939 to present day. Additionally, a portion of the San Diego and Imperial Valley Railroad/San Diego and Arizona Eastern Roadway was present on the proposed access road to Area G by 1939. Area G has historically been surrounded by vacant land uses, transportation uses, rural residential uses, ranching/grazing land, and possible mining activities. Refer to [Table 4-8, Area G Historical Uses Summary](#).

**Table 4-9**  
**Area G Historical Uses Summary**

Year	On-Site Use	Adjoining and Surrounding Uses	Source
1939, 1942	Area G consists of vacant land, an unimproved road, and a portion of the San Diego and Arizona Eastern Railway railroad track.	Vacant land adjoins Area G to the west, east, and south. A building adjoins Area G to the west, and additional scattered buildings are noted further to the northeast and east. The San Diego and Arizona Eastern Railway adjoins Area G to the north. The surrounding area consists of vacant land, light duty and unimproved roads, and intermittent streams (including Boundary Creek). Hipass Station and Lake Domingo are located further to the southwest and southeast, respectively.	USGS Topographic Maps
1956	Area G consists of vacant land, unimproved roads, a stream, and a portion of a railroad track.	A railroad track adjoins Area G to the north. The surrounding area consists of vacant land, a stream, and unimproved roads.	Aerial Photographs

Year	On-Site Use	Adjoining and Surrounding Uses	Source
1959	Area G consists of vacant land, an unimproved road, a portion of the San Diego and Arizona Eastern Railway railroad track, and an intermittent stream.	Adjoining and surrounding land uses appear similar to those depicted in the 1942 topographic map. Jewell Valley Road is labeled as a light duty road further to the north. Additional unimproved roads and buildings as well as ponds and water wells are depicted in the general vicinity.	USGS Topographic Maps
1971	Not listed.	Listings along Jewel Valley Road include residential uses (no addresses listed).	City Directories
1975	Most of Area G is not depicted on the 1975 topographic map.	Adjoining and surrounding land uses appear similar to those depicted in the 1959 topographic map. A lake adjoins Area G to the west. Note, most of the southern portion of the topographic map is not depicted.	USGS Topographic Maps, Aerial Photographs, City Directories
1979, 1982	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
1984	Additional unimproved roads are depicted.	Rural residential development is noted further to the north. A dry lake or disturbed area (possibly mining activity) is noted further to the south.	Aerial Photographs
1986	No changes noted.	No changes noted.	City Directories
1989	No changes noted.	Additional rural residential buildings are noted further to the northeast.	Aerial Photographs
1991	The on-site railroad is now labeled as the San Diego and Imperial Valley Railroad.	The building adjoining Area G to the west is no longer depicted. Additional buildings are noted further to the north.	USGS Topographic Maps
1992	No changes noted.	Adjacent listings along Jewel Valley Road include Murphy's Well Drilling/Sun Country Real Estate Service (2175 Jewel Valley Road).	City Directories
1994	Two previously depicted unimproved roads are no longer apparent.	No changes noted.	Aerial Photographs
1995	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
1996, 1997	No changes noted.	A building is depicted adjoining Area G to the west. Several buildings further to the north are no longer depicted in the topographic map. A property further to the north appears to be used for ranching/grazing purposes.	USGS Topographic Maps, Aerial Photographs
2000	No changes noted.	No changes noted.	City Directories
2002	No changes noted.	Additional structures (likely associated with ranching/grazing uses) are noted further to the north. The lake or disturbed area (possibly mining activity) adjoining Area G to the west appears to be dry.	Aerial Photographs
2005	Ponding is noted near the southwestern portion of Area G.	Adjacent listings along Jewel Valley Road include residential uses and Liberty Advanced (1585 Jewel Valley	Aerial Photographs, City Directories

Year	On-Site Use	Adjoining and Surrounding Uses	Source
		Road). The lakes or disturbed areas (possibly mining activity) to the west and south of Area G appear to contain water again.	
2009	The on-site pond appears to be dry.	The lake or disturbed area (possibly mining activity) to the south of Area G appears to be mostly dry.	Aerial Photographs
2010	No changes noted.	Adjacent listings along Jewel Valley Road include residential uses.	City Directories
2012	Ponding is again apparent near the southwestern portion of Area G. The San Diego and Imperial Valley Railroad is not depicted on the topographic map.	No buildings are depicted on the topographic map.	USGS Topographic Maps, Aerial Photographs
2014	No changes noted.	No changes noted.	City Directories
2015	The San Diego and Imperial Valley Railroad is again depicted.	No changes noted.	USGS Topographic Maps
2016	No changes noted	The lakes or disturbed areas (possibly mining activity) to the west and south of Area G appear to be dry.	Aerial Photographs
2017	No changes noted.	No changes noted.	City Directories
2018	An intermittent stream is not depicted on-site.	No changes noted.	USGS Topographic Maps
2020	Ponding is again apparent near the southwestern portion of Area G.	No changes noted.	Aerial Photographs, City Directories
Notes:			
3. <b>Bold</b> denotes an interval data gap, as described in <a href="#">Section 3.4.1.1, Methodology, Intervals</a> .			
4. Other sources reviewed, but that which did not include information pertaining to the subject property included the following: Sanborn Maps.			
Source: Refer to <a href="#">Section 8.0, References</a> , and <a href="#">Appendix B</a> , for full citation and documentation of sources utilized in this table.			

#### 4.4.2.8 Property Tax Files

Michael Baker searched the subject property for property data via the San Diego County Assessor/Recorder/County Clerk online database, *ParcelQuest*, and the County of San Diego Planning and Development Services (PDS) online database, *Zoning and Property Information*. Property data for the subject property is included in [Table 4-9, Property Data Summary](#) (refer to [Appendix B](#)).

**Table 4-10**  
**Property Data Summary**

Assessor Parcel Number	Acreage	Use Type
612-082-12	92.55	Miscellaneous
612-090-59	12.71	Miscellaneous
612-090-68	82.39	Single Family Residential

Assessor Parcel Number	Acreage	Use Type
612-110-02	259.17	Miscellaneous
612-110-04	51.13	Miscellaneous
612-110-17	127.74	Miscellaneous
612-110-18	158.16	Multiple Family Residential
612-110-19	15.79	Miscellaneous
612-120-01	80.00	Miscellaneous
659-020-01	80.75	Miscellaneous
659-020-02	195.76	Miscellaneous
659-020-05	37.33	Miscellaneous
659-020-06	36.01	Miscellaneous
659-080-02	156.2	Miscellaneous
659-080-08	23.71	--
Source: San Diego County Assessor/Recorder/County Clerk, <i>ParcelQuest</i> , <a href="https://assr.parcelquest.com/Home">https://assr.parcelquest.com/Home</a> , accessed June 5, 2023.		

#### 4.4.2.9 Zoning/Land Use Records

Zoning/land use records generally consist of records maintained by the local government in which the subject property is located. They indicate the uses permitted by the local government for particular zones within its jurisdiction. The records may consist of maps and/or written records. According to the County of San Diego PDS online *Zoning and Property Information* database, the 15 APNs comprising the subject property are zoned S92, General Rural, and are designated by the *San Diego County General Plan* as Rural Lands (RL-80).

#### 4.4.2.10 Oil and Gas Wells

The California Department of Conservation, Geologic Energy Management Division (CalGEM, formerly DOGGR) online mapping system Well Finder documents existing and historical oil and

gas wells in California. Current well status for any well indicated in the online mapping system should be confirmed at the appropriate CalGEM Office. Michael Baker reviewed the CalGEM online mapping system Well Finder on June 5, 2023; refer to [Appendix B](#). According to CalGEM, no oil or gas wells are located within the boundaries of Areas A through G or immediate vicinity and Areas A through G do not appear to be located within an oil/gas field.

#### **4.4.2.11 Other Historical Sources**

Other historical sources include miscellaneous maps, newspaper archives, and records in the files and/or personal knowledge of the property owner and/or occupants. The Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration's (PHMSA) *National Pipeline Mapping System (NPMS) Public Map Viewer* documents gas transmission and hazardous liquid pipelines, liquefied natural gas plants, and breakout tanks in the United States. Michael Baker reviewed NPMS on June 5, 2023; refer to [Appendix B](#). According to the NPMS, no natural gas transmission pipelines or petroleum pipelines are located within the boundaries of Areas A through G or within one mile of Areas A through G. Additionally, no pipeline-related accidents or incidents have been reported within one mile of Areas A through G. No other sources were reviewed by Michael Baker during the course of this Phase I ESA.

# SECTION 5.0

## INTERVIEWS

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The ASTM E 1527-21 Standard Practice indicates that the objective of interviews is to obtain information indicating RECs in connection with the subject property. Interviews with past and present owners, operators, and occupants of the subject property consist of questions to be asked in the manner and of persons as described in the ASTM E 1527-21 Standard Practice. The content of questions to be asked shall attempt to obtain information about uses and conditions observed during the site reconnaissance as well as the documentation review. The content of questions to be asked of State and/or local government officials shall be decided in the discretion of the environmental professional(s) conducting the Phase I ESA, provided that the questions shall generally be directed towards identifying RECs in connection with the subject property.

### 5.1 PROPERTY OWNER

Ms. Shauna Dawson, the property owner representative, Ranch Manager of Empire Ranch (1758 Jewel Valley Road), provided Michael Baker with information regarding the subject property on June 16, 2023 via a Property Owner Questionnaire (refer to [Appendix B](#)). Ms. Dawson has been associated with the property for 14 years. Ms. Dawson indicated that one dry well is located on-site, which was previously used for watering cows. Ms. Dawson does not know of any current or historical land uses that handle, generate, or store hazardous materials on the subject property or on any adjoining properties. Further, Ms. Dawson stated that, based on her knowledge and experience related to the subject property, there is no obvious indicators that point to the presence or likely presence of contamination at the subject property.

### 5.2 KEY SITE MANAGER/OPERATOR

A key site manager is a person with good knowledge of the uses and physical characteristics of the property. Often the Key Site Manager is the property manager, the chief physical plant supervisor, or head maintenance person. If the user is the current property owner, the user has an obligation to identify a key site manager, even if it is the user himself or herself.

Ms. Dawson has been identified as the Key Site Manager for the purposes of this analysis and provided information during the site reconnaissance of the subject property conducted on June 20, 2023. According to Ms. Dawson (to the best of her knowledge), the subject property has always

been vacant. She is unaware of the current or historical presence of USTs, hazardous materials, or mining operations at the subject property.

Ms. Dawson has provided Michael Baker with information regarding the subject property on June 16, 2023, via a Property Owner Questionnaire (refer to [Appendix B](#)). Information provided has been discussed in detail in [Section 5.1, \*Property Owner\*](#), and throughout this Phase I ESA.

## 5.3 OCCUPANTS

No occupants are associated with the subject property as the subject property consists of vacant land. As such, no occupants were available for interview during the course of this Phase I ESA.

## 5.4 LOCAL GOVERNMENT OFFICIALS

Michael Baker requested public records from the County of San Diego DEHQ, HMD, for the following properties reported in databases searched by EDR (refer to [Section 4.1, \*Standard Environmental Records Sources\*](#)):

- **APN 659-080-02:** Records were requested from the County of San Diego DEHQ, HMD, on June 13, 2023. On June 15, 2023, HMD indicated no records are available for the requested address.
- **40749 Old Highway 80 (San Diego Gas and Electric):** Records were requested from the County of San Diego DEHQ, HMD, on June 22, 2023. On June 27, 2023, HMD provided records for the facility. Pertinent information from the records received are summarized in [Section 4.3.1](#).

No other interviews with local government officials were conducted during the course of this Phase I ESA.

## 5.5 OTHER PERSONS

No other persons were interviewed during the course of this Phase I ESA.

# SECTION 6.0

## FINDINGS AND OPINIONS

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The following findings and opinions are based upon review of reasonable ascertainable referenced material available to Michael Baker during the preparation of this Phase I ESA, which included a review of historical aerial photographs, historical topographic maps, regulatory databases, and other documentation, as well as interviews and site reconnaissance.

### 6.1 CURRENT ON-SITE USES

The subject property currently consists of vacant land, including an unimproved landing strip to the northeast of Areas B and C. Available public records were searched by EDR and findings were provided to Michael Baker on June 9 and 12, 2023. The lists of public records reviewed did not report any regulatory properties within the boundaries of Areas A through F. One regulatory property was reported within the boundaries of Area G (refer to Section 6.2.4, *Risley Burroughs Deposit/Risley Deposit*, below). No known corrective action, restoration, or remediation has been planned, is currently taking place, or has been completed on the subject property. The subject property has not been under investigation for violation on any environmental laws, regulations, or standards, as identified in the databases reported by EDR.

Further, Michael Baker performed a visual observation of readily accessible areas of the subject property and immediately adjoining properties (site inspection) on June 20, 2023. Unimproved roads were noted on portions of the subject property. Additional on-site observations are described in Sections 6.1.2, *PCBs*, through 6.1.4, *Industrial Drums*, below. Based on reasonable ascertainable referenced material reviewed and site inspection conducted during this Phase I ESA, it is the opinion of Michael Baker that the current on-site uses of the subject property have not resulted in a REC at the time of this Phase I ESA.

#### 6.1.1 PCBs

During the site reconnaissance of the subject property, one pole-mounted transformer was observed in the southwestern portion of Area A. PCBs could be associated with the on-site transformer; however, the transformer appeared to be in good condition, and no evidence of leakage or staining was observed. Thus, it is Michael Baker's opinion that no REC has resulted in this regard.

### **6.1.2 Industrial Drums**

Two industrial drums were noted in the southwestern portion of Area G, near an area of natural ponding. According to Key Site Manager Shauna Dawson (to the best of her knowledge), the drums are likely used to store firewood and do not contain hazardous materials. No leaking, staining, or other indications of a release of hazardous materials was observed in the vicinity of the drums. Therefore, it is Michael Baker's opinion that no REC has resulted in this regard.

### **6.1.3 On-site Fertilizer and Pesticides**

According to Mr. Chris Fahey, Chief Operating Officer of Empire Ranch II, LLC and the user of this Phase I ESA, fertilizers and pesticides have been used at on-site oak trees. Such operations appeared to use standard customary practice for ranching uses. Therefore, it is Michael Baker's opinion that no REC has resulted in this regard.

### **6.1.4 Water Wells**

Based on a review of historic topographic maps, two water wells were depicted on the current landing strip area from at least 1959 to 2018. Further, during the site reconnaissance of the subject property, one water well was noted near the southwestern portion of Area A. According to Ms. Shauna Dawson, the Ranch Manager of Empire Ranch (1758 Jewel Valley Road) and the Key Site Manager for the purposes of this Phase I ESA, the well is dry and was previously used for watering cows. The water wells appear to be associated with the western-adjointing Empire Ranch property. Based on the land use associated with the on-site water wells (ranching), it is Michael Baker's opinion that no REC has resulted in this regard.

## **6.2 PAST ON-SITE USES**

### **6.2.1 Vacant Land**

Based upon the evaluation of public records provided by EDR, Area A and Areas D through F as well as the on-site portion of land within the Jewel Valley Road right-of-way have consisted of vacant land and unimproved roads from at least 1939 to present day. Development of the on-site landing strip appeared to have begun by 1994 and was fully developed by 2005.

Vacant land uses are not typically associated with the handling/storage or transport of hazardous materials. Further, Area A and Areas D through F have not been under investigation for violation on any environmental laws, regulations, or standards, as identified in the databases reported by EDR. Therefore, it is the opinion of Michael Baker that past on-site uses (vacant land) of Area A,

Areas D through F, and the on-site landing strip have not resulted in a REC at the time of this Phase I ESA.

### **6.2.2 Ranching/Grazing Activities**

Based on Michael Baker's review of historical documentation, Area B may have been used as ranching/grazing land beginning in 1989. A portion of a detention basin was present on-site from at least 1989 until sometime prior to 2002. Various buildings/storage containers were noted adjoining Area B from at least 1989 to 2005. During the site reconnaissance of the subject property, Area B appeared to consist of former ranching/grazing land. Further, according to Ms. Shauna Dawson, one dry well is located on the subject property and was previously used for watering cows.

Additionally, based on Michael Baker's review of historical documentation, Area C may have been used as ranching/grazing land beginning in 1989. During the site reconnaissance of the subject property, Area C appeared to consist of former grazing land.

The former ranching/grazing land use of Areas B and C appeared to be ancillary uses supporting historic and current ranching operations at the western-adjoining Empire Ranch property. No current or former chemicals of concern were identified as being used on-site by either the user of this Phase I ESA or the current owner of the subject property. Therefore, it is Michael Baker's opinion that the former ranching/grazing land use of Areas B and C have not resulted in a REC at the time of this Phase I ESA.

### **6.2.3 Landing Strip**

Based on Michael Baker's review of historical documentation, a building was present on the current landing strip area from at least 1939 to 1942. This area of the subject property has since been graded and was developed with an unpaved landing strip by 2005, which is no longer operational. All ancillary facilities associated with the landing strip appear to be off-site, adjoining the subject property. As such, it is the opinion of Michael Baker that the landing strip use has not resulted in a REC.

### **6.2.4 San Diego Eastern Railway/San Diego and Imperial Valley Railroad**

Active and inactive railroad beds frequently have concentrations of petroleum products and lead elevated above natural background conditions. Petroleum product concentrations and lead concentrations are derived from drippings from rail vehicles and flaked paint, respectively.

Wooden railroad ties may contain preservatives (i.e., creosote), some of which may contain hazardous constituents. Track switch locations often have elevated levels of petroleum hydrocarbons. Inorganic and organic herbicides, along with diesel fuel, may have been used for vegetation control.

Based on a review of historic documentation, a portion of the San Diego Eastern Railway (later named the San Diego and Imperial Valley Railroad) was apparent on the proposed access road to Area G by 1939. The railroad is no longer operational. Railroad tracks are typically associated with the use of pesticides and arsenic and the presence of gasoline, diesel, and/or creosote underneath and surrounding the railroad is likely. Therefore, it is Michael Baker's opinion that the former on-site railroad track is considered a REC.

## **6.3 CURRENT ADJOINING USES**

Adjoining uses include vacant land, rural residential uses, transportation uses (Jewel Valley Road, unimproved roads, and the San Diego Eastern Railway/San Diego and Imperial Valley Railroad), and ranching operations. The following is a discussion of Michael Baker's findings and opinions regarding such adjoining uses with respect to hazardous materials.

### **6.3.1 Vacant Land**

Vacant land currently adjoins several portions of the subject property. Vacant land uses are not typically associated with the handling/storage or transport of hazardous materials. Further, no current adjoining properties have been under investigation for violation of any environmental laws, regulations, or standards, as identified in the databases reported by EDR. Therefore, it is the opinion of Michael Baker that current adjoining uses (vacant land) have not resulted in a REC at the time of this Phase I ESA.

### **6.3.2 Rural Residential Uses**

Rural residential uses currently adjoin several portions of the subject property. Residential land uses are not typically associated with the handling/storage or transport of hazardous materials. During the site reconnaissance of the subject property, one aboveground storage tank (AST) was observed to the northeast of the on-site landing strip, which is likely used to store water. Further, several ASTs were observed at a property (1664 Jewel Ranch Road) to the southwest of the on-site landing strip and at a property (1909 Jewel Valley Road) adjoining Area A to the northwest. The ASTs appeared to be stored properly and in good condition. Further, no current adjoining rural residential properties have been under investigation for violation of any environmental laws, regulations, or standards, as identified in the databases reported by EDR. Therefore, it is

the opinion of Michael Baker that current adjoining rural residential uses have not resulted in a REC at the time of this Phase I ESA.

### **6.3.3 Ranching Operations**

The Empire Ranch property (1758 Jewel Valley Road) currently adjoins Area A to the southwest and Area B to the northwest. During the site reconnaissance of the subject property, no visible or physical evidence was observed to suggest that a surface release of petroleum-based or hazardous materials or waste have recently occurred. No unusual or suspicious materials handling or storage practices were observed with respect to the Empire Ranch property. Further, the property has not been under investigation for violation on any environmental laws, regulations, or standards, as identified in the databases reported by EDR. Therefore, it is the opinion of Michael Baker that the adjoining Empire Ranch property has not resulted in a REC at the time of this Phase I ESA.

### **6.3.4 San Diego Gas and Electric (40749 Old Highway 80)**

The SDGE facility is located at 40749 Old Highway 80, to the northwest of the northeastern gentie line area. Based on the EDR report for Area A, the facility was reported as a large-quantity generator of hazardous waste in May 2014. No violations were reported. Records were requested from the County of San Diego DEHQ, HMD, on June 22, 2023. Records provided by HMD on June 27, 2023, included several Annual and Carcinogen and Reproductive Toxin Reporting Lists prepared for the SDGE facility from 2014 to 2019. The records indicate the facility maintained vacuum pump fluid; “imbiber beads absorbent product;” “lead acid battery wet, filled with acid;” electro-contact cleaner; silica sands and gravel; lead and lead compounds; arsenic; and strong inorganic acid mists containing sulfuric acid. Further, HMD records included several Compliance Inspection Reports prepared for the facility. According to a March 16, 2023 Compliance Inspection Report, the facility stores electrolytic batteries, dielectric mineral oil, sulfur hexafluoride, and nitrogen gas. No violations were reported during routine compliance evaluation inspections conducted in May 2017, September 2019, and March 2023. Thus, it is the opinion of Michael Baker that the current SDGE facility has not resulted in a REC at the time of this Phase I ESA.

## **6.4 PAST ADJOINING USES**

Based on the available documentation reviewed and a site inspection conducted as part of this Phase I ESA, off-site adjoining uses appear to have historically consisted of vacant land, rural residential uses, transportation uses (Jewel Valley Road, unimproved roads, and the San Diego Eastern Railway/San Diego and Imperial Valley Railroad), ranching operations, and mining

activities, as further described in Section 6.4.1, Walker Deposit, below. Based on the available documentation, interviews, and a site reconnaissance conducted as part of this Phase I ESA, it is the opinion of Michael Baker that past adjoining uses have not resulted in a REC at the subject property.

#### **6.4.1 Vacant Land**

Vacant land has adjoined the subject property from at least 1939 to present day. Vacant land uses are not typically associated with the handling/storage or transport of hazardous materials. Further, no past adjoining properties have been under investigation for violation of any environmental laws, regulations, or standards, as identified in the databases reported by EDR. Therefore, it is the opinion of Michael Baker that past adjoining uses (vacant land) have not resulted in a REC at the time of this Phase I ESA.

#### **6.4.2 Rural Residential**

Rural residential uses have adjoined the subject property from at least 1939. Residential land uses are not typically associated with the handling/storage or transport of hazardous materials. Further, no past adjoining properties have been under investigation for violation of any environmental laws, regulations, or standards, as identified in the databases reported by EDR. Therefore, it is the opinion of Michael Baker that past adjoining rural residential uses have not resulted in a REC at the time of this Phase I ESA.

#### **6.4.3 Transportation Uses**

Unimproved roads and Jewel Valley Road have adjoined the subject property from at least 1939 to present day. Additionally, the San Diego and Imperial Valley Railroad (later labeled as the San Diego and Arizona Eastern Roadway) adjoined Area F to the south and Area G to the north by 1939. Roadways are not typically associated with the handling/storage or transport of hazardous materials. Although railroads are typically associated with the use of pesticides and arsenic, the off-site use of such chemicals of concern are not anticipated to have adversely impacted soil gas or groundwater at the subject property. Therefore, it is the opinion of Michael Baker that past adjoining transportation uses have not resulted in a REC at the time of this Phase I ESA.

#### **6.4.4 Ranching Operations**

The Empire Ranch property (1758 Jewel Valley Road) has adjoined Area A to the southwest and Area B to the northwest from at least 1984 to present day. Based on a review of historic aerial photographs, several ancillary structures appeared to have been constructed and removed from

approximately 1989 to 2009. During Michael Baker's review of historic documentation, no conditions indicative of RECs were noted with respect to the Empire Ranch property. Further, the property has not been under investigation for violation of any environmental laws, regulations, or standards, as identified in the databases reported by EDR. Therefore, it is the opinion of Michael Baker that historic adjoining ranching operations have not resulted in a REC at the time of this Phase I ESA.

#### **6.4.5 Walker Deposit**

Based on the EDR report, the Walker Deposit adjoined the on-site landing strip to the south. The facility was listed in EDR's MINES MRDS database, which reported mining activities in 1976 and 1991. Primary commodities reported include quartz, and tertiary commodities reported include silica. Based on Michael Baker's review of historical documentation and locational information provided by EDR, mining activities associated with the Walker Deposit may have been conducted at the hill adjoining Area C to the east. Portions of the hill appeared to have been disturbed/cleared of vegetation by 1975, and several small structures and debris were noted to the south of the hill from at least 1984 to 2009. As such, it does not appear that on-site mining activities occurred on Area C, and it is therefore Michael Baker's opinion that no REC has resulted in this regard.

#### **6.4.6 Risley Burroughs Deposit/Risley Deposit**

Based on information provided by EDR, the Risley Burroughs Deposit/Risley Deposit was listed in the MINDES MRDS database, which indicated mining activities were reported in the southern portion of Area G in 1982 and 1991. Primary commodities reported included quartz and silica. Based on Michael Baker's review of historical resources and June 20, 2023 site inspection, no indications of former on-site mining were apparent. Based on a review of historic aerial imagery, a lake or disturbed area appeared to adjoin Area G to the west by 1975. An additional lake or disturbed area was apparent further to the south by 1984. Based on the lack of evidence suggesting Area G is associated with former mining activities and the proximity of the lakes or disturbed areas to the locational information provided by EDR, it is possible the lakes or disturbed areas are associated with mining activities as reported by EDR. For these reasons, it does not appear that on-site mining activities occurred on Area G, and it is therefore Michael Baker's opinion that no REC has resulted in this regard.

### **6.5 CURRENT AND PAST ADJACENT USES**

Based on the available documentation reviewed and a site inspection conducted as part of this Phase I ESA, current and past adjacent uses consist of rural residential uses, ranching operations,

commercial uses, mining activities, transportation uses, various public service facilities (e.g., San Diego County Sheriff's Department, San Diego County Fire Station 47), state government uses (Caltrans Department; 40905 Old Highway 80), and vacant land uses. Vacant land is not typically associated with the handling/storage or transport of hazardous materials. Although two adjacent properties were listed in regulatory databases searched by EDR, no reported adjacent regulatory properties have been identified that also present a potential concern to groundwater underlying the subject property. Reported adjacent regulatory properties are considered to have a low potential of affecting the subject property for one or more of the following reasons: distance from the subject property, direction of anticipated groundwater flow, site status, and/or no contamination has been reported. As such, it is the opinion of Michael Baker that current and past adjacent land uses have not resulted in a REC at the time of this Phase I ESA.

## 6.6 DATA GAPS

A data gap is a lack of or inability to obtain information required by the ASTM E 1527-21 Standard Practice despite good faith efforts by the Environmental Professional to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice, including but not limited to site reconnaissance (for example, an inability to conduct the site inspection) and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.). A data gap by itself is not inherently significant. For example, if a property's historical use is not identified back to 1940 because of data failure, but the earliest source shows that the property was undeveloped, this data gap by itself would not be significant. A data gap is only significant if other information and/or professional experience raises reasonable concerns involving the data gap. For example, if a building on the property is inaccessible during the site inspection, and the Environmental Professional's experience indicates that such a building often involves activity that leads to an REC, the inability to inspect the building would be a significant data gap warranting comment.

No significant data gaps were noted during the course of the Phase I ESA. Refer to Section 7.2, Limiting Conditions/Deviations.

# SECTION 7.0

## CONCLUSIONS

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### 7.1 CONCLUSIONS

Michael Baker has performed a Phase I ESA in conformance with the scope and limitations of ASTM E 1527-21 Standard Practice of Areas A through G of the Boulevard Starlight Solar project (Assessor's Parcel Numbers 612-082-12; 612-090-59 and -68; 612-110-02, -04, and -17 through -19; 612-120-01; 659-020-01, -02, -05, and -06; and 659-080-02 and -08), in Boulevard, California, the subject property. Any exceptions to, or deletions from, this practice are described in Section 7.2, Limiting Conditions/Deviations, of this Phase I ESA. This Phase I ESA has revealed the following evidence of RECs in connection with the subject property:

- **On-site railroad tracks at Area G** – Based on a review of historic documentation, a portion of the San Diego Eastern Railway (later named the San Diego and Imperial Valley Railroad) was apparent on the proposed access road to Area G by 1939. The railroad is no longer operational. Railroad tracks are typically associated with the use of pesticides and arsenic and the presence of gasoline, diesel, and/or creosote underneath and surrounding the railroad is likely. Therefore, it is Michael Baker's opinion that the former on-site railroad track is considered a REC at the time of this Phase I ESA.

### 7.2 LIMITING CONDITIONS / DEVIATIONS

Due to the size of the subject property and areas of undeveloped brush, Michael Baker's observation of the subject property was conducted primarily as a drive-by survey on June 20, 2023. As such, limited visibility was present for various areas of the subject property. Based on a review of available sources discussed throughout this Phase I ESA, no indication of current or past activities were noted for any areas of limited visibility. Therefore, it is the opinion of Michael Baker that limiting condition is not a significant data gap.

A local government official was not interviewed during the course of this Phase I ESA. Based on a review of available sources discussed throughout this Phase I ESA, it is Michael Baker's opinion that such an interview would not increase the knowledge of the Environmental Professional such that the conclusions of the Phase I ESA would change. Therefore, it is the opinion of Michael Baker that this limiting condition is not a significant data gap.

No other limitations, deviations, or exceptions were encountered during the preparation of this Phase I ESA. Further, no additional scope items, or items outside of the scope of a Phase I ESA E 1527-21 Standard Practice, were conducted as part of this Phase I ESA.

## **7.3      ADDITIONAL SERVICES**

No additional scope items, or items outside of the scope of a Phase I ESA E 1527-21 Standard Practice, were conducted as part of this Phase I ESA.

# SECTION 8.0

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# APPENDICES