

APPENDIX I

Phase I Environmental Site Assessment

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT



**NORTH RIVER PROJECT
297 WILSHIRE ROAD
OCEANSIDE, CALIFORNIA**

PREPARED FOR:

**NRF PROJECT OWNER, LLC
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Project No. 09956-06-03
July 21, 2016

NRF Project Owner, LLC
2235 Encinitas Boulevard, Suite 216
Encinitas, California 92024

Attention: Ms. Ninia Hammond

Subject: PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT
NORTH RIVER PROJECT
297 WILSHIRE ROAD
OCEANSIDE, CALIFORNIA

Dear Ms. Hammond:

In accordance with your request, and our Proposal No. EP-16030, dated June 15, 2016, we have performed a Phase I Environmental Site Assessment (ESA) for the subject property located in Oceanside, California. The Site is further identified by San Diego County Assessor's Parcel Number 157-100-72.

This Phase I ESA was performed as part of NRF Project Owner, LLC due diligence to assess the potential for existing hazardous substances or petroleum product impacts at the Site. This report summarizes the findings of our previous Phase I ESA and our Phase II ESA both dated October 27, 2014.

We appreciate the opportunity to have performed this Phase I ESA for NRF Project Owner, LLC. Please contact us if you have any questions concerning this report or if we may be of further service.

Very truly yours,

GEOCON INCORPORATED

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PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

1. INTRODUCTION

This report presents the results of a Phase I Environmental Site Assessment (ESA) of a 176.63-acre property located at 297 Wilshire Road (the Site) in Oceanside, California. The Site is further identified as San Diego County Assessor's Parcel Number 157-100-72. This report summarizes the findings of our previous Phase I ESA and our Phase II ESA both dated October 27, 2014.

1.1 Purpose

The purpose of the Phase I ESA was to identify evidence or indications of 'recognized environmental conditions' (REC) as defined by the American Society for Testing and Materials (ASTM) *Designation E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. Section 1.1.1 of ASTM Designation E 1527-13 defines an REC as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions." De minimis conditions are those that generally do not present a threat to human health or the environment and that generally would not be the subject of the enforcement action if brought to the attention of appropriate governmental agencies.

ASTM *Designation E 1527-13* also defines 'Historical' and 'Controlled' RECs. They define an 'Historical REC' as "A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)." ASTM defines a 'Controlled REC' as "a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)." An HREC is not a REC if the release meets current standards for unrestricted residential use. A CREC remains a REC by definition because it does not meet the unrestricted residential use requirement unconditionally.

We also conducted the Phase I ESA in general accordance with the requirements of 40 Code of Federal Regulations (CFR) Part 312 titled *Standards and Practices for All Appropriate Inquiries*, as required under Sections 101(35)(B)(ii) and (iii) of the Comprehensive Environmental Response, Compensation,

and Liability Act (CERCLA). The purpose of conducting an all appropriate inquiries investigation into the previous ownership and uses of a property is to meet the provisions necessary for the landowner, contiguous property owner, and/or bona fide prospective purchaser to qualify for certain landowner liability protections under CERCLA.

The following principles are an integral part of ASTM Designation E1527-13:

- **“Uncertainty Not Eliminated** - No environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and this practice recognizes reasonable limits of time and cost.”
- **“Not Exhaustive** - All Appropriate Inquiries does not mean an exhaustive assessment of a property. There is a point at which the cost of information obtained or the time required to gather it outweighs the usefulness of the information and, in fact, may be a material detriment to the orderly completion of transactions. One of the purposes of this practice is to identify a balance between the competing goals of limiting the costs and time demands inherent in performing an environmental site assessment and the reduction of uncertainty about unknown conditions resulting from additional information.”
- **“Level of Inquiry is Variable** – Not every property will warrant the same level of assessment. Consistent with good commercial and customary practice, the appropriate level of environmental site assessment will be guided by the type of property subject to assessment, the expertise and risk tolerance of the user, and the information developed in the course of the inquiry.”

1.2 Scope of Services and Objectives

We performed the scope of services outlined in our Proposal No. EP-16030 dated June 15, 2016 with the exception of a review of Sanborn Maps which do not exist for the Site according to Environmental Data Resources, Inc. (EDR).

The main components of the Phase I ESA and their objectives, as specified by the referenced standards, include the following:

- **Physical Setting:** we reviewed physical setting references to obtain information concerning the topographic, geologic, and hydrogeologic characteristics of the Site and vicinity. Such information may be indicative of the direction and/or extent that a contaminant could migrate in the event of a spill or release.
- **Regulatory Agency Records Review:** we reviewed regulatory agency records to obtain information that could potentially help identify RECs at or potentially affecting the Site. We reviewed publicly available Federal, State, and local regulatory agency records for the Site.

- **Site History:** we reviewed historical references to assess the previous uses of the Site and surrounding area to identify those that could have led to RECs on or near the Site. Historical sources reviewed included aerial photographs, topographic maps, and city directories. In addition, we conducted interviews with persons who were expected to be reasonably knowledgeable about historical and/or current conditions at and uses of the Site.
- **Site Reconnaissance:** we performed a site reconnaissance to observe site conditions and activities for indications of evidence of RECs. The site reconnaissance was for the Site only. Offsite properties and features were viewed solely from the vantage of the Site and public thoroughfares.

1.3 Report Limitations

We prepared this Phase I ESA report exclusively for the Client. The information obtained is only relevant for the dates of the records reviewed or as of the date of the latest site visit. Therefore, the information contained herein is only valid as of the date of the report and will require an update to reflect recent records/site visits.

The Client should recognize that this report is not a comprehensive site characterization and should not be construed as such. The findings and conclusions presented in this report are predicated on the site reconnaissance, a review of the specified regulatory records, and a review of the historical usage of the Site, as presented in this report. The Client should also understand that wetlands, lead in drinking water, radon, mercury related to mining activities, and methane surveys were not included in the scope of services for this Phase I ESA. Assessment for potential naturally occurring hazards such as asbestos and arsenic was also not included.

Therefore, the report should only be deemed conclusive with respect to the information obtained. No guarantee or warranty of the results of the Phase I ESA is implied within the intent of this report or any subsequent reports, correspondence or consultation, either express or implied. We strived to conduct the services summarized herein in accordance with the local standard of care in the geographic region at the time the services were rendered.

1.4 Data Gaps

ASTM Designation E 1527-13 defines a data gap as “a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information.” Data gaps could include such things as insufficient historical information, the inability to interview persons with direct site knowledge (e.g., the owner(s), past owner(s), tenants, workers, etc.) or the lack of access to all parts of a site during the site reconnaissance. No significant data gaps were identified during the performance of this Phase I ESA.

2. SITE DESCRIPTION

This section provides information regarding the location and physical characteristics of the Site including its size, topography, geologic, soil, and hydrogeologic conditions.

2.1 Location and Legal Description

The 176.63-acre Site is located at 297 Wilshire Road in Oceanside, California (see *Vicinity Map*, Figure 1). The Site is further identified as County of San Diego Assessor's Parcel Number (APN) 157-100-72 (see Parcel Maps in Appendix A).

The Site is depicted at the intersection of Sections 34 and 35 of Township 10 South and Sections 2 and 3 in Township 11 South, Range 4 West, San Bernardino Base and on the United States Geological Survey's (USGS) *Morro Hill, 7.5-minute Topographic Map* (USGS, 1968).

2.2 Site and Vicinity General Characteristics

The Site is developed for agricultural purposes. North River Road bisects the Site from the east boundary to the southwest corner. A portion of Wilshire Road extends across the northern portion of the Site to provide access to a ranch located to the northwest. The vicinity includes a mix of agricultural, residential and recreational land uses.

2.2.1 Topography

The Site consists of gentle undulating topography that generally drains from north to south towards the San Luis Rey River that flows from east to west near the southern boundary. According to the USGS *Morro Hill, California, 7.5-minute Topographic Map* (USGS, 1968), elevations at the Site range from approximately 240 feet above mean sea level (MSL) in the north to approximately 100 feet above MSL in the south.

2.2.2 Geologic Conditions

The Site is located in the Peninsular Ranges geomorphic province of Southern California (Norris and Webb, 1990). This geomorphic province encompasses an area that extends 900 miles from the Transverse Ranges and the Los Angeles Basin south to the tip of Baja California. In general, the province consists of rugged mountains underlain by Mesozoic igneous and metamorphic rocks to the east, and a dissected coastal plain underlain by Cenozoic sediments to the west. The province varies in width from approximately 30 to 100 miles, and is traversed by a group of faults and fault zones trending roughly northwest.

The *Geologic Map of the Oceanside 30' X 60' Quadrangle, California* (Kennedy and Tan, 2005), indicates the Site is underlain by young and old Quaternary alluvial flood plain deposits, and Cretaceous-age granitic rock. The young alluvial flood plain deposits consist of unconsolidated sandy, silty, or clay-bearing alluvium. The old alluvial flood plain deposits consist of moderately well consolidated, poorly sorted, permeable, gravel, sand, silty, and clay-bearing alluvium. Granitic rock consisting of mostly massive, coarse-grained, light-gray hornblende-biotite tonalite underlies the alluvial deposits.

We obtained information concerning the soil conditions in proximity to the Site from review of the Natural Resources Conservation Service (NRCS), Soil Data Mart digital map of the Soil Survey of San Diego County, 2016 (<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>). The soil survey indicates the site soil is predominantly characterized by three soil units: Placentia sandy loam, 5 to 9 percent slopes, Tujunga sand, 0 to 5 percent slopes; and Bosanko clay, 2 to 9 percent slopes. In general, the majority of the soil on the central portion of the Site is characterized by Placentia sandy loam, which consists of sandy loam from 0 to 10 inches, sandy clay from 10 to 32 inches, clay loam and sandy clay loam from 32 to 60 inches. The majority of the soil on the southeastern and southwestern portions of the Site is characterized by Tujunga sand, which consists of sand from 0 to 14 inches, loamy sand, fine sand, and sand from 14 to 34 inches, and stratified gravelly sand to gravelly loamy sand from 34 to 60 inches. The northern portion of the Site is mainly characterized by Bosanko clay, which consists of clay from 0 to 23 inches, sandy clay loam and clay loam from 23 to 28 inches and weathered bedrock below 28 inches.

2.2.3 Hydrologic and Hydrogeologic Conditions

San Luis Rey River is located near the southeastern, southern, and southwestern boundaries of the Site which flows to the Pacific Ocean, approximately seven miles west of the Site.

We reviewed information pertaining to groundwater quality and occurrence in the vicinity of the Site available from the California State Water Resources Control Board (SWRCB). The SWRCB information indicated the Site is located in the Mission Hydrologic Sub Area (903.11) of the Lower San Luis Hydrologic Area (903.10) within the San Luis Rey Hydrologic Unit (903.00) (SWRCB, 1995). The SWRCB Basin Plan reports that groundwater occurring within the San Luis Hydrologic Area has existing beneficial uses for municipal, agricultural, and industrial service supply purposes. The SWRCB Basin Plan reports that the surface water has existing beneficial uses for agricultural, industrial, contact water recreation, warm freshwater habitat, and wildlife habitat (SWRCB, 2016).

According to our report, *Preliminary Geotechnical Feasibility Study, North River Farms*, dated September 5, 2014 (Project No. G1753-32-01), groundwater or seepage was encountered at depths ranging from 8 to 10 feet. Based on the local topography, groundwater is expected to flow to the south toward the San Luis Rey River.

2.3 Current and Planned Uses of the Site

The southern portion of the Site, south of North River Road, is currently used to cultivate tomatoes while the remainder of the Site, north of North River Road, consists of tilled fields and vacant structures. We understand the proposed plans consist of redeveloping the Site as residential.

2.4 Descriptions of Structures, Roads, Other Improvements on the Site

Several vacant dilapidated single-family structures, a single-family residence converted into an office building, storage structures, a transfer facility, an equipment maintenance area, abandoned greenhouses and a former water filtration facility are located in the northern and central portions of the Site. Two lined retention basins located along Wilshire Road are used to collect surface water runoff on the northern portion of the Site. Drainage ditches direct runoff to the San Luis Rey River to the southeast, south, and southwest of the Site. A network of unimproved roads provides access to agricultural fields. North River Road bisects the Site from east to west and a portion of Wilshire Road extends across the northern portion of the Site. Further description of the Site is presented in Section 6.

2.5 Current Uses of Adjoining Properties

The Site is surrounded by rural residential, agricultural and ranch land, a golf course to the northwest, and the San Luis Rey River to the south.

3. USER-PROVIDED INFORMATION

This section provides responses to inquiries made to Ms. Ninia Hammond with NRF Project Owner, LLC for site information. A user questionnaire completed by Ms. Hammond is in Appendix B.

3.1 Title, Appraisal and Sale Agreement Records

Ms. Hammond did not provide an updated title report, appraisal or sale agreement records for our review. In our previous Phase I ESA no environmental liens were listed on the preliminary title report dated April 25, 2014.

3.2 Environmental Liens or Activity and Use Limitations

Ms. Hammond stated that she is not aware of any environmental liens or activity and use limitations for the Site.

3.3 Specialized Knowledge

Ms. Hammond indicated she has no specialized knowledge of the Site.

3.4 Commonly Known or Reasonably Ascertainable Information

Ms. Hammond stated that she is aware of our previous Phase I ESA report prepared for the Site.

3.5 Owner, Property Manager, and Occupant Information

Ms. Hammond indicated that the Self Realization Fellowship and Singh Farming currently own, manage, and operate the Site. Pertinent information from the interview and site owner questionnaire is presented in Section 7.

3.6 Valuation Reduction for Environmental Issues

According to Ms. Hammond, the value of the Site has not been reduced due to environmental issues associated with the Site or adjacent properties.

3.7 Reason for Performing Phase I ESA

The Phase I ESA was requested by Ms. Hammond as part of their due diligence prior to purchasing and developing the Site.

4. RECORDS REVIEW

This section summarizes our review of readily available agency records for the Site and properties in the surrounding vicinity.

4.1 Standard Environmental Record Sources

Environmental Data Resources, Inc. (EDR) performed a search of federal, state, and local databases for the Site and surrounding area. The search distance for the review extended one mile from the Site. A copy of the report entitled *The EDR Radius Map Report with GeoCheck*, dated June 16, 2016, is in Appendix C.

4.1.1 Site

The Site is referenced on the San Diego Co. HMMD, HAZNET and AST databases as Herb Thyme Farms.

- The San Diego Co. HMMD database lists the Site with the Facility I.D. 199164 and indicates the last inspection occurred on November 21, 2011; no violations were noted.
- The HAZNET database reports approximately 0.250-tons of an unspecified waste identified as “Storage, Bulking, And/Or Transfer Off Site-No Treatment/Recovery,” and 0.4587-tons of “Other Recovery of Reclamation for Reuse Including Acid Regeneration, Organics Recovery Act” were disposed of in 2012. In addition, the HAZNET database indicates 2.25-tons of “Unspecified oil-containing waste” and 0.627-tons of “Storage, Bulking, And/Or Transfer Off Site-No Treatment/Recovery” were disposed of in 2011.
- The AST database lists the Site as storing 1,680 gallons of petroleum products. No further information is provided.

The EDR report lists Green House, Fine Herbs located at 5451 North River Road and plots the facility 211 feet west of the Site. However, it appears this former address is associated with the southern portion of the Site south of North River Road. This address is referenced on the SLIC, LDS and ENF databases as Green House, Fine Herbs.

- The SLIC database lists the Site with the Global I.D. SL209244199 and a status of “Completed-Case Closed” as of April 29, 1997. No other pertinent details are provided.
- The LDS database lists the facility with the global I.D. L10006610422 and a status of “Completed-Case Closed” as of April 1, 1997. No other pertinent details are provided.
- The ENF database reports the agricultural property is owned by the Self Realization Fellowship as a privately owned business and indicates the Site with the Facility I.D. 227862. No other pertinent details are provided.

4.2 Offsite Properties

One property listed in the EDR report is located within 1/8 mile from the Site. The property is located at 306 Wilshire Road and is identified as Milagro Ranch, LLC. in the AST database for a 2,775-gallon AST. No other information is provided.

4.2.1 Orphan Summary

The EDR report includes an Orphan Summary that identifies properties that have incomplete address information and therefore could not be accurately plotted. The Orphan Summary lists four properties that appear to be greater than one mile from the Site. Based on the distances of these properties from the Site and the databases reported, no adverse impact to the Site is expected.

4.3 Additional Environmental Record Sources

We performed a search of additional readily available environmental record sources including the SWRCB GeoTracker and the California Department of Toxic Substances Control (DTSC) EnviroStor website databases for properties/facilities within approximately one mile of the Site. Our findings are summarized in the following subsections.

4.3.1 GeoTracker and EnviroStor Websites

We reviewed information concerning permitted facilities, environmental investigations, and remediation projects regulated by the California Regional Water Quality Control Board (RWQCB) and the DTSC on GeoTracker and EnviroStor, respectively. No facilities located within approximately ¼-mile of the Site were identified in GeoTracker or EnviroStor that would be expected to have significant adverse impact to the Site.

4.3.2 State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources

We reviewed the State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) online mapping system for information regarding the location and status of any oil or natural gas exploration or production at or in the vicinity of the Site. The DOGGR online mapping system shows no oil or gas wells within one-mile of the Site (DOGGR, 2016).

4.3.3 County of San Diego Department of Agriculture, Weights and Measures

We submitted a request to the County of San Diego, Department of Agriculture, Weights and Measures (DAWM), Pesticide Use Enforcement Division for records of possible use of restricted pesticides/herbicides at the Site. The Department maintains such records for approximately four years. According to DAWM, pesticides are used in an agricultural setting at the Site. The records indicate

Rocket Farms Herbs, Inc. currently operates under the permit number 37P8084 for the application of pesticides/herbicides for the period of 2013 to the present. Older records are not available.

4.3.4 San Diego Air Pollution Control District

We submitted a request to the San Diego Air Pollution Control District (APCD) for records pertaining to the Site. The APCD provided a copy of an “Application for Permit to Burn,” dated January 14, 2013. The permit was approved for a one-month period. No further pertinent information is provided.

4.3.5 County of San Diego Department of Environmental Health

We submitted a request to DEH for records pertaining to the Site. According to the DEH, there are no records on file for the APN associated with the Site.

4.4 Previous Environmental Documents

We conducted a Phase I ESA of the Site in October 2014. The Phase I ESA identified RECs on the Site related to gasoline, diesel and oil ASTs, a potential release of ethylene glycol, potential impact of metals to soil within an outdoor welding area, and the potential for residual pesticides in soil from historical and current agricultural use. We also summarized the *Draft Environmental Impact Report (EIR)* performed by Mooney and Associates dated February 2003, which recommended a complete soil and soil vapor assessment be performed at the Site.

To further evaluate the identified RECs, we conducted limited soil sampling that included advancing sixty soil borings across the Site and collecting discreet soil samples at depths of 0.5 and 2 feet for pesticide and arsenic analysis. Nine additional borings were advanced to further evaluate pesticide impacts at the reported location of a former chemical storage building identified in the EIR. Furthermore, we advanced six borings in the transfer facility equipment storage yard to evaluate identified RECs in relation to the welding area, ASTs and potential ethylene glycol release.

We also performed a soil vapor survey in the transfer facility equipment storage yard to assess the presence of VOCs in soil vapor. Soil vapor samples were collected in the vicinity of soil vapor samples reported in the EIR.

We compared the detected OCP concentrations to the California Human Health Screening Levels (CHHSLs) for residential land use. Detected concentrations of OCPs in the soil samples did not exceed their respective residential CHHSLs.

Arsenic was detected in the soil samples collected from the agricultural areas at concentrations exceeding the residential CHHSL. However, the arsenic concentrations were well below the DTSC’s regional background level for arsenic in Southern California soil.

The analytical results for soil and soil vapor samples collected from the transfer facility equipment storage yard and the results of our potential health risk evaluation show that this portion of the Site had not been or was no longer impacted by petroleum hydrocarbons, VOCs, Title 22 metals, or ethylene glycol at concentrations that were considered detrimental to human health or the environment. As such, we concluded further assessment of these compounds is not warranted.

5. HISTORICAL USE

This section summarizes information obtained from a variety of sources regarding the historical uses of the Site and identifies historical uses that could have led to RECs. The sources of information included Sanborn fire insurance map search, historical aerial photographs, historical topographic maps, and an abstract of city directories provided by EDR.

5.1 Sanborn, Inc. Fire Insurance Maps

Sanborn maps do not exist for the Site or site vicinity.

5.2 Aerial Photographs

Historical aerial photographs provided by EDR for the years 1946, 1953, 1963, 1974, 1980, 1990, 1994 (4), 2005 (4), 2009 (4), 2010 (4), and 2012 (4) (Appendix D) were reviewed for indications of past land uses that had the potential to have impacted the Site through the use, storage or disposal of hazardous substances and/or petroleum. The following table summarizes the observations of the Site and adjacent properties on the aerial photographs.

AERIAL PHOTOGRAPH REVIEW SUMMARY

Year	Observations	
	Site	Adjacent Properties
1946 (1" = 700')	The Site appears to have been used as agricultural land. North River Road extends across the Site from east to west. Several structures, and a network of unimproved roads were present on the southern portion the Site. Several structures and an orchard were on the northern portion of the Site. The majority of the Site appeared to be used for agricultural purposes. A stand of trees is located in the central portion of the Site.	An unimproved road was adjacent to the north eastern Site boundary with rural residential beyond. Other adjacent properties were used for agricultural purposes. Undeveloped land and agricultural land was adjacent to the southwest, south, and southeast of the Site with the San Luis Rey River beyond.

Year	Observations	
	Site	Adjacent Properties
1953 (1" = 700')	The network of unimproved roads on the southern portion of the Site was absent. The Site appears similar to that observed in the 1946 aerial photograph.	The adjacent properties appear similar to that observed in the 1946 aerial photograph.
1963 (1" = 700')	The portion of the Site north of North River Road appears to have been as an orchard. Otherwise, the Site appears similar that observed in the 1953 aerial photograph.	Several elongate structures were present on the adjacent property northwest of the Site. Other adjacent properties appear similar to that observed in the 1953 aerial photograph.
1974 (1" = 700')	The Site appears similar to that observed in the 1963 aerial photograph.	Additional elongate structures were present on the adjacent property northwest of the Site. Land in the vicinity west of the Site appears to be partially graded for a residential neighborhood. Otherwise, adjacent properties appear similar to that observed in the 1963 aerial photograph.
1980 (1" = 700')	The majority of the Site appeared to be developed as multiple crop plots. An area on the east-central portion of the Site appeared to be developed with a structure and used as an equipment storage yard.	Residential developments and additional elongate structures were west of the Site.
1990 (1" = 700')	The Site appears similar to the 1980 aerial photograph.	Residences were constructed on the southern graded lots. Land use of the adjacent properties appears similar to that observed in the 1980 aerial photograph. The San Luis Rey River to the southeast of the Site was flooded.
1994 (1" = 500')	The Site appears to be developed with multiple crop plots with temporary greenhouses and associated structures. A structure is located in the equipment storage area on the western portion of the Site. The southern corner of the Site appears to be undergoing additional grading.	Residential neighborhoods are in the site vicinity to the west, southwest and southeast. A man-made lake is beyond the residential neighborhood southeast of the Site. The remaining adjacent properties appear similar to that observed in the 1990 aerial photographs.
2005 (1" = 500')	Additions were made to the structure in the equipment storage yard. Otherwise, the Site appears similar to that observed in the 1994 aerial photograph.	Elongate structures west of the northern portion of the Site were absent. A golf course was located northwest of the Site. Additional residential development was west of the golf course northeast of the Site. Adjacent and vicinity properties appear to have been used for agricultural purposes with associated structures.
2009 (1" = 500')	The Site appears similar to that observed in the 2005 aerial photograph.	Continued residential development was west of the golf course northeast of the Site. Otherwise, the adjacent and vicinity properties appear similar to that observed in the 2005 aerial photograph.

Year	Observations	
	Site	Adjacent Properties
2010 (1" = 500')	The Site appears similar to that observed in the 2009 aerial photograph.	Continued residential development was west of the golf course northeast of the Site. Otherwise, the adjacent and vicinity properties appear similar to that observed in the 2009 aerial photograph.
2012 (1" = 500')	The Site appears similar to that observed in the 2010 aerial photograph.	Continued residential development was west of the golf course northeast of the Site. Otherwise, the adjacent and vicinity properties appear similar to that observed in the 2010 aerial photograph.

The Site was used for agricultural purposes from as early as 1946 to at least 2012. Agricultural use of the Site is further discussed in section 4. 4.

5.3 Topographic Maps

Historical topographic maps provided by EDR for the years 1901, 1904, 1942, 1949, 1950, and 1968 (Appendix E) were reviewed. The following table summarizes the observations of the Site and adjacent properties on the historical topographic maps.

TOPOGRAPHIC MAP REVIEW SUMMARY

Year	Observations	
	Site	Adjacent Properties
1901 (1:125,000)	The majority of the Site is depicted within an area designated as Guajome and an adjacent portion to the north. One structure is depicted on the northern portion adjacent to an improved road and one structure is depicted adjacent to an improved road in the central portion of the Site. An improved road is depicted extending across the Site from the east to west. The remainder of the Site is depicted as undeveloped land.	The adjacent properties are depicted as rural residential with associated improved roads and undeveloped land. Wetlands and the San Luis Rey River are depicted to the southwest, south, and southeast of the Site.
1904 (1:250,000)	It is difficult to determine the land use on the Site based on the scale of the topographic map.	It is difficult to determine the land use on adjacent properties based on the scale of the topographic map.

Year	Observations	
	Site	Adjacent Properties
1942 (1:62,500)	One structure is depicted in the northern portion of the Site. An improved road is depicted extending across the Site from the east to west as a secondary highway. A turnout is depicted on the Site adjacent to the eastbound side of the improved road in the central portion of the Site. The remainder of the Site is depicted as undeveloped land and wetlands along the San Luis Rey River.	The adjacent properties are depicted as rural residential with associated improved and unimproved roads and undeveloped land. Wetlands are depicted to the northwest and west of the Site. Foss Lake and Whalen Lake are depicted west of the Site.
1949 (1:24,000)	The majority of the Site is depicted within an area designated as Guajome and an adjacent portion to the north. One structure in the northern portion adjacent to an unimproved road and seven structures adjacent to Fallbrook Road in the central portion of the Site. Fallbrook Road is depicted extending across the Site from the east to west. The remainder of the Site is depicted as undeveloped land and wetlands along the San Luis Rey River.	Adjacent properties are depicted similarly to the 1942 topographic map.
1950 (1:50,000)	The Site is depicted similarly to the 1949 topographic map.	Adjacent properties are depicted similarly to the 1949 topographic map.
1968 (1:24,000)	Two additional structures are depicted in the northern portion of the Site. An unimproved road is depicted extending south across the Site to an improved road that extends across the northern portion of the Site. Fallbrook Road is labeled as North River Road. The majority of the Site north of North River Road is depicted as an orchard. Five structures are depicted in the central portion of the Site south of North River Road. Otherwise, the Site is depicted similarly to the 1950 topographic map.	Several structures and a small body of water are depicted adjacent west of the Site. A well and a windmill are depicted along the San Luis Rey River south of the Site. A residential neighborhood is depicted in the vicinity west of the Site. Otherwise, adjacent properties are depicted similarly to the 1950 topographic map.

Review of the topographic maps indicates that an orchard existed at the Site. Agricultural use of the Site is further discussed in section 4. 4.

5.4 City Directory

EDR prepared an abstract of cross-reference directories reviewed at approximately 5 year intervals from 1903 through 2013 (Appendix F). Addresses associated with the Site were identified in directories from 1970 through 2008 and adjoining properties from 1965 to 2013. The following table summarizes the directory research information provided by EDR.

HISTORICAL DIRECTORY RESEARCH SUMMARY

Addresses	Directory Listing or Use	Years
Target Property		
297 Wilshire Road	Agriventures USA Inc.	2008
	No Current Listing	2006
	Residential	1970 to 1991
Adjacent Properties		
280 Wilshire Road	Residential	1970
284 Wilshire Road	Residential	2006
292 Wilshire Road	Residential	1985 – 2006
296 Wilshire Road	Residential, No Current Listing	2000, 2006
300 Wilshire Road	No Current Listing	2006
304 Wilshire Road	No Current Listing	2000, 2006
306 Wilshire Road	Agricultural	1995 – 2013
307 Wilshire Road	Residential, Agricultural	1970 – 1991, 2000–2013
321 Wilshire Road	Residential, Commercial, Agricultural	1991–1995, 2000–2008, 2013
333 Wilshire Road	Residential, No Current Listing	1985 – 2000, 2006
360 Wilshire Road	Residential	1991 – 2006
280 Wilshire Road North	Residential	1965

Review of the information provided by EDR suggests that commercial agricultural operations were present at the Site during the time period researched. Commercial nurseries and residential were also present on adjacent properties during the time period researched. Agricultural use of the Site is further discussed in section 4. 4.

6. SITE RECONNAISSANCE

This section summarizes observations of the Site and surrounding properties made during the site reconnaissance.

6.1 Methodology and Limiting Conditions

Mr. Sean Keffer, Senior Staff Geologist with Geocon, performed the site reconnaissance on July 7, 2016. We were not provided access to the single-family residence located at 297 Wilshire Road or into the interior of the dilapidated structures whose structural integrity or access was questionable. The offsite survey was performed by observing adjacent properties from the Site and adjacent public streets. Weather on the day of the site reconnaissance was partly cloudy with temperatures in the mid-70s. Photographs of various site features and offsite properties are appended. Locations and orientations of photographs of selected site features are shown on the *Site Plan*, Figure 2 and *Detail "A"*, Figure 3.

6.2 General Site Setting

The Site is bounded to the northeast, north and west by rural residential and agricultural properties, to the northwest by a golf course, a church, and rural residential. Adjacent properties to the southwest, south and southeast are utilized for agricultural purposes with the San Luis Rey River beyond. In general, the Site is located in a rural area with agricultural, rural residential, and residential neighborhoods.

6.3 Onsite Survey

The Site consists of agricultural land with vacant dilapidated single-family structures located on the northern portion and central portions (Photograph Nos. 1 through 3). Additional vacant structures include a single-family residence converted into an office building, storage structures, and a transfer facility (Photograph Nos. 4 and 5). A water filtration facility with an associated lined pond and concrete foundation of a former approximately 250,000-gallon water tank are located in the central portion of the Site (Photograph Nos. 6 and 7). A network of unimproved roads and an irrigation system extend throughout the Site. Vacant temporary greenhouses were observed on the northern portion of the Site (Photograph No. 8). The portion of the Site south of North River Road is currently used to cultivate tomatoes (Photograph No. 9). The remainder of agricultural land at the Site consists of tilled fields (Photograph Nos. 1 and 2).

A vacant transfer facility is located on the east-central Site boundary consists of a refrigerated storage building, a loading dock, and storage rooms (Photograph Nos. 5, 10 and 11). Two concrete secondary containment areas formerly housing fuel and oil ASTs are located south of the transfer facility (Photograph Nos. 12 and 13). Absorbent matrix and evidence of staining within the containment areas and adjacent soil indicative of small scale releases was observed. A former equipment repair area consisting of a covered concrete area and storage rooms is located east of the transfer facility and AST containments (Photograph

No. 14). De minimis staining was observed in the equipment repair area, a storage room and adjacent to a former fertilizer injection area on the western portion of the Site (Photograph Nos. 15 through 17). A former composting area is located north of the transfer facility (Photograph 18).

Water filtration equipment and three polyethylene storage tanks were observed on the foundation of the former approximately 250,000-gallon water tank located in the central portion of the Site (Photograph Nos. 6 and 19). Three polyethylene storage tanks were observed in a fenced area adjacent to a former water filtration facility (Photograph Nos. 6 and 20). A 250-gallon tote (labeled as containing a water surfactant) was observed near the foundation of the former water tank (Photograph Nos. 19 and 21). No evident staining indicating a release was observed adjacent to the storage tanks or tote. Two lined, desilting basins were observed along the eastern site boundary (Photograph No. 22). Vacant pesticide and chemical storage structures were identified in the central portion of the Site (Photograph Nos. 23 and 24). No evident staining indicating a release was observed within or adjacent to the pesticide and chemical storage buildings (Photograph Nos. 24 and 25). Pole-mounted electrical transformers were observed on the northern and central portions of the Site (Photograph No. 6). No evident staining indicating a release was observed adjacent to the transformers.

North River Road bisects the Site from east to west (Photograph No. 26). An unimproved section of Wilshire Road transects the northern portion of the Site from the eastern boundary to the northwest boundary (Photograph No. 27). A municipal water meter box, telecommunications and electrical services were observed at the property. Evidence of septic systems were observed at the vacant single-family residences.

6.4 Offsite Survey

Properties within the site vicinity are developed as agricultural, rural residential, residential neighborhoods, a church, and a golf course. Observations of properties adjacent to the Site are summarized below:

- **North:** Adjacent properties are developed as rural residential and agricultural (Photograph Nos. 28 and 29).
- **East:** Agricultural land and Wilshire Road are adjacent to the east with an equipment and materials yard, rural residential and agricultural beyond (Photograph Nos. 30 and 31).
- **South:** Adjacent properties are utilized as agricultural with the San Luis Rey River beyond (Photograph Nos. 32 and 33).
- **West:** Adjacent properties consist of agricultural land, undeveloped land, a church, rural residential, and a golf course (Photograph Nos. 34 through 36).

No evidence of RECs was observed on the surrounding properties.

7. INTERVIEWS

We interviewed Ms. Ninia Hammond, regarding past and present use of the Site via site owner questionnaire (Appendix B).

Ms. Hammond indicated that the only information she was aware of regarding the Site was presented in our previous Phase I ESA, dated October 27, 2014 and summarized in Section 4.4.

Ms. Hammond did not provide any additional information regarding the Site.

8. CONCLUSIONS AND RECOMMENDATIONS

We have performed a Phase I ESA, in general conformance with the scope and limitations of ASTM E 1527-13, on the 176.63-acre Site located at 297 Wilshire Road in Oceanside, California. Exceptions to, or deletions from, this practice are described in Section 1.4 of this report.

The Phase I ESA did not identify RECs or potential environmental concerns associated with the Site or adjacent/nearby properties, and additional environmental assessment of the Site does not appear to be warranted at this time.

Any undocumented subsurface structures or areas of apparent contamination encountered during site redevelopment activities including septic tanks, USTs, wells, significant staining, buried debris, etc., should be properly removed in accordance with regulatory permit requirements.

Based upon the age of the onsite structures (approximately 70 years based on aerial photographs), the potential exists for asbestos containing material (ACM) and/or lead containing paint (LCP) to be present in structures at the Site. We recommend conducting an ACM and LCP survey prior to demolition of the onsite structures to confirm the absence or presence of these materials and to determine appropriate health and safety requirements for demolition and appropriate disposal of demolition debris.

9. REFERENCES

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United States Department of Agriculture, Natural Resources Conservation Service (NRCS),
<<http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>>, accessed June 2016.

United States Geological Survey (USGS), *Morro Hill, 7.5-minute Topographic Map*, 1968.

10. QUALIFICATIONS

This Phase I ESA report was prepared by Sean K. Keffer, and reviewed by John Juhrend, PE, CEG. We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in Section 312.10 of 40 CFR Part 312. 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. We have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Mr. Keffer is a Senior Staff geologist for Geocon and has over five years of experience in the preparation and management of Phase I ESAs, Phase II ESAs, asbestos surveys, and other site investigation activities. Mr. Keffer performs research, environmental assessments and field sampling programs for industrial sites, commercial/retail areas, residential and agricultural properties, and transportation corridors. He has a Bachelor's of Science degree in Geological Science and is a Certified Asbestos Consultant (CAC) in California.

Mr. Juhrend has over 30 years of experience in the environmental and geotechnical consulting industry in California. Mr. Juhrend is Professional Engineer and Certified Engineering Geologist, with a BS degree in engineering geology and MS degree in civil engineering. His personal experience includes the performance of hundreds of environmental projects including Phase I and Phase II site assessments, remedial investigations and feasibility studies, corrective action programs and litigation support. His primary expertise includes hazardous waste evaluations of transportation corridors, industrial, commercial and residential properties.



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NO SCALE

VICINITY MAP

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OCEANSIDE, CALIFORNIA

SKK / CW

DSK/GTYPD

DATE JULY 2016

PROJECT NO. 09956 - 06 - 03

FIG. 1

