



San Diego Gas & Electric Company 101 Ash Street, HQ13 San Diego, California 92101

## Phase I Environmental Site Assessment Sunrise Powerlink

Prepared by



engineers | scientists | innovators

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Project Number: SC0507

18 AUGUST 2009



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#### **EXECUTIVE SUMMARY**

This Executive Summary presents the results of the Phase I Environmental Site Assessment (ESA) activities performed by Geosyntec Consultants (Geosyntec) for San Diego Gas and Electric Company (SDG&E) for the "Sunrise Powerlink." The Sunrise Powerlink is a new electric transmission line project extending along an approximately 120-mile-long route between the existing Imperial Valley and Sycamore Canyon substations, a new Modified Route D Alternative (Suncrest) Substation, and other system modifications for line operations (Figure 1). The Phase I ESA was prepared in accordance with the scope of work, terms and conditions described in Geosyntec's proposal dated 1 May 2009 (proposal).

This ESA was performed to address the following Sunrise Mitigation Measures stipulated by the California Public Utilities Commission (CPUC), and the United States Bureau of Land Management (BLM):

- Mitigation Measure P-7a (step 1), "Investigate the site to determine whether it has a record of hazardous material contamination which would affect construction activities. This investigation should be performed as a Phase I ESA;"
- Mitigation Measure HS-APM-5, "All Government Code §65962.5 sites or other known contamination sites along the transmission line ROW or such sites that would affect construction work shall be investigated to determine potential impacts to the project;" and
- Mitigation Measure P-2a, "Test for residual pesticide/herbicides on currently or historically farmed land.<sup>1</sup>"

In accordance with required mitigation measure P-7a, this ESA was performed for areas where excavation or significant ground disturbance will occur during construction [CPUC, 2009]. Therefore, the primary purpose of this ESA was to identify the presence of hazardous materials or petroleum products in soil or groundwater which may be encountered during construction of towers, access roads, trenches, or in areas to be used as fly yards, storage areas, or tension sites, and as a result, may adversely affect construction, mobilize contaminants, or expose workers and the public.

#### **FINDINGS**

Sites that may require mitigation pursuant to the Sunrise Mitigation Measures are presented in Table ES-1. The results of the records review, aerial, and ground reconnaissance are summarized on Figures 2 through 13 when viewed electronically using Adobe Acrobat. In the electronic format, each identified site symbol is hyperlinked to a summary table of identified information regarding the selected site.

<sup>&</sup>lt;sup>1</sup> No sampling or testing was performed as part of this ESA. However, historical and currently farmed land identified during the ESA will be evaluated to assess the need for sampling and testing for the presence of residual pesticides and/or herbicides.

Identified sites of concern were evaluated for potential to adversely affect construction and/or require mitigation as defined by the Sunrise Mitigation Measures. During the evaluation, proposed construction activities at or near the identified sites were considered.

#### RECOMMENDATIONS FOR ADDRESSING MITIGATION MEASURES

Pursuant to the Sunrise Mitigation Measures stipulated to by the CPUC and the BLM, the following activities are recommended:

#### **Agricultural Site Sampling**

Pursuant to Sunrise Mitigation Measure P-2a, it is recommended for Site ID Nos. 12, 34, 47, 136, and 144 that soil samples be collected and tested for herbicides, pesticides, and fumigants to determine the presence of contamination within the proposed areas of construction. The sampling and testing plan should be prepared in consultation with the County Agricultural Commission, and sampling should be conducted under the direction of an appropriate California licensed professional. Samples should be sent to a California Certified laboratory for the appropriate analysis. A report documenting the areas sampled, and the process used for sampling and testing, shall be submitted to the CPUC and BLM for review and approval at least 60 days before construction. Results of the laboratory testing and recommended resolutions for handling and excavation of material found to exceed regulatory requirements shall be submitted to the CPUC and BLM (if on BLM land) 30 days prior to construction.

#### **Onsite Reconnaissance**

Pursuant to Sunrise Mitigation Measure HS-APM-5, it is recommended for Site ID No. 111 that onsite field reconnaissance be performed to evaluate the discolored soil observed in aerial photographs to determine the potential to impact the project. If apparent stained soil is confirmed during field reconnaissance, soil samples should be collected and analyzed for fuel hydrocarbons, volatile organic compounds, and metals.

#### **Construction Monitoring and Contingency Planning**

Pursuant to Sunrise Mitigation Measure P-7a, it is recommended for Site ID Nos. 78, 79, 88, 90, 103, and 104 that during excavation these sites will be monitored for impacted soils and a Contingency Plan be prepared to properly handle and dispose impacted soils, if encountered. In accordance with the Mitigation Measure, it is recommended that health and safety risk be mitigated by the preparation of site-specific health and safety plans, and work plans including soil disposal and characterization directives.

#### **Notification and Training**

Pursuant to Sunrise Mitigation Measure HS-APM-5, it is recommended for Site ID Nos. 1 and 178 that construction personnel are notified and trained on safety procedures for working in areas with a potential to contain unexploded ordinances.

# Table ES-1 Sites Requiring Mitigation Measures Phase I ESA Sunrise Powerlink



	I	I								
Geosyntec Site ID	Site Name	Site Address	Assessors Parcel Number	Owner	Current Site Use (as Observed)	Land Use Designation (From Assessors Office)	Recommended Mitigation			
Agricultural Site Sampling - Sunrise Mitigation Measure P-2a										
12	Jacumba Valley Ranch	Unknown	66002005	Jacumba Valley Ranch, C/O Karl Turecek	Row crops	Vacant and Undeveloped Land	Soil Testing			
34	Agricultural field	Unknown	52711005	Tulloch Family Partners, LP	Graded field	Field Crops	Soil Testing			
47	Agricultural field	Unknown	52401002	Cedar Ranch Investments L L C	Cleared land and hen houses	Intensive Agriculture	Soil Testing			
144	Agricultural field	Unknown	39106101	Helix Water District	Vacant	Vacant and Undeveloped Land	Soil Testing			
136	Agricultural field	Unknown	39006008	Hartung Family Trust 02-06-97	Cleared agricultural fields with structures	Field Crops	Soil Testing			
137	Agricultural field	Unknown	39006002	Digenan John J & Mildred C Family Trust 06-15-94	Mostly vacant with a trailer and fence	Vacant and Undeveloped Land	Soil Testing			
Onsite Recon	naissance - Sunrise Mitigati	ion Measure HS-APM-5								
111	Impac Ready Mix	1117 Tavern Road, Alpine, CA 91901	40338056	Dyke Thomas C Revocable Trust 12-20-01	Construction yard	Extractive Industry	Onsite reconnaissance			
Construction	Monitoring and Contingent	y Planning - Sunrise Mitigat	ion Measure P-	7a						
78	Chevron USA/ Alpine Shell	2235 Alpine Boulevard, Alpine, CA 91901	40327242	Garmo Hani & Nidhal Family Trust 07-03-01	Operating Shell service station	Service Station	Construction monitoring and contingency planning			
79	Alpine Country Station/ Texaco/Mobil/Progressive	2232 Alpine Boulevard, Alpine, CA 91901	40326219	Smith Family Trust 12-10-01	Operating Service Station	Service Station	Construction monitoring and contingency planning			
88	Alpine Equipment Rentals, Inc.	2110 Alpine Boulevard, Alpine, CA 91901	40325019	Thomas Family Trust 05-29-90	Equipment rental facility	Arterial Commercial	Construction monitoring and contingency planning			
90	Alpine Auto Center/Discount Batteries	2042 Alpine Boulevard, Alpine, CA 91901	40325028	Lepetri William Trust 06-06-07	Fence contractor yard	Arterial Commercial	Construction monitoring and contingency planning			
103	Conoco Phillips/Circle K #8581/Kayo Oil Co.	1666 Alpine Boulevard, Alpine, CA 91901	40339019	Henry Thomas J & Judy R Family Trust 08-23-99	Operating Unocal service station	Service Station	Construction monitoring and contingency planning			
104	Alpine Shell Service Station/Sterling Thomas	1340 Tavern Road, Alpine, CA 91901	40339011	Strelic Jon & Amy Family Trust 03-03-04	Vacant	Vacant and Undeveloped Land	Construction monitoring and contingency planning			
Notification (	and Training - Sunrise Mitig	ation Measure P-7a		1		1				
1	Camp Seeley Ordinance Training Center	Sections 21, 22, 27, & 28 Township 16 S, Range 11 E	15101031, 15101032, & 05101033	United States of America	Open space recreation area	Unknown	Personnel notification and training			
178	El Centro Naval Air Facility/MCAS Miramar/Former Camp Elliot	Unknown	37401101, 32503002, 32504001, 32504002, & 32506101	United States of America Military Reservation	Open space	Military Training/Open Space Park or Preserve	Personnel notification and training			

#### 1 INTRODUCTION

This report documents the results of the Phase I Environmental Site Assessment (ESA) activities performed by Geosyntec Consultants (Geosyntec) for San Diego Gas and Electric Company (SDG&E) for the "Sunrise Powerlink." The Sunrise Powerlink is a new electric transmission line project extending along an approximately 120-mile-long route between the existing Imperial Valley and Sycamore Canyon substations, a new Modified Route D Alternative (Suncrest) Substation, and other system modifications for line operations (Figure 1).

#### 1.1 Purpose

This ESA was performed to address the following Sunrise Mitigation Measures stipulated by the California Public Utilities Commission (CPUC), and the United States Bureau of Land Management (BLM):

- P-7a (step 1), "Investigate the site to determine whether it has a record of hazardous material contamination which would affect construction activities. This investigation should be performed as a Phase I ESA;"
- HS-APM-5, "All Government Code §65962.5 sites or other known contamination sites along the transmission line ROW or such sites that would affect construction work shall be investigated to determine potential impacts to the project;" and
- P-2a, "Test for residual pesticide/herbicides on currently or historically farmed land."

In accordance with Site Mitigation Measure P-7a, this Phase I ESA was performed for areas where excavation or significant ground disturbance will occur during construction [CPUC, 2009]. Therefore, the primary purpose of this Phase I ESA was to identify the presence of hazardous materials or petroleum products in soil or groundwater which may be encountered during construction of towers, access roads, trenches, or other features, or in areas to be used as fly yards, storage areas, or pull and tension sites, and as a result, may adversely affect construction, mobilize contaminants, or expose workers and the public. No sampling or testing was performed as part of this ESA. However, historical and currently farmed land identified during the ESA will be evaluated to assess the need for sampling and testing for the presence of residual pesticides and/or herbicides

The Phase I ESA was performed in general accordance with American Society of Testing and Materials (ASTM) Standard E 1527-05, "Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process," and ASTM Standard E 2247-08, "Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property." The goal of performing a Phase I ESA in accordance with ASTM Standards E 1527-05 and E 2247-08 is to identify, to the extent feasible, "Recognized

Environmental Conditions<sup>2</sup>" (RECs) within the Action Area as the "REC" term is defined by ASTM Standards E 1527-05 and E 2247-08. This REC definition eliminates from consideration several conditions that could fall under the general definition of "environmental issues" and focuses on known or potential releases of hazardous substances and petroleum products in soil or groundwater. In addition to this general limitation, specific conditions that were not considered to be within the scope of this Phase I ESA, as well as exceptions and limitations, are identified in Section 1.3 of this report.

The "Action Area" (*Subject Site* as defined by ASTM) associated with the Sunrise Powerlink project consists of approximately 3,800 acres comprising a 300-foot-wide right-of-way (ROW) for approximately 23 miles, a 200-foot-wide ROW for approximately 91 miles, and a 60-foot-wide segment for approximately 6 miles within an existing ROW. The Action Area also includes a new substation, access roads, temporary work areas, pull and tension sites, fly yards, and staging areas. The database search conservatively considered a ½-mile wide corridor centered on the proposed transmission alignment and a ¼ mile radius buffer around other features of interest within the Action Area as the target site. Therefore, database search radius distances were expanded an additional ¼-mile from the Action Area centerline. This Phase I ESA has been prepared with a focus of providing opinions related to the configuration of the Action Area as delineated in Figures 2 through 13. Modifications to the Action Area may affect the findings stated herein.

#### 1.2 Scope of Services

In accordance with ASTM 1527-05, the user and the environmental professional may modify the scope of services performed under the practice for special circumstances such as a transmission corridor a large number of parcels and property owners. Due to the large number of parcels and property owners, property owners were not interviewed and site reconnaissance was limited for the purposes of this Phase I ESA. Therefore, based on our understanding of the project objectives and limitations, Geosyntec performed the following scope of work to complete the Phase I ESA:

- Database search for sites within the ASTM recommended distances from the corridor;
- Compiled a GIS database and visualization for review of reported sites;
- Reviewed historical physiographic information including topographic maps, aerial photographs, and geologic and hydrogeologic information;
- Performed aerial reconnaissance of the approximately 120-mile transmission corridor;
- Performed limited supplemental ground reconnaissance from public ROWs;
- Evaluated database search results for proximity and significance of reported incidents;

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<sup>&</sup>lt;sup>2</sup> As defined by ASTM Standards E 1527-05 and E 2247-08, a Recognized Environmental Condition is: "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions 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. Conditions determined to be de minimis are not recognized environmental conditions."

- Submitted regulatory file review requests to applicable regulatory agencies for pertinent sites identified from the database review, reconnaissance, or other referenced sources;
- Performed on-site regulatory file reviews at the San Diego Regional Water Quality Control Board, and the San Diego County Department of Environmental Health;
- Evaluated GeoTracker and Envirostor online database listings for sites identified within the Action Area;
- Evaluated results of database search, regulatory file review, and reconnaissance to determine the likelihood of the reported incidents and other observations to adversely affect construction; and
- Documented the procedures, findings, opinions, and conclusions of the Phase I ESA in this report.

This work was completed in general accordance with selected guidance contained within ASTM Standards E 1527-05 and E 2247-08 in consideration of the limitations and exceptions described in Section 1.3 of this report. For the purposes of this Phase I ESA report, SDG&E represents the "user," defined as "the party seeking to use Standards E 1527-05 and E 2247-08 to complete an *environmental site assessment* of the *property...*"

This ESA report was prepared by Mr. Douglas Baumwirt, GIT and reviewed by Messrs. Veryl Wittig, PG, and Sam Williams, PG (both "environmental professionals," as defined under ASTM Standards E 1527-05 and E 2247-08) of Geosyntec, in accordance with the peer review policy of the firm. Mr. Wittig's and Mr. Williams' professional qualifications are presented in Appendix G.

#### 1.3 <u>Limitations and Exceptions</u>

This Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs to be present, and adversely affect current user-planned construction which has been identified to Geosyntec in the Action Area (as defined herein). Not every property warrants the same level of assessment. Consistent with good commercial or customary practice, the appropriate level of assessment was guided by the type of property subject to assessment and the information developed in the course of the inquiry. A balance between the competing goals of limiting cost and time demands and the reduction of uncertainty about unknown conditions resulting from additional information was identified during the Phase I ESA.

Additional services considered optional by ASTM Standards E 1527-05 and E 2247-08, such as asbestos-containing building materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, biological agents, mold, and high voltage power lines, were not included in the scope of work. However, in addition to ASTM Standards E 1527-05 and E 2247-08 requirements, Geosyntec evaluated identified RECs according to the perceived likelihood of adversely affecting the current user-planned construction. This effort is considered to be a "non scope consideration" work item, as defined by ASTM Standards E 1527-05 and E 2247-08.

The findings and conclusions presented in this Phase I ESA are the result of professional interpretation of the information collected at the time of this study. This Phase I ESA was not an exhaustive search of all available records, nor does it include detailed assessment of all Phase I ESA findings. Geosyntec cannot "certify" or guarantee that any property is free of environmental impairment; no warranties regarding the environmental quality of the property are expressed or implied.

The findings of this report, to the best of our knowledge, are valid as of the date of this work. However, changes in the conditions of a property can occur with the passage of time, whether due to natural processes or the works of man on this or adjacent properties. In addition, changes in applicable or appropriate regulations and standards may occur, whether they result from legislation, from the broadening of knowledge, or from other reasons. Furthermore, the findings of this report are based on the configuration of the Action Area as delineated in Figures 2 through 13, as well as the current user-planned construction which has been identified to Geosyntec. Modifications to the Action Area, and changes to the current user-planned construction which has been identified to Geosyntec, may nullify some or all of the findings stated herein. Accordingly, the findings of this report may be invalidated wholly or partially by changes outside our control.

Specified information contained in this report has been obtained from publicly available sources and other secondary sources of information. Although care has been taken in compiling this information, Geosyntec disclaims any and all liability for any errors, omissions, or inaccuracies of the third parties in such information and data.

The work was performed using the degree of care and skill ordinarily exercised under similar circumstances by environmental consultants practicing in this or similar localities. No other warranty or guarantee, expressed or implied, is made as to the findings, opinions, conclusions, and recommendations included in this report.

#### 1.4 <u>User Reliance</u>

This Phase I ESA report has been prepared solely for the benefit of SDG&E. Geosyntec has issued the Phase I ESA report to its client and grants SDG&E the right to rely on the report contents. Except as specifically set forth in Geosyntec's proposal to SDG&E to perform this work, no third party shall have the right to rely on Geosyntec's opinions rendered in connection with the Services without SDG&E's approval and Geosyntec's written consent which may be conditioned on the third party's agreement to be bound to acceptable conditions and limitations similar to this Agreement.

#### 2 SITE DESCRIPTION

The Action Area comprises some portion of more than 400 parcels comprising approximately 3,800 acres including a 300-foot-wide ROW for approximately 23 miles, a 200-foot-wide ROW for approximately 91 miles, and a 60-foot-wide segment for approximately 6 miles within an existing ROW. The Action Area also includes a new substation, access roads, temporary work areas, pull and tension sites, fly yards, and staging areas. A list of parcels within the ½-mile-wide corridor centered on the alignment, identified ownership information, and figures provided by SDG&E depicting land use in the vicinity of the Action Area are provided in Appendix A [SanGIS, 2009; ICA, 2009].

#### 2.1 Regional Characteristics

A description of the regional characteristics of the Action Area is provided in this section. Features identified are referenced to Mile Posts (MPs) specified for the Sunrise Powerlink project (Figures 2 through 13).

- MP 0 to MP 23 From the corridor's origin (MP 0) at the Imperial Valley Substation, the corridor traverses across the predominantly undeveloped Yuha desert valley and gentle hillside terrain.
- MP 23 to MP 30 Beginning at approximately MP 23, the corridor ascends the steep eastern escarpment of the Jacumba Mountains and Mountain Springs Grade to MP 30.
- MP 30 to MP 36 From MP 30 the corridor passes westward through the high desert terrain of the Jacumba Valley before heading northwest at approximately MP 36 toward McCain Valley.
- MP 36 to MP 54 The corridor parallels McCain Valley Road until approximately MP 51 where the corridor ascends the steep undeveloped foothills south of the Laguna Mountains to Thing Valley at MP 54, and heads southwest through the rolling hills and ranchland of Thing Valley.
- MP 54 to MP 65 At approximately MP 59 the corridor crosses I-8 and traverses the ridges and valleys toward Lake Morena Village at approximately MP 65.
- MP 65 to MP 78 From approximately MP 65, the corridor heads west over the mountainous and sparsely populated region south of Lake Morena and Barrett Lake to MP 78.
- MP 78 to MP 92 At approximately MP 78, the corridor heads northward over lower ridges and valleys to the eastern side of Alpine at MP 92.
- MP 92 to MP 98 From the east side of alpine, the corridor parallels the I-8 across the rolling hills through the relatively densely populated commercial, industrial, and residential areas of Alpine to approximately MP 98.

- MP 98 to MP 101 From MP 98, the corridor heads northward, crosses I-8 and follows open space through Chocolate Canyon and Peutz Valley toward El Capitan Reservoir at MP 101.
- MP 101 to MP 108 From the south side of El Capitan Reservoir at MP 101, the corridor follows the undeveloped north rim of the San Diego River Valley toward the mouth of Slaughterhouse Canyon at approximately MP 108.
- MP 108 to 113 The corridor heads north along the east rim of the industrial areas within Slaughterhouse Canyon paralleling Highway 67 and ascends the grade toward Goat Peak.
- MP 113 to MP 118.1 At approximately MP 113, the corridor heads west and southwest across the undeveloped hilly terrain east of Marine Corps Air Station (MCAS) Miramar to the termination of the transmission corridor at the Sycamore Canyon Substation (MP 118.1).

#### 2.2 Current Action Area Uses

The Action Area traverses approximately 49 miles of Bureau of Land Management (BLM) property; and approximately 19 miles of United States Forest Service (USFS) property. Approximately 50 miles of the proposed alignment includes other Federal, State, and private property within the Action Area.

Land use within the Action Area includes open space recreational areas, nature preserves, agricultural properties, rural and suburban residential housing, commercial businesses, and existing roadways. GIS figures depicting land use within and in the vicinity of the Action Area were provided by SDG&E and are included in Appendix A. A detailed evaluation of land use within the Action Area is presented in the Environmental Impact Report, prepared by Aspen Environmental Group (EIR) [Aspen, 2008].

#### 2.3 Surrounding Land Uses

Land use surrounding the Action Area includes open space recreational areas, nature preserves, agricultural properties, rural and suburban residential housing, and commercial businesses.

The configuration of the alignment has been designed to minimize the disturbance of sensitive lands. Some nearby land use includes sensitive areas such as Indian reservations, wetlands, ranches, and farms. In some areas, such as the Slaughterhouse Canyon area, nearby properties include various industrial facilities and quarries.

Figures depicting land use surrounding the Action Area were provided by SDG&E and are included in Appendix A. A detailed evaluation of land use surrounding the Action Area is presented in the EIR [Aspen, 2008].

#### 2.4 Action Area Improvements

The majority of the Action Area consists of undeveloped open space. However, some of the improvements observed within the Action Area include but are not limited to:

• Two existing substations;



- Railroad tracks;
- Agricultural land (actively cultivated fields, egg farms, and dairies);
- Cleared land;
- Highway Interstate-8;
- Alpine Boulevard;
- Other roads; and
- Residential structures.

#### 3 GEOLOGIC AND HYDROGEOLOGIC SUMMARY

The Action Area traverses two geomorphic provinces, including the Peninsular Range geomorphic province in San Diego County, and the Colorado Desert geomorphic province in Imperial County [Norris and Webb, 1990]. The topography of the Action Area is highly variable with elevations ranging from approximately Mean Sea Level (MSL) near the Imperial Valley Substation, to more than 5,700 feet above MSL near Thing Valley. The geologic materials comprising the ground surface along the corridor include alluvial fan deposits, conglomerates, sandstones, volcanic, metamorphic rocks, and a wide variety of granitic rocks [Todd, 2004]. A summary of the geologic setting of the Action Area is provided in Table 1.

Groundwater and surface water within the Action Area are regulated by the Colorado River Regional Water Quality Control Board (RWQCB) from Mile Post 0 to the Tecate Divide at approximately MP 51, and the San Diego RWQCB from approximately MP 51 to MP 118.1. The Action Area traverses five designated State Water Resources Control Board Hydrologic Units: Imperial, Anza Borrego, Tijuana River, Sweetwater, and San Diego Hydrologic Units. Groundwater along the Action Area has designated beneficial uses for municipal, agricultural, industrial service, and/or industrial process purposes [SD-RWQCB, 2007, and CR-RWQCB, 2006]. A summary of the groundwater hydrologic Subareas and corresponding beneficial uses is presented in Table 2.

The Action Area traverses four designated State Water Resources Control Board surface water watersheds: West Colorado Basin, Tijuana River Watershed, Sweetwater River Watershed, and San Diego River Watershed. Surface water along the Action Area has beneficial uses for municipal, agricultural, industrial supply, industrial process, groundwater recharge, freshwater habitat, hydropower generation, Recreation 1 and 2, biological habitat of significance, warm and cold water habitat, wildlife habitat, rare threatened or endangered species, and aquatic species spawning reproduction, and/or early development purposes [SD-RWQCB, 2007, and CR-RWQCB, 2006]. A summary of the surface water watersheds and corresponding beneficial uses are presented in Table 2.

#### 4 USER PROVIDED INFORMATION

In accordance with ASTM Standards E 1527-05 and E 2247-08, Geosyntec requested that the user of the Phase I ESA provide information (that would assist in identifying the possibility of RECs in connection with the Action Area), including but not limited to:

- Reviewing title and judicial records for environmental liens or activity and use limitations recorded against properties within the Action Area;
- Communicating specialized knowledge or experience that is material to RECs in connection with the Action Area;
- Providing information about previous ownership or uses of the properties within the Action Area;
- Providing information on a significantly lower purchase price, if applicable;
   and
- Designating personnel who are the most knowledgeable about the Action Area that will be interviewed by Geosyntec personnel.

#### 4.1 <u>Title Records</u>

The user did not report any information regarding activity and use limitations filed or recorded for the sites within the Action Area.

#### 4.2 Environmental Liens

The user did not report any environmental liens against properties within the Action Area.

#### 4.3 Specialized Knowledge

The user did not report any specialized knowledge or experience that is material to a recognized environmental condition in connection with the sites within the Action Area, including issues related to the existing transmission lines in the Action Area.

#### 4.4 Commonly Known or Reasonably Ascertainable Information

The user did not report any commonly known or reasonably ascertainable information material to recognized environmental conditions in connection with the Action Area.

#### 4.5 Valuation Reduction for Environmental Issues

The user did not report the purchase prices of the properties purchased as part of the project. The user reported that much of the Action Area will be obtained as public utility ROW.

#### 4.6 Owner, Property Manager, and Occupant Information

Geosyntec did not perform any interviews with owners, property managers, or occupants for historical information related to sites within the Action Area.

#### 4.7 Reason for Performing Phase I ESA

CPUC Mitigation Measures P-7a and HS-APM-5, require a Phase I ESA in areas where excavation or significant ground disturbance will occur. In addition, the results of the ESA will be used to evaluate the potential presence of contamination within the Action Area which could adversely affect construction, mobilize contaminants, and/or expose workers and the public.

#### 4.8 Other User Provided Information

The user provided GIS database information including shape files delineating the Action Area, proposed construction locations of tower pads, towers, trenches, access roads, fly yards, storage yards, and tension sites. Additionally, the user provided design drawings for the underground section of the alignment through Alpine Boulevard, figures depicting land use in the project vicinity, and GIS database information including San Diego and Imperial County assessor's parcel map layers and the corresponding limited ownership information [SanGIS, 2009; ICA, 2009]. SDG&E also provided Geosyntec with access to the 2008 EIR for the Sunrise Powerlink project, including a prior Environmental Data Resources, Inc. (EDR) database search report [Aspen, 2008].

#### 5 RECORDS REVIEW

#### 5.1 General

The following sections present a summary of historical aerial photographs and topographic maps reviewed for this ESA, and the results of the environmental database search.

#### 5.2 <u>Historical Aerial Photographs and Topographic Maps</u>

To assess the presence of historical activities within the Action Area which pose the potential for adverse impacts to the Action Area, Geosyntec obtained readily ascertainable historical aerial photographs and historical topographic maps from EDR. Additionally, select historical aerials available for the Action Area were viewed online at www.HistoricAerials.com [HistoricAerials.com, 2009]. Due to the scale of the Action Area, Geosyntec did not obtain all available historical aerial photographs from EDR including historical aerial photographs for the western portion of the Action Area from 1963 and 1989, and for the entire Action Area from 2002. Review of all historical aerial photographs for the more than 3,800 acres comprising the Action Area would not likely be considered "practically reviewable," as defined by ASTM Standards E 1527-05 and E 2247-08 (§ 3.2.65 and (§ 3.2.70, respectively). Furthermore, "intervals" as described in ASTM Standards E 1527-05 and E 2247-08, (§ 8.3.2.1), states "if the specific use of the property appears unchanged over a period longer than five years, then it is not required by the practice to research the use during that period." Although considered unlikely, this may have affected identification of RECs within the Action Area.

Historical aerial photographs from EDR for the years 1953, 1980, 1996, and 2008, and USGS topographic maps from EDR for the years 1903, 1947, 1955, 1957, 1960, 1971, 1976, 1977, 1979, 1982, 1988, and 1997 are provided in Appendix C and Appendix D, respectively. A summary of the aerial photograph and topographic map review is presented in Table 3. If potential RECs were identified during the review of the referenced historical aerial photographs and topographic maps, this information was also incorporated into the tabulated summary of identified sites presented in Table 4.

#### 5.3 Regulatory Database Search Report

To assess the presence of hazardous substances or petroleum hydrocarbon impacts within the Action Area, a regulatory database search report was ordered from EDR (Appendix B). The geographical coordinates provided by SDG&E for the proposed transmission alignment, substation, and other features within the Action Area were provided to EDR to generate the database search report. The database search conservatively considered a ½-mile wide corridor centered on the proposed transmission alignment and a ¼ mile radius buffer around other features of interest within the Action Area as the target site. Therefore, database search radius distances were expanded an additional ¼-mile from the Action Area centerline (for example, Leaking Underground Storage Tank sites are typically queried for properties within ½-mile of the target site; however, the radius search expanded the radius an additional ¼-mile for a total radius of ¾-miles from the Action Area centerline). The regulatory database search included, but was not necessarily limited to the standard environmental record sources and search

distances listed in Section 8.2.1 of ASTM Standards E 1527-05 and E 2247-08 which includes federal, state, and tribal regulatory agency databases. Based on the search of these databases, local information sources listed in Section 8.2.2 of ASTM Standards E 1527-05 and E 2247-08 were used to supplement the database search to meet the project objectives.

Typical of a search radius with such magnitude (greater than 60 square miles) as this Phase I ESA, a voluminous list of "orphan sites" were provided by EDR. Orphan sites are sites which appear in one or more of the databases searched that have either contradictory or insufficient geographic locational data. For each orphan site provided by EDR, the listing was evaluated for proximity to the Action Area. For those orphan sites found to be located within the search radius criteria, the listing was appended to the primary list of identified sites. Those orphan sites found to lie sufficiently distant from the Action Area were deleted from further consideration.

#### **5.3.1** Summary of Database Review

Based on the regulatory database information identified by EDR, additional investigation in the forms of local agency file requests and site reconnaissance was performed. Sites identified in the database search report provided by EDR were filtered and evaluated to for the spatial relationship of the reported site with respect to the Action Area. Sites identified near the Action Area with the perceived potential to result in RECs were additionally researched by requesting a review of files at the lead agency for the cases in question.

Sites of concern identified in the regulatory database search report provided by EDR, identified during agency file review, or observed during aerial and/or ground reconnaissance determined to exhibit RECs were subdivided into three categories based on the nature of the reported or observed conditions:

- RECs: The presence or likely presence of any hazardous substances or petroleum products under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous materials or petroleum products into structures or into the ground, groundwater, or surface water within the Action Area. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that would generally do not present a threat to human health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies. De minimis conditions are not RECs.
- Suspected RECs (SRECs): The likely presence of any hazardous substances or petroleum products under conditions that may indicate an existing release, a past release, or a material threat of a release of any hazardous materials or petroleum products into structures or into the ground, groundwater, or surface water within the Action Area; although, identification of evidence was not positively identified. The term includes agricultural sites that may have been applied with pesticides and/or herbicides even under conditions in compliance with laws.

• Historical RECs (HRECs): An environmental condition which in the past would have been considered a REC, but which may not be considered a REC currently. The term includes the former presence of any hazardous substances or petroleum products under conditions that may indicate an a past release of any hazardous materials or petroleum products into structures or into the ground, groundwater, or surface water within the Action Area; although, the affect of the release is believed to no longer pose a threat to the Action Area. The term includes regulatory-closed cases which are believed to have been effectively mitigated.

The results of the database review, local agency file review, and site reconnaissance are presented in Table 4.

#### 5.4 <u>Local Regulatory Agencies</u>

Based on the results of regulatory database search, and review of information provided by SDG&E, Geosyntec contacted various regulatory agencies regarding information pertaining to areas of interest associated with the Action Area. Regulatory agencies contacted and supplemental databases reviewed included:

- United States Environmental Protection Agency (USEPA);
- California Department of Toxic Substances Control (DTSC);
- San Diego Regional Water Quality Control Board (SD-RWQCB);
- Colorado River Regional Water Quality Control Board (CR-RWQCB);
- County of San Diego Department of Environmental Health (SDCDEH);
- Imperial County Public Health Department (ICPHD);
- San Diego County Department of Agricultural Weights and Measures;
- GeoTracker Database;
- DTSC Envirostor Database:
- California Department of Oil, Gas, and Geothermal Resources (DOGGR) database; and
- United States Bureau of Land Management (BLM).

Geosyntec received responses (telephone, fax, e-mail, or letter) and/or files from each of the above-referenced sources (Appendix E). If additional files are received after the finalization of this Phase I ESA report which change our findings or conclusions, then an addendum will be prepared.

Pertinent information obtained from local regulatory agencies and other supplemental database resources was incorporated into the summary of identified sites presented in Table 4.

#### **5.5** Previous Site Assessment Reports

No prior ESA reports were provided to Geosyntec by the user for this Phase I ESA. However, SDG&E referred Geosyntec to the October 2008 EIR prepared for the Sunrise Powerlink [Aspen, 2008]. The EIR included previous EDR database search reports for the Sunrise Powerlink.

#### 5.6 Additional Screening of Potential RECs

Identified sites of concern were further evaluated for potential to adversely affect construction and/or require mitigation as defined by the Sunrise Mitigation Measures sections P-7a, "evaluation of contaminated sites," HS-APM-5, "government code §65962.5 sites," and P-2a, "testing for residual pesticides/herbicides on currently or historically farmed land." During the evaluation, proposed construction activities nearby the identified sites were considered. For example, in areas where nearby sites were identified with localized impacts in a topographically low-lying location, and the proposed nearby construction includes towers installed on topographically prominent ridgelines or otherwise higher elevations, the potential for the identified impacts to adversely affect construction may be reduced. Additionally, in areas where groundwater impacts were identified in the vicinity of the Action Area, and depth to groundwater is such that soil disturbance of the proposed construction would not potentially contact or affect the groundwater impacts, the potential for the identified impacts to adversely affect construction may be reduced.

Based on the information reviewed during the Phase I ESA, sites were further classified in accordance with the following screening criteria:

- Low Potential to Affect Construction: Sites with little or no potential to adversely impact
  proposed construction in the Action Area or require implementation of mitigation
  measures.
- Low-Medium Potential to Affect Construction: Sites identified as potential historically
  or currently farmed land, or facilities with documented spills, releases, or other incidents
  which are not likely to affect construction. However, agricultural sites may require
  implementation of mitigation measures.
- Medium-High Potential to Affect Construction: Sites identified as facilities with documented spills, releases, or other incidents which are likely to adversely affect construction and/or require implementation of mitigation measures.

Sites requiring mitigation based on the Sunrise Mitigation Measures are presented in Table 5.

#### 5.7 Geographical Summary of RECs

The results of the records review, aerial, and ground reconnaissance are summarized on Figures 2 through 13 when viewed electronically using Adobe Acrobat. In the electronic format, each identified site symbol is hyperlinked to a summary table of identified information regarding the selected site.

#### **6 SUMMARY OF SITE RECONNAISSANCE**

#### **Methodology and Limiting Conditions**

Following review of the database search report, historical aerial photographs, historical topographic maps, and other pertinent information provided by SDG&E, Geosyntec performed site reconnaissance in two phases. The initial phase of the reconnaissance involved performance of an aerial site reconnaissance of the Action Area using a helicopter. During the flyover, "areas of interest" were photographed and referenced by GPS coordinates for the second phase of site reconnaissance, which involved a ground reconnaissance of the locations identified during the aerial reconnaissance or records review.

#### 6.2 **Aerial Reconnaissance**

Geosyntec subcontracted Blackhawk Helicopters to facilitate the aerial reconnaissance performed by Mr. Douglas Baumwirt, GIT and Dr. Annette Dietz, Ph.D., both of Geosyntec, on 11 June 2009. Geosyntec was accompanied by Mr. Tom Carr of SDG&E to direct the pilot along the corridor and provide site background information. The aerial reconnaissance included a flight at altitudes ranging from as low as 100 feet in some areas, to greater than 1,500 feet in other areas due to protected habitat/species restrictions. The aerial reconnaissance did not include landing within the Action Area. A GPS track-log is presented on Figures 2 through 13 to document the flight pattern during the reconnaissance. Due to the limitations associated with observation from such altitudes, observations of potential RECs were noted for possible supplemental ground reconnaissance, and/or appended to the summary of identified sites presented in Table 4. Photographs of identified RECs and other pertinent features are presented in Appendix F, and linked to the Figures when viewed electronically in Adobe Acrobat.

#### **6.3 Ground Reconnaissance**

According to ASTM Standard 2247-08 (§9.2.3), when a remote method of reconnaissance is used such as an aerial flyover, suspect areas identified must be inspected by walking through those locations to "ground truth" the observations. Therefore, based on observations made during the aerial reconnaissance and sites identified during review of the database report, additional ground reconnaissance was performed to further evaluate the presence of potential RECs. Ground reconnaissance was performed from accessible public roads by Messrs. Douglas Baumwirt, GIT and Alex Greene, PG, both of Geosyntec, on 17 June 2009. Ground reconnaissance locations included the following areas:

- Ocotillo Desert Fuel Stop (MP 21);
- In-Ko-Pah (MP 29);
- Jacumba Burn Dumps 1 and 2 (MP 33);
- Jacumba Valley Ranch (MP 34);
- Holes Property Junk Yard (MP 37);



- McCain Valley Conservation Camp (MP 41);
- Alpine Boulevard (MP 96);
- Tavern Road in Alpine (MP 97); and
- Slaughterhouse Canyon (MP 110);

Observations of potential RECs identified during the ground reconnaissance were appended to the summary of identified sites presented in Table 4. Photographs taken of identified RECs are presented in Appendix F, and linked to the Figures when viewed electronically in Adobe Acrobat.

#### 7 INTERVIEWS

#### 7.1 <u>Interviews with Owners, Site Managers, and Occupants</u>

Interviews with owners, site managers, and occupants were not performed.

#### 7.2 Interview of State and/or Local Officials

No case managers identified at the regulatory agencies which may have had files related to the Action Area were available for interview; therefore, no interviews with regulatory personnel were performed.

#### 7.3 <u>Interviews with Others</u>

Geosyntec performed an interview with Mr. Tom Carr, a SDG&E employee, during the aerial reconnaissance. Mr. Carr indicated he had extensive knowledge related to the location and proposed activities within the Action Area. During the aerial reconnaissance, Mr. Carr identified a number of potential former agricultural sites which are currently proposed for use as fly yards and storage yards in the Action Area. Mr. Carr did not report information material to recognized environmental conditions.

#### 8 SUMMARY OF FINDINGS

Geosyntec has performed a Phase I Environmental Site Assessment in general conformance with the guidance contained within ASTM Standards E 1527-05 and E 2247-08 of the Sunrise Powerlink Action Area as depicted on Figures 1 through 13 of this report. Additionally, the results of the records review, aerial, and ground reconnaissance are summarized on Figures 2 through 13 when viewed electronically using Adobe Acrobat. In the electronic format, each identified site symbol is hyperlinked to a summary table of identified information regarding the selected site. The following discussion presents key findings from this assessment.

#### 8.1 Action Area Conditions and Use

- The Action Area currently consists of a mix of open space, agricultural areas, recreation areas, industrial and commercial areas, residential areas, existing roadways, and existing transmission corridor ROWs. Figures provided by SDG&E depicting land use within the Action Area are provided in Appendix A.
- In many sections of the Action Area, the client-proposed tower locations are typically situated on ridgeline and other topographically elevated features, thus reducing the likelihood of impacts from nearby identified and unidentified sources of environmental impacts.
- Several of the isolated fly yards, storage yards, and staging areas were identified in potential former agricultural areas.
- The underground portion of the ROW is located in the community of Alpine within Alpine Boulevard.
- Mountain Springs Grade area is located within a predominantly undeveloped area with documented and protected sensitive habitat.

#### 8.2 Offsite Conditions and Use

Areas within the buffer zone of the Action Area include a mix of open space, agricultural areas, recreation areas, industrial and commercial areas, residential areas, roadways, and existing transmission corridor ROW.

#### 8.3 <u>Data Gaps</u>

Based on the identified information, it is believed that data gaps may have affected the identification of RECs within the Action Area. Following a thorough investigation, it appears that "data gaps" as defined by ASTM Standards E 1527-05 and E 2247-08, exist for this Phase I ESA as follows:

- Interviews with site owners or occupants were not performed.
- Aerial reconnaissance did not include hovering, landing within the Action Area, and altitude requirements were abided in sensitive areas. The aerial reconnaissance was

performed at an altitude ranging from 100 to 1,500 feet above the ground at speeds where observations of important features may not have been possible. Ground reconnaissance to "ground truth" aerial observations was limited to observations made from public roads; ground reconnaissance within the Action Area was not performed.

• Topographic maps and aerial photographs were not readily ascertainable in 5-year intervals dating back to first development for review.

Based on the data gaps outlined above, it is believed that data gaps may have affected the identification of RECs within the Action Area.

#### 8.4 Recognized Environmental Conditions

We have performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM Standards E 1527-05 and E 2247-08 of the Action Area which encompasses approximately 3,800 acres comprising a 300-foot-wide ROW for approximately 23 miles, a 200-foot-wide ROW for approximately 91 miles, and a 60-foot-wide segment for approximately 6 miles within an existing ROW, the Action Area. Any exception to, or deletions from, this practice are described in Section 8.3 Data Gaps of this report. This assessment has revealed evidence of RECs in connection with the Action Area which are summarized in Table 4.

#### 8.4.1 Historical Recognized Environmental Conditions (HRECs)

Six HRECs were identified for the Action Area, including three service stations with closed LUST cases, a localized transformer leak that was reported to have been remediated, an abandoned quarry where mitigation of illegal dumping was performed to the satisfaction of the DTSC, and a water purification facility where no further remedial action is planned. Based on the available information, Geosyntec concludes these identified HREC sites present a low potential to affect construction with one exception. One of the service stations (Alpine Shell, Site ID No. 78; Figure 9) is within such proximity to the Action Area that residual impacts may affect construction; therefore, it appears to present a medium to high potential to affect construction.

#### 8.4.2 Suspected Recognized Environmental Conditions (SRECs)

Twenty-eight SRECs (including 6 agricultural sites) were identified for the Action Area. These sites may potentially present an elevated risk of adverse environmental conditions within the Action Area, and include potential former agricultural sites, sites with documented releases located nearby the Action Area, or contain the potential to have created an unreported REC. Based on the available information, Geosyntec concludes the identified SREC sites present a potential to affect construction ranging from low to low-medium.

#### **8.4.3** De Minimis Conditions

De minimis conditions were observed at various locations throughout the Action Area. Such conditions include relatively small areas of poor housekeeping, abandoned structures, and other conditions which Geosyntec concluded do not present an obvious material threat to the

environment and would likely not be the subject of enforcement action if brought to the attention of the appropriate regulatory agency. Therefore, Geosyntec concludes these conditions do not appear to present a significant potential to affect construction.

#### 8.4.4 Current Recognized Environmental Conditions

Eight current RECs were identified during the Phase I ESA. These sites include LUST sites with ongoing remediation within or near the Action Area, and a site with observed discolored soil near the Action Area. Key areas where RECs were identified are:

- Two intersections in the community of Alpine are developed with a pair of adjoining service stations with documented releases. Design drawings provided by SDG&E for the underground portion of the ROW were evaluated and compared to files reviewed at local regulatory agencies and obtained from GeoTracker. A groundwater monitoring well network was observed at the service station located at 2232 Alpine Boulevard, at the intersection of Marshall Road (Site ID No. 79; Figure 9). Groundwater monitoring well networks were also observed in the vicinity of two additional adjoining service stations located at 1661 Alpine Boulevard and 1340 Tavern Road (Site ID Nos. 103 & 104; Figure 9). Based on the available data from the groundwater monitoring wells, it appears that the potential exists for contaminated shallow groundwater to be encountered during trenching for the underground portion of the alignment. Furthermore, the smear zone of contaminated soil may also be encountered during excavation. Based on the available information, Geosyntec concludes these four LUST sites in Alpine represent a medium-high potential to affect construction.
- Two sites located in Alpine north of Interstate-8, Impac Ready Mix and Texaco, are located in the vicinity of a proposed storage yard (Site ID Nos. 110 & 111; Figure 10). According to GeoTracker, the Texaco site reportedly has a history of fuel releases. Impac Ready Mix appears to store large quantities of fuel onsite, and discolored soil was observed at the Impac Ready Mix site in aerial photography and during site reconnaissance. Therefore, these sites represent RECs with regards to the nearby proposed storage yard. Depending on the nature of construction at the storage yard, and based on the available information, Geosyntec concludes these two sites may represent a low to medium-high potential to affect construction.
- Near the town of Jacumba, the Jacumba Texaco gas station is the site of a release of benzene plume which extends beneath the Action Area (Site ID No. 9; Figure 4). Groundwater in the vicinity of the release is reported to be at a depth greater than 70 feet below the ground surface. While this site is considered a REC by the ASTM standards, Geosyntec concludes that based on the depth of groundwater and the shallow nature of the proposed construction, the potential to adversely affect construction appears low.
- Along McCain Valley Road near the community of Boulevard, the McCain Valley Conservation Camp site is reported to be the site of a release of petroleum hydrocarbons which may or may not extend beneath the Action Area (Site ID No. 22; Figure 3). While this site is considered a REC by the ASTM standards, Geosyntec concludes that

based on the depth of groundwater and the shallow nature of the proposed construction, the potential to adversely affect construction appears low.

• Near the community of Ocotillo, the Desert Fuel Stop is reportedly responsible for a gasoline release to soil and groundwater (Site ID No. 5; Figure 3). A storage yard is proposed to be located adjoining this property. Based on the proposed construction at the adjoining property, the potential for groundwater impacts to adversely affect construction appears low-medium.

#### **8.5** Recommendations for Addressing CPUC Mitigation Measures

Pursuant to the Sunrise Mitigation Measures stipulated by the CPUC and the BLM, the following measures are recommended to address identified sites considered to present elevated potential to adversely affect construction. A summary of the sites requiring mitigation measures is presented in Table 5:

#### 8.5.1 Agricultural Site Sampling

Pursuant to Sunrise Mitigation Measure P-2a, it is recommended for Site ID Nos. 12, 34, 47, 136, 137, and 144 that soil samples be collected and tested for herbicides, pesticides, and fumigants to determine the presence of contamination within the proposed areas of construction. The sampling and testing plan should be prepared in consultation with the County Agricultural Commission, and sampling should be conducted under the direction of an appropriate California licensed professional. Samples should be sent to a California Certified laboratory for the appropriate analysis. A report documenting the areas sampled, and the process used for sampling and testing, shall be submitted to the CPUC and BLM for review and approval at least 60 days before construction. Results of the laboratory testing and recommended resolutions for handling and excavation of material found to exceed regulatory requirements shall be submitted to the CPUC and BLM (if on BLM land) 30 days prior to construction.

#### 8.5.2 Onsite Reconnaissance

Pursuant to Sunrise Mitigation Measure HS-APM-5, it is recommended for Site ID No. 111 that onsite field reconnaissance be performed to evaluate the discolored soil observed in aerial photographs to determine the potential to impact the project.

#### 8.5.3 Construction Monitoring and Contingency Planning

Pursuant to Sunrise Mitigation Measure P-7a, it is recommended for Site ID Nos. 78, 79, 88, 90, 103, and 104 that during excavation near these sites be monitored for impacted soils and a contingency plan be prepared to properly handle and dispose impacted soils if encountered. In accordance with the Mitigation Measure, it is recommended that health and safety risk be mitigated by the preparation of site-specific health and safety plans, and work plans including soil disposal and characterization directives.



#### 8.5.4 Notification and Training

Pursuant to Sunrise Mitigation Measure HS-APM-5, it is recommended for Site ID Nos. 1 and 178 that construction personnel are notified and trained on safety procedures for working in areas with a potential to contain unexploded ordinances.

#### 9 CERTIFICATION

This environmental site assessment (ESA) was prepared in accordance with the scope of work, terms and conditions described in Geosyntec's proposal dated 1 May 2009. The scope of work followed guidance contained in the ASTM Standards E 1527-05, Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process, and E 2247-08, Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property.

I declare that, to the best of my professional knowledge and belief that I meet the definition of Environmental Professional as defined in §312.10 of 40CFR 312 and I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property.

Veryl Wittig

California Professional Geologist No. 7115

Date

Sam Williams

California Professional Geologist No. 4858

Date

#### 10 REFERENCES

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