

April 16, 2018

Job No. 3-418-0257

Mr. David Dawud
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9051 Van Nuys Blvd., Suite 2
Panorama City, CA 91402

Subject: AAI PHASE I ENVIRONMENTAL SITE ASSESSMENT
Proposed Commercial Development
1100 West Foothill Boulevard
Rialto, CA

Dear Mr. Dawud:

At your request and authorization, SALEM Engineering Group, Inc. (SALEM) has conducted this Phase I Environmental Site Assessment (ESA) of the Proposed Commercial Development located at 1100 West Foothill Boulevard in Rialto, California (subject property). During the course of this assessment, SALEM identified no evidence of a Recognized Environmental Condition (REC) in connection with the subject property as defined by ASTM E1527-13. However, the following site development issue was identified:

- SALEM's review of historical aerial photographs indicates that a dwelling was located within the eastern boundary of the subject property from at least 1949 until at least 1975. A septic system was likely associated with the former on-site dwelling. However, it is unknown if a septic system is currently located in the vicinity of the former dwelling. The presence of a septic system is not anticipated to adversely impact the subject property due to its presumed use for domestic purposes only. If a septic system is identified during the redevelopment of the subject property, it should be properly abandoned/closed or destroyed in accordance with state and local guidelines.

We appreciate the opportunity to assist you with this project. If you have any questions, or if we may be of further assistance, please do not hesitate to contact our office at (909) 980-6455.

Respectfully submitted,

SALEM Engineering Group, Inc.



Richard McCondichie, EP, CAC
Senior Environmental Project Manager



SALEM

engineering group, inc.

PHASE I ENVIRONMENTAL SITE ASSESSMENT

PROPOSED COMMERCIAL DEVELOPMENT
1100 WEST FOOTHILL BOULEVARD
RIALTO, CALIFORNIA

SALEM PROJECT NO. 3-418-0257
APRIL 16, 2018

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April 16, 2018

Job No. 3-418-0257

PHASE I ENVIRONMENTAL SITE ASSESSMENT**PROPOSED COMMERCIAL DEVELOPMENT
1100 WEST FOOTHILL BOULEVARD
RIALTO, CALIFORNIA****1.0 EXECUTIVE SUMMARY**

SALEM Engineering Group, Inc. (SALEM) has conducted a Phase I Environmental Site Assessment (ESA) of the Proposed Commercial Development located at 1100 West Foothill Boulevard in Rialto, California (subject property). The subject property comprises two contiguous rectangular-shaped parcels of land totaling approximately 6.75 acres (San Bernardino County Assessor's Parcel Numbers [APNs] 0128-571-16-0000 and 0128-571-24-0000). SALEM conducted this Phase I ESA of the subject property in conformance with the American Society for Testing and Materials (ASTM) E1527-13 *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The U.S. Environmental Protection Agency (USEPA) has determined that the ASTM E1527-13 Standard is consistent with the requirements for conducting an "All Appropriate Inquiry" under 40 C.F.R. Part 312. Thus, this Phase I ESA constitutes All Appropriate Inquiry (AAI) designed to identify Recognized Environmental Conditions (RECs) in connection with the previous ownership and uses of the subject property as defined by ASTM E1527-13 and 40 C.F.R. Part 312.

ASTM E1527-13 Section 1.1.1 *Recognized Environmental Conditions* – The term *recognized environmental conditions* is defined as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment." The term as further defined by ASTM "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*.

SALEM identified no evidence of a REC in connection with the subject property as defined by ASTM E1527-13. However, the following site development issue was identified:

- SALEM's review of historical aerial photographs indicates that a dwelling was located within the eastern boundary of the subject property from at least 1949 until at least 1975. A septic system was likely associated with the former on-site dwelling. However, it is unknown if a septic system is currently located in the vicinity of the former dwelling. The presence of a septic system is not anticipated to adversely impact the subject property due to its presumed use for domestic purposes only. If a septic system is identified during the redevelopment of the subject property, it should be properly abandoned/closed or destroyed in accordance with state and local guidelines.

2.0 PURPOSE AND SCOPE OF ASSESSMENT

2.1 Purpose

According to ASTM E1527-13, the purpose of this practice is to define good commercial and customary practice in the United States of America for conducting an *environmental site assessment* of a parcel of *commercial real estate* with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) and *petroleum products*. As such, this practice is intended to permit a *user* to satisfy one of the requirements to qualify for the *innocent landowner, contiguous property owner, or bona fide prospective purchaser* limitation on CERCLA liability (hereinafter, the “*landowner liability protections*,” or “*LLPs*”): that is, the practice that constitutes “*all appropriate inquiry* into the previous ownership and uses of the *property* consistent with good commercial or customary practice” as defined at 42 U.S.C. §9601(35) (B).

The Phase I ESA was conducted to identify ‘Recognized Environmental Conditions’ (RECs), ‘Controlled Recognized Environmental Conditions’ (CRECs) and ‘Historical RECs’(HRECs) as defined by the American Society for Testing and Materials (ASTM) *Designation E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. Section 1.1.1 of the ASTM *Designation E1527-13* 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 any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” The term as further defined by ASTM “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.” Section 3.2.18 defines a CREC 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).” Section 3.2.42 defines HREC 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 land use limitations, institutional controls, or engineering controls).”

2.2 Scope of Work

The objective of the SALEM Phase I ESA scope of work is to provide an evaluation of RECs at the subject property and potential off-site sources. The scope of work for this Phase I ESA conforms to ASTM E1527-13. SALEM was provided verbal authorization to conduct the Phase I ESA by Mr. David Dawud with Property Plus Mobil, LLC on March 19, 2018, in accordance with the scope of work outlined in SALEM’s Proposal No. P3-418-0315r. In fulfillment of the SALEM scope of work for this Phase I ESA, SALEM was retained to perform the following tasks:

- Acquire readily available information regarding land-use history and property development by reviewing historical aerial photographs, pertinent building permit records, historic city directories, as well as reviewing recent and historic topographic land-use maps of the subject property and surrounding area.

-
- A reasonable attempt at conducting interviews with at least one state and/or local government official in the form of either an in-person interview, by telephone, or in writing via a formal records request at the discretion of the environmental professional, in an effort to obtain information indicating RECs in connection with the subject property.
 - Reviewing readily available local, state and federal regulatory agency databases listed in ASTM E1527-13 and compiled by Environmental Data Resources, Inc. (EDR), including but not limited to CERCLA and NPL lists for sites within one mile of the subject property. State databases, including but not limited to CALSITES, Hazardous Substance Account Act, Cortese, SWIS, SWAT, Well Investigation Program (AB1803), and LUFT, were reviewed for sites within one mile of the subject property.
 - Performing a reconnaissance of the subject property and surrounding areas (up to one-half mile beyond site boundary), with regard to potential off-site sources of degradation to the subject property, which included photograph documentation of subject property conditions, and identification of potential environmental concerns. Interviews with persons knowledgeable of the previous and current ownership and uses of the subject property.
 - Identifying aboveground storage tanks and/or indications of underground storage tanks on-site.
 - In addition to ASTM E1527-13, SALEM recognizes ASTM *Standard Guide for Vapor Encroachment Screening (VES) on Property Involved in Real Estate Transactions* (ASTM E2600-10) as an industry-accepted guideline to determine if a Vapor Encroachment Condition (VEC) exists at the target property. A VES consists of reviewing the Phase I ESA data combined with the application of professional judgment. SALEM evaluates the regulatory agency databases to determine if there are known or suspect contaminated sites within a minimum search distance of the target property. In addition, SALEM attempted to determine whether soil and/or groundwater have been impacted within the critical distances outlined in ASTM E2600-10.
 - Preparing this report of SALEM's findings and recommendations if warranted.

3.0 SITE DESCRIPTION

The subject property comprises two contiguous rectangular-shaped parcels of land totaling approximately 6.75 acres (San Bernardino County APNs 0128-571-16-0000 and 0128-571-24-0000). At the time of SALEM's March 28, 2018 site reconnaissance, the subject property was undeveloped land covered with native vegetation. The subject property is located in Section 3, Township 1 South, Range 5 West, San Bernardino Baseline and Meridian, United States Geological Survey (U.S.G.S.) 7.5 Minute Topographic Map, Fontana, California Quadrangle dated 2012.

4.0 PHYSIOGRAPHY AND HYDROGEOLOGIC CONDITIONS

The subject property is located south of the San Gabriel Mountains in the Bunker Hill groundwater basin, at an elevation of approximately 1,137 feet above mean sea level. The Bunker Hill basin is a structural basin filled with Quaternary alluvial deposits comprised of eroded sand, gravel, and clay. The alluvium is the major aquifer in the basin and attains a maximum thickness of more than 4,000 feet. The regional hydrogeological setting for the subject site is characterized by steeply to moderate sloping alluvial deposits which are coarse near their apex in the mountains and grade to finer deposits towards the ocean. Within the

alluvial deposits are layers of sand and gravel, which may extend for some distance west, and which may serve as groundwater discharge areas. Near their source, the alluvial fans are underlain by, and in direct hydraulic contact with, older alluvial fans or lie directly upon consolidated fractured sedimentary, metamorphic, or igneous rock. Away from the mountains, these deposits consist of interbedded sand, silt, and clay with discontinuous lenses of coarse sand and gravel, which formed on a narrow coastal plain of moderate relief.

According to California Regional Water Quality Control Board (RWQCB) records for the Calnev Colton North Fuel Terminal leaking underground storage tank (LUST) site at 2051 Slover Avenue in Bloomington, California, located approximately 5,222 feet south of the subject property, groundwater in the subject property vicinity is first encountered at a depth of between approximately 184 to 210 feet below ground surface (bgs). Based upon SALEM's topographic map interpretation, the general direction of groundwater flow in the vicinity of the subject property is toward the south. However, local groundwater level and flow direction may vary due to seasonal fluctuations in precipitation, usage demands, geology, and/or surface topography.

5.0 SITE RECONNAISSANCE

A site reconnaissance, which included a visual observation of the subject property and properties within the subject area, was conducted by SALEM's environmental assessor on March 28, 2018. The objective of the site reconnaissance is to identify RECs, including the storage and handling of hazardous substances and petroleum products on or in the vicinity of the subject property which have the potential to environmentally impact on-site soils, surface water and groundwater.

5.1 Observations

Table I summarizes the visual observations made during our site reconnaissance. A discussion of the physical observations follows Table I. Refer to the Site Map (Figure 1) and color photographs following the text for the locations of the features discussed in this section of the report.

TABLE I
Summary of Observations during Site Reconnaissance

FEATURE	OBSERVED	NOT OBSERVED
Structures (existing)		X
Evidence of past uses		X
Hazardous substances and/or petroleum products (including containers)		X
Aboveground storage tanks (ASTs)		X
Underground storage tanks (USTs) or evidence of USTs		X
Strong, pungent, or noxious odors		X
Pools of liquid likely to be hazardous materials or petroleum products		X
Drums		X
Unidentified substance containers		X
Pad-mounted/Pole-mounted transformers/capacitors/other PCB-containing equipment		X
Subsurface hydraulic equipment		X
Heating/ventilation/air conditioning (HVAC)		X
Stains or corrosion on floors, walls, or ceilings		X
Floor drains and sumps		X
Pits, ponds, or lagoons		X
Stained soil and/or pavement		X
Stressed vegetation		X

TABLE I (cont'd)
Summary of Observations during Site Reconnaissance

FEATURE	OBSERVED	NOT OBSERVED
Waste or wastewater discharges to surface or surface waters on subject property (including stormwater)		X
Wells (irrigation, domestic, dry, injection, abandoned, monitoring wells)		X
Septic Systems		X

The subject comprises two contiguous rectangular-shaped parcels of land totaling approximately 6.75 acres (San Bernardino County APNs 0128-571-16-0000 and 0128-571-24-0000). At the time of SALEM's site reconnaissance, the subject property was undeveloped land covered with native vegetation.

- During the visual observations of the subject property, no hazardous materials were observed to be stored or handled on the subject property. Exposed surface soils did not exhibit obvious signs of discoloration. No other obvious evidence (vent pipes, fill pipes, dispensers, etc.) of USTs were noted within the area observed. No standing water or major depressions were observed on the subject property. No indications of former structures, such as foundations, were observed on the subject property.

5.2 Adjacent Streets and Property Usage

Table II summarizes the adjacent streets and properties uses observed during the SALEM's site reconnaissance.

TABLE II
Adjacent Streets and Property Use

DIRECTION	ADJACENT STREET	ADJACENT PROPERTY USE
North	None	Residential
East	None	Undeveloped Land
South	West Foothill Boulevard	Country of San Bernardino TAD Office (1175 W. Foothill Boulevard)
West	None	El Pollo Loco (1220 W. Foothill Boulevard)

Based on the observed uses of the properties located immediately adjacent to the subject property, it is unlikely that significant quantities of hazardous materials are stored or handled at the adjacent properties.

5.3 Potable Water Source

The water purveyor for the subject property is the City of Rialto Water Service Department (RWSD). The RWSD's water quality monitoring is an on-going program with water samples obtained on a regular basis. It is the responsibility of the RWSD to provide customers with potable water in compliance with the California Maximum Contaminant Levels (MCLs) for primary drinking water constituents in water supplied to the public. Water sampling was not conducted to verify water quality.

5.4 Sewage Disposal System

On March 28, 2018, the RWSD was contacted regarding sewer service for the subject property. According to the RWSD, no sewer violations or records of septic systems are on file for the subject property.

SALEM's review of historical aerial photographs indicates that a dwelling was located within the eastern boundary of the subject property from at least 1949 until at least 1975. A septic system was likely associated with the former on-site dwelling. However, it is unknown if a septic system is currently located in the vicinity of the former dwelling. The presence of a septic system is not anticipated to adversely impact the subject property due to its presumed use for domestic purposes only. If a septic system is identified during the redevelopment of the subject property, it should be properly abandoned/closed or destroyed in accordance with state and local guidelines.

5.5 Heating and Cooling Source

No structures are located on the subject property. Therefore, no heating or cooling sources exist at the subject property. No documentation of fuel oil use was identified during review of reasonably ascertainable records and no visual evidence of fuel oil use was identified during the site reconnaissance. Therefore, it is unlikely for a former fuel oil UST to have been used at the subject property and for a release to have occurred. However, based upon SALEM's experience, contamination which could be associated with a release would likely present a de minimis condition. If a fuel oil UST is discovered in the future and/or evidence of a release of historical fuel oil is identified, further evaluation may be necessary.

6.0 USER-PROVIDED INFORMATION

A review of the user-provided Title report and a Phase I ESA User Questionnaire was conducted in order to help identify pertinent information regarding potential environmental impacts associated with the subject property.

6.1 Title Report

On April 9, 2018 a Commitment for Title Insurance for the subject property by Chicago Title Insurance Company, dated November 30, 2017 was provided to SALEM by Mr. David Dawud with Property Plus Mobil, LLC. The Commitment for Title Insurance was reviewed to identify potential deed restrictions, environmental liens or activity and use limitations (AULs) which may have occurred on or exist in connection with the subject property as indicated by the Commitment for Title Insurance. SALEM's review of the Commitment for Title Insurance indicated no deed restrictions, environmental liens or AULs for the subject property. Refer to Appendix A for a copy of the Commitment for Title Insurance.

6.2 Phase I Environmental Site Assessment User Questionnaire

On March 30, 2018, a completed Phase I ESA User Questionnaire was received from Mr. David Dawud with Property Plus Mobil, LLC. Please refer to Appendix B for a copy of the completed Phase I ESA User Questionnaire.

In order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "*Brownfields Amendments*"), the *user* must provide the following information (if available) to the *environmental professional*. Failure to provide this information could result in a determination that "*all appropriate inquiry*" is not complete. The user is asked to provide information or knowledge of the following:

- Environmental cleanup liens that are filed or recorded against the site.
- Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry.
- Specialized knowledge or experience of the person seeking to qualify for the LLPs.
- Relationship of the purchase price to the fair market value of the *property* if it were not contaminated.
- Commonly known or *reasonably ascertainable* information about the *property*.
- The degree of obviousness of the presence or likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate investigation.

According to Mr. Dawud, to the best of his knowledge as the user of this Phase I ESA, no environmental cleanup liens and no activity or land use limitations have been filed or recorded against the subject property. Mr. Dawud indicated that he did not have knowledge of the past or current spills or chemical releases or environmental cleanups at the subject property. Additionally, Mr. Dawud didn't not specify whether the purchase price of the subject property reasonably reflects fair market value.

7.0 SITE USAGE SURVEY

In order to assess the subject property's history, SALEM conducted a review of a completed Phase I ESA Owner Questionnaire, historical aerial photographs, building department records, city directories, planning department records and SFIMs.

7.1 Phase I Environmental Site Assessment Owner Questionnaire

On March 30, 2018, a Phase I ESA Owner Questionnaire was completed by Mr. David Dawud with Property Plus Mobile, LLC, the owner of the subject property. The Phase I ESA Owner Questionnaire is designed to provide pertinent information regarding potential environmental and historical impacts associated with the subject property. Mr. Dawud reported that he had been familiar with the subject property for the past four months and that the subject property is currently undeveloped vacant land.

According to Mr. Dawud, to the best of his knowledge, no former or current USTs; no on-site treatment or discharge of waste; no on-site leach fields, dry wells, sumps; no hazardous material spills; no buried materials; no groundwater monitoring, domestic or irrigation wells; or any additional items of environmental concern are associated with the subject property. Please refer to Appendix C for a copy of the completed Phase I ESA Owner Questionnaire.

7.2 Historical Aerial Photograph Review

Historical aerial photographs of the subject property and vicinity dated 1938, 1949, 1953, 1959, 1966, 1968, 1975, 1985, 1990, 1994, 2005, 2010, and 2014 were reviewed to evaluate changes in land-use for the subject property. The historical aerial photographs were supplied by EDR. Refer to Appendix D for a copy of the EDR-provided aerial photographs. A summary of the aerial photographs is provided below:

➤ **1938 Aerial Photograph**

The subject property and adjoining properties to the north, east, and west appear to be vacant undeveloped land. No structures are located on the subject property. What appears to be a dirt path is observed separating the two parcels of the subject property. A two-lane paved road (West Foothill Boulevard) adjoins the subject property to the south, beyond which is undeveloped and agricultural land.

➤ **1949 Aerial Photograph**

The subject property appears to be developed with a residential structure located on the eastern boundary. The remaining portions of the subject property appear to be utilized for agricultural purposes as vineyard. The adjoining properties appear to be utilized for agricultural purposes as vineyard. A rural residential structure is observed on the east adjoining property.

➤ **1953 Aerial Photograph**

The conditions on the subject property and adjoining properties are similar to the 1949 aerial photograph.

➤ **1959 Aerial Photograph**

The conditions on the subject property and adjoining properties to the north, east and west are similar to the 1953 aerial photograph. The adjoining property to the south is developed with a commercial structure and associated parking lot. A two-lane paved road (Larch Avenue) is observed to the southeast of the subject property. An increase in residential development is observed further southeast of the subject property.

-
- **1966 Aerial Photograph**
What appears to be an additional structure (possible barn) is observed on the eastern boundary of the subject property. The conditions on the remaining portions of the subject property and adjoining properties are similar to the 1959 aerial photograph, with the exception of an increase in residential development further to the southeast.
 - **1968 Aerial Photograph**
The conditions on the subject property and adjoining properties are similar to the 1966 aerial photograph.
 - **1975 Aerial Photograph**
The resolution of the 1975 aerial is poor. However, it appears that the subject property and adjoining properties to the north, east and west are no longer utilized as agricultural land. The conditions on the adjoining property to the south are similar to the 1968 aerial photograph.
 - **1985 Aerial Photograph**
The subject property appears to be vacant undeveloped land. The structures are no longer visible on the eastern boundary of the subject property. The current residential development is observed adjoining to the north of the subject property. Undeveloped land is observed on the adjoining properties to the east and west, with the exception of the rural residence to the east of the subject property. The conditions on the adjoining property to the south are similar to the 1975 aerial photograph, with the exception of an increase in residential development further.
 - **1990 Aerial Photograph**
The conditions on the subject property and adjoining properties are similar to the 1985 aerial photograph.
 - **1994 Aerial Photograph**
The conditions on the subject property and adjoining properties are similar to the 1990 aerial photograph.
 - **2005 Aerial Photograph**
The conditions on the subject property and adjoining properties to the north, east and south are similar to the 1994 aerial photograph. The adjoining property to the west appears to be under construction for new development.
 - **2010 Aerial Photograph**
The conditions on the subject property and adjoining properties are similar to the 2005 aerial photograph, with the exception of development of the current commercial structures adjoining to the west.
 - **2014 Aerial Photograph**
The conditions on the subject property and adjoining properties are similar to the 2010 aerial photograph.

7.3 Building Department Records Review

On March 21, 2018, a records request was made to the City of Rialto Building Division (RBD) for the subject property. According to the RBD records, no building permits were available for the subject property. Therefore, no building permits for items of environmental concern including, USTs, ASTs, septic systems, demolition or pervious structures were on file for the subject property.

7.4 City Directories

On March 26, 2018, SALEM contracted with EDR to provide a City Directory Image Report dated 1975 through 2014 for the subject property, as well as the subject property vicinity. The subject property was not listed in the City Directory Image Report. Please refer to Appendix E for a copy of the EDR-provided City Directory Image Report.

7.5 Sanborn Fire Insurance Maps

SALEM reviews SFIMs to evaluate prior land use at the subject property and adjacent properties. SFIMs typically exist for cities with populations of 2,000 or more, the coverage dependent on the location of the property. On March 20, 2018, SALEM contracted with EDR to provide a Fire Insurance Map Abstract indicating the availability of historic SFIMs for the subject property and adjacent properties as far back as 1867. EDR's search of collections at the Library of Congress, University Publications of America, and various public and local sources revealed no coverage for the subject property and adjacent properties. Refer to Appendix F for a copy of the EDR SFIM No Coverage Certification.

7.6 Agricultural Chemicals

Review of historical aerial photographs indicates the subject property has not been utilized for agricultural purposes since at least 1975. Based upon the length of time since the subject property was last used for agricultural purposes, it is not anticipated that elevated concentrations of environmentally persistent pesticides would be found in the near-surface soils of the subject property. SALEM's sampling and analysis of surface soils from properties with similar histories has typically yielded non-detectable results for analysis of environmentally persistent pesticides. It is not anticipated that elevated concentrations of environmentally persistent pesticides would be found in the near-surface soils of the subject property and therefore, the former agricultural use of the subject property does not present an REC to the subject property.

7.7 Phase I Environmental Site Assessment Interview - Previous Owner

A Phase I ESA interview with the previous owner of the subject property was not reasonable ascertainable.

7.8 Previous Environmental Reports

SALEM was not provided with additional environmental reports for the subject property.

8.0 REGULATORY AGENCY RECORDS REVIEW

SALEM conducted a review of regulatory agency records for the purpose of determining if hazardous materials/hazardous wastes have been stored or handled on the subject property and area properties of environmental concern. The most current records available were reviewed.

California Environmental Protection Agency, Department of Toxic Substances Control

SALEM's March 22, 2018 review of the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) Envirostor California cleanup sites database available via the DTSC Internet Website which tracks federal superfund sites, state response sites, voluntary cleanup sites, and school cleanup sites, indicated that no records of cleanup sites are on file with the DTSC for the subject property or adjacent properties.

California Regional Water Quality Control Board

SALEM's March 22, 2018 review of the RWQCB Geotracker leaking underground fuel tank (LUFT) database available via the RWQCB Internet Website indicated no records of LUFTs are on file with the RWQCB for the subject property or adjoining properties.

California Division of Oil, Gas, and Geothermal Resources

SALEM reviewed the California Division of Oil, Gas, and Geothermal Resources (DOGGR) website (<http://maps.conservation.ca.gov/doms/index.html>) to evaluate the potential for existing/former oil, gas, or geothermal wells on the subject property or adjoining properties. The subject property is located within DOGGR Southern District. The subject property vicinity is not located within an oil, gas, or geothermal field. The review of DOGGR information does not indicate that an oil, gas, or geothermal well has been drilled on the subject or adjacent properties.

San Bernardino County Fire Department

On March 20, 2018, the San Bernardino County Fire Department-Hazardous Materials Division (SBCFD-HMD) was contacted regarding records of historical hazardous/flammable permits, hazardous materials handling, hazardous/flammable incidents, and/or registered USTs for the subject property. According to a representative of the SBCFD-HMD, no records of registered USTs, historical hazardous/flammable permits hazardous materials handling, or unauthorized releases of hazardous materials were on file for the subject property.

City of Rialto Fire Department

On March 28, 2018, the City of Rialto Fire Department (RFD) was contacted regarding records of historical hazardous/flammable permits, hazardous materials handling and registered USTs for the subject property. According to a representative of the RFD, no records of registered USTs, historical hazardous/flammable permits, hazardous materials handling, or unauthorized releases of hazardous materials were on file for the subject property.

Local Area Tribal Records

According to the EDR Radius Map Report, no tribal records are listed for the subject property or the adjacent properties.

8.1 Standard Environmental Record Sources

EDR performed a search of Federal, State and local regulatory agency databases for the subject property and surrounding area. The various search distances as required by ASTM E1527-13 extended up to one mile from the subject property. Several agencies have published documents that list businesses or properties which have handled hazardous materials or hazardous waste, or may have had a documented release of hazardous materials or petroleum products. The databases consulted in the course of this assessment were compiled by EDR on March 20, 2018 and represent reasonably ascertainable current listings. SALEM did not verify the locations and distances of every site listed by EDR. SALEM verified locations and distances of the sites SALEM deemed as having a potential to environmentally impact the subject property. The actual location of the off-site properties identified may differ from the EDR listing. Table III summarizes the listed properties located within the specified ASTM Search Radii. The EDR Radius Map report is included in Appendix H.

TABLE III
EDR Radius Map Summary

DATABASE	TYPE OF RECORDS	SUBJECT PROPERTY	<1/8 MILE	1/8 - 1/4 MILE	1/4 - 1/2 MILE	1/2 - 1 MILE
STANDARD ENVIRONMENTAL RECORDS						
<i>Federal NPL Site List</i>						
NPL	National Priorities List	0	0	0	0	0
Proposed NPL	Proposed National Priorities List	0	0	0	0	0
NPL LIENS	Federal Superfund Liens	---	---	---	---	---
<i>Federal Delisted NPL Site List</i>						
Delisted NPL	National Priority List Deletions	0	0	0	0	0
<i>Federal CERCLIS List</i>						

TABLE III (cont'd)
EDR Radius Map Summary

DATABASE	TYPE OF RECORDS	SUBJECT PROPERTY	<1/8 MILE	1/8 - 1/4 MILE	1/4 - 1/2 MILE	1/2 - 1 MILE
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information	0	0	0	0	---
Federal Facility	Federal Facility	0	0	0	0	0
<i>Federal CERCLIS NFRAP Site List</i>						
CERC-NFRAP	CERCLIS – No Further Remedial Action Planned	0	0	0	0	---
<i>Federal RCRA CORRACTS Facilities List</i>						
CORRACTS	Corrective Action Report	0	0	0	0	0
<i>Federal RCRA non-CORRACTS TSD Facilities List</i>						
RCRA-TSDF	Transporters, Storage, and Disposal	0	0	0	0	---
<i>Federal RCRA Generators List</i>						
RCRA – LQG	RCRA – Large Quantity Generators	0	0	1	---	---
RCRA – SQG	RCRA – Small Quantity Generators	0	0	1	---	---
RCRA – CESQG	Conditionally Exempt SQG	0	1	0	---	---
<i>Federal Institutional Controls/Engineering Controls Registries</i>						
US ENG CONTROLS	Engineering Controls Sites List	0	0	0	0	---
US INST CONTROL	Sites with Institutional Controls	0	0	0	0	---
<i>Federal ERNS List</i>						
ERNS	Emergency Response Notification System	0	---	---	---	---
<i>State and Tribal Equivalent NPL</i>						
RESPONSE	State Response Sites	0	0	0	0	1
<i>State and Tribal Equivalent CERCLIS</i>						
ENVIROSTOR	Envirostor Database	0	0	0	0	6
<i>State and Tribal Landfill and/or Solid Waste Disposal Site List</i>						
SWF/LF	Solid Waste Information System	0	0	0	0	---
<i>State and Tribal Leaking Storage Tank Lists</i>						
LUST	Leaking Underground Storage Tanks	0	0	0	0	---
SLIC	Statewide SLIC Cases	0	0	0	0	---
INDIAN LUST	LUST on Indian Land	0	0	0	0	---
<i>State and Tribal Registered Storage Tank Lists</i>						
UST	Active UST Facilities	0	0	2	---	---
AST	Aboveground Storage Tank Facilities	0	0	0	0	0
INDIAN UST	USTS on Indian Land	0	0	0	0	0
<i>State and Tribal Voluntary Cleanup Sites</i>						
INDIAN VCP	Voluntary Cleanup on Indian Land	0	0	0	0	---
VCP	Voluntary Cleanup Program Properties	0	0	0	0	---
ADDITIONAL ENVIRONMENTAL RECORDS						
<i>Local Brownfield Lists</i>						
US BROWNFIELDS	Brownfield Sites	0	0	0	0	---
<i>Local Lists of Landfill/Solid Waste Disposal Sites</i>						
ODI	Open Dump Inventory	0	0	0	0	---
DEBRIS REGION 9	Illegal Dump Site Locations	0	0	0	0	---
WMUDS/SWAT	Waste Management Unit Database	0	0	0	0	---
SWRCY	Recycler Database	0	0	0	0	---
HAULERS	Registered Waste Tire Haulers Lists	0	---	---	---	---
INDIAN ODI	Report on Open Dumps on Indian Land	0	0	0	0	---
<i>Local Lists of Hazardous Waste/Contaminated Sites</i>						
US CDL	Clandestine Drug Labs	0	---	---	---	---
HIST Cal-Sites	Cal sites Database	0	0	0	0	1
SCH	School Property Evaluation Program	0	0	0	---	---
Toxic Pits	Toxic Pits Cleanup Act Sites	0	0	0	0	0
CDL	Clandestine Drug Labs	0	---	---	---	---
<i>Local Lists of Registered Storage Tanks</i>						
CA FID UST	Facility Inventory Database	0	0	0	---	---
HIST UST	Historical UST	0	0	0	---	---
SWEEPS UST	SWEEPS UST Lists	0	0	0	---	---

TABLE III (cont'd)
EDR Radius Map Summary

DATABASE	TYPE OF RECORDS	SUBJECT PROPERTY	<1/8 MILE	1/8 - 1/4 MILE	1/4 - 1/2 MILE	1/2 - 1 MILE
Local Land Records						
LIENS 2	CERCLA Lien Information	0	---	---	---	---
LUCIS	Land Use Control Information System	0	0	0	0	0
LIENS	Environmental Liens Listing	0	---	---	---	---
DEED	Deed Restriction Listing	0	0	0	0	0
Records of Emergency Release Reports						
HMIRS	Hazardous Materials Information System	0	---	---	---	---
CHMIRS	CA Hazardous Material Information System	0	---	---	---	---
LDS	Land Disposal Sites Listing	0	---	---	---	---
MCS	Military Cleanup Sites Listing	0	---	---	---	---
Other Ascertainable Records						
RCRA Non-Gen	Non-Generators	0	0	0	---	---
DOT OPS	Incident and Accident Data	0	---	---	---	---
DOD	Department of Defense Sites	0	0	0	0	0
FUDS	Formerly Used Defense Sites	0	0	0	0	0
CONSENT	Superfund Consent Decrees	0	0	0	0	0
ROD	Records of Decision	0	0	0	0	0
UMTRA	Uranium Mill Tailings Sites	0	0	0	0	---
MINES	Mines Master Index File	0	0	0	---	---
TRIS	Toxic Chemical Release Inventory System	0	---	---	---	---
TSCA	Toxic Substances Control Act	0	---	---	---	---
FTTS	FIFRA/TSCA Tracking System	0	---	---	---	---
HIST FTTS	FIFRA/TSCA Tracking System	0	---	---	---	---
SSTS	Section 7 Tracking Systems	0	---	---	---	---
ICIS	Integrated Compliance Information System	0	---	---	---	---
PADS	PCB Activity Database System	0	---	---	---	---
MLTS	Material Licensing Tracking System	0	---	---	---	---
RADINFO	Radiation Information Database	0	---	---	---	---
FINDS	Facility Index System	0	---	---	---	---
RAATS	RCRA Administrative Action Tracking	0	---	---	---	---
CA BOND EXP. PLAN	Bond Expenditure Plan	0	0	0	0	0
CA WDS	Waste Discharge System	0	---	---	---	---
Cortese	Cortese Hazardous Waste & Substance Sites	0	0	0	0	---
NPDES	National Pollutant Discharge Elimination System	0	---	---	---	---
HIST CORTESE	Historical Cortese sites.	0	0	0	0	---
CUPA Listings	CUPA Resources List	0	0	0	---	---
Notify 65	Proposition 65 Records	0	0	0	0	0
DRYCLEANERS	Cleaner Facilities	0	0	1	---	---
WIP	Well Investigation Program Case List	0	0	0	---	---
San Bern Co. Permit	Industrial waste and UST sites	0	1	6	---	---
HAZNET	Facility and Manifest Data	0	---	---	---	---
EMI	Emissions Inventory Data	0	---	---	---	---
INDIAN RESERV	Indian Reservations	0	0	0	0	0
SCRD DRYCLEANER	State Coalition for Remediation of Cleaners	0	0	0	0	---
FINANCIAL ASSURANCE	Financial Assurance	0	---	---	---	---
HWP	Envirostor Permitted Facilities Listing	0	0	0	0	0
HWT	Registered Hazardous Waste Transporter	0	0	0	---	---
COAL ASH AREA	Coal Combustion Residues Surface List	0	0	0	0	---
PCB TRANSFORMER	PCB Transformer	0	---	---	---	---
COAL ASH DOE	Steam-Electric Plan Operation Data	0	---	---	---	---
MWMP	Medical Waste Management Program	0	0	0	---	---
PROC	Certified Processors Database	0	0	0	0	---
EDR PROPRIETARY RECORDS						
<i>EDR Proprietary Records</i>						

TABLE III (cont'd)
EDR Radius Map Summary

DATABASE	TYPE OF RECORDS	SUBJECT PROPERTY	<1/8 MILE	1/8 - 1/4 MILE	1/4 - 1/2 MILE	1/2 - 1 MILE
Manufactured Gas Plants	Manufactured Gas Plants	0	0	0	0	0
EDR Historical Auto Stations	EDR Historical Auto Stations	0	0	0	---	---
EDR Historical Cleaners	EDR Historical Cleaners	0	0	0	---	---

0 = No sites in radius identified

--- = Not Searched

The subject property was not listed in the EDR-provided government database report. No sites with a reported release of hazardous substances or petroleum products to the subsurface were reported within a one-mile radius of the subject property.

In general, only potentially hazardous materials released from facilities located approximately up-gradient and within a few hundred feet of the site, or in a cross-gradient direction close to the site, are judged to have a reasonable potential of migrating to the site. This opinion is based on the assumption that materials generally do not migrate large distances laterally within the soil, but rather tend to migrate with groundwater in the general direction of groundwater flow.

Two orphan sites were identified in the EDR-provided government database report. Based upon SALEM's visual observations made during our site reconnaissance, as well as various influencing factors including approximate distance from the subject property, the orphan sites are deemed to have a low potential to environmentally impact the subject property.

No engineering control sites, sites with institutional controls, or sites with deed restrictions were listed for the subject property, adjacent sites or vicinity properties in the EDR-provided government database report.

No Indian reservations or LUSTs on Indian land were reported on the subject property, adjacent sites or vicinity properties in the EDR-provided government database report.

The remaining properties identified by EDR within the specified search radius of the subject property, which appeared on local, state, or federally published lists of sites that use of have had releases of hazardous materials, were determined through SALEM's field observations to be of sufficient distance and/or situated hydraulically cross/downgradient of the subject property, such that impacts to the subject property are not likely.

9.0 POTENTIAL VAPOR ENCROACHMENT CONDITION

Vapor intrusion is a way by which chemicals in soil and groundwater can migrate into indoor air. Chemical vapors moving up through soil and into a building are a potential source of indoor air contamination and may pose a risk to human health. In evaluating the potential for a vapor encroachment condition (VEC) on the subject property, SALEM attempted to determine if there was information indicating that chemicals of concern were located within the "critical distance", defined as the lineal distance between the nearest edge of a contaminated plume and the nearest target property boundary. Based on ASTM E 2600-10 *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*, the "critical distance" is equal to 100 feet, with the exception of dissolved petroleum hydrocarbons, which have a "critical distance" of 30 feet. If non-aqueous phase petroleum hydrocarbons are present, the 100-foot "critical distance" is utilized.

9.1 Vapor Encroachment Screening

SALEM has performed a Vapor Encroachment Screening (Tier 1) in general accordance with the scope and limitations of ASTM Standard Practice E2600-10 for the subject property. Vapor intrusion is a way by which chemicals in soil and groundwater can migrate into indoor air. Chemical vapors moving up through soil and into a building are a potential source of indoor air contamination and may pose a risk to human health. In evaluating the potential for a vapor encroachment condition (VEC) on the subject property, SALEM attempted to determine if there was information indicating that chemicals of concern were located within the “critical distance”, defined as the lineal distance between the nearest edge of a contaminated plume and the nearest target property boundary. Based on ASTM E 2600-10 *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*, the “critical distance” is equal to 100 feet, with the exception of dissolved petroleum hydrocarbons, which have a “critical distance” of 30 feet. If non-aqueous phase petroleum hydrocarbons are present, the 100-foot “critical distance” is utilized.

TABLE IV
Vapor Encroachment Questionnaire

QUESTION	RESPONSE	COMMENTS
1. Property Type?	Vacant	
2. Are there buildings/structures on the subject property?	No	
3. Will buildings/structures be constructed on the subject property in the future?	Yes	
4. If buildings exist or are proposed, do/will they have elevators?	No	
5. Type of level below grade (existing or proposed)?	Slab-on-Grade (proposed)	
6. Is there ventilation below grade?	N/A	
7. Sump pumps, floor drains, or trenches (existing or proposed)?	No	
8. Radon or methane mitigation system installed?	N/A	
9. Heating system type (existing or proposed)?	Unknown	
10. Type of fuel energy (existing or proposed)?	Unknown	
11. Have there ever been any environmental problems at the subject property?	No	
12. Does/will a gas station operate anywhere on the subject property?	Yes (Proposed)	
13. Do any tenants use hazardous chemicals in relatively large quantities on the subject property?	No	
14. Have any tenants ever complained about odors in the building or experience health-related problems that may have been associated with the building?	Unknown	
15. Are the operations (or proposed operations to be performed) on the subject property OSHA regulated?	No	
16. Are there any existing or proposed under-ground storage tanks (USTs) or above-ground storage tanks (ASTs) located on the subject property?	No	
17. Are there any sensitive receptors (children, elderly, people in poor health, etc.) that occupy or will occupy the subject property?	No	

TABLE V
Additional VEC Criteria

QUESTION	RESPONSE	COMMENTS
1. Is the subject property known to have current or past contamination?	No	
2. Is contamination of the subject property suspected?	No	
3. Is an <u>adjacent</u> property known to have current or past contamination which may have impacted the subject property?	No	
4. Is a <u>nearby</u> property known to have current or past contamination which may have impacted the subject property?	No	

TABLE V (cont'd)
Additional VEC Criteria

QUESTION	RESPONSE	COMMENTS
5. Is regional groundwater contamination known to exist beneath the subject property?	No	
6. Are you aware of other conditions which may result in vapor intrusion at the subject property?	No	

Based upon the results of SALEM's Tier 1 VES, it is SALEM's opinion that a potential VEC "likely does not exist" at the subject property. As such, no further assessment is recommended.

10.0 BUSINESS ENVIRONMENTAL RISKS

10.1 Asbestos-Containing Building Materials

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. Asbestos is commonly used as an acoustic insulator, thermal insulation, fire proofing and in other building materials. Friable asbestos-containing material (ACM), when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. Non-friable ACM can be crumbled, pulverized, or reduced to powder during machining, cutting, drilling, or other abrasive procedures. Friable ACM is more likely to release fibers when disturbed or damaged than non-friable ACM. Exposure to airborne friable asbestos may result in a potential health risk because persons breathing the air may breathe in asbestos fibers. Continued exposure can increase the amount of fibers that remain in the lung. Fibers embedded in lung tissue over time may cause serious lung diseases including: asbestosis, lung cancer, or mesothelioma. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be *presumed* to contain asbestos, for purposes of this regulation. All thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building constructed prior to 1981 and have not been appropriately tested are "presumed asbestos-containing material" (PACM).

During SALEM's site reconnaissance, no structures were observed on the subject property. Therefore, ACMs are not considered an on-site environmental concern at this time.

10.2 Lead-Based Paint

Lead is a highly toxic metal that affects virtually every system of the body. While adults can suffer from excessive lead exposures, the groups most at risk are fetuses, infants and children under 6. The Consumer Product Safety Commission banned the use of lead in paint in 1978. Most manufactures, however, had ceased using lead well before this time. Paint applied after 1978 is not considered suspect LBP. Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as "Title X," to protect families from exposure to lead from paint, dust, and soil. Section 1018 of this law directed the Housing and Urban Development (HUD) and the US EPA to require the disclosure of known information on lead-based paint (LBP) and LBP hazards before the sale or lease of most housing built before 1978. Sellers, landlords, and their agents are responsible for providing this information to the buyer or renter before sale or lease.

According to Section 1017 of Title X, "LBP hazard is any condition that causes exposure to lead from lead-contaminated dust; bare, lead-contaminated soil; or LBP that is deteriorated or intact LBP present on accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects." Therefore, under Title X intact lead-based paint on most walls and ceilings is not considered a "hazard," although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated. LBP is defined as any paint, varnish, stain, or other applied coating that has 1.0 mg/cm² (or 5,000 µg/g by weight) or more of lead.

During SALEM's site reconnaissance, no structures were observed on the subject property. Therefore, LBP is not considered an on-site environmental concern at this time.

10.3 Radon

Radon is a naturally occurring gaseous substance resulting from the radioactive decay of uranium to radium and then to radon. Uranium is a common element found in many geologic formations and substrates, particularly igneous and metamorphic rocks. Radon has a half-life of only 3.8 days and decays to its daughter elements (polonium 218, polonium 214, bismuth 214, and lead 214). It is these daughter elements that represent the health hazard commonly associated with radon. Radon gas can enter a building through cracks in the foundation and walls and become attached to dust particles and inhaled which could cause damage to human lung tissue. Radon is measured in picocuries per liter of air (pCi/L). The EPA has an established safe radon level of 4 pCi/L. Based on the EPA Radon Zone Map of California, the subject Property is located within **EPA Zone 2**, which has a predicted indoor radon screening less than 4 pCi/L (Low Potential). The EDR-provided radon data cites San Bernardino County has having 100% of 1st floor spaces with <4 pCi/L. However, radon levels may vary from one area to another and the only way to accurately assess radon gas levels on the subject property is to conduct a radon gas survey.

10.4 Mold

Molds are microscopic organisms found virtually everywhere, indoors and outdoors. Mold will grow and multiply under the right conditions, needing only sufficient moisture (e.g. in the form of very high humidity, condensation, or water from a leaking pipe, etc.) and organic material (e.g., ceiling tile, drywall, paper, or natural fiber carpet padding). Mold growths often appear as discoloration, staining, or fuzzy growth on building materials or furnishings and are varied colors of white, gray, brown, black, yellow, and green. In large quantities, molds can cause allergic symptoms when inhaled or through the toxins the molds emit.

During SALEM's site reconnaissance, no structures were observed on the subject property. Therefore, mold is not considered an on-site environmental concern at this time.

11.0 DISCUSSION OF FINDINGS

Historical Uses

The subject property comprises two contiguous rectangular-shaped parcels of land totaling approximately 6.75 acres (San Bernardino County APNs 0128-571-16-0000 and 0128-571-24-0000). SALEM's review of historical aerial photographs indicates that a dwelling was located within the eastern boundary of the subject property from at least 1949 until at least 1975. A septic system was likely associated with the former on-site dwelling. However, it is unknown if a septic system is currently located in the vicinity of the former dwelling. The presence of a septic system is not anticipated to adversely impact the subject property due to its presumed use for domestic purposes only. If a septic system is identified during the redevelopment of the subject property, it should be properly abandoned/closed or destroyed in accordance with state and local guidelines.

Review of historical aerial photographs indicates the subject property was utilized for agricultural purposes as a vineyard from at least 1949 until sometime prior to 1975. Based upon the length of time since the subject property was last used for agricultural purposes, it is not anticipated that elevated concentrations of environmentally persistent pesticides would be found in the near-surface soils of the subject property. SALEM's sampling and analysis of surface soils from properties with similar histories has typically yielded non-detectable results for analysis of environmentally persistent pesticides. It is not anticipated that elevated concentrations of environmentally persistent pesticides would be found in the near-surface soils of the subject property and therefore, the former agricultural use of the subject property does not present an REC to the subject property.

Based upon SALEM's review of historical aerial photographs, a site reconnaissance and contacts with the state and local regulatory agencies, there is a low potential for RECs to exist in connection with the historical use of the subject property.

Current Uses

At the time of SALEM's March 28, 2018 site reconnaissance, the subject property was undeveloped land covered with native vegetation. During the visual observations of the subject property, no hazardous materials were observed to be stored or handled on the subject property. Exposed surface soils did not exhibit obvious signs of discoloration. No other obvious evidence (vent pipes, fill pipes, dispensers, etc.) of USTs was noted within the area observed. No standing water or major depressions were observed on the subject property. No indications of former structures, such as foundations, were observed on the subject property. Based on SALEM's, field observations, and contacts with state and local regulatory agencies, the potential for adverse environmental impacts to the subject property associated with current site use appears to be low and therefore, there is a low potential for RECs to exist in connection with the current use of the subject property.

Adjacent Properties

Based on SALEM's field observations, review of the EDR Radius Map Report and consultation with local regulatory agencies, the potential for RECs to exist in connection with the subject property from adjacent property uses appears to be low.

11.1 Evaluation of Data Gaps/Data Failure

In accordance with ASTM E1527-13 guidance, data gaps represent 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 may result from incompleteness in any of the activities required by this practice. Data failure represents the failure to achieve the historical research objects of this practice even after reviewing the standard historical sources that are reasonably ascertainable and likely to be useful. Data failure is one type of data gap. The following is a summary of data gaps encountered in the process of preparing this report including an observation as the presumed significance of that data gap to the conclusions of this assessment.

- Some of the intervals between documented sources exceeded five years.

However, taken in consideration with the available information obtained in the course of preparing this report in conjunction with professional experience, there is no evidence to suggest that these data gaps might alter the conclusions of this assessment.

12.0 SUMMARY AND CONCLUSIONS

We have performed a *Phase I Environmental Site Assessment* in conformance with the scope and limitations of ASTM Practice E1527-13 of the Proposed Commercial Development located at 1100 West Foothill Boulevard in Rialto, California (San Bernardino County APNs 0128-571-16-0000 and 0128-571-24-0000), the *property*. Any exceptions to, or deletions from, this practice are described in Section 13 of this *report*. During the course of this assessment, SALEM identified no evidence of a REC in connection with the subject property as defined by ASTM E1527-13. However, the following site development issue was identified:

- SALEM's review of historical aerial photographs indicates that a dwelling was located within the eastern boundary of the subject property from at least 1949 until at least 1975. A septic system was likely associated with the former on-site dwelling. However, it is unknown if a septic system is currently located in the vicinity of the former dwelling. The presence of a septic system is not anticipated to adversely impact the subject property due to its presumed use for domestic purposes only. If a septic system is identified during the redevelopment of the subject property, it should be properly abandoned/closed or destroyed in accordance with state and local guidelines.

13.0 LIMITATIONS

This Phase I ESA Report has been prepared for the exclusive use of **Property Plus Mobil, LLC** and its subsidiaries and affiliates. Unauthorized use of or reliance on the information contained in this report, unless given express written consent by SALEM, **Property Plus Mobil, LLC**, is strictly prohibited. The following limitations and exceptions apply:

- The scope of work completed was designed solely to meet the needs of SALEM's client. SALEM shall not be liable for any unintended usage of this report by another party. In addition, based on the ASTM guidelines, the ESA is only valid if completed within 180 days of an acquisition or the transaction necessitating the ESA.
- No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. This ESA was designed to reduce, but not eliminate the potential for RECs at the subject property, within reasonable limits of time and cost. The ESA is not intended to be exhaustive or all-inclusive and does not represent a guarantee of the identification of all possible environmental risk.
- An ESA is intended to be a non-intrusive investigation and generally does not include sampling or testing of air, soil, water or building materials. No destructive testing was completed and concealed areas, such as behind walls or within machinery, were not accessed. Testing, if any, is designed solely to meet the needs of the ESA, not to meet any local, state or federal regulations and should not be utilized as such.
- Information in this report is based on personal interviews, government records, published resources, and various historical documents. Accuracy and completeness of information varies among information sources and is often inaccurate or incomplete. The information utilized in this ESA is from sources deemed to be reliable; however, no representation or warranty is made as to the accuracy thereof. SALEM will have no ongoing obligation to obtain and include information that was not reasonably ascertainable, practically reviewable or provided to SALEM in a reasonable timeframe to formulate an opinion and complete the assessment by the agreed upon due date.
- Unless specifically identified in the scope of work, the ESA excludes consideration of non-ASTM scope issues including, but not limited to, lead in drinking water, asbestos, lead-based paint, industrial hygiene, health and safety, endangered species, wetlands, indoor air quality, vapor intrusion, electromagnetic fields, biological agents or mold.
- The ESA includes some information that may be relevant to regulatory compliance, but is not intended and shall not be construed as a compliance audit and cannot be considered a verification of regulatory compliance. While the general environmental setting of the subject property is described, this assessment is not intended to be a formal flood plain or wetland determination, and no warranty

is made thereof. Depending on its past, present or future intended use, the property under review may or may not be subject to regulation and permitting under environmental and health and safety laws, such as, but not limited to, the Clean Air Act, the Clean Water Act, the Solid Waste Disposal Act, the Occupational Safety and Health Act, and other federal, state and local regulations. SALEM assumes no responsibility or liability respecting regulatory permitting or compliance issues.

- Client is advised that if the ESA is obtained with the intent of qualifying the purchaser as an innocent landowner, contiguous property owner, or bona fide prospective purchaser under CERCLA, there will be continuing obligations of due care and responsiveness and additional legal requirements that likely apply to such status. SALEM accepts and undertakes no responsibility as to such requirements and advises that counsel be separately consulted with respect to such requirements.
- The findings and conclusions presented in this Phase I ESA Report are based on field review and observations and on data obtained from the sources listed in the report. The findings of this report are valid as of the present. The passage of time, natural processes or human intervention on the subject property or adjacent properties and changes in the regulations can cause changed conditions which can invalidate the findings and conclusions presented in this report.

14.0 QUALIFICATIONS

This Phase I ESA was conducted under the supervision or responsible charge of SALEM's undersigned environmental professional with oversight from the undersigned registered engineer. The work was conducted in accordance with ASTM E1527-13, generally accepted industry standards for environmental due diligence in place at the time of the preparation of this report, and SALEM's quality-control policies.

We declare that, to the best of our professional knowledge and belief, we meet the definition of environmental professional as defined in §312.10 of 40 CFR 312 and 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 the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

15.0 REFERENCES

The following list summarizes the references utilized in preparing this report:

- Aerial photographs provided by Environmental Data Resources, Inc.
- California Environmental Protection Agency, Recorded Deed Restriction List, 1994.
- California Environmental Protection Agency, Department of Toxic Substances Control records.
- California Regional Water Quality Control Board records.
- Cal-EPA Voluntary Cleanup Program records.
- California Statewide Radon Survey Screening results conducting during 1990-1991.
- City of Rialto Building Division records.
- City of Rialto Fire Department records.
- City of Rialto Planning Department records.
- City of Rialto Water Service Department records.
- Federal and State regulatory agency lists compiled by EDR.
- San Bernardino County Assessor's Office records.

- San Bernardino County Fire Department-Hazardous Materials Division records.
- Sanborn Fire Insurance Maps for Rialto, California (EDR).
- The Munger Map Book, California – Alaska Oil & Gas Fields, Munger Maps – 1999.
- U.S. EPA Federal Superfund Liens List and the U.S. EPA California Liens, 1995.
- U.S. Geological Survey, 7.5 minute San Bernardino South, California topographic quadrangle map, dated 2012.

If you have any questions, or if we may be of further assistance, please do not hesitate to contact our office at (909) 980-6455.

Respectfully submitted,

SALEM Engineering Group, Inc.



Richard McCondichie, EP, CAC
Senior Environmental Project Manager



Clarence Jiang, PE, GE
Project Engineer
RCE No. 50233/ RGE No. 2477



2c: herewith



Photo 1: View of subject property.



Photo 2: View of subject property from the northwest corner facing south.


PHOTOGRAPHS	PROJECT NO. 3-4158-0257	
PROPOSED COMMERCIAL DEVELOPMENT 1100 WEST FOOTHILL BOULEVARD RIALTO, CALIFORNIA	DATE: April 2018	
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Photo 3: View of subject property from the northwest corner facing east.



Photo 4: View of subject property from the northeast corner facing south.


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Photo 5: View of subject property from the northeast corner facing west.



Photo 6: View of subject property from the southwest corner facing north.


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Photo 7: View of subject property from the southwest corner facing east.



Photo 8: View of subject property from the southeast corner facing north.


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Photo 9: View of subject property from the southeast corner facing west.



Photo 10: View of adjoining residential property to the north.


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Photo 11: View of adjoining property to the northwest.



Photo 12: View of adjoining property to the east.



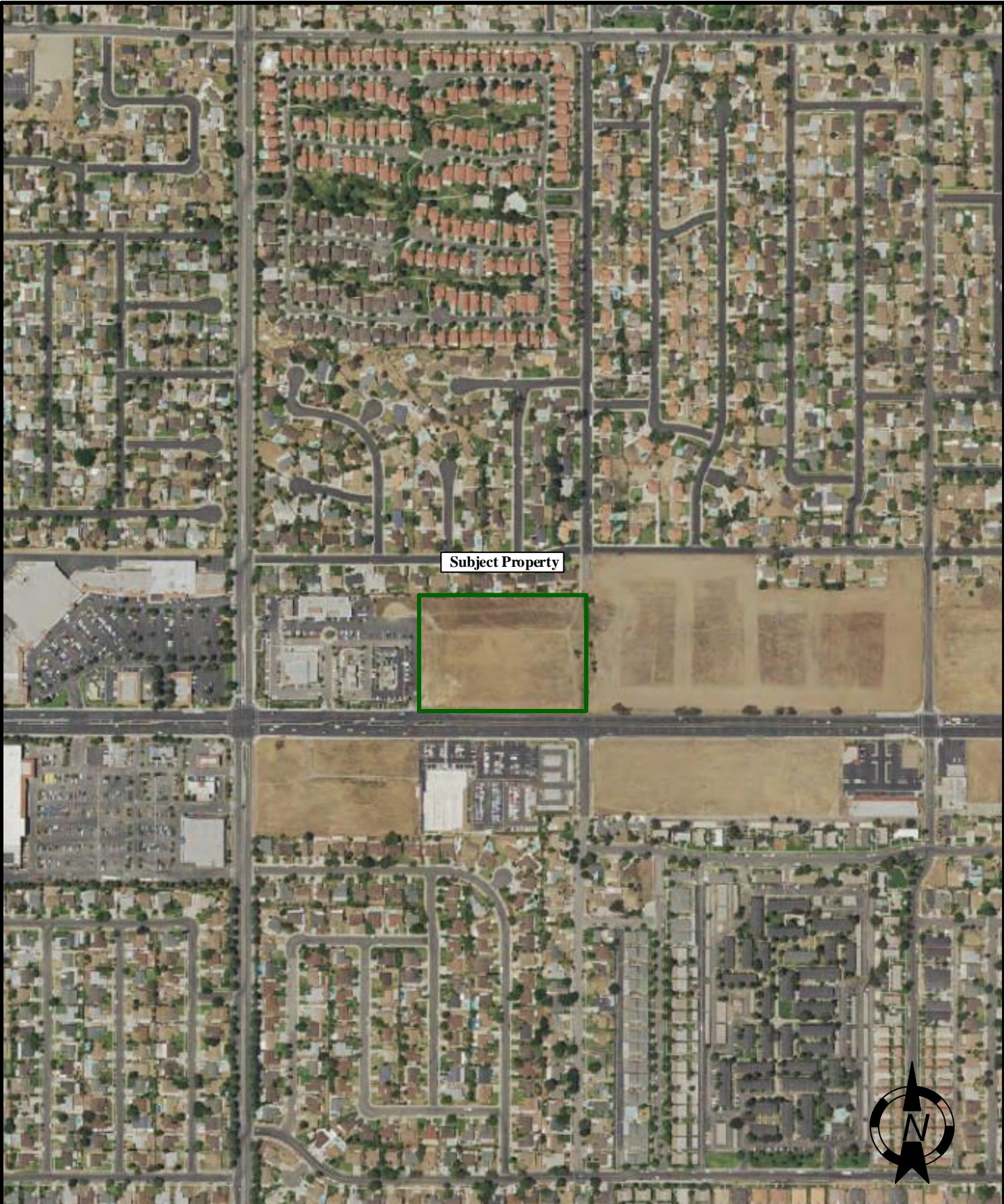
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Photo 13: View of adjoining property to the south.

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Subject Property



AERIAL PHOTOGRAPH (2014) PROPOSED COMMERCIAL DEVELOPMENT 1100 WEST FOOTHILL BOULEVARD RIALTO, CALIFORNIA	SCALE:	DATE:
	NTS	April 2018
	DRAWN BY:	APPROVED BY:
	BR	RM
	PROJECT NO.	FIGURE NO.
	3-418-0257	2





SITE MAP PROPOSED COMMERCIAL DEVELOPMENT 1100 WEST FOOTHILL BOULEVARD RIALTO, CALIFORNIA	SCALE:	DATE:	
	NTS	April 2018	
	DRAWN BY:	APPROVED BY:	
	BR	RM	
	PROJECT NO.	FIGURE NO.	
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