



PHASE I ENVIRONMENTAL SITE ASSESSMENT

Adesa Site

6464 33rd Street
Jurupa Valley, California 92509
Project Number: 1011602535

PREPARED FOR:

Riverside Community College District
3801 Market Street, 3rd Floor
Riverside, California 92501

PREPARED BY:

Atlas Technical Consultants LLC
1180 Durfee Avenue, Suite 125
South El Monte, California 91733

Site Visit Date: May 15, 2024

Report Date: June 6, 2024

Report Viability Date: October 29, 2024



Project Summary

Adesa Site
6464 33rd Street
Jurupa Valley, California 92509
Site Visit Date: May 15, 2024

Property Type: Vacant Land
Gross Site Area (acres): 24.06
Year(s) Built: Not applicable
Building Square Feet (SF): Not applicable

Report Section	No Issues Identified	REC	HREC	CREC	Other	De minimis	Notes
<u>1.2.1</u> SIGNIFICANT DATA GAPS	✓						
<u>3.3</u> CURRENT USES OF ADJOINING PROPERTIES	✓						
<u>4.0</u> USER PROVIDED INFORMATION	✓						
<u>5.2.5</u> HISTORICAL SOURCES FINDINGS AND CONCLUSIONS				✓			(1)
<u>5.4.1</u> SUBJECT PROPERTY DATABASE FINDINGS				✓			(2)
<u>5.4.2</u> SURROUNDING PROPERTIES DATABASE FINDINGS	✓						
<u>5.4.3</u> LOCAL ENVIRONMENTAL RECORDS SOURCES	✓						
<u>6.2.1</u> POLYCHLORINATED BIPHENYLS-CONTAINING ELECTRICAL EQUIPMENT	✓						
<u>6.2.2</u> OTHER CONDITION, FEATURE, OR OPERATION					✓		(3)
<u>7.0</u> SUBSURFACE VAPOR MIGRATION		✓					(4)
<u>8.0</u> INTERVIEWS	✓						
<u>9.1</u> FLOOD PLAIN DOCUMENT REVIEW	✓						
<u>9.2</u> WETLANDS DOCUMENT REVIEW	✓						
<u>9.3</u> RADON DOCUMENT REVIEW	✓						
<u>9.4</u> LEAD IN DRINKING WATER DATA REVIEW	✓						
<u>9.5</u> ENDANGERED/THREATENED SPECIES REVIEW	✓						

(1) The former occupant of the Subject Property, Las Plumas Lumber Co., operated underground storage tanks (USTs) onsite, which have since been removed, resulting in a reported release that impacted the soils. Given that regulatory closure was issued with some impacted soils allowed to remain onsite, and a stipulation that the lead agency be informed of any change in site use, this release is considered to represent a controlled recognized environmental condition (CREC).

(2) See Note 1.

(3) Suspect asbestos-containing materials (ACM) in the form of floor tile and associated black mastic were



observed on remnant building foundations on the Subject Property.

(4) As mentioned in Note 1, a release of diesel fuel impacted the soils and concentrations of total petroleum hydrocarbons (TPH) for diesel at the Subject Property are above the Regional Water Quality Control Board (RWQCB) 2019 Environmental Screening Levels (ESLs) for a commercial/ industrial setting which are 1,200 mg/kg. As such, a vapor encroachment condition (VEC) exists at the Subject Property that is considered a recognized environmental condition (REC).



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SIGNATURE PAGE

Project Information:

Adesa Site
6464 33rd Street
Jurupa Valley, California 92509
Project Number: 1011602535
Reconnaissance Date: May 15, 2024

Site Assessor: Estella Villacorta

Consultant Information:

Atlas Technical Consultants LLC
1180 Durfee Avenue, Suite 125
South El Monte, California 91733
Phone: 323.517.9780
Site Access Contact: Andrew Regenber, Director,
Real Estate and Development, Gafcon

Client Information:

Myra Nava
Riverside Community College District
3801 Market Street, 3rd Floor
Riverside, California 92501

Environmental Professional Statement

We declare that, to the best of our professional knowledge and belief, we meet the definition of *environmental professional* as defined in § 312.10 part of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. We have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Site Assessor and
Environmental
Professional

Signature for Estella Villacorta

Estella Villacorta
Project Manager

Senior Reviewer

Signature for Dawn Merrill
Dawn Merrill
Client Program Manager



1.0 EXECUTIVE SUMMARY

1.1 Subject Property and Area Description

The property that is the subject of this Atlas Technical Consultants LLC (Atlas) Phase I Environmental Site Assessment (ESA) report is located at 6464 33rd Street, Jurupa Valley, California 92509 (the "Subject Property") and consists of a 24.06-acre triangle-shaped parcel of largely vacant land with remnants of former buildings.

The Subject Property is situated southeast of Florine Avenue and southwest of 33rd Street. The surrounding area use is primarily characterized as largely residential use with vacant land. The general topography of the surrounding area is relatively flat and slightly slopes to the south-southeast towards the West Riverside Canal adjacent to the south. Prior to the current development, the surrounding areas were largely agricultural land.

1.2 Findings, Opinions, and Conclusions

Atlas has performed this ESA of the Subject Property in conformance with the scope and limitations of ASTM Standard Practice E1527-21. Any exceptions to, or deletions from, this practice are described in the Purpose and Scope of Work sections of this report. This assessment has revealed the following *recognized environmental conditions and controlled recognized environmental conditions*, in connection with the Subject Property. No *significant data gaps* were identified. Following is a summary of the report's findings, opinions, and conclusions.

Recognized Environmental Conditions (RECs)

- A Vapor Encroachment Condition (VEC) exists at the Subject Property due to a past release of diesel fuel identified during tank removal in 1991. The contaminated soil was excavated and underwent bioremediation for reuse at the Subject Property. Regulatory closure was issued for the release. However, concentrations of total petroleum hydrocarbons (TPH) as diesel are above current Regional Water Quality Control Board (RWQCB) Environmental Screening Levels. Therefore, the VEC is considered to represent a REC.

Controlled Recognized Environmental Conditions (CRECs)

- According to information local agencies and the database report, a leak that contaminated the soils at the Subject Property was reported on January 16, 1991. On January 22, 1991, remediation of the site started and included the removal of three underground storage tanks (USTs) and excavation of contaminated soil from the tank pits. Soil samples collected at various depths beneath the base of excavation were analyzed for TPH and benzene, toluene, xylene, and ethylbenzene (BTEX). TPH concentrations from the 11 soil samples collected ranged from no detection (ND) to 35,000 milligrams per kilogram (mg/kg). BTEX concentrations from the two soil samples collected ranged from ND for benzene, 0.023 to 4.6 mg/kg for toluene, ND to 13 mg/kg for xylenes, and ND to 2.8 mg/kg for ethylbenzene. Soils containing high concentrations of TPH or BTEX (approximately 1,200 cubic yards) were excavated.



Diesel-affected soil remaining in the excavation pit was estimated between 10 to 20 cubic yards. The vertical extent of this contamination was determined to be two feet or less based on angled boring results. Bioremediation of the excavated soil was planned in order to reuse in a low area on the Subject Property. Confirmation samples from the biotreatment cells were collected and results range from 400 to 1,500 parts per million (ppm). The lead agency, the Riverside County Department of Environmental Health (RCDEH), issued a letter dated February 10, 1993, stating no further action was required at that time. However, changes in the present or proposed use of the site may require further site characterization and mitigation activity. It is the property owner's responsibility to notify the RCDEH of any change in report content, future contamination findings, or site usage. Given that contaminated soil remains at the Subject Property and that requirement that the RCDEH be notified of a use change at the Subject Property, the past release represents a CREC.

Historical Recognized Environmental Conditions (HRECs)

- Atlas did not identify evidence of HRECs in connection with the Subject Property.

De Minimis Conditions

- Atlas did not identify evidence of *de minimis* conditions in connection with the Subject Property.

Non-ASTM Scope Considerations/Business Environmental Risks (BERs)

- Atlas observed suspect asbestos-containing materials (ACM) including floor tile and black mastic on remnant building foundations. The presence of suspect ACM is a non-ASTM Scope Consideration.

1.2.1 Significant Data Gaps

Data gaps may have been encountered during the performance of this ESA and are discussed in applicable sections of the report. According to the ASTM Standard Practice E1527-21, data gaps are only significant if "other information and/or professional experience raise reasonable concerns involving the data gap." No *significant data gaps* were identified in this report.

1.3 Recommendations

Based on information collected from the Phase I ESA, Atlas offers the following recommendations:

- Notify the RCDEH if the use of the Subject Property changes (i.e., if it is redeveloped).
- An asbestos survey of the suspect ACM on the remnant building components should be conducted prior to future disturbance/removal of those components.
- Trash / debris should be removed and disposed of at the appropriate facility. Some trash may need to be characterized prior to disposal.
- Since there are no enclosed structures at the Subject Property, no recommendations associated with the identified VEC/REC are offered at this time. However, a vapor mitigation system may be warranted for future structures.



2.0 PURPOSE AND SCOPE OF WORK

2.1 Purpose

The purpose of this ESA was to identify *recognized environmental conditions* (RECs), *controlled recognized environmental conditions* (CRECs), and *historical recognized environmental conditions* (HRECs) in connection with the Subject Property at the time of the site reconnaissance. This report documents the findings, opinions, and conclusions of the ESA.

2.2 Scope of Work

This ESA was conducted in accordance with the ASTM Standard Practice E1527-21, consistent with a level of care and skill ordinarily practiced by the environmental consulting profession currently providing similar services under similar circumstances. Significant additions, deletions, or exceptions to ASTM Standard Practice E1527-21 are noted below or in the applicable sections of this report. The table below summarizes the scope of this ESA, including additional services for conditions beyond the scope of ASTM Standard Practice E1527-21 if authorized by Client. Additional details may be found in the [References](#) and [Scope of Work](#) sections.

ESA SCOPE OF WORK
Phase I ESA
Environmental Liens/AULs Land Title Search
Vapor Encroachment Screen
Supplemental Agency File Review
ESA ADDITIONAL SERVICES
Flood Plain Document Review
Wetlands Document Review
Radon Document Review
Lead in Drinking Water Data Review
Endangered/Threatened Species Review

2.3 Limitations

Atlas has prepared this ESA report using reasonable efforts to identify RECs, CRECs, and HRECs associated with hazardous substances or petroleum products in, on, or at the Subject Property. Findings contained within this report are based on information collected from observations made on the day(s) of the site reconnaissance and from reasonably ascertainable information obtained from certain public agencies and other referenced sources.

The ASTM Standard Practice E1527-21 recognizes inherent limitations for ESAs, including, but not limited to:



- Uncertainty Not Eliminated - An ESA cannot completely eliminate uncertainty regarding the potential for RECs in connection with the Subject Property.
- Not Exhaustive - An ESA is not an exhaustive investigation of environmental conditions on the Subject Property.
- Past Uses of the Subject Property - ESA requirements only require review of standard historical sources at five year intervals. Therefore, past uses of Subject Property at less than five year intervals may not be discovered.

Users of this report should refer to ASTM Standard Practice E1527-21, [References](#), [Terminology](#) and [Scope of Work](#) for further information regarding limitations to the scope of this project.

This report is not definitive and should not be assumed to be a complete and/or specific definition of all conditions above or below grade. Current subsurface conditions may differ from the conditions determined by surface observations, interviews and reviews of historical sources. The most reliable method of evaluating subsurface conditions is through intrusive techniques, which are beyond the scope of this report. Information in this report is not intended to be used as a construction document and should not be used for demolition, renovation, or other Subject Property construction purposes. Any use of this report by any party, beyond the scope and intent of the original parties, shall be at the sole risk and expense of such user.

Atlas makes no representation or warranty that the past or current operations at the Subject Property are, or have been, in compliance with all applicable federal, state and local laws, regulations and codes. This report does not warrant against future operations or conditions, nor does it warrant against operations or conditions present of a type or at a location not investigated. Regardless of the findings stated in this report, Atlas makes no warranty that the Subject Property is free from existing or threatened pollution, and Atlas is not responsible for consequences or conditions arising from facts not fully disclosed to Atlas during the assessment.

An independent data research company provided the government agency database referenced in this report. Information on surrounding area properties was requested for approximate minimum search distances and is assumed to be correct and complete unless obviously contradicted by Atlas's observations or other credible referenced sources reviewed during the assessment. Atlas shall not be liable for any such database firm's failure to make relevant files or documents properly available, to properly index files, or otherwise to fail to maintain or produce accurate or complete records.

Atlas makes no warranty, guarantee or certification regarding the quality, accuracy or reliability of any prior report provided to Atlas and discussed in this ESA report.

Atlas expressly disclaims any and all liability for any errors or omissions contained in any prior reports provided to Atlas and discussed in this ESA report.

Atlas used reasonable efforts to identify evidence of aboveground and underground storage tanks and ancillary equipment on the Subject Property during the assessment. "Reasonable efforts" were limited to observation of accessible areas, review of referenced public records and interviews. These reasonable efforts may not identify subsurface equipment or evidence hidden from view by things including, but not limited to, snow cover, paving, construction activities, stored materials and landscaping.



Any estimates of costs or quantities in this report are approximations for commercial real estate transaction due diligence purposes and are based on the findings, opinions and conclusions of this assessment, which are limited by the scope of the assessment, contractual agreement(s) with client, schedule demands, cost constraints, accessibility limitations and other factors associated with performing the ESA. Subsequent determinations of costs or quantities may vary from the estimates in this report. The estimated costs or quantities in this report are not intended to be used for financial disclosure related to the Financial Accounting Standards Board (FASB) Statement No. 143, FASB Interpretation No. 47, Sarbanes/Oxley Act or any United States Securities and Exchange Commission reporting obligations, and may not be used for such purposes in any form without the express written permission of Atlas.

Atlas is not a professional title insurance or land surveyor firm and makes no guarantee, express or implied, that any land title records acquired or reviewed in this report, or any physical descriptions or depictions of the Subject Property in this report, represent a comprehensive definition or precise delineation of Subject Property ownership or boundaries.

The "Environmental Professional Statement" in this report does not "certify" the findings contained in this report and is not a legal opinion of such Environmental Professional. The statement is intended to document Atlas's opinion that an individual meeting the qualifications of an Environmental Professional was involved in the performance of the assessment and that the activities performed by, or under the supervision of, the Environmental Professional were performed in conformance with the standards and practices set forth in 40 CFR Part 312 per the methodology in ASTM Standard Practice E1527-21 and the scope of work for this assessment.

Per ASTM Standard Practice E1527-21, Section 6, User Responsibilities, the User of this assessment has specific obligations for performing tasks during this assessment that will help identify the possibility of RECs in connection with the Subject Property. Failure by the User to fully comply with the requirements may impact their ability to use this report to help qualify for Landowner Liability Protections (LLPs) under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Atlas makes no representations or warranties regarding a User's qualification for protection under any federal, state, or local laws, rules, or regulations.

In accordance with the ASTM Standard Practice E1527-21, this report is presumed to be viable when it is conducted within 180 days prior to the date of acquisition of the subject property (or, for transactions not involving an acquisition, such as a lease or refinance, the date of the intended transaction). The dates of the components presented in 4.6.2(i), (iii), (iv), and (v) for interviews, review of government records, visual inspections, and declaration by environmental professional, shall be identified in the report. Completion of searches for recorded environmental cleanup liens (4.6.2(ii)) is a user responsibility; however, if the user has engaged the environmental professional to conduct these searches, then that date shall also be identified in the report. Reports older than one year may not meet the ASTM Standard Practice E1527-21 and therefore, the entire report must be updated to reflect current conditions and Subject Property-specific information.



SHELF LIFE SUMMARY		
ASTM E1527-21 Section 4.6	Report Section	Inquiry / Completion Date
Interviews (owners, operators, occupants)	8.0	May 13, 2024
Review of Government Records	5.4	May 2, 2024
Visual Inspections	6.0	May 15, 2024
Searches for recorded environmental cleanup liens ¹	4.0	May 29, 2024
Declaration by the Environmental Professional	Signature Page	June 6, 2024
Report Viability Date: October 29, 2024 (180 days prior to acquisition ²)		

2.4 Significant Assumptions

The assumptions made by the *Environmental Professional* in this report were not considered to have a significant impact on the determination of *recognized environmental conditions* in connection with the Subject Property.

2.5 Special Terms and Conditions (User Reliance)

This report is for the use and benefit of, and may be relied upon by, Riverside Community College District, and any of its affiliates and their respective successors and assigns, in connection with a commercial real estate transaction involving the Subject Property. No third party is authorized to use this report for any purpose. Any use by or distribution of this report to third parties, without the express written consent of Atlas, is at the sole risk and expense of such third party.

-
1. Completion of searches for recorded environmental cleanup liens (4.6.2(ii)) is a User Responsibility; however, if the User has engaged the Environmental Professional to conduct these searches, then that date shall also be identified in the report.
 2. An environmental site assessment meeting or exceeding this practice is presumed to be valid when it is completed less than 180 days prior to the date of acquisition of the subject property (or, for transactions not involving an acquisition, the date of the intended transaction). Under "All Appropriate Inquiries" 40 C.F.R Part 312, EPA defines the date of acquisition as the date on which a person acquires title to the property.)



3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The Subject Property address is 6464 33rd Street, Jurupa Valley, Riverside County, California 92509. According to information obtained from the Riverside County Assessor's Office, the Subject Property is comprised of two parcels of land identified as Parcel Identification Numbers (PINs) 117-110-016 and 177-110-018. A Site Vicinity Map and Site Plan are located in the appendix for [Figures](#), and Site Photographs are provided in the appendix for [Site Photographs](#). The appendix for [Other Supporting Documentation](#) provides a copy of the legal description.

3.2 Property Improvements and Use

The Subject Property is a roughly triangle shaped area consisting of approximately 24.06 acres of vacant land.

The following provides a general description of Subject Property use.

SUBJECT PROPERTY IMPROVEMENTS	
Improvement	Description
Size of Subject Property (approximate)	24.06 acres
General Subject Property Use	Vacant Land
Public Roads	33th Street to the northeast and Florine Avenue to the west
Paved or Concrete Areas (including parking)	Asphalt and concrete paved areas located on a majority of the Subject Property. The flooring and building foundation of a former building in the north area of the Subject Property was observed.
Unimproved Areas	East corner of Subject Property is not developed.
Landscaped Areas	None
Surface Water	None
Potable Water Source	Jurupa Community Services District
Sanitary Sewer Utility/Septic	Jurupa Community Services District
Storm Sewer Utility	City of Jurupa
Electrical Utility	Southern California Edison
Natural Gas Utility	Southern California Gas Company
Number of Buildings/Description	None / N/A
Current Occupancy Status	Vacant
Unoccupied Buildings/Structures	None / N/A



3.3 Current Uses of Adjoining Properties

The following summarizes current uses of the adjoining properties, including environmental conditions, features, or operations that were observed or suspected to be present:

Occupant(s) Name and Current Use	Address	Direction From Subject Property	Potential Environmental Conditions, Features or Operations
Single-family residences	3270-3271 Apple Avenue 3301 and 3270 Florine Avenue	North, beyond 33rd Street and Florine Avenue	None. See Section 5.4.2 for further details related to a database listing for the site at 3250 Florine Avenue.
Jurupa Hills Post Acute, rehabilitation facility with skilled nursing care	6401 33rd Street	Northeast, beyond 33rd Street	None
Single-family residences	3224-3237 Flagstaff Drive 3166-3174 Evans Point Way	East	None
Vacant land and a canal (West Riverside Canal)	None	South	None
Jurupa Community Service District Florine Lift Station, public utility	3564 Florine Avenue	Southwest	An above ground emergency generator, which likely has an internal diesel fuel tank, was observed within the compound. No reported spills or releases.
Single-family residences	3417 - 3581 Florine Avenue 6515-6516 Coloma Way	West and northwest, beyond Florine Avenue	None

Based on a curbside reconnaissance of the surrounding area and documented regulatory status, the adjoining properties are not expected to represent a REC to the Subject Property.



4.0 USER PROVIDED INFORMATION

The following section summarizes information and documentation provided by Riverside Community College District (User) with regard to User Responsibilities outlined in ASTM Standard Practice E1527-21. Documentation may be found in the appendices for [User Provided Documentation](#), the [Other Supporting Documentation](#), or as referenced elsewhere in this report.

A completed questionnaire was not returned to Atlas. The lack of a returned User Questionnaire is considered a data gap. During the completion of this report, Atlas was able to gather enough information regarding the Subject Property such that Atlas does not consider this data gap significant.

USER PROVIDED INFORMATION			
Type of Information	User Provided	Issue Identified	Comments
Environmental Liens or Activity and Use Limitations (AULs)			No environmental liens or AULs were identified for the Subject Property in the environmental lien/AUL search report OR ADD SOURCE or reported to the U.S. Environmental Protection Agency (EPA) and/or the Department of Toxic Substance Control (DTSC). **OR** Environmental liens or AULs were identified for the Subject Property and are discussed further in INSERT SECTION LINK(S).
Owner, Property Manager, and Occupant Information	Yes	None	The User identified Howard An as the property owner, Andrew Regenberg, Director, Real Estate and Development, Gafcon as the property manager, and the site as vacant.
User Provided Documentation	No	N/A	N/A
Specialized Knowledge or Experience of the User	No	N/A	The User did not provide specialized knowledge regarding the Subject Property..
Commonly Known or Reasonably Ascertainable Information	No	N/A	The User did not provide any commonly known or reasonably ascertainable information material to RECs other than that in the client-provided documents, which are included in the appendices and summarized below.
Significant Valuation Reduction for Environmental Issues	No	N/A	The User provided no information regarding a significant valuation reduction for environmental conditions associated with the Subject Property.
Reason for Performing the Phase I ESA	Yes	None	According to information provided by the User, this Phase I ESA will be used in connection with a commercial real estate transaction to identify RECs associated with the Subject Property.

5.0 RECORDS REVIEW

5.1 Physical Setting

The following table summarizes the physical setting of the Subject Property. A copy of the topographic map is included in the appendix for [Figures](#), the sources of information are provided in the [References](#) section, and reproducible copies of the records are provided in the appendix for [Other Supporting Documentation](#).

PHYSICAL SETTING SUMMARY	
Topography	
Elevation (feet above mean sea level [amsl])	880 feet
Surrounding topography	Relatively flat (Source: United States Geological Survey (USGS) 7.5-Minute Series Topographic Map, <i>Fontana, California Quadrangle</i> , dated 2022)
Nearest water body	West Riverside Canal adjacent to the south
Geology	
Bedrock	Quaternary deposits from the - Pleistocene age. General lithology is marine and non marine (continental) sedimentary rocks. Older alluvium, lake, playa, and terrace deposits.
Depth to bedrock (approximately)	More than 0 inches
Soils	
Soil type(s) and description	Delhi: fine sand with high infiltration rates and somewhat excessively drained
Imported fill	No evidence of imported fill soils was identified on the Subject Property or during the review of historical sources.
Hydrology	
Estimated depth to groundwater (below ground surface [bgs])	165 feet (Source: GeoTracker database information for the former leaking underground storage tank [LUST] case at Subject Property)
Assumed groundwater flow direction	South-southeast (Source: USGS Fontana, California Quadrangle map)

5.2 Historical Records Sources

As part of this Phase I ESA, Atlas attempted to develop a history of the previous uses of the Subject Property and surrounding area to help identify past uses that may have resulted in one or more RECs at the Subject Property. Efforts were made to identify the uses of the Subject Property back to the Subject Property's first use or back to 1940, whichever is earlier.



Reasonably ascertainable information concerning the history and background of the Subject Property begins in 1896 and includes a review or an attempt to review aerial photographs, USGS topographic maps, reverse city directories, Sanborn fire insurance maps, online property information (including available building department records, property tax information, zoning/land use records, local assessor's database, USGS, Historic Aerials, and Google Earth), the Environmental Data Resources, LLC (EDR) Exclusive Historical Record database, and personal knowledge of individuals familiar with the Subject Property. Copies of the aerial photographs and other historical documents can be found in the appendices for [Aerial Photographs](#) and [Historical Research Documentation](#), respectively. Supplemental information is presented in the appendix for [Other Supporting Documentation](#) or where referenced.

Historical aerial photographs for the Subject Property were obtained from EDR and online resources (e.g., Google Earth) and reviewed by Atlas. Aerial photographs were reviewed for the following years: 1931, 1938, 1948, 1953, 1967, 1975, 1985, 1990, 1994, 2002, 2005, 2009, 2012, 2016, 2020, and 2024.

Historical topographic maps of the Subject Property and the surrounding area were obtained from EDR and reviewed by Atlas. Topographic maps were reviewed for the following years: 1896, 1898, 1901, 1942, 1943, 1953, 1954, 1967, 1973, 1975, 1980, 2012, 2015, 2018,, 2021, and 2022.

A search for fire insurance maps for the Subject Property and the surrounding area was conducted by EDR. No such maps for the Subject Property and the surrounding area were available.

Reverse city directories for the Subject Property and adjacent properties were obtained from EDR and reviewed by Atlas. The city directories were reviewed (if available) at approximately five-year intervals for the years spanning 1921 through 2020.

Atlas reviewed available historical building department records obtained from City of Jurupa Valley Building Department, on the City of Jurupa Valley website, for information regarding past uses of the Subject Property and the surrounding area. Records were available from 2017 to 2023.

No other readily available historical sources were reviewed.

HISTORICAL RECORDS SOURCES & AVAILABILITY					
Years	Aerial Photographs	Fire Insurance Map	Topographic Maps	City Directories	Other Resource
Not Available		✓			
Prior to 1940	✓		✓	✓	
1940 - 1945			✓	✓	
1946 - 1950	✓			✓	
1951 - 1955	✓		✓	✓	
1956 - 1960				✓	
1961 - 1965				✓	
1966 - 1970	✓		✓	✓	
1971 - 1975	✓		✓		

HISTORICAL RECORDS SOURCES & AVAILABILITY					
Years	Aerial Photographs	Fire Insurance Map	Topographic Maps	City Directories	Other Resource
1976 - 1980			✓	✓	
1981 - 1985	✓			✓	
1986 - 1990	✓			✓	
1991 - 1995	✓			✓	
1996 - 2000				✓	
2001 - 2005	✓			✓	
2006 - 2010	✓			✓	
2011 - 2015	✓		✓	✓	
2016 - 2020	✓		✓	✓	✓
After 2020	✓		✓		✓

Atlas' findings pertaining to Subject Property and surrounding area historical uses are presented in the following tables. Copies of the aerial photographs and other historical documents can be found in the [Aerial Photographs](#) and [Historical Research Documentation](#) appendices, respectively.

5.2.1 Past Uses of Subject Property

PAST USES OF SUBJECT PROPERTY		
Year Interval	Summary	Historical Source(s)
1896 through circa 1936	Undeveloped land. A road bisects the Subject Property.	Aerial photographs Topographic maps City directories
1938 through 1973	Agricultural land. Possibly vacant vegetated land in later years.	Aerial photographs Topographic maps City directories
1973 through 2009	Las Plumas Lumber yard. Several buildings/shelters are observed through out the Subject Property. City directories from 1977 to 2002 identify Las Plumas Lumber as the occupant of the Subject Property.	Aerial photographs Topographic maps City directories
2012 to the 2022	Vacant with the buildings from the lumber yard still in place. In later years it appears to be an outdoor storage facility with a car parking lot. City directories from 2014 identify Rexco, which is known to Atlas to be a development company as the occupant of the Subject Property.	Aerial photographs Topographic maps City directories Building department records

PAST USES OF SUBJECT PROPERTY		
Year Interval	Summary	Historical Source(s)
	Building records on file include those regarding zoning verification and use change. A request for a certificate of non conforming use for an existing outdoor storage facility was denied in 2022.	
2023 to the present	Vacant land; the former buildings have been demolished and remnants of the buildings are visible. Building records include an application for land use change to residential was approved in 2023.	Aerial photographs Topographic maps Current observations Building department records

5.2.2 Past Uses of Adjoining Properties

NORTH		
Year Interval	Summary	Historical Source(s)
Prior to 1931	Undeveloped land.	Aerial photographs Topographic maps
1931 through 1954	Agricultural land to the north and northwest. The northeast adjacent property is vacant, vegetated land, and in later years agricultural land.	Aerial photographs Topographic maps
1967 through the Present	The northern adjoining property is developed with single-family residences and the rehabilitation / acute care facility. Vacant vegetated land is also visible to the northeast and northwest. The vacant land to the northwest is developed into residential properties in later years.	Aerial photographs Topographic maps Current observations City directories

EAST		
Year Interval	Summary	Historical Source(s)
Prior to 1931	Undeveloped land.	Aerial photographs Topographic maps
1938 through 2020	Largely vacant vegetal land with some residential or farming buildings. In later years the buildings are not visible.	Aerial photographs Topographic maps
2023 through the Present	Single-family residences.	Aerial photographs Current observations

SOUTH		
Year Interval	Summary	Historical Source(s)
Prior to 1931	Undeveloped land.	Topographic maps
1931 through the present	Vegetated land and a canal.	Aerial photographs Topographic maps

WEST		
Year Interval	Summary	Historical Source(s)
Prior to 1938	Undeveloped marshland owned by George A. Hero.	Aerial photographs Topographic maps
1938 through the present	The beginning of residential properties started in the 1940s and grading was observed in the 1950s. Single family residences were apparent beginning in 1967. In 2012, the public utility fenced facility is apparent to the southwest.	Aerial photographs Topographic maps Current observations

5.2.3 Past Uses of Surrounding Area

PAST USES OF SURROUNDING AREA		
Year Interval	Summary	Historical Source(s)
Prior to 1931	Largely undeveloped land.	Aerial photographs Topographic maps
1931 to 1954	A mixture of vegetated land with some agriculture.	Aerial photographs Topographic maps
1967 to the present	Development of the surrounding area is largely residential in nature. Vacant land is still visible.	Aerial photographs Topographic maps Current observations City directories

5.2.4 Historical Sources Data Gaps

Interval gaps (greater than five years) were encountered (greater than five years) during the research of historical use information for the Subject Property and the surrounding area between the years of 1902 to 1920. However, based on the review of available historical sources, environmental databases, interviews, and other documentation and no significant land-use changes during these intervals, these data gaps did not have an impact on the REC determinations of this assessment and are not significant data gaps.



5.2.5 Historical Sources Findings and Conclusions

As early as 1938, the Subject Property was used as agricultural land. It has been our experience that agriculturally related chemicals, including pesticides and herbicides, may have been used where there has been agricultural land use. Near-surface soils may have, therefore, at one time contained these compounds. However, it also has been our experience that during site grading, near-surface soils are reworked. Based on the fact that all agricultural use has ceased, and the Subject Property was redeveloped with the lumber yard and associated paved parking area circa 1970s, Atlas concludes that there is a low likelihood that agriculturally related chemicals are present at elevated concentrations in near-surface soils at the Subject Property. The historical agricultural presence is not representative of a release that has likely impacted the Subject Property and, therefore, is not a REC.

The former tenant, Las Plumas Lumber Co., did have a reported release that impacted the soils and is further discussed in Section 5.4.1.

A review of past historical sources of the adjoining properties and the surrounding area did not reveal evidence of RECs to the Subject Property.

5.3 Prior Assessments

No prior assessment documentation was provided or reviewed.

5.4 Standard Environmental Records

The regulatory agency database report discussed in this section, provided by EDR of Shelton, Connecticut, was reviewed for information regarding the reported use or release of hazardous substances and petroleum products on or near the Subject Property. Unless otherwise noted, the information provided by the regulatory agency database report and other sources referenced in this report were considered sufficient for REC, CREC, HREC, or *de minimis* condition determinations without conducting supplemental agency file reviews. Atlas also reviewed the "unmappable" (also referred to as "orphan") listings within the database report, cross-referencing available address information and facility names. Unmappable sites are listings that could not be plotted with confidence but are potentially in the general area of the Subject Property based on the partial street address, city, or zip code. Unmappable sites identified by Atlas as being within the approximate minimum search distance from the Subject Property, based on the site reconnaissance and/or cross-referencing to mapped listings, are included in the discussion within this section.

The following is a summary of the regulatory agency database review findings. Only those databases with listings identified within the approximate minimum search distance from the Subject Property are included below. The complete regulatory agency database report may be found in the appendix for the Regulatory Database Report.

NR = Not Researched

TP = Target Property



Regulatory Report Summary

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
RCRA NonGen / NLR	0.250	0	4	10	NR	NR	14
CERS HAZ WASTE	0.250	0	0	3	NR	NR	3
SWRCY	0.500	0	0	2	0	NR	2
Notify 65	1.000	0	0	0	1	1	2
RCRA-SQG	0.250	0	0	1	NR	NR	1
ENVIROSTOR	1.000	0	0	0	0	1	1
HIST CORTESE	0.500	1	0	2	4	NR	7
UST FINDER RELEASE	0.500	1	0	2	4	NR	7
Cortese	0.500	1	0	2	3	NR	6
FINDS	0	1	NR	NR	NR	NR	1
WDS	0	1	NR	NR	NR	NR	1
CIWQS	0	1	NR	NR	NR	NR	1
LUST	0.500	2	0	4	6	NR	12
CPS-SLIC	0.500	2	0	0	0	NR	2
HWTS	0	2	NR	NR	NR	NR	2
HAZNET	0	2	NR	NR	NR	NR	2
CERS	0	2	NR	NR	NR	NR	2
RGA LUST	0	3	NR	NR	NR	NR	3

5.4.1 Subject Property Database Findings

The Subject Property was identified in the following federal, state, and tribal agency databases searched.

Las Plumas Lumber Company, LLC (former occupant)
 6464 33rd Street
 Jurupa Valley, California 92509

Database(s): LUST, CPS-SLIC, CORTESE, HIST CORTESE, CERS, HWTS, HAZNET, RGA LUST, WDS, CIWQS, FINDS, and UST FINDER Release

Approximate Distance/Direction from the Subject Property: N/A

Assumed Groundwater Gradient: N/A

Regulatory Data Summary:



The CalEPA Regulated Site Portal database (CERS) combines data about environmentally regulated sites and facilities in California into a single database. These activities include hazardous materials and waste, state and federal cleanups, impacted ground and surface waters, and toxic materials. The former occupant was identified on CERS as a Leaking Underground Storage Tank (LUST) Cleanup Site.

The LUST, Cleanup Program Sites (CPS)-Spills, Leaks, Investigations, and Cleanups (SLIC), Cortese Hazardous Waste and Substances Sites List (CORTESE), and HIST CORTESE are lists maintained by the State Water Resource Control Board and are listed on GeoTracker, the Water Boards data management system for the sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater. RGA LUST is an EDR database that compiles information from the these lists. Underground Storage Tank (UST) Finder Release data is a national composite of LUST sites. According to information from GeoTracker and EDR, a leak that contaminated the soils at the Subject Property was reported on January 16, 1991. On January 22, 1991, remediation of the site started and included the removal of three underground storage tanks (USTs): a 550-gallon waste oil tank located to the west of a shop, one 5,000-gallon gasoline tank east of shop, and one 10,000-gallon diesel tank also east of shop, and removal of contaminated soil from the pit. A fence was placed around the excavation site and the contaminated soil was stockpiled on site. Soil samples collected at various depths beneath the base of excavation were analyzed for total petroleum hydrocarbons (TPH), and benzene, toluene, xylene, and ethylbenzene (BTEX). A Risk Assessment for Underground Storage Tanks Excavation for Las Plumas Lumber Company was completed and documented in a report dated July 2, 1991. Supplemental data to the risk assessment was issued on July 17, 1991. According to the report, on-site contamination remained at the site. The findings of the risk assessment were the following:

- TPH concentrations from the 11 soil samples collected ranged from no detection (ND) to 35,000 milligrams per kilogram (mg/kg). BTEX concentrations from the two soil samples collected ranged from ND for benzene, 0.023 to 4.6 mg/kg; for toluene, ND to 13 mg/kg for xylenes, and ND to 2.8 mg/kg for ethylbenzene. Soils containing high concentrations of TPH or BTEX (approximately 1,200 cubic yards) were excavated.
- Diesel-affected soil remaining in the excavation pit was estimated between 10 to 20 cubic yards. The vertical extent of this contamination was determined to be two feet or less based on angled boring results.
- The facility is underlain by approximately 165 feet of fine textured soils, so depth to groundwater is estimated at 165 feet bgs.
- Computation simulations determined that TPH and BTEX would not likely leach to the groundwater.
- For a hypothetical excavation site at the Subject Property, the calculated excess lifetime cancer risk for the excavation worker is 7.15×10^{-9} , well below the United States Environmental Protection Agency (USEPA) acceptable guideline of 10^{-6} and the State of California Department of Health Services acceptable guideline of 10^{-7} . The hazard index (HI) non-cancer risks for exposure to constituents detected in the soils was 0.00649, which is well below the USEPA and California DHS acceptable guidelines of 1.0. Exposure to constituents detected at the facility would result in risk levels below acceptable guidelines defined for protection of public health.

Bioremediation of the excavated soil was planned in order to reuse it in a low area on the Subject Property. Confirmation samples from the biotreatment cells were collected and results range from 400 to 1,500 parts per million (ppm).



The lead agency, Riverside County Department of Environmental Health (RCDEH), issued a letter dated February 10, 1993, stating no further action was required at that time. However, changes in the present or proposed use of the site may require further site characterization and mitigation activity. It is the property owner's responsibility to notify the RCDEH of any change in report content, future contamination findings, or site usage.

Facility and Manifest Data (HAZNET) is extracted from the copies of hazardous waste manifests received each year by the Department of Toxic Substances Control (DTSC). Las Plumas Lumber Co. was listed on this database for the disposal of unspecified oil-containing waste, other empty containers, oil/water separation sludge, contaminated soil from site clean-up, unspecified oil-containing waste, tank bottom waste, and other organics via various methods.

The DTSC maintains the Hazardous Waste Tracking System (HWTS). Las Plumas Lumber Co listed on HWTS as specialized freights (except used goods) trucking, long-distance.

The Facility Index System (FINDS) contains both facility information and 'pointers' to other sources that contain more detail. Ls Plumas Cumber was listed on the GeoTracker cleanup sites and LUST databases.

The California Integrated Water Quality System (CIWQS) database indicates that the facility was an active permit holder for stormwater related to industrial - lumber and other building materials dealers activities. The permit was terminated on August 23, 2021. No violations related to this listing were found.

The Waste Discharge System is a database managed by the State Water Resources Control Board and lists sites which have been issued waste discharge requirements. Las Plumas Lumber is identified as an industrial facility that is a minor threat to water quality. No violations are listed in this database.

Discussion: Given that contamination remained on site and that regulatory closure was granted with the condition that if site usage changed the lead agency had to be notified, the LUST case represents a CREC to the Subject Property.

5.4.2 Surrounding Properties Database Findings

The following listing(s) with a known or significant potential for release and impact in, on, or at the Subject Property were identified in the federal, state, and tribal agency databases searched.

Enrique Cervantes
3250 Florine Avenue
Jurupa Valley, California 92509

Database(s): RCRA Nongen / NLR

Approximate Distance/Direction from the Subject Property: Adjacent / North, beyond 33rd Street

Assumed Groundwater Gradient: Upgradient

Regulatory Data Summary: The Resource Conservation Recovery Act (RCRA) Nongenerator (Nongen) / No Longer Regulated (NLR) listing identified this facility as not a generator of RCRA regulated hazardous waste as of November 22, 2019.

Discussion: Based on the lack of violations and lack of other evidence indicative of a release, the listing of this site on the above-mentioned database does not represent a REC to the Subject Property.



Based on distance, topography, assumed groundwater gradient, current regulatory status, and/or the absence of reported releases, none of the other sites listed in the federal, state, or tribal agency databases are considered to represent a likely past, present or material threat of release in, on, or at the Subject Property. Given the physical setting characteristics of the Subject Property and surrounding area (e.g., historical records, site reconnaissance observations, nature of the database listings, or absence of reported releases) supplemental agency file reviews were not warranted to verify the database report information.

5.4.3 Local Environmental Records Sources

The following table describes interviews and/or file reviews with local and state regulatory agencies. If a response is received that changes the conclusions presented in this report, an addendum will be forwarded. Reproducible records are included in the appendix for Other Supporting Documentation.

Source	Date Contacted	Information Received	Comments
Riverside County Department Environmental Health	05/14/24		A request for records was submitted electronically as required by the RCDEH. The records are pending.
Regional Water Quality Control Board (RWQCB) GeoTracker	05/16/24	✓	A search of the RWQCB GeoTracker online database was conducted; records for the Subject Property are discussed in Section 5.4.1.
South Coast Air Quality Management District (AQMD)	05/29/24	✓	A search of the AQMD online database was conducted; records for the Subject Property included inactive permits to operate for a service station storage and dispensing equipment and amine treating equipment. The permits were issued from 1982 to 1990 and are inactive. A violation for installing and operating an aboveground storage and dispensing tank with a capacity greater than 251 gallons was noted on April 14, 2008. In addition, the tank was cited for operating without a balanced vapor recovery. The violation was returned to compliance on October 9, 2009 and no open violations were noted.
California Department of Conservation, Division of Oil, Gas, and Geothermal Resources	05/10/24	✓	No oil/gas wells were identified on or in the immediate vicinity of the Subject Property during a review of the California

Source	Date Contacted	Information Received	Comments
			Department of Conservation, Division of Oil, Gas, and Geothermal Resources Oil & Gas Interactive Web Map.
City of Jurupa Valley Building Department	05/29/24	✓	A search of the this agency's online database was conducted; records from 2017 to 2023 were found for the Subject Property and are discussion in Section 5.4.1.
Riverside County Assessor's Office	05/29/24	✓	A search of this agency's online database was conducted; information provided was for the property characteristics (i.e., size, legal description, and current use). No environmental concerns were noted in the information reviewed.
City of Jurupa Valley Planning Division	05/20/24	✓	According to the City of Jurupa Valley Zoning Map, the Subject Property is located in Zone M-SC-5, a manufacturing area.
Department of Toxic Substances Control	05/10/24		No records were available for the Subject Property.

No additional local environmental records sources were reviewed.



6.0 SITE RECONNAISSANCE

The following is a summary of the date, participants, and weather conditions associated with the site reconnaissance.

SITE OBSERVATION SUMMARY	
Date	May 15, 2024
Atlas Assessor	Estella Villacorta, Project Manager
Escorted By	N/A; unescorted
General Weather Conditions	70 to 72 degrees Fahrenheit, cloudy, light drizzle, no visibility issues

6.1 Methodology and Limiting Conditions

The site reconnaissance consisted of visual and/or physical observations of the Subject Property and improvements; adjoining sites as viewed from the Subject Property; and the surrounding area based on visual observations made during the trip to and from the Subject Property as described below.

METHODOLOGY AND LIMITING CONDITIONS		
Subject Property Areas	Methodology	Notes
Exterior	Atlas observed the exterior conditions, improvements, and operations of the Subject Property from safely accessible common areas, roads, and/or the understood perimeter boundaries. Significant exterior features were observed when safely accessible.	No limiting conditions.
Adjoining Properties	Atlas observed properties adjoining the Subject Property from safely accessible adjacent public roads and/or along the understood Subject Property perimeter boundaries.	No limiting conditions.

6.2 Site Reconnaissance Summary

The following is a summary of visual and/or physical observations of the Subject Property and adjoining properties on the day of the site visit. If applicable, conditions, features, or operations observed, likely present, or identified from interviews, records review, or prior reports will be discussed below the table. Photographs can be found in the appendix for [Site Photographs](#).

SITE RECONNAISSANCE SUMMARY		
Feature	Observed or Identified? (Location)	Conclusion(s)
Hazardous Substances	Not observed or identified.	N/A



SITE RECONNAISSANCE SUMMARY		
Feature	Observed or Identified? (Location)	Conclusion(s)
Underground Storage Tanks (USTs)	Not observed or identified.	N/A
Aboveground Storage Tanks (ASTs)	Not observed or identified.	N/A
Other Petroleum Products	Not observed or identified.	N/A
Railroad Spurs	Not observed or identified.	N/A
Pipeline Markers	Not observed or identified.	N/A
PCB-Containing Electrical Equipment	Yes - two pole-mounted transformers were observed in the northeast portion of the Subject Property.	No concerns
Hydraulic Equipment	Not observed or identified.	N/A
Unidentified Substance Containers	Not observed or identified.	N/A
Nonhazardous Solid Waste	Not observed or identified.	N/A
Wastewater	Not observed or identified.	N/A
Waste Pits, Ponds or Lagoons	Not observed or identified.	N/A
Drains	Not observed or identified.	N/A
Sumps/Ejectors	Not observed or identified.	N/A
Septic Systems	Not observed or identified.	N/A
Stormwater Management Systems	Not observed or identified.	N/A
Wells	Not observed or identified.	N/A
Other Condition, Feature, or Operation	Yes - trash debris scattered throughout the Subject Property. Suspect asbestos-containing materials (ACMs) was observed.	Non-ASTM scope

6.2.1 Polychlorinated Biphenyls-Containing Electrical Equipment

Atlas observed two pole-mounted transformers near the northeastern portion of the Subject Property. The transformers were not labeled as to their PCB content as viewed from the ground. The transformer units are owned and operated by Southern California Edison, which is responsible for the maintenance of the transformer units. No evidence of stains or leaks was observed at the time of the site visit.

6.2.2 Other Condition, Feature, or Operation

Atlas observed trash / debris along the perimeter and scattered throughout the the Subject Property that included paper, plastic, wood, metal drums (unknown contents), tires, etc.

Atlas observed foundations of former buildings with flooring material including black mastic and floor tile, which are suspect ACMs.



7.0 SUBSURFACE VAPOR MIGRATION

Atlas conducted a Tier 1 vapor encroachment screen (VES) in accordance with ASTM E2600-22 *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions* for potential vapor encroachment conditions (VECs). A VEC is the presence or likely presence of chemicals of concern (COC) vapors in the vadose zone of the Subject Property caused by the release of vapors from contaminated soil and/or groundwater either on or near the Subject Property. A Tier 2 Non-Invasive Data Collection Screen was performed if prior assessment reports or regulatory documents were readily available.

Atlas considered the nature and extent of on-site and nearby sources of potential subsurface vapor migration by evaluating the current and historical usage of the Subject Property, the construction type and history, the physical setting, and the potential sources of subsurface vapor migration through the review of regulatory agency database information and/or prior reports to identify contaminated properties.

COC includes volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), volatile inorganic analytes, and petroleum hydrocarbons in most circumstances. Certain metals and radionuclides can represent VECs based on the known volatility of the constituents but are uncommon. The vadose zone is between the land surface and the water table, within which moisture content is less than saturation (except in the capillary fringe), and pressure is less than atmospheric. Conditions may exist where there could be no vadose zone, such as the case of a building foundation sitting below the water table. In this case, it may be possible for COC vapors to adversely impact the indoor air without migrating through a vadose zone.

The default area of concern (AOC) is the approximate minimum search distance measured from the Subject Property boundary to a contaminated property with known or suspected COC contamination of soil and/or groundwater. If COC and/or petroleum hydrocarbon COC are used or stored on the Subject Property, or there is an institutional control recorded on the Subject Property for these COC, then the Subject Property is included in the default AOC.

The default AOC was adjusted based on a review of groundwater flow direction, subsurface characteristics, surficial features, man-made features, known release information, and local knowledge. When groundwater flow direction can be estimated or determined, the crossgradient or downgradient radius distances can be significantly reduced.

The adjusted AOC are defined as the following distances from the Subject Property boundary:

Tier 1 Screening	Petroleum COC AOC Distance (LNAPL)	Petroleum COC AOC Distance (Non-LNAPL)	Non-Petroleum COC AOC Distance
Upgradient	528 feet	528 feet	1,760 feet
Crossgradient	165 feet	95 feet	365 feet
Downgradient	100 feet	30 feet	100 feet



As discussed in Section 5.4.1, a release of diesel fuel impact the soils at the Subject Property and bioremediated soils with 400-1,500 ppm (or mg/kg) of TPH were reused at the Subject Property. Concentrations of TPH for diesel at the Subject Property are above the RWQCB 2019 Environmental Screening Levels (ESLs) for a commercial/ industrial setting which are 1,200 mg/kg. As such, a VEC exists at the Subject Property that is considered a REC.



8.0 INTERVIEWS

The following persons were interviewed to obtain information regarding RECs in connection with the Subject Property; not included in this listing are those government employees that were contacted solely for the purpose of retrieving public information pertaining to the Subject Property and who would not be expected to have firsthand knowledge of RECs at the Subject Property (see Section 5.4.3 for details regarding records reviews).

INTERVIEW SUMMARY					
Role	Name	Title/Company	Type	# Attempts	Response?
Site Manager	Andrew Regenberg	Director, Real Estate and Development / Gafcon	Email	One	Yes

Atlas was not provided contact information for the property owner Howard An; therefore, a direct interview was not completed in 2024. However, all questions were directed to the site representative, Andrew Regenberg, Director, Real Estate and Development with Gafcon. This represents a potential data gap; however, based on the review of other historical and regulatory sources, this data gap is not considered significant. Pertinent information from the interviews is discussed in applicable sections of this report.



9.0 ADDITIONAL SERVICES

The following additional services beyond the scope of ASTM Standard Practice E1527-21 were included in the scope of work for this ESA and are discussed further below.

9.1 Flood Plain Document Review

Atlas reviewed the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the City of Jurupa Valley, California, Community-Panel Number 06065C0043G, dated August 28, 2008. The Subject Property is located in Zone X, defined as an "Area of Minimal Flood Hazard". A copy of the flood plain map is included in the [Other Supporting Documentation](#) appendix.

9.2 Wetlands Document Review

Atlas reviewed the United States Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI) Wetlands Online Mapper website for documented wetlands at the Subject Property. A riverine wetland is depicted on the southeast adjacent property. A copy of the NWI map is included in the [Other Supporting Documentation](#) appendix.

9.3 Radon Document Review

Radon is a naturally occurring colorless, odorless gas that is a by-product of the decay of thorium or uranium when present in indigenous bedrock, soil, or, in rare cases, well water. The United States Environmental Protection Agency (EPA) guidance action level for annual residential exposure to radon is 4.0 picoCuries per liter of air (pCi/L). Radon testing is not a regulatory requirement for private owners of commercial real estate, but comparing testing results to the guidance action level is commonly done to suggest whether further action to test or limit radon exposure at a building may be prudent.

Atlas' review of published radon data indicates that the Subject Property is located in EPA Radon Zone 2, an area of moderate propensity with regard to the potential for elevated levels of radon gas. One site was tested within the Subject Property zip code (92509) with an average of 0.900 pCi/L in the first-floor living area.

9.4 Lead in Drinking Water Data Review

Atlas confirmed with the Jurupa Community Services District that potable water is supplied to the Subject Property by the municipality. According to the Water Quality Report for the Jurupa Community Services District (provided in the [Other Supporting Documentation](#) appendix), the municipally supplied water meets all drinking water standards, including those for lead. Lead in drinking water testing was not conducted for this ESA.



9.5 Endangered/Threatened Species Review

Atlas reviewed the United States Fish and Wildlife Service (USFWS) Information Planning and Conservation System (IPaC) to determine if the Subject Property was located in an area of final or proposed critical habitat. According to the USFWS, critical habitat “identifies specific areas that have the physical and biological features that are essential to the conservation of a listed species, and that may require special management considerations or protection.” A copy of the IPaC project environmental review receipt is included in the [Other Supporting Documentation](#) appendix.

The IPaC records indicate there are no critical habitats at this location.

The IPaC records indicate there are no protected migratory birds within the project area. There are 19 birds that warrant special attention in the project area, including the Allen's Hummingbird, Bald Eagle, Belding's Savannah Sparrow, Bullock's Oriole, California Gull, California Thrasher, Clark's Grebe, Common Yellowthroat, Golden Eagle, Lawrence Goldfinch, Northern Harrier, Nuttall's Woodpecker, Oak Titmouse, Olive-sided Flycatcher, Santa Barbara Song Sparrow, Tricolored Blackbird, Western Grebe, Western Screech-owl, and Wrentit. Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures.

The IPaC records indicate there are no refuge lands nor fish hatcheries. One riverine wetland is located on the southeast adjacent property.

A review of the USFWS County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species list identified endangered species or threatened species within Riverside County, California. The following is a list of the Federally-Listed Threatened, Endangered, Proposed, and Candidate Species.

County	Species	Status	Critical Habitat
Riverside	San Bernardino Merriam's Kangaroo Rat	Endangered	No
Riverside	Coastal California Gnatcatcher	Threatened	No
Riverside	Least Bell's Vireo	Endangered	No
Riverside	Southwestern Pond Turtle	Proposed Threatened	No
Riverside	Western Spadefoot	Proposed Threatened	No
Riverside	Santa Ana Sucker	Threatened	No
Riverside	Delhi Sands Flower-loving Fly	Endangered	No
Riverside	Monarch Butterfly	Candidate	No
Riverside	San Diego Ambrosia	Endangered	No
Riverside	Slender-horned Spineflower	Endangered	No



10.0 REFERENCES

ASTM International. *E1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. West Conshohocken, PA; ASTM International, 2021. DOI: 10.1520/E1527-21.

ASTM International. *E2091-22 Standard Guide for Use of Activity and Use Limitations, Including Institutional and Engineering Controls*. West Conshohocken, PA; ASTM International, 2022. DOI: 10.1520/e2091-22.

ASTM International. *E2600-22 Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*. West Conshohocken, PA; ASTM International, 2022. DOI: 10.1520/E2600-22.

California, State of, Department of Conservation CalGEM Online Mapping System website, <https://maps.conservation.ca.gov/doggr/>.

California, State of, Department of Conservation Geologic Map of California dated 2010.

California, State of, Environmental Protection Agency, Department of Toxic Substances Control, EnviroStor website, <http://www.envirostor.dtsc.ca.gov/public>.

California, State of, Regional Water Quality Control Board, GeoTracker website, <http://geotracker.swrcb.ca.gov>.

EDR, *Certified Sanborn® Map Report*, Adesa Site, 6464 33rd Street, Jurupa Valley, California, Inquiry Number 7640302, dated May 2, 2024.

EDR, *EDR Historical Topo Map Report with QuadMatch™*, Adesa Site, 6464 33rd Street, Jurupa Valley, California, Inquiry Number 7640302, dated May 2, 2024.

EDR, *The EDR Aerial Photo Decade Package*, Adesa Site, 6464 33rd Street, Jurupa Valley, California, Inquiry Number 7640302, dated May 2, 2024.

EDR, *The EDR-City Directory Image Report*, Adesa Site, 6464 33rd Street, Jurupa Valley, California, Inquiry Number 7640302, dated May 2, 2024.

EDR, *The EDR Radius Map™ Report with GeoCheck®*, Adesa Site, 6464 33rd Street, Jurupa Valley, California, Inquiry Number 7640302, dated May 2, 2024.

EPA. VISL Calculator, https://epa-visl.ornl.gov/cgi-bin/visl_search.

EPA Cleanups in My Community database, <https://ofmpub.epa.gov/apex/cimc/f?p=cimc:map:::71>.

EPA Envirofacts database, <https://enviro.epa.gov/index.html>.

EPA, Site-Specific National Cleanup Databases, <https://www.epa.gov/cleanups/site-specific-national-cleanup-databases>.



FEMA FIRM, for Jurupa Valley, California Community-Panel Number 06065C0043G, dated August 28, 2008.

FEMA, FEMA Flood Map Service Center Website <https://msc.fema.gov/portal/home>.

Google Earth, <https://www.google.com/earth/>.

Jurupa Valley, City of, jurupavalley.org.

Jurupa Community Services District. Drinking Water Quality Report, dated 2022.

Riverside County Department Environmental Health, records request.

Security First Title Resource, *Environmental Lien and AUL Search*, Adesa Site, 6464 33rd Street, Jurupa Valley, California, dated May 29, 2024.

South Coast Air Quality Management District online database, <https://www.aqmd.gov/nav/FIND>.

USFWS Information Planning and Conservation System (IPaC), <https://ipac.ecosphere.fws.gov/>.

USDA. Natural Resources Conservation Service, Web Soil Survey, <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.

USFWS, National Wetland Inventory Mapper, <http://www.fws.gov/nwi/>.

USGS Topographic Map, Fontana, California Quadrangle Map, 7.5 Minute Series, dated 2022



11.0 TERMS & ACRONYMS

The following provides definitions and descriptions of key terms and acronyms that may be used in this report. *Italics indicate terms that are defined by ASTM Standard Practice E1527-21. The Standard Practice should be referenced for further detail (such as the precise wording), related definitions, or additional explanation regarding the meaning of terms.*

all appropriate inquiries - that inquiry constituting all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined in CERCLA, 42 U.S.C §9601(35)(B), that will qualify a party to a commercial real estate transaction for one of the threshold criteria for satisfying the LLPs to CERCLA liability (42 U.S.C §9601(35)(A) & (B), §9607(b)(3), §9607(q); and §9607(r)), assuming compliance with other elements of the defense.

activity and use limitations - legal or physical restrictions or limitations on the use of, or access to, a site or facility: (1) to reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil, soil vapor, groundwater, and/or surface water on the property, or (2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. These legal or physical restrictions, which may include institutional and/or engineering controls, are intended to prevent adverse impacts to individuals or populations that may be exposed to hazardous substances and petroleum products in the soil, soil vapor, groundwater, and/or surface water on the property.

bona fide prospective purchaser liability protection - (42 U.S.C. §9607(r)) - a person may qualify as a bona fide prospective purchaser if, among other requirements, such person made "all appropriate inquiries into the previous ownership and uses of the facility in accordance with generally accepted good commercial and customary standards and practices." Knowledge of contamination resulting from all appropriate inquiries would not generally preclude this liability protection. A person must make all appropriate inquiries on or before the date of purchase. The facility must have been purchased after January 11, 2002.

business environmental risk (BER) - a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated in this practice. Consideration of BER issues may involve addressing one or more non-scope considerations, some of which are identified in ASTM Standard Practice Section 13.

chemical(s) of concern (COC) - chemical that is present in the subsurface environment, has a vapor pressure greater than 1 mm of mercury, or a Henry's Law Constant greater than 1×10^{-5} atm m³/mole at ambient temperature and pressure, and can potentially migrate as a vapor into the vadose zone of the Subject Property.

contiguous property owner liability protection - (42 U.S.C. §9607(q)) - a person may qualify for the contiguous property owner liability protection if, among other requirements, such person owns real property that is contiguous to, and that is or may be contaminated by hazardous substances from other real property that is not owned by that person. Furthermore, such person conducted all appropriate inquiries at the time of acquisition of the property and did not know or have reason to know that the property was or could be



contaminated by a release or threatened release from the contiguous property. The all appropriate inquiries must not result in knowledge of contamination. If it does, then such person did "know" or "had reason to know" of contamination and would not be eligible for the contiguous property owner liability protection.

controlled recognized environmental condition (CREC) - a recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations)

data failure - a failure to achieve the historical research objectives in 8.3.1 through 8.3.2.2 even after reviewing the standard historical sources in 8.3.4.1 through 8.3.4.8 that are reasonably ascertainable and likely to be useful. Data failure is one type of data gap.

data gap - 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, including, but not limited to site reconnaissance (for example, an inability to conduct the site visit), and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.).

de minimis condition — is a condition that generally does 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 the appropriate governmental agencies. Conditions determined to be *de minimis* are not RECs nor *controlled recognized environmental conditions*.

engineering controls (EC) — physical modifications to a site or facility (for example, capping, slurry walls, or point of use water treatment) to reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or groundwater on a property. Engineering controls are a type of activity and use limitation (AUL).

environmental lien - a charge, security, or encumbrance upon title to a property to secure the payment of a cost, damage, debt, obligation, or duty arising out of response actions, cleanup, or other remediation of hazardous substances or petroleum products upon a property, including (but not limited to) liens imposed pursuant to CERCLA 42 U.S.C. §§9607(1) & 9607(r) and similar state or local laws.

environmental professional - a person meeting the education, training, and experience requirements as set forth in 40 CFR §312.10(b). The person may be an independent contractor or an employee of the user.

fill dirt - dirt, soil, sand, or other earth, that is obtained off-site, that is used to fill holes or depressions, create mounds, or otherwise artificially change the grade or elevation of real property. It does not include material that is used in limited quantities for normal landscaping activities.

hazardous substance - a substance defined as a hazardous substance pursuant to CERCLA 42 U.S.C. §9601(14), as interpreted by EPA regulations and the courts:" (A) any substance designated pursuant to section 1321(b)(2)(A) of Title 33, (B) any element, compound, mixture, solution, or substance designated pursuant to section 9602 of this title, (C) any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Resource Conservation and Recovery Act of 1976 (RCRA), as amended, (42 U.S.C. §6921) (but not including any waste the regulation of which under RCRA



(42 U.S.C. §§6901 et seq.) has been suspended by Act of Congress), (D) any toxic pollutant listed under section 1317(a) of Title 33, (E) any hazardous air pollutant listed under section 112 of the Clean Air Act (42 U.S.C. §7412), and (F) any imminently hazardous chemical substance or mixture with respect to which the Administrator (of EPA) has taken action pursuant to section 2606 of Title 15. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (A) through (F) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas)."

hazardous waste - any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of RCRA, as amended, (42 U.S.C. §6921) (but not including any waste the regulation of which under RCRA (42 U.S.C. §§6901-6992k) has been suspended by Act of Congress). RCRA is sometimes also identified as the Solid Waste Disposal Act. RCRA defines a hazardous waste, at 42 U.S.C. §6903, as: "a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may - (A) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (B) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed."

hazardous waste/contaminated sites - sites on which a release has occurred, or is suspected to have occurred, of any hazardous substance, hazardous waste, or petroleum products, and that release or suspected release has been reported to a government entity.

historical recognized environmental condition (HREC) - a previous release of hazardous substances or petroleum products affecting the Subject Property and has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). A *historical recognized environmental condition* is not a *recognized environmental condition*.

innocent landowner defense - (42 U.S.C. §§9601(35) & 9607(b)(3)) - a person may qualify as one of three types of innocent landowners: (i) a person who "did not know and had no reason to know" that contamination existed on the property at the time the purchaser acquired the property; (ii) a government entity which acquired the property by escheat, or through any other involuntary transfer or acquisition, or through the exercise of eminent domain authority by purchase or condemnation; and (iii) a person who "acquired the facility by inheritance or bequest." To qualify for the innocent landowner defense, such person must have made all appropriate inquiries on or before the date of purchase. Furthermore, the all appropriate inquiries must not have resulted in knowledge of the contamination. If it does, then such person did "know" or "had reason to know" of contamination and would not be eligible for the innocent landowner defense.

Landowner Liability Protections (LLPs) - landowner liability protections under CERCLA; these protections include the bona fide prospective purchaser liability protection, contiguous property owner liability protection, and innocent landowner defense from CERCLA liability. See 42 U.S.C. §§9601(35)(A), 9601(40), 9607(b), 9607(q), 9607(r).



material threat - a physically observable or obvious threat which is reasonably likely to lead to a release that, in the opinion of the environmental professional (EP), is threatening and might result in impact to public health or the environment.

migrate/migration - refers to the movement of hazardous substances or petroleum products in any form, including, for example, solid and liquid at the surface or subsurface, and vapor in the subsurface.

petroleum products, n—those substances included within the meaning of the petroleum exclusion to CERCLA, 42 U.S.C. § 9601(14), as interpreted by the courts and EPA, that is: petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under Subparagraphs (A) through (F) of 42 U.S.C. § 9601(14), natural gas, natural gas liquids, liquefied natural gas, and synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

property use limitation - limitation or restriction on current or future use of a property in connection with a response to a release, in accordance with the applicable regulatory authority or authorities that allows hazardous substances or petroleum products to remain in place at concentrations exceeding unrestricted use criteria.

recognized environmental condition(s) (REC) - (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. *A de minimis condition is not a recognized environmental condition.*

safety data sheets - written or printed material that is prepared by chemical manufacturers and importers for distributors and employers use that provides comprehensive information regarding a hazardous chemical pursuant to OSHA's Hazard Communication Standard (HCS), 29 CFR § 1910.1200.

significant data gap - a data gap that affects the ability of the environmental professional to identify a *recognized environmental condition*.

site reconnaissance - that part that is contained in ASTM E1527-21 Section 9 of this practice and addresses what should be done in connection with the site visit. The site reconnaissance includes, but is not limited to, the site visit done in connection with such a Phase I Environmental Site Assessment.

site visit - the visit to the property during which observations are made constituting the site reconnaissance section of this practice.

Subject Property - the property that is the subject of the environmental site assessment described in Section 1.1 that is the subject of this ESA report.

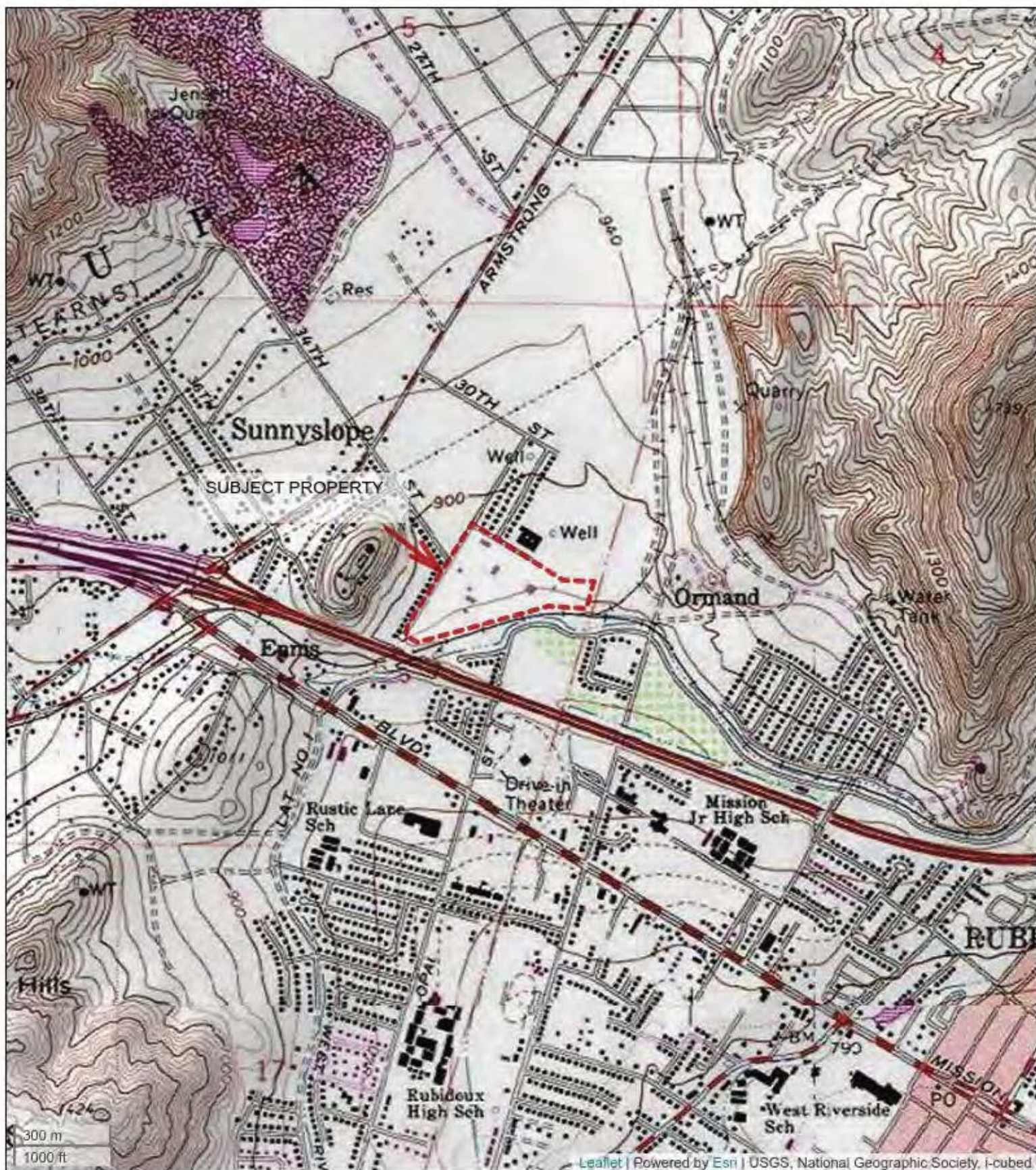
USGS 7.5 Minute Topographic Map - USGS Topographic Map, including the current US Topo 7.5-Minute Series or the historical 7.5-Minute Topographic Series, which is available from the United States Geologic Survey and showing the Subject Property.



Units - The values stated in inch-pound units are to be regarded as the standard. The values given in parentheses are mathematical conversions to SI units that are provided for information only and are not considered standard.

visually and/or physically observed - during a site visit pursuant to this practice, this term means observations made by vision while walking through a property and the structures located on it and observations made by the sense of smell, particularly observations of noxious or foul odors. The term "walking through" is not meant to imply that disabled persons who cannot physically walk may not conduct a site visit; they may do so by the means at their disposal for moving through the property and the structures located on it.

Figures



SITE VICINITY MAP

Adesa Site

6464 33rd Street

Jurupa Valley, California 92509

ATLAS Project No. 1011602535



ATLAS



Site Plan

Adesa Site

6464 33rd Street

Jurupa Valley, California 92509

ATLAS Project No. 1011602535



Site Photographs



1 : View of Subject Property looking southwest



2 : View of Subject Property looking southwest and of pole-mounted transformer



3 : View of the pole-mounted transformer



4 : View of the access gate along 33rd Street



5 : View of the Subject Property looking south



6 : View of the remnant foundation of a building



7 : View of floor tile and black mastic on remnant foundation



8 : Close up view of floor tile and black mastic on remnant foundation



9 : View of Subject Property looking east



10 : View of Subject Property looking east



11 : Subject Property looking northeast, drum of unknown contents



12 : Trash debris observed on Subject Property



13 : Subject Property looking northeast



14 : View of Subject Property looking east



15 : View of the eastern portion of the Subject Property



16 : View of Subject Property looking north along Florine Avenue



17 : View of residential properties to the north of the Subject Property



18 : View of northeast adjacent property (6401 33rd Street)



19 : View of the residences to the east of the Subject Property



20 : View of the residential properties to the northeast along 33rd Street



21 : View of northeast and east adjacent properties (vacant land and residences)



22 : View of the south adjacent property (vacant land)



23 : Southwest adjacent property (3564 Florine Avenue)



24 : West adjacent properties along Florine Avenue