

Received

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**PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT
936 VANCE AVENUE, SAMOA, CA 95564
APN: 401-112-030 (EXCLUDING THE CHIP SILO)**



Prepared for:

Ms. Aria Cox
North Wind Management
936 Vance Ave, Samoa, CA 95564

November 28, 2022

Prepared by:
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of



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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. 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. The qualifications of the Environmental Professionals are included in Appendix A.

Freshwater Environmental Services



Scott Ferriman
Project Scientist



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1.0 INTRODUCTION

Freshwater Environmental Services (FES) has prepared this Phase I Environmental Site Assessment (Phase I ESA) for the property located at 936 Vance Avenue (Subject Property) approximately 4,000 feet southwest of the unincorporated Humboldt County community of Samoa as shown on Figures 1 and 2. The Subject Property includes APN 401-112-030 which covers an area of approximately 19 acres. The chip silo area (approximately 5,850 square feet) is excluded from this Phase I ESA as shown on Figures 2 and 3.

This Phase I ESA was prepared for the exclusive use and benefit of North Wind Management, LLC, and regulatory agencies.

This Phase I ESA conforms to American Society for Testing and Materials (ASTM) E1527-21 “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process” (ASTM, 2021). This report is organized as recommended in ASTM E1527-21.

Figures 1 through 4 show the Subject Property location, topographic map, site plan, and analytical results from borings and monitoring wells. Figures 5 and 6 show some of the findings listed in the 2013 Phase I ESA by LACO Associates, Inc. and 2020 Phase I ESA by GHD respectively. Photographs 1 through 22 show various areas of the Subject Property.

1.1 Purpose

The purpose of this Phase I ESA is to identify Recognized Environmental Conditions (RECs) associated with the Subject Property. The term REC means (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.

This report will include listing of historical RECs and controlled RECs if applicable. A historical REC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). A past release that qualified as a historical recognized environmental condition may no longer qualify as a historical recognized environmental condition if new conditions or information have been identified such as, among other things, a change in regulatory criteria or a subsequently identified migration pathway that was not previously known or evaluated.

A controlled REC is a REC 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).

RECs do not include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be subject to any enforcement action if brought to the attention of appropriate government agencies.

1.2 Detailed Scope of Work

This Phase I ESA conforms to the work described in ASTM E1527–21.

1.3 Significant Assumptions

There were no significant assumptions used to generate this report.

1.4 Limitations and Exceptions

No environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Performance of ASTM E1527-21 is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and the practice recognizes reasonable limits of time and cost.

1.5 Special Terms and Conditions

No special terms or conditions are related to this investigation.

1.6 User Reliance

This Phase I ESA was prepared for the exclusive use of North Wind Management, LLC, and regulatory agencies.

2.0 SITE DESCRIPTION

2.1 Location and Legal Description

The Subject Property is located within Humboldt County California approximately 4,000 feet southwest of the unincorporated community of Samoa.

The Subject Property is bordered to the north by a vegetated area between Vance Ave and New Navy Base Road and to the east by a vacant area and the former chip storage yard. The southeast portion of the Subject Property is adjacent to the former pulp mill and the southwest portion is adjacent to the landfill associated with the former pulp mill. New Navy Base Road is adjacent to the western boundary of the Subject Property. A railroad grade is present to the west of Vance Ave which extends from the north to the southern boundary of the Subject Property. The area of the Subject Property between Vance Ave and New Navy Base Road is vegetated and does not contain any structures. The chip silo is excluded from the Subject Property as shown on Figures 2 and 3.

Most of the developed area of the Subject Property has been graded with an elevation of approximately 15 to 20 feet above mean sea level. The Subject Property location is shown on Figures 1 and 2.

2.2 Site and Vicinity General Characteristics

The Subject Property west of Vance Ave is mostly vegetated. The area east of Vance Ave includes a vegetated area between Vance Ave with most of the area paved and includes the main office and the former personnel office.

2.3 Current Use of the Property

Most of the Subject Property is vacant.

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

Access to the Subject Property is from Vance Ave. Most of the eastern portion of the Subject Property is paved and includes the main office and the former personnel office. The chip silo is present west of the offices. The chip silo is a tall concrete structure that was part of the conveyance system that moved wood chips from the chip storage yard north and east of the Subject Property. The chip silo and an approximately 5-foot buffer around it is not included in this Phase I ESA.

2.5 Current Uses of Adjoining Properties

Adjacent property uses are listed in the table below.

Direction from the Site	Activity
West	New Navy Base Road with vegetated dunes to the west. The beach and Pacific Ocean are west of the dunes.
North	Small, vegetated area to the northwest with log storage to the northeast.

East	Mostly vacant former chip storage yard.
South	Partially demolished former pulp mill.

2.6 Site Background

The Subject Property was developed in 1964 as part of a pulp mill. The pulp mill operated using a chlorine-bleaching process until it was converted into a chlorine-free operation in 1994. The mill shut down in October 2008 and has not operated since. Freshwater Pulp Company owned the site from February 2009 to August 2013, and was involved with decommissioning and demolition of various components of the mill. In August 2013, Freshwater Pulp Company transferred ownership of the former pulp mill facility to the Humboldt Bay Harbor Recreation and Conservation District. In September 2014, the U.S. Environmental Protection Agency completed the removal of spent pulping liquors that were previously stored in multiple onsite aboveground storage tanks.

3.0 USER PROVIDED INFORMATION

3.1 Title Records

A preliminary title report was not provided for this report.

3.2 Environmental Liens or Activity and Use Limitations

Aria Cox (current owner representative) was not aware of any environmental liens or activity and use limitations.

3.3 Specialized Knowledge

Aria Cox (current owner representative) did not have specialized knowledge regarding the Subject Property.

3.4 Commonly Known or Reasonably Ascertainable Information

Aria Cox (current owner representative) was not aware of any environmental cleanups that occurred on the Subject Property.

3.5 Valuation Reduction for Environmental Issues

Aria Cox (current owner representative) indicated that the Subject Property was offered for sale at a fair market value without value reduction for environmental issues.

3.6 Owner, Property Manager and Occupant Information

The current owner of the Subject Property is listed as North Wind Management LLC Co based on data downloaded from Parcel Quest on November 25, 2022.

4.0 RECORDS REVIEW

4.1 Standard Environmental Record Sources

FES contracted with Environmental Data Resources (EDR), a company specializing in the acquisition and compilation of local, state, and federal environmental records, to acquire the ASTM required records. EDR has provided a Radius Map Report which is provided in Appendix G. EDR searched the Subject Property and surrounding area for standard environmental records as required by ASTM E1527-21. The search radius for each database complies with ASTM E1527-21. A complete listing of the databases searched, abbreviations and the radius searched are included in the EDR Radius map report.

The Subject Property (936 Vance Ave) is listed in two environmental databases. The first listing is for a Certified Unified Program Agency (CUPA) spill/complaint filing. The CUPA program is administered by Humboldt County. The second listing is for a Facility Index System (FINDS). These listings are related to a raid by the Humboldt County Sheriff's Office on an unpermitted cannabis cultivation and hash lab in the personnel building on January 11, 2019. The complaint was resolved by July 2019.

There are multiple listings for the former pulp mill. The listings include:

- **AST** (Aboveground Storage Tank listing)
- **BROWNFIELDS** (Considered Brownfields Sites Listing)
- **CA CORTESE** (Hazardous Waste & Substances Sites List CAL EPA/Office of Emergency Information)
- **CA CPS-SLIC** (Statewide SLIC Cases (GEOTRACKER) State Water Resources Control Board)
- **CERS** (California Environmental Reporting System)
- **CHMIRS** (California Hazardous Material Incident Report System)
- **CIWQS** (California Integrated Water Quality System)
- **CUPA: Certified Unified Program Agency:** (Hazardous Materials Program of the Humboldt County Division of Environmental Health)
- **ECHO** (Enforcement & Compliance History Information Environmental Protection Agency)
- **EMI** (ARB Toxics and criteria pollutant emissions data)
- **ERNS** (Emergency Response Notification System)
- **FINDS** (Facility Index System)
- **HAZNET** (Facility and Manifest Data Environmental Protection Agency)
- **HWTS** (Hazardous Waste Tracking System Department of Toxic Substances Control)
- **ICIS** (Integrated Compliance Information System)
- **LUST** (Leaking Underground Storage Tank)

- **RCRA-LQG** (Large Quantity Generators of Hazardous Waste)
- **TSCA** (Toxic Substances Control Act)

Most of these listings are for the south-adjacent property where the pulp mill operated. There was an underground storage tank that leaked near the blower building. The case was closed on September 4, 2003. The tank location was probably at least 100 feet beyond the Subject Property. There were numerous spills on the south-adjacent property while the pulp mill was in operation. Many of the spills remained in the secondary containment system until they were released to the ocean outfall. There were no indications that the spills impacted the Subject Property.

Additional sites within 1/8 mile from the Subject Property were reviewed and are not anticipated to have had a negative environmental impact on the Site based on distance and environmental activities reported.

A list of sites that are unmappable due to an improper address is included in the EDR report. The Samoa Pulp Mill is listed in the SEMS and PRP databases. These listings are for the removal of hazardous waste from the south-adjacent property after the ownership was transferred to the Humboldt Bay Harbor, Recreation, & Conservation District in 2013. The other unmappable sites are not anticipated to have had a negative environmental impact on the Subject Property due to environmental activity and location.

Other sites listed in the EDR Radius Map report are unlikely to have had a negative impact on the Subject Property due to distance from the Subject Property, groundwater flow direction, and the reported environmental activities.

4.2 Additional Environmental Record Sources

FES was provided the text and two figures from a 2013 Phase I ESA by LACO Associates, Inc. (LACO) and one complete previous Phase I ESA by GHD from 2020. The Phase I ESAs are included in Appendix B and described below.

LACO Phase I ESA (April 24, 2013)

LACO prepared a Phase I ESA for Humboldt County that included the Subject Property and additional parcels as shown on Figure 5. The following table lists one Historical REC and 23 RECs from *Section 12 Conclusions* from the LACO report. The RECs are listed in the order from the LACO report. The third column in the table indicates whether the REC is located inside or outside of the current Subject Property. The fourth column lists the general facility type associated with the REC.

REC #	LACO 2013 Phase I ESA Recognized Environmental Condition	Location in relation to the Subject Property	Facility	Comment
1	The Underground Storage Tank (UST) Area, located near the chip blower, is classified as a Historical REC (HREC)	Outside	Blower	Historical REC

REC #	LACO 2013 Phase I ESA Recognized Environmental Condition	Location in relation to the Subject Property	Facility	Comment
2	The hydraulic cylinders near the chip blower	Outside	Blower	
3	The diesel fuel above ground storage tank (AST)	Outside	Loader Fueling	
4	Truck dump #3 hydraulic pump outbuilding	Outside	Truck Dump	
5	Truck dump #3 hydraulic cylinders and secondary containment	Outside	Truck Dump	
6	Truck dump #4 hydraulic cylinders	Outside	Truck Dump	
7	Truck dump #4 ground surface staining	Outside	Truck Dump	
8	Backstop fence creosote impregnated posts and planks	Outside	Chip Backstop	
9	Railroad tracks (creosote impregnated ties)	Inside	Railroad Tracks	
10	Chip silo western stoker rooms	Inside	Chip Silo	Excluded from this Phase I ESA
11	Surface staining of ground adjacent to the western stoker rooms	Inside	Chip Silo	Excluded from this Phase I ESA
12	Stoker building	Inside	Chip Silo	Excluded from this Phase I ESA
13	Soil staining on the northern side of the stoker building	Inside	Chip Silo	Excluded from this Phase I ESA
14	Subterranean room at the chip silo	Inside	Chip Silo	Excluded
15	Transformer south of the main office	Inside	Transformer	No evidence of leakage
16	Car wash sump	Inside	Car Wash	Structure has been demolished

REC #	LACO 2013 Phase I ESA Recognized Environmental Condition	Location in relation to the Subject Property	Facility	Comment
17	Electrical substation A/D	Outside	Blower	
18	Electrical substation F	Outside	Blower	
19	Chip blower lube room	Outside	Blower	
20	Chip blower hydraulic pump room	Outside	Blower	
21	Chip blower compressor room	Outside	Blower	
22	Chip blower leach field	Outside	Blower	
23	Tractor fueling area	Outside	Loader Fueling	
24	Historical fill from Humboldt Bay	Unknown	Fill	Unknown extent

GHD Phase I ESA (April 30, 2020)

GHD prepared a Phase I ESA for Janssen Malloy LLC that included the Subject Property and one parcel as shown on Figure 6. The following table lists the six RECs from *Section 5.2 Conclusions* from the GHD report. The RECs are listed in the order from the GHD report. The third column in the table indicates whether the REC is located inside or outside of the current Subject Property. The fourth column lists the general facility type associated with the REC.

REC #	GHD 2020 Phase I ESA Recognized Environmental Condition	Location in relation to the Subject Property	Facility	Comment
1	Potential Hydraulic Oil Releases – Chip Silo Elevator	Inside	Chip Silo	Excluded from this Phase I ESA
2	Subterranean Room – Chip Silo	Inside	Chip Silo	Excluded from this Phase I ESA
3	Potential Chemical Impacts from Historical Applications	Outside	Pulp Mill	Applies to south-adjacent property
4	Likely Migration of Impacts from Adjoining Property (Landfill, Samoa Pulp Mill)	Outside	Pulp Mill	

REC #	GHD 2020 Phase I ESA Recognized Environmental Condition	Location in relation to the Subject Property	Facility	Comment
5	Likely Impacts from Septic System	Inside	Septic	
6	Likely Groundwater Migration Impacts from Adjoining Manufacturing Facility (Samoa Pulp Mill)	Outside	Pulp Mill	

The State of California GeoTracker database was reviewed to identify additional potentially contaminated properties near the Subject Property. No additional sites were found that are likely to have had a negative impact on the Subject Property due to distance from the Subject Property, groundwater flow direction, and the reported environmental activities

4.3 Physical Setting Sources

The United States Geologic Survey (USGS) 7.5-minute topographic map entitled Eureka, California, including the Subject Property and surrounding area was reviewed and is included as Figure 2. The eastern portion of the Subject Property is nearly level with an elevation of approximately 15 to 20 feet above mean sea level. Humboldt Bay is located approximately 835 feet east of the Subject Property. The Pacific Ocean is located approximately 550 feet west of the Subject Property.

4.4 Historical Use Information on the Property

Information in this section of the report is based on acquisition and review of various historical sources including historical aerial photographs, historical topographic maps, previous reports, and previous reports.

Based on a review of historical data sources, the oldest documentation is a 1933 topographic map that shows the railroad and Vance Ave extending through the Subject Property.

4.4.1 Historical Aerial Photographs

Aerial photographs from 1941, 1954, 1957, 1969, 1974, 1983, 1990, 2005, 2009, 2012, and 2016, were obtained from EDR. The EDR aerial photographs are included in Appendix C. The 2022 aerial photograph was downloaded from Google Earth Pro and included as Figure 3.

The aerial photographs were reviewed, and the following observations were made.

Historical Aerial Photographs	
1941	The 1941 photo shows Vance Ave extending through the Subject Property similar to the current alignment. The area to the east of Vance Ave is almost entirely dune sands with the area to the west containing some dunes and vegetated areas. Railroad tracks are present near the western edge of Vance Ave. The surrounding properties appear undeveloped.
1954	The 1954 photo appears similar to the 1941 photo with some vegetation growing in the dunes to the east of Vance Ave.
1957	The 1957 photo appears similar to the 1954 photo.
1969	The 1969 photo shows that the pulp mill has been constructed on the south-adjacent property and is in operation. The north-adjacent chip storage area is covered with wood chips. Most of the currently existing buildings are present. The current parking area does not appear to have been paved and there are no vehicles in that area. The chip silo is present but it does not appear to be connected to the south-adjacent pulp mill. There appears to be activity in the southwest corner of the Subject Property west of Vance Ave.
1974	The 1974 photo has poor resolution but appears similar to the 1969 photo. New Navy Base Road has been constructed adjacent to the western boundary of the Subject Property. The chip silo appears connected to the pulp mill with a conveyance system.
1983	The 1983 photo appears similar to the 1974 photo but the pulp mill is not operating and there are only a few vehicles present. The parking area west of Vance Ave has been paved.
1990	The 1990 photo shows that the pulp mill is operating and there are numerous vehicles in the paved parking area west of Vance Ave.
2005	The 2005 photo shows that the pulp mill is operating and the chip storage yard is covered with chips.
2009	The 2009 photo shows that the pulp mill is not operating and there are no wood chips in the chip storage area.
2012	The 2012 photo shows that portions of the pulp mill have been demolished and the conveyance system from the chip silo is no longer present. There do not appear to be any vehicles present on the Subject Property or on the south-adjacent property.

2016	The 2016 photo appears similar to the 2012 photo with some additional demolition of the pulp mill on the south-adjacent property.
2022	The 2022 photo appears similar to the 2016 photo. A fence has been built along the Subject Property boundary to the north and east of Vance Ave. The area to the east of the northern portion of the Subject Property is being used for log storage.

4.4.2 Historical Topographic Maps

Historical topographic maps from 1933, 1942, 1947, 1951, 1958, 1959, 1972, 2012, 2015, and 2018 of the Subject Property and surrounding area were provided by EDR. The EDR topographic maps are included in Appendix D. The historical topographic maps were reviewed, and the following observations were made.

Historical Topographic Maps	
1933	The 1933 map shows Vance Ave and the railroad tracks to the west.
1942	The 1942 map appears similar to the 1933 map.
1947	The 1947 is appear almost identical to the 1942 map.
1951	The 1951 map appears similar to the 1947 map. The railroad tracks are labeled Hammond Lumber.
1958	The 1958 map appears similar to the 1951 map. The railroad tracks are labeled Logging Railroad.
1959	The 1959 map appears similar to the 1958 map.
1972	The 1972 map shows the office and personnel buildings on the Subject Property. The main pulp mill buildings and some of the tanks area shown on the south-adjacent property.
1972	The 1972 map shows the office and personnel buildings on the Subject Property. The main pulp mill buildings and some of the tanks area shown on the south-adjacent property. New Navy Base Road has been constructed adjacent to the western boundary of the Subject Property.
2012	The 2012 topographic map appears similar to the 1972 map.
2015	The 2015 topographic map appears similar to the 2012 map.
2018	The 2018 topographic appears similar to the 2015 map.

4.4.3 Historical City Directories

Historical City Directory data from 1992, 1995, 2005, 2010, 2014, and 2017 were provided by EDR and are included in Appendix E. There are no listings for the Subject Property (936 Vance Ave). The nearest address listed in the City Directory report was for the Arcata Community Recycling Center at 555 Vance Ave in 2010.

4.4.4 Sanborn Fire Insurance Maps

Historical Sanborn Fire Insurance Maps do not cover the Subject Property.

4.5 Historical Use Information on Adjoining Properties

North-adjacent Property

Based on a review of aerial photos, the adjacent property to the north is vegetated and has never been developed.

East-adjacent Property

Based on a review of aerial photos, the adjacent property to the east consisted of sand dunes until it was developed in the early 1960's for wood chip storage for the south-adjacent pulp mill.

West-adjacent Property

Based on a review of aerial photos, the adjacent property to the west was developed for New Navy Base Road by the time of the 1974 aerial photograph.

South-adjacent Property

Based on a review of aerial photos, the adjacent property to the south consisted of sand dunes with some vegetation in the west until it was developed in the early 1960's as a pulp mill with and associated landfill to the west.

5.0 SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

The Subject Property was inspected by Scott Ferriman of FES on November 14, 2022. Photographs from the site reconnaissance are included in this report as Photographs 1 through 22.

5.2 General Site Setting

The Subject Property includes an area of approximately 19 acres. The portion of the Subject Property west of Vance Ave consists of vegetated dunes. There is a strip of vegetation east of Vance Ave approximately 150 feet wide with a paved parking area to the east. The area east of Vance Ave is completely fenced. The developed area of the Subject Property is relatively flat with one drain inlet southwest of the main office building.

5.3 Exterior Observations

A concrete slab covering a septic tank was observed near the former location of the guard shack. There is a slab present at the south end of the parking lot where there was a former enclosed car wash for employees. There are two office buildings present on the Subject Property. The main office building is partially two-story with two one-story wings that extend to the south. The exterior of the main office building is in very good condition. The personnel office is a one-story building located along the southern boundary. The exterior of the personnel office is in good condition.

5.4 Interior Observations

The main office building contains numerous offices. The interior of the main office building is in very good condition. The personnel office contains mostly small offices and is in good condition.

6.0 INTERVIEWS

6.1 Interview with Owner

The Subject Property is owned by North Wind Management, LLC. An environmental questionnaire was not completed by the property owner.

6.2 Interview with Site Manager

No Site Manager was available for interview.

6.3 Interviews with Occupants

No Occupants were available for interview.

6.4 Interviews with Local Government Officials

FES contacted Mr. Norm Crawford of the Humboldt County Environmental Health Division on November 28, 2022 regarding the Subject Property.

7.0 FINDINGS AND OPINIONS

The findings from the 2013 LACO Phase I ESA and the 2020 GHD Phase I ESA are shown on Figures 5 and 6 respectively.

1. **Finding:** The EDR report included a CUPA listing for a spill complaint at the Subject Property. The complaint was filed by the Humboldt County Sheriff's Office after a raid on an unpermitted cannabis cultivation and hash lab in the personnel building on January 11, 2019. The case was resolved by July 2019 with no further action required.

Opinion: There was no indication that there was a release of hazardous materials or hazardous waste. This is not considered a REC.

2. **Finding:** The EDR report included a FINDS listing for the Subject Property in 2018.

Opinion: The FINDS listing is probably related to the spill complaint described above and is not considered a REC.

3. **Finding:** The 2013 LACO Phase I ESA included one Historical Environmental Condition and 23 RECs as listed in Section 4.2 of this report. Fifteen of the LACO RECs (1, 2, 3, 4, 5, 6, 7, 8, 17, 18, 19, 20, 21, 22, and 23) are outside of the Subject Property.

Opinion: Listed in the third column below.

REC #	LACO 2013 Phase I ESA Recognized Environmental Condition	Opinion
1	The Underground Storage Tank (UST) Area, located near the chip blower, is classified as a Historical REC (HREC)	This UST case was closed on September 4, 2003 and is no longer a REC and was probably at least 100 feet beyond the Subject Property. The former presence of a leaking underground storage tank is <u>not considered a REC</u> .
2	The hydraulic cylinders near the chip blower	There were no indications that leaking hydraulic oil extended onto the Subject Property. This is <u>not considered a REC</u> .
3	The diesel fuel above ground storage tank (AST)	The diesel AST was located approximately 350 feet northeast of the Subject Property. There were no indications that diesel extended onto the Subject Property. This is <u>not considered a REC</u> .
4	Truck dump #3 hydraulic pump outbuilding	This truck dump is outside of the Subject Property. There were no indications that leaking hydraulic oil extended onto the Subject Property. This is <u>not considered a REC</u> .

REC #	LACO 2013 Phase I ESA Recognized Environmental Condition	Opinion
5	Truck dump #3 hydraulic cylinders and secondary containment	This truck dump is outside of the Subject Property. There were no indications that leaking hydraulic oil extended onto the Subject Property. This is <u>not considered a REC</u> .
6	Truck dump #4 hydraulic cylinders	Truck dump #4 is located approximately 400 feet east of the Subject Property. There were no indications that leaking hydraulic oil extended onto the Subject Property. This is <u>not considered a REC</u> .
7	Truck dump #4 ground surface staining	Truck dump #4 is located approximately 400 feet east of the Subject Property. There were no indications that leaking hydraulic oil extended onto the Subject Property. This is <u>not considered a REC</u> .
8	Backstop fence creosote impregnated posts and planks	The backstop fence is approximately 700 feet east of the Subject Property. This is <u>not considered a REC</u> .
17	Electrical substation A/D	This substation is at least 100 feet beyond the Subject Property. This is <u>not considered a REC</u> .
18	Electrical substation F	This substation is at least 100 feet beyond the Subject Property. This is <u>not considered a REC</u> .
19	Chip blower lube room	The chip blower lube room is at least 100 feet beyond the Subject Property. This is <u>not considered a REC</u> .
20	Chip blower hydraulic pump room	The chip blower hydraulic pump room is at least 100 feet beyond the Subject Property. This is <u>not considered a REC</u> .
21	Chip blower compressor room	The chip blower compressor room is at least 100 feet beyond the Subject Property. This is <u>not considered a REC</u> .
22	Chip blower leach field	This leach field was reportedly east of the chip blower building and likely at least 200 feet beyond the Subject Property. This is <u>not considered a REC</u> .
23	Tractor fueling area	The tractor fueling area and associated AST is approximately 160 feet east of the Subject Property. This is <u>not considered a REC</u> .

4. **Finding:** The 2013 LACO Phase I ESA included five RECs (10, 11, 12, 13, and 14) associated with the chip silo. The chip silo and a 5-foot buffer around it are excluded from this Phase I ESA.

Opinion: Listed in the third column below.

REC #	LACO 2013 Phase I ESA Recognized Environmental Condition	Opinion
10	Chip silo western stoker rooms	No staining was observed around the chip silo during the November 14, 2022 site reconnaissance. The chip silo and a 5-foot buffer around it are excluded from this Phase I ESA. This is <u>not</u> considered a REC.
11	Surface staining of ground adjacent to the western stoker rooms	No staining was observed around the chip silo during the November 14, 2022 site reconnaissance. The chip silo and a 5-foot buffer around it are excluded from this Phase I ESA. This is <u>not</u> considered a REC.
12	Stoker building	No staining was observed around the chip silo during the November 14, 2022 site reconnaissance. The chip silo and a 5-foot buffer around it are excluded from this Phase I ESA. This is <u>not</u> considered a REC.
13	Soil staining on the northern side of the stoker building	No staining was observed around the chip silo during the November 14, 2022 site reconnaissance. The chip silo and a 5-foot buffer around it are excluded from this Phase I ESA. This is <u>not</u> considered a REC.
14	Subterranean room at the chip silo	No staining was observed around the chip silo during the November 14, 2022 site reconnaissance. The chip silo and a 5-foot buffer around it are excluded from this Phase I ESA. This is <u>not</u> considered a REC.

5. **Finding:** The 2013 LACO Phase I ESA included three RECs (9, 16, and 24) inside or relevant to the current Subject Property.

Opinion: Listed in the third column below.

R E C #	LACO 2013 Phase I ESA Recognized Environmental Condition	Opinion
9	Railroad tracks (creosote impregnated ties)	The railroad tracks west of Vance Ave are still in place and there is no evidence of a release. The presence of railroad tracks with creosote is <u>not considered a REC</u> .
15	Transformer south of the main office	There were no indications of leakage from the transformer. This is <u>not considered a REC</u> .
16	Car wash sump	The former car wash was used by employees to rinse their cars after parking near the pulp mill. This is <u>not considered a REC</u> .
24	Historical fill from Humboldt Bay	The eastern developed portion of the Subject Property was built on former dune sands as indicated in boring logs. Imported sand and gravel were likely placed on compacted sands and not on dredge spoils from Humboldt Bay. This is <u>not considered a REC</u> .

6. **Finding:** The 2020 GHD Phase I ESA included three RECs (9, 16, and 24) inside or relevant to the current Subject Property.

Opinion: Listed in the third column below.

R E C #	GHD 2020 Phase I ESA Recognized Environmental Condition	Opinion
1	Potential Hydraulic Oil Releases – Chip Silo Elevator	No staining was observed around the chip silo during the November 14, 2022 site reconnaissance. The chip silo and a 5-foot buffer around it are excluded from this Phase I ESA. This is <u>not considered a REC</u> .
2	Subterranean Room – Chip Silo	No staining was observed around the chip silo during the November 14, 2022 site reconnaissance. The chip silo and a 5-foot buffer around it are excluded from this Phase I ESA. This is <u>not considered a REC</u> .

REC #	GHD 2020 Phase I ESA Recognized Environmental Condition	Opinion
3	Potential Chemical Impacts from Historical Applications	This REC may apply to the south-adjacent property where chemicals were used in the pulp manufacturing process. There was no known chemical applications to the raw wood chips. This is <u>not considered a REC.</u>
4	Likely Migration of Impacts from Adjoining Property (Landfill, Samoa Pulp Mill)	The footprint of landfill Waste Management Unit 3 is approximately 230 feet south of the western portion of the Subject Property. This is <u>not considered a REC.</u>
5	Likely Impacts from Septic System	The septic systems on the Subject Property were connected to restrooms for the offices and the guard shack. This is <u>not considered a REC.</u>
6	Likely Groundwater Migration Impacts from Adjoining Manufacturing Facility (Samoa Pulp Mill)	Most of the historical chemical impacts from the pulp mill operations occurred on the south-adjacent property and have been extensively investigated. There have been at least six boring locations sampled on the Subject Property as shown on Figure 3. The concentration of manganese in the groundwater from four of the borings exceeds the Water Quality Objective established by the State Water Resources Control Board. This is considered a <u>de minimus</u> condition because the Regional Water Board is aware of the reported concentrations and is not requiring additional investigation. This is <u>not considered a REC.</u>

8.0 CONCLUSIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM E1527-21 for the property located at 936 Vance Ave in near south of Samoa, CA. Any exceptions to, or deletions from, this practice are described in Section 9.0 of this report.

This assessment has not revealed the presence of any recognized environmental conditions within the proposed cannabis project area or on the subject property, therefore, per Section 55.4.12.1.11 of the Humboldt County Commercial Cannabis Land Use Ordinance, a Phase II is not necessary.

9.0 DEVIATIONS

There were no deviations from ASTM E1527-21.

10.0 ADDITIONAL SERVICES

No additional services were provided for this Phase I ESA.

11.0 REFERENCES

ASTM, 2021. E1527-21 *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*.

Environmental Data Resources (EDR), *2022 Aerial Photograph Decade Package*.

Environmental Data Resources (EDR), *2022 Certified Sanborn Maps*.

Environmental Data Resources (EDR), *2022 City Directory Report*.

Environmental Data Resources (EDR), *2022 Historic Topographic Maps*.

Environmental Data Resources (EDR), *2022 Radius Map Report*.

GHD, April 30, 2020, *Phase I Environmental Site Assessment Report, Samoa Peninsula Parcels 401-112-030 & 401-031-072, 1 TCF Drive and 936 Vance Avenue Samoa, California*.

LACO, April 24, 2013, *Phase I Environmental Site Assessment Report, Former Louisiana Pacific Pulp, Mill 1 TCF Drive, Samoa, California Assessor's Parcel Numbers 401 -112-017, 401-112-022, & 401-031 -068*.

United States Geological Survey, 2018, *Eureka, CA 7.5 Minute Quadrangle*.