

Limonite Gap Closure Project

Hazardous Materials Technical Study

prepared for Mark Thomas & Company, Inc.

prepared by Rincon Consultants, Inc.

DRAFT - February 10, 2020





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DRAFT – February 10, 2020 Project No.: 18-07054

Josh Cosper, Senior Project Manager Mark Thomas & Company, Inc. – Inland Empire 10630 Town Center Drive, Suite 117 Rancho Cucamonga, California 91730 Via email: jcosper@markthomas.com

Subject: Hazardous Materials Technical Study

Limonite Gap Closure Project

Eastvale, California

Dear Mr. Cosper:

This report presents the findings of a Hazardous Materials Technical Study completed by Rincon Consultants, Inc. for the property identified as the Limonite Gap Closure Project located in Eastvale, California (subject property). This technical study was performed in accordance with our revised proposal dated October 18, 2019 and Subcontract Agreement with Mark Thomas & Company, Inc. dated July 23, 2019. The accompanying report presents our findings and provides an opinion as to the presence of Environmental Conditions with the potential to impact the subject property.

Thank you for selecting Rincon for this project. If you have any questions, or if we can be of any future assistance, please contact us.

Sincerely,

Rincon Consultants, Inc.

Lisa Bestard Senior Environmental Scientist Walt Hamann, PG, CEG, CHG Vice President, Environmental Services

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1 Introduction

It is our understanding that the proposed Limonite Gap Closure Project involves construction of a new segment of Limonite Avenue between Kimball Avenue and the existing Limonite Avenue east of Archibald Avenue and across the Cucamonga Creek Channel (the Channel) in Eastvale, California (subject property, Figures 1 and 2). The proposed project will also include the construction of two bridges across the Channel and improvements to an existing section of Limonite Avenue.

The following sections present our findings and provide our opinion as to the presence of Environmental Conditions with the potential to impact the subject property.

1.1 Purpose

Mark Thomas & Company, Inc. has requested this Hazardous Materials Technical Study (Study) on behalf of the City of Eastvale and will use the information for the purposes of evaluating the subject property for redevelopment. The purpose of this Study is to provide a preliminary evaluation of the potential for environmental effects from hazardous materials and hazardous wastes for the subject property as a result of past or current activities in the area. Our report documents properties of potential environmental concern within the subject property and vicinity, which have or may have been impacted by hazardous materials or wastes and identifies environmental concerns that have the potential to impact the demolition or construction of the subject property.

1.2 Scope of Services

The scope of services conducted during this Study is outlined below:

- Performed a reconnaissance of the subject property to identify obvious indicators of the existence of hazardous materials.
- Observed adjacent or nearby properties from public thoroughfares in an attempt to see if such properties are likely to use, store, generate, or dispose of hazardous materials.
- Obtained and reviewed an environmental records database search to obtain information about the potential for hazardous materials to exist at the subject property or at properties located in the vicinity of the subject property.
- Reviewed online files for the subject property and immediately adjacent properties as identified in the database report, as applicable.
- Reviewed the current United States Geological Survey (USGS) topographic map to obtain information about the subject property and regional topography and uses of the subject property and surrounding sites.
- Reviewed additional pertinent record sources (e.g., California Department of Conservation, California Geologic Energy Management Division records, online databases of hazardous substance release sites), as necessary, to identify the presence of Environmental Conditions at the subject property.
- Reviewed the California State Water Resources Control Board (SWRCB) 2019 statewide per- and poly-fluoroalkyl substances (PFAS) Investigation online Public Map Viewer regarding current PFAS orders at any facilities located in the vicinity of the subject property.

 Reviewed reasonably ascertainable historical resources (e.g., aerial photographs, topographic maps, city directories) to assess the historical land use of the subject property and adjacent properties.

1.3 Significant Assumptions, Limitations, Deviations, Exceptions, Special Terms, and Conditions

This work is intended to adhere to good commercial, customary, and generally accepted environmental investigation practices for similar investigations conducted at this time and in this geographic area. No guarantee or warranties, expressed or implied, are provided. The findings and opinions conveyed in this report are based on findings derived from a site reconnaissance, review of an environmental database report and specified regulatory records and historical sources. This report is not intended as a comprehensive site characterization and should not be construed as such. Standard data sources relied upon during the completion of these types of reports may vary with regard to accuracy and completeness. Although Rincon believes the data sources are reasonably reliable, Rincon cannot and does not guarantee the authenticity or reliability of the data sources it has used. Additionally, pursuant to our contract, the data sources reviewed included only those that are practically reviewable without the need for extraordinary research.

Rincon has not found evidence that hazardous materials or petroleum products exist at the subject property at levels likely to warrant mitigation. Rincon does not under any circumstances warrant or guarantee that not finding evidence of hazardous materials or petroleum products means that hazardous materials or petroleum products do not exist on the subject property. Additional research, including surface or subsurface sampling and analysis, can reduce Client's risks, but no techniques commonly employed can eliminate these risks altogether.

1.4 Project Description

Limonite Avenue is an east-west Urban Arterial that currently ends at Archibald Avenue. In order to improve the service and vehicular capacity of Limonite Avenue and connections between the neighboring City of Chino to the west and Interstate 15 (I-15) to the east, the project would involve an approximately 6,180 feet (1.17 mile) long new segment of Limonite Avenue between Kimball Avenue and the existing Limonite Avenue east of Archibald Avenue across the CCC.

Improvements on Limonite Avenue are divided into three segments, described from west to east:

- 1. Limonite Avenue from Hellman Avenue to the CCC: Approximately 2,450 feet of the existing segment of Limonite Avenue west of the CCC would be improved. From 900 feet east of the intersection with Taylor Way to the existing terminus of Limonite Avenue, improvements include the addition of a Class II bike lane with a transition to a multi-use trail on both sides, including signage and pavement delineation. New road would be constructed from the existing terminus to the CCC, including curb/gutter, raised median, sidewalk improvements, landscaped parkway, and a multi-use trail on both sides, including signage and pavement delineation.
- Cucamonga Creek Channel (CCC) Bridge: This entirely new bridge across the CCC would span approximately 330 feet long by 82 to 88 feet wide, constructed across the CCC to allow continuation of Limonite Avenue. The CCC Bridge would be a 3-span precast concrete girder bridge supported by pier walls at the intermediate supports and located within the CCC. The

- CCC Bridge would include two lanes in each direction and a Class I Bike Lane/Multi-Use Trail with raised median buffer.
- 3. Limonite Avenue east of the CCC Bridge to Archibald Avenue: This segment would be constructed in conjunction with the proposed Homestead industrial development, including a multi-lane roundabout, curb and gutter, two thru lanes in each direction, a raised median, multi-use trails and/or Class II bike lanes on both sides. Improvement widths throughout this section would vary between 108 and 124 feet. Roadway improvements at the intersection would include the construction of new curb ramps, installation and/or modification of the traffic signal, signing, pavement delineation, and street lights. A roundabout or alternative intersection control along Limonite Avenue is being considered for a primary access to the proposed Homestead development (approximately 1,500 feet east of the CCC) (Eastvale 2020). Limonite Avenue would be widened just west of the intersection to conform to lane configuration. The west leg of Limonite Avenue would introduce single left and right turn lanes for east-bound traffic. Roadway improvements at the intersection would include the construction of new curb ramps, installation and/or modification of the traffic signal, signing, pavement delineation, street lights, and relocation of conflicting overhead electrical, telecommunications, and cable television utilities. Improvement widths at the intersection would vary between 102 and 310 feet.

Construction in this area would also include the demolition/removals of multiple steel overhang feeding structures and a single-family residential building located on the existing dairy property just west of Archibald Avenue that is in conflict with the proposed roadway alignment. All removals would include the abatement of hazardous materials such as lead and asbestos containing materials per State and Federal rules and regulations. Additionally, multiple utility facilities may require relocation, including, but not limited to, a high-pressure gas facility located at the dairy and overhead electrical distribution/transmission facilities located act the proposed Limonite Avenue / Archibald Avenue intersection. The City would coordinate directly with the owners of the utility facilities in conflict for them to relocate their facilities prior to construction of the proposed roadway improvements.

Additional improvements include:

- A new 180-foot long bicycle/pedestrian bridge would be constructed across the CCC approximately 1,000 feet south of the proposed CCC Bridge. This bridge would close the gap of an existing multi-use trail located within the Southern California Edison (SCE) easement/ transmission line area north of the Symphony at the Trails residential development. The proposed steel prefabricated bridge would vary between 12 to 16 feet wide to accommodate two-way multi-use travel.
- New catch basins and inlet structures would be constructed as necessary within the roadway limits with storm drain laterals to convey upstream and project-generated drainage.
- Domestic/reclaimed water and sewer mainline facilities would be installed connecting existing
 Jurupa Community Services District facilities located along the existing section of Limonite
 Avenue west of the CCC to facilities located at the Archibald Avenue/Limonite Avenue
 intersection.
- Landscape planting and hardscapes improvements would be installed in parkway areas adjacent to existing and proposed meandering sidewalk/Class II bike facilities/multi-use trails and in the raised medians.

Street lighting would be installed along the corridor on both sides of Limonite Avenue.

Project construction would occur over approximately 12 months, with construction anticipated to begin in January 2022 and be completed in January 2023. Construction would involve grading and excavation for roadway improvements, bridge construction, paving activities, and architectural coating and pavement striping. It is anticipated that export/hauling operations may exceed 50,000 cubic yards of excess soils. Additionally, it is anticipated the project would require import materials that may exceed 50,000 cubic yards depending on final grading elevations.

1.5 Site Description

Location

The subject property encompasses the proposed project described above, and portions of the Channel extending approximately 350 feet north and approximately 1,000 feet south (Figures 2 and 3).

The subject property is located within Riverside County. Figure 1 shows the location of the subject property in the region. Figures 2 and 3 show the subject property in its neighborhood context.

Subject Property and Vicinity General Characteristics

The northern portion of the subject property includes a portion of the Channel extending from approximately Limonite Avenue to just south of Remington Avenue and South Archibald Avenue between Remington Avenue and Limonite Street. The western portion of the subject property is generally located along Limonite Avenue alignment between Hellman Avenue and the Channel and extends northeasterly across developed property (nursery and wood products facility) and the Channel. The eastern portion of the subject property extends northeast from the Channel across developed property (commercial/industrial warehouses and a dairy) to Limonite Avenue just east of South Archibald Avenue. The southern portion of the subject property includes a portion of the Channel south of Limonite Avenue to 65th Street and South Archibald Avenue just south of Limonite Avenue.

Surrounding land uses consist of commercial/industrial warehouse buildings, dairies, single-family residences, and residential and commercial properties under construction. No schools are currently located within one-half mile of the subject property.

2 Records Review

2.1 Physical Setting Sources

Topography

According to the current USGS topographic map for the Corona North Quadrangle (2018), the subject property is situated at elevations ranging from approximately 610 to 650 feet above mean sea level and gently slopes down to the south. The local topography also gently slopes down to the south.

Geology and Hydrogeology

According to the California Geological Survey (CGS), *California Geomorphic Provinces*, *Note 36*¹, the subject property is located within the Peninsular Ranges Geomorphic Province. The Peninsular Ranges are a series of ranges separated by northwest-trending valleys, subparallel to faults branching from the San Andreas Fault. The trend of topography is similar to the Coast Ranges, but the geology is more similar to the Sierra Nevada, with granitic rock intruding the older metamorphic rocks. The Peninsular Ranges extend into lower California and are bounded on the east by the Colorado Desert. The Los Angeles Basin and the island group (Santa Catalina, Santa Barbara, and the distinctly terraced San Clemente and San Nicolas islands), together with the surrounding continental shelf (cut by deep submarine fault troughs), are included in this province.

Site Geology

According to the USGS Geologic Map of the San Bernardino and Santa Ana Quadrangles (2006), the subject property is underlain by Quaternary-age alluvial gravel, sand, and silt of valleys and floodplains (Qa).

Regional Groundwater Occurrence and Quality

The subject property is located within the Upper Santa Ana Valley groundwater basin and Chino subbasin.

During the preparation of this Study, we reviewed the SWRCB's online GeoTracker database to determine groundwater flow direction in the vicinity of the subject property. According to *Case Closure Summary, Vander Meer Dairy Farm, 6851 Harrison Avenue, Corona, California* dated January 23, 2003, groundwater was reported to range from approximately 30 to 33 feet below ground surface and was assumed to flow toward the southwest. This property is located approximately 0.4 mile to the east of the subject property.

2.2 Standard Environmental Record Sources

Environmental Data Resources, Inc. (EDR) was contracted to provide a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred. The EDR search was conducted for the subject property and included data

¹ https://www.conservation.ca.gov/cgs/Documents/Publications/Note_36.pdf

from surrounding sites within specified radii of the property. A copy of the EDR report is included as Appendix A. As shown on the attached EDR report, federal, state, and county lists were reviewed as part of the research effort. Please refer to Appendix A for a complete listing of sites reported by EDR and a description of the databases reviewed.

The Map Findings Summary, included in the EDR report, provides a summary of the databases searched, the number of reported facilities within the search radii, and whether the facility is located on or adjacent to the subject property. The following information is based on our review of the Map Findings Summary and the information contained in the EDR report.

Subject Property

The subject property was listed on the following databases (as defined in Appendix A page 23):

- DYT Dairy #1/ Andy DYT 6205 and 6207 Archibald Avenue: FINDS, ECHO, WDS, CERS, and CIWQS
- Geotechnical Borings for the Merrill Avenue Bridge/ Merrill Bridge and Storm Drain Merrill
 Bridge and Cucamonga Channel: CERS, NPDES, and CIWQS
- Redwood Products of Chino, Inc. 9301 Remington Avenue: SWF/LF, CERS, CERS HAZ WASTE, CERS TANKS, AST, RCRA NonGen/NLR, and HAZNET
- Sidney De Boer Dairy 8865 Kimball Avenue: ENF, San Bernardino County Permit, CIWQS, and CERS

Regulatory agency files reviewed for the subject property are discussed in the Additional Environmental Record Sources section of this report.

Offsite Properties

Offsite properties listed by EDR fall under two general categories of databases: those reporting unauthorized releases of hazardous substances (e.g., Leaking Underground Storage Tank [LUST], National Priority List [a.k.a. Superfund sites], and corrective action facilities), and databases of businesses permitted to use hazardous materials or generate hazardous wastes, for which an unauthorized release has not been reported to a regulatory agency.

Rincon reviewed the EDR Radius Map and select detailed listings to evaluate their potential to impact the subject property, based on the following factors:

- Reported distance of the facility from the subject property
- The nature of the database on which the facility is listed, and/or whether the facility was listed on a database reporting unauthorized releases of hazardous materials, petroleum products, or hazardous wastes
- Reported case type (e.g., soil only, failed underground storage tank [UST] test only)
- Reported substance released (e.g., chlorinated solvents, gasoline, metals)
- Reported regulatory agency status (e.g., case closed, "no further action")
- Location of the facility with respect to the reported groundwater flow direction (discussed in the Geology and Hydrogeology section of this report)

Facilities/properties that were interpreted by Rincon to be of potential environmental concern to the subject property, based on one or more of the factors listed above, are summarized in Table 1.

Contamination migration pathways in soil, groundwater, and soil vapor were considered in our analysis of offsite properties of potential environmental concern.

Orphan Listings

EDR reported 16 orphan or unmapped site listings, which EDR is unable to plot due to insufficient address information. Based on Rincon's review of the limited address information, these listings are not expected to impact the subject property.

Table 1 EDR Listing Summary of the Subject Property and Select Sites on and within One-Eighth Mile of the Subject Property

Site Name	EDR Site ID	Site Address	Distance from Subject Property	Database Reference	Comments
Subject Property					
DYT Dairy #1/ Andy DTY	A1-A5, A9 6205 and 6 Archibald Avenue		207 Subject Property	FINDS, ECHO	The facility is categorized as a concentrated animal feedin operation (dairy farm) that is enrolled in a surface water discharge program. No violations were identified during enforcement compliance inspections from 2016 to 2019.
				WDS	The facility is classified as agricultural, which treats and/or disposes of wastes associated with confined and concentrated animal feeding, holding, aquatic animal production facilities, and aquaculture. The facility status is active, which indicates that it has a continuous or seasona discharge under the Regional Water Quality Control Board's (RWQCB) Waste Discharge Requirements. Waste types generated are listed as "designated/ influent or solic wastes" and "stormwater runoff." The facility is categorized as having no waste treatment systems and a moderate threat to water quality because of the high concentrations of wastes discharged.
				CERS	The facility is classified as a generator of animal wastewater discharge and previous compliance evaluation inspections from 2001 to 2019 did not identify violations, with the exception of 2011 and 2013. No additional information was provided in regard to the violations.
				CIWQS	The facility's permit for industrial stormwater discharge was terminated in 2000.
Redwood Products of Chino, Inc.	11, C12-C14 9301 Remington Avenue	Remington	Subject Property	SWF/LF	The facility is classified as a "chipping and grinding" and "composting" operation that accepts green materials and wood waste. The facility has an active permit as of 2015 to contain 22,100 tons of material.
				CERS, CERS HAZ WASTE, CERS TANKS	The facility is classified as a solid waste and recycle site, a hazardous waste generator, an aboveground petroleum storage site, and a chemical storage facility. Multiple previous violations were incurred during a 2014 compliance evaluation inspection pertaining to containment/diversionary structures and equipment,

Site Name	EDR Site ID	Site Address	Distance from Subject Property	Database Reference	Comments
					business administrative documentation, a site map, a Spill Prevention, Control, and Countermeasure (SPCC) plan, training, inventory information submittal, inspections and tests, an emergency response plan, and other operations and maintenance procedures. The facility subsequently returned to compliance in regard to all reported violations, and no violations were found during inspections in 2015 and 2017.
				AST	The facility has an aboveground storage tank (AST) of unreported capacity and contents.
				RCRA NonGen/NLR	The facility does not currently generate hazardous waste and no violations are reported.
				HAZNET	The facility generated asbestos-containing waste in 2007 and various quantities of "other organic solids" waste from 2015 to 2017.
Sidney De Boer Dairy	15	8865 Kimball Avenue	Subject Property	ENF	The facility is classified as an agricultural "growing" and "confined animal feeding" (dairy farm) site that was historically enrolled in a stormwater/wastewater discharge program for animal (cow) waste and stormwater runoff.
				San Bernardino County Permit	The inactive facility was an agricultural hazardous materials handler with an expired permit as of 1991.
				CIWQS	The facility held a historical National Pollutant Discharge Elimination Program (NPDES) permit for animal (cow) waste discharge that expired in 1997.
				CERS	The facility is classified as an "animal wastewater discharge" site with two previous violations (regarding manure in the Hellman Avenue right-of-way) incurred during compliance evaluation inspections in 2001 and 2003.

2.3 Additional Environmental Record Sources

Cortese Listings

According to the Department of Toxic Substances Control (DTSC) EnviroStor online database and the California Environmental Protection Agency (CalEPA) Hazardous Waste and Substance sites "Cortese" list, there are no Federal Superfund sites located within one-half mile of the subject property.

Review of Agency Files

As a follow-up to the database search, Rincon reviewed regulatory information for facilities within the specified search radii that were interpreted to have the potential to impact the subject property, based on one or more factors previously discussed (e.g., distance, open case status, upgradient location, soil vapor migration).

The following is a summary of our review of regulatory information obtained from review of online sources (e.g., SWRCB GeoTracker database, DTSC EnviroStor database, local fire department). No inperson regulatory file reviews were conducted.

Subject Property

The subject property was listed in multiple databases searched by EDR as the following businesses: DYT Dairy #1, Redwood Products of Chino, Inc., and Sidney De Boer Dairy. These listings are not indicative of hazardous materials releases.

Additionally, the EDR report maps depict a power transmission line traversing the southern portion of the subject property in a northeast-southwest direction.

Adjacent Properties

No adjacent properties were listed in databases searched by EDR.

Nearby Release Sites

None of the nearby or upgradient listed sites within one-eighth mile of the subject property are release sites.

2.4 Review of State of California Geologic Energy Management Division Records

A review of the Department of Conservation, California Geologic Energy Management Division (CalGEM) online database² indicates that there are no oil/gas fields or production wells located on or within one-quarter mile of the subject property.

² https://maps.conservation.ca.gov/doggr/wellfinder/

2.5 Review of National Pipeline Mapping System Records

A review of the National Pipeline Mapping System (NPMS) online Public Map Viewer³ indicates that there are no hazardous material (liquid) pipelines located on or adjacent to the subject property. However, two active (filled) natural gas pipelines traverse the eastern portion of the subject property in the areas of the dairy and the intersection of South Archibald Avenue and Limonite Avenue.

During the January 14, 2020 site reconnaissance, natural gas pipeline markers were observed on the eastern portion of the subject property along Limonite Avenue and South Archibald Avenue. During the January 30, 2020 site reconnaissance, natural gas pipeline markers were observed near the southern boundary of the west-southwest/east-northeast oriented channel located along the Riverside/San Bernardino County line, on the dairy property located at 6205-6207 Archibald Avenue.

2.6 Review of California Statewide PFAS Investigation

In 2019, the SWRCB sent assessment requirements to property owners of sites that may be potential sources of PFAS. These sites currently include select landfills, airports, and chrome plating facilities. According to the SWRCB, "PFAS are a large group of human-made substances that do not occur naturally in the environment and are resistant to heat, water, and oil." (SWRCB, 2019).

Our November 20, 2019 review of the California 2019 Statewide PFAS Investigation online Public Map Viewer⁴ indicates that there are no current chrome plating, airport, or landfill PFAS orders at any facilities located within one-half mile of the subject property.

2.7 Known or Suspect Contaminated Release Sites with Potential Vapor Migration

The EDR report was reviewed to identify nearby known or suspect contaminated sites that have the potential for contaminated vapor originating from the nearby site to be migrating beneath the subject property. Based on the ASTM E2600-15, Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions, the following minimum search distances were initially used to determine if contaminated soil vapors from a nearby known or suspect contaminated site have the potential to be migrating beneath the subject property:

- 1/10 mile (528 feet) for petroleum hydrocarbons
- 1/3 mile (1,760 feet) for other contaminants of concern (COCs)

If known or suspect contaminated sites are located within the above referenced distances from the subject property, online resources are reviewed to determine the extent of the contaminated plume at those sites. The following describes search distances for contaminated plumes of petroleum hydrocarbons (30 feet from the subject property) and other Contaminants of Concern (COCs) (100 feet from the subject property). Per ASTM E2600-15, vapors associated with impacted soil or

³ https://www.npms.phmsa.dot.gov/PublicViewer/

⁴ https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=4feba1766c224dc99eadea06ef3bd019

groundwater present within these distances have the potential to migrate beneath the subject property.

Petroleum Hydrocarbons

Based on our review of the EDR report, no releases have been reported in association with facilities located on the subject property or adjacent properties. However, the subject property traverses the Redwood Products of Chino, Inc. facility, which is associated with a petroleum AST of unreported capacity. During the site reconnaissance, one approximately 10,000-gallon AST was observed on the Redwood Products of Chino, Inc. site, located over 250 feet north of the subject property.

Based on the nature of the listing (not indicative of a release) and distance from the subject property, this suspect release site does not have the potential to have petroleum hydrocarbonimpacted soil or groundwater plumes located within 30 feet of the subject property.

Other COCs

Based on our review of the EDR report, there are no known sites contaminated with other COCs within 1,760 feet of the subject property. However, the subject property traverses the DYT Dairy #1 facility, which is an active dairy. Dairies are associated with manure in soil, which produces methane gas. Therefore, there is a potential for methane-impacted soil vapor to be located at the subject property.

2.8 Historical Use Information on the Property and the Adjoining Properties

The historical records reviewed for this Study include aerial photographs, topographic maps, and city directories as detailed in the following sections. Copies of the historical resources reviewed are included in Appendix B.

Review of Aerial Photographs

Aerial photographs from EDR's aerial photograph collection were obtained. In addition, a current aerial from Google Earth was reviewed. The aerial photographs were reviewed in January 2020.

Review of Historical Topographic Maps

Historical topographic maps from EDR's map collection were obtained. The historical topographic maps were reviewed in January 2020.

Review of City Directory Listings

EDR was contracted to provide copies of city directory listings for the subject property. The city directory listings were reviewed in January 2020.

Review of Fire Insurance Maps

EDR was contracted to provide copies of fire insurance maps (Sanborns) for the subject property. As indicated in the attached report, fire insurance maps were not available for the subject property or adjacent properties.

Review of City of Eastvale Building Permit Records

Building permit records for the subject property were searched on the City of Eastvale's website; however, no building permit records are available online. Records may be available in person, but in-person record reviews were not performed as part of this Study.

In addition, building permit records for the subject property were searched on the City of Chino's website; however, no building permit records are available online. Records may be available in person, but in-person record reviews were not performed as part of this Study.

Other Historical Sources

Based on the historical information obtained, no additional historical sources were reviewed.

Summary of Historical Uses

Subject Property (6205-6207 Archibald Avenue and 9301 Remington Avenue)

Based on our review of the documents listed above, it appears that the subject property was developed with the following:

- 1902 topographic map (TM): Undeveloped, with paved roads traversing the subject property
- 1938 aerial photograph (AP): The majority of the subject property is undeveloped land or agriculture (dry farming); the eastern portion of the subject property is developed with portions of two orchards and at least one residential/agricultural building.
- 1942 TM: Two buildings and paved roads (Archibald Avenue and Limonite Avenue) traversing the eastern portion of the subject property
- 1947 TM: Four buildings, unpaved roads, and paved roads (Archibald Avenue and Limonite Avenue in the east) traversing the northern and eastern portions of the subject property
- 1948 AP: The central portion of the subject property appears to be Cucamonga Creek (unpaved). Livestock pens appear to be located on the central-western portion of the subject property. The remainder of the subject property is undeveloped land or agriculture (dry farming), with the exception of the easternmost portion of the subject property, which is developed with portions of two orchards and at least two residential/agricultural buildings.
- 1953 AP: Similar to the 1948 AP. The easternmost portion of the subject property is developed with several residential/agricultural buildings; the two orchards have been cleared and are vacant land or used for dry farming.
- 1967, 1973, and 1981 TMs: Cucamonga Creek traverses the central portion of the subject property in a north-south direction. Five buildings are located on the eastern portion of the subject property. Paved roads (Archibald Avenue and Limonite Avenue) traverse the central and eastern portions of the subject property. Power transmission lines traverse the southern portion of the subject property in a northeast-southwest direction.
- 1967 AP: Similar to the 1953 AP. The easternmost portion of the subject property is developed with at least three residential and two agricultural buildings.
- 1975 AP: Similar to the 1967 AP. The livestock pens on the central-western portion of the subject property appear to be inactive.
- 1985 AP: Cucamonga Creek has been channelized. The livestock pens on the central-western
 portion of the subject property have been cleared and are vacant land or used for dry farming.
 The majority of buildings on the easternmost portion of the subject property appear to have

been cleared; two existing livestock shelters have been constructed (a portion of the existing dairy).

- 1989 AP: Similar to the 1985 AP. The central-western portion of the subject property appears to be used for agriculture (dry farming or row crops) and as a portion of a storage yard with piles of soil or other material. The easternmost portion of the subject property is developed with four existing livestock shelters (a portion of the existing dairy) and the existing single-family residence.
- 1994 AP: The central-western portion of the subject property appears to be used for agriculture (a nursery, dry farming, or row crops) and as a portion of the existing storage yard with piles of material. The westernmost portion of the subject property has been developed with a portion of a dairy (two livestock shelters).
- 2002 Google Earth image: Similar to the 1994 AP. The existing dairy on the easternmost portion
 of the subject property has been expanded westward, with the addition of one existing livestock
 shelter.
- 2006 AP: Similar to the 2002 Google Earth image. One dairy pond is located on the western and central-eastern portions of the subject property. A disturbed area appears to be located on the eastern portion of the subject property, between the central-eastern dairy pond and the existing eastern dairy.
- 2009 AP: Similar to the 2006 AP. The western dairy pond appears to no longer be present.
- 2012 AP. Similar to the 2009 AP. The eastern dairy pond appears to have decreased in size.
- 2016 AP: Similar to the 2012 AP. The western dairy has been cleared and is vacant land. The existing dairy remains on the eastern portion of the subject property. The eastern dairy pond appears to no longer be present.
- 2018 Google Earth image: The western portion of the subject property has been paved (Limonite Avenue). The existing storage yard and nursery remain on the central-western portion of the subject property. The existing dairy remains on the eastern portion of the subject property.

City directories indicate that the subject property was occupied by the following:

9301 Remington Avenue: Redwood Products Chino Inc. in 2005, 2010, and 2014

Northeastern Adjacent Properties (6205-6207 Archibald Avenue)

Based on our review of the documents listed above, it appears that the northeastern adjacent properties between the Channel and Archibald Avenue were developed with the following:

- 1902 TM: Undeveloped
- 1938 AP: The majority of the northeastern adjacent properties are undeveloped land or used for agriculture (dry farming). An orchard, the existing residential building, and at least three former agricultural buildings are located on the properties north of the easternmost portion of the subject property.
- 1942 TM: Two buildings
- 1947 TM: Three buildings and unpaved roads
- 1948 AP: Similar to the 1938 AP.
- 1953 AP: Similar to the 1948 AP. The orchard formerly located north of the easternmost portion of the subject property has been cleared and is vacant land.

- 1967 TM: Two buildings and a paved road (Remington Avenue)
- 1967 AP: Similar to the 1953 AP. Four former agricultural buildings and livestock pens are located on the properties north of the easternmost portion of the subject property.
- 1973 TM: Six buildings and a paved road (Remington Avenue)
- 1975 AP: Similar to the 1967 AP.
- 1985 AP: Similar to the 1975 AP. All structures but the existing residential building and one former agricultural building have been cleared from the properties north of the easternmost portion of the subject property.
- 1989 AP: Similar to the 1985 AP. The former agricultural building has been cleared from the properties north of the easternmost portion of the subject property; two existing livestock shelters have been constructed in this area.
- 1994 AP: Similar to the 1989 AP. One former agricultural building and one additional livestock shelter have been constructed on the properties north of the easternmost portion of the subject property.
- 2002 Google Earth image: Similar to the 1994 AP. Two existing agricultural buildings and one additional livestock shelter have been constructed on the properties north of the easternmost portion of the subject property.
- 2006 AP: Similar to the 2002 Google Earth image. A former dairy pond is located north of the central-eastern portion of the subject property.
- 2009 AP: Similar to the 2006 AP.
- 2012 AP: Similar to the 2009 AP. The former dairy pond located north of the central-eastern portion of the subject property appears to have decreased in size.
- 2016 AP: Similar to the 2016 AP. The former dairy pond located north of the central-eastern portion of the subject property is no longer present.
- 2018 Google Earth image: Similar to the 2016 AP.

City directories were not provided for the northeastern adjacent properties.

Southeastern Adjacent Properties (6205-6207 Archibald Avenue and 6300 Providence Way)

Based on our review of the documents listed above, it appears that the southeastern adjacent properties between the eastern and southern portions of the subject property were developed with the following:

- 1902 TM: Undeveloped, with paved roads
- 1938 AP: The majority of the southeastern adjacent properties are undeveloped land or used for agriculture (dry farming). An orchard is located on the properties south of the easternmost portion of the subject property.
- 1942 TM: Undeveloped
- 1948 AP: Similar to the 1938 AP.
- 1947 TM: Unpaved roads
- 1953 AP: Similar to the 1948 AP. The orchard located on the properties south of the easternmost portion of the subject property has been cleared and is vacant or used for agriculture (dry farming).

- 1967 and 1973 TMs: One water well and power transmission lines
- 1967 and 1975 APs: Similar to the 1953 AP.
- 1985 AP: The majority of the southeastern adjacent properties are undeveloped land or used for agriculture (dry farming). A dairy is located to the south of the eastern portion of the subject property.
- 1989 and 1994 APs: Similar to the 1985 AP.
- 2002 Google Earth image: Similar to the 1994 AP.
- 2006 AP: The northern portion of the southeastern adjacent properties are undeveloped land or used for agriculture (dry farming). The existing dairy located to the south of the eastern portion of the subject property remains.
- 2009 AP: The northern portion of the southeastern adjacent properties are undeveloped land or used for agriculture (dry farming). The existing dairy located to the south of the eastern portion of the subject property remains.
- 2012 AP: Similar to the 2009 AP.
- 2016 AP: Similar to the 2012 AP. An area of formerly undeveloped or agricultural (dry farming)
 land located east of the southern portion of the subject property has been redeveloped with the
 existing single-family residences and a power transmission line easement in their current
 configuration.
- 2018 Google Earth image: Similar to the 2016 AP. The area south of the existing dairy and north
 of the power transmission line easement has been developed with the existing commercial/light
 industrial warehouses in their current configuration.

City directories were not provided for the southeastern adjacent properties.

Southwestern Adjacent Properties (9301 Remington Avenue)

Based on our review of the documents listed above, it appears that the southwestern adjacent properties between the southern and western portions of the subject property were developed with the following:

- 1902 TM: Undeveloped, with paved roads
- 1938 AP: The southwestern adjacent properties are undeveloped land or used for agriculture (dry farming).
- 1942 and 1947 TMs: Undeveloped land
- 1948 AP: Similar to the 1938 AP.
- 1953 AP: Similar to the 1948 AP. One residential or agricultural building is located to the south
 of the western portion of the subject property.
- 1967 TM: One building, an unpaved road, and power transmission lines
- 1967 AP: Similar to the 1953 AP. One agricultural building is located adjacent to the west of the southern portion of the subject property.
- 1973 TM: Five buildings, an unpaved road, and power transmission lines
- 1975 AP: Similar to the 1967 AP. The agricultural building formerly located adjacent to the west of the southern portion of the subject property has been replaced with a smaller agricultural building located farther west.
- 1981 TM: Two buildings, an unpaved road, and power transmission lines

- 1985 AP: Similar to the 1975 AP. The agricultural building formerly located west of the southern portion of the subject property has been cleared.
- 1989 AP: Similar to the 1985 AP.
- 1994 AP: Similar to the 1989 AP.
- 2002 Google Earth image: Similar to the 1994 AP.
- 2006 AP: Similar to the 2002 Google Earth image. The area to the south of the western portion
 of the subject property is undeveloped land or used for agriculture (dry farming or a nursery).
- 2009 AP: Similar to the 2006 AP. A parking lot and park have been constructed to the south of the western portion of the subject property. Existing single-family residences are under construction to the southwest of the southern portion of the subject property.
- 2012 and 2016 APs and 2018 Google Earth image: Similar to the 2009 AP.

City directories were not provided for the southwestern adjacent properties.

Northwestern Adjacent Properties (9301 Remington Avenue and 14910-14970 Summit Drive)

Based on our review of the documents listed above, it appears that the northwestern adjacent properties between the western and northern portions of the subject property were developed with the following:

- 1902 TM: Undeveloped, with paved roads
- 1938 AP: The majority of the northwestern adjacent properties are undeveloped land or used for agriculture (dry farming). An area located adjacent to the west of the central-northern portion of the subject property is developed with multiple residential and agricultural buildings.
- 1942 TM: One building
- 1947 TM: One building and unpaved roads
- 1948 AP: Similar to the 1938 AP. The residential/agricultural area located adjacent to the west of the central-northern portion of the subject property has expanded to the west and includes livestock pens to the south.
- 1953 AP: Similar to the 1948 AP.
- 1967, 1973, and 1981 TMs: Three buildings and a paved road (Remington Avenue)
- 1967 AP: Similar to the 1953 AP.
- 1975 AP: Similar to the 1967 AP. A dairy has been constructed to the north of the westernmost portion of the subject property.
- 1985 AP: Similar to the 1975 AP. The livestock pens located adjacent to the west of the centralnorthern portion of the subject property have been removed and the area is vacant land or used for dry farming.
- 1989 AP: Similar to the 1985 AP. The residential/agricultural area located adjacent to the west of the central-northern portion of the subject property appears to have stockpiles of material.
- 1994 AP: Similar to the 1989 AP. The dairy located to the north of the western portion of the subject property has been expanded to the south (onto the subject property). Additional stockpiles of material are located on the residential/agricultural area located adjacent to the west of the central-northern portion of the subject property.

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- 2002 Google Earth image: Similar to the 1994 AP. At least three additional commercial buildings have been constructed on the residential/agricultural area located adjacent to the west of the central-northern portion of the subject property.
- 2006 AP: Similar to the 2002 Google Earth image. A nursery is located adjacent to the west of the central-northern portion of the subject property (on the northern end of the residential/agricultural property).
- 2009 AP: Similar to the 2006 AP.
- 2012 AP: Similar to the 2009 AP.
- 2016 AP: Similar to the 2012 AP. The dairy located adjacent to the north of the western portion of the subject property has been cleared and is vacant land. The majority of structures associated with the dairy located to the west of the northern portion of the subject property have been cleared.
- 2018 Google Earth image: Similar to the 2016 AP. Existing commercial/light industrial
 warehouses and paved roads have been constructed to the north of the western portion of the
 subject property in their current configuration.

City directories indicate that the northwestern adjacent properties were occupied by the following:

9301 Remington Avenue: Redwood Products Chino Inc. in 2005, 2010, and 2014

Gaps in Historical Sources

Several gaps of greater than five years were identified in the historical records reviewed, from 1902 to 1938, 1953 to 1967, 1967 to 1973, 1975 to 1981, and 1994 to 2002. These gaps are considered insignificant because the subject property use appears to be similar prior to and following the gaps.

3 Interviews

Rincon performed interviews regarding the subject property and surrounding areas. The purpose of the interviews was to discuss current and historical conditions and to obtain information indicating the presence of Environmental Conditions in connection with the subject property.

3.1 Interview with Site Manager

During the January 30, 2020 site reconnaissance, Rincon interviewed Peter Haringsma, the site manager for the 6205-6207 Archibald Avenue property, which is occupied by Dyt Dairy. Mr. Haringsma indicated that the ponds observed on the dairy property are formed from the collection of rainwater and runoff from washing cattle. He also indicated that the stockpiled soil observed on the dairy property is placed in the cattle pens.

3.2 Interviews with Others

Rincon did not attempt to interview neighboring property owners or others as part of this Study.

4 Site Reconnaissance

Rincon performed a reconnaissance of the subject property on January 14, 2020 accompanied by Scott Heaviside, Development Manager with Transwestern Development Company. Rincon performed a second reconnaissance of the subject property on January 30, 2020 accompanied by Peter Haringsma, site manager of the Dyt Dairy (6205-6207 Archibald Avenue). The purpose of the reconnaissances was to observe existing subject property conditions and to obtain information indicating the presence of Environmental Conditions in connection with the subject property.

4.1 Methodology and Limiting Conditions

The site reconnaissances were conducted by:

- 1. Observing the subject property from public thoroughfares,
- 2. Observing the adjacent properties from public thoroughfares,
- 3. Observing the exterior of the onsite structures, and
- 4. Observing the subject property from driveways, paved and unpaved roads, sidewalks, and walking paths.

4.2 Current Use of the Property and Adjacent Properties

The subject property is currently developed with the Channel, a portion of a nursery/wood products facility, a portion of a dairy, and paved roads. Adjacent properties include single-family residences, a nursery and wood products facility, a dairy, commercial/light industrial warehouses, residential and commercial land under construction, recreational land, and high-voltage power lines.

4.3 Past Use of the Property and Adjacent Properties

Based on our site reconnaissance, past uses at the subject property and adjacent properties are not readily apparent.

4.4 Current or Past Uses in the Surrounding Areas

The subject property is surrounded by residential, commercial/light industrial, agricultural, and recreational land uses and vacant land as detailed in the Site Description section of this report. Past uses of the surrounding area are not readily apparent based on the site reconnaissance.

4.5 Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions

Geologic, hydrogeologic, hydrologic, and topographic information are as previously stated in the Physical Settings Section of this report.

4.6 General Description of Structures

The subject property is developed with portions of Limonite Avenue, South Archibald Avenue, the Channel, a dairy, and a nursery and wood products facility. No permanent structures are located on the portion of the subject property that traverses the nursery/wood products facility. Five cattle shelters, one covered storage area, and one single-family residence are located on the portion of the subject property that traverses the dairy.

4.7 Roads

The western portion of the subject property is generally located along Limonite Avenue alignment between Hellman Avenue and the Channel. The eastern portion of the subject property extends to Limonite Avenue just east of South Archibald Avenue.

4.8 Potable Water Supply

The nursery/wood products facility and the dairy, which the subject property traverses, are currently supplied with potable water by Jurupa Community Services District.

4.9 Sewage Disposal System

The nursery/wood products facility and the dairy, which the subject property traverses, are currently connected to the City of Eastvale (or Jurupa Community Services District) sewer system.

4.10 Exterior Observations

Hazardous Substances and Petroleum Products in Connection with Identified Uses

Hazardous substances and petroleum products observed at the subject property are as follows:

Three four-liter containers of motor oil were observed in the covered storage area on the dairy.

Storage Tanks

During the site reconnaissance, the following storage tanks were observed on the subject property:

- One approximately 2,000-gallon water pressure tank, associated with a water well, was observed to the south of the covered storage area on the dairy.
- Two diesel and one gasoline aboveground storage tank (AST), approximately 500 to 750 gallons in size, were observed in the covered storage area on the dairy. The ASTs did not appear to be in use; however, stained soil was observed beneath two of the ASTs.
- One approximately 750-gallon gasoline AST and one approximately 2,000-gallon unlabeled AST were observed on the southern side of the northern commodity barn on the dairy. The ASTs did not appear to be in use. No indications of release were observed in the vicinity of the ASTs.
- Two approximately 2,000-gallon unlabeled ASTs were observed between the northern and southern commodity barns on the dairy. According to Mr. Haringsma, the ASTs appear to be in

use and likely contain molasses used in the production of cattle feed. No indications of release were observed in the vicinity of the ASTs.

No other above- or below-ground storage tanks or evidence of USTs were observed on the subject property.

Odors

During the site reconnaissance, Rincon identified an odor of manure from the onsite/adjacent dairy.

Pools of Liquid

During the site reconnaissance, one dairy pond was observed to the northeast of the northern commodity barn on the dairy. In addition, two ponds formed from the collection of rainwater and runoff from washing cattle were observed on the western portion of the dairy.

Drums

During the site reconnaissance, one plastic 55-gallon industrial drum was observed in the covered storage area on the dairy. The drum appeared to be empty. No indications of release were observed in the vicinity of the drum.

Hazardous Substances and Petroleum Products Containers Not in Connection with Identified Uses

Hazardous substances or petroleum products not in connection with identified uses were not observed at the subject property.

Unidentified Substance Containers

The following unidentified substance containers were observed on the subject property:

- Two open, five-gallon buckets containing a dark liquid were observed beneath the three petroleum ASTs in the covered storage area on the dairy. The buckets appeared to serve as drip pans for the ASTs or the dispenser handles.
- Four one-gallon unlabeled containers were observed beneath the three petroleum ASTs in the covered storage area on the dairy. It is unknown if the containers were empty.

Indications of Polychlorinated Biphenyls (PCBs)

During the site reconnaissance, Rincon observed three pole-mounted transformers located near/along South Archibald Avenue on the easternmost portion of the subject property. There was no indication of a release in the vicinity of the transformers.

Other Conditions of Concern

During the site reconnaissance, Rincon did not note any of the following:

- Clarifiers and sumps
- Degreasers/parts washers
- Stressed vegetation
- Septic systems/effluent disposal system

Stained soil. Stained soil was observed beneath the three petroleum ASTs located in the covered storage area on the dairy, likely from the ASTs.

Solid waste/debris. Several piles of landscaping debris and other trash were observed on the portion of the subject property that traverses a nursery/wood products facility.

Stockpiles of material. Multiple stockpiles of soil, mulch, woodchips, and other wood waste were observed on the portion of the subject property that traverses a nursery/wood products facility and appeared to be in connection with the facility's operations. A pile of concrete rubble was observed on the southern side of the southern commodity barn on the dairy. An area of stockpiled soil, observed to the southwest of the commodity barns on the dairy, was reported to be placed in the cattle pens as needed.

Wells. One water well was observed on the southern side of the covered storage area on the dairy.

5 Evaluation

Rincon has performed the Study for the Limonite Avenue Gap Closure Project located in Eastvale, California. Based on the research conducted as part of this assessment, three hazardous material findings that may affect demolition and/or grading/construction of the subject property have been identified and are described below in Table 2. If additional assessment is warranted, the necessary recommendations are identified and described below.

 Table 2
 Summary of Hazardous Material Findings, Opinions, and Recommendations

Environmental Concern/Opinion	Demolition and Grading/ Construction Impacts	Recommendations
According to the historical resources reviewed, a dairy was formerly located on the westernmost portion of the subject property from approximately 1994 to 2012. Based on the former dairy use, there is the potential for methane to be present in the subsurface.	The western portion of the subject property is currently developed with Limonite Avenue. Improvements to this segment of the proposed project (Hellman Avenue to Taylor Way) consist of the addition of bike lanes within the existing pavement. Because the western portion of the subject property is paved and soil disturbance is not planned in the vicinity of the former dairy during the proposed project, no additional assessment is warranted.	None at this time.
According to the historical resources reviewed, the central-western portion of the subject property was used for agricultural purposes (dry farming, row crops, or a nursery) from at least 1989 to present day (existing nursery).	Improvements to the segment of the proposed project from the existing Limonite Avenue terminus to the proposed Channel bridge include construction of a new road and bridge. Because agricultural land use is typically associated with the use of pesticides and arsenic, there is the potential for impacted soil to be encountered during demolition and grading/construction activities. If soil and/or groundwater are impacted, a health risk could exist for site workers during demolition, removal of impacted soil, and grading/construction.	Rincon recommends conducting a soil assessment on the existing nursery property within the footprint of the proposed project.

Environmental Concern/Opinion	Demolition and Grading/ Construction Impacts	Recommendations
According to the historical resources reviewed, the existing dairy on the eastern portion of the subject property has been present since at least 1967, including a dairy pond near the central-eastern portion of the subject property from approximately 2006 to 2012. During the site reconnaissance, the dairy was observed to be active. Based on the land use as a dairy, there is the potential for methane to be present in the subsurface.	Improvements to the segment of the proposed project from the Channel to Archibald Avenue include construction of a new road and bike trails/lanes, and existing roadway/intersection improvements. Although dairies are typically associated with the presence of methane in the subsurface, because improvements to this segment of the proposed project do not include the construction of occupied structures, no additional assessment is warranted.	None at this time.
During the site reconnaissance, four petroleum ASTs were observed on the dairy on the eastern portion of the subject property. It is unknown if any of the ASTs are currently in use; however, stained soil was observed beneath the three ASTs located in the covered storage area.	Improvements to the segment of the proposed project from the Channel to Archibald Avenue include construction of a new road and bike trails/lanes, and existing roadway/intersection improvements. There is the potential for releases to have occurred from the ASTs, and stained soil was observed beneath the three ASTs located in the covered storage area on the dairy. Therefore, there is the potential for impacted soil to be encountered during demolition and grading/construction activities. If soil is impacted, a health risk could exist for site workers during demolition, removal of impacted soil, and grading/construction.	Rincon recommends properly abandoning and removing the ASTs and conducting a soil assessment in the vicinity of the ASTs located in the covered storage area.

6 References

The following materials were used in preparation of this Hazardous Materials Technical Study:

Aerial Photographs

Photos provided by Environmental Data Resources, Inc. (EDR) on January 15, 2020.

City Directory Listings

Listings provided by EDR on January 16, 2020.

Environmental Database

EDR report dated January 14, 2020.

Geology

California Geologic Survey (CGS), *California Geomorphic Provinces Note 36*, December 2002. Accessed January 2020;

Morton, D.M., and Miller, F.K., 2006, *Geologic Map of the San Bernardino and Santa Ana 30' x 60' Quadrangles, California*: U.S. Geological Survey, Open-File Report OF-2006-1217, scale 1:100,000. Accessed January 2020.

Groundwater

California Natural Resources Agency, California Department of Water Resources, *California Groundwater Bulletin 118*, 2003, https://water.ca.gov/Programs/Groundwater- Management/Bulletin-118. Accessed January 2020;

Regional Water Quality Control Board (RWQCB) online database (GeoTracker), http://geotracker.waterboards.ca.gov/. Accessed January 2020.

Historical Topographic Maps

Maps provided by EDR on January 14, 2020.

Oil and Gas Records

State of California Department of Conservation, California Geologic Energy Management Division website: https://www.conservation.ca.gov/dog/Pages/Wellfinder.aspx. Accessed January 2020.

PFAS (Per- and Polyfluoroalkyl Substances)

California State Water Resources Control Board (SWRCB) online 2019 Statewide PFAS Investigation online Public Map Viewer:

https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=4feba1766c224dc9 9eadea06ef3bd019. Accessed January 2020.

Pipelines

National Pipeline Mapping System (NPMS) Public Map Viewer: https://www.npms.phmsa.dot.gov/PublicViewer/. Accessed January 2020.

Topography

United States Geologic Survey (USGS) topographic map (Corona North Quadrangle, 2018).

Other

Department of Toxic Substances Control (DTSC) online EnviroStor database: http://www.envirostor.dtsc.ca.gov/public/. Accessed January 2020.



Appendix A

Regulatory Records Search



Historical Research Documentation