

October 24, 2017

Ms. Danielle Vachon
Boulder Housing Partners
4800 North Broadway
Boulder, Colorado 80304

**RE: Phase I Environmental Site Assessment
Red Oak Park II 2625-2637
2625-2637 Valmont Road
Boulder, Boulder County, Colorado 80304
Farmer Project No.: 3011.26**

Dear Ms. Danielle Vachon,

Farmer Environmental Group, LLC is pleased to submit this Phase I Environmental Site Assessment (ESA) report to Boulder Housing Partners. This report discusses background information, purpose and scope of work, execution of work, conclusions, and recommendations (if applicable) for the Subject Site.

Regarding the continued viability of this ESA, ASTM International Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-13) states that an ESA "meeting or exceeding" this practice and completed less than 180 days prior to the date of acquisition of the property or (for transactions not involving an acquisition) the date of the intended transaction is presumed to be valid. Based on this viability statement, this ESA report is presumed to be valid for 180 days after October 23, 2017.

We appreciate the opportunity to provide professional environmental services to you, and if you have any questions or comments regarding this report, please contact the undersigned at (303) 468-8763.

Sincerely,
Farmer Environmental Group, LLC



Jennifer Day, P.E.
Branch Manager



Kurt A. Pierce
Environmental Specialist

Phase I Environmental Site Assessment

**Red Oak Park II 2625-2637
2625-2637 Valmont Road
Boulder, Boulder County, Colorado**

October 24, 2017

Prepared for:

Ms. Danielle Vachon
Boulder Housing Partners
4800 North Broadway
Boulder, Colorado 80304

Prepared by:

Farmer Environmental Group
8120 Sheridan Boulevard, Suite# A306
Westminster, Colorado 80003

Farmer Project No. 3011.26

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Red Oak Park II 2625-2637
2625-2637 Valmont Road
Boulder, Boulder County, Colorado

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PHASE I ENVIRONMENTAL SITE ASSESSMENT

**Red Oak Park II 2625-2637
2625 Valmont Road
Boulder, Boulder County, Colorado**

EXECUTIVE SUMMARY

On October 9, 2017, Farmer Environmental Group, LLC (Farmer) was contracted by Boulder Housing Partners (the "Client" herein) to conduct a Phase I Environmental Site Assessment (ESA) of the Red Oak Park II 2625-2637 located at 2625-2637 Valmont Road in Boulder, Boulder County, Colorado (the "Subject Site"), as shown on Figure 1 and Figure 2 herein and further detailed in this report. The scope of service, objectives, extent and limitations of the services and this report are described in more detail in the text of this report.

This Phase I ESA was performed in general accordance with the ASTM International Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-13) and is further described in the applicable sections and appendices of this report (Limitations and Scope of Work) with consideration of general industry standards. The purpose of this Phase I ESA was to identify *recognized environmental conditions* as defined by ASTM E1527-13. The findings and conclusions of this assessment are as follows:

- The Subject Site consisted of the Red Oak Park II 2625-2637 located at 2625-2637 Valmont Road in Boulder, Boulder County, Colorado. According to information obtained from the Boulder County Assessors, the Subject Site 2625-2637 Valmont Road, Boulder (Parcel ID: 146-320-300-041) encompassed 0.78 acres, 2637 Valmont Road, Boulder (Parcel ID: 146-320-347-001) encompassed 0.31 acres and (Parcel ID: 146-320-347-004) encompassed 0.22 acres of land. At the time of Farmer's site reconnaissance, Red Oak Park II 2625-2637 utilized the Subject Site as vacant property. According to the Boulder County Assessor information, the current owner of the Subject Site was identified as City of Boulder Housing Authority. Copies of the Boulder County Assessor records, which include a brief legal description and parcel map of the Subject Site, are included in the appendices.

Based on Farmer's site reconnaissance and information obtained from the Boulder County Assessor, there are no on-site structures.

- In consideration of the available historical information identified during this Phase I ESA, the Subject Site appears to have been undeveloped land from at least 1937 until the years between 1949 and 1953. Between 1949 and 1953, a building appeared on the north end of the Subject Site. Between 1953 and 1964, a mobile home park was constructed and encroached on to the Subject Site. Between 1964 and 1966, a building was constructed on the south end of the Subject Site. Between 1988 and 1994, an additional building was constructed adjacent to the building that is located at the south end of the Subject Site
-

Between 2006 and 2009 the mobile home park was removed from the Subject Site. Between 2011 to present the building on the south end of the subsite was demolished. The building located on the north end of Subject Site has been demolished. Farmer's review of historical resources, regulatory records, interviews, and site reconnaissance did not identify *recognized environmental conditions* attributable to historical uses of the Subject Site.

From between the years of 1953 and 1964 until present, surrounding land usage appears to have been limited to residential purposes, but there are a few retail businesses in the adjacent property's. Based on Farmer's review of historical resources, referenced sources, and regulatory database report (discussed in Section 6.1), and in consideration of Farmer's area reconnaissance, it does not appear the historical use of the surrounding properties represents a *recognized environmental condition* in connection with the Subject Site.

- Mr. Kurt A. Pierce, Environmental Specialist for Farmer, conducted a field investigation of the Subject Site on October 12, 2017. The following summarizes our observations pertinent to the executive summary. Additional observations of the Subject Site are discussed in Section 5.2.

The storm water from the ground level surface areas appeared to drain in south direction (toward roadside drainages on Valmont Road) via sheet flow.

The Subject Site has one on-site irrigation water wells discovered during site reconnaissance. Farmer's review of historical resources, referenced sources, and regulatory database reports and they showed no information on this irrigation well.

- As detailed in Section 6.1, local, state and federal regulatory databases and information was reviewed by Farmer for on-site and/or nearby regulated facilities indicative of *recognized environmental conditions* within the ASTM-specified radius of the Subject Site.

No regulatory listings associated with the Subject Site address (2625-2637 Valmont Road) during Farmer's review of the regulatory database report. However, documentation obtained from the regulatory database report indicates that in 2009 asbestos abatement and demolition of buildings located on subject site. During Farmer's reconnaissance of the subject site, no asbestos containing material was identified in the soil upon visual inspection. Farmer's review of historical resources, regulatory records and site reconnaissance did not identify *recognized environmental conditions* attributable to historical uses of the Subject Site.

Based upon the distance of separation, current regulatory status, type of regulatory listings identified for these facilities, conditions typical of the identified facility activities, and/or the topographic relationship, the remaining regulated facilities identified in the regulatory database report do not appear to represent a *recognized environmental condition* in connection with the Subject Site.

- Based on information summarized in Section 6.3 and as may be discussed elsewhere in this report, Farmer has identified no facilities that pose an apparent vapor encroachment condition (VEC) to the Subject Site. This determination does not appear to represent a *recognized environmental condition* in connection with the Subject Site.

Farmer has performed a Phase I ESA in general conformance with the scope and limitations of ASTM E1527-13 of the Subject Site. Any exceptions to, or deletions from, this practice are described in applicable sections of this report

Based on the findings and conclusions of this Phase I ESA, Farmer recommends no further environmental investigations of the Subject Site at this time.

This summary is for convenience only and should not be relied upon without first reading the full contents of this report, including appended materials.

1.0 INTRODUCTION

1.1 Purpose

As defined by ASTM E1527-13, this practice is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) liability: that is, the practice that constitutes all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined at 42 U.S.C. §9601(35)(B).

The purpose of this Phase I ESA was to identify *recognized environmental conditions* in connection with the Subject Site. As defined by ASTM E1527-13, “the term *recognized environmental conditions* means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.”

The term “*controlled recognized environmental condition*” as defined by ASTM E1527-13 is “a *recognized environmental condition* resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

The term “*historical recognized environmental condition*” as defined by ASTM E1527-13 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).”

The term “*de minimis condition*” as defined by ASTM E1527-13 is “a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis conditions* are not *recognized environmental conditions* nor *controlled recognized environmental conditions*.”

1.2 Scope of Services

The scope of services was performed in general conformance with ASTM E1527-13 and is further described in the applicable sections of this report with consideration of general industry standards. The purpose of this ESA was to identify “*recognized environmental conditions*” as defined by ASTM E1527-13. The scope of this contract included the following tasks:

TASK 1: Subject Site reconnaissance

- TASK 2: Surrounding land use observations
- TASK 3: Geological, hydrological, and topographical information
- TASK 4: Historical review of the Subject Site records and use
- TASK 5: Regulatory review of current and past activities on the Subject Site
- TASK 6: Data evaluation
- TASK 7: Report preparation

Soil sampling, groundwater or surface water testing, building materials sampling, drinking water testing, or other sampling and testing were not included in the scope of services of this ESA. This ESA is not a compliance audit, health and safety audit, or an additional Phase of environmental or engineering services and may not be construed as such. Where analytical results are available, the potential for contamination from these sources was evaluated and the results were included in this assessment.

The Phase I ESA consisted of a historical review of the Subject Site and area use, regulatory database review, assessment of the physical setting, Subject Site and area reconnaissance, and a report of Farmer's findings, opinions, conclusions, and recommendations. Data gaps or deviations from this standard (if applicable) are described in pertinent sections of this report.

Subject Site and Area Use

By reviewing or obtaining selected sources of reasonably ascertainable public information, Farmer reviewed the current and historical uses of the Subject Site. The Phase I ESA historical review attempts to extend back until at least 1940 or, for uses prior to that date, back to the time the Subject Site was undeveloped. Sources of historical use information relating to the Subject Site and its adjoining properties were acquired and/or reviewed according to the reasonable availability of the information, the time limits provided for data acquisition and review, as permitted, by the project schedule and cost, and Farmer's judgment of the likely value of the information for indicating environmental concerns. Historical sources reviewed by Farmer are identified in Section 9.0 (provided in Appendix E) and typically include local city directories, aerial photographs, and topographic maps. If available through the database provider, the historical sources reviewed also included historical fire insurance maps.

Regulatory Status Review

Farmer reviewed a report of select regulatory databases published for the local area to identify facilities potentially constituting a suspect *recognized environmental condition* in connection with the Subject Site. Farmer reviewed the databases to identify recorded facilities located on, or in close proximity to, the Subject Site using the ASTM E1527-13 standard environmental record sources and recommended approximate minimum search distances.

Farmer attempted to obtain additional information regarding listed facilities that, in its professional judgment, may constitute *recognized environmental conditions* in connection with the Subject Site. In addition, local agencies were contacted regarding recorded information, incidents, or activities of environmental concern relating to the Subject Site and its nearby properties.

If deemed reasonably ascertainable, necessary, or within the Client-approved scope of work, Farmer has conducted additional file review to obtain sufficient information in connection with regulatory listings of potential environmental concern, if insufficient information was provided via

standard sources. If, in Farmer's opinion, such a review is not warranted, Farmer has explained within the report the justification for not conducting additional regulatory file review.

As an alternative, Farmer may have reviewed files/records from an alternative source(s) such as on-site records, user provided records, records from local government agencies, interviews with regulatory officials or other individuals knowledgeable about the environmental conditions that resulted in the standard environmental record source listing.

Subject Site Physical Setting

Farmer obtained and reviewed reasonably ascertainable published Subject Site information to characterize the physical setting of the Subject Site. Sources reviewed are identified in Section 9.0 of this report. If reasonably ascertainable, Farmer reviewed the current United States Geological Survey (USGS) 7.5 Minute Topographic Map showing the area on which the Subject Site is located. Farmer reviewed one or more physical setting sources at the discretion of the Environmental Professional to obtain information about the geologic, hydrogeologic, hydrologic, or topographic characteristics of the Subject Site. Discretionary physical setting sources may have been sought if (1) conditions had been identified in which hazardous substances or petroleum products are likely to be present on-site or to migrate to the Subject Site from off-site sources and (2) more information is generally obtained, pursuant to local good commercial or customary practice.

Subject Site and Area Reconnaissance

The Subject Site and area reconnaissance consisted of field observations of the Subject Site and adjoining land areas by Farmer personnel experienced in conducting environmental site assessments. Farmer observed and documented current uses of the Subject Site and indicators of hazardous chemicals, petroleum products, storage tanks, odors, pools of liquid, drums, containers, polychlorinated biphenyls (PCBs), heating and cooling systems, stains, corrosion, drains and sumps, pits, ponds, lagoons, stressed vegetation, wastes, wells, and septic systems. The area reconnaissance was performed in publicly accessible areas on foot within areas that were reasonably accessible and at Farmer's discretion by automobile along public roads.

1.3 Significant Assumptions

Information obtained from the Client, the Client's representative, Subject Site owner(s), individuals interviewed, prior environmental reports, regulatory information, and information obtained from referenced sources was considered accurate unless Farmer's reasonable inquiries clearly revealed otherwise. Conditions observed were considered representative of areas that were not observed unless otherwise indicated.

The primary direction of groundwater flow was assumed to be dictated by topography and readily accessible geologic information, unless otherwise indicated by measurement of potentiometric surface or other quantifiable data. Additionally, the groundwater flow direction was assumed to control the distribution of impact, if present.

1.4 Limitations and Exceptions

A Phase I ESA is conducted to permit formulation of an opinion as to the potential for environmental liabilities at the Subject Site based on the gathering of limited information and observations. A Phase I ESA is not a comprehensive site characterization and should not be construed as such. The purpose of conducting the Phase I ESA is to reduce, not eliminate, the risk of an entity in its plans or purposes for the Subject Site. The conclusions expressed by Farmer regarding the conditions of the Subject Site addressed herein are based solely on the limited observations made and the data collected during this Phase I ESA. The beneficiaries of this Phase I ESA are hereby advised that conditions observed are subject to change.

The findings and conclusions presented in this ESA are relative to the dates the work was conducted and should not be relied on to represent conditions at later dates. The opinions included herein are based on information obtained during the assessment and Farmer's experience. If additional information becomes available that may influence Farmer's environmental assessment findings, Farmer requests the opportunity to review the information, reassess the potential concerns, and modify Farmer's opinions, if warranted.

This assessment included visual observations to identify obvious features or conditions indicative of *recognized environmental conditions*.

Although this assessment has attempted to identify *recognized environmental conditions*, Farmer cannot eliminate all uncertainty as to *recognized environmental conditions* in connection with the Subject Site nor represent or warrant that the Subject Site contains no hazardous substances or petroleum products or other latent conditions beyond those identified through the scope of work identified herein. Other features, conditions, and constituents may have escaped detection due to: (1) the limited scope of this assessment as driven by Client objectives, (2) the inaccuracy of public records or information reviewed by Farmer, (3) environmental incidents that may have gone undetected or unreported prior to this assessment, (4) inaccessible areas, and/or (5) deliberate concealment of detrimental information.

Farmer's professional services have been performed using the degree of care and skill ordinarily exercised, under similar conditions, by reputable environmental consultants undertaking similar studies and practicing in this locality during the same timeframe. No other warranties, express or implied, are intended or made with respect to this report or Farmer's services. This assessment was not exhaustive, and users of this report should consider the scope and limitations related to these services when developing opinions as to risks associated with the Subject Site. These potential risks may be more thoroughly evaluated as an additional service in an effort to further reduce, but not eliminate, uncertainty. Upon request, Farmer can provide options for additional research or assessment and anticipated additional cost and timing requirements.

This report presents an assessment of the Subject Site as defined by information provided by the Client, Client's representative, or Key Site Manager. Farmer's findings, opinions, conclusions, and recommendations are based on the locations and boundaries of the Subject Site as evident in the field and on maps, plats, or descriptive information provided by the Client, Client's representative, or Key Site Manager.

Farmer assumes the genuineness of the documents and that the information provided in this document or statements are true and accurate to the extent of these limitations. Farmer has prepared this Phase I ESA report in a professional manner using the degree of skill and care exercised for similar projects under similar conditions by reputable and competent environmental consultants. Farmer will not be responsible for conditions or consequences arising from relevant facts concealed, withheld, or not fully disclosed at the time the report was prepared.

This Phase I ESA was conducted for the benefit of Boulder Housing Partners and may only be relied upon, reissued or otherwise reproduced under the express written consent of Boulder Housing Partners and Farmer. Farmer is not responsible for the conclusions, opinions, or recommendations made by others based on this information.

1.5 Special Terms and Conditions

The work was conducted in general conformance with Farmer's proposal to conduct a Phase I ESA of the Subject Site authorized by Boulder Housing Partners on October 9, 2017, and the terms and conditions established therein. The User is defined as the party seeking to use ASTM E1527-13 to complete an ESA of the Subject Site. The User of this Phase I ESA is Farmer's Client, Boulder Housing Partners.

1.6 User Reliance

This report represents Farmer's services as of the date hereof. As Farmer's final document, it may not be altered after final issuance. This assessment and report were prepared on behalf of and for the exclusive use of Boulder Housing Partners solely for its use and reliance, subject to the terms and conditions agreed upon between Farmer and Boulder Housing Partners. The Client and Farmer were solely involved in shaping the scope of services. Accordingly, reliance on this report by any other party may involve assumptions leading to an unintended interpretation of findings and opinions. As such, reliance by other parties on the contents of this document is not granted, and any such reliance shall be at the sole risk of the using party. With the consent of Farmer and the Client and for a fee, Farmer may offer reliance to third parties or contract with other parties to develop findings and opinions related to such party's specific risk management objectives.

Farmer maintains a common law copyright on this report and services. Reproduction of or reliance upon this report may not be considered without mutual written consent of Farmer and the Client.

The observations and conclusions presented in this report reflect only those conditions apparent on the day of the field reconnaissance. Subsequent changes in Subject Site use or materials, equipment, or chemicals could alter Subject Site conditions. Other limitations of this Phase I ESA (if encountered) are described in applicable sections of this report.

2.0 SUBJECT SITE OVERVIEW

Subject Site Description:

The Subject Site consisted of the Red Oak Park II 2625-2637 located at 2625-2637 Valmont Road in Boulder, Boulder County, Colorado.

The Subject Site consisted of vacant lots. No structures present on site. Based on information obtained from the Boulder County Assessor and Farmer's site reconnaissance, the Subject Sites encompassed approximately 1.31 acres of combined parcels. The Boulder County Assessor data identified the current owner of the Subject Sites as City of Boulder Housing Authority. Copies of the Boulder County Assessor records, which include a brief legal description of the Subject Site, are included in the appendices.

According to the Boulder County Assessor, the Subject Site has not been zoned. An assessment of conformance with zoning regulations was not included as part of this Phase I ESA.

Description of On-site Structures:

No structures present on Subject Site.

Subject Site Utilities:

The Subject Site was reportedly provided with drinking water and sanitary sewer services by the City of Boulder. Xcel Energy reportedly provided electricity to the Subject Site and Xcel Energy reportedly provided natural gas to the Subject Site. No Structure present on Subject Site.

ASTM Questionnaires:

Environmental and User questionnaire, as prescribed by ASTM E1527-13, were not completed by the ESA report User or current owner of the Subject Site. Under the current ASTM E1527-13, the lack of a completed questionnaire constitutes a "data gap". Based on the information gathered for this assessment, including an interview with the Key Site Manager, it is the opinion of Farmer the lack of this information does not constitute a significant data gap or significantly affect Farmer's ability to identify *recognized environmental conditions* in connection with the Subject Site.

3.0 SITE BACKGROUND/OPERATING HISTORY

3.1 History of Ownership/Title Records

A chain-of-title was not included in the scope-of-work for this project. The Client did not provide Farmer with past or current Title Instrument documentation for the Subject Site.

According to the Boulder County Assessor information, the current owner of the Subject Site was identified as City of Boulder Housing Authority. The City of Boulder Housing Authority information indicated that the current owner was granted ownership in 2012.

3.2 Review of Aerial Photographs

Environmental Data Resources, Inc. (EDR) provided historical aerial photographs to Farmer for review. Aerial photographs dated 1937, 1941, 1949, 1953, 1964, 1966, 1971, 1978, 1983, 1988, 1994, 1999, 2002, 2005, 2006, 2009, and 2011 were purchased from EDR. Copies of the aerial photographs are provided in Appendix E. The following is a summary of the observations made from these photographs. It should be noted that due to the scale and clarity of some of the aerial photographs, specific details with regard to structure types and/or uses observed by Farmer were difficult to discern.

1937-1941

The Subject Site appeared to consist of undeveloped land. Valmont Road is on the south border of the Subject Site. Sparse residential properties were present in the general vicinity of the Subject Site.

1949 – 1953

A building was constructed on the north end of the Subject Site. The remainder of the Subject Site appeared to consist of undeveloped land. The remaining aspects in close proximity to the Subject Site appeared similar to the 1941 aerial photograph.

1953 – 1964

Between 1953 and 1964, a mobile home park was constructed and encroached on to the Subject Site. The building located on the north end of Subject Site has been demolished. These aerial photographs appeared to depict the Subject Site and surrounding properties are in a state of residential housing development.

1964 – 1988

Between 1964 and 1988, no improvement to Subject Site or it buildings occurred.

1988 – 1994

Between 1988 and 1994, an additional building was constructed adjacent to the building that is located at the south end of the Subject Site

1994 – 2006

No improvement to Subject Site or it buildings occurred.

1994 – 2006

Between 2006 and 2009 the mobile home park was removed from the Subject Site.

2006 – Present

Between 2006 to present the building on the south end of the subsite was demolished.

3.3 Historical Maps and Documents

Fire Insurance Maps

In the late nineteenth century, companies began preparing maps for use by fire insurance companies and municipalities. These maps show construction materials of specific structures in developed urban areas. With the advent of retail gasoline service stations, the approximate locations of tanks were commonly noted, often without AST or UST designations. In addition, the locations of chemical storage and uses of retail, commercial, and industrial buildings were often described. These maps were updated and expanded geographically periodically through the twentieth century.

Farmer contacted EDR to provide coverage for historical fire insurance maps. According to EDR, no maps were available for the Subject Site vicinity. Due to the location of the Subject Site (outside of a main business district), historical fire insurance maps are not anticipated to cover the Subject Site vicinity.

Historical Topographic Maps

Farmer was provided with the following historical U.S. Geological Survey (USGS) topographic maps by EDR for review: 1902 (Boulder 15 Minute Quadrangle), 1904 (Boulder and Niwot (15-minute Quadrangle), 1957 (Boulder 7.5-minute Quadrangle) 1966-1967, 1971, 1979, 2013 (Boulder and Niwot 7.5 Minute Quadrangle).

Farmer's review of the referenced topographic maps indicated that the Subject Site was located at an elevation of approximately 5,317 feet above mean sea level. The primary topography of the Subject Site was shown to slope gradually to the east/southeast toward an Whiterock ditch located less than a quarter mile away from the Subject Site. The topographic maps reviewed by Farmer did not depict structures on the Subject Site. In addition, no features indicative of apparent environmental concern (e.g. oil/gas wells, pipelines) were depicted on or in close proximity to the Subject Site.

Other Historical Maps and Documents

Farmer requested historical maps for review from the Client, Subject Site owner, Key Site Manager, and/or local agencies such as as-built plans, site surveys, and other available maps. With the exception of maps obtained from referenced sources, no other historical maps were provided for review.

Historical City Directories

Farmer obtained historical city directory information for the Subject Site and surrounding properties from EDR. Various directories dating from 1963 to 2013 were available for review and/or researched by EDR over approximate five-year intervals.

Listings associated with the Subject Site address (2625-2637 Valmont Road) were limited to Dickensheets Construction (1963 to between 1968 and 1973), Wallace Vacuum (1973-2008) and Blue Spruce Sewing (between 2008 and 2013). The city directory listings associated with nearby properties were limited to individuals, presumably residential properties and some commercial businesses. No listings indicative of apparent environmental concern (e.g. gas stations, dry cleaning facilities) were identified in close proximity to the Subject Site.

3.4 Previous Assessment Reports

Farmer requested copies of any previous reports relating to the environmental conditions and history of the Subject Site from the report User, the Subject Site Owner, and the Key Site Manager. No previous assessment reports were provided for review or inclusion in this report.

3.5 Interviews Regarding Historical Uses

Farmer was unable to interview contacts for previous Subject Site ownership due to an inability to identify appropriate contacts, lack of response, and/or confidentiality concerns. Farmer considers the lack of interviews regarding historical uses of the Subject Site to represent a limitation under ASTM E1527-13. Based on the information gathered for this assessment, it is the opinion of Farmer that this limitation regarding historical uses of the Subject Site does not constitute a significant data gap or significantly affect Farmer's ability to identify *recognized environmental conditions* in connection with the Subject Site. Due to the observed uses of the adjacent properties, no adjacent property or facility owners were interviewed for the purposes of this ESA. None of the adjacent properties appeared to be abandoned sites.

3.6 Summary of Historical Information

In consideration of the available historical information identified during this Phase I ESA, the Subject Site appears to have been undeveloped land from at least 1937 until the years between 1949 and 1953. Between 1949 and 1953, a building appeared on the north end of the Subject Site. Between 1953 and 1964, a mobile home park was constructed and encroached on to the Subject Site. The building located on the north end of Subject Site has been demolished. Between 1964 and 1966, a building was constructed on the south end of the Subject Site. Between 1988 and 1994, an additional building was constructed adjacent to the building that is located at the south end of the Subject Site. Between 2006 and 2009 the mobile home park was removed from the Subject Site. Between 2011 to present the building on the south end of the Subject Site was demolished.

From between the years of 1953 and 1964 until present, surrounding land usage appears to have been limited to residential purposes, but there are a few retail businesses in the adjacent property's.

Historical occupants of the Subject Site do not appear to have been engaged in activities indicative of apparent environmental concern, such as dry cleaning or industrial manufacturing facilities. Farmer's review of historical resources, regulatory records, and site reconnaissance did not identify *recognized environmental conditions* attributable to historical uses of the Subject Site.

Data failure was not encountered during this assessment, as the earliest documented historical land use was a 1937 aerial photograph. This was not considered to represent a significant data gap that affected the ability of the environmental professional to identify *recognized environmental conditions*. If instances of data failure resulted in significant data gaps that affected the ability of the environmental professional to identify *recognized environmental conditions*, those data gaps are discussed in applicable sections of the ESA.

4.0 ENVIRONMENTAL SETTING

4.1 Topography

Based on a review of the USGS Boulder, Colorado Topographic Map, the Subject Site is located at approximately 5,317 feet above mean sea level. The primary topography of the Subject Site is shown to slope gradually toward the east/southeast. Surface drainage in the area is anticipated to flow toward the east/southeast in the direction of Whiterock Ditch, which is located less than a quarter mile to the southeast. Farmer's on-site observations generally corresponded to the information provided by the topographic maps. It should be noted that development activities on and in close proximity to the Subject Site, such as adjoining roadways, has influenced the local topography resulting in variable flow direction of surface water (when present).

4.2 Geology

According to information received from EDR, the geology at the Subject Site is characterized as a stratified sequence of the Mesozoic Era, Cretaceous System and Woodbine & Tuscaloosa Groups. The geology in this system consists primarily of clay loam and very gravelly loam.

4.3 Hydrology

Farmer's assessment of wetlands and potential jurisdictional Waters of the U.S. was limited to research of published information, interviews, and visual observations. It should be noted that wetlands cannot be definitively identified through visual observation alone. Defensible wetland delineations require taxonomic classification of site vegetation, an investigation into the surface and subsurface hydrology of the site, and identification of hydric soils. This level of delineation is outside of the scope of work for this assessment. Farmer's site reconnaissance and review of historical resources did not indicate the presence of former or current surface water features on the Subject Site.

Farmer's review of the United States Department of the Interior National Wetland Inventory (NWI) digital map obtained from the United States Fish and Wildlife Service's (USFWS) Wetlands Mapper, did not identify designated wetlands on or immediately adjoining the Subject Site.

Farmer's review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Community Panel Number FM08013CO394J (dated December 18, 2012) indicated that the Subject Site was located within Zone X (non-shaded), which is an area determined to be outside the 0.2 percent annual chance floodplain.

Groundwater occasionally occurs in shallow, discontinuous or "perched" water bearing units where the soils are in contact with the unweathered bedrock or an impermeable soil layer. These shallow units are infrequently utilized, but are the water bearing zones with the potential to be impacted by releases from UST facilities or other surface/subsurface sources. Flow direction in these units is highly variable, but is generally toward the nearest down gradient water body (lakes, creeks, rivers) and can be approximated by observing the surface topography. Recharge areas for these perched aquifers are very localized, and they can be influenced by surface development of impervious cover (buildings, parking lots, roads), major road construction (underpasses, utility trenches), and variations in annual rainfall. A subsurface investigation including the installation of a minimum of

three monitoring wells would be required to accurately determine groundwater gradient on the Subject Site. Based on the topographic and geologic information identified in this report, the anticipated depth to perched groundwater on the Subject Site is approximately 20 to 50 feet below ground surface and the subsurface gradient would be anticipated to be toward the east/southeast.

5.0 RESULTS OF THE ON-SITE INVESTIGATION

Mr. Kurt A. Pierce, Environmental Specialist for Farmer, conducted a field investigation of the Subject Site on October 12, 2017. At the time of the field investigation, the weather was clear with temperatures in the 80s (F). The Subject Site was not obstructed by weather-related or natural obstructions. The Subject Site location map is included in Appendix A as Figure 2. Photographs of the Subject Site and surrounding properties are provided in Appendix C.

5.1 Methodology and Limiting Conditions

Farmer visually and physically observed accessible areas of the Subject Site. No Structure present on Subject Site.

5.2 Observations

Subject Site Overview

Farmer was not escorted during the field reconnaissance. The information provided by Key Site Manager is identified in appropriate sections of this report.

The Subject Site is vacant land with no structures.

Storm Water Drainage Observations

The storm water appears to flow to the municipal storm water drainage system located on Valmont Road.

Source of Drinking Water

The City of Boulder currently provides drinking water service to the Subject Site. According to the most recent Annual Drinking Water Quality Report (2016), the drinking water meets or exceeds all state and federal regulations with respect to drinking water quality.

Sewage Disposal/Septic System

The City of Boulder currently provides sanitary sewer service to the Subject Site. No septic systems or sewage pretreatment systems were observed or reported to be on the Subject Site.

Storage Tanks and Associated Equipment

No indications of underground storage tanks (USTs), aboveground storage tanks (ASTs) or associated equipment (e.g. fill ports) were observed or reported on the Subject Site.

Hazardous Chemicals and Petroleum Products

No indications of leaks or spills of hazardous chemicals or petroleum products were observed on the vacant lot during Farmer's site reconnaissance. Based on the field observations, no *recognized environmental conditions* were identified with respect to hazardous chemical and petroleum products on the Subject Site.

Odors

No unusual odors were detected on the Subject Site at the time of the investigation.

Surface Staining, Corrosion and Stressed Vegetation

No significant surface staining, corrosion or stressed vegetation was observed on the Subject Site during Farmer's site reconnaissance.

Polychlorinated Biphenyls (PCBs)

PCBs were commonly used in electrical and hydraulic equipment prior to an EPA ban on this chemical in 1978. Farmer included observations of the Subject Site systems for potential PCB containing equipment.

No potential PCB-containing equipment such as electrical transformers, hydraulic lifts, or trash compactors were observed on the Subject Site.

Heating and Cooling Systems

No structure present on Subject Site.

Drains, Sumps, or Pre-treatment Systems.

No drains, sumps, or pre-treatment systems were reported or observed on the Subject Site.

Pits, Ponds or Lagoons

No pits, ponds or lagoons were observed on the Subject Site.

Solid Waste Disposal

No Structure present on Subject Site. No evidence of onsite disposal was observed.

Wastewater Discharges

No industrial wastewater discharges occur at the Subject Site.

Wells or Cisterns

A well was observed on the East Parcel (2537 Valmont Road) of Subject Site. It was not clear if this was a monitoring or domestic well. An investigation into potential water rights should be conducted to evaluate whether this well could be used for irrigations purposes with further development of the property.

Rail Road Spurs or Pipelines

No active or inactive railroad spurs or petroleum pipeline systems were observed on or adjacent to the Subject Site.

5.3 Adjoining Property Observations

Adjoining properties were visually examined from public access right-of-ways to make a cursory assessment of the current land use and its potential for recognized environmental conditions that may have impact on the Subject Site. Reconnaissance of adjoining properties was performed by viewing land use from legal boundaries or by walking upon the adjoining properties that were legally accessible. Adjoining developments to the Subject Site are as follows:

North: Residential Housing;
East: Red Oak Park Housing Community

South: Valmont Road; and Goose Creek Medical Building
West: 7-11 Convenience Store; and Small Business Complex.

Farmer's observation of the adjoining/nearby properties did not identify facilities that may represent *recognized environmental conditions* in connection with the Subject Site. Regulated facilities located in the vicinity of the Subject Site are described in Section 6.0.

6.0 REGULATORY/GOVERNMENTAL AGENCY INQUIRIES

6.1 Federal and State Regulatory Agencies

State and Federal regulatory database information for the vicinity of the Subject Site was obtained from EDR. The EDR database records follow the ASTM E1527-13 search distances and availability. In some cases, additional database records are available, and these databases are described if properties or facilities are identified that may pose a *recognized environmental condition* in connection with the Subject Site. Unless otherwise stated, the regulatory records reviewed by Farmer were considered to provide sufficient information to evaluate the potential existence of a *recognized environmental condition*, *historical recognized environmental condition*, *controlled recognized environmental condition*, or a *de minimis condition* in connection with the Subject Site.

A radius map and summarization page of the findings of the EDR research is included with the database information, which is provided in Appendix F. In addition, EDR has provided definitions for the various database functions.

In summary, the EDR research included a review of the following databases:

- US Environmental Protection Agency (EPA) National Priorities List (NPL);
- EPA Resource Conservation and Recovery Information System (RCRIS) Treatment, Storage, and Disposal Facilities (RCRIS TSD) list;
- EPA RCRIS Corrective Actions (CORRACTS) database;
- EPA RCRIS Violations/Enforcement Actions (RCRA Violator) list;
- EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS);
- EPA CERCLIS No Further Remedial Action Planned (NFRAP) sites list;
- EPA RCRIS Large Generators (RCRIS LG)/Small Generators (RCRIS SG) lists;
- EPA Emergency Response Notification System (ERNS) list;
- Colorado State Superfund list;
- Colorado State CERCLIS Equivalent (SCL) database;
- Colorado Industrial Hazardous Waste (IHW) database;
- Colorado Leaking Petroleum Storage Tanks (LPST) list;
- Colorado registered UST and AST list;
- Colorado Solid Waste/Landfills Permit Application (SWLF) file;
- Colorado Voluntary Cleanup Program (VCP); and
- Colorado Spills Report.

The following table includes the approximate minimum search distances and a list of the databases reviewed. These databases were selected based on minimum requirements of ASTM E1527-13. The number of facilities indicates the number of regulated facilities identified by the database provider to be present within the approximate minimum search distance for a particular database.

ASTM FEDERAL, STATE, & TRIBAL DATABASE LISTS								
Database	Approximate Minimum Search Distance (Miles)	Target Property	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	<1	Total Plotted
NPL/Equivalents	One Mile	0	0	0	0	0	NR	0
Delisted NPL	One Mile	0	0	0	0	0	NR	0
CERCLIS/Equivalent s	One-Half Mile	0	0	0	0	NR	NR	0
CERC-NFRAP Sites	One-Half Mile	0	0	0	0	NR	NR	0
CORRACTS	One Mile	0	0	0	4	0	NR	4
RCRA Generators	One-Quarter Mile	0	0	1	NR	NR	NR	1
RCRA TSD Facilities	One-Half Mile	0	0	0	0	NR	NR	0
ERNS	Subject Site	0	NR	NR	NR	NR	NR	0
Spills	Subject Site	0	NR	NR	NR	NR	NR	0
SHWS	One Mile	0	0	0	0	0	NR	0
SWF/LF Report	One-Half Mile	0	0	0	1	NR	NR	1
CLI	One-Half Mile	0	0	0	0	NR	NR	0
LUST/LPST List	One-Half Mile	0	1	6	17	NR	NR	24
UST List	One-Quarter Mile	0	1	6	NR	NR	NR	7
VCP List	One-Half Mile	0	0	1	0	NR	NR	1
IOP	Subject Site	0	NR	NR	NR	NR	NR	0
AST	One-Quarter Mile	0	1	1	NR	NR	NR	2
LIENS	Subject Site	NR	NR	NR	NR	NR	NR	NR
Drycleaners	One-Quarter Mile	0	0	0	NR	NR	NR	0
AUL	One-Half Mile	0	0	0	0	NR	NR	0
Brownfields Sites	One-Half Mile	0	0	0	0	NR	NR	0

NR – Not Requested at this Search Distance

The database research identified no regulated facilities associated with the Subject Site address (2625-2637 Valmont Road) or Red Oak Park II 2625-2637.

Based upon the distance of separation, current regulatory status, type of regulatory listings identified for these facilities, conditions typical of the identified facility activities, topographic relationship, and/or lack of reported releases, the remaining regulated facilities identified in the regulatory database report do not appear to represent a *recognized environmental condition* in connection with the Subject Site.

EDR provides three proprietary databases that identify historical manufactured gas plants, cleaners and auto stations that are known to EDR, typically based on city directory reviews and/or Sanborn Maps. Facilities included on this database typically operated before current regulations requiring notification/registration. These facilities may not be listed on regulatory databases but may be suspect *recognized environmental conditions* due to proximity to the Subject Site. Farmer reviewed the historical facility databases and six historical facilities (auto stations and cleaners) were identified. Based on the distance of separation, topographic relationship, and/or lack of reported release(s), the historical facilities do not appear to represent a *recognized environmental condition* in connection with the Subject Site.

The database report listed four “orphan” facilities (facilities that were not mapped in the database report due to poor or inadequate address information). Based upon Farmer’s area reconnaissance,

distance of separation, type of regulatory listings identified for these facilities, conditions typical of the identified facility activities, and/or topographic relationship the orphan facilities do not appear to represent a *recognized environmental condition* in connection with the Subject Site.

6.2 Local Government Inquiries

City of Boulder

Farmer submitted an open records request to the City of Boulder for the Subject Site for distribution to pertinent city departments. According to the response (dated October 20, 2017), the Environmental Services Division and Fire Marshall had no records responsive to Farmer's request.

Boulder County

Farmer submitted an open records request to Boulder County for the Subject Site for distribution to pertinent county departments. According to the response (dated October 20, 2017), the Environmental Services Division and Fire Marshall had no records responsive to Farmer's request.

6.3 Limited Vapor Encroachment Screening

In general accordance with ASTM E1527-13, Farmer has utilized the referenced sources, EDR Vapor Encroachment Screen, and visual reconnaissance in order to assess the potential for vapor migration, attributable to substances such as volatile organic compounds (VOCs), which may represent a vapor encroachment condition (VEC) in connection with the Subject Site. ASTM International has published a *Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions* (ASTM E2600-10). ASTM E2600-10 defines a VEC as the presence or likely presence of vapors from chemicals of concern (COCs) in the subsurface of a property caused by the release of vapors on or near the property. The presence within a building of hazardous substances such as vapors that have migrated into a building from a "release into the environment" (i.e. from a release outside of the building) can result in CERCLA liability. Vapor migration in the subsurface is described in ASTM E2600-10; however, ASTM E1527-13 states that "nothing in this practice should be construed to require application of the ASTM E2600-10 standard to achieve compliance with all appropriate inquiries".

Farmer conducted a Limited Vapor Encroachment Screening (VES) of the Subject Site utilizing general procedures laid out in ASTM E2600-10. The practices laid out in ASTM E2600-10 provide useful information for evaluation of the potential condition using terminology that is clearly defined and widely recognized. Additionally, ASTM E2600-10 presents assessment approaches that are beyond the scope of ASTM E1527-13 and this Phase I ESA. Although this Limited VES draws upon the concepts laid out in ASTM E2600-10 and uses the terminology defined therein, this section represents assessment procedures required by ASTM E1527-13, but less than an ASTM International Tier 1 VES as described in ASTM E2600-10. Moreover, the information on which this Limited VES is based is limited solely to that identified during the course of the Phase I ESA.

The following table presents the *approximate minimum search distance* for Standard Environmental Record Sources for petroleum and non-petroleum COCs to identify potential areas of concern generated via the EDR Vapor Encroachment Screen. The term "*approximate minimum search distance*" is measured from the Subject Site to a known or suspect source of soil and/or

groundwater contamination. These record sources were selected based on minimum requirements of ASTM E2600-10 and were augmented to include facilities that are commonly encountered and identified through other sources considered in a Phase I ESA. The number of facilities indicates the number of known or suspect contaminated sites identified during review of the standard record sources.

Standard Environmental Records	Maximum Search Distance	Subject Site	< 1/10 th	1/10 th to 1/3 rd
Federal NPL	0.333	0	0	0
Federal CERCLIS	0.333	0	0	0
Federal RCRA CORRACTS	0.333	0	0	0
Federal RCRA non-CORRACTS TSD	0.333	0	0	0
Federal RCRA generators	SS	0	-	-
Federal institutional control/engineering control registries	0.333	0	0	0
Federal ERNS	SS	0	-	-
State- and tribal-equivalent NPL	0.333	0	0	0
State- and tribal-equivalent CERCLIS	NS	-	-	-
State and tribal landfill and/or solid waste disposal site	0.5	0	0	0
State and tribal leaking storage tank	0.333	0	0	0
State and tribal registered storage tank	0.25	0	0	0
State and tribal institutional control/engineering control registries	SS	0	-	-
State and tribal voluntary cleanup	0.333	0	0	0
State and tribal Brownfield sites	0.333	0	0	0
Other Standard Environmental Records	0.333	0	0	0
Historical Use Records				
Former manufactured gas plants	0.333	0	0	0
EDR Exclusive Records	0.25	0	2	4
Historical dry cleaners	0.25	0	0	0
Exclusive recovered government archives	NS	-	-	-

Distances listed in miles

SS = Subject Site

NS = Not Searched

Vapor Encroachment Condition (VEC) Classifications:

VEC Exists

VEC Likely

VEC Cannot be ruled out

VEC Can be ruled out

Based on information summarized in the preceding table and as may be discussed elsewhere in this report, Farmer has identified no facilities that pose an apparent VEC to the Subject Site.

7.0 CONCLUSIONS AND RECOMMENDATIONS

Farmer has performed a Phase I Environmental Site Assessment in conformance with scope and limitations of ASTM E1527-13 of the Subject Site. Any exceptions to, or deletions from, this practice are described in applicable sections of this report.

Based on the findings and conclusions of this Phase I ESA, Farmer recommends no further environmental investigations of the Subject Site at this time.

8.0 CERTIFICATION AND QUALIFICATIONS

Signature of Environmental Professional(s)

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

A handwritten signature in black ink, appearing to read "Jennifer Day". The signature is fluid and cursive, with the first name "Jennifer" written in a larger, more prominent script than the last name "Day".

Jennifer Day, P.E.
Environmental Professional

Qualifications of Farmer Personnel

In accordance with ASTM E1527-13, this report includes the qualifications of the *Environmental Professional*, and the qualifications of the personnel conducting the site reconnaissance and interviews, if conducted by someone other than an *Environmental Professional*. These qualifications are documented in the appendices.

9.0 REFERENCES

References used in preparation of this report are cited throughout the text and/or provided below.

US Department of the Interior, Digital NWI Wetlands Map, obtained from the United States Fish and Wildlife Service's Wetlands Mapper;

Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Community Panel Number FM08013CO394J (dated December 18, 2012);

Historical Aerial Photographs, purchased from EDR, dated 1937, 1941, 1949, 1953, 1964, 1966, 1971, 1978, 1983, 1988, 1994, 1999, 2002, 2005, 2006, 2009, and 2011;

EDR-City Directory Image Report, Red Oak Park II, 2625 Valmont Road, Boulder, Colorado, 80304 Inquiry Number 5072040.5, dated October 12, 2017;

EDR-Certified Sanborn Map Report, Red Oak Park II, 2625 Valmont Road, Boulder Colorado, 80304 Inquiry Number 5072040.3, dated October 9, 2017;

Historical Topographic Maps, purchased from EDR, 1902 (15 Minute), 1904 (Boulder and Niwot, 15 Minute) 1957 (Boulder 7.5 Minute), 1966/1967, 1971, 1979, and 2013 (Boulder And Niwot, 7.5 Minute));

EDR-Vapor Encroachment Screen, Red Oak Park II, 2625 Valmont Road, Boulder, Colorado, 80304 Inquiry Number 5072040.2s, dated October 16, 2017; and

EDR-Radius Map with Geocheck, Red Oak Park II, 2625 Valmont Road, Boulder, Colorado, 80304 Inquiry Number 5072040.2s, dated October 9, 2017.