
**Phase I Environmental Site Assessment
for the Westside Solar Site
Kittitas County, Washington**

October 2019

Prepared for:

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Executive Summary

Ecology and Environment, Inc. (E & E) conducted this Phase I Environmental Site Assessment (ESA) for the Westside Solar site, located at 47.175688° N, -120.970776° W (latitude, longitude) in Kittitas County, Washington (subject property). This Phase I ESA was conducted in accordance with American Society for Testing and Materials (ASTM) E2247-16, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property* (ASTM 2016). No sampling of soil, water, building materials, or other materials was conducted as part of this Phase I ESA. It should be noted this Phase I ESA report is valid for 180 days from the date of the site visit.

The subject property is an approximately 46-acre tract made up of six separate land parcels (Kittitas County Tax Parcel Numbers: 19440, 19441, 19442, 10577, 10579 and 10580) and located approximately 0.5 mile southwest of South Cle Elum, Washington. This Phase I ESA was conducted on behalf of Westside Solar, LLC, the User, and Heelstone Development, LLC and Puget Sound Energy in anticipation of a possible purchase and development of the property.

The information obtained from records review, aerial photograph interpretation, and the on-site reconnaissance of the subject property did not identify any recognized environmental conditions (RECs) or historical recognized environmental conditions. However, one finding was identified as being an area of environmental interest, which is defined as an area or areas of the property with indications of activity that could have resulted in the presence of an REC. Following is a summary of findings:

- The subject property is located on an approximately 46-acre tract of vegetated land that has been historically used as farmland. The property is approximately 1,938 to 1,963 feet above mean sea level. Westside Road borders the property to the south, and Iron Horse Trail (a gravel, multi-use path) borders the property to the north. The subject property is bordered by residential properties and farmsteads across Westside Road to the south, and farmsteads with grazing land, agricultural land, and wooded areas to the east and west.
- An approximately 10-foot-long by 6-foot-wide shed is located on the southeastern portion of the property within a clearing. The shed is equipped with a lock and was not accessible. Based on the interview with the property owner, the shed is not used for chemical storage.

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- One tractor and associated farming equipment are stored near the northern tree line of the forested area located along the southern boundary (Appendix A, Photos 3 and 4). The farming equipment appeared to be in good condition and there was no evidence of staining or releases of mechanical fluids. This feature is not considered an REC.
- One pole-mounted transformer is located along the center of the southern boundary (Appendix A, Photo 9). The transformer appeared in good condition and no evidence of leaks were observed. This feature is not considered an REC.
- Two drinking water wells were identified on the Washington State Department of Ecology database for water wells; however, these wells were not visually identified during the field inspection. The subject property is located within the Upper Yakima River Watershed.
- A quarry is located adjacent to the north of the subject property (Appendix A, Photo 12). Iron Horse Trail traverses the northern boundary of the subject property from east to west (Appendix A, Photo 14) along the boundary between the northern adjacent quarry. An approximately 5,000-gallon tanker truck used to hold compressed gas of unknown contents with a placard marked “INERT” is located on the quarry property near the entrance. (Appendix A, Photo 12). The tank appeared to be in good condition with no evidence of corrosion or leaks. This feature is not considered an REC.
- Iron Horse Trail bisects the northern adjacent property along the northern boundary of the subject property. A review of historic topographic maps revealed that the Iron Horse Trail was previously used as a railroad. The trail appears to be well maintained, and no staining or evidence of spills was observed. However, it is unknown what was historically carried along this trail when it was utilized as a railway or how long the railway was in service. Railways have the potential to have used hazardous substances and petroleum products, including those containing polychlorinated biphenyls (PCBs), heavy metals, solvents, and other chemicals for maintaining the railway access and vicinity, and creosote to maintain the former wood rail ties. The trail is considered an area of environmental interest.
- Residential properties and farmsteads adjoin the southern, eastern, and western boundaries of the property. No off-site RECs were identified within a mile of the subject property.
- No indications of environmentally hazardous spills or other concerns were identified during the reconnaissance of the subject property.

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- The online database records search identified non-subject property environmental records inside of the respective search radii. A review of these records shows that the listed sites are not of environmental concern to the subject property due to the distance and gradient of these sites from the subject property. Review of agency records for the subject property did not identify outstanding compliance issues or current or historical remediation at the subject property or adjoining properties.
- The field reconnaissance did not identify evidence of denuded vegetation or stained soils that may indicate the presence of contamination from commercial or industrial activity.

Data gaps that were encountered during this Phase I ESA include the following:

- City directories were unavailable for the subject property and immediate vicinity.
- Sanborn Fire Insurance maps were unavailable for the subject property and immediate vicinity.
- Farmers and homeowners hold the adjoining properties. While E & E was on the subject property, the owners of these properties were unavailable.

There were no signs of petroleum sources or hazardous substances on adjoining properties that indicate an existing or historical release. Surface water and stormwater conveyances on the subject property were free of oil or signs of other environmental impacts.

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Abbreviations and Acronyms

AMSL	above mean sea level
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
CORRACTS	Corrective Action Sites
CREC	controlled recognized environmental condition
E & E	Ecology and Environment, Inc.
Ecology	Washington State Department of Ecology
EDR	Environmental Data Resources, Inc.
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment
HREC	historical recognized environmental condition
HSWA	Hazardous and Solid Waste Amendments
IC/EC	Institutional Controls/Engineering Controls
kg	kilograms
LPST	Leaking Petroleum Storage Tank
LQG	Large Quantity Generator
MLRA	Major Land Resource Area
NCP	National Oil and Hazardous Substance Pollution Contingency Plan
NFRAP	No Further Remedial Action Planned
NonGen	Non-Generator
NPL	National Priorities List (also, Superfund)
PCB	polychlorinated biphenyl
PST	petroleum storage tank

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RCRA	Resource Conservation and Recovery Act
RCRIS	Resource Conservation and Recovery Information System
REC	recognized environmental condition
SHWS	State Hazardous Waste Site
SQG	Small Quantity Generator
SWF	Solid Waste Facility
TBA	Targeted Brownfields Assessment
TSDF	Treatment, Storage, and Disposal Facility
USEPA	U.S. Environmental Protection Agency
User	Westside Solar, LLC
USGS	United States Geological Survey
UST	underground storage tank
VCP	Voluntary Cleanup Program

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1 Introduction

Ecology and Environment, Inc. (E & E) conducted this Phase I Environmental Site Assessment (ESA) for the Westside Solar site, located at 47.175688° N, -120.970776° W (latitude, longitude) in Kittitas County, Washington (subject property). The subject property is an approximately 46-acre tract made up of six separate land parcels (Kittitas County Tax Parcel Numbers: 19440, 19441, 19442, 10577, 10579 and 10580) and located approximately 0.5 mile southwest of South Cle Elum, Washington, along Westside Road (Figures 1-1, 1-2, and 1-3). This Phase I ESA was conducted on behalf of Westside Solar, LLC, the User, and Heelstone Development, LLC and Puget Sound Energy in anticipation of a possible purchase and development of the property.

This Phase I ESA consists of the following: a review of available local, county, state, and federal documents; examination of historical aerial photographs and topographic maps; an interview with the subject property owner; and a visual reconnaissance of the subject property. Photos taken during visual reconnaissance of the property are available in Appendix A; the Environmental Data Resources, Inc. (EDR) report in Appendix B (EDR 2019a); historical aerial photos in Appendix C (EDR 2019b); and topographic maps of the property in Appendix D (EDR 2019c). This Phase I ESA was conducted in accordance with American Society for Testing and Materials (ASTM) E2247-16, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property* (ASTM 2016). Deviations from the ASTM standard are described in the sections where they occur. No sampling of soil, water, building materials, or other materials was conducted as part of this Phase I ESA.

Regulatory database searches were conducted using the subject property boundary provided by the User (Appendix B; EDR 2019a). This report presents the findings, opinions, and conclusions made as a result of the Phase I ESA of this property.

1.1 Purpose

The purpose of this Phase I ESA is to identify actual and potential environmental liabilities associated with the subject property. Except as noted, this Phase I ESA was conducted in accordance with ASTM E2247-16. As such, this assessment addresses recognized environmental conditions (RECs) that indicate an existing release, past release, or material threat of a release of hazardous substance or petroleum product into structures on the property or into the ground, groundwater, or surface waters. This effort includes: historical recognized environmental conditions (HRECs), such as a past release of hazardous

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substances or petroleum products that would have been a REC(s) but was addressed to the satisfaction of the applicable regulatory authorities for unrestricted (residential) use; controlled recognized environmental conditions (CRECs) resulting from a past release of hazardous substances or petroleum products that have been addressed to the satisfaction of applicable regulatory authorities with engineering controls; areas of environmental interest that may indicate activities that could have resulted in the presence of an REC, especially areas where hazardous substances or petroleum products may be used, handled, managed, or stored, or may have been used, handled, managed, or stored in the past, property use restrictions, or other use limitations that indicate the property is not suitable for unrestricted use. RECs do not include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies. The user provided a title search which included a search for environmental liens. No records of environmental liens were found to be in connection with the subject property.

1.2 Detailed Scope of Service

This Phase I ESA consisted of the following efforts:

- Performing a site visit to the subject property in Cle Elum, Washington, to view present conditions and assess hazardous substances or petroleum products usage (presence of aboveground [ASTs] or underground storage tanks [USTs], storage of acids, etc.) and evaluate likely environmentally hazardous site history;
- Evaluating the risks of neighboring properties upon the subject property and reviewing federal, state, local, and tribal records out to distances specified by ASTM E2247-16 and all appropriate inquiries standards (ranging from 0.25 to 1 mile, depending on the database);
- Interviewing available persons with knowledge of the property history (present owner, site manager, and present tenants);
- Examining municipal or county planning files to check prior land usage and permits granted for the subject property;
- Conducting file searches with public agencies that have oversight relative to water quality and soil contamination issues (i.e., Washington State Department of Ecology [Ecology], state water board, fire department, etc.);
- Reviewing historical aerial photography of the subject property's vicinity;

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- Reviewing United States Geological Survey (USGS) maps;
- Completing the ASTM E2247 property owner questionnaire (Appendix E; E & E 2014).

The site reconnaissance was conducted on September 9, 2019. Mr. Bryon Alexander of E & E walked the subject property and observed current conditions and points of interest in the immediate vicinity, as identified during the records review of the property (EDR 2019a). Appendix A presents the photographic documentation.

The database search of federal and state standard environmental record sources was conducted prior to the site visit (EDR 2019a; Ecology 2019). The results of the database search are described in Section 3 of this Phase I ESA; the database radius report is available in Appendix B.

The findings, opinions, and conclusions reported herein are based on information collected from the records reviewed, observations and interviews made during the site visit, and information provided by the landowner and local officials.

1.3 Limitations and Assumptions

The subject property was observed during the site reconnaissance. Subsurface conditions were not investigated during this effort. E & E relied upon the environmental records reported by EDR to provide state and federal environmental records.

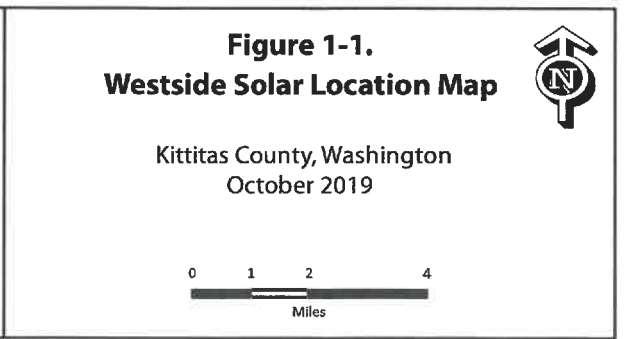
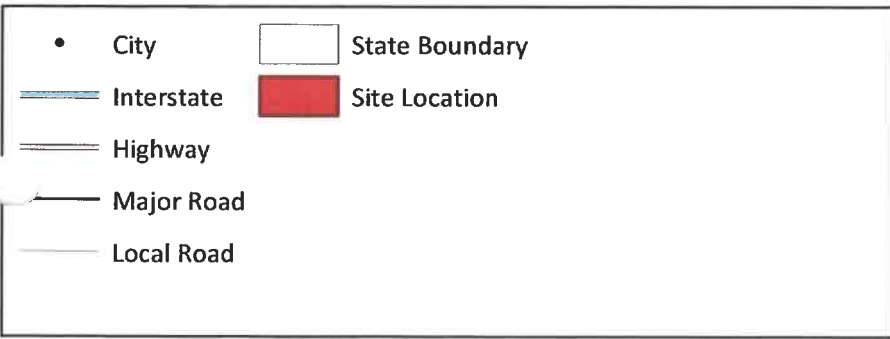
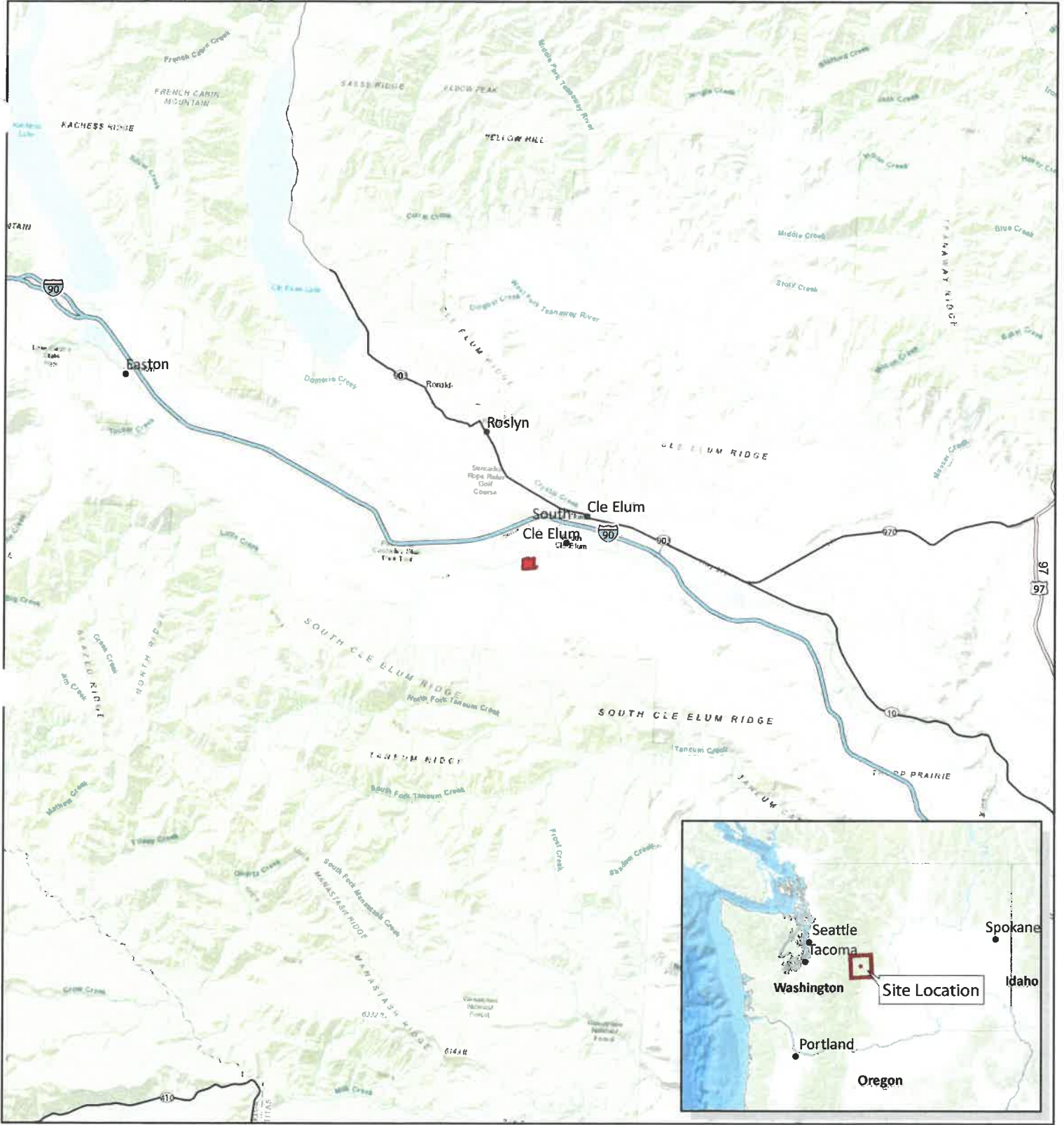
1.4 User Reliance

The information presented in this Phase I ESA report is based on site observations, data presented in the records reviewed, and interviews. This information was accepted as presented and was not independently verified.

This technical report is presented for the User, and Heelstone Development, LLC and Puget Sound Energy, the User's agents, successors, and assignees. Though legal and/or regulatory information may be contained herein, said information is not intended to constitute legal advice or opinion and, to the extent such legal advice or opinion is required, the User is advised to seek the advice of legal counsel. The findings contained herein are limited by the scope of the work specified in the report and the quality and type of information provided and/or made available to E & E for review and is subject to revision if additional or more definitive information becomes available.

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Figure 1-1 Westside Solar Location Map



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Figure 1-3 Westside Solar Project Detail





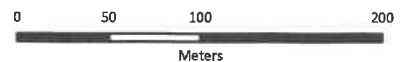
-  Parcel Boundary
-  Site Location

Figure 1-3.
Westside Solar Project Detail



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Figure 1-2 Westside Solar Aerial

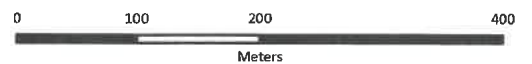


- Site Entrance
- Stream
- Site Location

Figure 1-2.
Westside Solar Aerial



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2 Site Review

2.1 Location and Legal Description

The subject property is located in Kittitas County, Washington at 47.175688° N, -120.970776° W (latitude, longitude), along Westside Road.

According to property conveyance records retrieved from the Kittitas County Assessors online database, the subject property is located at Westside Road, Cle Elum, Washington and consists of Kittitas County Tax Parcel Numbers: 19440, 19441, 19442, 10577, 10579 and 10580. The current owner of the subject property is the Dunn Family Corporation.

2.2 Subject Property and Vicinity General Characteristics

The subject property is located in a rural area of Kittitas County along Westside Road (Figure 1-1). The surrounding topography is undulating, and the greatest topographic relief occurs along the southern portion of the site near Westside Road where the elevation is 1,960 feet above mean sea level (AMSL). Within 1 mile of the subject property, the area is mixed residential and farmland. Area drainage typically flows southwest towards the Cle Elum River.

2.3 Current Use of the Subject Property

The subject property is currently vacant and is used for the storage of farming equipment. There is no indication of a business or other use of the property beyond agriculture.

2.4 Description of the Subject Property

The subject property is an approximately 46-acre tract of farmland and grazing land with a densely forested area that traverses the entire southern boundary (Appendix A, Photos 1–8). No structures were located on the property at the time of the assessment.

The topography of the site ranges from 1,938 feet AMSL to approximately 1,963 feet AMSL.

A quarry is located adjacent to the north of the subject property (Appendix A, Photo 12). Iron Horse Trail traverses the northern boundary of the subject property from east to west (Appendix A, Photo 14) along the boundary between the northern adjacent quarry. An approximately 5,000-gallon tanker truck for

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compressed gas of unknown contents with a placard marked “INERT” is located on the quarry property near the entrance. (Appendix A, Photo 12). The tank appeared to be in good condition with no evidence of corrosion. This is not considered a REC.

A pond is located adjacent to the northeast boundary of the subject property (Appendix A, Photo 15). No evidence of a sheen was observed on the surface of the pond.

Residential properties and farmsteads bound the property on the south, east, and west property boundaries (Appendix A, Photos 15–17) across Westside Road. Westside Road traverses the southern site boundary from east to west (Appendix A, Photo 11).

A drainage outfall associated with an offsite stormwater conveyance located on an adjoining farmstead to the south is located near the southwest corner of the subject property (Appendix A, Photo 10). No water was present during the visual inspection, and no staining was observed at the outfall.

A pond is located in the northwest portion of the site (Appendix A, Photos 7–8). No evidence of a sheen was observed on the surface of the pond. A culvert underlays Iron Horse Trail to the north and extends from the aforementioned pond to the northern adjoining property.

One pole-mounted transformer is located along the center of the southern boundary (Appendix A, Photo 9). The transformer appeared in good condition and no evidence of leaks were observed. This feature is not considered a REC.

An approximately 10-foot-long by 6-foot-wide shed is located on the southeastern portion of the property within a clearing. The shed is equipped with a lock and was not accessible during the site reconnaissance.

One tractor and an associated farming implement were observed to be stored near the northern tree line of the forested area located along the southern boundary (Appendix A, Photos 3 and 4). The farming equipment appeared to be in good condition and there was no evidence of staining or releases of mechanical fluids. This feature is not considered a REC.

There are two access points associated with the subject property. One access point is located near the center of the southern boundary and consists of a steeply graded driveway that leads from Westside Road, through the forested area and into the farm field area (Appendix A, Photo 2). The farming equipment is located within close proximity to this access point. The second access point is located near the center of the northern boundary and consists of a foot path that connects to the Iron Horse Trail.

A slightly overgrown mowed path was observed along the perimeter of the farm field area of the subject property. The path appeared to be maintained intermittently.

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During the site reconnaissance, there was no apparent visual evidence of the following on the subject property: vents or fill pipes indicating the presence of underground storage tanks; surface stains or corrosion; strong, pungent, or noxious odors; pools of unidentified liquid; sumps or clarifiers; open wells; pits; areas of stressed vegetation; or evidence of oil and gas wells.

2.5 Current Use of the Adjoining Properties

The subject property is bordered by Ellensburg Cement Milwaukee (quarry) across a multi-use path (Iron Horse Trail) to the north, a pond to the northeast, residential properties and farmsteads across Westside Road to the south, and farmsteads with graze land, agricultural land and wooded areas to the east and west.

Within the parameters of the records search and site reconnaissance, there was no apparent evidence of the following on the properties adjoining the subject property: vents or fill pipes indicating the presence of underground storage tanks; surface stains or corrosion; strong, pungent, or noxious odors; pools of unidentified liquid; sumps or clarifiers; open wells; evidence of fill materials; pits; areas of stressed vegetation; or evidence of oil and gas wells.

3 User Provided Information

3.1 Title Records, Environmental Liens, Activity, and Use Limitations

The User provided the subject property boundary, as shown on Figure 1-1.

A certified title search, inclusive of environmental liens and property-use limitation searches, was provided by the User. A copy of the certified title search is presented in Appendix G. According to planning sheets for the subject property, the northern adjoining railroad is listed as abandoned in 1995. The railroad is also listed as having a corridor approved for the installation of fiber optic cable. Utility easements for powerlines are shown along the northern, southern and western property boundaries. No findings related to environmental liens, use limitations or activities associated with hazardous materials and/or petroleum products were identified in connection with the subject property.

3.2 Specialized Knowledge of the Property

The User provided no extra, specialized information regarding the subject property.

3.3 Owner, Property Manager, and Occupant Information

According to property conveyance records obtained from the Kittitas County Assessors online database, the subject property is located at Westside Road, Cle Elum Washington and consists of Kittitas County Tax Parcel Number: 19440, 19441, 19442, 10577, 10579 and 10580. The current owner of the subject property is the Dunn Family Corporation.

3.4 Reason for Performing the Phase I ESA

This Phase I ESA was conducted by E & E for the User to identify RECs in anticipation of a potential purchase and/or development of the subject property.

3.5 Other Records

No other records regarding the subject property or adjoining properties were provided by the User to E & E.

4 Records Review

4.1 Standard Environmental Record Sources

4.1.1 Database Description

E & E retained EDR to perform a search of reasonably ascertainable government records. EDR conducted a site records search compliant with the requirements of ASTM E2247-16, which included searching a prescribed array of federal and state databases within a prescribed radius of the subject property. Appendix B contains the applicable references for the EDR report. EDR’s search of government records, dated September 10, 2019, identified no mapped sites on the property or adjacent property addresses. Table 4-1 provides minimum search distances. Appendix B presents the mapped database results.

Table 4-1 Search Distances

Database	Search Distance Radius (miles)
Federal Databases	
CERCLIS	0.50
NFRAP	0.50
NPL	1.00
NPL Delisted	1.00
ERNS	0.25
RCRA CORRACTS	1.00
RCRA-TSDF	0.50
RCRA-GEN	0.25
Federal IC/EC	0.50
Federal Brownfield	0.50
Washington State Databases	
ALLSITES	0.50
SWF	0.50
SHWS	1.00
LPST	0.50
UST	0.25
IC/EC	0.50
VCP	0.50
Dry Cleaners	0.25

Key:

CERCLIS = Comprehensive Environmental Response, Compensation, and Liability Information System
 CORRACTS = Corrective Action Sites
 ERNS = Emergency Response Notification System
 GEN = Generator
 IC/EC = Institutional Controls/Engineering Controls
 LPST = Leaking Petroleum Storage Tank

NFRAP = No Further Remedial Action Planned
 NPL = National Priorities List (also, Superfund)
 RCRA = Resource Conservation and Recovery Act
 SHWS = State Hazardous Waste Site
 SWF = Solid Waste Facility
 TSDF = Treatment, Storage, and Disposal Facility
 UST = Underground Storage Tank
 VCP = Voluntary Cleanup Program

4.1.2 Database Search Results

EDR's database search did not identify mapped sites on the subject property or on the adjacent properties (EDR 2019a). Available in Appendix B, the EDR radius report includes descriptions of the searched databases; an additional summary is presented below.

Federal Standard

- **Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS):** CERCLIS contains data on potentially hazardous waste sites that have been reported to the U.S. Environmental Protection Agency (USEPA) by states, municipalities, private companies, and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). CERCLIS contains sites that are either proposed to be or are on the National Priorities List (NPL; also known as "Superfund"), and sites that are in the screening and assessment phase for possible inclusion on the NPL. A review of the CERCLIS list, as provided by EDR, did not identify facilities within a 0.5-mile search distance radius.
- **CERCLIS – No Further Remedial Action Planned (NFRAP):** As of February 1995, CERCLIS sites with a designation of "NFRAP" have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or contamination was not serious enough to require federal Superfund action or NPL consideration. A review of the CERCLIS – NFRAP list, as provided by EDR, did not identify facilities within the 0.5-mile search radius.
- **NPL:** Also known as "Superfund," the NPL database is a subset of the CERCLIS and identifies over 1,200 sites nationwide for priority cleanup under the Superfund program. The USEPA is the source of this database. A review of the NPL listings, as provided by EDR, determined that there are no NPL listed facilities within the 1.0-mile search radius.
- **Delisted from NPL:** The National Oil and Hazardous Substance Pollution Contingency Plan (NCP) establishes the criteria that the USEPA uses to delete sites from the NPL. In accordance with 40 Code of Federal Regulations (CFR) 300.425 (e), sites may be deleted from the NPL where no further response is appropriate. A review of the database determined that there are no delisted NPL sites within the 1.0-mile search radius.

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- **Emergency Response Notification System (ERNS):** ERNS records and stores information on reported releases of oil and hazardous substances. USEPA is the source of this database. A review of the ERNS list, as provided by EDR, has determined that there are no ERNS records within the 0.25-mile search radius.

- **Resource Conservation and Recovery Act (RCRA) Info:** RCRAInfo is USEPA's comprehensive information system, providing access to data supporting the RCRA of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS). Information on RCRAInfo sites is provided by RCRA site type as follows:
 - **RCRA-Corrective Action Sites (CORRACTS):** CORRACTS lists the hazardous waste handlers with RCRA corrective action activity. A review of the CORRACTS list, as provided by EDR, did not identify facilities within the 1-mile search radius.

 - **RCRA-Treatment, Storage, and Disposal Facilities (TSDF):** This database includes selective information on sites that generate, transport, store, treat, and/or dispose of hazardous waste as defined by RCRA. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste. A review of the RCRAInfo database determined that there are no RCRA-TSDF sites within the 0.5-mile search radius.

 - **RCRA-Large Quantity Generator (LQG):** LQGs generate over 1,000 kilograms (kg) of hazardous waste or over 1 kg of acutely hazardous waste per month. A review of the RCRAInfo database did not identify RCRA-LQG sites located within the 0.25-mile search radius.

 - **RCRA-Small Quantity Generator (SQG):** SQGs generate between 100 kg and 1,000 kg of hazardous waste per month. A review of the RCRAInfo database determined that there are no RCRA-SQG sites located within the 0.25-mile search radius.

 - **RCRA-Conditionally Exempt Small Quantity Generator (CESQG):** CESQGs generate less than 100 kg of hazardous waste and less than 1 kg of acutely hazardous waste per month. A review of the RCRAInfo database did not identify RCRA-CESQG sites located within the 0.25-mile search radius.

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- **RCRA-Non-Generator (NonGen):** The database includes selective information on sites that generate, transport, store, treat and/or dispose of hazardous waste, as defined by RCRA. Non-Generators do not presently generate hazardous waste. No RCRA-NonGen sites were identified within the 0.25-mile search radius.
- **Federal Institutional Controls/Engineering Controls (IC/EC):** The IC/EC list sites that have either institutional controls or engineering controls. The contaminated media and the type of control implemented are also included in the data. A review of the federal IC/EC database determined that there are no IC/EC sites within the 0.50-mile search radius.
- **Federal Brownfields:** Included in the Brownfields sites listing maintained by the USEPA are Brownfields properties addressed by cooperative agreement recipients and Brownfields properties addressed by targeted Brownfields assessments. The USEPA's Targeted Brownfields Assessment (TBA) program is designed to help states, tribes, and municipalities—especially those without USEPA Brownfields Assessment Demonstration Pilots—minimize the uncertainties of contamination often associated with Brownfields. A review of the database determined that there were no TBA properties within the 0.50-mile search radius.

State Standard

- **Solid Waste Facilities (SWFs)/Landfill:** SWF-type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites. The review of the database determined that there were no SWFs within the 0.50-mile search radius.
- **State Hazardous Waste Site (SHWS):** SHWSs are the state equivalent of the federal CERCLIS sites. The review of the database determined that there are two SHWS sites located within the 1.0-mile search radius that may be of environmental concern to the subject property:
 - WA Parks South Cle Elum Dr. Depot, listed as being located 0.53-mile to the northeast of the subject property at 819 Milwaukee Road, is listed under the Ecology CSCSL database with a status of "Awaiting Cleanup" for the following contaminants: metals priority pollutants, petroleum products-unspecified and polycyclic aromatic hydrocarbons. Each of the contaminants listed are confirmed to be above cleanup action levels for soil. This site is also listed as a historic SQG

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of lead with no violations listed. Considering the lack of violations, distance, and that the site is down gradient from the subject property, this listing is not considered a REC.

- **Leaking Petroleum Storage Tank (LPST):** The LPST database is an inventory of reported LPST incidents. A review of the database revealed that there were no LPSTs within the 0.50-mile search radius.
- **UST:** The UST database contains registered USTs regulated under Subtitle I of the RCRA. A review of the database did not identify USTs within the 0.25-mile search radius of the subject property areas.
- **State IC/EC:** The IC/EC list sites that have either institutional controls or engineering controls. The contaminated media and the type of control implemented are also included in the data. A review of the Ecology IC/EC database determined that there are no IC/EC sites within the 0.50-mile search radius.
- **Voluntary Cleanup Program (VCP):** The VCP database lists sites involved in a voluntary remediation program. A review of the VCP database determined that there are no listed VCP sites within the 0.50-mile search radius.
- **Dry Cleaners:** Dry cleaner facility lists are derived from Ecology records. Historical dry cleaner site listings are based upon EDR's proprietary records. A review of the listings has determined that there are no current or historical dry cleaner sites mapped within the 0.25-mile search radius.
- **ALLSITES:** Information regarding facilities and sites of interest for Ecology. A review of the listings has determined the following two sites within the 0.50-mile search radius:
 - Ellensburg Cement Milwaukee, located adjacent to the north of the subject property at 2971 South Milwaukee, is listed as being under Ecology ALLSITES database under the Water Quality Program and as having a general permit for sand and gravel. No violations were listed for this site. This listing is not considered a REC.
 - PSE Cle Elum Substation, listed as being located 0.46-mile northeast of the subject property at 835 Garfield Avenue South, is listed under the Ecology ALLSITES database as a "HAZWASTE" site with a status of Tier 2. No other pertinent information was provided by the EDR Radius Report. Considering that the

distance of the site and that it is downgradient from the subject property, this listing is not considered a REC.

4.2 State Record Sources

4.2.1 Washington State Department of Ecology

E & E searched the Ecology online database regarding reported violations, hazardous substances, reported spills, and registered petroleum storage tanks (PSTs) or dry cleaners at the subject property. No information regarding the property was found in the database. The following sites were identified on the Ecology Website:

- Ellensburg Cement Milwaukee, located adjacent to the north of the subject property at 2971 South Milwaukee, is listed as being under the Ecology ALLSITES database under the Water Quality Program and as having a general permit for sand and gravel. No violations were listed for this site. This listing is not considered a REC.
- PSE Cle Elum Substation, listed as being located 0.46-mile northeast of the subject property at 835 Garfield Avenue South, is listed under the Ecology ALLSITES database as a “HAZWASTE” site with a status of Tier 2. No other pertinent information was provided by the EDR Radius Report. Considering that the distance of the site and that it is downgradient from the subject property, this listing is not considered a REC.
- WA Parks South Cle Elum Dr. Depot, listed as being located 0.53-mile to the northeast of the subject property at 819 Milwaukee Road, is listed under the Ecology CSCSL database with a status of “Awaiting Cleanup” for the following contaminants: metals priority pollutants, petroleum products-unspecified and polycyclic aromatic hydrocarbons. Each of the contaminants listed are confirmed to be above cleanup action levels for soil. This site is also listed as a historic SQG of lead with no violations listed. Considering the lack of violations, distance, and that the site is down gradient from the subject property, this listing is not considered a REC.

4.3 Physical Setting Sources

4.3.1 Topography

The subject property lies within the Cle Elum and Roland 7.5 and Cle Elum 15 series topographic quadrangles (EDR 2019c). The topography of the site ranges from 1938 feet AMSL to approximately 1963 feet AMSL.

4.3.2 Regional Geology and Hydrogeology

The subject property is located within the Upper Yakima River Watershed in Water Resource Inventory Area 39. The watershed includes the City of Cle Elum and additional townships in the surrounding area. The principle aquifer is listed as “other rocks” with no specific aquifer data (Ecology 2019). Area producing water wells are typically completed in the 80- to 250-foot in sandstone. Two water wells are listed as being located on the subject property. Two drinking water wells were identified on the Ecology database for water wells; however, these wells were not visually identified during the field reconnaissance.

4.3.3 Physical Setting Sources

The subject property area appears to be located in Major Land Resource Area (MLRA) 8B, as identified in the U.S. Department of Agriculture’s Natural Resources Conservation Service Handbook 296, *Land Resource Regions and Major Land Resource Areas of the United States, the Caribbean, and the Pacific Basin* (USDA NRCS 2006). Based on field observations and historical aerials, the property is vacant farmland with undulating topography. The subject property is currently vacant based on the site reconnaissance.

4.4 Historical Use Information on the Subject Property and Adjoining Properties

Based upon review of historical aerial photographs dated to 1952, as presented in Section 4.4.2, and topographic maps dated to 1952, as presented in Section 4.4.3, the subject property appears to have been used as farmland, grazing land, or forest land. The Kittitas County tax records presented in Section 4.4.1 supports this information.

4.4.1 County Records Review

A review of historical conveyance records of the Kittitas County tax records indicated the subject property was acquired by the Dunn Family Corporation in 1995. The online records do not present previous conveyance records. According to Ms. Cheryl Trimble, an owner of the subject property, the property has been vacant for several decades and has been primarily used for storing farm equipment. A summary of the property ownership records for the subject property is presented in Table 4-1.

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Table 4-1 Subject Property Ownership

Parcel Numbers	Property Address	Current Property Owner	Previous Use	Current Use	Acreage
10577	Westside Road	Dunn Family Corporation - (acquired in 1995)	Agricultural / Vacant	Agricultural / Vacant	8.94
10579					7.81
10580					3.02
19440					8.56
19441					9.12
19442					9.18

The property is located in a rural area, and there were no additional city or county planning records located for the property.

4.4.2 Historical Aerial Photograph Review

Available historical aerial photographs were reviewed (EDR 2019b). Table 4-2 summarizes the findings. Appendix C presents the historical aerial photographs. Topographic data were obtained from the current USGS 7.5-minute topographic maps (Figure 1-1) and historical USGS 15-minute and 7.5-minute topographic maps obtained from EDR showing the subject property and surrounding area. Appendix D presents the historical topographic maps.

Table 4-2 Review of Historical Aerial Photographs

Year	Subject Property and Vicinity	Adjacent Properties
1956-2017	The subject property appears to be undeveloped and does not contain structures. The area is forest land and farmland. A pond appears in the northwest corner of the subject property in 1998. One small structure appears along the southeastern portion of the site in 2013.	North: Quarry with a railroad traversing the southern boundary from east to west. Northeast: A pond is developed beginning in 1998. East: Farmstead with one structure along the eastern property boundary. South: Predominately farmland with some residential development. West: Farmstead with associated structures.

The aerial photographs show the subject property was previously undeveloped and is currently undeveloped farmland and grazing land with few residential properties in the area.

4.4.3 Historical Topographic Map Review

A current 7.5-minute topographic map is provided as Figure 1-1 of this report. Available historical topographic maps were obtained from EDR. Topographic maps for the years 1958, 1984, 2003, and 2014 were reviewed (Appendix D). A railroad is shown traversing the northern boundary of the subject property on the 1958 topographic map. The railroad is shown as a trail on subsequent topographic maps and listed as “Old RR Grade” on the 1984 topographic map, indicating that the railroad has been removed.

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Considering the potential for releases of hazardous materials and/or petroleum products from rail transportation activities, this finding is considered an area of environmental interest.

4.4.4 Sanborn Fire Insurance Map Review

Sanborn Fire Insurance maps were unavailable for the subject property and immediate vicinity. This is considered a data gap.

4.4.5 City Directory Review

City directories were unavailable for the subject property and immediate vicinity. This is considered a data gap.

4.4.6 Environmental Liens Records

The EDR database did not identify environmental liens filed on the subject property by the USEPA or by Ecology (EDR 2019a).

5 Site Reconnaissance

5.1 Site Observations

Site reconnaissance of the subject property was conducted by Mr. Bryon Alexander of E & E on September 11, 2019, to obtain information as to the likelihood of RECs being present on the property, as specified in ASTM E2247-16. The observations made during the site visit are presented in this section. Exteriors of adjacent properties, nearby areas of potential concern identified in state and local records, areas identified by local agency review and/or interviews, and areas identified as suspect during the database review (Appendix B) were also observed to the extent practical from the borders of the property and from public roads. Appendix A presents the photographically documented areas and specific site observations, as listed below. Appendix F presents a copy of the Field Logbook. The findings of the site reconnaissance are as follows:

- A quarry is located adjacent to the north of the subject property (Appendix A, Photo 12) An approximately 5,000-gallon tanker truck used to hold compressed gas of unknown contents with a placard marked “INERT” is located near on the quarry property near the entrance. (Appendix A, Photo 12). The tank appeared to be in good condition with no evidence of corrosion or leaks. This feature is not considered a REC.
- Iron Horse Trail bisects the northern adjacent property along the northern boundary of the subject property. A review of historic topographic maps revealed that the Iron Horse Trail was previously used as a railroad. The trail appears to be well maintained, and no staining or evidence of spills was observed. However, it is unknown what was historically carried along this trail when it was utilized as railway or how long the railway had been in service. Railways have the potential to have used hazardous substances and petroleum products, including those containing PCBs, heavy metals, solvents, and other chemicals for maintaining the railway access and vicinity, and creosote to maintain the former wood rail ties. The trail is considered an area of environmental interest.
- A pond is located adjacent to the northeast boundary of the subject property (Appendix A, Photo 15). No evidence of a sheen was observed on the surface of the pond.

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- Residential dwellings and farmsteads bound the property on the south, east and west property boundaries (Appendix A, Photos 15–17). Westside Road traverses the southern site boundary from east to west (Appendix A, Photo 11).
- A drainage outfall associated with an offsite stormwater conveyance located on an adjoining farmstead to the south is located near the southwest corner of the subject property (Appendix A, Photo 10). No water was present during the visual inspection, and no staining was observed at or near the outfall.
- A pond is located in the northwest portion of the site (Appendix A, Photos 7–8). No evidence of a sheen was observed on the surface of the pond.
- One pole-mounted transformer is located along the center of the southern boundary (Appendix A, Photo 9). The transformer appeared in good condition and no evidence of leaks were observed. This feature is not considered a REC.
- One tractor and associated farming equipment were observed to be stored near the northern boundary of the forested area located along the southern boundary (Appendix A, Photo 3 and 4). The farming equipment appeared to be in good condition and there was no evidence of staining or releases of mechanical fluids. This feature is not considered a REC.
- There are two access points associated with the subject property. One access point is located near the southwest corner of the site and consists of a steeply graded driveway that leads from Westside Road, through the forested area and into the farm field area (Appendix A, Photo 2). The farming equipment is located within close proximity to this access point to the northwest. The second access point is located near the center of the northern boundary and consists of a foot path that connects to the Iron Horse Trail. A slightly overgrown mowed path was observed along the perimeter of the farm field area of the subject property.

E & E did not observe evidence of the following on the subject property: corrosion; strong, pungent, or noxious odors; pools of unidentified liquids; sumps or clarifiers; open wells; pits; areas of stressed vegetation; or evidence of oil and gas wells. The subject property is currently vacant.

6 Interviews

6.1 Interview with Owner/Occupants and Site Manager

On October 7, 2019, E & E conducted interviews with Ms. Cheryl Trimble and Mr. Clinton Dunn, the subject property owners. The interviews with the subject property owners did not identify information related to spills and/or releases of hazardous materials or environmental cleanups at the subject property. Mr. Dunn informed E & E that the shed located on the southeast portion of the property contains no chemicals or hazardous materials and will be removed prior to the sale of the subject property. Appendix E presents a copy of the provided checklist and answers to the questionnaire.

6.2 Interviews with Adjoining Property Owners

Farmers and homeowners hold the adjoining properties. While E & E was on the subject property, the owners of these properties were unavailable. This is considered a data gap.

6.3 Interviews with Local Officials

On September 12, 2019, E & E contacted Kittitas Fire and Rescue for information regarding responses to fires, chemical spills, or other incidents at the subject property. A representative with Kittitas Fire and Rescue responded to the request and informed E & E that there was no pertinent information discovered.

6.4 Previous Environmental Reports

No previous environmental reports for the subject property were identified.

7 Data Gaps

ATSM E2247-16 requires that significant data gaps that affect the Environmental Professional's ability to identify RECs are reported. Data gaps concerning Environmental Liens and property use restrictions are of particular concern in that recorded environmental liens or limitations on the subject property would be dispositive on the matter of releases or threatened releases. However, all data gaps can be significant regarding the ability to identify conditions indicative of releases or threatened releases of hazardous substances due to the inconclusive nature of the information. Data gaps that were encountered during this Phase I ESA include the following:

- City directories were unavailable for the subject property and immediate vicinity.
- Sanborn Fire Insurance maps were unavailable for the subject property and immediate vicinity.
- Farmers and homeowners hold the adjoining properties. While E & E was on the subject property, the owners of these properties were unavailable.

8 Conclusions

In general conformance with the scope and limitations of ATSM E2247-16, E & E conducted this Phase I ESA for the Westside Solar site, located at 47.175688° N, -120.970776° W (latitude, longitude) in Kittitas County, Washington (subject property). Exceptions to, or deletions from, this practice are described in the respective sections of this report. Through this assessment, evidence of one area of environmental interest in connection with the subject property has been identified. Additionally, three data gaps preclude the Environmental Professional from determining whether additional RECs exist, as set forth below.

This assessment did not include:

- Collection, testing, or chemical analysis of samples of soil, groundwater, surface water, wastewater, building materials, or other materials that were or could have been on the subject property;
- Interviews, except as specifically noted in this report, with past owners, tenants, employees, or neighboring landowners regarding past site use, waste generation, and disposal practices (including disposal at remote sites), or manufacturing processes that may have contributed to environmental contamination at the subject property; and
- Evaluation of the potential risks associated with identified concerns from records searches with incomplete addresses, location listings, or sites where no records were available for review.

There was no evidence of commercial or industrial activity on the subject property. The field reconnaissance did not identify evidence of denuded vegetation or stained soils that may indicate the presence of contamination from such activity. The review of historic topographic mapping revealed one area of environmental interest as follows:

- Iron Horse Trail was formerly a railroad converted to a gravel trail. A review of historic topographic mapping shows Iron Horse Trail as a railroad in 1958 and converted to a trail in subsequent topographic mapping. The trail seemed to be well maintained and no staining or evidence of spills was observed. However, it is unknown what was historically carried along this trail when it was developed as railway or how long the railway had been in service. Railways have the potential to have used hazardous substances and petroleum products, including those containing PCBs, heavy metals, solvents, and other chemicals

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for maintaining the railway access and vicinity, and creosote to maintain the former wood rail ties.

Data gaps that prevented the Environmental Professional from determining whether additional RECs exist include the following:

- City directories were unavailable for the subject property and immediate vicinity.
- Sanborn Fire Insurance maps were unavailable for the subject property and immediate vicinity.
- Farmers and homeowners hold the adjoining properties. While E & E was on the subject property, the owners of these properties were unavailable.

9 References

- American Standards for Testing and Materials (ASTM). 2016. *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property*. American Standards for Testing and Materials Standard Designation E2247-16.
- Ecology and Environment, Inc. (E & E). 2014. Landowner Questionnaire, Compiled from ASTM E2247 by E & E. January 2014.
- Environmental Data Resources (EDR). 2019a. Radius Map Report. Inquiry Number: 5629079.1s. May 29, 2019. Conducted on Behalf of Ecology and Environment, Inc., Tallahassee, FL.
- _____. 2019b. Historical Aerial Photos. Inquiry Number: 5619146.6. May 29, 2019. Conducted on Behalf of Ecology and Environment, Inc., Tallahassee, FL.
- _____. 2019c. Historical Topo Map Report. Inquiry Number: 5619146.5. September 10, 2019. Conducted on Behalf of Ecology and Environment, Inc., Tallahassee, FL.
- Washington State Department of Ecology (Ecology). 2019. Online Data and Records. Accessed September 10, 2019 at: <http://ecology.wa.gov>
- United States Department of Agriculture, Natural Resources Conservation Service (USDA NRCS). 2006. *Land Resource Regions and Major Land Resource Areas of the United States, the Caribbean, and the Pacific Basin*. U.S. Department of Agriculture Handbook 296.

10 Signature and Qualifications of Environmental Professional Conducting Site Assessment

Mr. Bryon Alexander of E & E prepared this Phase I ESA report.

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



Bryon Alexander
Preparer

10/18/2019

Date