



MEMORANDUM

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA) REVIEW SUMMARY

March 19, 1997

PROPERTY NAME: Former Arizona State Elk's Association Hospital, unimproved 21.4 Acre Parcel

LOCATION: North side of Speedway Blvd. between Greasewood and Silverbell roads. Tucson, Pima County, Arizona.

ESA CONSULTANT: EnviroMD, Inc. 4400 East Broadway Blvd. Suite 300, Tucson, AZ. 85711,

I. **ESA COMPLETENESS:** The Phase I ESA is substantially complete, and was in compliance with standard industry practice at the time of the assessment (September 1993), and current standards.

II. **ESA EVALUATION:** Several environmental concerns were identified in the Phase I ESA. They included adjacent PCB suspect transformers, and historic mine tailings associated with an archaeological foundation.

III. **IMMEDIATE ON-SITE CONCERNS:**

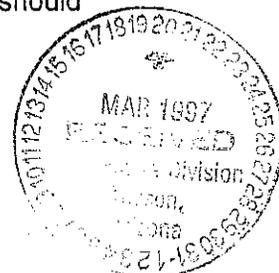
- None were identified.

IV. **SECONDARY ON-SITE CONCERNS:**

- Prior to the sale of this site by the City of Tucson, the Phase I ESA should be updated to verify current on-site conditions. The **off-site** adjacent pole-mounted electrical transformers were observed to be free of leaks or spills. No soil staining was observed beneath the transformers. The Transformers are owned by Tucson Electric Power. No additional assessment of these transformers is warranted at this time. The on-site mine tailings from historic (pre 1906) milling operations is an environmental issue of advanced age, (90+ years) and present only a **potential** environmental concern. Both of these concerns should be presented as disclosure items in the sales agreement, and assessed only as a negotiated request of potential purchasers.

(Note: If soil sample collection and analysis is required as part of a real estate transaction, a preliminary limited site assessment is estimated to cost from \$6,000 to \$10,000. If a preliminary assessment identifies soils that would require regulatory reporting and/or remediation, additional assessments (to establish horizontal and vertical extent of impacts) is estimated to cost \$12,000 to \$18,000. Any soil remediation costs would be speculative at this time.)

- Due to recent building and construction activities on adjacent properties, the subject site's property boundaries are not clearly identified, and access is difficult. Real Estate should have the property lines and access pathways identified through a survey.



If the updated Phase I identifies any new concerns, they should be addressed as a separate scope of work after the updated Phase I is complete.

Please refer to the September 1993 Phase I ESA document for specific details regarding the historic on-site conditions.

Please contact the City of Tucson, Office of Environmental Management at (520) 791-5414 with any questions or concerns.

Sincerely,

Office of Environmental Management,

A handwritten signature in black ink, appearing to read "Richard M. Byrd". The signature is fluid and cursive, with the first name being the most prominent.

Richard M. Byrd
Hydrologist II

cc: Environmental Review Committee
Benny Young, City Managers Office
Karen Masbruch, OEM
File



MEMORANDUM

Date: February 19, 1997

To: Karen Masbruch
Director
Office of Environmental Management

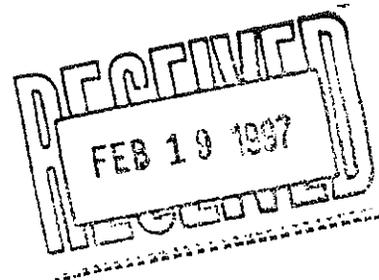

From: James Rossi
Property Agent
Real Estate Division

Subject: EnviroMD report dated 9/20/93 of a 21 acre City owned parcel @
La Cholla and Speedway

Attached is a copy of the subject report. Please provide this office with your opinion regarding this report, its recommendations and a cost estimate for any necessary testing. The subject property is proposed to be sold by the City and the cost of testing the site may be a critical part of the negotiation process.

Thank you for your assistance.

xc: Hector F. Martinez, Real Estate
Fiore Iannacone, Real Estate



EnviroMD



PHASE I ENVIRONMENTAL ASSESSMENT

21 Acre Site - North La Cholla and Speedway
Tucson, Arizona 85745

PO P51177

EnviroMD, Inc.
4400 East Broadway Blvd. Suite 300
Tucson, Arizona 85711

EMD #94-874

COMMITTED TO

PROTECTING

THE ENVIRONMENT,

YOUR HEALTH

AND SAFETY.



PHASE I ENVIRONMENTAL ASSESSMENT

**21 Acre Site - North La Cholla and Speedway
Tucson, Arizona 85745**

PO P51177

PREPARED BY

**EnviroMD, Inc.
4400 East Broadway Blvd. Suite 300
Tucson, Arizona 85711**

EMD #94-874

September 20, 1993

PREPARED FOR

**City of Tucson
Department of Transportation
Real Estate Division
201 N. Stone
Tucson, Arizona 85726**

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1.0 SCOPE OF WORK

1.1 PURPOSE. The purpose of this report is to describe the Phase I Environmental Assessment of the property known as 21 Acre Site , located at North La Cholla and Speedway Boulevard, Tucson, Arizona. This audit was conducted to identify (1) existing or potential environmental hazards and (2) potential resources with natural, cultural, recreational or scientific values of special significance i.e., "special resources for a subject property".

The audit was conducted through a physical survey of the property by the EnviroMD Audit Team and through interviews with private parties, regulatory agencies and others. Also, in the time allowed for this study, an intensive search was made for any available public records concerning the construction, use or past occupancy of the property.

1.2 CONTRACTUAL OBLIGATION. Through written agreement between the City of Tucson and EnviroMD, EnviroMD, Inc. agreed to provide a Phase I Environmental Assessment of the property described above.

Under RTC and FNMA (Fannie Mae) lending guidelines, Environmental Assessments (EAS) are divided into Phase I and Phase II studies. In Phase I studies, the history of a plot of land, building or other property is investigated for industrial and agricultural usage, ownership, and other factors which could have had a negative impact on the property due to the use of hazardous chemicals or other environmental concerns.

If the Phase I study indicates the potential for an environmental impact, then m o r e detailed investigation is performed in the Phase II study. These studies may involve more detailed historical investigation, analysis of soil, air and water samples and other studies as necessary to eliminate the concern for contamination or to determine the full extent of the contamination, if present, and its potential impact on the environment and human health.

The Phase I assessment conducted on the property described above is, therefore, a historical survey with limited site investigation as it did not involve sampling of the soil, air or water in the vicinity.

2.0 ASSET INFORMATION The subject property is a 21.4 acre vacant site located on the north side of Speedway Boulevard between Greasewood and Silverbell Roads, Tucson, Pima County, Arizona.

The City of Tucson Special Projects Coordinator and office responsible for the Asset is:

Mr. Fiore C. Iannacone, Special Projects Coordinator
City of Tucson
Department of Transportation
Real Estate Division
201 N. Stone
Tucson, Arizona 85726

3.0 SITE BACKGROUND

3.1 SITE LOCATION AND DESCRIPTION

3.1.1 LEGAL DESCRIPTION. The property is located on the north side of Speedway Boulevard, between Greasewood and Silverbell Roads, and is described as all that portion of the Southwest Quarter of the Southwest Quarter of Section 3, Township 14 South., Range 13 East, Tucson, Pima County, Arizona (Appendix C). The subject property is a 21.4 acres vacant site located on the west side of the Tucson Basin west of the Santa Cruz River.

3.1.2 TYPE OF PROPERTY AND CURRENT USE. The subject property is zoned R-1 by the City of Tucson for single family residential use. Schools, churches and public buildings are permitted with special authorization. The property consists of 21.4 acres of vacant land. The 1960 and 1980 aerial photographs, and current site photographs of the property are found in Appendix B. A Site Location Map is found in Appendix C.

According to a review of the chain of title, the property was purchased by the current owner, the City of Tucson, in 1906. The property had been transferred to Arizona State Elks Association Hospital from 1943 to 1969 (Appendix A). In 1969, the deed was transferred back to the City of Tucson. There are no building permits on record [15].

3.1.3 IMPROVEMENTS ON THE PROPERTY. No property improvements have been made. There are no utilities directly available to the site. However, there are electric, water and sewer lines along Speedway

Boulevard and Silverbell Road. Gas lines run along the east boundary and to the south of the property.

3.2 PROPERTIES SURROUNDING THE SITE. The areas surrounding the subject property are predominantly private and public owned land, and public roadways of the City of Tucson. Anklam Wash forms the northern property boundary, Camino Santiago the eastern boundary, frontage along Speedway Boulevard the southern boundary and the proposed extension of La Cholla Boulevard the western boundary. The surrounding land uses include a single family subdivision and elementary school to the north, an apartment complex (Loa Lomita) adjacent to the site on the south, and vacant land to the east and west.

Vacant desert lots, and additional single and multi-family residential properties define the broader surroundings. Pima Community College is within one mile to the southwest of the property. Northwest Park and El Rio Golf Course are less than one mile to the north and east respectively.

4.0 SITE HISTORY

4.1 APPROACH. It is EnviroMD's approach to investigate the historical use of the property by researching permitted activities which were or may have been conducted on this site and correlating these findings with regulations for various hazardous substances. Interviews held with owners, archaeologists and regulatory agencies provide additional information.

4.2 AERIAL PHOTOGRAPHY. In September of 1993, Ms. Sandi Nolan of EnviroMD visited the Cooper Aerial Survey company to review aerial photographs of the site. All photographs on file dating from the 1940s were reviewed. The photograph taken in 1960 shows the property to consist of unimproved desert (Appendix B). The photographs taken between 1960 and 1980 show no areas of new construction on the subject property. In the photograph taken in 1980, there is residential construction and a school located north of the property (Appendix B). This photograph also shows increased growth of vegetation in an approximate 250 foot by 400 foot area to the south of an old ore milling site. The only remarkable changes after 1980 are the Loa Lomita Apartments located along Speedway Boulevard to the southeast of the site.

A review of aerial photographs provided limited evidence that the subject property was ever used for handling large quantities of hazardous materials and that there was the appearance of contamination due to activities on the property or on surrounding properties.

4.3 RECORDS. A collation of the ownership history of the subject property is provided in Appendix A. According to the Tucson Building Safety Division and the County of Pima no permits have been issued for this property [15].

The chain of title shows three (3) changes in ownership (Appendix A). The first identified record was in 1906 when ownership was transferred from a private husband/wife party to the City of Tucson. In 1943, the property was transferred to Arizona State Elks Association and then, in 1969, back to the City of Tucson. Historical aerial photographs and building permit records indicate that the subject property remained undeveloped .

5.0 REGULATORY REVIEW.

5.1 AGENCIES AND REGULATIONS. Table I of Appendix F outlines hazardous substance regulations which are used as major avenues of research and reference in a project such as this property assessment. A brief overview of each regulation with site specific findings follows.

5.1.1 RCRA. In the State of Arizona, the Resource Conservation and Recovery Act (RCRA) is administered through the Arizona Department of Environmental Quality (ADEQ) according to a federal agreement granting state administration of the program. All generators, transporters, and disposers of hazardous waste must be registered through the ADEQ to engage in their respective activities. Additionally, permitted parties are subject to inspections by the ADEQ.

EnviroMD reviewed the RCRA Reporters List dated November 17, 1992. The RCRA Reporters data base obtained from ADEQ lists all generators of hazardous waste under the Resource Conservation and Recovery Act. No RCRA listing was noted for the subject property. However, there were six RCRA reporters within an approximate one mile radius. These include St. Mary's Hospital, ADOT Materials Testing Lab, Chevron Station #9-6231, Skyline Labs, Inc., Southwestern Radiation Oncology and St. Mary's Imaging Center (Table II, Appendix G). Only St. Mary's Hospital and ADOT Materials Testing Lab were listed as full quantity generators. The rest were small quantity generators. None were listed as permitted.

5.1.2 HSWA. The Hazardous and Solid Waste Amendments of 1984 (HSWA) is a federally authorized state program administered by the ADEQ. In addition to hazardous wastes, this act specifies requirements for solid waste management. Solid waste may refer to garbage, refuse, sewage sludge and other materials.

Our research indicates that there are no listed sites within one mile of the property. No further evaluation was possible of the effect that dump sites located within the Tucson Basin may have on local water quality or the health of nearby residents.

Wildcat trash dumping was noted on the subject property. No wildcat or other dumpsites within a one mile proximity to the site were noted in the available records [3,4]. Of the wildcat sites investigated in the county to date, most show evidence of disposal of hazardous materials. The impact of solid waste from any such unidentified sources on the subject property is unknown but presumed to be quite small.

The closed landfills and dump sites given in the Directory of Arizona Closed Solid Waste Landfills and Closed Solid Waste Dumps (February 1993), include no closed landfills within a one-half mile radius (Table III, Appendix G)[4].

- 5.1.3 CERCLA.** The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), known as the federal Superfund, is utilized to study and remediate released hazardous substances. The release may come from accidental or intentional spillage, leakage, or discharge.

The EnviroMD Audit Team reviewed the ADEQ's CERCLA Information and Data System (zipACIDS) List, dated December 30, 1992 [5]. This list identifies locations or facilities which are subject to investigation for possible contamination of soil, groundwater or surface water. Inclusion on the list does not necessarily indicate that a site is contaminated or in violation of regulatory statutes. The subject property was not on the CERCLA list. Four sites, ADOT Service Yard, Arizona Express, KR Acoustical Spraying and Strip Joint., are located within approximately one mile of the subject property (Table IV, Appendix G).

- 5.1.4 SARA.** The reauthorization of Superfund in the Superfund Amendments and Reauthorization Act (SARA) incorporated new features to guard against chemical disasters. Title III of the act contains a provision known as the "Emergency Planning and Community Right to Know Act, (EPCRA)". Under the provisions of this act, manufacturers must declare the amounts and locations of certain listed hazardous chemicals. EPCRA is administered by the states, and in Arizona it is overseen by the Arizona Emergency Response Commission (AERC). Local authority is maintained by Tucson-Pima County, Mr. Mike Walsh, Office of Emergency Services Coordinator. All parties who report under EPCRA must file reports with the state office, the local office, and the nearest fire district. Many manufacturers found on the EPCRA listings are duplicated on the RCRA listing.

EnviroMD reviewed the AERC list of Sara Title III reporters dated April 20, 1993. The subject property was not listed in this database. There were six reporters within a one mile radius of the subject property (Table V, Appendix G) and include Whiting Station #159U, Pima County Wastewater Management, Chevron Service Station #9-6231, 7-11 Store #20196, Sonotronics and Conway Western Express. Four of these reported gasoline and, or diesel fuel chemicals. Pima County Wastewater is listed for chlorine.

- 5.1.5 TSCA.** The Toxic Substances Control Act (TSCA) regulates certain toxic substances, most notably, asbestos and polychlorinated biphenyls (PCBs). Regulatory requirements for lead-based paint and radon have recently been added to TSCA. This act is administered from the EPA Region IX office

in San Francisco, California, and locally by the Arizona Department of Environmental Quality. Findings specific to the subject property are addressed in Section 6.

5.1.6 FIFRA. The Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) is administered by the EPA on the federal level and by the Arizona Commission of Agriculture and Horticulture, the State Chemist, the Occupational Safety and Health Division of the Arizona Industrial Commission and the Arizona Department of Environmental Quality on the state level.

Collectively, all of these federal and local entities exercise regulatory authority over the registration, sale, shipment, transportation, delivery, application and use of pesticides.

Historic aerial photographs do not show any past use of the site for agricultural purposes (Appendix B).

5.1.7 WQARF. Due to serious problems with the Federal Superfund Program, such as extensive delays and funding concern, Arizona enacted it's own Superfund program through the Environmental Quality Act of 1986. One of the major components of this legislation was the Water Quality Assurance Revolving Fund (WQARF). This state superfund established a trust to be used in identifying, studying and mitigating potential hazardous waste sites in Arizona.

EMD personnel reviewed ADEQs Superfund and WQARF Site Information Package for the 1992-1993 fiscal year. The Tucson area has five current WQARF sites and one Superfund site [1]. The subject property is not located within one mile of the site investigations currently underway. The closest WQARF study area is the Miracle Mile area located between Wetmore Road on the north, Fairview Road on the east, Grant Road on the south and Silverbell Road on the west (Appendix F).

5.1.8 UNDERGROUND STORAGE TANKS (USTs). In surveys conducted by the EPA, up to thirty percent of existing USTs are leaking, ninety percent of the leaks are caused by corrosion and more than fifty percent originate in the piping associated with the tanks. The Code of Federal Regulations established requirements for leak detection, leak prevention, corrective action and financial responsibility for all USTs containing regulated substances. UST owners and buyers and sellers of real

properties must take steps to protect themselves from the liabilities and financial requirements mandated by federal, state and local regulatory agencies. Numerous examples exist where leaking USTs have been discovered and the current property owner, whether owner of the tank(s) or not, has paid for costly cleanups.

The Underground Storage Tank (UST) compliance division of ADEQ maintains a listing of registered USTs. According to the ADEQ UST listing dated January, 1993, no USTs were listed for the subject property [6]. There were no USTs listed for locations within an approximate one-half mile radius (Table VI, Appendix G).

ADEQ also maintains a listing of Leaking USTs (LUSTs). This list, dated January 13, 1993, indicates that there are no LUSTs on the subject property or within an approximate one-half mile radius of the subject property (Table VII of Appendix G) [7].

6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS

6.1 APPROACH. EnviroMD's approach to site surveys is to investigate the buildings and properties by walkthrough surveys and by reviewing historical aerial photos. The aerial photos allow us to compare suspected areas of contamination on the ground with past photographic information to determine if the suspect area is natural or human-made. During the walkthrough, RTC, Fannie Mae Phase I guidelines as well as proprietary EnviroMD checklists to characterize the site were used to insure that all appropriate environmental issues were addressed.

6.2 WALKTHROUGH. On September 13, 1993, Ms. Julia Rosen and Ms. Gloria Browne of EnviroMD conducted the site walkthrough of the property together with a representative from the City of Tucson, Mr. James Rossi. The site reconnaissance included notation of surrounding properties, structures on the property, disposal of hazardous materials, fauna, flora and topography. The maintenance on the property was satisfactory, although there was evidence of limited wildcat dumping and transient activity.

There was an ore mill and homestead located north of the project area on the south bank of the Anklam Wash. According to an archaeological survey conducted in August of 1993 by Desert Archaeology, Inc., these features predate the year 1906 (Appendix E). Within the property boundaries, there were two cement slabs connected by graded dirt road which lead to a dropoff. To the west of the dropoff area, there was the remains of the base of a water tank. The ore mill was located to the south of the tank and consisted of several

cement structures. Photographs of these features are in Appendix B .

6.3 TOPOGRAPHY. The property is located in an area with much topographic relief (Appendix C). The elevation in the immediate area is approximately 2,370 feet above mean sea level (msl) [22]. The property is bounded by Anklam Wash on the north and accessed via a dirt road extending from Speedway Boulevard. Several dirt roads have been constructed on the site. The area in the immediate vicinity of the property is characterized by the wash, and residential and undeveloped lots with similar topography.

6.4 SOILS. This area is characterized as mountainous and bedrock [18]. Soils in the area of the subject property are generally described as containing 60 to 80 percent silt and clay [18]. Areas which appear to contain tailings from a former ore milling operation were observed adjacent to the subject property in the vicinity of an ore mill located at the north boundary of the project area. There were two additional locations containing suspected tailings within 25 feet on the west and 50 feet on the east of the milling operation. All suspected tailings areas were less than 15 feet in diameter.

6.5 GEOLOGY. As described in the Pima Association of Governments report, the subsurface geology of the Tucson Sub-Basin within the Upper Santa Cruz Basin is comprised of alluvial and basin-fill deposits. These alluvial deposits have been further sub-divided into the following units in ascending order. The Pantano-Formation (Oligocene), Tinaja Beds (Miocene and Pliocene), the Fort Lowell Formation (Pleistocene), and more recent surface deposits. The subject area is Precambrian to Tertiary containing volcanic rocks and undifferentiated deposits: flows, necks, dikes and plugs; tuff, welded tuff, agglomerate, and breccia, basaltic, andesite to rhyolite; and interbedded conglomerate, sandstone and siltstone [18].

6.6 HYDROLOGY

6.6.1 GROUNDWATER HYDROLOGY. As described in the Pima Association of Governments report Metropolitan Tucson Basin Water Quality and Pollution source Assessment, March 1989 [18], groundwater flow in the Tucson basin is generally northwestward from the southern and southeastern boundaries of the basin, westward from the Tanque Verde mountains, southwestward from the Santa Catalinas and southwestward along the Canada Del Oro. Overall, the groundwater flow in the region is northwestward along the Santa Cruz drainage.

The groundwater source in the subject property area is the Fort Lowell/Upper Tinaja Beds Aquifer. Depth to water for wells in the immediate area of the property is approximately 124 feet below the surface [16]. Depth to water in surrounding areas has changed from 175 to 240

feet below the surface from 1960 to 1980 [16]. The water table elevation for the subject property is approximately 2310 feet above mean sea level [16].

6.6.2 SURFACE HYDROLOGY. According to the aerial photography review, there has not been significant historical surface water flow across the property, nor is there evidence of on-site migration of contaminants.

The U.S.G.S Quadrangle map of the area shows Anklam Wash, a xero-riparian zone, approximately 100 feet to the north of the property, running in a northwesterly direction [22]. The property lies approximately 1.5 miles west of the Santa Cruz River, which shows ephemeral flow.

6.7 CHEMICALS AND RAW MATERIALS. No chemical products were observed during site reconnaissance. Potential sources of chemical contamination include the sections of the milling operation that contain tailings. An archaeological survey, conducted by Desert Archaeology, Inc. for the City of Tucson in August of 1993, suggests that the milling operation predates 1906 (Appendix E).

Research conducted by EnviroMD indicates that prior to 1909 predominantly copper ore was milled in Pima County using a cyanide process [17]. Waste rock and tailings may contain sulfides which on subsequent weathering are oxidized and result in acid drainage. The estimated age of operation for the ore mill and size of the tailing deposits minimize this potential for environmental pollution.

6.8 POLYCHLORINATED BIPHENYLS (PCBs). Transformers and other electrical equipment which contain PCBs are required to be documented under a PCB maintenance program. Such a program requires:

- Testing of transformers for PCB content
- Labeling of transformers after testing
- Inspection of transformers at quarterly intervals to spot leakage, proper function
- Quarterly and annual reports
- Notification of fire service personnel in district
- Proper storage and disposal of waste PCB transformers

There are two pole mounted electrical transformers adjacent to the northeast property boundary, near the gas line (see Site Map, Appendix C). There were no identification numbers or labelling on the transformers. No evidence of soil staining or leakage from the transformers was noted during site reconnaissance.

6.9 ASBESTOS CONTAINING MATERIALS Title II of TSCA includes the Asbestos Hazard Emergency Response Act (AHERA) which requires inspection and management of asbestos containing building materials in school buildings. Although not strictly applicable to non-school buildings, with the exception of training requirements, many other AHERA provisions have been adopted by industry as state of the art practices for non-school buildings as well.

No asbestos inspection was required for the subject property since there were no potential sources of asbestos.

6.10 RADON. A state-wide radon survey was conducted in 1988 by the Arizona Radiation Regulatory Agency (ARRA) and the U.S. Environmental Protection Agency. Radon levels for 13 Tucson homes within the 85745 zipcode which includes the subject property ranged from less than 0.5 to 1.5 picoCuries/liter (pCi/L) and averaged 0.9 pCi/L (standard deviation = 0.4 pCi/L) [10]. These levels were measured using the activated charcoal canister collection method for a 48 hour period. A subsequent Phase II radon study was not conducted for this area. All measured levels for the subject area zipcode are below the EPA radon guideline of 4.0 pCi/L.

6.11 LEAD- BASED PAINT (LBP). Lead-based paints were widely used until the late 1970's when their use in building interiors was banned to combat childhood blood lead poisoning. There were no sources of lead-based paint on the subject property.

6.12 LEAD IN DRINKING WATER. Water to the site would be provided by Tucson Water, a public water utility and full participant in regular lead testing as required under the Safe Drinking Water Act. Additional sampling for the subject site is not recommended.

6.13 HAZARDOUS SUBSTANCES. With the exception of potential contaminants from the milling operation present in tailings, there was no indication of significant use of hazardous materials on the subject property. Use of hazardous substances was reported on adjacent properties (Tables II, IV and V, Appendix G). Since aerial photographs do not show any agricultural activity since 1960, pesticide use is not indicated. The wildcat dumping observed during the reconnaissance consisted of glass bottles, cans and other non-hazardous trash.

6.14 LANDFILLS. No landfills were observed on the subject property nor reported within a one-half mile radius (Table III, Appendix G).

6.15 PITS, SUMPS, DRYWELLS, AND CATCHBASINS. No pits, sumps drywells or catchbasins were observed on the subject property.

6.16 ON-SITE STORAGE ABOVE AND UNDERGROUND STORAGE TANKS. According to ADEQ UST Lists (January, 1993), permit records research, aerial photography, and visual confirmation during the site walkthrough, it does not appear that there exists or have existed any USTs on the property. Likewise, no intact above ground storage tanks were observed.

6.17 OFF-SITE STORAGE TANKS No offsite storage tanks were noted nor expected given current residential property use.

6.18 STORM WATER DRAINAGE There is no permanent surface water storage located at the subject property. Surface run-off is directed along the north in a drainage way which runs in an east-west direction.

7.0 SITE INVESTIGATION AND REVIEW OF SPECIAL RESOURCES

7.1 APPROACH. EnviroMD combines interview and literature review techniques to assess the special resources present on or near the subject property. Key agencies include: The Arizona State Museum and Arizona State Historical Museum, the U.S. Geological Survey, and the City of Tucson.

7.2 BIOTA, ENDANGERED SPECIES

7.2.1 FLORA. The subject property is situated in an area of low density residential activity. Native vegetation on the subject property consisted of triangle leaf bursage, creosote bush, and desert grass. Isolated areas of pencil cholla, barrel cactus, prickly pear cactus, saguaro cactus, ocotillo, paloverde and mesquite were also observed. One grouping of night blooming cereus was also noted.

7.2.2 FAUNA. Some small population of mammals and reptiles undoubtedly live on the property. None were observed during the site reconnaissance. Species of mammals and reptiles may travel through the property from Anklam Wash.

7.3 WETLANDS. The Emergency Wetlands Resources Act of 1986 contains provisions for the protection and restoration of the nations's wetlands. According to Arizona Fish and Game Department maps, the subject property is not in the proximity of a federal or state designated wetland [9]. Site and aerial photo reconnaissance confirm the absence of surface waters on or in the vicinity of the subject property. Anklam Wash, a xero-riparian corridor, lies approximately 100 feet north of the property, and the Santa Cruz River lies approximately 1.5 miles to the west.

7.4 COVERED PROPERTY - ZONING RESTRICTIONS. Neither the property nor adjoining properties are part of the Coastal Barrier Resource System.

A Scenic Corridor Zone (SCZ) is located along Speedway Boulevard between Silverbell and Greasewood Roads [12]. The subject property is located farther than 400 feet from Speedway Boulevard. Therefore, SCZ restrictions do not apply.

The purpose of the Hillside Development restrictions is to preserve Tucson's mountains and foothills and reduce hazards associated with unstable rock and soils. Any development in these areas should use construction methods which ensure slope stabilization and minimize soil erosion [13]. The subject property is located in a Hillside Development Zone (HDZ) (Appendix H).

An Environmental Resource Zone (ERZ) is included in the subject property (Appendix G). This regulation relates to areas associated with Tucson's public lands and preserves including Tucson Mountain Park and provides for the protection of valuable habitat resources. Included in this sensitive zone is the critical riparian habitat along the Anklam Wash. However, according to City of Tucson zoning exceptions, the ERZ regulations do not apply to an area which is also subject to HDZ regulations as long as there is no encroachment into the 100-year floodplain [14].

7.5 FLOODPLAINS, WILD & SCENIC RIVERS. The subject property is directly south of the Anklam Wash which is in Zone A, according to the Federal Emergency Management Agency (FEMA) and the City of Tucson [21]. Zone A is defined as an area within the special flood hazard area inundated by 100-year floodplain. No water-surface elevation of the base flood has been determined for Zone A.

The Santa Cruz River where flow is ephemeral is classified as a regional watercourse and located approximately 1.5 miles east of the property.

7.6 SCIENTIFIC SIGNIFICANCE. No areas of scientific interest were identified for the subject property as a result of aerial photograph and U.S.G.S. map review, and site reconnaissance.

7.7 WILDERNESS AREAS. According to a review of City of Tucson maps, the subject property is included in the Environmental Resource Zone (Appendix H) [14].

7.8 NATURAL LANDMARKS. The City of Tucson Historic District and Landmark Overlay Maps were reviewed to determine the presence of listed or proposed sites on or near the subject property. No landmarks nor historic sites were listed for the subject property, nor for adjacent land parcels [11].

7.9 SOLE SOURCE AQUIFERS. Due to the ephemeral flow of the Santa Cruz River, groundwater has been the only reliable water source for the Tucson Basin. However, the activation of the Central Arizona Project (CAP) has resulted in the delivery of drinking water from the Colorado River water to a number of areas in Tucson and Pima County. According to Tucson Water sources, the subject property is scheduled to receive CAP water within one year [20].

There are no portions of the property, nor features affecting recharge of the existing aquifer (i.e. springs, wetlands, etc.).

7.10 HISTORIC PROPERTY An archaeological file check for a radius of one mile around the property was conducted by Miss Sharon F. Urban, Public Archaeologist for the Arizona State Museum. Ample evidence exists that many areas within an area of one mile surrounding the subject property have significant archeological importance from a history of occupation by native Indian populations over centuries and from historic Spanish, Colonial and more recent anglo occupations.

In her letter, Miss Urban indicates that Section 3 in the SW 1/4 contains sites AZ AA:16:333, 335 and 376. There are two sites in the NW 1/4: AZ AA:16:29 and 334. Sites AZ BB:13:84 and 85 are located in the northeast quarter. There are no known sites for Sec 4 and only one site, AZ AA:16:188, in Sec 9. In Sec 10 there are sites AZ AA:16:6, 26, 36 and 332, and AZ BB:13:121. She recommends that an archaeological survey be conducted on this property prior to any ground modification (Appendix E).

In an archaeological survey conducted by Desert Archaeology, Inc. in 1993, recommendations for archival research and significance assessments prior to sale of the subject property were made (Appendix E). This was based on the unknown significance of a pit, cement pads and an isolated foundation found within the subject area. Of concern was a site, AZ AA:16:376, located outside the northern boundary of the property. This site includes an ore mill and homestead which predate 1906 and may be eligible for inclusion in the National Register of Historic Places under Criterion D (36 CFR 1202). Since this site is not located on the subject property and artifacts found during the survey are not believed to be significant, archaeological clearance for the area outside AZ AA:16:376 site boundaries was recommended by Desert Archaeology, Inc..

7.11 RECREATIONAL AREAS. The City of Tucson, Year 2000 Recreational Planning Report Park and Facilities Plan (1989) was reviewed to determine the proximity of recreational areas to the subject property (Appendix H). The subject property has not been designated for acquisition for recreational purposes. Two City of Tucson parks lie to the east within a one mile radius of the subject property: Northwest Park and El Rio Golf Course.

7.12 COASTAL ZONES. The subject property lies in the Sonoran Desert, a landlocked area remote from the any coastal zone.

8.0 SUMMARY AND RECOMMENDATIONS

8.1 DISCUSSION OF FINDINGS. As a result of our Phase I investigation, EnviroMD finds that there is no evidence of significant use or disposal of hazardous materials on the subject property. There is evidence of potential contamination on adjacent properties. There are six RCRA reporters listed within one mile, four CERCLA listings within one mile and six SARA Title III reporters within one mile. No USTs, Leaking USTs, nor landfill listings were noted for the subject or adjacent properties.

It is unknown whether two pole mounted transformers, owned by Tucson Electric Power, located adjacent to the subject property have been tested for PCBs, and therefore must be considered to be PCB-containing until testing results demonstrate otherwise.

Existing radon data for the area do not suggest elevated levels for the subject property. Supplementary radon testing is not recommended at this time.

There is no potential for the presence of lead-based paint.

Special resource items are of significance. The subject property is included in a Hillside Development Zone. It is also included as an Environmental Resource Zone. There is property of potential historical significance adjacent to the subject property to the north. This has been identified as an ore milling site and homestead predating 1906. There may be an extension of the milling operation into the subject property.

8.2 LIMITATIONS TO THE ASSESSMENT. The purpose of this Phase I Environmental Assessment is to determine if hazardous substances were used on the property in the past, or are currently in use, by performing interviews, records research and site reconnaissance. Accordingly, hazardous substances which are not visibly apparent, those which were potentially discharged without the knowledge of the current or previous owners and those substances which are not currently defined as "hazardous" are beyond the scope of this investigation. This study is limited by time, financial considerations and practical (i.e. non-destructive and reasonable) reconnaissance methods.

EnviroMD, Inc., its employees and sub-contractors used all reasonable care to diligently assess the potential for hazardous substances on this property. However, the absence of hazardous substance(s) being found in this assessment does not constitute a guarantee from EnviroMD that no hazardous substances are present nor does the discovery of some hazardous substance imply that all potentially hazardous substances have been found.

8.3 AREAS OF CONCERN Environmental concerns with respect to the property at Speedway Boulevard between Silverbell and Greasewood Roads include:

- 1) untested electrical transformers, which may contain PCBs on adjacent property and
- 2) tailings which may contain contaminants from milling operations on adjacent property.

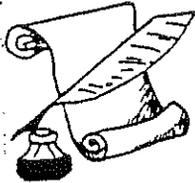
8.3.1 ACTUAL OR POTENTIAL AREAS OF NON-COMPLIANCE. No areas of environmental regulatory non-compliance were identified for the subject property in this study.

8.4 RECOMMENDATIONS FOR FURTHER INVESTIGATION AND REGULATORY REPORTING. EnviroMD suggests that limited Phase II sampling of surface soil be conducted in adjacent tailings areas to determine whether there is metal contamination from the milling operation. Screening methods should be used in the sample analyses as a cost savings measure. ESA Laboratories, Inc. (Bedford, Massachusetts) provides RCRA 8 (Ag, As, Ba, Cd, Cr, Hg, Pb, Se) screening for a total cost of \$165.00 per sample; and soil ph for a total of \$10.00 - \$20.00 per sample. PCB testing of the two existing pole mounted transformer oils is available from Tucson Electric Power for total cost of \$100 for sampling and analysis. Testing is the only definitive means of determining PCB-oil status, although no leakage was evident during site reconnaissance, which reduces any urgency for such testing.

9.0 PHASE I ENVIRONMENTAL AUDIT TEAM. The EnviroMD Audit team was comprised of Ms. Gloria J. Browne, M.S., Ms. Julia C. Rosen, M.Sc., Ms. Sandi Nolan and Ms. Tiffany Franklin. Ms. Browne and Ms. Rosen, industrial hygienists, conducted site reconnaissance. Ms. Browne served as project manager for the Phase I Environmental Assessment. Ms. Sandi Nolan and Ms. Tiffany Franklin provided research support for historical and environmental records. All Lands Title, a subcontractor to EnviroMD, provided the chain of title report.

APPENDIX A

Chain of Title Documentation



ALL LANDS TITLE

P.O. Box 11644 • Phoenix, Arizona 85061
(602) 242-7921 • Fax (602) 242-4493

50 YEAR CHAIN OF TITLE REPORT WITH LEASES

YOUR FILE NO:

FILE NO: 93-589

DATE: September 7, 1993

ALL LANDS TITLE hereby reports a 50 year chain of title to the land described below, subject to the leases as shown in Schedule B. This is a report of chain of title with leases ONLY and is neither a guarantee of title, a commitment to insure or a policy of title insurance. The total liability is limited to the fee paid for this report.

1. Title to the estate of interest covered by this report is vested in: THE CITY OF TUCSON, A MUNICIPAL CORPORATION
2. By virtue of that certain see chain of title attached.
3. The land referred to in this report is located in Pima County, Arizona, described as follows:

Assessor's No.: 115-21-009

SEE LEGAL DESCRIPTION ATTACHED

SCHEDULE B

No leases were found of record

50 YEAR CHAIN OF TITLE

1. Deed from Hugo Seaberg and Lottie V. Seaberg, his wife to the city of Tucson, a municipal corporation dated 1-24-06, recorded 3-3-06 in Book 39 of Deeds, page 291. (all)
2. Deed from the city of Tucson, a municipal corporation to Arizona State Elks Association Hospital dated 5-1-43, recorded 5-6-43 in Book 254 of Deeds, page 527. (portion)
3. Deed form Arizona State Elks Association Hospital, a corporation to the city of Tucson, a municipal corporation dated 6-9-64, recorded 7-1-64 in Docket 2287, page 294 and recorded 7-29-69 in Docket 3547, page 457.

TRW·REDI
115-21-002A

Nationwide 1-800-345-7334

TRW·REDI
115-21-0860

TAX PARCEL	PROPERTY ADDRESS	OWNER MAILING ADDRESS	PHONE	REC-DATE	LEGAL	DKT-PG	DESCRIPTION	POOL	HEATING	SOL	A/C	REFRIG	EXTERIOR WALL	ROOF	ASBESTOS	CLASS	CONDITION	TOTAL FCV	LAND-FCV	IMPR-FCV	EA	TOTAL LIM
115-21-003A	1635 N SILVERBELL RD TUCSON	1635 N SILVERBELL RD TUCSON AZ 85705																\$41,875	\$9,500	\$32,375		\$41,875
CLASS	R3																	\$40,563	\$9,500	\$31,063		\$40,563
115-21-0070	1455 N SILVERBELL RD SU 2 TUCSON AZ 85745	1455 N SILVERBELL RD SU 2 TUCSON AZ 85745																\$35,200	\$16,071	\$19,129		\$35,200
CLASS	R3																	\$35,200	\$16,071	\$19,129		\$35,200
115-21-008A	1477 N SILVERBELL RD TUCSON AZ 85705	1477 N SILVERBELL RD TUCSON AZ 85705																\$23,799	\$650	\$23,149		\$23,799
CLASS	R3																	\$23,799	\$650	\$23,149		\$23,799
115-21-0090	SILVERBELL GRACE BRETHREN CHURCH	SILVERBELL GRACE BRETHREN CHURCH																\$660,173	\$659,540	\$61,633		\$660,173
CLASS	R3																	\$660,173	\$659,540	\$61,633		\$660,173
115-21-010C	6300 E EL DORADO PLAZA #100 TUCSON AZ 85715	6300 E EL DORADO PLAZA #100 TUCSON AZ 85715																\$2,508,000	\$186,795	\$2,321,205		\$2,508,000
CLASS	R3																	\$2,508,000	\$186,795	\$2,321,205		\$2,508,000

TRW·REDI
115-21-010C

Nationwide 1-800-345-7334

TRW·REDI
115-21-0910

TAX PARCEL	PROPERTY ADDRESS	OWNER MAILING ADDRESS	PHONE	REC-DATE	LEGAL	DKT-PG	DESCRIPTION	POOL	HEATING	SOL	A/C	REFRIG	EXTERIOR WALL	ROOF	ASBESTOS	CLASS	CONDITION	TOTAL FCV	LAND-FCV	IMPR-FCV	EA	TOTAL LIM
115-21-0910	1630 N MONROE CRESCENT TUCSON	1630 N MONROE CRESCENT TUCSON																\$202,509	\$24,105	\$178,404		\$202,509
CLASS	R3																	\$202,509	\$24,105	\$178,404		\$202,509

TRW·REDI
115-21-0910

TAX PARCEL	PROPERTY ADDRESS	OWNER MAILING ADDRESS	PHONE	REC-DATE	LEGAL	DKT-PG	DESCRIPTION	POOL	HEATING	SOL	A/C	REFRIG	EXTERIOR WALL	ROOF	ASBESTOS	CLASS	CONDITION	TOTAL FCV	LAND-FCV	IMPR-FCV	EA	TOTAL LIM
115-21-0860	1611 N SADDLEBACK LANE TUCSON	1611 N SADDLEBACK LANE TUCSON																\$28,019	\$48,019	\$28,019		\$28,019
CLASS	R3																	\$28,019	\$48,019	\$28,019		\$28,019
115-21-0870	1601 N SADDLEBACK LANE TUCSON	1601 N SADDLEBACK LANE TUCSON																\$35,200	\$16,071	\$19,129		\$35,200
CLASS	R3																	\$35,200	\$16,071	\$19,129		\$35,200
115-21-0880	1602 N MONROE CRESCENT TUCSON	1602 N MONROE CRESCENT TUCSON																\$23,799	\$650	\$23,149		\$23,799
CLASS	R3																	\$23,799	\$650	\$23,149		\$23,799
115-21-0890	1610 N MONROE CRESCENT TUCSON	1610 N MONROE CRESCENT TUCSON																\$660,173	\$659,540	\$61,633		\$660,173
CLASS	R3																	\$660,173	\$659,540	\$61,633		\$660,173
115-21-0900	1620 N MONROE CRESCENT TUCSON	1620 N MONROE CRESCENT TUCSON																\$833				\$833
CLASS	R3																	\$833				\$833

TAX PARCEL	PROPERTY ADDRESS	OWNER MAILING ADDRESS	PHONE	REC-DATE	LEGAL	DKT-PG	DESCRIPTION	POOL	HEATING	SOL	A/C	REFRIG	EXTERIOR WALL	ROOF	ASBESTOS	CLASS	CONDITION	TOTAL FCV	LAND-FCV	IMPR-FCV	EA	TOTAL LIM
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CLASS	R3																					

public lands of the United States situated in and located south of the 37th parallel and of the Sierra Nevada range of mountains in the State of California, as provided in said Acts of Congress and otherwise, and whereas said relinquishment and selection above referred to have been made in large tracts and embracing considerable additional lands other than those herein referred to, therefore the public records of the land office wherein the said land is located and selected is hereby referred to for designation of the land so relinquished and selected, and whereas, the said party of the first part has purchased from said owners of such land within the forest reserve the right under said Act of Congress to select hereinafter as aforesaid in place of the lands so relinquished as aforesaid, and such owners have agreed to select such land or lands from the descriptions furnished by second party and after the selection thereof to convey to first party all the right, title and interest therein to said first party by good and sufficient deed of conveyance; and whereas, the said first party has likewise agreed to convey to second party by good and sufficient deed of conveyance all his right, title and interest therein so acquired in the said land so selected and conveyed to him, and whereas, the said party of the first part has caused to be selected, under the direction of second party, and from the descriptions furnished by him as aforesaid, the lands hereinafter conveyed subject to the approval of the proper officers of the United States.

Now, therefore, said party of the first part and said letter V. Peabody, grantor aforesaid, in consideration of the sum of one dollar and other valuable considerations to first party in hand paid by second party, the receipt whereof is hereby acknowledged, remise, release and convey, subject to the agreements and conditions herein contained, unto the said party of the second part, his heirs and assigns, all those parcels and pieces of land selected as aforesaid and situated in the County of Pima and Territory of Arizona described as follows, to-wit:

The southwest quarter of the southwest quarter, Section three 37, Township fourteen 14 South, Range thirteen 13 East, Gila and Salt River Basins and Meridian.

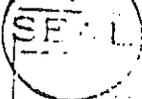
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the above described with the appurtenances unto the
 said party of the second part his heirs and assigns forever
 and the said grantee consent with second party his heirs
 and assigns that the land herein above referred to as
 situated within such great range and which land was
 relinquished to the United States of America by the said
 selector was, at the time of such relinquishment, lawfully
 owned by said selector and that the land so relinquished was
 at the time thereof free and clear from all incumbrances what-
 ever and that the said selector has good title to the said
 land so relinquished at the date of said relinquishment and
 had the right to so relinquish the same under the acts
 of Congress and to select other lands in lieu thereof, provided,
 however, and it is expressly understood and agreed between
 the parties hereto, that if the United States shall reject the
 title to any of the said land so relinquished, to it, and by
 reason thereof shall refuse to approve any of the selections
 made in lieu thereof as aforesaid, embracing the land herein
 conveyed or any part thereof, first party will cause to be selected
 in place thereof other lands of the kind permitted in place of
 such rejected and in which second party will furnish descriptions,
 and if the United States shall refuse on account of any such
 rejection to permit other land to be selected under the said
 act of Congress in lieu of any land so relinquished as aforesaid or
 in case of breach of any covenant or agreement in this indenture in
 respect to any land so relinquished and which breach shall
 prevent the further selection and approval of other lieu lands in
 place of any lands so relinquished as aforesaid, then the measure
 of damages to be recovered on account thereof shall be such a
 proportion, and no more, of the entire consideration paid as
 aforesaid by second party as the number of acres of relinquished
 lands to which the title thereof shall prove insufficient to
 warrant the selection of lieu lands as aforesaid, shall bear to the
 entire number of acres relinquished to the United States as
 aforesaid. That is to say, such damages shall be calculated at
 the rate per acre actually paid to party of first part, and for any

... the title to the said land shall be insufficient, and if such damage shall be considered payable within thirty days after such rejection and final decision thereon if appeal be taken from such rejection shall be made known to the said second party with the amount of damage which said second party shall be entitled to recover upon the consideration herein above expressed. It is further agreed by the parties hereto that if any part of the selection of live lands made as aforesaid under the direction of said second party and described and conveyed herein, shall not be approved by the proper officers of the United States for patent for any reason whatever, then said second party shall after a reasonable time after such failure of approval designate other selections in lieu thereof and furnish the necessary affidavit, and said first party shall thereupon make such selections and after approval thereof by the United States convey the same to the said second party, his heirs and assigns, subject to the covenants herein contained. In witness whereof, the said parties have hereunto set their names and seals the day and year first above written.

Hugo Seaberg seal
Lottie V. Seaberg seal

Secretary of New Mexico,
County of Colfax. Now this 24th day of January A.D. 1906, before me, the undersigned, a notary public within and for the said County of Colfax and Territory of New Mexico, personally appeared Hugo Seaberg and Lottie V. Seaberg, his wife, to me personally known to be the persons who executed the foregoing conveyance, and who to me acknowledged that they executed and delivered the same as their free and voluntary act and deed for the uses and purposes therein mentioned and set forth. In witness whereof, I have hereunto set my hand and notarial seal the day and year first above written.



J. J. Ostlund
Notary Public
Colfax County, N.M.

Filed recorded

Suit - Claim
Hugary and his wife of the
Mark A. B. R.
the second part, for
first part, for
lawful more
paid by the
is hereby wife
and quit. The
release and go
and to his. A
interest, claim
part has in a
property, situated
all of lots one
addition to the
plot of corner
the County
which said p.
description is
with all and
covenants before
right, title, for
the first part,
to the only part
the second part
In witness whereof, I have hereunto set my hand and notarial seal the day and year first above written.

A rejected
the first
is and
in and final
action of rejection
in it shall the
the entitled
expressed
my part of the
in the direction
and herein, shall
be cited states
aid second party
be in approval
I furnish the
thereupon
of by the
d part, his name
to their name

berg part
isberg part

D. 1906, before
for the said
appeared
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in conveyance,
I delivered
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both
in the day

he d
Gibbs
of County, N. M.

and received copies of this deed of the 5th of Feb. 1906
John Gibbs
County Recorder

Suit. Claim Due. This indenture, made the 7th day of
February in the year of our Lord One thousand nine hundred
and six between D. H. Manning & Gussie Manning, the
wife of D. H. Manning, the parties of the first part, and
Mark A. Rodgers, Trustee of the same, the party of
the second part, Witnesseth: That the said parties of the
first part, for and in consideration of the sum of Ten (\$10.00) dollars,
lawful money of the United States of America, to them in hand
paid by the said party of the second part, the receipt whereof
is hereby confessed and acknowledged, have remised, released
and quit. Claimed, and by these presents do convey, remise,
release and quit. Claim unto the said parties of the second part,
and to his heirs and assigns forever, all the right, title,
interest, claim and demand which the said parties of the first
part has in and to the following described real estate and
property situated in the County of Pinal and Territory of Arizona, to-wit:
Lot 16, 17, 18, 19, 20 and 21 in Block Eight I, Buckhorn
addition to the City of Tucson, Arizona, according to the map and
plat of survey thereof, duly filed and recorded in the files of
the County Recorder of said Pinal County, Arizona, reference to
which said records is hereby made in its most entire and complete
description hereof.

Witness and to hold the same, together
with all and singular, the appurtenances and rights
thereunto belonging, or in anywise appertaining, and all the estate,
right, title, interest and claims whatsoever, of the said party of
the first part, either in law or equity, in possession or expectancy,
to the only proper use, benefit and behoof of the said party of
the second part, his heirs and assigns forever.

In Witness Whereof, the said parties of the first part have here-
unto set their hands and seals the day and year first above written,
signed and delivered in the
presence of

D. H. Manning
Gussie Manning
Secretary of Arizona
County of Pinal
Richard M. A. M. Gibbons a Notary Public in and
for the Territory of Arizona

STATE OF ARIZONA
COUNTY OF PIMA

BOOK 2287 PAGE 294
A DEED OF GIFT OF THE ABOVE DESCRIBED REAL ESTATE
IN PIMA COUNTY, STATE OF ARIZONA

NO. 19825
DATE: 12 JUL 11 AM '66

Witness my hand and Official Seal
Indexed and Paged

ANNA GUMMERS
County Recorder

101

Request of
1966 JUN 11 AM '66

DEED

ARIZONA STATE EYES ASSOCIATION HOSPITAL

...thereby CONVEY unto the City of Tucson, a municipal corporation, intending to grant a fee simple interest and title therein including any right or reversion in the event of future abandonment or vacation thereof, the following described property situated in Pima County, Arizona:

All that portion of the SW 1/4 of Section 3, and of lot 11 of Section 10, T11N, R. 12E, G. 21B, B. 1M, Pima County, Arizona, described as follows:

PARCEL I: All that portion of the above lying within a strip of land 150 feet in width being 75 feet on each side of the following described centerline, to-wit: Beginning at the intersection of the centerline of West Speedway and Silverbell Road, (if they now exist); thence S 89° 57' 13" W, along said centerline of West Speedway, a distance of 250.00 feet to a point of curvature; thence, southwesterly along a curve to the left having a radius of 1806.77 feet and a central angle of 110° 52' 51", a distance of 371.65 feet to a point of tangency; thence S 77° 04' 51" W, a distance of 356.78 feet to a point of curvature; thence, westerly along a curve to the right having a radius of 1781.19 feet and a central angle of 120° 28' 21", a distance of 388.15 feet to a point of compound curvature; thence, northwesterly along a curve to the left having a radius of 1819.78 feet and a central angle of 169° 04' 11", a distance of 526.30 feet to a point of tangency; thence N 73° 12' 31" W, a distance of 401.83 feet to a point of curvature; thence, westerly along a curve to the left having a radius of 1701.87 feet and a central angle of 169° 38' 11", a distance of 520.31 feet to a point of tangency.

PARCEL II: The west 75.00 feet of said lot 11 of Section 10, except that portion lying within PARCEL I.

PARCEL III: A three-sided parcel in said lot 11 of Section 10, bounded on the North by the southerly line of PARCEL I, West by the east line of PARCEL II, and Northwest by the arc of a circle of radius 25 feet concave to the southeast and tangent to the north and west lines of said three-sided parcel.

subject to encumbrances of record for purposes of a trust, alley, right of way, paved thru way, or

1966 JUN 11 AM '66

Anna Gummars

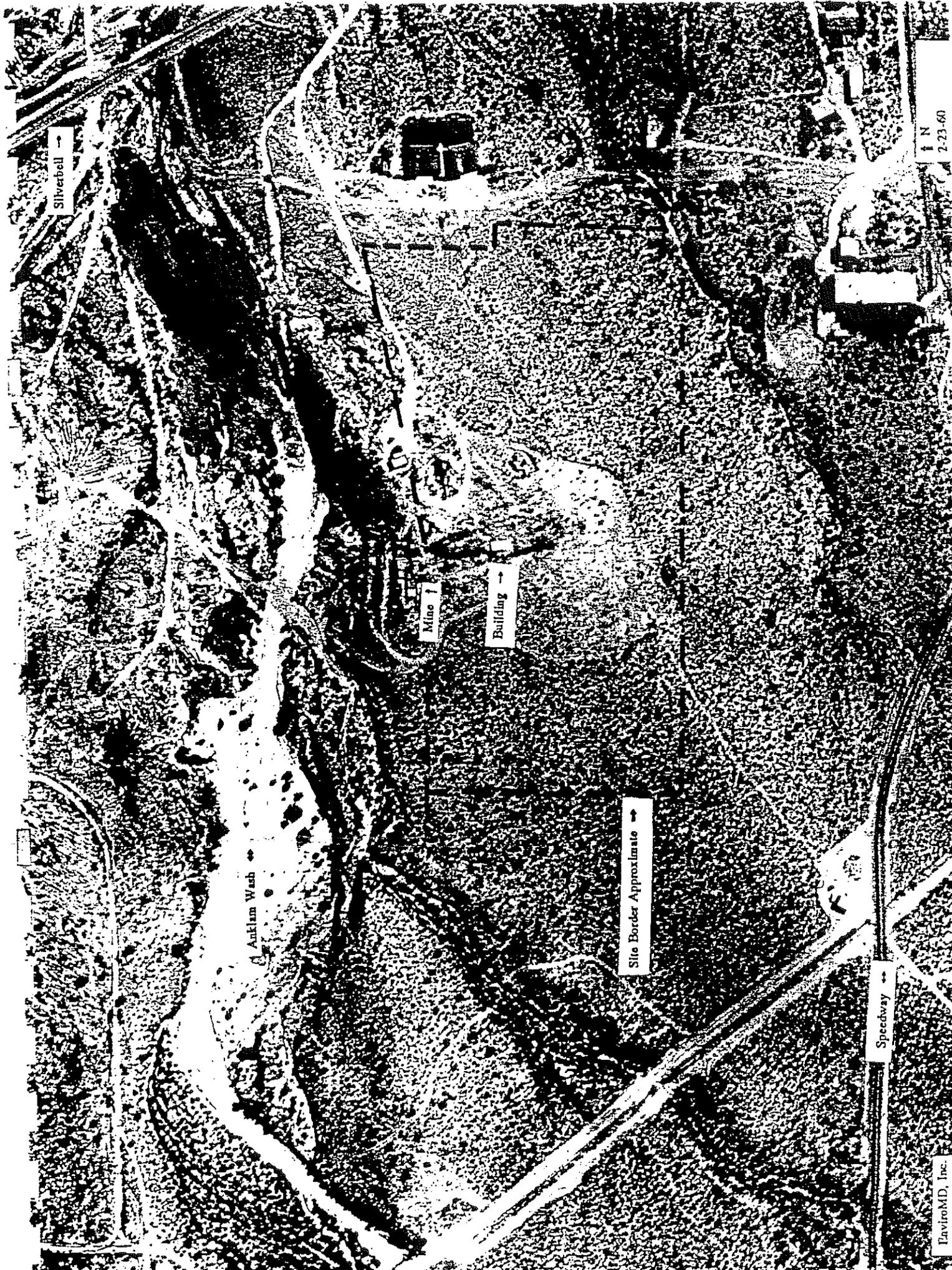
ARIZONA STATE EYES ASSOCIATION HOSPITAL, a corporation

STATE OF ARIZONA
COUNTY OF PIMA

...acknowledged before me this 12th day of June 1966

APPENDIX B

Aerial and Current Building Photographs



Silverbell →

Anklam Wash ←

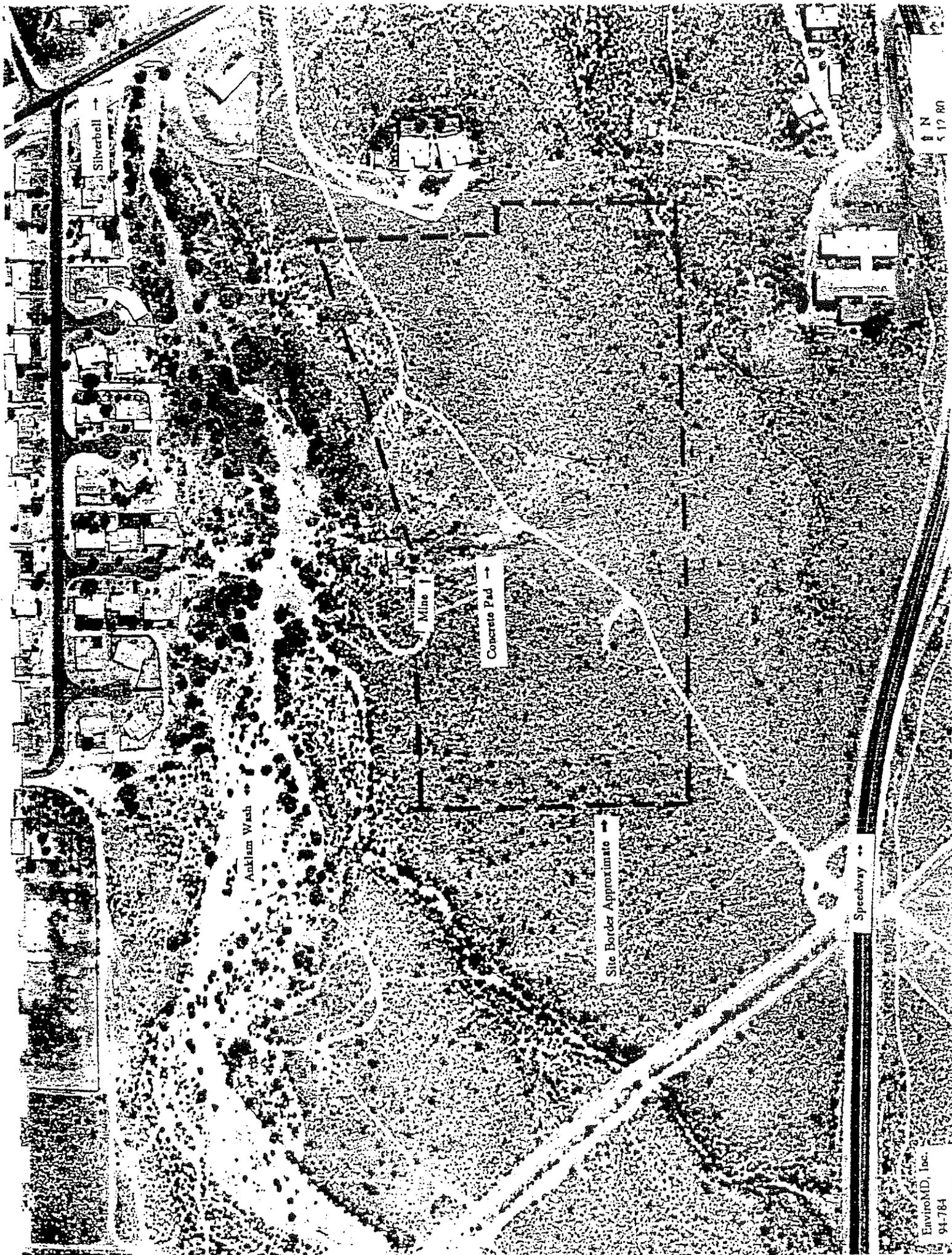
Mino ↓

Building →

Site Border Approximate ↔

Speedway ↔

N
2-23-60



Silverbell →

Anklam Wash ↔

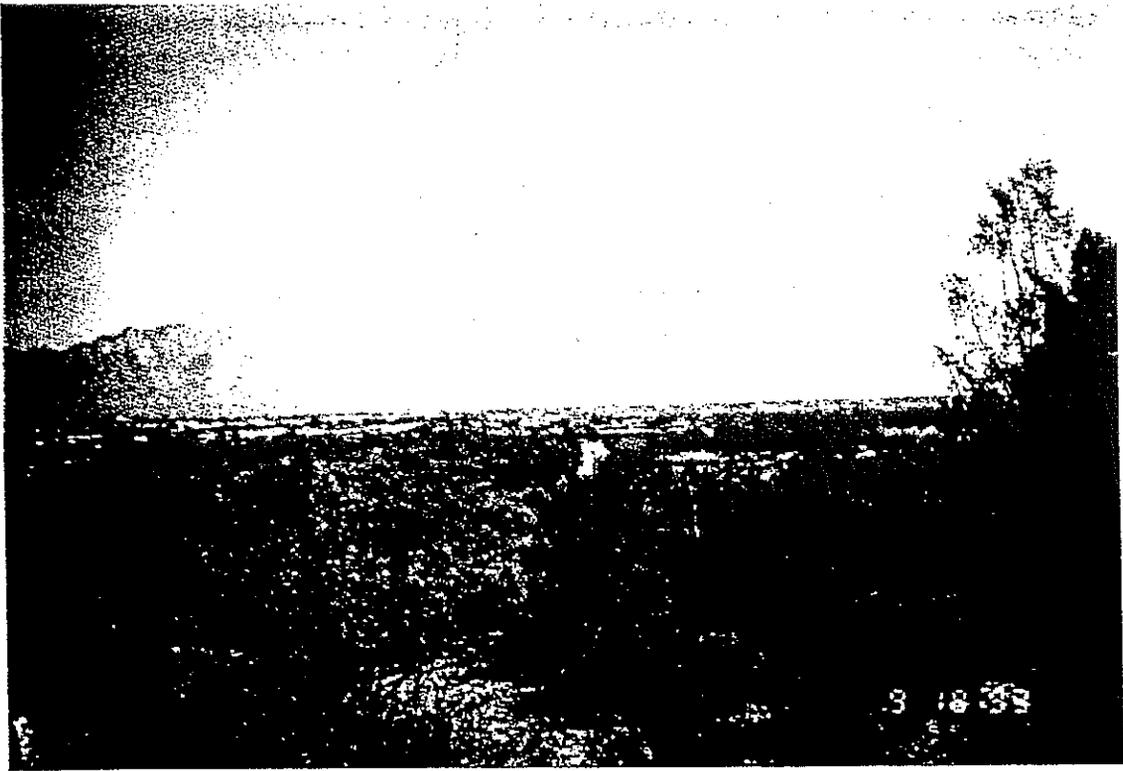
Milne ↓

Concrete Pad →

Site Border Approximate →

Speedway ↔

↑ N
5 12 80



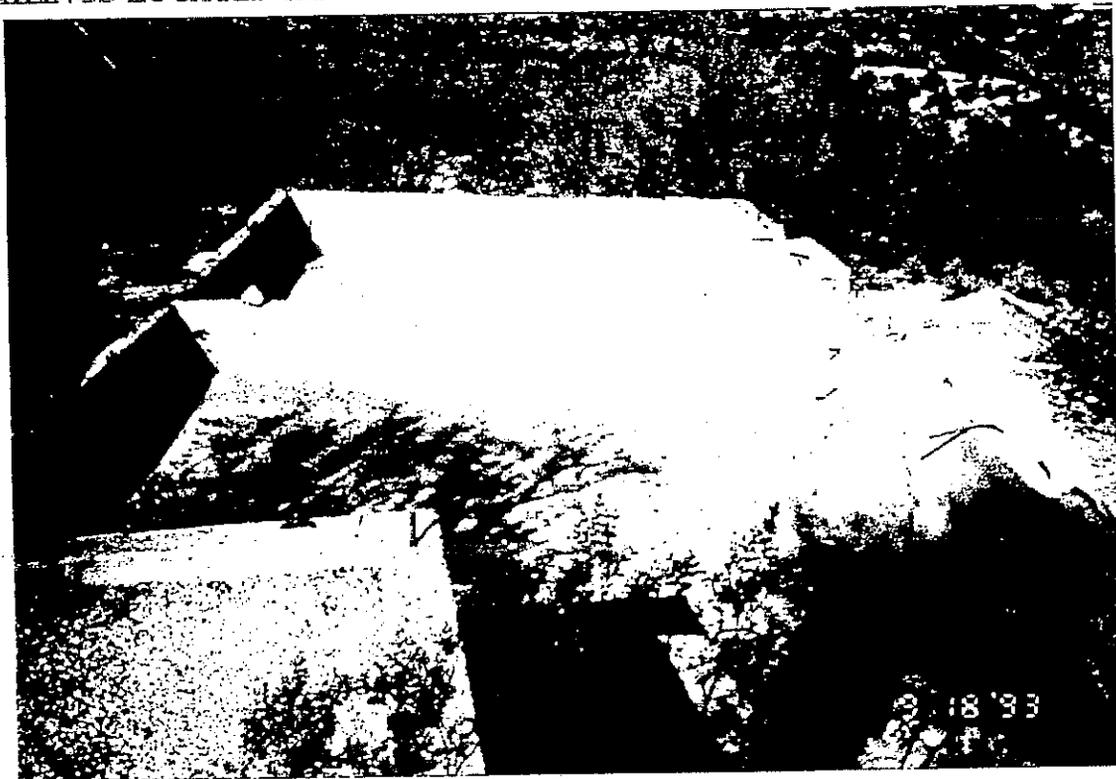
VIEW FROM SPEEDWAY BOULEVARD FRONTAGE LOOKING TO THE NORTH



REMAINS OF A WATER TANK LOCATED NORTHEAST OF THE ORE MILL



TAILINGS LOCATED AT ORE MILL ON SOUTH BANK OF ANKLAM WASH

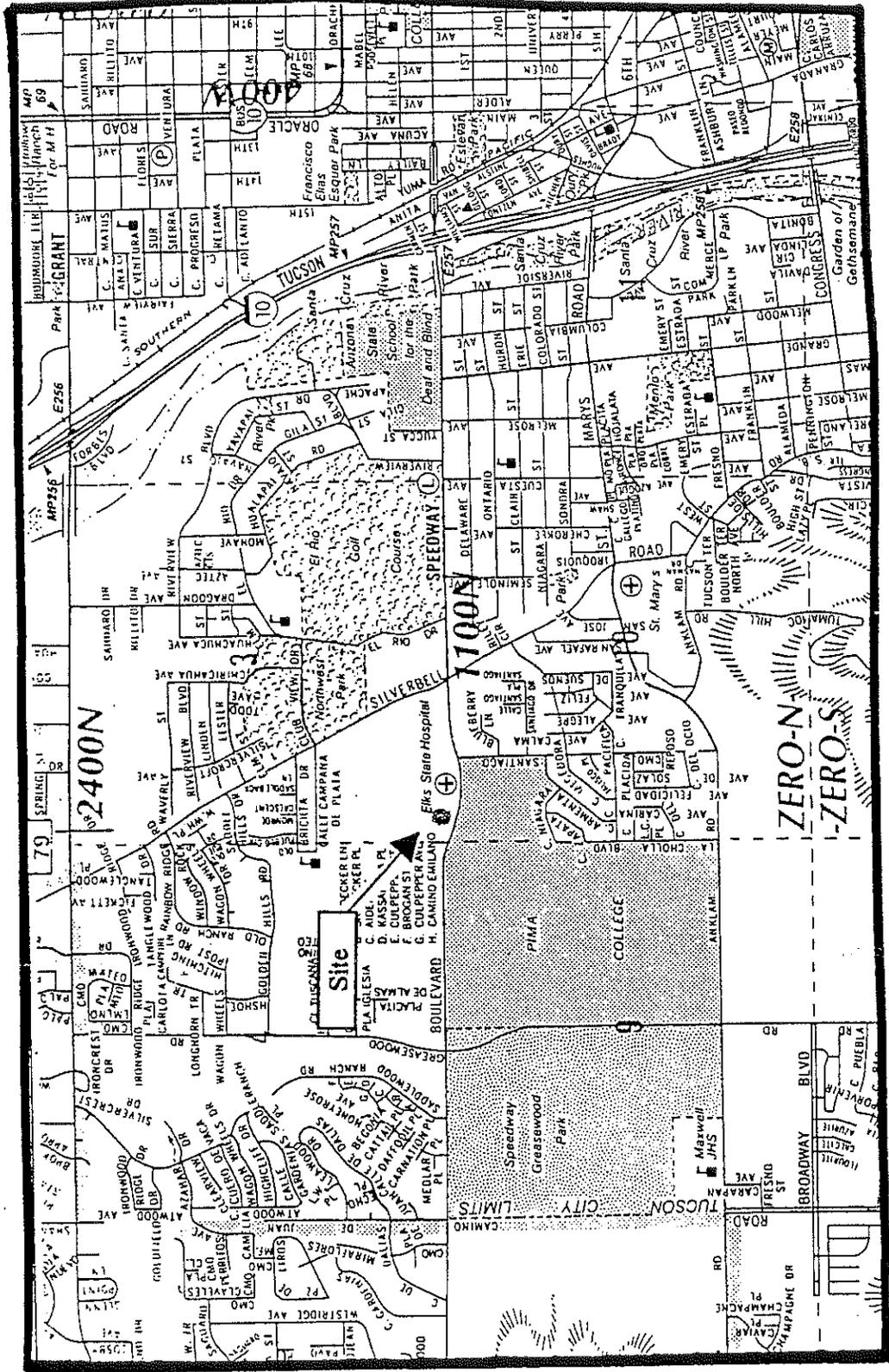


ORE MILL CONCRETE STRUCTURE LOCATED ON SOUTH BANK OF ANKLAM WASH

EnvironD, Inc.
Project #94-374
Phase I ESA
September 27, 1993

APPENDIX C

Location and Site Map



EnviromD, Inc.

Prepared by: *Stephany Franklin*
 Date: *9-23-96*
 Reviewed by: _____
 Date: _____

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SKETCH MAP: NOT TO SCALE

PROPERTY IDENTIFICATION

The subject property is located on the north side of Speedway, between Greasewood and Silverbell Roads, Tucson, Pima County, Arizona. The property is legally described as follows:

All that portion of the Southwest Quarter of the Southwest Quarter of Section 3, T.14 S., R. 13 E., G. & S.R.B. & M., Pima County, Arizona, described as follows:

Beginning at the southwest corner of Section 3;

thence N. $00^{\circ}12'47''$ E., along the west line of said Section, 995.43 feet to the northeast corner of La Cholla Boulevard as shown on the map or plat of COLLEGE TERRACE, a subdivision of Pima County, Arizona, as recorded in the Office of the Recorder of said County in Book 20 of Maps and Plats at page 15;

thence S. $89^{\circ}47'13''$ E., a distance of 20.00 feet to the TRUE POINT OF BEGINNING:

Thence S. $89^{\circ}47'13''$ E., a distance of 450.00 feet;

thence N. $79^{\circ}05'13''$ E., a distance of 796.64 feet to a point on a line parallel with and 60.00 feet westerly of the east line of said Southwest Quarter of the Southwest Quarter of Section 3;

thence S. $00^{\circ}02'14''$ E., along said parallel line, 489.59 feet to the southwest corner of that certain parcel conveyed by that certain Deed of record in said County Recorder's Office in Docket 896 at page 267;

thence N. $89^{\circ}57'46''$ E., along the south line of said parcel, 60.00 feet to a point on said east line of the Southwest Quarter of the Southwest Quarter;

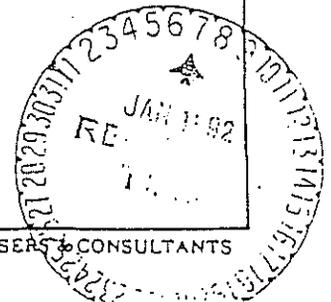
thence S. $00^{\circ}02'14''$ E., along said east line, 359.00 feet to a point on a line parallel with and 300.00 feet northerly of the south line of said Section 3;

thence N. $89^{\circ}49'24''$ W., along said parallel line, 1285.37 feet to a point on a line parallel with and 30.00 feet easterly of the west line of said Section 3;

thence N. $00^{\circ}12'47''$ E., along said parallel line, 565.41 feet to a point of curvature;

thence northeasterly, along the arc of a circular curve to the right, having a radius of 50.00 feet and an interior angle of $53^{\circ}07'48''$, an arc distance of 46.36 feet to a point of reverse curvature;

thence northeasterly, northerly, and northwesterly, along the arc of a circular curve to the left, having a radius of 50.00 feet and an interior angle of $143^{\circ}07'48''$, an arc distance of 124.91 feet to the TRUE POINT OF BEGINNING.



APPENDIX D

Agency References and Personal Communications

Agency References

- [1] Arizona Department of Environmental Quality, Office of Waste Programs, Superfund and WQARF Sites Fiscal Year 1992-1993 Property Request Information Package.
- [2] Arizona Department of Environmental Quality, Office of Waste Programs, RCRA Database, August 14, 1992.
- [3] Arizona Department of Environmental Quality, Office of Waste Programs, Directory of Arizona Municipal Solid Waste Landfills (MSWLF), Rubbish Landfills (RFL) and Private Solid Waste Landfills (PSWLF), February, 1993.
- [4] Arizona Department of Environmental Quality, Office of Waste Programs, Directory of Arizona Closed Solid Waste Landfills (CSWLF) and Closed Solid Waste Dumps (CSWOD), February, 1993.
- [5] Arizona Department of Environmental Quality, Office of Waste Programs, Arizona CERCLA Information and Data System (ACIDS) - zipACIDS List, December 30, 1992.
- [6] Arizona Department of Environmental Quality, Department of Underground Storage Tanks. Arizona UST-DMS Facility and Tank Listing by City, June 12, 1992.
- [7] Arizona Department of Environmental Quality, Department of Underground Storage Tanks. Leaking UST Listing, January 13, 1993.
- [8] Arizona Emergency Response Commission. SARA Title III Database, April 20, 1993.
- [9] Arizona Game and Fish Department. Drainage Map of Arizona Showing Perennial Streams and Some Important Wetlands. 1981.
- [10] Arizona Radiation Regulatory Agency & U.S. EPA. Home Radon Survey. 1989.
- [11] City of Tucson Building Code, Historic District & Landmark Overlay Zone (23-455). October, 1991.
- [12] City of Tucson Building Code, Scenic Corridor Overlay Zone (23-471). October, 1991.

Agency References Continued

- [13] City of Tucson Building Code, Hillside Development Overlay Zone (23-462). October, 1991.
- [14] City of Tucson Building Code, Environmental Resource Overlay Zone (23-472). October, 1991.
- [15] City of Tucson Development Services. Records Department. Personal Communication, Ms. Sandi Nolan, EnviroMD, with Ms. Elaine Rose. September 17, 1993.
- [16] City of Tucson, Tucson Water, Planning and Technical Services Division. Annual Static Water Level Basic Data Report. Tucson Basin and Avra Valley, Pima County, Arizona 1990. Report dated September 1992.
- [17] Department of the Interior, United States Geological Survey. Mineral resources of the United States. calendar Year 1909. Part I - Metals. Report dated 1911.
- [18] Pima Association of Governments. Metropolitan Tucson Basin Water Quality and Pollution Source Assessment. Final Report. March 1989.
- [19] Spencer J.E., Emer D.F. and Shenk J.D. "Background radioactivity in selected areas of Arizona and implications for indoor radon levels", Arizona Geological Survey, Open File Report 88-11, 1988.
- [20] Tucson Water CAP Information Office. Personal Communication, September 17, 1993.
- [21] United States, Federal Emergency Management Agency, Federal Insurance Rate Maps, Community Panel 15 of 90, City of Tucson, Pima County, Arizona, 1992.
- [22] United States Geological Survey. Catalina Mountain Quadrangle, 7.5 minutes series map. 1983.

APPENDIX E

Correspondence with Regulatory Agencies



Arizona State Museum

THE UNIVERSITY OF
ARIZONA
TUCSON ARIZONA

Tucson, Arizona 85721
(602) 621-6281
FAX (602) 621-2976

September 10, 1992

Ms. Julia Rosen
Industrial Hygienist
ENVIRO MD
4400 East Broadway Blvd.
Tucson, AZ 85711

Dear Ms. Rosen:

Thank you for your letter FAX of September 7th requesting an archaeological site file check for two projects. One is at 2200 East River Road, Suite 125 at T13S R14E Sec 20. The second one is at a vacant lot on the north side of Speedway between Greasewood and Silverbell roads at T14S R13E Sec 3.

The Archaeological Site Survey Files at the Arizona State Museum have been consulted with the following results. You requested an area of a mile surrounding the study property. With the first area there are no surveys along River Road but there are four surveys within the section. Three sites have been reported to the south of the road and they are AZ BB:9:16, 17, and 18. My maps do not allow me to locate a specific address, so do not know how close to these sites your property might be, nor do I know what construction has taken place on or next to the property. Surrounding sections contain the following information. Sec 17 has one survey and no known sites. Sec 18 no surveys one site AZ BB:9:6 and one remains reported. Sec 19 contains seven surveys and sites AZ BB:9:5 and 9. Sec 21 has three surveys and one site of AZ BB:9:22. Sec 28 has six surveys and the sites of AZ BB:9:12, 21, and 238. Sec 29 has four surveys along with sites AZ BB:9:7, 11, and 111. Finally Sec 30 has only two surveys and sites AZ BB:9:7, 8, and 9. This area certainly has (at least at one time) a high potential for the recovery of cultural remains. Survey would be recommended for vacant lots.

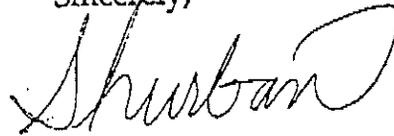
Project two for the vacant site on the north side of Speedway between Greasewood and Silverbell roads at T14S R13E Sec 3 contains sites AZ AA:16:333, 335, and 376 in the SW 1/4. In the NW 1/4 are located AZ AA:16:29 and 334. The northeast quarter contains AZ BB:13:84 and 85. There are at least ten surveys within this section, most are linear and outside of the southwest quarter. Sec 4 to the west has had the western half surveyed but there are no known sites for the entire section. Sec 9 has had the north half of the western half surveyed but sites were not found. There is a site, AZ AA:16:188 in the northeast corner of this section. And in Sec 10 there are several surveys and sites AZ AA:16:6, 26, 36, and 332, plus AZ BB:13:121, and remains have been reported. This area too has a high degree of probability for the recovery of cultural remains. Therefore the Arizona State

Ms. Julia Rosen
September 10, 1992
Page 2

Museum recommends that an on-the-ground survey be conducted on this property prior to any ground modification activities. Clearance on this property would not be recommended until after archaeological investigations have been completed by a qualified (based on standards established by the State Historic Preservation Officer) archaeologist.

If you have any questions concerning this statement, please feel free to contact me at 621-4011.

Sincerely,



Sharon F. Urban (Miss)
Public Archaeologist

sfu



DESERT ARCHAEOLOGY, INC.
3975 N. Tucson Blvd. Tucson, Arizona 85716
(602) 881-2244 FAX 881-0525

William H. Doelle, Ph.D.
President

August 3, 1993

Mr. Fiore Iannacone
Real Estate Division
City of Tucson
P.O. Box 27210
Tucson, Arizona 85726

ENVIRONMENTAL INC.
RECEIVED
SEP 17 1993

DESERT ARCHAEOLOGY LETTER REPORT 93-142
(DAI Project No. 90-107LN)

An Archaeological Survey of 21.4 Acres on the Northeast Corner of
Speedway Boulevard and the Proposed Extension of La Cholla Boulevard,
Tucson, Arizona

On July 15, 1993, archaeologist Mark Elson of Desert Archaeology conducted an archaeological survey of a 21.4-acre parcel for the City of Tucson at the northeast corner of Speedway Boulevard and the proposed extension of La Cholla Boulevard. The survey was undertaken under the authority of the State of Arizona General Antiquities Permit 93-13 and was conducted to determine whether the parcel contained any significant archaeological or historical remains prior to the City of Tucson's selling of the parcel for development.

A single historic archaeological site (designated AZ AA:16:376 [ASM]), an isolated historic artifact, and four isolated prehistoric artifacts were found within the project area. This report provides the project area location and description, project methods, archaeological survey results, and recommendations.

PROJECT AREA LOCATION AND DESCRIPTION

The project area is located on the west side of the Tucson Basin, west of the Santa Cruz River, within the low foothills and bajada zone of the Tucson Mountains (Figure 1). The legal description for the parcel is T14S, R13E, Section 3, SW ¼ of the SW ¼. It is situated on a colluvial terrace, bounded by a large unnamed wash on the south side and Anklam Wash to the north, and much topographic relief is present (Figure 2). Vegetation within the parcel consists primarily of creosotebush with a brittlebush, bursage, and grass understory. Scattered mesquite, paloverde, acacia, ocotillo, barrel cactus, and saguaro are also present. Vegetation density is highest in the two washes that bound the project area. The ground surface is highly deflated, and archaeological visibility is very good.

This area lies in the Santa Cruz Valley, overlooking the Santa Cruz River floodplain to the east (Effland and Rankin 1988). The Santa Cruz floodplain and adjacent terraces comprise an archaeologically rich zone that includes Paleoindian, Archaic, Hohokam, Papago, historic Spanish



large quantities of animal bone, sun-purpled glass, china, pieces of copper and other metal, and wood beams. The midden has not been pothunted and appears to be in relatively good shape, although it is threatened by the continued bank erosion of Ankiam Wash.

The house foundation within the project area measures approximately 17 m (55 ft) east-west by 11 m (35 ft) north-south. It is constructed out of 1-2 courses of large boulders, some measuring as large as .9 to 1.2 m (3 to 4 ft) in diameter. The foundation contains no evidence of burning and no evidence of the material used for the construction of the superstructure. Unfortunately, it also contains no cultural trash, so its age and function are unknown. Several piles of dark black (slag-like?) material are situated north of the foundation, and a dirt berm, possibly bulldozer made, may be associated with the foundation to the south. It is unknown if the house foundation is actually related to the historic ore mill and homestead, but it was provisionally included within the site area due to its proximity.

RECOMMENDATIONS

AZ AA:16:376 (ASM) is believed to be eligible for inclusion in the National Register of Historic Places under Criterion D (36 CFR 1202). Criterion D states that cultural properties have the quality of significance in American history or archaeology if they "have yielded, or may be likely to yield, information important in prehistory or history."

Only a portion of the site extends into the project area; the major features (the ore mill and homestead) fall outside of the northern boundaries of the 21.4-acre parcel. Within the project area, the significance, age, and function of the historic features (the pit, cement pads, and isolated foundation) are currently unknown. Therefore, it is recommended that archival research and a significance assessment be undertaken prior to the sale of the parcel by the City of Tucson. A preliminary search of the city records (Document 39 [DRE 39], p. 291) indicates that this land was relinquished to the City of Tucson in 1906 by Hugo and Lotti Seaberg of Colfax, New Mexico, who possessed the homestead patent. This, along with the artifact assemblage from the homestead trash midden, suggests that the ore mill and homestead predate this time. It also suggests that the isolated foundation within the project area may predate 1906 as well, although this is less certain and in need of further research.

The five isolated artifacts found within the remainder of the project area are not believed to be significant, given their isolated occurrence on a slope above a wash. Therefore, archaeological clearance for the area of the parcel outside of the designated AZ AA:16:376 (ASM) site boundaries is recommended.

Prepared by:



Mark Elson
Archaeologist

Reviewed by:



Patricia Castalia
Operations Director

SHPO REPORT ABSTRACT

AGENCY: City of Tucson.

PROJECT TITLE: An Archaeological Survey of 21.4 Acres on the Northeast Corner of Speedway Boulevard and the Proposed Extension of La Cholla Boulevard, Tucson, Arizona.

PROJECT DESCRIPTION: Archaeological survey undertaken to provide an archaeological assessment prior to the sale of the property by the City of Tucson.

LOCATION: The survey is situated in the Tucson Mountain foothills on the west side of Tucson, Arizona. The legal description is T14S, R13E, Section 3, SW ¼ of the SW ¼, USGS CAT MOUNTAIN, 7.5' series.

NUMBER OF SURVEYED ACRES: 21.4

NUMBER OF SITES: 1

LIST OF ELIGIBLE SITES: AZ AA:16:376 (ASM). This is a historic homestead and ore mill dating to the late 19th and early 20th centuries. It is believed to be eligible for inclusion in the National Register under Criterion D.

LIST OF INELIGIBLE SITES: 0

COMMENTS: The site is believed to be eligible for National Register inclusion. However, only a portion of the site extends into the project area, and most of the major features fall outside of the project area. Therefore, additional archival research and a significance assessment of the portion of the site within the project area are recommended.

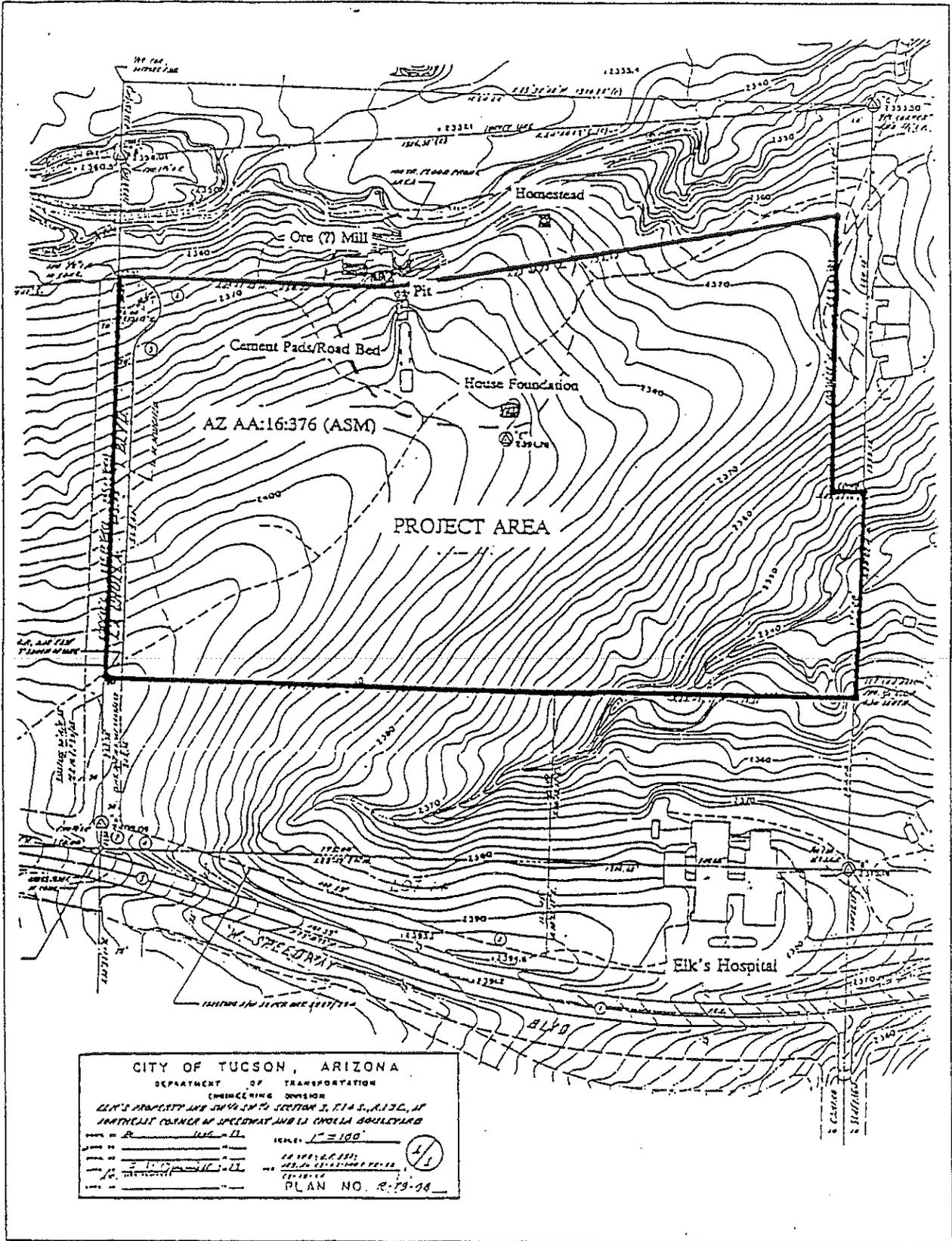


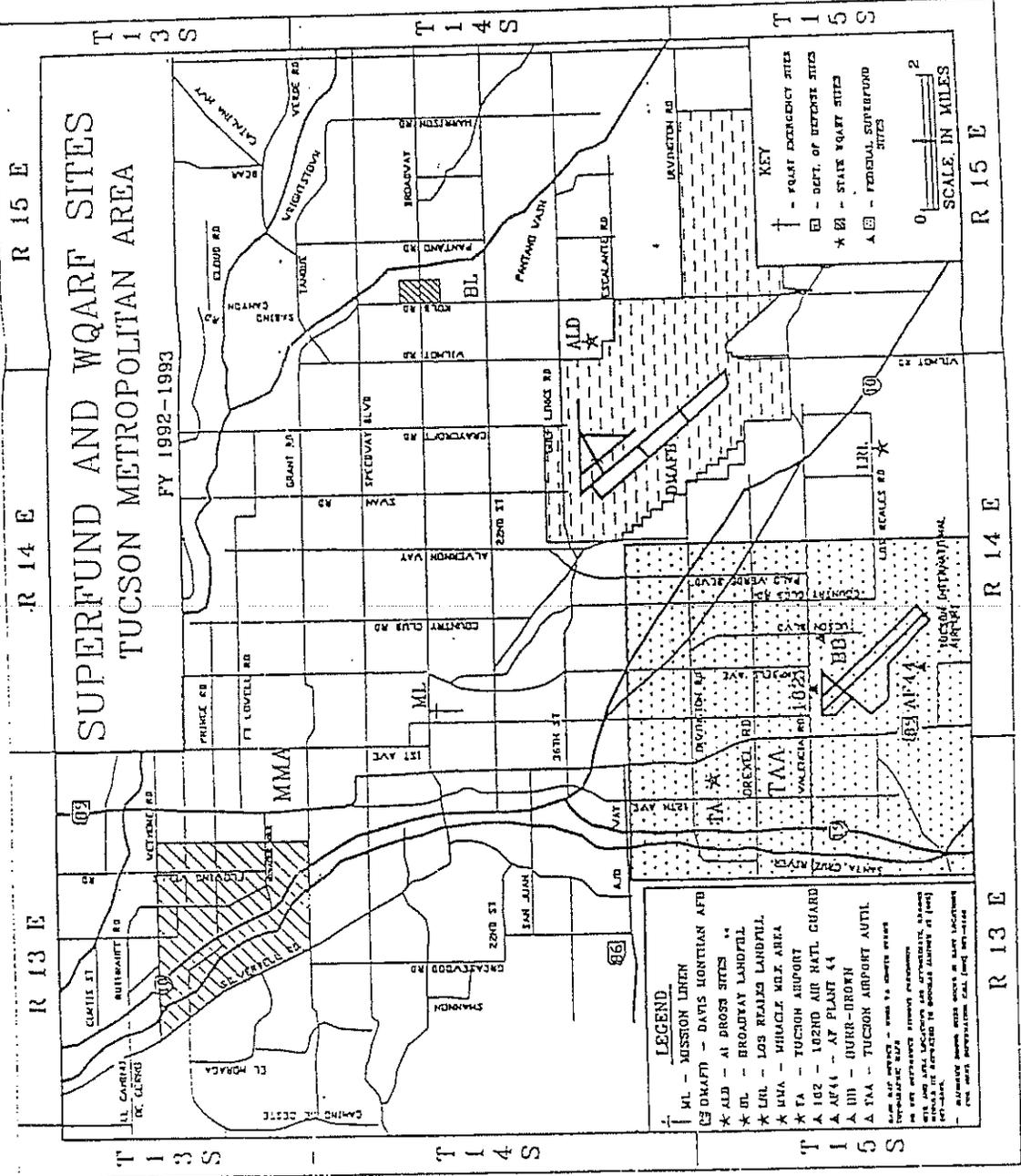
Figure 2. Photocopied portion of City of Tucson topographic map of the project area, showing location of site AZ AA:16:376 and associated historic features discussed in the text.

APPENDIX F

Reference Documents: Tucson NPL & WQARF Site Map

SUPERFUND AND WQARF SITES TUCSON METROPOLITAN AREA

FY 1992-1993



- LEGEND**
- † ML - MISSION LINES
 - (DRAFT) - DAVIS MONTHIAN AFB
 - * ALD - AT PROSE SITES
 - * BL - BROADWAY LANDFILL
 - * LRL - LOS REALES LANDFILL
 - * HWA - HUALACALE MEX AREA
 - * TA - TUCSON AIRPORT
 - * FA - 102ND AIR RATT. GUARD
 - A 102 - 102ND AIR RATT. GUARD
 - A AF44 - AF PLANT 44
 - A 001 - BURR-BROOK
 - A TAA - TUCSON AIRPORT AUTIL
- THE TUCSON METROPOLITAN AREA SUPERFUND AND WQARF SITES MAP IS A PRELIMINARY MAP AND IS SUBJECT TO CHANGE WITHOUT NOTICE. THE TUCSON METROPOLITAN AREA SUPERFUND AND WQARF SITES MAP IS A PRELIMINARY MAP AND IS SUBJECT TO CHANGE WITHOUT NOTICE.

- KEY**
- † - FQAR EMERGENCY SITES
 - - DEPT. OF DEFENSE SITES
 - * BL - STATE WQARF SITES
 - A □ - FEDERAL SUPERFUND SITES

0 1 2
SCALE, IN MILES

APPENDIX G

Environmental Property Profile

TABLE I Applicable Regulations for Environmental Assessments

TABLE II RCRA Reporters

TABLE III List of Landfills

TABLE IV Arizona CERCLA Information & Data System List

TABLE V SARA Title III Reporters

TABLE VI List of Underground Storage Tanks (USTs)

TABLE VII List of Leaking Underground Storage Tanks (LUSTs)

TABLE I

APPLICABLE REGULATIONS FOR ENVIRONMENTAL ASSESSMENTS

RCRA	The Resource Conservation and Recovery Act. It regulates the generation, handling, transportation, storage and disposal of hazardous wastes.
HSWA	The Hazardous and Solid Waste Amendments of 1984. This Act extended the scope and application of RCRA.
CERCLA	The Comprehensive Environmental Response, Compensation, and Liability Act of 1980. Also known as "Superfund," this Act, along with SARA, applies to illegal discharges, abandoned facilities, etc.
SARA	The Superfund Amendments and Reauthorization Act extends and expands the original Superfund.
TSCA	The Toxic Substances Control Act. This Act regulates the production, handling, and use of certain toxic substances such as PCB's, asbestos, and aerosol propellants.
FIFRA	The Federal Insecticide, Fungicide, and Rodenticide Act.
CWA	The Federal Clean Water Act regulates contaminants in water.
CAA	The Federal Clean Air Act regulates emissions into the air.
USTA	The Federal Underground Storage Tank Act of 1986. This Act regulates operational and abandoned underground storage tanks. There are local enforcement policies which may differ from the federal program.
AzEQA	The Arizona Environmental Quality Act manages several Federal programs on the state level.
WQARF	The Arizona Water Quality Assurance Revolving Fund. This is a state Superfund program which focuses on groundwater quality.

TABLE II
RCRA REPORTERS¹

FACILITY	ADDRESS	G N T P S N					
		E	R	R	E	R	O
		N G S R C N					
St. Mary's Hospital	1601 W. St. Mary's	1					NN
ADOT Materials							
Testing Lab	1444 W. Grant	1					NN
Chevron #9-6231	2385 N. Silverbell	2					NN
Skyline Labs, Inc.	1775 W. Saguaro	2					NN
Southwestern							
Radiation Oncology	1815 W. St. Mary's	2					NN
St. Mary's Imaging							
Center	1750 W. Anklam	2					NN

(ADEQ RCRA Reporter List, 11/17/92)

Abbreviations:

GEN = Generator

 1=Full Quantity Generator

 2=Small Quantity Generator

 3=Very Small Quantity Generator

NRG = Generator RCRA Status Description

 1=Conditionally exempt SQG

 2=Definitionally excluded wastes

 3=Delisted wastes

 4=One-time generator

 5=Periodic generator

 6=No longer generating hazardous waste, still in business

 7=No longer generating hazardous waste, out of business

 8=Never generated hazardous waste

 9=ID number to transport hazardous waste

 10=Regulated under another ID number

TRS = Transporter - C=for hire S=for self X=commercial status unknown

PER = Permitted (Y/N)

SRC =Source of information N = notification
A = Part A
R = Annual/Biennial report
E=EPA Inspection
S=State Inspection
NON = Non Notifier Facility - X=Non-notifier

TABLE III
LANDFILL LISTINGS

FACILITY	USGS LOCATION	LOCATION DESCRIPTION
Municipal Solid Waste Landfill (MSWLF):		NONE LISTED ADEQ FEB. 1993
Rubbish Landfill (RLF):		NONE LISTED ADEQ FEB. 1993
Private Solid Waste Landfills (PSWLF):		NONE LISTED ADEQ FEB. 1993
Closed Solid Waste Landfill (CSLF):		NONE LISTED ADEQ FEB. 1993

Sources: Arizona Department of Environmental Quality, Office of Waste Programs, Directory of Arizona Municipal Solid Waste Landfills (MSWLF), Rubbish Landfills (RFL) and Private Solid Waste Landfills (PSWLF), February, 1993.

Arizona Department of Environmental Quality, Office of Waste Programs, Directory of Arizona Closed Solid Waste Landfills (CSWLF) and Closed Solid Waste Dumps (CSWOD), February, 1993.

TABLE IV

ARIZONA CERCLA INFORMATION

FACILITY	ADDRESS	PRELIMINARY ASSESSMENT
ADOT Service Yard	1444 W. Grant Rd.	1-7-88
Arizona Express	2100 N. Dragoon	Not Listed
KR Acoustical Spraying	2181 N. Calle Del Suerte	Not Listed
Strip Joint	2112 N. Dragoon, #5	Not Listed

Source: CERCLA Information & Data Systems (Acids) Zipacids List ADEQ 12/30/92

TABLE V

SARA TITLE III REPORTERS

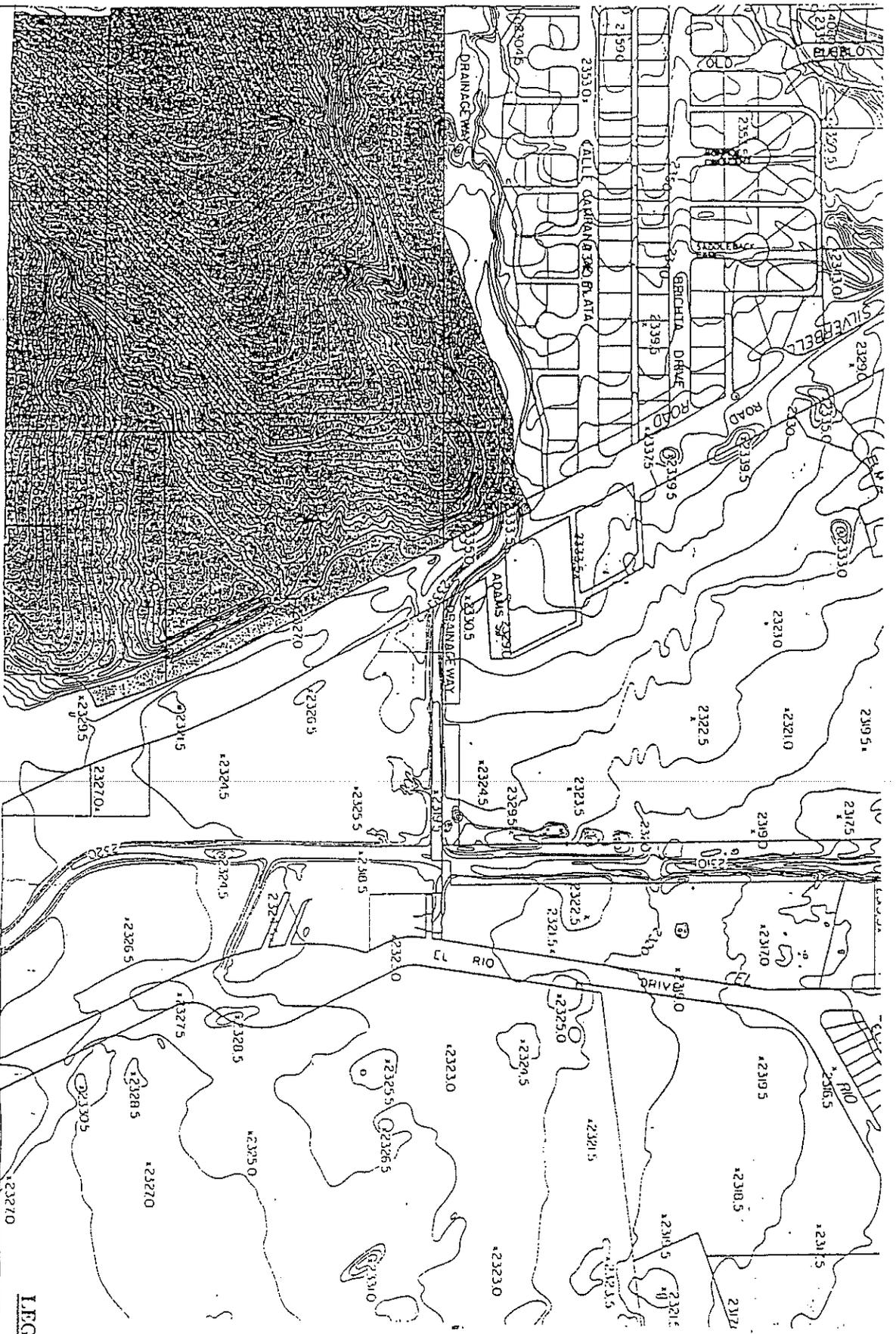
FACILITY	ADDRESS	CHEMICALS REPORTED
Whiting Station #159U	1530 W. St. Mary's	Gasoline
Pima Co. Wastewater MGMT. Mt. Gardens WWTP	1020 N. Via Roma	Chlorine
Chevron Service Station #9-6231	2385 N. Silverbell	Gasoline
7-11 Store #20196	St. Mary's & Silverbell	Gasoline and Diesel Fuel
Sonotronics	2618 W. Calle Tonalá	Not found
Conway Western Express	2202 N. Dragoon	Diesel Fuel

Source: Arizona Emergency Response Commission. SARA Title III Database, April 20, 1993.

APPENDIX H

Special Resources Documentation

HILLSIDE DEVELOPMENT ZONE

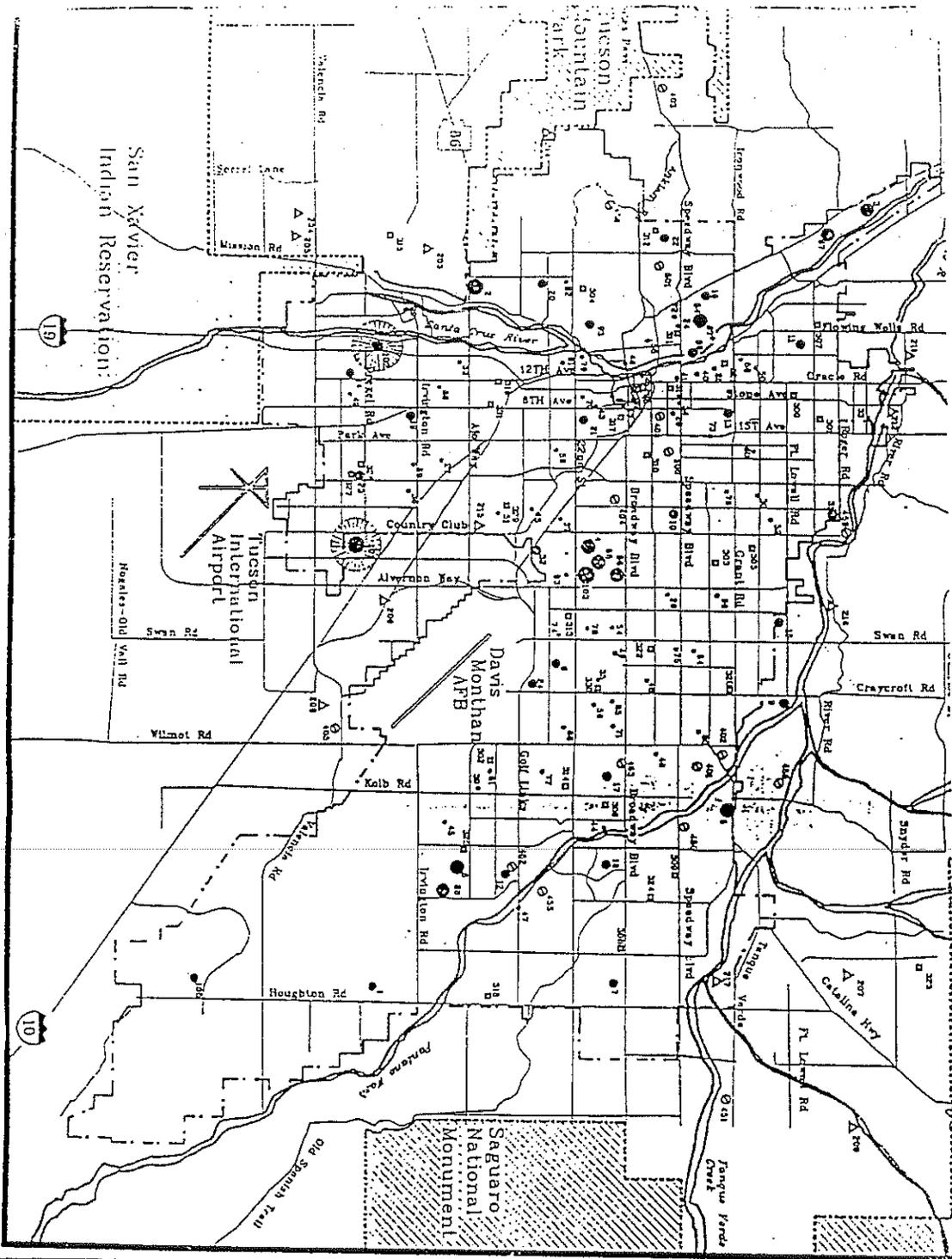


LEGEND

THESE MAPS ARE SOLELY FOR THE PURPOSE OF IDENTIFYING LAND AREAS WHICH REQUIRE REVIEW IN ACCORDANCE WITH SEC. 23-562, HILLSIDE DEVELOPMENT ZONE. UNLESS OTHERWISE NOTED, THE ELEVATION CODES ARE NOT TO BE USED TO CALCULATE THE AVERAGE CROSS SLOPE OR FROSTLINE.

COMMENTS:

x



PARKS & FACILITIES PLAN

EXHIBIT III

LEGEND

CITY PARKS

- NEIGHBORHOOD PARKS
- DISTRICT PARKS
- REGIONAL PARKS

OTHER FACILITIES

- SCHOOLS
- ▲ COUNTY PARKS
- PRIVATE/QUASI-PUBLIC
- ADDITIONAL FACILITIES
- PROPOSED PARKS

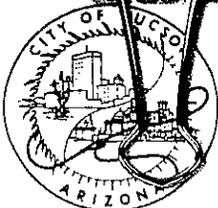


CITY LIMITS

THE PLANNING CENTER



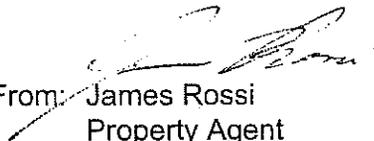
JOB: 198-01
DATE: 11-20-88
SCALE: 1" = 1/2 MI



MEMORANDUM

Date: February 19, 1997

To: Karen Masbruch
Director
Office of Environmental Management

From: 
James Rossi
Property Agent
Real Estate Division

Subject: EnviroMD report dated 9/20/93 of a 21 acre City owned parcel @
La Cholla and Speedway

Attached is a copy of the subject report. Please provide this office with your opinion regarding this report, its recommendations and a cost estimate for any necessary testing. The subject property is proposed to be sold by the City and the cost of testing the site may be a critical part of the negotiation process.

Thank you for your assistance.

xc: Hector F. Martinez, Real Estate
Fiore Iannacone, Real Estate

