



# ENVIRONMENTAL ASSESSMENT

Downtown Motor Apartments

Phase I Environmental Site Assessment

Partial Report

# PARTIAL

May 14, 2015

**Phase I Environmental Site Assessment  
Complies with ASTM Practice 1527-13 as Amended  
Includes ASTM 2600-10 Vapor Intrusion Survey**

**Centralized address 383 South Stone Avenue  
Stone Motor Hotel - Fully Developed Land  
City of Tucson, Pima County, Arizona**

**Project ID: MCT\_1411**

**Prepared For:**



**SUBJECT**

**Compass Affordable Housing, Inc.  
2835 North Stone Avenue  
Tucson, AZ 85705**

**Prepared By:**



**Com Sense, INC.  
3863 East Forge Avenue  
Mesa, Arizona 85206  
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**Developed By:**



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Certified Environmental Inspector #13227\*  
Certified Environmental Manager #13227\***

**\*Environmental Assessment Association (EAA)**

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2835 North Stone Avenue  
Tucson, AZ 85705

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EPA "All Appropriate Inquiries" Rule

**STONE MOTOR HOTEL**

**Assessors Parcel Number:**  
**117-14-0930**

**Stone Motor Hotel Centralized address:**  
**383 South Stone Avenue**  
**City of Tucson, Pima County, Arizona**

Prepared by:



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through the Environmental Assessment Association (EAA)  
Qualified under EPA "All Appropriate Inquiries" Rule

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# **SECTION I SUMMARY**

ASTM Format ID 4.1

## **4.2 Introduction**

As authorized by Compass Affordable Housing a Phase I Environmental Site Assessment (ESA) was performed on the property identified in section 4.2.2 below.

The purpose of this assessment and associated records review is to obtain and document records that will help identify recognized environmental conditions in connection with the subject property.

Three elements working together constitute a complete review. These include the records review, site reconnaissance, and interviews. If information from one source indicates the need for more information, other sources may be available to provide information. For example, if a previous use of the property as a gasoline station is identified through the records review, but the present owner and occupants interviewed report no knowledge of an underground storage tank, the person conducting the site reconnaissance should be alert for signs of the presence of an underground storage tank.

This practice does not normally include any testing or sampling of materials (for example, soil, water, air, building materials). Unless specifically defined in the proposal quotation. This assessment has undertaken a Vapor Intrusion Survey in accordance with ASTM 2600-10 to address area findings for leaking underground storage. This assessment and data are included in this standard ASTM Practice E 1527-13 compliant review which has been updated to reflect changes in October 2013 with ASTM 1527-13, and provides additional assurance of Due Diligence in consideration of area environmental effects.

It is useful to note that this review has been helped immeasurably by a cycle of ongoing site observations and the original Phase I investigation and report conducted February, 2014. The cycle of area development and property status has benefitted from more than 14 months of observation and additional and on-going review under §24 CFR Part 58 for federal funding considerations.

## New Standards Summary

Because new ASTM standards were introduced in November 2013, we can summarize the adjustments between ASTM 1527-05 and the new ASTM 1527-13 as largely editorial and the basic regulatory requirements of the two standards remain substantially the same. Knowing ASTM regulatory changes were coming our reviews have focused on preliminary releases for the update which have been in effect since January 2013. Now that these changes have been finalized we can summarize the effect or changes to our review standard as follows:

We continue to recognize REC (recognized environmental condition) to be a release to the environment but also consider the definition to include any release inside a building from any source inside of the building in our evaluation. For example, a drum leaking inside a warehouse that is not likely to impact the land beneath the building is no longer considered a REC.

The term HREC (historic recognized environmental condition) and now includes for our reviews a full historic search of prior potential business operations within a 1 mile radius of our subject which might have a potential environmental effect or maybe under agency controls for cleanup with no use restrictions. This broadens our consideration for environmental registrations in an area which are benign due to monitoring and cleanup with oversight from the appropriate agency.

With these new definitions and review considerations a new term is recognized and may appear in reporting notated as CREC (controlled recognized environmental condition). We have always recognized that registrations that have conditions resolved i.e. a "clean closure" with no restrictions as having no impact environmentally on a subject.

Our reviews continue to focus on review of title and judicial records for ALU's (activity and use limitations) relative to any property. The emphasis that we wish to place on this new standard is for judicial review. Our assessments while conducting first-person title review work with the appropriate records office also includes a third-party review for ALUs.

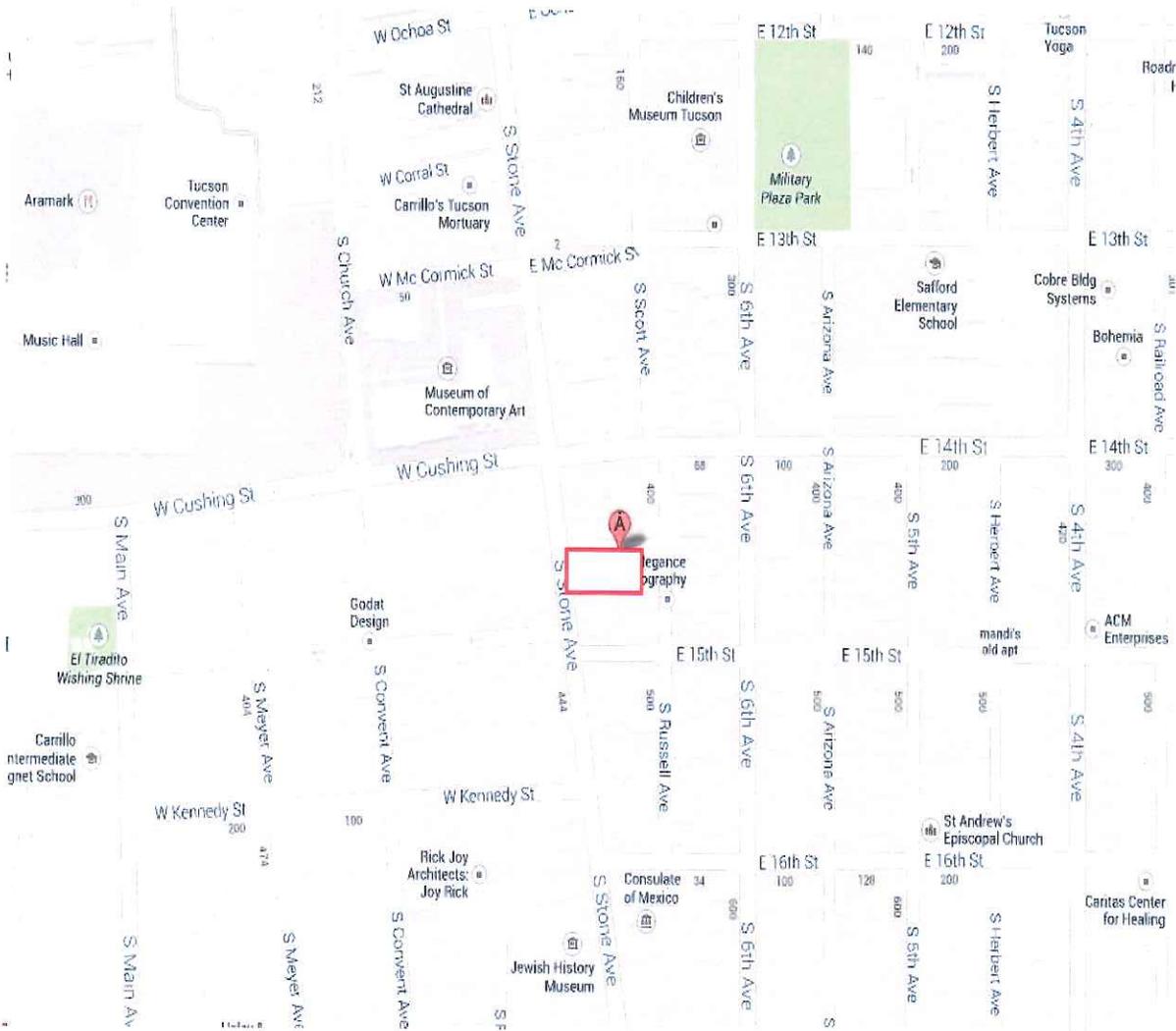
Finally, we find that expanded regulatory file reviews are needed and in the spirit of meeting a higher due diligence our reviews include physical site data related to area water and dry well research. The effect of this review has the side effect of expanding the report volume, however; the demonstrated additional diligence is an affirmation of the final opinion concerning related environmental effects. This additional diligence has also expanded implications of vapor intrusion and new language in the regulatory update explicitly includes contaminants by likely pathways to the subject property. With that said, it is explicitly stated that ASTM E 2600 is not a requirement of phase I ESA E 1527. ASTM E 2600-10 is a separate and more comprehensive assessment of vapor mitigation. Unless we are certain that there are no vapor pathways to a subject the majority of reviews will include, and incorporate a vapor intrusion survey in our standard assessment. The VIA (vapor intrusion assessment) or VIS (vapor intrusion survey) are considered synonymous and in many federally funded projects are a minimum requirement.

#### 4.2.2 Detailed Scope-of-Services

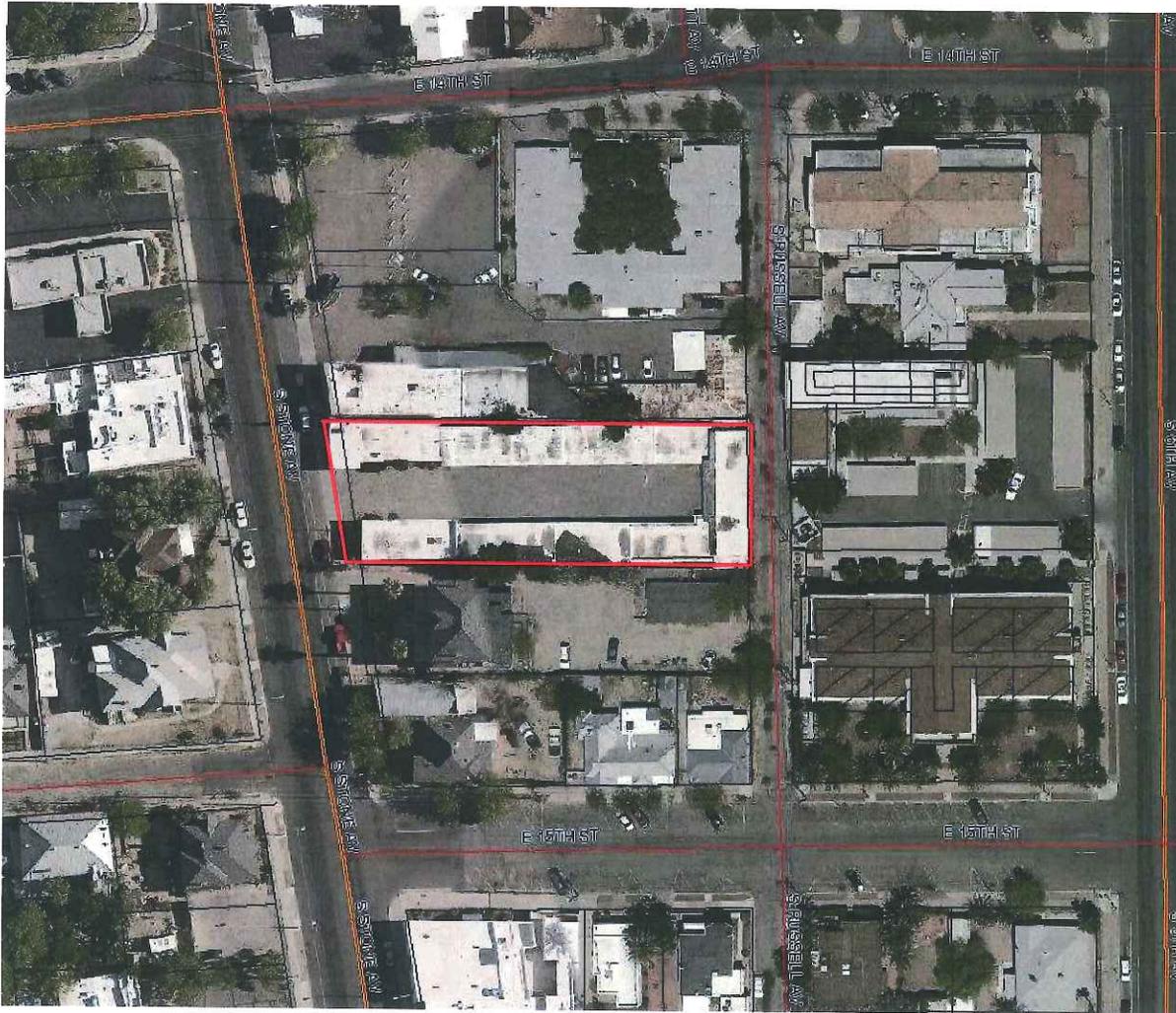
As authorized by Compass Affordable Housing a Phase I Environmental Site Assessment (ESA) was performed on the property identified below. This assessment was performed specific to the developed commercial residential facility lot identified by Pima Assessors office as Parcel ID: 117-14-0930 (1 lot approximately .51 acres (point 51) total) which is zoned for commercial residential use. The location was plotted to a geocode of latitude 32.21660 longitude -110.96990 but can be located by Tucson Fire Department GIS as 383 South Stone Avenue, Tucson, Arizona.

All location references are specific to the subject property which maintains the same site specific address and zip code of 85701 To assist in visualizing the property location, the following is a map of the subject:

*Approximate Subject Outlined in Red identified by "A"*



The subject property is currently fully developed with existing commercial residential housing. The total parcel is approximately .51 acres (point 51) surrounded by professional services, retail business and commercial residential housing. This location is identified by Tucson Fire Department (and Pima County municipal services) GIS as 383 South Stone Avenue, Tucson, Arizona 85701. This site is fully identified as a contiguous development with assessors parcel number of 117-14-0930. The aerial below shows the configuration of the subject and position relative to streets and other site development:



*The subject site in the high definition aerial above is outlined in a bold red line. This aerial provides a clear visual representation of the area of potential effect (APE) reviewed.*

This review is designed to provide good commercial and customary practice in the United States of America for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants within the scope of Comprehensive

Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) and petroleum products. This review is conducted in a fashion and intended to permit our client to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability (hereinafter, the "landowner liability protections," or "LLPs"): that is, the practice that constitutes "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined at 42 U.S.C. §9601(35)(B). Controlled substances are not included within the scope of this standard. However, our firm when conducting an environmental site assessment as part of an EPA Brownfields Assessment and Characterization Grant awarded under CERCLA 42 U.S.C. §9604(k)(2)(B) must include controlled substances as defined in the Controlled Substances Act (21 U.S.C. §802) within the scope of the assessment investigations to the extent directed in the terms and conditions of the specific grant or cooperative agreement. Additionally, an evaluation of business environmental risk associated with a parcel of commercial real estate may necessitate investigation beyond that identified in this section of our definition of service scope.

Our review as part of a standard of good commercial and customary practice for conducting an environmental site assessment of a parcel of property, has the specific goal to identify recognized environmental conditions. The term recognized environmental conditions means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term includes hazardous substances or petroleum products which may be in current compliance with laws. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions and while our report may reference these it is only for prospective on the site conditions.

Petroleum products are included within the scope of our review specifically because they are of concern with respect to many parcels of commercial real estate and our current custom and usage is to include an inquiry into the presence of petroleum products when doing an environmental site assessment of commercial real estate. Inclusion of petroleum products within the scope of this practice is not based upon the applicability, if any, of CERCLA to petroleum products. This report does include a Vapor Intrusion Assessment using ASTM E 2600 standards.

The scope of this review includes research and reporting requirements that support our client's ability to qualify for the LLPs. As such, sufficient documentation of all sources, records, and resources utilized in conducting the inquiry required by this review are provided in a single written report (this report).

Our report commitment is to:

- (1) to synthesize and put in writing good commercial and customary reporting for environmental site assessments for commercial real estate;
- (2) to facilitate high quality, understandable environmental site assessments;
- (3) to ensure that the standard of all appropriate inquiry as it is being defined is met; and,
- (4) to guide legal interpretation of the LLPs so the client has indemnification from any potential future environmental discoveries.

#### 4.2.3 Significant Assumptions

Site reviews and all investigation is based on a series of basic assumptions. We presume the following relative to this parcel:

1. The parcel is considered a single contiguous development on a single Assessor's parcel number: 117-14-0930.

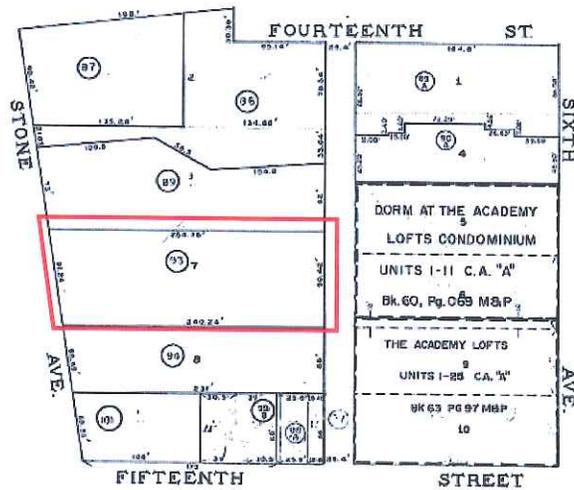
Defined by the Pima County Assessors Final Plat Mapping Below:

#### ASSESSOR'S RECORD MAP

48 5A

117-14  
5/21

BLOCK 232. CITY OF TUCSON



C.O.T.  
D. ROBERT

SEE BOOK 3, PAGE 70 M & P.  
2009-3

03 070 211

687 8

This "common area" plat found in Pima County Assessors office records in book 3 page 70 provides the full final scope of the project on record as it exists at the time of this review.

Regardless of any mapping or identification anomalies the parcel under study is the site represented by the Pima County Assessor parcel number and our own area of potential effect reviews which is inclusive of approximately 150 feet beyond the located property line boundaries of the identified parcel.

2. No industrial uses or leases have been made of this property;
3. There is unrestricted access to the site; and,
4. The site is designated for commercial residential use and never been previously developed in a commercial capacity.

The following legal description was used to determine the specific property boundaries:

Lot 7 in Block 232 of the City of Tucson, Pima County, Arizona according to the official survey, field notes and map is made and executed by S. W. Foreman and approved and adopted by the Mayor and Common Council of said city (then Village) of Tucson, on June 26, 1872, a certified copy of which map is of record in the office of the County Recorder of Pima County, Arizona in Book 3 of maps and Plats at page 70 thereof.

#### 4.2.4 Limitations and Exceptions

The use of this report is strictly limited to the scope set forth in section. 4.2.2. The following identifies, for informational purposes, certain environmental conditions (not an all-inclusive list) that may exist on a property that are beyond the scope of this practice but may warrant consideration by parties to a commercial real estate transaction. These elements include:

Radon, (preliminary area tests obtained)  
Asbestos, (preliminary sampling conducted)  
Lead-Based Paint, (preliminary sampling conducted)  
Lead in Drinking Water,  
Wetlands (general clearance especially for flood zone effect),  
Regulatory compliance,  
Cultural and historic resources,  
Industrial hygiene,  
Health and safety,  
Ecological resources,  
Endangered species (general clearance),  
Indoor air quality (Radon survey of area),  
Biological agents, and  
Mold (visual only with recommendations for action).

The need to include an investigation of any such conditions in the environmental review is a determination made by Com Sense, INC. and confirmed in writing by the client. Review needs are evaluated based upon, among other factors, the nature of the property and the need for performing the assessment (for example, a more comprehensive evaluation of business

environmental risk). Should a fully documented investigation be desired that aspect of review must be agreed upon between the client and environmental professional as additional services beyond the scope of this review as defined by section 4.2.2 must be determined prior to initiation of the environmental site assessment process to be included in this report.

This report does not address whether requirements in addition to all appropriate inquiry have been met in order to qualify for the LLPs (for example, the duties specified in 42 U.S.C. §9607(b)(3)(a) and (b), including the continuing obligation to take reasonable steps to prevent releases, or the duty to comply with legally required release reporting obligations).

This report does not address requirements of any state or local laws or of any federal laws other than the all appropriate inquiry provisions of the LLPs. Clients are cautioned that federal, state, and local laws may impose environmental assessment obligations that are beyond the scope of this report. Users should also be aware that there are likely to be other legal obligations with regard to hazardous substances or petroleum products discovered on the property (if any) as a result of this site review. As a result of discovery, subsequent site requirements are not addressed in this report. It should be understood that these requirements may pose risks of civil and/or criminal sanctions for non-compliance.

This report does undertake specific asbestos testing to determine from typical samples the likelihood of asbestos-containing particles that could become airborne during demolition or renovation. On-site asbestos review can be conducted using a microscope to detect the crystalline structure. For this review preliminary tests were also conducted for lead-based paint which included interior and exterior samples collected and taken to a laboratory to determine if lead in paint exceeded 5000 ppm (HUD standard for mitigation).

#### 4.2.6 User Reliance

Com Sense, INC. is not required to verify independently the information provided in this report but may rely on information as provided from sources unless we have actual knowledge that certain information is incorrect or unless it is obvious that certain information is incorrect based on other information obtained in the Phase I Environmental Site Assessment or otherwise actually known to the environmental professional. We always look for inconsistencies in report material.

This report has been prepared for the exclusive use of Compass Affordable Housing and reliance is extended specifically to Bethel Development and Arizona Department of Housing (ADOH). Reliance may be further extended to other parties should Compass Affordable Housing require and direct. This report is not intended for use by any other parties unless reassigned at the request of Compass Affordable Housing. The information, results, and conclusions contained in this report are valid for a period of one hundred eighty days (180) days from the date on the report. Any use of this report beyond the one hundred eighty (180) day period or use by others at any time is at the sole risk of the user.

## SECTION II SITE DESCRIPTION

### 4.3 Site Description

#### 4.3.1 Location and Legal Description

This assessment was performed specific to the developed and undeveloped site (approximately .51 acres (point 51) ) zoned for commercial residential use. The location was plotted to a geocode of latitude 32.21660 longitude -110.96990 but can be located by Tucson Fire Department GIS 383 South Stone Avenue, Tucson, Arizona. A map of this site can be found in Section I item 4.22 of this report. The site description used for environmental studies is as follows:

The project site is considered to be Lot 7 in Block 232 in City of Tucson Assessor office archives as recorded by Pima County, Arizona, in Book 3 of Maps and Plats at page 70 and as fully defined as Assessors parcel number 117-14-0930.

The description of the subject as defined by Section 4.2.3 accurately reflects the site identified in this report as “Subject” or “Subject Property”. Further, references to Downtown Inn, or Downtown Motor Hotel, Stone Motor Lodge or Stone Motor Hotel are alternative names for the subject as identified.

#### 4.3.2 Site and Vicinity General Characteristics

The subject location will use full City of Tucson and Pima County approved utilities and infrastructure. All water, sewer and electrical services logistics have been confirmed with the City of Tucson and Pima County Planning and Engineering Departments (providing support services to the City of Tucson) as available and suitable for the commercial residential uses of this location. This site has full services access along Stone Avenue. All pole mounted utilities in the area have been placed in public right-of-way and there are no service poles on the private property of the subject. Most of the utility services have been placed underground in this area of the city as part of extensive infrastructure investments.



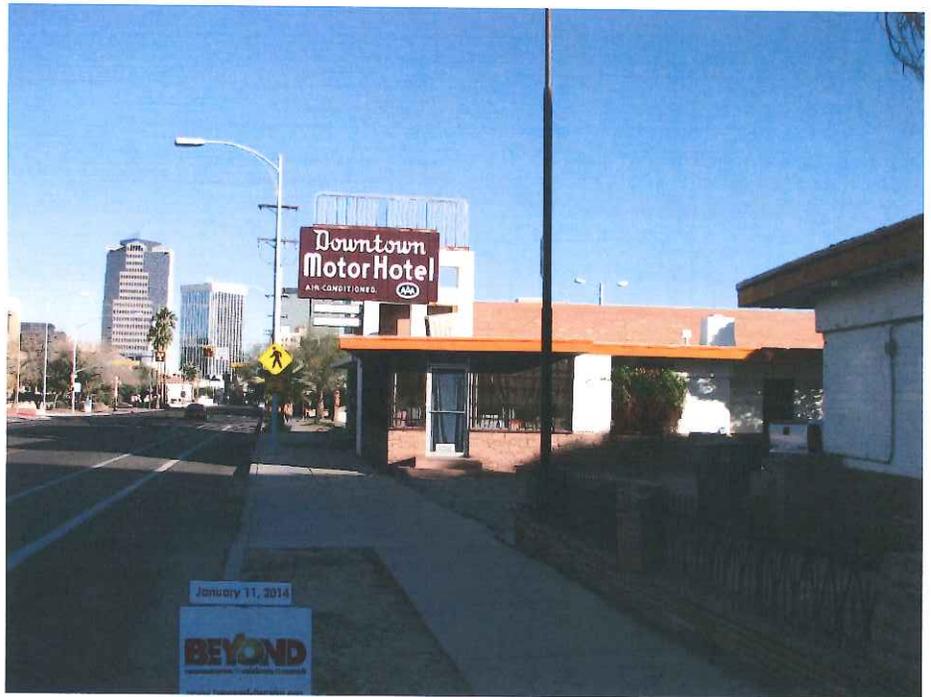
The overview aerial above taken in 2013 by the Pima County Assessors office provides the property location under study outlined by the broad red line and letter "A". This view also shows the adjacent development surrounding the subject. The total parcel is approximately .51 acres (point 51) surrounded by developed commercial residential service businesses and residentially occupied housing on all sides. All of these are visible and generalized in the aerial view.

The reviews of available records including City of Tucson and Pima County building records indicate that easement and development permits have not been revised for the subject property since 2009 for any access requirements involving this property (these permits were for drainage and alley access maintenance on the East side of the property).

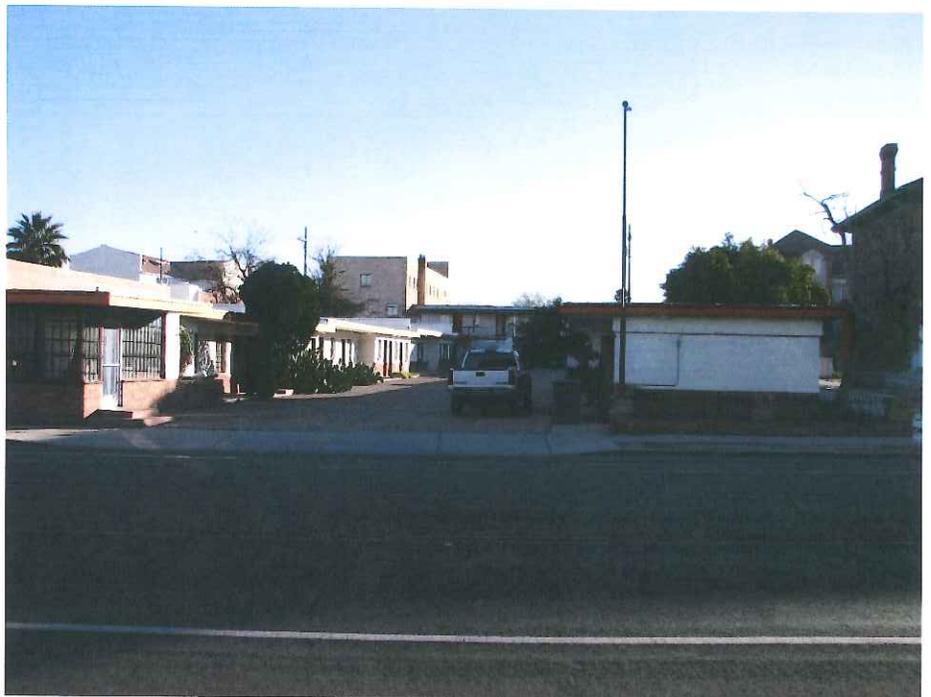
There are no undeveloped portions of the site and the existing commercial residential units were first built in about 1941. Further discussion of the history will be documented in Section III under Historical Uses. The site is classified as a site zoned appropriate for commercial residential multi-family housing by City of Tucson and Pima County. Both City of Tucson and Pima County encourage special need residential uses and services in this area. This is considered an "affordable housing" mixed use project by the City of Tucson Consolidated Plan.

### 4.3.3 Current Use of the Property

This is the typical view from Stone Avenue of the primary signage at Downtown Motor Hotel. The units have been secured, but are not in commercial residential occupancy as intended. One unit is noted as occupied by site management/security at least on a temporary basis. Overall the site would be considered maintained and secure.



Residential buildings have public sidewalk access both from parking lots situated in the centralized area and depicted at right with direct access from Stone Avenue a 3 lane street (center turn lane) in the foreground.



The developed site is secure but is not had structural maintenance in at least the last 5 years.

The picture at right is typical of the site and building condition. All doors to all units were tested as well as windows and found secure.



The structure currently in a dilapidated condition does serve as storage for dry goods and remaining artifacts from years of past usage. This view from the back alley shows some vandalism but careful assessment at the site indicates all units are resistive of any unauthorized entry attempt.



#### 4.3.4 Descriptions of Structures, Roads, Other Improvements on the Site

There are virtually no sensitive environmentally important site improvements on the fully developed site. Notably the site is about .51 acres (point 51) (all areas collectively) and 32 apartments, single floor and one two story commercial residential sitting at the east end of the lot. This development includes fully improved parking, curb, gutter and sidewalks on the site.



Vegetation at the subject is primarily native ornamental bushes and cactus which is typical of surrounding developments. All plantings are cultivated and there is no evidence of chemically treated landscaping. None of the trash viewed on site was commercial or industrial in nature. All would be considered household rubbish and non-impacting to any environmental condition for this report.

There are signs of mechanical maintenance from trash pickup and loose debris removal, but very little else has been seen at the site to indicate updates to parking areas, public access walkway or any recreational areas.

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#### 4.3.5 Current Uses of Adjoining Properties

The subject is generally surrounded by professional offices, residential services and residential rental and owner occupied housing.. In the picture at right is a view from the street in front of the subject.

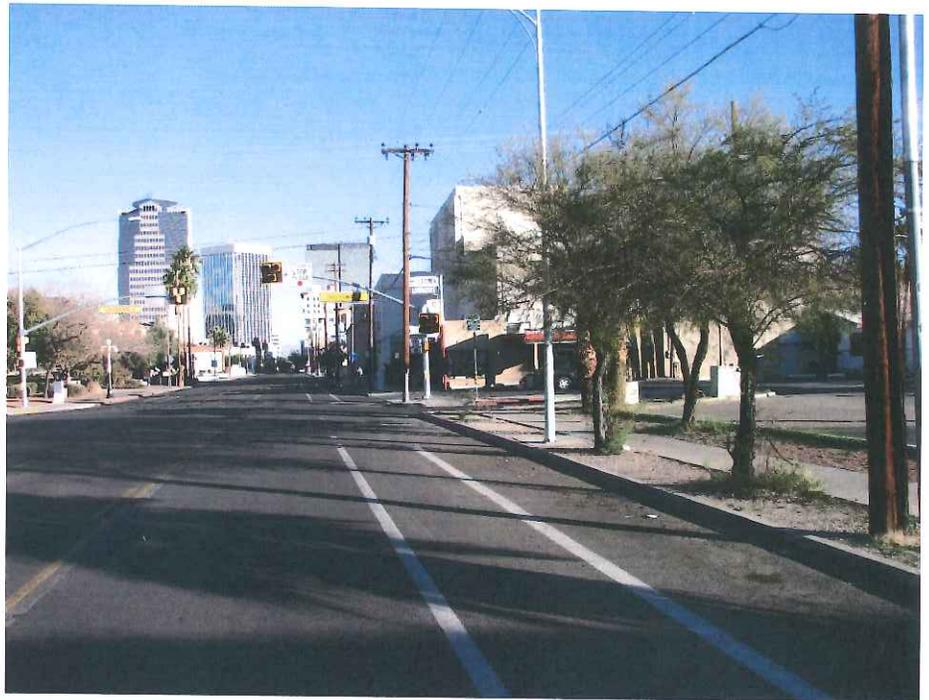
It was noted in reviews this area has diverse uses permitted, however; manufacturing and industrial uses would be considered nonconforming. The highest and best use according to City of Tucson Planning would be residential development. All of the current uses and developments are in conformance with city code.



Typical of the area and adjoining the subject is single family residential housing and multifamily rental housing. Generally the streets in this area are residential access locations and prohibit through traffic heavy trucks.



The view at right is a view to the North on Stone Avenue standing in front of the Motor Lodge. This is representative of both the development in the area and the condition/style of the common development. This view would be considered looking to City of Tucson town center. As might be expected more business and more high-rise development can be noted moving further north.



More common to development in the area is conversion of churches, public facilities and single family residential housing from their original design frequently dating back to the 1930s.

All adjoining uses are well defined lots and within many cases a zero lot line setback. Adjoining and on site reviews for any evidence of adverse environmental effects did not reveal any hazardous effect. Records searches for all of the adjoining properties were conducted for storage of volatile chemicals or medical waste disposal and none of the adjacent developments have any known adverse environmental effects (currently or historically).



There are no environmentally registered or cited commercial or industrial uses on the subject site, and no current registrations within 500 feet of the subject, however; in our review we did find a dry cleaners at 340 South Stone Ave. that was closed in 1951 and another at the same location

that was closed in 1960. Neither of these locations have a citation for any environmental infraction. The closest cited adverse effect to our subject was at 260 South Stone Ave. Which is the City of Tucson police/fire fuel island with fuel spills in 1993. Will expand on these further in the appropriate section, however; all of the offending leaks were certified removed in 1993. All of the area effect discovered within 1/4 mile of the subject presented no apparent adverse environmental conditions to the subject. There are no "undeveloped" or raw land spaces on the subject or adjoining the subject which might present a concern for future development uses.

The area was walked to determine if there were petroleum spills or other storage which might indicate an adverse environmental impact. No storage or running spills were seen and all of the subject site and adjacent areas for 1/8th mile were reviewed on foot.

#### **4.4 User Provided Information**

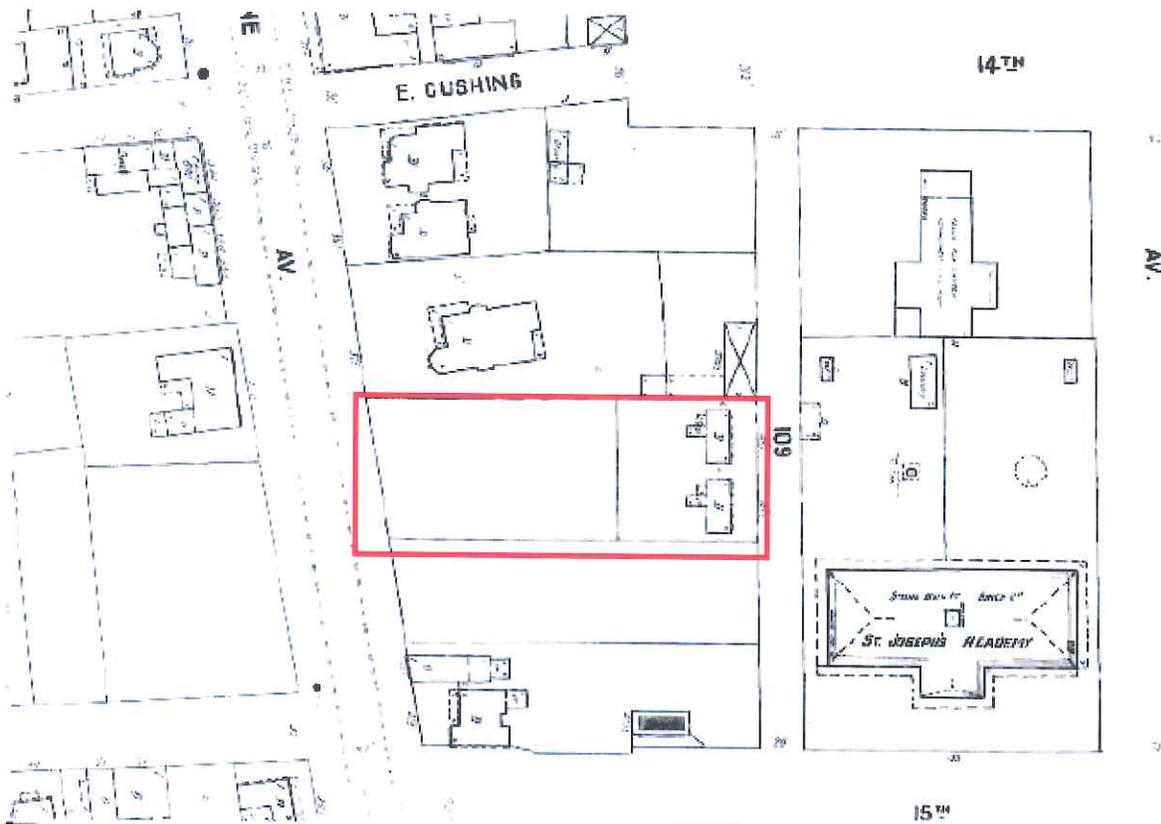
##### 4.4.1 Title Records

The property ownership is currently South Stone Properties LLC since 2011 with conveyance from Downtown Inn, Inc. Title search history was found in book 13970, page 1190. In our review we located an original 1993 conveyance from long time property owner Larry Naughton, who maintain possession of the site from 1970s to 1999 when title was conveyed to the Downtown Inn, Inc.

Additionally, the County Tax records research was conducted to determine if there have been prior commercial uses of the subject (uses other than commercial residential) and there have been no prior uses of the site other than commercial residential. The Pima County filed site record was used as our basis of review and for the purpose of tracking a 40 year chain of use for this site. The reviews of title records are primarily to determine the potential uses of the site especially as might relate to any adverse environmental effect. We were fortunate in this review to be able to obtain Sanborn Fire Insurance mapping related to this area and specifically to our subject site. These review materials are fully provided in source in Section V, Appendix "C"

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The following summarize Sanborn material was found to be revealing as to a long history of commercial residential use for our subject:



Site Name: Stone Motor Hotel  
 Address: 382 South Stone Avenue  
 City, ST, ZIP: Tucson AZ 85701  
 Client: Com Sense  
 EDR Inquiry: 382530.3  
 Order Date: 1/14/2014 8:33:00 AM  
 Certification #: 555E-45E-1-B3D1  
 Copyright: 1501



Our subject consisted of large vacant lot fronting on Stone Avenue with 2 single family residential units set at the back of the lot. This was the use in 1901.



Site Name: Stone Motor Hotel  
 Address: 383 South Stone Avenue  
 City, ST, ZIP: Tucson AZ 85701  
 Client: Cam Sensa  
 EDR Inquiry: 3926630.3  
 Order Date: 1/14/2014 8:33:00 AM  
 Certification #: 655E-45B1-8301  
 Copyright: 1947



As can be seen in this 1947 fire insurance assessment of the area the residential housing units have been demolished and the Motor Lodge as we see it today has been constructed. This kind of map review also provides excellent adjacent and adjoining property use information for which we have made full use.

Aerial confirmations contained in Section V, Appendix "B" also support the development time line and we were able to view aerials taken in 1970 forward to confirm the site condition and apparent uses. Using extensive aerial archives available for this area we found the site development clearly records a static development condition with the site essentially unchanged from the 1<sup>st</sup> aerial to the point at which we see it today (Section V, Appendix "B).

Transaction details were not readily available from Pima County, but the site was considered to be undeveloped prior to 1941 with the exception of 2 residential units each of about 900 ft.<sup>2</sup> according to tax records. We suspect the site was part on an urban renewal project which cleared dilapidated structures. Topographic reference mapping studies were also available from 1905 (Section V, Appendix "C"). Our primary purpose in this review of title and records is to determine if any of the ownership would have been predisposed to use the site for any environmentally sensitive purpose. We know that over the past 73 years (prior to 1941) the site is said to be undeveloped except for 2 residential units on the east of the property. At the time these residential units existed, the property was subdivided. We view this as a support to our opinion that the site has not be used for any potentially sensitive environmental uses. Our information from the City of Tucson and Pima County indicates no development uses were permitted from 1984 (this was the extent of the available record keeping).

The current and past ownership indicate confirmation of the records research that there have been no environmental infractions known at or on the subject site. This title and records research provides about 70 years of past knowledge into site use and conditions and . No current or historical uses of the site have been conducted which might have adverse or lasting environmental implications. The pre-development use of the site was for an investment holding and since about 1941 has been residentially designated as we see it today.

#### *Ownership Summary*

Prior to 1941 the predominance of the site was cleared as shown in the Sanborn Fire Insurance maps aerial. From at least 1941 to current the site has been in commercial residential development, and we know prior to that time there was continued residential use on a portion of the site. The listed ownerships and title transfers indicate no corporate or business use which might have had the interest or show an investment potential for an adverse environmental impact to the site. No ownership history or past uses indicate the potential for an adverse environmental impact. A certified chain-of-title research is not recommended on this site (for environmental review purposes) since all record sources indicate no impact from prior ownership on the site or on adjacent properties and our 40 year chain of title search with Pima County Assessors Office reveals no transaction gaps of suspect uses. Historical Topographic studies were available to 1905 and aerial studies back to 1970 supporting that this and surrounding sites were used for no purpose which posed a threat of site or area contamination.

In performing due diligence an original plat of the site development was obtained from Pima County (page 6) to verify the sitting and scope of this review from the time of first site changes. The County and City records verify the owner and title reviews.

#### 4.4.2 Environmental Liens or Activity and Use Limitations

Our review was centralized to the listed Pima County Assessors office for which the original plat was developed:

Actual or Potential Contamination Records : Motor Hotel APN: 117-14-0930			
NATIONAL PRIORITY LIST (NPL)	no	LEAKING UNDERGROUND TANKS	no
CERCLIS	no	RCRA CORRECTIVE ACTION SITE	no
NFRAP (DELISTED CERCLIS)	no	DOCKETS FACILITIES	no
STATE PRIORITY LIST	no	OPEN DUMPS	no
STATE CLEAN-UP LIST	no	REPORTED SPILL	no

Permits, Registrations & Regulatory Reporting :			
RCRA TSD	no	WASTE WATER DISCHARGE	no
RCRA LQG	no	DRINKING WATER SYSTEM	no
RCRA SQG	no	TSCA (DICIS)	no
RCRA TRANSP	no	PCB HANDLERS	no
AIR EMISSIONS	no	FIFRA (PESTICIDES)	no
SOLID WASTE FACILITIES	no	ABOVEGROUND STORAGE TANKS	no
UNDERGROUND STORAGE TANK	no	EPA FACILITY INDEX (FINDS)	no
TRI REPORTING	no		

**Potential Responsibility at Superfund Sites : Motor Hotel APN: 117-14-0930**  
 Number of PRP Letters Received:  
*The search has determined that the above facility received 0 PRP letters.*  
 Number of Sites Potentially Responsible For:  
*The search has determined that the above facility is responsible for 0 Superfund Sites.*

**Non-Compliance Records :**  
 Number of Times Named as Defendant in an EPA Case:  
*The specified search has found 0 Defendant records from the EPA DOCKETES database.*  
 Number of Emergency Response Spill Release Reports:  
*The search has found 0 spill records for this site.*  
 Total Penalties Assessed:  
*The search has determined that the above facility has had \$0.00 penalties assessed.*  
 Total Penalties Paid:  
*The search has determined that the above facility has paid \$0.00 in penalties.*

Regulation	Total Violations	Total Enforcements	Penalties Assessed	Penalties Paid
RCRA	0	0	\$0.00	\$0.00
OSHA	0	0	\$0.00	\$0.00
CAA	0	0	\$0.00	\$0.00
CWA	0	0	\$0.00	\$0.00
TSCA	0	0	\$0.00	\$0.00
FIFRA	0	0	\$0.00	\$0.00
EPCRA	0	0	\$0.00	\$0.00

No environmental liens or activity use and limitations are known at the subject site. Lien reviews source materials are included in Section V, Appendix "D".

4.4.3 Specialized Knowledge

There is no specialized client knowledge of environmental conditions at this location.

4.4.4. Commonly Known or Reasonably Ascertainable Information

The site is composed of 30 units officially for commercial residential use. First development in about 1941 and currently has 32 units of commercial residential housing on about .51 acres (point 51) of land. The complete subject is secure and in compliance with local codes for access and drainage. There have been no site discoveries that have proved to demonstrate an adverse environmental impact to the subject site presently or in the past. The oldest found permitting record with city of Tucson was a series of reviews conducted in 1970 through 1984. A number of improvements and adjustments were made at the site throughout this period as documented by the city of Tucson. A primary review in these matters is to determine if the use of the building would be anything other than commercial residential in this particular case. No development record for this site would indicate any use other than commercial residential.

10 17 11 093  
1965  
003-0007-0007-501 0150-57  
KIRK HAYNE L & NELLE M UND 2/3 INT & 57  
KIRK JAMES L UND 1/3 INT  
383 S STONE AVE, TUCSON ARIZ  
TUCSON

10 17 11 093  
C-24-84

COMMERCIAL PROPERTY RECORD CARD  
C 7/27 C 4-12-78  
AREA CODE  
0150  
SPECIAL DISTRICT  
BASIS CODE UNITS

Order #84-0607  
Order #68-13341PE

383 S Stone

Change	Land	Improvements	Total	Property	Class	Area and Value	Assessed Value
70		\$ 66894		03	18	40730	23
71	70 TR 100180	20733	87627	03	18	25807	23
72	LAND REVALUED	40730		03	18		
73	PERMITION NG	40730	67765	03	18		
74	PERMITION	745412		03	18	66074	23
75	PERMITION	40730	70818	03	18	72733	23
76	PERMITION	70818		03	18		
77	PERMITION	70818		03	18		
78	PERMITION	70818		03	18		
79	PERMITION	70818		03	18		
80	PERMITION	70818		03	18		
81	PERMITION	70818		03	18		
82	PERMITION	70818		03	18		
83	PERMITION	70818		03	18		
84	PERMITION	70818		03	18		
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90	PERMITION	70818		03	18		
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92	PERMITION	70818		03	18		
93	PERMITION	70818		03	18		
94	PERMITION	70818		03	18		
95	PERMITION	70818		03	18		
96	PERMITION	70818		03	18		
97	PERMITION	70818		03	18		
98	PERMITION	70818		03	18		
99	PERMITION	70818		03	18		
100	PERMITION	70818		03	18		

SUMMARY OF VALUES

Property	Class	Area and Value	Assessed Value
Land	03	40730	23
Buildings and Improvements	03	66074	23
Household Furnishings	16	72733	23
TOTAL VALUE			

SERVICES AND AREA

Off Site Improvements	Unit Size	Zone	Neighborhood
Paved Street	City Water	X	Single Family
Black Topped Street	Well	X	Two Family
Gravelled Street	Sewer	X	Multi Family
Grass/Gravel	Sanitary Tank	X	Business
Public Works	Natural Gas	X	Commercial
Curbs and Gutters	Ceastroop	X	Industrial
Alley	L. P. Gas	X	
No Alley	Electricity	X	

DATE OF APPRAISAL 4/15/16  
MEASURED BY [Signature]  
LISTED BY [Signature]  
PRICED BY [Signature]  
REVIEWED BY [Signature] DATE [Signature]  
POSTED BY [Signature] DATE [Signature]

1972 TR 100180

RES 25 % 1984 X 18 =	1163
COMM 25 % 1984 X 25 =	4970
TOTAL	6133
RES 25 % 1984 X 18 =	5072
COMM 25 % 1984 X 25 =	13637
TOTAL	18709

1985 review for  
Order written 12-28-85  
Order # 1984-160,000

1972 TR 100180

Owner 25% 3375 x 1.45 = 4894  
Owner 25% 2182 x 1.72 = 3753  
Total 75% 10225 x 1.45 = 14826  
Total 75% 6547 x 1.72 = 11261

7/21/78 1/2 - 1/4 A. Thomas  
1970

RES 25 % 1984 X 18 =  
COMM 25 % 1984 X 25 =  
T. S. A. V. 6036 TOTAL  
RES 25 % 1984 X 18 =  
COMM 25 % 1984 X 25 =  
T. S. A. V. TOTAL

1/6-1/12-1/18-1/24-3/1-3/8-3/15-3/22-3/29-4/5-4/12-4/19-4/26-5/3-5/10-5/17-5/24-5/31-6/7-6/14-6/21-6/28-7/5-7/12-7/19-7/26-8/2-8/9-8/16-8/23-8/30-9/6-9/13-9/20-9/27-10/4-10/11-10/18-10/25-11/1-11/8-11/15-11/22-11/29-12/6-12/13-12/20-12/27-1/3-1/10-1/17-1/24-1/31-2/7-2/14-2/21-2/28-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-10/21-10/28-11/4-11/11-11/18-11/25-12/2-12/9-12/16-12/23-12/30-1/6-1/13-1/20-1/27-2/3-2/10-2/17-2/24-2/28-3/7-3/14-3/21-3/28-4/4-4/11-4/18-4/25-5/2-5/9-5/16-5/23-5/30-6/6-6/13-6/20-6/27-7/4-7/11-7/18-7/25-8/1-8/8-8/15-8/22-8/29-9/5-9/12-9/19-9/26-10/3-10/10-10/17-10/24-10/31-11/7-11/14-11/21-11/28-12/5-12/12-12/19-12/26-1/2-1/9-1/16-1/23-1/30-2/6-2/13-2/20-2/27-3/6-3/13-3/20-3/27-4/3-4/10-4/17-4/24-4/30-5/7-5/14-5/21-5/28-6/4-6/11-6/18-6/25-7/2-7/9-7/16-7/23-7/30-8/6-8/13-8/20-8/27-9/3-9/10-9/17-9/24-9/30-10/7-10/14-

Assessors office that no liens or other environmentally related filings have been made which might present an adverse valuation effect.

#### 4.4.6 Owner, Property Manager, and Occupant Information

Review with both the current management representatives South Stone Properties LLC ( Gerald Hawley and Dennis Luttrell are the contact officers) and the historical property holder Larry Naughton (contact Teresa Naughton) who owned the property from the 1970s to 1999 ( selling to Downtown, Inn) there were no discoveries of a site history with any environmental infractions.

Coordinated by the interested buyer, Maryann Beerling met with us on site and arranged to have all units available for access and review including walking reviews of on-site storage. During these reviews no discussions revealed any adverse environmental effects or uses at the subject in our discussions with the current and prior owners it was indicated the site has been residentially positioned since 1971. Mrs. Naughton the owner in 1971 recalls the units going vacant in the 1990s but that was after she had sold the property to Downtown, Inn. These reviews revealed no environmental impacts known at the site after or prior to the site development. Independently interviewed owner representative and prior owner representatives indicate this location has had no prior uses to their knowledge (i.e. residentially developed) and no commercial, industrial or developed uncategorized uses known prior to the commercial residential development. There are no environmental liens, fines or open citations known at the subject. No leasing, sub-leasing or owner uses have been authorized which might be an environmental concern which supports the statements of current and prior owner interests.

#### 4.4.7 Reasons for Performing Phase I

This is preliminary discovery of site liabilities in advance of the refinancing and the continued use of the site as a commercial residential development by Compass Affordable Housing and/or Bethel Development. The Phase I is being used as part of the determination as to site investment feasibility and to provide indemnification to the owner, developer and any investors should a latent environmental impact be discovered.

#### 4.4.8 Other

NA

## SECTION III RECORDS REVIEW

### 4.5.1 Standard Environmental Record Sources

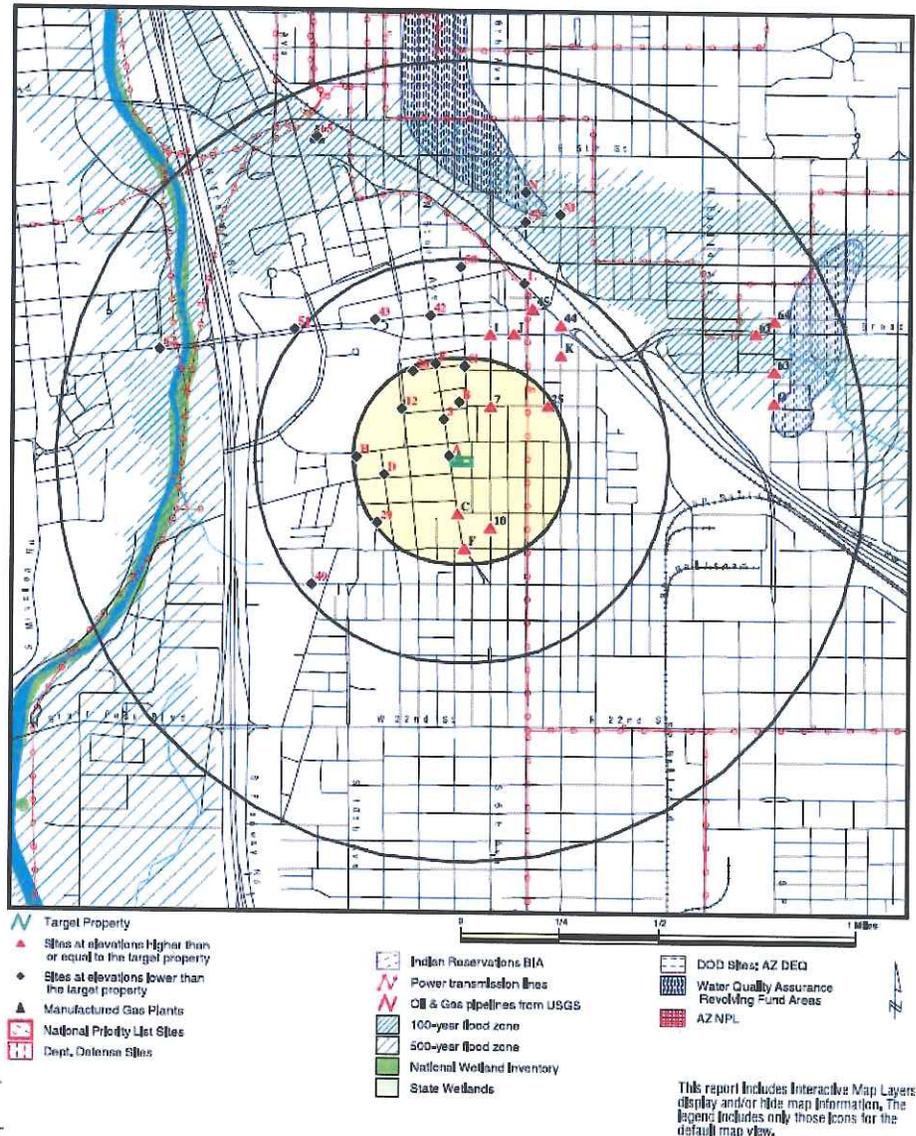
Section V, Appendix "A" provides the Standard Environmental Record Sources review.

### 4.5.2 Additional Environmental Record Sources

An environmental database report was obtained for the subject property, which indicated that the Resource Conservation and Recovery Information System (RCRIS) database mapping showed discoveries nearby the subject site (within 1 mile). These findings are mapped at right and full mapping is in Section V, Appendix "A". The site is represented by the green star and box.

The map at right is a reduced map view of the study for hazards in relation to the subject property.

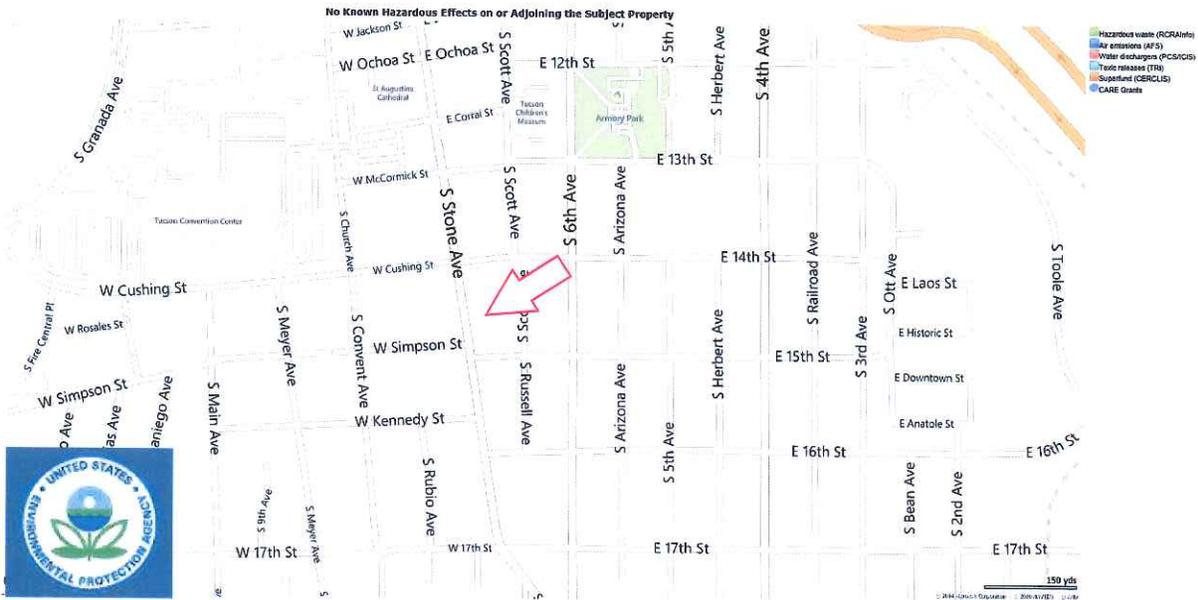
The subject is generally represented by the green star and box in the center of the yellow zone radius marker. This yellow radius is the critical area of potential impacts, and as can be seen there are multiple registered environmental effect discoveries (red and black triangles) in the shaded area surrounding the subject.



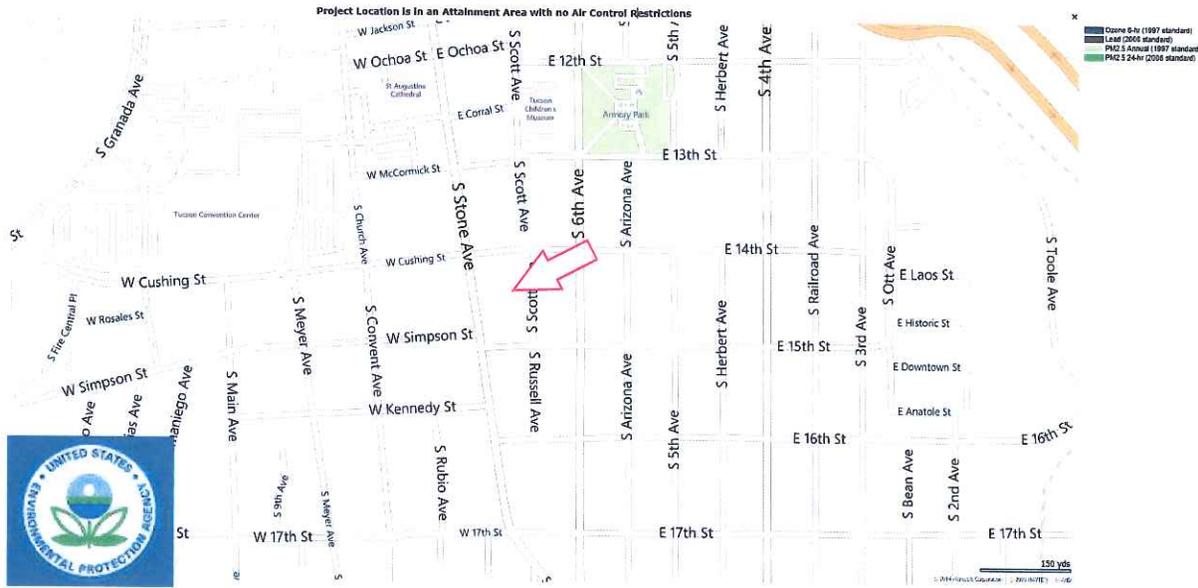
This report includes Interactive Map Layers display and/or hide map information. The legend includes only those icons for the default map view.

Because of findings from the standard study a combined assessment was also ordered from the HUD and EPA environmental impact system. This scope of this review was more broadly defined and incorporates EPA assessments with HUD standards. Area impacts are mapped below with subject identified generally by the star and box:

This mapped review is from EPA and ADEQ resources showing no adverse effects in the area of the subject.



Additional reviews were also made into Air Quality restrictions for the area and as indicated in the assessment below there are no restrictions for this area.



No EPA/ADEQ (ADEQ is the Arizona Department of Environmental Quality) area registrations were considered to be violations for the adjacent area and as indicated by the EPA area mapping no sites (including the subject) were found to have any adverse environmental implications. EPA or ADEQ registers no National Priority List designations adjacent or contiguous with the subject.

Additional sources were contacted relative to records discovery and to solicit independent knowledge of local officials.

#### Websites Referenced

ADEQ GIS eMaps Database - <http://gisweb.azdeq.gov/website/emaps/tpd/ust/>  
Arizona National Wetlands Inventory – [www.nps.gov/rivers.html](http://www.nps.gov/rivers.html)  
City of Tucson Fire Department – [www.Tucson.gov/fire](http://www.Tucson.gov/fire)  
City of Tucson Human Services Department – [www.Tucson.gov/humanservices](http://www.Tucson.gov/humanservices)  
City of Tucson Development Services Department – [www.Tucson.gov/CITYCODE/ch032.html](http://www.Tucson.gov/CITYCODE/ch032.html)  
City of Tucson Parks Department - [www.Tucson.gov/parks/parks.html](http://www.Tucson.gov/parks/parks.html)  
City of Tucson Police Department – [www.Tucson.gov/police/](http://www.Tucson.gov/police/)  
City of Tucson Zoning Map – [Tucson.gov/PLANNING/zonmaps.html](http://Tucson.gov/PLANNING/zonmaps.html)  
EPA OTIS online GIS database – [www.epa-otis.gov/cgi-bin/ideaotis.cgi](http://www.epa-otis.gov/cgi-bin/ideaotis.cgi)  
Federal Emergency Management Agency – [www.fema.gov](http://www.fema.gov)  
Google Maps – <http://maps.google.com/>  
Pima County Assessor – [www.Pima.gov/assessor/gis/map.html](http://www.Pima.gov/assessor/gis/map.html)  
Natural Resources Conservation Service - <http://websoilsurvey.nrcs.usda.gov/app/>  
Right-to-Know Database – [www.rtk.net](http://www.rtk.net)  
Sole Source Aquifers - [www.epa.gov/region09/water/groundwater/ssa.html](http://www.epa.gov/region09/water/groundwater/ssa.html)  
U.S. Census Bureau – <http://factfinder.census.gov>  
U.S. Environmental Protection Agency – [www.epa.gov/enviro/html/em/](http://www.epa.gov/enviro/html/em/)  
Valley Metro – [www.valleymetro.org](http://www.valleymetro.org)  
Wild and Scenic Rivers – [www.fs.fed.us/r3/coconino/recreation/red\\_rock/verde-river-boat.shtml](http://www.fs.fed.us/r3/coconino/recreation/red_rock/verde-river-boat.shtml)  
and [www.rivers.gov/wildriverslist.html#az](http://www.rivers.gov/wildriverslist.html#az)

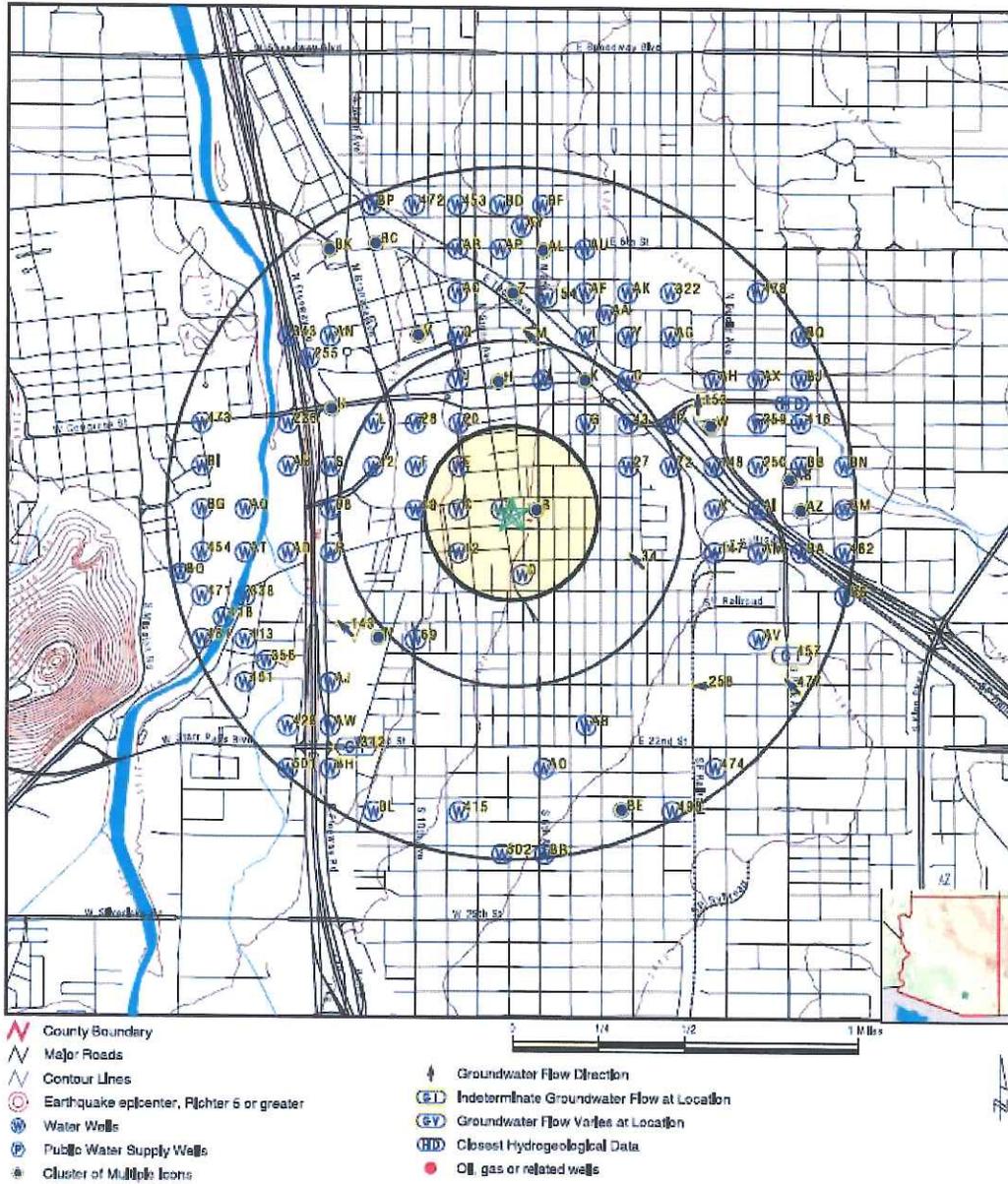
#### Maps Referenced

City of Tucson Fire Department - District Battalion Map  
City of Tucson General Plan Land Use Map  
City of Tucson Parks Department - Parks and Facilities Map  
City of Tucson – Tucson Maps Online map printout  
City of Tucson Street Transportation Department 2005 Average Weekday Traffic, Major Traffic Flow Map.  
EPA Enviromapper - Percent below Poverty Map  
EPA Enviromapper - Persons per Square Mile Map  
EPA Enviromapper - Percent Minority Map  
FEMA - Flood Insurance Rate Map dated September 30, 2005  
Natural Resources Conservation Service Soil Maps  
Tucson Sky Harbor International Airport - Airport Layout Plan November 2005  
US National Seismic Hazard Map  
Wide World of Maps Tucson Metropolitan Street Atlas 2010 edition

We had many contacts to directors offices which resulted in transfer to other appropriate records holders but all contacts provided comments which confirmed no record of environmental infractions known or reflected in any municipal recordkeeping at or adjacent to the subject. A full list of site contacts is provided with this report.

#### 4.5.3 Physical Setting Source(s)

Section V, Appendix "A" provides the Physical Setting Sources along with the Standard Environmental Record Sources review. The map below is a reduced map of that found in Appendix "A". No adverse impacts were discovered with a critical radius of the subject (yellow shading).



The physical setting review is important because well testing will reveal any water table contaminations and the overall site condition relative to environmental impacts. This review is expanded upon in Section IV but, well testing did not reveal a ground water or water run-off effect for the subject or adjacent/contiguous subject area.

#### 4.5.4 & 4.5.5 Historical Use Information on the Property & Historical Use Information on the Adjoining Properties

Our reviews have included a standard historical aerial review and topographic review (Section V Appendix "B") in addition to examination of land use records at the Pima County Assessors office and consulting business directories including city, cross reference and telephone directories, at approximately five year intervals for the years spanning 1920 through 2001. (These years are not necessarily inclusive.) A summary of the information obtained is provided below. This report compiles information by geocoding the subject properties (that is, plotting the latitude and longitude for such subject properties and obtaining data concerning properties within 1/8th of a mile of the subject properties). There is no warranty or guarantee that geocoding will report or list all properties within the specified radius and accordingly, some properties within the aforementioned radius and the information concerning those properties may not be referenced in this report.

The following is site summary listings just for the subject which are detailed in Section V. Of significance is that use reports support the vacant and unused nature of the subject since 1920 when records were first kept for this area.

#### **References**

To meet the prior use requirements of ASTM E 1527-05, Section 8.3.2, the following *standard historical sources* may be used: aerial photographs, fire insurance maps, property tax files, land title records (although these cannot be the sole historical source consulted), topographic maps, city directories, building department records, or zoning/land use records. ASTM E 1527-05, Section 8.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. ASTM E 1527-05 requires "All obvious uses of the property shall be identified from the present, back to the property's first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary and both reasonably ascertainable and likely to be useful." (ASTM E 1527-05, Section 8.3.2) Reasonably ascertainable means information that is publicly available, obtainable from a source within reasonable time and cost constraints, and practically reviewable.

EPA's Standards and Practices for All Appropriate Inquiries (AAI), Section § 312.24, identifies the historical sources of information necessary to achieve the objectives and performance factors of § 312.20. According to AAI, "historical documents and records may include, but are not limited to, aerial photographs, fire insurance maps, building department records, chain of title documents, and land use records."

#### **Data Gaps**

In order to address data gaps, additional sources of information may be consulted. According to the AAI, Section § 312.20 (g), "to the extent there are data gaps (as defined in § 312.10) in the information developed...that affect the ability of persons (including the environmental professional) conducting the all appropriate inquiries to identify conditions indicative of releases or threatened releases...such persons should identify such data gaps, identify the sources of information consulted to address such data gaps, and comment upon the significance of such data gaps." According to ASTM E 1527-05, Section 8.3.2.3, "historical research is complete when either: (1) the objectives in 8.3.1 through 8.3.2.2 are achieved; or (2) data failure is encountered. Data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met...if data failure is encountered, the report shall document the failure and, if any of the standard historical sources were excluded, give the reasons for their exclusion."

The historical and current uses of the subject and adjacent sites are documented in Section V Appendix "C" but even a finding of "no coverage" or limited findings of historical information for this review is revealing. We are looking for past uses in materials of publication sources such as phone books, business licenses and other common listing documents. This is done by examination of the name and affiliation of the contact sources now surrounding the subject. If for example the source indicated an auto repair facility or dry cleaners, there would be ample cause for additional examination for potential unforeseen environmental effects. There were no suspect listing in the above indexes searched and all uses were found to be residential in nature.

Through the use of the above review ownership types can be examined and for those types which could have environmental impacts additional site reviews can be conducted. During examinations of locations and properties there were no historical uses which appear to create any condition of adverse environmental concern for the subject property.

As a result of the adjacent site information a walking survey and randomly available tenant/occupant information was gathered. The properties are identified from the following Pima County list (at right and on the next page) which specifically identifies the parcel location for all adjacent and nearby properties to the subject:

**RESEARCH SUMMARY**

The following research sources were consulted in the preparation of this report. An "X" indicates where information was identified in the source and provided in this report.

<u>Year</u>	<u>Source</u>	<u>TP</u>	<u>Adjoining</u>	<u>Text Abstract</u>
2006	Hill-Donnelly Information Services	X	X	X
2001	Hill-Donnelly Information Services	X	X	X
1993	U S West Direct	-	-	-
1987	Mountain Bell A U S West Co.	-	X	X
1985	US WEST DIRECT	-	-	-
1982	R. L. Polk Co.	-	X	X
1979	R. L. Polk & Co.	-	-	-
1977	R. L. Polk & Co.	-	X	X
1970	The Mountain States Telephone and Telegraph Co.	-	X	X
1968	R. L. Polk & Co.	-	X	X
1965	Mountain States Telephone & Telegraph Co.	-	X	X
1964	R. L. Polk & Co.	-	X	X
1960	Mullin-Kille Co.	-	-	-
1955	Mullin-Kille Co.	-	X	X
1952	Mullin - Kille Company and Baldwin ConSurvey	-	-	-
1950	The Baldwin and Mullin-Kille Co.	-	X	X
1947	Southside Directory Co.	-	-	-
1945	Phoenix Directory Co	-	-	-
1940	Arizona Directory Co.	-	-	-
1935	Arizona Directory Co.	-	-	-
1930	Arizona Directory Co.	-	-	-
1925	Arizona Directory	-	-	-
1920	Arizona Directory	-	-	-

CITY OF TUCSON

00000  
 Parcel 117-14-085A [Detail information.](#)  
**Situs (property) address**  
 Situs (property) address Jurisdiction Postal City Zip Code  
 408 S 6TH AV TUCSON TUCSON 85701

WINGED FOOT INVESTMENT SVCS LP LLLP 50% & JHR INVESTMENTS SVCS LP LLLP 50%  
 PO BOX 41041  
 TUCSON AZ 85717-1041  
 Parcel 117-14-0860 [Detail information.](#)  
**Situs (property) address**  
 Situs (property) address Jurisdiction Postal City Zip Code  
 40 E 14TH ST TUCSON TUCSON 85701

WINGED FOOT INVESTMENT SVCS LP LLLP 50% & JHR INVESTMENTS SVCS LP LLLP 50%  
 PO BOX 41041  
 TUCSON AZ 85717-1041  
 Parcel 117-14-0890 [Detail information.](#)  
**Situs (property) address**  
 Situs (property) address Jurisdiction Postal City Zip Code  
 375 S STONE AV TUCSON TUCSON 85701

LA FRONTERA CENTER INC  
 502 W 29TH ST  
 TUCSON AZ 85713-3353  
 Parcel 117-14-090A [Detail information.](#)  
**Situs (property) address**  
 Situs (property) address Jurisdiction Postal City Zip Code  
 410 S 6TH AV TUCSON TUCSON 85701

385 STONE LLC  
 2525 E BROADWAY BLVD STE 200  
 TUCSON AZ 85716-5350  
 Parcel 117-14-0940 [Detail information.](#)  
**Situs (property) address**  
 Situs (property) address Jurisdiction Postal City Zip Code  
 385 S STONE AV TUCSON TUCSON 85701

FIRST FEDERAL CREDIT UNION  
25 S ARIZONA PL STE 111  
CHANDLER AZ 85225-5537  
Parcel 117-14-1030 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code  
340 S STONE AV TUCSON TUCSON [85701](#)

ARIZONA TERRITORIAL LANDS LLC  
373 S MEYER AVE  
TUCSON AZ 85701-2231  
Parcel 117-14-1040 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code  
376 S STONE AV TUCSON TUCSON [85701](#)

WOMANKRAFT  
388 S STONE AVE  
TUCSON AZ 85701  
Parcel 117-14-1200 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code  
388 S STONE AV TUCSON TUCSON [85701](#)

GYURKO LANIN A  
396 S STONE UNIT 7  
TUCSON AZ 85701  
Parcel 117-14-1210 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code  
396 S STONE AV TUCSON TUCSON [85701](#)

KRISTEDJA TIMOTHY  
2477 WALNUT AVE  
VENICE CA 90291-5018  
Parcel 117-14-4450 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code

DORM AT THE ACADEMY LOFTS CONDOMINIUM  
(FOR GIS PURPOSES ONLY)  
. 00000  
Parcel 117-14-4520 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code  
420 S 6TH AV TUCSON TUCSON [85701](#)

ACADEMY LOFTS LLC  
6700 N ORACLE RD STE 504  
TUCSON AZ 85704-7736  
Parcel 117-14-4540 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code

ACADEMY LOFTS LLC  
6700 N ORACLE RD STE 504  
TUCSON AZ 85704-7736  
Parcel 117-14-4620 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code

ACADEMY LOFTS LLC  
6700 N ORACLE RD STE 504  
TUCSON AZ 85704-7736  
Parcel 117-14-4700 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code

ACADEMY LOFTS LLC  
(FOR GIS PURPOSE ONLY)  
6700 N ORACLE RD STE 233  
TUCSON AZ 85704-7737  
Parcel 117-14-4780 [Detail information.](#)  
**Situs (property) address**  
Situs (property) address Jurisdiction Postal City Zip Code  
460 S 6TH AV TUCSON TUCSON [85701](#)

All of the above sites were reviewed by walking the site and in some cases speaking impromptu with persons who were available. Other reviews of adjacent housing north of the subject were visual and confirmed the mixed residential services and residential occupancy of the area. 100% of all contiguous properties were site walked and reviewed. None of these reviews revealed any logically deduced or the potential for environmental threat or past problems at the subject or contiguous to the subject which might have adverse environmental implications.

The historical site use of the subject for this study was residentially developed since 1941. All residential and public uses adjacent to our subject were found to be of no apparent environmental concern to the subject and also were discovered to be of a previous long standing residential or open area heritage. Confirmations other than walking site reviews were made through EPA, ADEQ and National databases to discover any less apparent environmental infractions. Our reviews and status of these sites are included in Section IV findings.

## 4.6 Site Reconnaissance

### 4.6.1 Methodology and Limiting Conditions

Current and historical land use activities at the subject property and surrounding properties were evaluated by reviews with local officials and site visits of the unmapped or unplotable sites identified by our Site Assessment Section V, Appendix "A". Sanborn Fire Insurance Maps are commonly used to validate local and other sources and this site provided a wealth of information from Sanborn maps dating from 1901 through a series of updates through 1968. This series of reviews are included in Section V, Appendix "C". Tucson aerials and standard topo maps are also included and provided excellent confirmation of historical uses and site details. The aerials indicate no negative impact in site development since 1970 and topo graphic studies were available to 1905 (when topo mapping was first done for this area), historical uses studied provide no suggestion of additional unregistered negative environmental impacts other than the known and mapped findings of this assessment.

On November 11, 13 and 20, 2014 and follow up reviews for environmental assessment December 29, 2014, January 21, 2015 and most recently on April 24, 2015 by CSI personnel who conducted site specific inspections of the subject property and surrounding sites to assess the presence of visible, potentially adverse environmental conditions as part of this Phase I ESA. In the picture at right is a typical view of the entry access to the residentially developed area of the subject and typical of the fully developed grounds at the subject.



During the survey, observations were recorded and photographs obtained to clearly demonstrate the existing condition of the subject property as well as surrounding and adjacent areas. Soil was inspected for areas which were found to be loose, mounded or soils stained with any hidden problems or chemical contaminants. The soil was probed to 3 feet where loose or mounded soil was discovered or soft depressions were found such as the depression in the photo at right.

During site reviews initial surveys were completed of the area of study at the subject starting at the north and performing site walks in 30 foot grid patterns to cover the entire location. Once

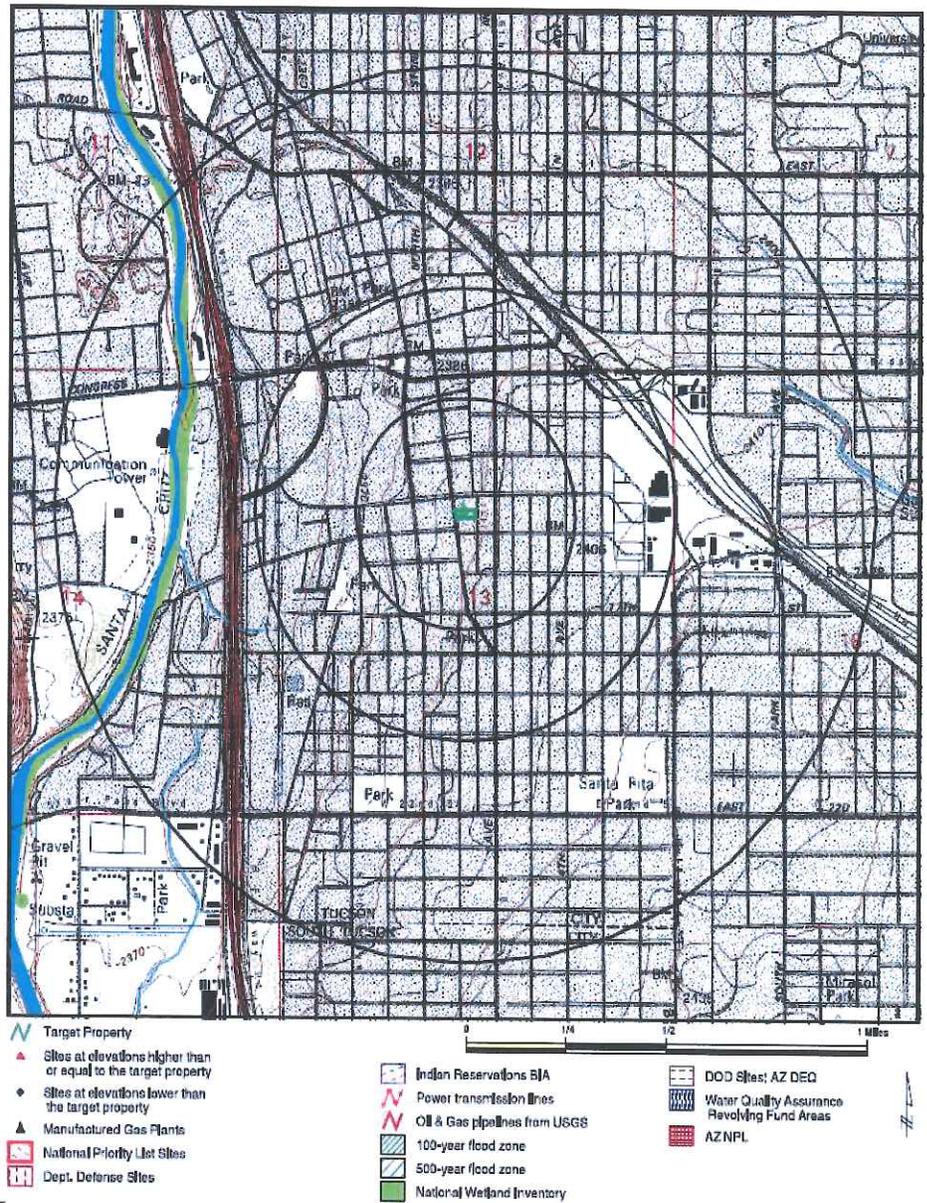
site reviews were completed a process of site walks were conducted for about 1,000 feet around the subject (outside known boundaries) to study adjacent uses and to target discussions with adjacent occupancy with persons of opportunity. Findings are all characterized in Section IV

#### 4.6.2 General Site Setting

The subject property is commonly considered to be fully developed and no areas of the site would be considered undeveloped or available for new construction of residential units. The site is well maintained with full access to operational public infrastructure. The site has small amounts of debris only in approved disposal areas and as can be seen in photos is generally clean in every appearance with site vegetation management near the residential buildings. Generally the vegetation can be characterized as cultivated and matched to the growth requirements of the region. The vegetation is lush and cultivated near all existing residential housing.

During site reviews there was no noted staining of the soil at the subject property or on adjacent lots which would indicate leaching or dumping of chemicals. The lot is generally sloping but no severe gullies, cliffs or washes.

Topographic coverage of the subject property is provided by the U.S. Geological Quadrangle Map for Tucson (33110-B8 Tucson, Arizona, USGS 7.5 min quad index, 1992). The subject property is at an approximate elevation of 2,397 feet. Topography is mixed at the site, with general slope to the west northwest.



Water flows to the west on the developed site overall due to drainage and parking area contour with surface drainage from the subject property into culverts and washes to storm drain run-off designed along the fronting Stone Avenue and ultimately into water retention areas designed and developed by the City of Tucson. The site elevation profiles were developed during the on-site reviews.

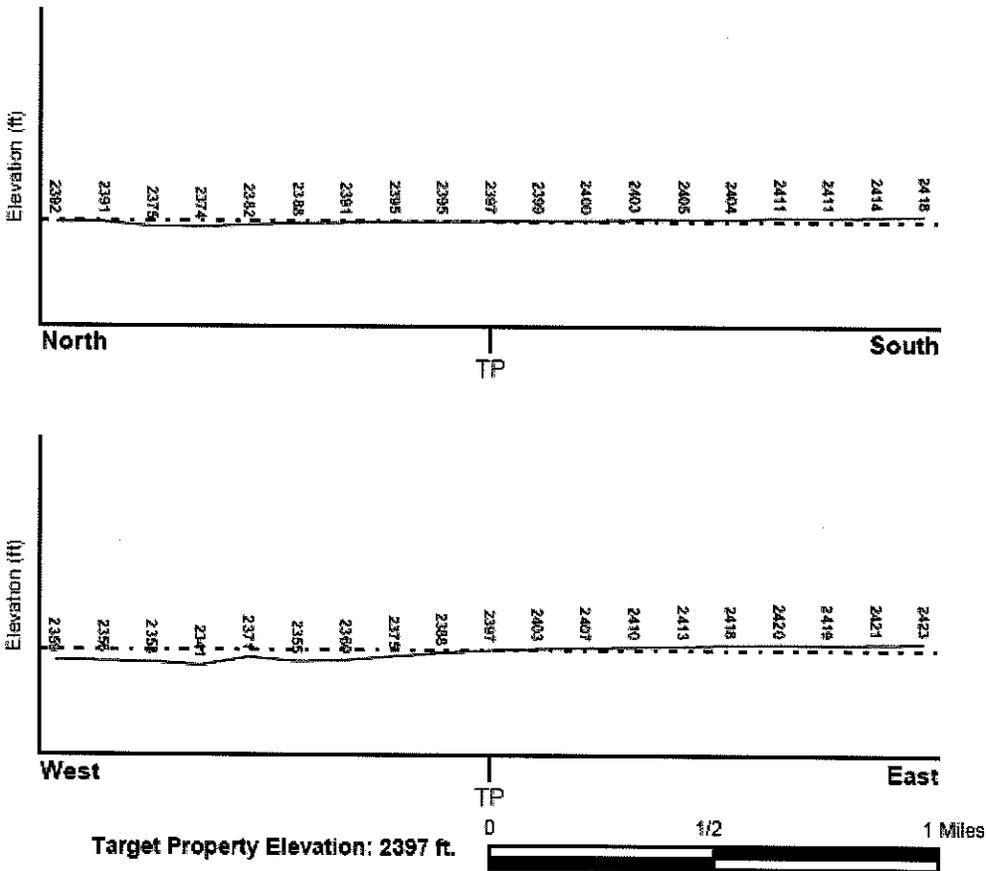
**TOPOGRAPHIC INFORMATION**

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.]

**TARGET PROPERTY TOPOGRAPHY**

General Topographic Gradient: General WNW

**SURROUNDING TOPOGRAPHY: ELEVATION PROFILES**

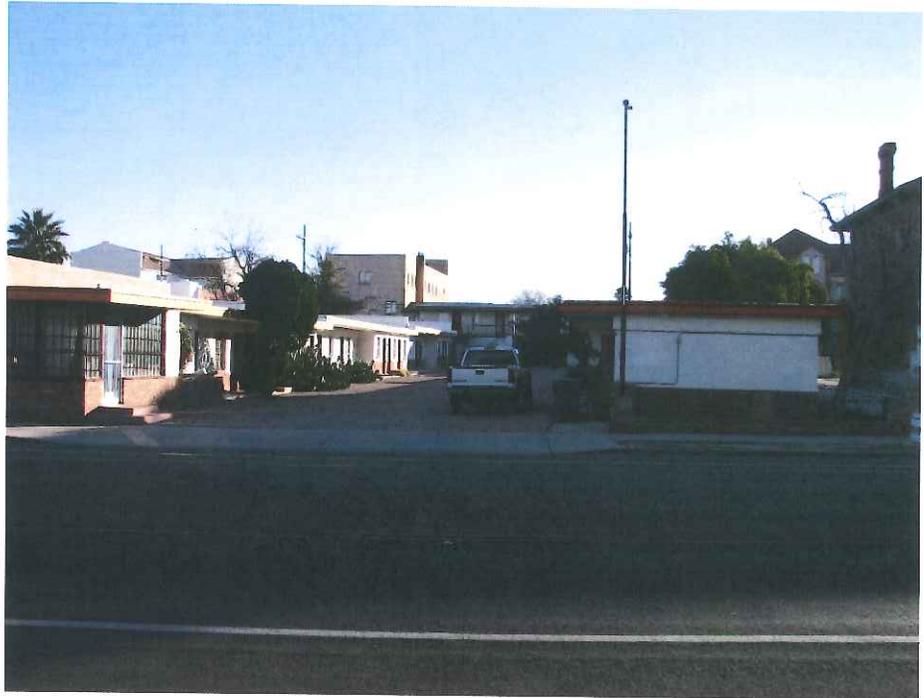


Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

Regional groundwater flow is in a southwesterly direction and the depth of groundwater is approximately 650 feet below ground surface (bgs). The geology in the general vicinity of the subject property consists of very gravelly fine sandy loam with moderate infiltration rates. Soils are considered moderately corrosive and there are no hydric soils in the area. Depth to bedrock is more than 60 inches in this location. The subject as seen in the pictures is fully developed no notable geologic features on the site. The topographic study of the location is provided on page 27 of this study.

#### 4.6.3 Exterior Observations

During the survey, observations were recorded and photographs obtained to clearly demonstrate the existing condition of the subject property as well as surrounding and adjacent areas. Soil was inspected for areas which were found to be loose, mounded or soils stained with any hidden problems or chemical contaminants. There were virtually no areas that were not paved other than designed beds for plants adjacent to existing structures. The soil was probed where loose or mounded soil was discovered or soft depressions were found, but none of the suspect areas were of any consequence and completely solid (no hidden trash or debris). No significant rubbish was found on the site and no chemically induced vegetation controls were seen on the site.



The developed commercial residential site has only basic amenities with rock walls, side walks and curb and gutter. The intended commercial residential use of the building has been abandoned for more than a few years.

No significant uncontrolled debris was seen around the site and no evidence of any dumping of material which has long term environmental effects to the subject.

The management has a practice of “holding” materials for dumping or disposal in the complex courtyard or the vacant rooms. There is no unwanted collections of bulk material in any open areas. No chemicals or residue of any type was found on the subject.

All debris seen on the site was household rubbish and none could be considered industrial or hazardous dumping. We conducted a careful examination for septic fields and storage tanks on the site. There are no signs of any septic or field drainage lines at the site.

The designated parking areas at the site were studied for excess petroleum products and abandoned vehicles. No abandoned vehicles were noted and traffic areas showed no petroleum product run-off of any kind. Site research confirmed no citations or registrations of an environmental concern were associated with this property. Police records from 2009 to date indicate there have been 3 abandoned vehicle removals from the site in that time to date and none were registered as an environmental



nuisance or fire hazards. All aspects of the subject were considered secured, orderly and modestly maintained around the developed commercial residential buildings. There was no evidence of any potential of adverse environmental impact.

All area utilities are pole mounted and are placed on public right-of-way. The distribution lines in the area are all residential and under 240 KW. Typical transformers for residential distribution are seen in the area and upgraded electronic distribution transformers are being phased in to use.

Arizona Department of Environmental Protection (ADEQ) has no records of operational transformers that are known to remain in the this area of Tucson that contain polychlorinated biphenyl compounds (PCB). Transformers were examined for any staining in units including nearby neighborhoods and all transformer units seen within 1 mile of the subject appear new or are stamped

with a date of 2008 or later. The picture at right is a view down the alleyway adjoining the subject and forming the Eastern boundary to the property . Utility right-of-way does no does not adjoin the subject but is about 30 feet further east.



#### 4. 4 Interior Observations

the entire complex could be considered as storage. In this regard our review was specific to any potentially hazardous material storage. Focus was made for all bulk storage materials. The room storage at right was typical of all units. Although in disuse we found typical residential storage of standard paper products and dry goods. Storage in all areas was examined. And no areas were off-limits to our interior conditions assessment on November 11, 2014.



On-site storage discoveries can all be characterized as dry goods, abandoned mechanical and some electronic items.



A theme noted as repeating in all of the units was a mix of boxed storage and scattered material from prior use.

A part of our review includes observations for mold and other potentially adverse effects aside from the obvious hazardous chemical storage. We could detect no unusual odors that might be suspect of hazardous chemicals and no visual or odor indicating hidden damp areas of mold growth.

Even the on site manager/security apartment had marginal facilities for habitation.



In discussions with the on site manager during site reviews and as a result of observations we found no signs of hazardous chemical spills or cleanup.

No storage of any significant volume (cannister or drum storage) was found in any location at the site.

General chemical storage needs were seen in apartments for small 1 gallon latex paint products, and some smaller containers a powerful cleaning agents such as turpentine and rubbing alcohol. There was no bulk storage of any kind found at the site.



Our focus in these storage area reviews was on the complex used storage (for potentially high volume volatile storage) and while we did sample some of the residentially available storage both inside and outside the apartments these areas would be unlikely to have any hazardous

storage and as seen in the photo despite disuse this entire complex remains designed for residential occupancy uses not alternative storage.

#### 4.7 Interviews

##### 4.7.1 Interview with Owner Representative & Knowledgeable Staff

Review with both the current management representatives South Stone Properties LLC ( Gerald Hawley and Dennis Luttrell are the contact officers) and the historical property holder Larry Naughton (contact Teresa Naughton) who owned the property from the 1970s to 1999 ( selling to Downtown, Inn) there were no discoveries of a site history with any environmental infractions.

Coordinated by the interested buyer, Maryann Beerling met with us on site and arranged to have all units available for access and review including walking reviews of on-site storage. During these reviews no discussions revealed any adverse environmental effects or uses at the subject in our discussions with the current and prior owners it was indicated the site has been residentially positioned since 1971. Mrs. Naughton the owner in 1971 recalls the units going vacant in the 1990s but that was after she had sold the property to Downtown, Inn. These reviews revealed no environmental impacts known at the site after or prior to the site development. Independently interviewed owner representative and prior owner representatives indicate this location has had no prior uses to their knowledge (i.e. residentially developed) and no commercial, industrial or developed uncategorized uses known prior to the commercial residential development. There are no environmental liens, fines or open citations known at the subject. No leasing, sub-leasing or owner uses have been authorized which might be an environmental concern which supports the statements of current and prior owner interests.

The following questions were able to be answered from the reviews of the owner/representatives and prior ownership:

### **To Assure Client Liability Protection Each Question Has Been Responded to by the Property Owner and Management**

**(1.) Environmental cleanup liens that are filed or recorded against the site (40 CFR 312.25).**  
Are you aware of any environmental cleanup liens against the *property* that are filed or recorded under federal, tribal, state or local law?

Response: None

**(2.) Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry (40 CFR 312.26).**  
Are you aware of any AULs, such as *engineering controls*, land use restrictions or *institutional controls* that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law?

Response: None

**(3.) Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).**

As the *user* of this *ESA* do you have any specialized knowledge or experience related to the *property* or nearby properties? For example, are you involved in the same line of business as the current or former *occupants* of the *property* or an adjoining *property* so that you would have specialized knowledge of the chemicals and processes used by this type of business?

Response: None

**(4.) Relationship of the purchase price to the fair market value of the *property* if it were not contaminated (40 CFR 312.29).**

Does the purchase price being paid for this *property* reasonably reflect the fair market value of the *property*? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the *property*?

Response: There are no adjustments to the valuation of this property as a result of any environmental conditions. There are clear adjustments established for the physical site condition that are not environmentally related.

**(5.) Commonly known or *reasonably ascertainable* information about the *property* (40 CFR 312.30).**

Are you aware of commonly known or *reasonably ascertainable* information about the *property* that would help the *environmental professional* to identify conditions indicative of releases or threatened releases? For example, as *user*,

(a.) Do you know the past uses of the *property*?

Response: Yes, residentially developed for at least the last 70 years and recently being held for disposition as a vacant building and with minimum on-site maintenance. The structure was built in 1941, and the essential site as we see it today (footprint, not necessarily the facade) is the same as the original construction.

(b.) Do you know of specific chemicals that are present or once were present at the *property*?

Response: None

(c.) Do you know of spills or other chemical releases that have taken place at the *property*?

Response: None

(d.) Do you know of any environmental cleanups that have taken place at the *property*?

Response: None

**(6.) The degree of obviousness of the presence of likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).**

As the *user* of this *ESA*, based on your knowledge and experience related to the *property* are there any *obvious* indicators that point to the presence or likely presence of contamination at the *property*?

Response: None

4.7.2 Interview with Site Manager/Owners

Review with both the current management representatives South Stone Properties LLC ( Gerald Hawley and Dennis Luttrell are the contact officers) and the historical property holder Larry Naughton (contact Teresa Naughton) who owned the property from the 1970s to 1999 ( selling to Downtown, Inn) there were no discoveries of a site history with any environmental infractions.

Coordinated by the interested buyer, Maryann Beerling met with us on site and arranged to have all units available for access and review including walking reviews of on-site storage. During these reviews no discussions revealed any adverse environmental effects or uses at the subject in our discussions with the current and prior owners it was indicated the site has been residentially positioned since 1971. Mrs. Naughton the owner in 1971 recalls the units going vacant in the 1990s but that was after she had sold the property to Downtown, Inn. These reviews revealed no environmental impacts known at the site after or prior to the site development. Independently interviewed owner representative and prior owner representatives indicate this location has had no prior uses to their knowledge (i.e. residentially developed) and no commercial, industrial or developed uncategorized uses known prior to the commercial residential development. There are no environmental liens, fines or open citations known at the subject. No leasing, sub-leasing or owner uses have been authorized which might be an environmental concern which supports the statements of current and prior owner interests.

4.7.3 Interviews with Occupants

Not applicable to this site. Reviews were conducted with site management overseeing the residential housing maintenance and site. This site would be considered unoccupied.

Interviews with Local Government

Websites Referenced

ADEQ GIS eMaps Database - <http://gisweb.azdeq.gov/website/emaps/tpd/ust/>

Arizona National Wetlands Inventory – [www.nps.gov/rivers.html](http://www.nps.gov/rivers.html)

City of Tucson Fire Department – [www.Tucson.gov/fire](http://www.Tucson.gov/fire)

City of Tucson Human Services Department – [www.Tucson.gov/humanservices](http://www.Tucson.gov/humanservices)  
City of Tucson Development Services Department – [www.Tucson.gov/CITYCODE/ch032.html](http://www.Tucson.gov/CITYCODE/ch032.html)  
City of Tucson Parks Department - [www.Tucson.gov/parks/parks.html](http://www.Tucson.gov/parks/parks.html)  
City of Tucson Police Department – [www.Tucson.gov/police/](http://www.Tucson.gov/police/)  
City of Tucson Zoning Map – [Tucson.gov/PLANNING/zonmaps.html](http://Tucson.gov/PLANNING/zonmaps.html)  
EPA OTIS online GIS database – [www.epa-otis.gov/cgi-bin/ideaotis.cgi](http://www.epa-otis.gov/cgi-bin/ideaotis.cgi)  
Federal Emergency Management Agency – [www.fema.gov](http://www.fema.gov)  
Google Maps – <http://maps.google.com/>  
Pima County Assessor – [www.Pima.gov/assessor/gis/map.html](http://www.Pima.gov/assessor/gis/map.html)  
Natural Resources Conservation Service - <http://websoilsurvey.nrcs.usda.gov/app/>  
Right-to-Know Database – [www.rtk.net](http://www.rtk.net)  
Sole Source Aquifers - [www.epa.gov/region09/water/groundwater/ssa.html](http://www.epa.gov/region09/water/groundwater/ssa.html)  
U.S. Census Bureau – <http://factfinder.census.gov>  
U.S. Environmental Protection Agency – [www.epa.gov/enviro/html/em/](http://www.epa.gov/enviro/html/em/)  
Valley Metro – [www.valleymetro.org](http://www.valleymetro.org)  
Wild and Scenic Rivers – [www.fs.fed.us/r3/coconino/recreation/red\\_rock/verde-river-boat.shtml](http://www.fs.fed.us/r3/coconino/recreation/red_rock/verde-river-boat.shtml)  
and [www.rivers.gov/wildriverslist.html#az](http://www.rivers.gov/wildriverslist.html#az)

#### Maps Referenced

City of Tucson Fire Department - District Battalion Map  
City of Tucson General Plan Land Use Map  
City of Tucson Parks Department - Parks and Facilities Map  
City of Tucson – Tucson Maps Online map printout  
City of Tucson Street Transportation Department 2005 Average Weekday Traffic, Major Traffic Flow Map.  
EPA Enviromapper - Percent below Poverty Map  
EPA Enviromapper - Persons per Square Mile Map  
EPA Enviromapper - Percent Minority Map  
FEMA - Flood Insurance Rate Map dated September 30, 2005  
Natural Resources Conservation Service Soil Maps  
Tucson Sky Harbor International Airport - Airport Layout Plan November 2005  
US National Seismic Hazard Map  
Wide World of Maps Tucson Metropolitan Street Atlas 2010 edition

We had many contacts to directors offices which resulted in transfer to other appropriate records holders but all contacts provided comments which confirmed no record of environmental infractions known or reflected in any municipal recordkeeping at or adjacent to the subject. A full list of site contacts is provided with this report.

#### 4.7.5 Interviews with Others

No interviews or discussions with others beyond those referenced in section 4.7.4 have been conducted.

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## SECTION IV FINDINGS, OPINIONS, CONCLUSIONS

### 4.8 Findings

Hazardous Waste/Substances/Materials

Standard Environmental Database Report Section V, Appendix "A"

Subject Property

Governmental databases were searched using EDR - Environmental Data Resources, INC. Environmental Risk Information regarding the subject property. It should be noted that these databases cover a time span primarily subsequent to May, 2015. Not all waste sites or spills may be indicated in these databases if they existed or occurred prior to the initialization of the database, and/or have not been included on the governmental databases. As this material becomes dated, the databases will become less reliable. Reviews included:

**US EPA DATA** - Environmental impact noted for the Subject within 1 mile

National Priority List (NPL)/Superfund Sites

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Sites

Emergency Response Notifications System (ERNS) Sites

Hazardous Material Spills

Resource Conservation and Recovery Act (RCRA) Treatment, Storage and/or Disposal Facilities

No Further Remedial Action Planned Sites (NFRAP)

RCRA Large/Small Quantity Generators (RCRA LQG/SQG)

RCRA Subtitle D Landfills

**State Data** - Sites were analyzed for both the subject and adjacent properties with no findings

Arizona Municipal Solid Waste Facilities (SWF)

Arizona Hazardous Waste Sites (HWS)

Registered Underground Storage Tanks (LRSTs)

Leaking Underground Storage Tanks (LUSTs)

**US EPA Data** (within ASTM Search Radius of 1/4 mile) -

**State of Arizona Data**

*The most recent database search for all of the above sources did discover locations which could have potentially adverse impact for the subject. None of the sources in this review indicated an adverse impact on the subject site. The sites with potentially adverse environmental findings all mapped and easily located. These sites were closely evaluated by walking survey, for any possible liability which could be extended to the subject. These locations are identified under Section V, Appendix "A" of this assessment.*

The following is an expanded abbreviation listing from the reviews indicated in the following summary of assessments for this site:

**Federal Delisted NPL site list**

Delisted NPL..... National Priority List Deletions

**Federal CERCLIS list**

CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System

**Federal CERCLIS NFRAP site List**

CERC-NFRAP..... CERCLIS No Further Remedial Action Planned

**Federal RCRA CORRACTS facilities list**

CORRACTS..... Corrective Action Report

**Federal RCRA non-CORRACTS TSD facilities list**

RCRA-TSDF..... RCRA - Transporters, Storage and Disposal

**Federal RCRA generators list**

RCRA-LQG..... RCRA - Large Quantity Generators

RCRA-SQG..... RCRA - Small Quantity Generators

RCRA-CESQG..... RCRA - Conditionally Exempt Small Quantity Generator

**Federal institutional controls / engineering controls registries**

US ENG CONTROLS..... Engineering Controls Sites List

US INST CONTROL..... Sites with Institutional Controls

**Federal ERNS list**

ERNS..... Emergency Response Notification System

**State- and tribal - equivalent NPL**

AZ WQARF..... Water Quality Assurance Revolving Fund Sites

**State- and tribal - equivalent CERCLIS**

SPL..... Superfund Program List

SHWS..... ZipAcids List

**State and tribal landfill and/or solid waste disposal site lists**

SWF/LF..... Directory of Solid Waste Facilities

**State and tribal leaking storage tank lists**

LUST..... Leaking Underground Storage Tank Listing

INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

**State and tribal registered storage tank lists**

UST..... Underground Storage Tank Listing  
AST..... List of Aboveground Storage Tanks  
INDIAN UST..... Underground Storage Tanks on Indian Land

**State and tribal institutional control / engineering control registries**

AUL..... DEUR Database  
AZURITE..... Remediation and DEUR/DEMUR Tracking System

**State and tribal voluntary cleanup sites**

INDIAN VCP..... Voluntary Cleanup Priority Listing  
VCP..... Voluntary Remediation Program Sites

**State and tribal Brownfields sites**

BROWNFIELDS..... Brownfields Tracking System

**ADDITIONAL ENVIRONMENTAL RECORDS**

**Local Brownfield lists**

US BROWNFIELDS..... A Listing of Brownfields Sites

**Local Lists of Landfill / Solid Waste Disposal Sites**

DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations  
ODL..... Open Dump Inventory  
SWTIRE..... Solid Waste Tire Facilities  
INDIAN ODL..... Report on the Status of Open Dumps on Indian Lands

**Local Lists of Hazardous waste / Contaminated Sites**

US CDL..... Clandestine Drug Labs  
AOCONGERN..... Superfund GIS Information  
CDL..... Clandestine Drug Labs

**Local Land Records**

LIENS 2..... CERCLA Lien Information  
LUCIS..... Land Use Control Information System

**Records of Emergency Release Reports**

HMIRS..... Hazardous Materials Information Reporting System  
SPILLS..... Hazardous Material Logbook

**Other Ascertainable Records**

RCRA-NonGen..... RCRA - Non Generators  
DOT OPS..... Incident and Accident Data

The following is a summary list of reviewed assessments from all research in this report. The absence of area environmental impacts is supportive of our conclusion that this site is not impacted by adverse environmental effects:

**STANDARD ENVIRONMENTAL RECORDS**

**Federal CERCLIS NFRAP site List**

CERC-NFRAP: Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

A review of the CERC-NFRAP list, as provided by EDR, and dated 04/26/2013 has revealed that there is 1 CERC-NFRAP site within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
DESCALE-IT PRODUCTS CO.	127 S. 4TH AVE.	NE 1/4 - 1/2 (0.343 mi.)

**State- and tribal - equivalent NPL**

AZ WQARF: Water Quality Assurance Revolving Fund. Sites which may have an actual or potential impact upon the waters of the State, caused by hazardous substances. The WQARF program provides matching funds to political subdivisions and other State agencies for clean-up activities.

A review of the AZ WQARF list, as provided by EDR, and dated 07/01/2012 has revealed that there are 2 AZ WQARF sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
7TH STREET & ARIZONA AVENUE		NNE 1/2 - 1 (0.632 mi.)
PARK-EUCLID		E 1/2 - 1 (0.771 mi.)

**State- and tribal - equivalent CERCLIS**

SPL: The list is representative of the sites and potential sites within the jurisdiction of the Superfund Program Section. It is comprised of the following elements: 1) Water Quality Assurance Revolving Fund Registry Sites; 2) Potential WQARF Registry sites; 3) NPL sites; and 4) Department of Defense sites requiring SPS oversight.

A review of the SPL list, as provided by EDR, and dated 08/25/2004 has revealed that there are 2 SPL sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
7TH STREET & ARIZONA AVENUE		NNE 1/2 - 1 (0.632 mi.)
PARK-EUCLID		E 1/2 - 1 (0.771 mi.)

SHWS: The State Hazardous Waste Sites records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. The data come from the Department of Environmental Quality's ZipAcids database.

A review of the SHWS list, as provided by EDR, and dated 01/03/2000 has revealed that there are 18 SHWS sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
Not reported	BROADWAY ROAD AND 6TH AVE	NNE 1/4 - 1/2 (0.314 mi.)
Not reported	201 E. BROADWAY	NNE 1/4 - 1/2 (0.340 mi.)
Not reported	127 S. 4TH AVE.	NE 1/4 - 1/2 (0.343 mi.)
Not reported	301 S. PARK	E 1/2 - 1 (0.776 mi.)
Not reported	300 SOUTH PARK	E 1/2 - 1 (0.778 mi.)
BROADWAY VOLVO USED CARS	948 EAST BROADWAY	ENE 1/2 - 1 (0.785 mi.)
BUILDING AND LUMBER SUPPLY	200-276 SOUTH PARK	ENE 1/2 - 1 (0.797 mi.)
Not reported	10-38 NORTH PARK AVENUE	ENE 1/2 - 1 (0.841 mi.)

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
Not reported	(MAIL) PIMA COUNTY DEQ,	NNW 1/4 - 1/2 (0.398 mi.)
Not reported	400 EAST TOOLE AVENUE	NNE 1/4 - 1/2 (0.457 mi.)
PIONEER PAINT & VARNISH CO - F	438 W CONGRESS ST	NW 1/2 - 1 (0.512 mi.)
DOWNTOWN AUTO CENTER	330 N 5TH AVE	NNE 1/2 - 1 (0.609 mi.)

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
<i>Not reported</i>	<b>335 N.4TH AVENUE</b>	<b>NNE 1/2 - 1 (0.653 mi.)</b>
ENTRADA DE ORO PLAZA SHOPPING		NNE 1/2 - 1 (0.678 mi.)
DAVIS MONTHAN AFB ILS OM ANNEX		NNE 1/2 - 1 (0.678 mi.)
WILMOT NATIONAL GUARD TARGET R		NNE 1/2 - 1 (0.678 mi.)
OLIVER'S CLEANERS	<b>300 E 7TH ST</b>	<b>NNE 1/2 - 1 (0.684 mi.)</b>
<i>Not reported</i>	<b>700 CONGRESS ST.</b>	<b>WNW 1/2 - 1 (0.786 mi.)</b>

**State and tribal leaking storage tank lists**

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Environmental Quality's LUST File Listing by Zip Code.

A review of the LUST list, as provided by EDR, and dated 12/24/2013 has revealed that there are 8 LUST sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
<b>MOBIL</b> Date Closed: 05/27/97	<b>142 S 6TH AVE</b>	<b>NNE 1/4 - 1/2 (0.275 mi.)</b>
<b>RICH RODGERS SOUTH INC PROPERTY</b> Date Closed: 09/30/03	<b>151 E BROADWAY BLVD</b>	<b>NNE 1/4 - 1/2 (0.330 mi.)</b>
<b>DESERT SKYLINE PROPERTIES</b> <b>CITY OF TUCSON - RONSTADT BUS</b> Date Closed: 12/28/92	<b>201 E BROADWAY BLVD</b> <b>315 E CONGRESS ST</b>	<b>NNE 1/4 - 1/2 (0.341 mi.)</b> <b>NNE 1/4 - 1/2 (0.406 mi.)</b>

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
<b>CITY OF TUCSON - POLICE/FIRE F</b> <b>BANK ONE ARIZONA</b> Date Closed: 05/11/97	<b>260 S STONE AVE</b> <b>2 E CONGRESS ST</b>	<b>NNW 0 - 1/8 (0.099 mi.)</b> <b>NNW 1/4 - 1/2 (0.362 mi.)</b>
<b>CITY OF TUCSON - WEST 18TH ST</b> Date Closed: 04/30/99 Date Closed: 11/30/93	<b>510 W 18TH ST</b>	<b>SW 1/4 - 1/2 (0.469 mi.)</b>
<b>TANNER MOTOR TOURS - FORMER</b> Date Closed: 05/08/97	<b>139 N SCOTT AVE</b>	<b>N 1/4 - 1/2 (0.480 mi.)</b>

**State and tribal registered storage tank lists**

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Environmental Quality's Arizona UST-DMS Facility and Tank Data Listing by City database.

A review of the UST list, as provided by EDR, and dated 11/05/2013 has revealed that there are 3 UST sites within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
<b>CITY OF TUCSON - POLICE/FIRE F</b> Closure Type: Perm Removal	<b>260 S STONE AVE</b>	<b>NNW 0 - 1/8 (0.099 mi.)</b>

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
BRING FUNERAL HOME INC Closure Type: Perm Removal	236 S SCOTT AVE	N 1/8 - 1/4 (0.140 mi.)
TUCSON COMMUNITY CENTER PARKIN Closure Type: Perm Removal	333 S MAIN AVE	W 1/8 - 1/4 (0.241 mi.)

**State and tribal institutional control / engineering control registries**

AZURITE: ADEQ maintains a repository listing sites remediated under programs administered by the department.

A review of the AZURITE list, as provided by EDR, and dated 07/05/2013 has revealed that there is 1 AZURITE site within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
SOUTHERN PACIFIC RAILROAD - DO	405 N TOOLE AVE	NNE 1/4 - 1/2 (0.456 mi.)

**State and tribal voluntary cleanup sites**

VCP: Sites involved in the Voluntary Remediation Program..

A review of the VCP list, as provided by EDR, and dated 07/16/2013 has revealed that there are 2 VCP sites within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
TUCSON CONVENTION CENTER	280 S CHURCH AVENUE	NW 1/8 - 1/4 (0.175 mi.)
UNION PACIFIC RAILROAD PASSENG	400 E TOOLE AVE	NNE 1/4 - 1/2 (0.457 mi.)

**ADDITIONAL ENVIRONMENTAL RECORDS**

**Local Brownfield lists**

US BROWNFIELDS: The EPA's listing of Brownfields properties from the Cleanups in My Community program, which provides information on Brownfields properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

A review of the US BROWNFIELDS list, as provided by EDR, and dated 09/24/2013 has revealed that there are 3 US BROWNFIELDS sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
GREYHOUND BUS DEPOT	2 SOUTH 4TH AVENUE	NE 1/4 - 1/2 (0.405 mi.)
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
MARIST COLLEGE 515 N. 9TH AVENUE	64 W. OCHOA 515 N. 9TH AVENUE	NNW 1/8 - 1/4 (0.239 mi.) SW 1/8 - 1/4 (0.241 mi.)

Included in our assessment is a study of prior businesses which are no longer in operation but might typically pose a potential for hazardous environmental effects. These reviews can be significant information toward meeting due diligence standards especially when a structure such as the Motor Lodge is more than 50 years of age.

**EDR HIGH RISK HISTORICAL RECORDS**

***EDR Exclusive Records***

EDR MGP: The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

A review of the EDR MGP list, as provided by EDR, has revealed that there is 1 EDR MGP site within approximately 1 mile of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
TUCSON GAS WORKS	W 6TH STREET	NNW 1/2 - 1 (0.679 mi.)

EDR US Hist Auto Stat: EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

A review of the EDR US Hist Auto Stat list, as provided by EDR, has revealed that there are 22 EDR US Hist Auto Stat sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
HANK S ARIZ SERV STA	526 S STONE	S 0 - 1/8 (0.124 mi.)
MIKE S MALCO MOTOR SERVICE	526 S STONE AV	S 1/8 - 1/4 (0.126 mi.)
HARPER M C	301 S 8TH AVE	NNE 1/8 - 1/4 (0.138 mi.)
BUTCHER SERV STA	601 S STONE AVE	S 1/8 - 1/4 (0.161 mi.)
DEAN	701 S STONE AVE	S 1/8 - 1/4 (0.212 mi.)
LANTZ TEXACO SERV	702 S STONE	S 1/8 - 1/4 (0.215 mi.)
GRANDLE RDL HAAS ZIP	702 S STONE AVE	S 1/8 - 1/4 (0.215 mi.)
Not reported	222 E 13TH ST	ENE 1/8 - 1/4 (0.234 mi.)

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
ROBLES SERVICE STATION	389 S MEYER AV	WSW 1/8 - 1/4 (0.174 mi.)
ROBLES SERV STA	389 S MEYER	WSW 1/8 - 1/4 (0.175 mi.)
LAOS	389 S MEYER ST	WSW 1/8 - 1/4 (0.175 mi.)
LA CONCHA SERVICE STATION	415 S MEYER ST	WSW 1/8 - 1/4 (0.177 mi.)
PETE S RADIATOR & BODY WORKS	170 S STONE AVE	NNW 1/8 - 1/4 (0.211 mi.)
BREWSTER S	141 S STONE AVE	NNW 1/8 - 1/4 (0.217 mi.)
STANDARD STATIONS INC	141 S SCOTT	N 1/8 - 1/4 (0.226 mi.)
SPANGLER V V	15 E OCHOA	NNW 1/8 - 1/4 (0.230 mi.)
SANTA RITA	135 S SCOTT	N 1/8 - 1/4 (0.230 mi.)
DOBBIN S CHAS RICHFIELD SERV	146 S STONE	NNW 1/8 - 1/4 (0.240 mi.)

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
BYERS SERV STA	148 S STONE AVE	NNW 1/8 - 1/4 (0.241 mi.)
SOUTH MAIN GARAGE	404 S MAIN ST	W 1/8 - 1/4 (0.244 mi.)
SOUTH MAIN GARAGE	404 S MAIN	W 1/8 - 1/4 (0.244 mi.)
SOUTH MAIN GARAGE	404 S MAIN AVE	W 1/8 - 1/4 (0.245 mi.)

EDR US Hist Cleaners: EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

A review of the EDR US Hist Cleaners list, as provided by EDR, has revealed that there are 5 EDR US Hist Cleaners sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
PIONEER CLNRS & DYERS	281 S SCOTT	N 0 - 1/8 (0.107 mi.)
EXPERT CLNRS & LDYR	641 S 8TH AV	SSE 1/8 - 1/4 (0.167 mi.)
HICKS JOSEPHINE MRS	41 W 17TH ST	S 1/8 - 1/4 (0.212 mi.)
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
UNITED CLNRS	340 S STONE	WNW 0 - 1/8 (0.007 mi.)
UNITED CINRS	340 S STONE AVE	WNW 0 - 1/8 (0.008 mi.)

#### EDR RECOVERED GOVERNMENT ARCHIVES

##### *Exclusive Recovered Govt. Archives*

RGA HWS: The EDR Recovered Government Archive State Hazardous Waste database provides a list of SHWS incidents derived from historical databases and includes many records that no longer appear in current government lists.

A review of the RGA HWS list, as provided by EDR, has revealed that there are 16 RGA HWS sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
<i>Not reported</i>	BROADWAY ROAD AND 6TH AVE	1/4 - 1/2 (0.314 mi.)
<i>Not reported</i>	201 E. BROADWAY	NNE 1/4 - 1/2 (0.340 mi.)
<i>Not reported</i>	127 S. 4TH AVE.	NE 1/4 - 1/2 (0.343 mi.)
<i>Not reported</i>	301 S. PARK	E 1/2 - 1 (0.778 mi.)
<i>Not reported</i>	300 SOUTH PARK	E 1/2 - 1 (0.778 mi.)
BROADWAY VOLVO USED CARS	948 EAST BROADWAY	ENE 1/2 - 1 (0.785 mi.)
BUILDING AND LUMBER SUPPLY	200-276 SOUTH PARK	ENE 1/2 - 1 (0.797 mi.)
<i>Not reported</i>	10-38 NORTH PARK AVENUE	ENE 1/2 - 1 (0.841 mi.)
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>
<i>Not reported</i>	(MAIL) PIMA COUNTY DEQ,	NNW 1/4 - 1/2 (0.398 mi.)

**Lower Elevation**

Not reported  
**PIONEER PAINT & VARNISH CO - F**  
**DOWNTOWN AUTO CENTER**  
 Not reported  
 Not reported  
**OLIVER'S CLEANERS**  
 Not reported

**Address**

**400 EAST TOOLE AVENUE**  
**438 W CONGRESS ST**  
**330 N 5TH AVE**  
**335 N.4TH AVENUE**  
**335 N. 4TH AVENUE**  
**300 E 7TH ST**  
**700 CONGRESS ST.**

**Direction / Distance**

**NNE 1/4 - 1/2 (0.457 mi.)**  
**NW 1/2 - 1 (0.512 mi.)**  
**NNE 1/2 - 1 (0.609 mi.)**  
**NNE 1/2 - 1 (0.653 mi.)**  
**NNE 1/2 - 1 (0.653 mi.)**  
**NNE 1/2 - 1 (0.684 mi.)**  
**WNW 1/2 - 1 (0.786 mi.)**

RGA LUST: The EDR Recovered Government Archive Leaking Underground Storage Tank database provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists.

A review of the RGA LUST list, as provided by EDR, has revealed that there are 9 RGA LUST sites within approximately 0.5 miles of the target property.

**Equal/Higher Elevation**

**MOBIL**  
**RICH RODGERS SOUTH INC PROPERT**  
**DESERT SKYLINE PROPERTIES**  
**ADOT / PROPERTY**  
**CITY OF TUCSON - RONSTADT BUS**

**Address**

**142 S 6TH AVE**  
**151 E BROADWAY BLVD**  
**201 E BROADWAY BLVD**  
**121 S 4TH AVE**  
**315 E CONGRESS ST**

**Direction / Distance**

**NNE 1/4 - 1/2 (0.275 mi.)**  
**NNE 1/4 - 1/2 (0.330 mi.)**  
**NNE 1/4 - 1/2 (0.341 mi.)**  
**NE 1/4 - 1/2 (0.345 mi.)**  
**NNE 1/4 - 1/2 (0.406 mi.)**

**Lower Elevation**

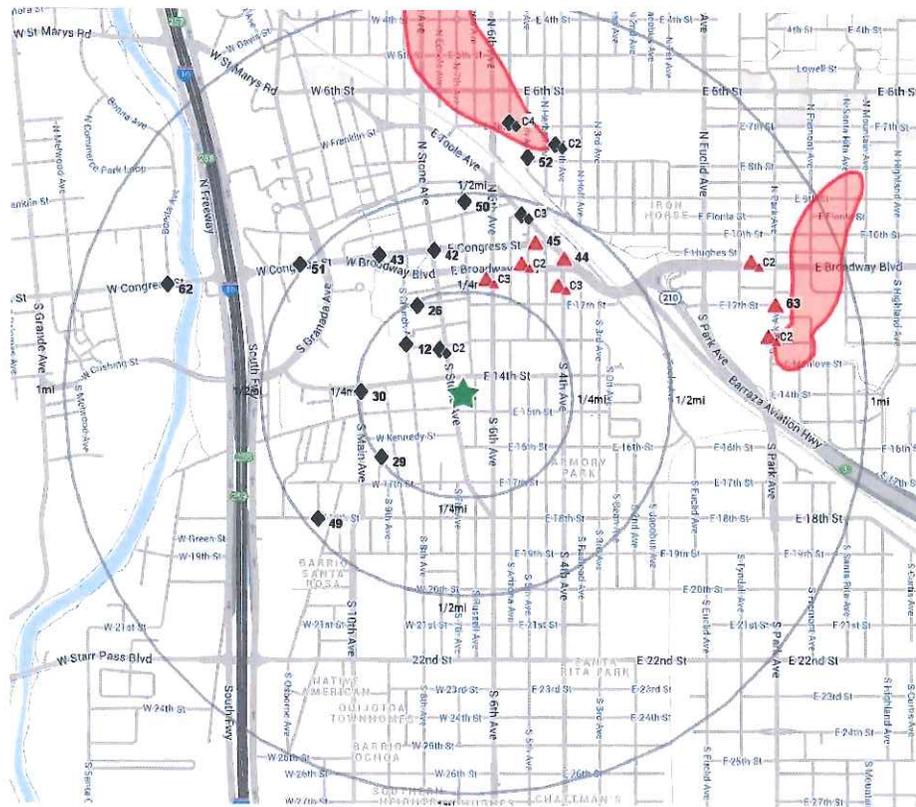
**CITY OF TUCSON - POLICE/FIRE F**  
**BANK ONE ARIZONA**  
**CITY OF TUCSON - WEST 18TH ST**  
**TANNER MOTOR TOURS - FORMER**

**Address**

**260 S STONE AVE**  
**2 E CONGRESS ST**  
**510 W 18TH ST**  
**139 N SCOTT AVE**

**Direction / Distance**

**NNW 0 - 1/8 (0.099 mi.)**  
**NNW 1/4 - 1/2 (0.362 mi.)**  
**SW 1/4 - 1/2 (0.468 mi.)**  
**N 1/4 - 1/2 (0.480 mi.)**



Our reviews have documented that the primary concern as the WQARF sites that are indicated by the red shading on the prior page mapping. Our primary contact for this review has been Robert Wallin, ADEQ Project Manager (520- 628-6743) relative to the 7<sup>th</sup> Street and Arizona Avenue environmental registration. Delfina Alvarez, is the ADEQ Community Involvement Coordinator (602-771-4710). Documentation is available for this review element at the Southern Regional office of ADEQ at 400 West Congress Suite 433. The 7<sup>th</sup> Street and Arizona Avenue site is located in downtown Tucson North of Broadway Boulevard and east of Interstate 10. ADEQ has completed drinking water well inventory tests which are related to the water well study that we have provided in this review. The nearest known drinking water wells outside of the red shaded regions show no known signs of contamination; however, ADEQ project management has indicated there is a concern if on-site water wells are considered as the primary drinking source when City of Tucson public water services are available. This effect was discovered in 1957 and relates to dry-cleaning businesses that were located at about 300 E. 7<sup>th</sup> St. The building was destroyed by fire in 1989 but there was a significant release of Tetrachloroethene (PCE) and Trichloroethene (TCE) which is the cause for concern. As the current status update in October and No in October 5 nested soil gas probes into underwater monitoring wells were sampled for soil gas. In May 2012, groundwater samples were collected from 28 wells and soil vapor samples were collected from 19 wells from an area which included the entire shaded area in the map. Testing revealed no Soil Remediation Levels were exceeded for contaminations of concern.

In a related review with the same ADEQ project management team, Park-Euclid site also shaded in red on the map was assessed for the potential of contamination to our subject. This site is slightly different from the contamination source, which is the Mission Uniform and Linen Service, locally known as "Mission Linen". This is the same basic chemical composition that was a concern with the dry-cleaning spill. Discovered in 1995 the risk factors are considered more occupational on-site health issues. ADEQ documents indicate migration of chemicals through Brown sources do not pose a significant risk to current or future off-site residential uses. Once again the provision and remediation would be to utilize city provided water services and utilities and to restrict on site private wells.

A file search was made of the US EPA and ADEQ to check for available file information on the subject property or other facilities that may not have been included in the database search as part of this report's due diligence. The US EPA has no additional records or information for properties or facilities regarding conditions which could impact or have adversely impacted the subject property. The EPA and ADEQ documentation have no indicators which suggest problems at or adjacent to the subject. File searches were also conducted with the U.S. Department of Housing and Urban Development who provides a coordination of several agencies. The combined mapping resource from EPA and ADEQ is included in this review in Section II page 24 and indicates no additional findings of potential adverse impact to the subject. These additional reviews are conducted to exhaust all publically accessible and readily available information sources that might lead to an environmental condition which should be investigated relative to the subject site liability. All of our findings listed above were specifically site

reviewed and we found no pending environmental conditions at any of the site which could have a potential effect now or in the foreseeable future on the subject.

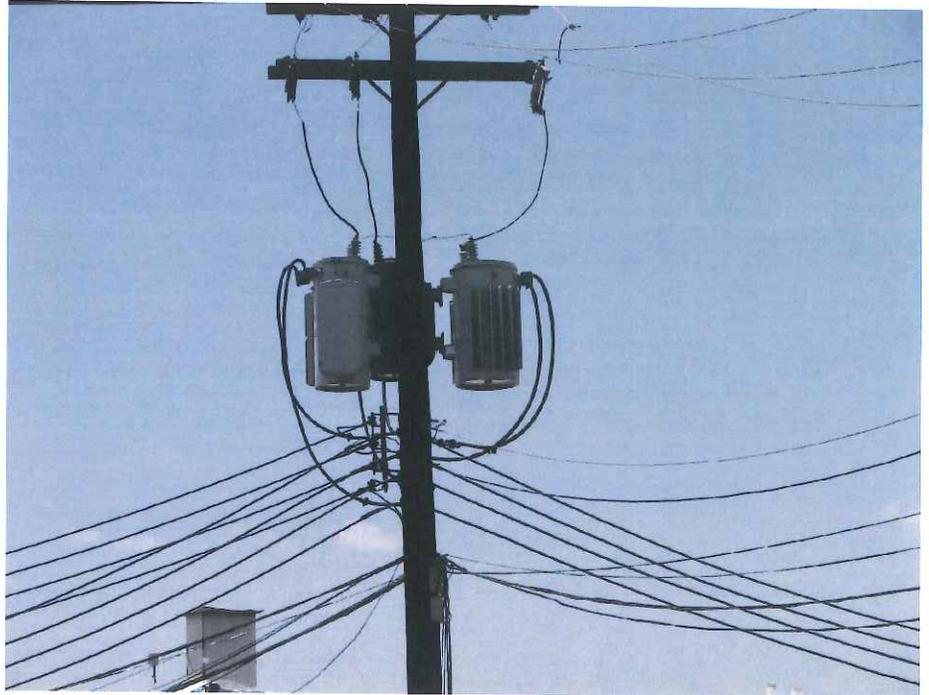
Findings - Key Assessments for this site:

Toxic Substances Control Act (TSCA)

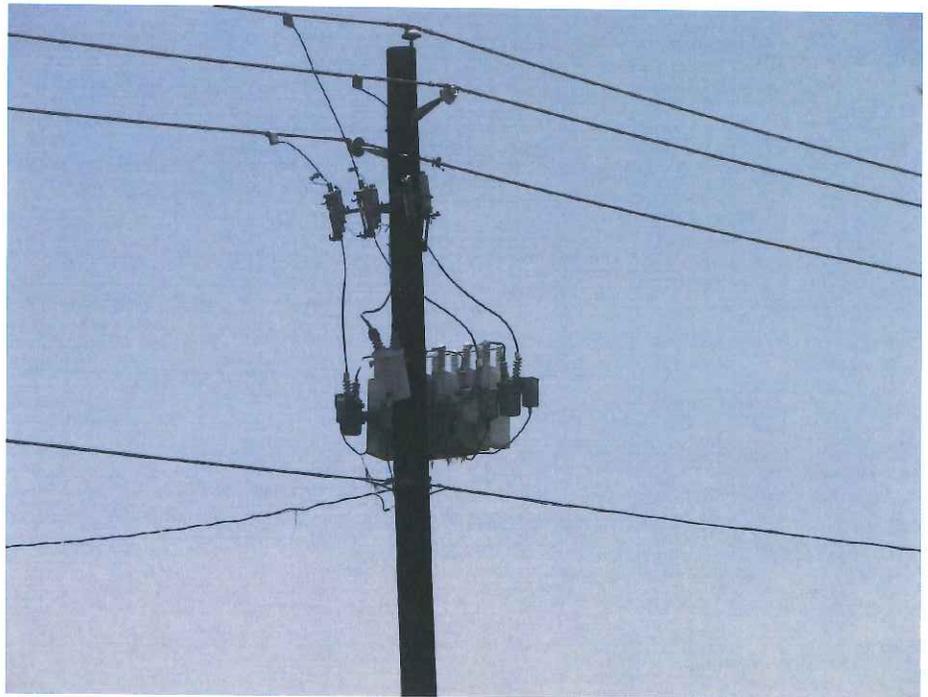
#### Subject Property

Power lines are all on public right-of-way placements for the most part in this area. A few locations adjacent to the subject have placed underground utilities in this area, but pole mounted units are evident for about ½ mile in all directions from this location. Transformers were not present on the subject only on designated public utility locations. The underground lines are residential transmission lines and not high voltage distribution lines as are the pole mounted units. In the area relay stations for are in place and transistor based.

The area transmission is residential voltages (approximately less than 240 KV) and not high voltage regulators. Regulators like the one servicing the site and pictured in the photo above contain no PCB's.



More typical of area transmission units are the transistorized updates seen in the area as pictured at right. Again these units do not contain any PCB's which is our environmental concern.



#### Adjacent Areas

A transformer station was noted near I-1) and Saint Mary's Road Avenue about 3 miles northwest of the subject, but this distance presents no environmental issues for the subject.

#### Arizona Department of Environmental Protection (ADEQ) has no records of

operational transformers that are known to remain in the this area of Tucson/Pima County that contain polychlorinated biphenyl compounds (PCB). Our examination of all nearby transformers (about 1 mile from the subject) showed relatively new units with no signs of leakage or heat damage.

#### Air Quality

As determined by records review (Section V, Appendix "A") and discussions with the ADEQ, the subject property currently has no operations in effect that could result in a compromise of the State of Arizona Air Quality Regulations. (Subject generally identified with a red box in the air quality review on page 24.)

#### Solid Waste

Solid waste as it would be generated at the subject property would be required to be contained and removed on a regular basis by the Tucson Sanitation service. Dumping bins and sanitation plans are established for this area in compliance with Pima County Sanitation Codes and any debris collection outside of approved containers is considered litter and/or illegal dumping. No debris of any environmental concern was found during site reviews.

A literature search was conducted for historical landfills, both through the environmental database search and through requests to the US EPA and ADEQ. The database search indicated that no reported Federal or State landfills are present within specified ASTM standard search radii of the subject property which present an impact. A registered landfill lift-station for

Tucson/Pima County was located more than five miles distant from the subject and a water treatment plant about 1 mile northwest of the subject. These have no known impacts on the subject property.

**Radon/Radiation**

The US EPA and Center for Disease Control have used a continuous radon exposure level of four picocuries per liter (pCi/L) as a limit at which further testing or remedial action are indicated. Radon has been documented in one study, completed in 1987, to determine if radon should be considered a potential health hazard in the State of Arizona. Radon was not considered an appreciable factor in Arizona from this overall testing. A review was conducted for Radon impacts included in the data above right. No adverse radon impact would be anticipated at this site and Phase II testing is not

recommended. Note that in the zip code reviews for this area 100% of the first floor living area reviews reported Radon below EPA established hazard levels. There are no basement living areas in this complex and the 2<sup>nd</sup> floor samples indicated no reported hazardous testing levels. The overall average Radon level for this area (2.5 pCi/L) was well below the 4 pCi/L considered the recommended testing level.

**AREA RADON INFORMATION**

State Database: AZ Radon

Radon Test Results (pCi/L)

Zip	City	Result (pCi/L)
85701	TUCSON	= 2.50
85701	TUCSON	= 3.00

Federal EPA Radon Zone for PIMA County: 2

- Note: Zone 1 indoor average level > 4 pCi/L.
- : Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
- : Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for Zip Code: 85701

Number of sites tested: 1

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	2.500 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	Not Reported	Not Reported	Not Reported	Not Reported

**Wastewater/Industrial Sumps**

Tucson/Pima County indicates the existing design and development for the site is compatible with the maximum standards for development capacity for handling residential wastes that include the subject property. No unusual conditions for wastewater handling exist at the subject property. In addition, no file, records, or listings for the subject property indicating health or safety violations were found by CSI during our literature search and review.

## Water

### Subject Property

Tucson Planning has stated that this site is included in the certification by Tucson/Pima County as meeting or exceeding minimum public consumption and potable water standards for the subject. The City of Pima County and Pima County Development Services indicates the proposed current site development (the subject) is within all limits of acceptable water planning.

### Adjacent Areas

A water well record search was conducted and sites were found (see Section III), but these do not adversely impact the subject property. There are a number of monitoring wells and impact review locations within one mile of the subject. An independent report of a Physical Setting Source document was ordered and reviewed (Section V, Appendix "A"). The importance of the well study is for site liability impacts assessment. These wells determine the conditions of the water sources and the flow of known adverse chemicals in the ground water system. Equally important is these wells assess the most likely source for any known contaminations and impacts from LUST which may or may not have been able to be identified in this report. This additional detail support the conclusions of this assessment that the subject property is absent liability for any environmental impacts and no leaking underground storage tanks exist within 1 mile of the subject.

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