

**Phase I Environmental Site Assessment
for the Property:
*Delta High School Property
Richland, Washington***

September 2011

Prepared for:
Richland School District
714 Thayer Drive
Richland, WA 99352

Prepared by:
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EXECUTIVE SUMMARY

A Phase I Environmental Site Assessment (ESA) was conducted by Columbia Environmental Sciences, Inc. (CESI) for the subject property referred to as Delta High School Property for the purposes of this report. The subject property includes Benton County parcel #111982020629008 and is located at 901 Northgate Drive (formerly 1011 Northgate Drive) in Richland, WA. The ESA was performed to identify environmental risks associated with the subject property.

Environmental concern for the subject property is considered **Moderate Risk** based on the findings of this assessment. The findings are:

- We found evidence of recognized environmental conditions for the subject property.
- The subject property, listed as CBC WSU Nurse Training Facility at 1011 Northgate Drive (the site's former address), is listed in the Facility Index System/Facility Registry System (FINDS), the Confirmed and Suspected Contaminated Sites List (CSCSL), the ALLSITES (facilities/sites of interest to the Washington Department of Ecology), and the Hazardous Sites List (HSL) with a rank of "3" (moderate level of environmental concern). The contaminant name is listed in the CSCSL as Petroleum Products – Unspecified, and the site is reportedly "Awaiting Cleanup." According to Roger Johnson of Washington Department of Ecology (WDOE) a release report was received in 2003, a federal preliminary assessment was completed in 2005, and a site hazard assessment was completed in 2007, resulting in the HSL listing.
- The complete history of the subject property is unknown. There were four buildings present on the property prior to 1988; their usage is unknown.
- Two adjacent properties to the west were identified in the Environmental Data Resources, Inc. (EDR) report and were discussed in an Environmental Transaction Screen (ETS) that was done for one of the properties by CESI in 2005. The two properties are considered to be upgradient with respect to groundwater flow; they are summarized below:
 - Old Richland Shop/Warehouse at 915 Goethals Drive is in the Comprehensive Environmental Response, Comprehension and Liability Information System (CERCLIS) and in the FINDS. A removal assessment was reportedly completed in 2000. The ETS from 2005 concluded that the property was not the current focus of any regulatory concern and that a removal assessment (following demolition activities) recommended no further site assessment.
 - Richland City Shops/Equipment Maintenance Shop at 965 Goethals Drive was identified in the Underground Storage Tank list (UST), the CSCSL list, the ALLSITES list, and in the Leaking Underground Storage Tank database (LUST). There were four USTs that were reportedly removed; contamination was listed as benzene, non-halogenated solvents, and petroleum-diesel in the CSCSL report. The LUST reportedly occurred in 1993 and cleanup has been started.
- Twenty four sites were identified in the EDR report within ¼-mile of the subject property. Four properties are considered to be cross-gradient with respect to groundwater flow and close enough to pose a low risk, they are summarized below:
 - Kadlec Medical Center at 888 Swift Blvd is in the ALLSITES, the CSCSL No Further Action (NFA) database, has USTs, is in the MANIFEST (hazardous waste manifest

information) database, is listed in the Voluntary Cleanup Program (VCP), and is in the ICR database. The NFA was issued in 2001, indicating that any existing environmental concerns were cleaned up to the satisfaction of WDOE. The site is listed as having four USTs, three of which have been removed. The operational UST is a 20,000 – 29,999 gallon tank that was upgraded in 1998 and is equipped with spill protection.

- Kadlec Medical Center at 1326 Mansfield is a RCRA Large Quantity Generator (RCRA-LQG), is in the FINDS, and in the ALLSITES. No violations were reported for this site. The site was formerly Richland City Shops/City of Richland Equipment Maintenance at 1300 & 1326 Mansfield. This site is still listed as a Resource Conservation and Recovery Act Non-Generator (RCRA-NonGen), in the FINDS, and is in the Independent Cleanup Report (ICR) database. No violations were reported in connection with the “Handler Activities” and ICRs were submitted to WDOE in 1993 and 1998 in connection with petroleum product contamination to groundwater and soil. The ETS from 2005 concluded that the property had no RCRA violations and posed a low risk to the adjacent property at 915 Goethals Drive.

- Coffee Bean Espresso (formerly Columbia Oil) at 840 Stevens is in the UST database, in the ICR database, in the FINDS, in the CSCSL, in the ALLSITES, and in the LUST database. The site previously had five storage tanks that have been removed. The LUST listing is due to benzene, non-halogenated solvents, and petroleum-gasoline contamination that occurred. Independent cleanup was started in 2000 and the site was listed as a voluntary cleanup site in 2008. According to Roger Johnson of WDOE independent cleanup has since terminated due to notification to the property owners by WDOE that more cleanup work needed to be done.

- Neighbors Conoco at 780 Stevens Drive is on the ALLSITES, in the UST database and in the Financial Assurance Information database. The site is an active gasoline station with operational tanks, which were upgraded in 1998 with spill prevention.

- No environmental liens were reported attached to the property.

CESI recommends coordination with WDOE regarding the CSCSL and HSL listings and site cleanup for the subject property as necessary.

4.0 Records Review

CESI reviewed reasonably ascertainable, standard sources to help identify recognized environmental conditions in connection with the property. Standard sources reviewed included standard environmental record sources, USGS topographic maps, soil survey maps, aerial photographs, city directories, and zoning records. In addition, interviews were conducted with persons knowledgeable with current and past uses of the property.

4.1 Standard Environmental Record Sources

Environmental Data Resources, Inc. (EDR) was contacted to perform a database search of regulatory agency published lists. They screened the agency-maintained databases for documentation of potential concerns within the distances of the property as specified by the ASTM standard. They reviewed federal lists, state and tribal lists, local lists, and 35 other lists.

The subject property, listed as CBC WSU Nurse Training Facility at 1011 Northgate Drive (the site's former address), is listed in the Facility Index System/Facility Registry System (FINDS), the Confirmed and Suspected Contaminated Sites List (CSCSL), the ALLSITES (facilities/sites of interest to the Washington Department of Ecology), and the Hazardous Sites List (HSL) with a rank of "3" (moderate level of environmental concern). The contaminant name is listed in the CSCSL as Petroleum Products – Unspecified, and the site is reportedly "Awaiting Cleanup." According to Roger Johnson of Washington Department of Ecology (WDOE) a release report was received in 2003, a federal preliminary assessment was completed in 2005, and a site hazard assessment was completed in 2007, resulting in the HSL listing (Appendix G).

Two adjacent properties to the west were identified in the EDR report and in the Environmental Transaction Screen (ETS) completed by CESI in 2005. It is likely that these two listings were once considered to be one parcel; the two are summarized below:

- Old Richland Shop/Warehouse at Mansfield & Goethals is in the Comprehensive Environmental Response, Comprehension and Liability Information System (CERCLIS) and in the FINDS. No violations were reported in connection with the "Handler Activities" and Independent Cleanup Reports (ICRs) were submitted to Washington Department of Ecology in 1993 and 1998 in connection with petroleum product contamination to groundwater and soil. The ETS from 2005 concluded that the property was not the current focus of any regulatory concern and that a removal assessment (following demolition activities) recommended no further site assessment was needed.
- Richland City Shops/Equipment Maintenance Shop at 965 Goethals Drive was identified in the Underground Storage Tank list (UST), the CSCSL list, the ALLSITES list, and in the Leaking Underground Storage Tank database (LUST). There were four USTs that were reportedly removed in 1999; contamination was listed as benzene, non-halogenated solvents, and petroleum-diesel in the CSCSL report. The LUST reportedly occurred in 1993 and cleanup has been started (Appendix G).

Twenty four sites were identified in the EDR report within ¼-mile of the subject property. Four properties are considered to be upgradient or cross-gradient with respect to groundwater flow and pose a low risk, they are summarized below:

- Kadlec Medical Center at 888 Swift Blvd is in the ALLSITES, the CSCSL No Further Action (NFA) database, has USTs, is in the MANIFEST (hazardous waste manifest information) database, is listed in the Voluntary Cleanup Program (VCP), and is in the ICR database. The NFA was issued in 2001, indicating that any existing environmental concerns were cleaned up to the satisfaction of WDOE. The site is listed as having four USTs, three of which have been removed. The operational UST is a 20,000 – 29,999 gallon tank that was upgraded in 1998 and is equipped with spill protection.
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- Coffee Bean Espresso (formerly Columbia Oil) at 840 Stevens is in the UST database, in the ICR database, in the FINDS, in the CSCSL, in the ALLSITES, and in the LUST database. The site previously had five storage tanks that have been removed. The LUST listing is due to benzene, non-halogenated solvents, and petroleum-gasoline contamination that occurred. Independent cleanup was started in 2000 and the site was listed as a voluntary cleanup site in 2008. According to Roger Johnson of WDOE independent cleanup has since terminated due to notification to the property owners by WDOE that more cleanup work needed to be done (Appendix G).
- Neighbors Conoco at 780 Stevens Drive is on the ALLSITES, in the UST database and in the Financial Assurance Information database. The site is an active gasoline station with operational tanks, which were upgraded in 1998 with spill prevention.

4.2 Physical Setting Sources

A 1990 USGS 7.5-Minute Series map of the property and surrounding area was reviewed to discern physical features of the site (Figure 2). The subject property lies at approximately 358 feet above mean sea level, and is basically flat. Groundwater is relatively shallow in the area, around 15 feet below ground surface, and probably moves generally east toward the Columbia River. Soil information for the property was obtained from the USDA NRCS National Cooperative Soil Survey website. Soil mapping for the property and a description of the soil series is provided in Appendix E - Soil Survey of Benton County, Washington. The property is mapped as Finley fine sandy loam (FeA) which has 0 to 2% slopes. These soils tend to be very deep, well-drained soils formed in gravelly alluvium found on alluvial fans.

4.3 Historical Use Information on the Property

Aerial photographs, the Benton County Assessor’s map, and a topographic map were reviewed for the property (Figures 2-4, and 6-10). The subject property appears to have had three buildings on it in 1948 and the same three in 1964, with an additional smaller building. The area is generally thought to be associated with Department of Energy (DOE) or City of Richland activities. Goethals Drive was built between 1948 and 1964. In 1973 it appears that only one of the four buildings remain. Northgate Drive was built between 1964 and 1973. The 1988 aerial

photograph and 1990 topographic map show the four classroom buildings that are in place currently (Figures 7 and 2, respectively). Between 1988 and 1996 the fifth building was constructed (Figure 6). Little appears to have changed between 1996 and 2011, except that the Benton County Assessor's Map shows a new parking lot adjacent to the property to the south (associated with the new CBC Health Sciences Center).

The property is not listed in Cole's City Directories until 1998, at which time it's listed under 1011 Northgate Drive for CBC. The address changed to 901 Northgate Drive in 2009.

Metsker's Atlas of Benton County, Washington for Section 11, Township 9 North, Range 28 East, was consulted and indicates that in 1934 and 1943 the property was part of "First Addition," and in 1976 no ownership was listed.

No historical fire insurance maps are available for the property.

4.4 Historical Use Information on Adjoining Properties

Aerial photographs, the Benton County Assessor's map, and a topographic map were reviewed for the adjoining properties (Figures 2-4, and 6-9). In 1948, the adjacent property to the north appears to be undeveloped. Structures on the other adjacent properties are evident, and probably were associated with DOE or the City of Richland. The adjacent properties appear to be mostly the same between 1948 and 1988 (Note that in the 1988 aerial photograph the adjacent property to the south is difficult to interpret); it appears that the library to the north was constructed between 1964 and 1973. By 1990 the adjacent property to the south appears to have been demolished. The adjacent property to the west underwent significant changes between 1996 and 2004 including demolition of the old Richland shop/warehouse and associated buildings to the north of that, and construction of the Mid Columbia Medical Specialists building.

4.5 Zoning Information

The subject property is zoned Central Business District (CBD) by the City of Richland (Figure 5).

5.0 Site Reconnaissance

The objective of the site reconnaissance is to obtain information indicating the likelihood of identifying ASTM-recognized environmental conditions in connection with the property. CESI staff conducted the site reconnaissance of the property on September 12, 2011, with Deidre Holmberg, Principal of Delta High School.

5.1 Methodology and Limiting Conditions

The property was observed by walking along the perimeter of the parcel as well as visiting the interior of three of the buildings. The common areas were observed, along with a representative classroom. There were no limitations to the site reconnaissance. Photographs taken during the site reconnaissance are provided in Appendix F.

5.2 General Site Setting

The subject property is located in the city of Richland and is bordered by Northgate Drive to the east, Goethals Drive to the west, and Mansfield Street to the south. The area has experienced growth in recent years with renovations to many properties. Most of the buildings are medical-service related. Figure 4 is a recent aerial photo showing the general site setting of the property and the surrounding area.

5.3 Subject Property Description

The subject property consists of five buildings located roughly in the center of the parcel. Associated parking lot and landscaped areas surround the buildings. The property is currently in operation as Delta High School and operates on a standard school schedule.

5.4 Storage Tanks

No storage tanks were observed on the subject property or on the adjoining properties.

5.5 Hazardous Substances and Hazardous Wastes

No hazardous substances or wastes as defined by ASTM E 1527-05 were observed on the subject property or on the adjoining properties.

5.6 Drums

No drums were observed on the subject property or on any of the adjacent properties.

5.7 Indications of PCB

No transformers or other equipment likely to contain PCBs were observed on the subject property.

5.8 Storm Drains

No storm drains were observed on the subject property.

5.9 Stained Soils

No stained soils were observed on the subject property.

5.10 Surrounding Properties

No conditions of environmental concern were observed on any of the surrounding properties during the site reconnaissance.

6.0 Interviews

CESI interviewed individuals familiar with the property and surrounding properties and local officials to obtain information regarding current and past uses of the property and surrounding areas, specifically, to obtain any information that might indicate the presence or potential presence of recognized environmental conditions in connection with the property.

6.1 Interviews with the User and Owner

Mr. Galt Pettett, General Counsel for Richland School District, was interviewed via email on September 15, 2011. He stated that he was unaware of any past or current use of the property that would indicate the presence or potential presence of recognized environmental conditions in connection with the property.

Mr. William Saraceno, Vice President of Administration for Columbia Basin College, provided information about ownership and property management, and completed the Owner Questionnaire on September 7, 2011 (Appendix C). Mr. Saraceno stated that he believed the property was "originally a parking lot for DOE. In regards to hazardous sites in the surrounding area, he stated that the property across the street [915 Goethals Drive] was used as a maintenance yard and spilled diesel or gas products that entered groundwater. He also stated that the current CBC Health Science Center is the location of an old steam plant for DOE and City of Richland. Mr. Saraceno has no further knowledge of the property that would indicate recognized environmental conditions in connection with the property.

6.2 Interviews with Government Officials

CESI requested information from Mr. Roger Johnson of WDOE for the subject property and for the Coffee Bean. He stated that an SHA was completed for the subject property in 2005 and notifications were sent out to the owner in 2005 and 2007. Records for the property are available through WDOE (ERTS# 545502). Regarding the Coffee Bean, he stated that WDOE sent a letter to the owner in 2009 stating that more cleanup work needed to be done, and that as a result participation in the Voluntary Cleanup Program ceased at that time.

6.3 Interviews with Others

Mr. Tony Hillerman of Benton County Washington Assessors was interviewed via telephone on September 8, 2011 in order to ascertain the history of the subject property. He stated that he was not familiar with the subject property in particular, but that the general area was associated with DOE operations in the past. He searched the Benton County Assessors database for the property and associated parcels. He found that the property was previously part of a larger 12-acre parcel and that there were two buildings associated with that parcel; however, no specific information could be obtained as to the type of buildings.

Ms. Deidre Holmberg, Principal of Delta High School, was interviewed during the site reconnaissance. She stated that she has been principal since 2008. She stated that the address of the building was changed in 2009 due to the address change of the library. She has no knowledge of the property that would indicated recognized environmental conditions in connection with the property.

7.0 Findings, Opinions, and Conclusion

7.1 Findings

The term recognized environmental condition is defined as “the presence or likely presence of any hazardous substance 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 even under conditions in compliance with laws.

We found evidence of recognized environmental conditions as defined above on the subject property:

- The subject property, listed as CBC WSU Nurse Training Facility at 1011 Northgate Drive (the site’s former address), is listed in the FINDS, the CSCSL, the ALLSITES, and the HSL with a rank of “3” (moderate level of environmental concern). The contaminant name is listed as Petroleum Products – Unspecified, and the site is reportedly “Awaiting Cleanup.” According to WDOE a release report was received in 2003, a federal preliminary assessment was completed in 2005, and a site hazard assessment was completed in 2007, resulting in the HSL listing.

We found evidence of recognized environmental conditions as defined above on the adjacent properties.

- Old Richland Shop/Warehouse at 915 Goethals Drive is in the CERCLIS and in the FINDS. A removal assessment was reportedly completed in 2000. The ETS from 2005 concluded that the property was not the current focus of any regulatory concern and that a removal assessment (following demolition activities) recommended no further site assessment.
- Richland City Shops/Equipment Maintenance Shop at 965 Goethals Drive was identified in the UST, the CSCSL list, the ALLSITES list, and in the LUST list. There were four USTs that were reportedly removed; contamination was listed as benzene, non-halogenated solvents, and petroleum-diesel in the CSCSL report. The LUST reportedly occurred in 1993 and cleanup has been started.

We found the following evidence of recognized environmental conditions as defined above on surrounding properties within ¼-mile:

- Kadlec Medical Center at 888 Swift Blvd is in the ALLSITES, the CSCSL NFA database, has USTs, is in the MANIFEST database, is listed in the VCP, and is in the ICR database. The NFA was issued in 2001, indicating that any existing environmental concerns were cleaned up to the satisfaction of WDOE. The site is listed as having four USTs, three of which have been removed. The operational UST is a 20,000 – 29,999 gallon tank that was upgraded in 1998 and is equipped with spill protection.
- Kadlec Medical Center at 1326 Mansfield is a RCRA Large Quantity Generator (RCRA-LQG), is in the FINDS, and in the ALLSITES. No violations were reported for this site. The site was formerly Richland City Shops/City of Richland Equipment Maintenance at 1300 & 1326 Mansfield. This site is still listed as a Resource Conservation and Recovery Act Non-Generator (RCRA-NonGen), in the FINDS, and is in the Independent Cleanup Report (ICR) database. No violations were reported in connection with the “Handler Activities” and ICRs

were submitted to WDOE in 1993 and 1998 in connection with petroleum product contamination to groundwater and soil. The ETS from 2005 concluded that the property had no RCRA violations and posed a low risk to the adjacent property at 915 Goethals Drive.

- Coffee Bean Espresso (formerly Columbia Oil) at 840 Stevens is in the UST database, in the ICR database, in the FINDS, in the CSCSL, in the ALLSITES, and in the LUST database. The site previously had five storage tanks that have been removed. The LUST listing is due to benzene, non-halogenated solvents, and petroleum-gasoline contamination that occurred. Independent cleanup was started in 2000 and the site was listed as a voluntary cleanup site in 2008. According to Roger Johnson, WDOE, independent cleanup has since terminated due to notification to the property owners by WDOE that more cleanup work needed to be done.
- Neighbors Conoco at 780 Stevens Drive is on the ALLSITES, in the UST database and in the Financial Assurance Information database. The site is an active gasoline station with operational tanks, which were upgraded in 1998 with spill prevention.

7.2 Opinion

CESI summarizes risks on the following scale:

- None – no discovered actual or material threats of releases on the property or neighboring properties.
- Low – discovered actual or material threats of releases on the property or surrounding properties that, in our professional judgment and experience, would more likely than not be considered of minimal concern to EPA and WDOE.
- Moderate – discovered actual or material threats of releases on the property or surrounding properties that, in our professional judgment and experience, would more likely than not be considered of concern to EPA and WDOE.
- High - discovered actual or material threats of releases on the property or surrounding properties that have led to, or are about to lead to significant, ongoing regulatory attention.

Our opinion of environmental risk for the property is presented in the table on the following page:

	No Risk	Low Risk	Moderate Risk	High Risk
Subject Property				
Current			√	
Past			√	
Vicinity				
Current			√	
Past			√	
Overall Risk			√	

Our summary of risk for the property is **Moderate Risk**. This opinion is based on the following:

- The subject property, listed as CBC WSU Nurse Training Facility at 1011 Northgate Drive (the site's former address), is listed in the FINDS, the CSCSL, the ALLSITES, and the HSL with a rank of "3." WDOE considers a hazard ranking of "3" as a moderate level of environmental concern. The contaminant name is listed as Petroleum Products – Unspecified, and the site is reportedly "Awaiting Cleanup." According to WDOE a release report was received in 2003, a federal preliminary assessment was completed in 2005, a site hazard assessment was completed in 2007 resulting in the HSL listing.
- The complete history of the subject property is unknown. There were four buildings present on the property prior to 1988; their usage is unknown.
- Two adjacent properties to the west were identified in the EDR report and were discussed in an ETS that was done for one of the properties by CESI in 2005. The two properties are considered to be upgradient with respect to groundwater flow; they are summarized below:
 - Old Richland Shop/Warehouse at 915 Goethals Drive is in the CERCLIS and in the FINDS. A removal assessment was reportedly completed in 2000. The ETS from 2005 concluded that the property was not the current focus of any regulatory concern and that a removal assessment (following demolition activities) recommended no further site assessment.
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- Twenty four sites were identified in the EDR report within ¼-mile of the subject property. Four properties are considered to be cross-gradient with respect to groundwater flow and close enough to pose a low risk; they are summarized below:
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- Neighbors Conoco at 780 Stevens Drive is on the ALLSITES, in the UST database and in the Financial Assurance Information database. The site is an active gasoline station with operational tanks, which were upgraded in 1998 with spill prevention.

- No environmental liens were reported attached to the property.

7.3 Recommendations

CESI recommends coordination with WDOE regarding the CSCSL and HSL listings and site cleanup for the subject property as necessary.

7.4 Conclusions

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527-05 of Benton County parcel #111982020629008 located at 901 Northgate Drive (formerly 1011 Northgate Drive) in Richland, WA. Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report.

This assessment has revealed no evidence of recognized environmental conditions in connection with the subject property except for the following:

- The subject property, listed as CBC WSU Nurse Training Facility at 1011 Northgate Drive (the site's former address), is listed in the FINDS, the CSCSL, the ALLSITES, and the HSL with a rank of "3" (moderate level of environmental concern). The contaminant name is listed as Petroleum Products – Unspecified, and the site is reportedly "Awaiting Cleanup." According to WDOE a release report was received in 2003, a federal preliminary assessment was completed in 2005, and a site hazard assessment was completed in 2007, resulting in the HSL listing.

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- Neighbors Conoco at 780 Stevens Drive is on the ALLSITES, in the UST database and in the Financial Assurance Information database. The site is an active gasoline station with operational tanks, which were upgraded in 1998 with spill prevention.

7.5 Signatures of Environmental Professionals

CESI staff members contributing to the process and completion of this ESA declare that, to the best of our professional knowledge and belief, we meet the definition of environmental professionals as defined in Section 312.10 of 40 CFR 312 and we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

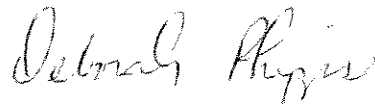
Columbia Environmental Sciences, Inc.

Elizabeth Siping, Environmental Professional

 for EAS
Signature Date 9/16/11

Reviewed by:

Deborah Phipps, Environmental Professional


Signature Date

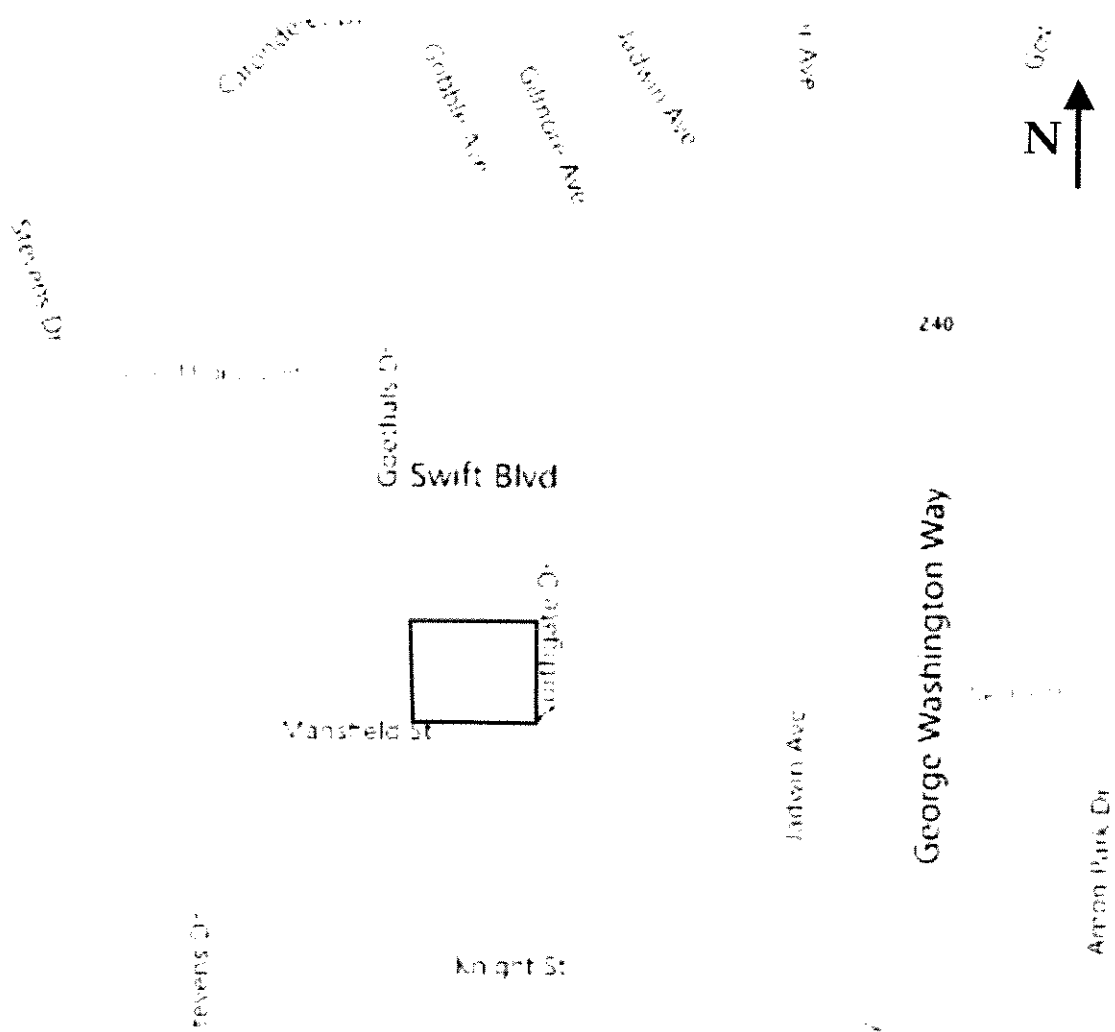


Figure 1 - Site Location Map (Microsoft © NAVTEQ, 2008). The subject property is located in Richland, Washington 901 Northgate Drive, and is shown above.

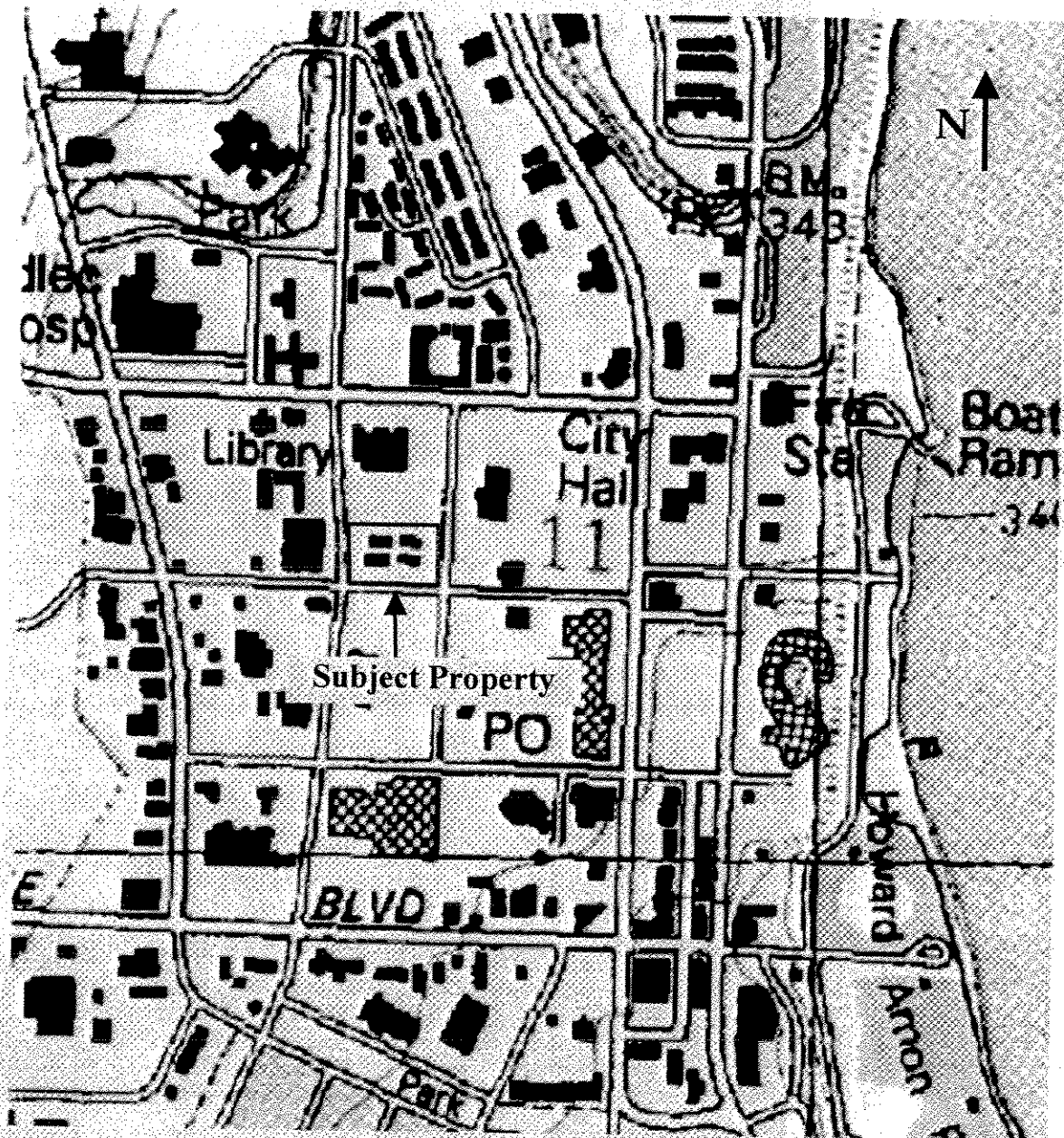


Figure 2 - USGS 7.5-Minute Series Topographic Map (1990). The location of the property is outlined above in blue. The topography of the property consists of a relatively flat terrain, sloping slightly to the east toward the Columbia River (visible to the right). The elevation of the site is approximately 358 feet above msl. The property lies in Section 11, Township 9 North, Range 28 East, W.M.

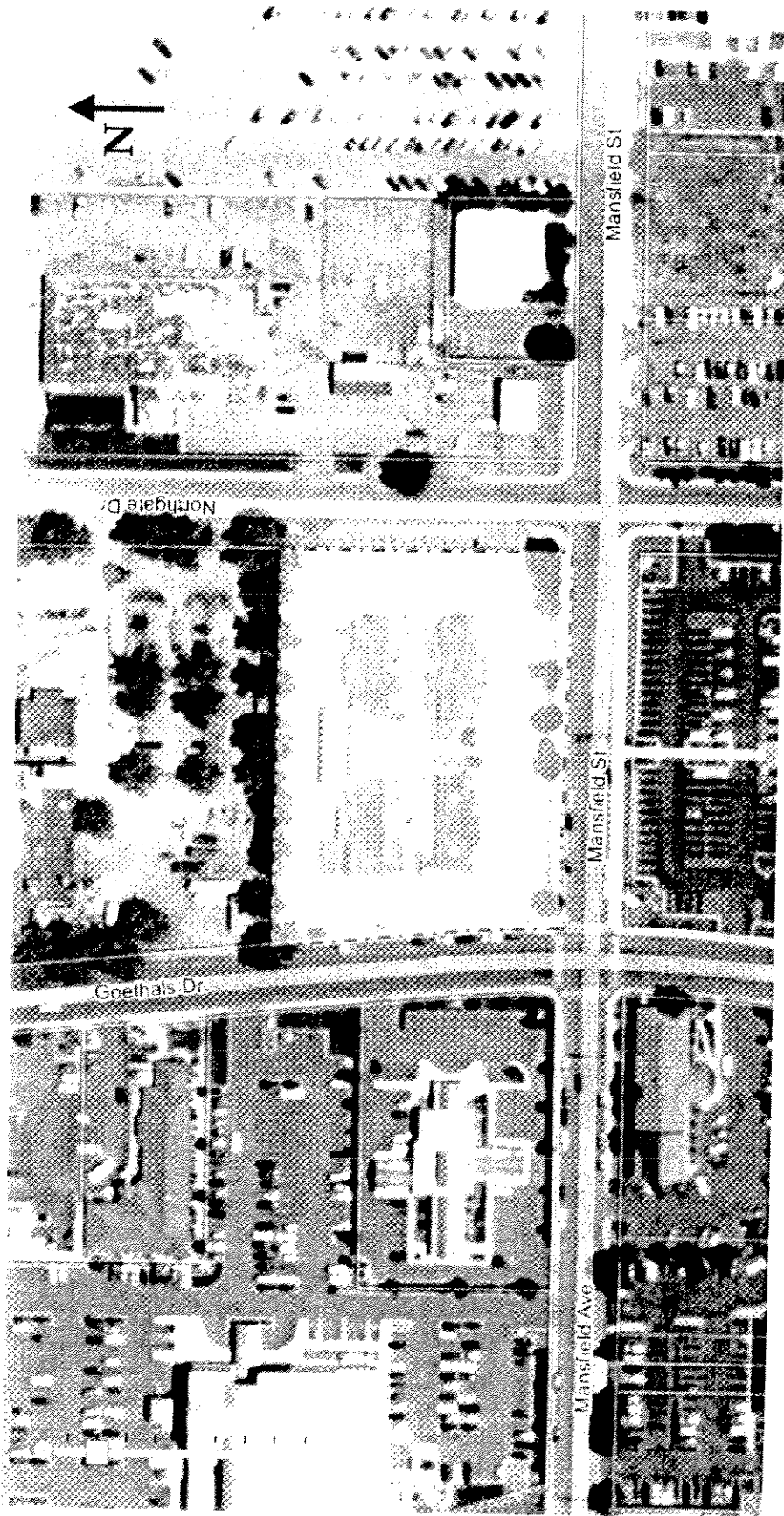


Figure 3 – Benton County Assessors Map (2011). The subject property is shaded above in yellow. It is located at 901 Northgate Drive in Richland, Washington. The parcel is also bordered by Goethals Drive to the west and Mansfield Street to the south.

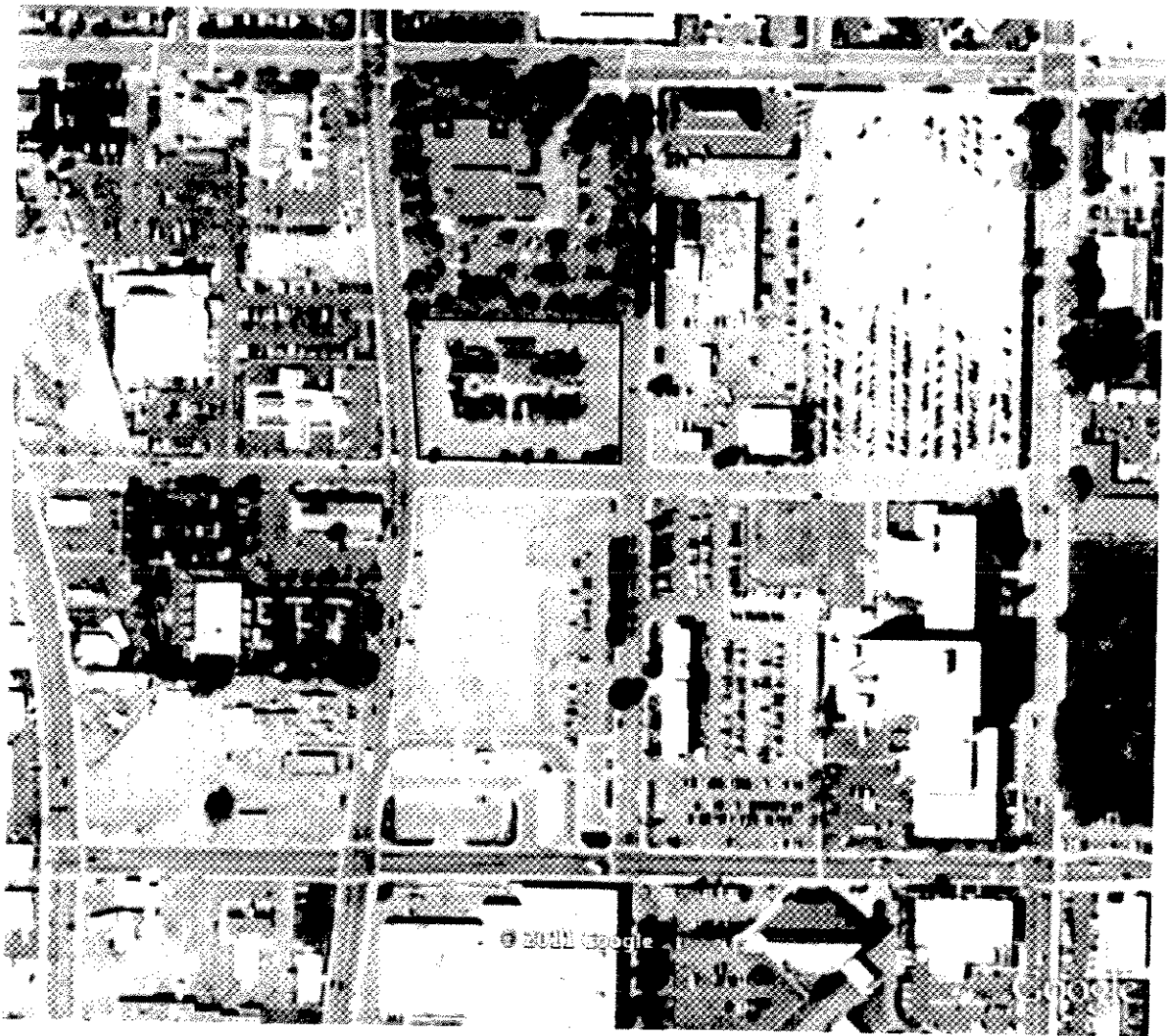


Figure 4: Recent Aerial Photograph (Google Earth, 2004). The subject property is outlined above in blue. The surrounding areas are in mixed use including mostly retail businesses and medical offices.

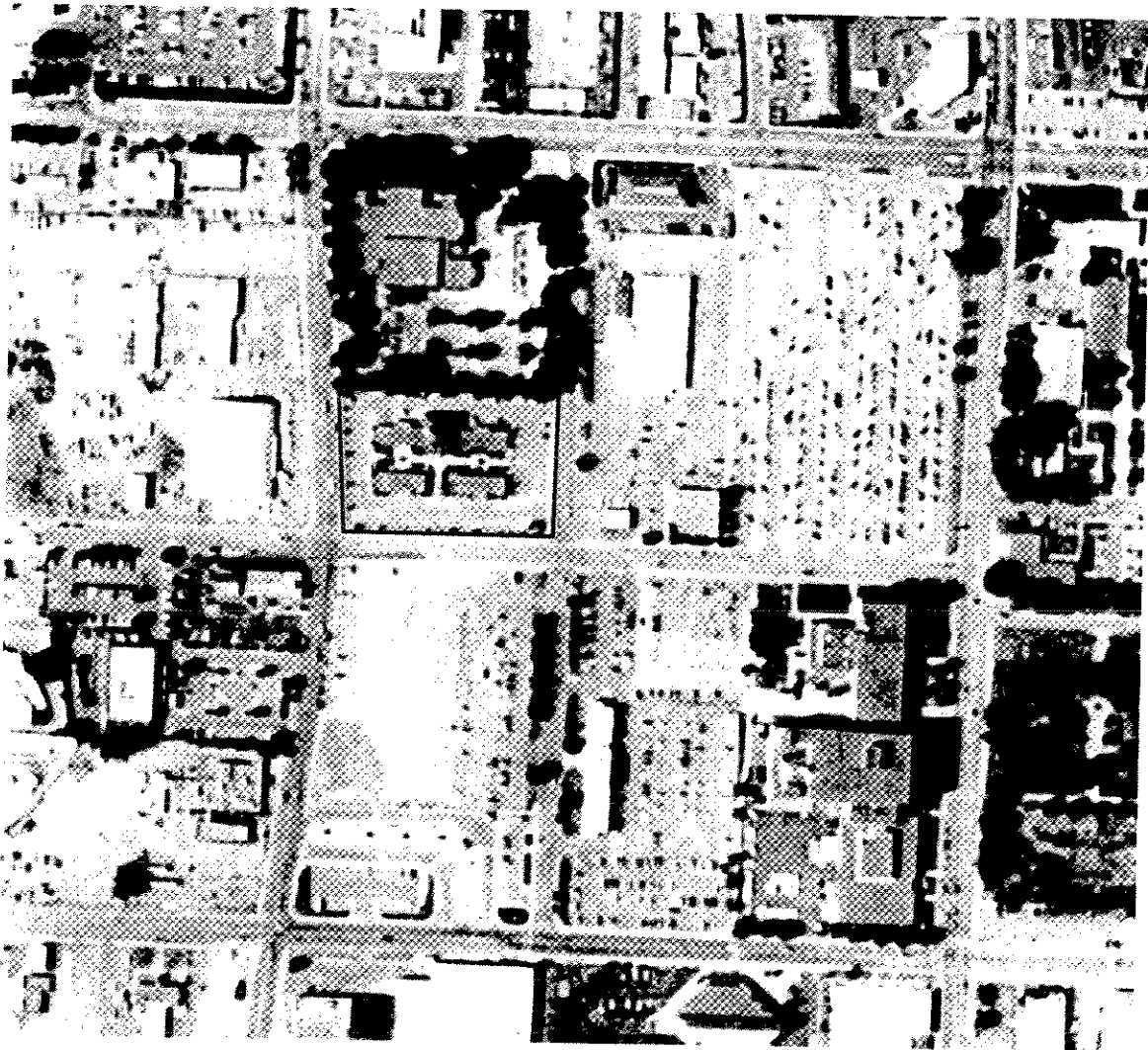


Figure 6: Aerial Photograph (USGS, 1996). The subject property is outlined above in blue.



Figure 7: Aerial Photograph (USGS, 1988). The subject property is outlined above. Four of the five buildings currently located on the property are visible here.