

Exhibit 25  
Phase I  
Environmental Assessment



City of Natchitoches  
Highway 478 Development Tract



April 7, 2020

Cothren, Graff, Smoak Engineering, Inc.  
Attn: Ms. Julianne Smoak  
6305 Westport Avenue  
Shreveport, Louisiana 71129

Re: Phase I Environmental Site Assessment  
Approximately 155 Acres  
31°39'32" North and 93°6'23" West  
State Highway 478  
Natchitoches, Natchitoches Parish, Louisiana 71457

Ms. Smoak,

Jones Environmental, Inc. (JEI) was retained by Ms. Julianne Smoak on behalf of Cothren, Graff, Smoak Engineering, Inc., 6305 Westport Avenue, Shreveport, Louisiana 71129 to perform a **PHASE I ENVIRONMENTAL SITE ASSESSMENT** for the approximately 155-acre property located with an approximate center of latitude 31°39'32" North and longitude 93°06'23" West off State Highway 478 in Natchitoches, Natchitoches Parish, Louisiana 71457. The site assessment was performed in general accordance with ASTM E1527-13, Standard Practice for Environmental Site Assessment: Phase I Environmental Site Assessment Process. JEI Environmental Specialist, Michael Trammel, made onsite observations of the subject property on March 24, 2020. JEI did not identify any *recognized environmental conditions* associated with the subject property.

JEI appreciates the opportunity to serve you and your environmental concerns. If you have further questions concerning the findings of this investigation or proposal, please feel free to call me anytime at (318) 226-8444. Thank you for your time.

Sincerely,

A handwritten signature in cursive script that reads "Sherron Greer".

Sherron Greer  
Environmental Specialist  
Jones Environmental, Inc.

PHASE I ENVIRONMENTAL  
SITE ASSESSMENT REPORT  
APPROXIMATELY 155 ACRES  
LATITUDE 31°39'32" NORTH AND LONGITUDE 93°06'23" WEST  
STATE HIGHWAY 478  
NATCHITOCHE, NATCHITOCHE PARISH, LOUISIANA 71457

SITE CONDITIONS AS OF MARCH 24, 2020

PREPARED FOR:  
COTHREN, GRAFF, SMOAK ENGINEERING, INC  
ATTN: MS. JULIANNE SMOAK  
6305 WESTPORT AVENUE  
SHREVEPORT, LOUISIANA 71129

**JONES**  
ENVIRONMENTAL

PREPARED BY:  
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(318) 226-8444



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SHERRON GREER, ENVIRONMENTAL SPECIALIST

APPROVED BY:



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MICHAEL TRAMMEL, ENVIRONMENTAL SPECIALIST

APRIL 7, 2020

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## EXECUTIVE SUMMARY

Jones Environmental, Inc. (JEI) was retained by Ms. Julianne Smoak on behalf of Cothren, Graff, Smoak Engineering, Inc., 6305 Westport Avenue, Shreveport, Louisiana 71129 to perform a **PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)** of the approximately 155-acre property located with an approximate center of latitude 31°39'32" North and longitude 93°06'23" West off State Highway 478 in Natchitoches, Natchitoches Parish, Louisiana 71457. This assessment was performed in general accordance with the American Society for Testing and Materials (ASTM) Practice E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. For this Phase I ESA, JEI conducted a site reconnaissance visit, interviewed the key site manager, conducted Federal and State environmental regulatory database searches, and researched historical records for the property. Michael Trammel, Environmental Specialist, of JEI made onsite observations of the subject property on March 24, 2020.

The subject property is located in Section 20, Township 8 North, Range 7 West with an approximate center of latitude 31°39'32" North and longitude 93°06'23" West in Natchitoches, Natchitoches Parish, Louisiana 71457. The subject property is currently undeveloped. According to Mr. Paul Ferrel with Mossy Oak Properties and JEI's review of available historical research information, the subject property has never been developed.

The surrounding area contains residential and undeveloped properties. State Highway 478 followed by undeveloped and residential properties adjoins to the eastern property boundary. A concrete area with a gated driveway followed by undeveloped property adjoins to the northern property boundary. State Highway 478 followed by U.S. Interstate Highway 49 (I-49) adjoins to the northeastern property boundary. Undeveloped land adjoins to the southern property boundary. The assessment was completed on the property as per the legal description included in **Appendix D** of this report.

JEI has performed a *Phase I Environmental Site Assessment* in general conformance with the scope and limitations of ASTM Practice E1527 of the approximately 155-acre property located with an approximate center of latitude 31°39'32" North and longitude 93°06'23" West off State Highway 478 in Natchitoches, Natchitoches Parish, Louisiana 71457, the *Property*. Any exceptions to, or deletions from, this practice are described in Section 1.3 of this *report*. This assessment did not identify any *recognized environmental conditions* in connection with the subject property, as defined in the ASTM Phase I ESA protocol. The user

of this report must recognize that no environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Performance of this site assessment is intended to reduce, not eliminate, the uncertainty regarding the potential for recognized environmental conditions in connection with a property.

## 1.0 INTRODUCTION

### 1.1 Property Location and Legal Description

The subject property location is depicted on a current USGS 7.5-minute topographic map as **Figure 4** in **Appendix A**. The property is geographically located in Section 20, Township 8 North, Range 7 West in Natchitoches, Natchitoches Parish, Louisiana 71457. JEI determined the latitude 31°39'32" North and longitude 93°06'23" West for the approximate center of the property.

### 1.2 Purpose

ASTM Practice E1527-13 states that the Phase I ESA Process is intended to permit the user "...to satisfy one of the requirements to qualify for the *innocent landowner*, *contiguous property owner*, or *bona fide prospective purchaser* limitations on CERCLA liability: 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 in 42 USC §9601(35)(B)." The purpose of a Phase I ESA is to attempt to identify *recognized environmental conditions* in connection with the subject property. The term *recognized environmental conditions* (as defined by ASTM E 1527-13) means the presence or likely presence of any *hazardous substances* or *petroleum products* in, on, or at a property under conditions that indicate an existing release, past release, or a material threat of a release into structures on the property or into the ground, groundwater, or surface water of the property.

The Environmental Protection Agency (EPA) promulgated an "all appropriate inquiries" ("AAI") rule that became effective in November 2006. EPA has indicated that this Practice E1527 is consistent with the requirements of AAI and may be used to comply with the provisions of the AAI rule.

### 1.3 Scope of Work

This Phase I ESA was conducted in general accordance with ASTM Practice E1527-13 and consists of the following:

1. Site Reconnaissance of the subject property. The site was surveyed for visual evidence of recognized environmental conditions. Use and occupancy of adjacent properties were documented.
2. Interviews with representatives of the current property owner, the previous property owner and developer (if applicable), and the on-site manager regarding current and historical property use.
3. Regulatory Records Review of the following environmental databases within the appropriate minimum search distance from the subject property:

DATABASE*	SEARCH DISTANCE
Federal NPL site list	1 mile radius
Federal Delisted NPL site list	0.5 mile radius
Federal CERCLIS list	0.5 mile radius
Federal CERCLIS NFRAP site list	0.5 mile radius
Federal RCRA CORRACTS facilities list	1 mile radius
Federal RCRA non-CORRACTS TSD facilities list	0.5 mile radius
Federal RCRA generators list	Property and adjoining properties
Federal Institutional control/engineering control registries	Property only
Federal ERNS list	Property only
State and Tribal equivalent NPL	1 mile radius
State and Tribal equivalent CERCLIS	0.5 mile radius
State and Tribal landfill and/or solid waste disposal site lists	0.5 mile radius
State and Tribal Leaking Storage Tank lists	0.5 mile radius
State and Tribal Registered Storage Tank lists	Property and adjoining properties
State and Tribal institutional control/engineering control registries	Property only
State and Tribal voluntary cleanup sites	0.5 mile radius
State and Tribal Brownfield sites	0.5 mile radius

\*These records must be in a practically reviewable format and reasonably ascertainable. These records were researched for the entire length of compilation (per agency) or not more than fifty (50) years from project assignment.

4. Historical records research included review of reasonably ascertainable aerial photographs, maps, and title documents to identify ownership and use of the subject property from the present back to at least 1940.
5. The Technical Report will include the following:
  - A) Aerial Photos, if reasonably ascertainable, from local university archives, the local library, the Department of Transportation and Development and/or the National Resources Conservation Service.
  - B) A current United States Geological Survey 7.5-minute Topographic Map.
  - C) All information collected during the course of the assessment, according to ASTM Standards.
  - D) A current site map depicting any *recognized environmental conditions* if necessary.

#### **1.4 Limitations and Exceptions**

JEI has performed this Phase I ESA in general accordance with ASTM E1527-13 and the previously agreed upon scope of work. Certain environmental concerns that are outside the scope of ASTM E1527-13 were not addressed, including wetlands, radon, lead-based hazards, asbestos containing materials, regulatory compliance, cultural/historical resources, industrial hygiene, biological agents, mold, endangered species, and indoor air quality. Portions of this report were obtained from secondary sources, personal referrals, or telephone conversations. JEI assumes that the information obtained was relatively accurate. Within the scope of work described herein and the time frame in which it was completed, JEI did not identify any *recognized environmental conditions* associated with the subject property. No absolute guarantee can be made or implied regarding the existence or absence of environmental contamination at any location other than those inspected. Certified Sanborn<sup>®</sup> maps for the subject property were not available through Environmental Risk Information Services (ERIS). City Directories were not available through ERIS for surrounding properties. Historical topographic maps were available back to 1937. Historical aerial photographs were available back to 1940.

All findings, opinions, and conclusions within this report are based upon prevailing circumstances at the time of report preparation. JEI has no control of the dynamics of environmental regulations or the retroactive implementation thereof and therefore makes no warranty that the actions based on these findings, opinions, and conclusions will result in compliance with environmental regulations. This report is subject to modification if subsequent information is developed by JEI or any other party. JEI does not accept liability for problems not identifiable within this prescribed scope of work nor problems that may develop at a future date on this property.

#### **1.5 Special Terms and Conditions**

Authorization to proceed with this Phase I ESA was granted by Ms. Julianne Smoak, on behalf of Cothren, Graff, Smoak Engineering, Inc., 6305 Westport Avenue, Shreveport, Louisiana 71129 on March 20, 2020. The time frame for completion of the final report was by April 9, 2020. The purpose of completing the Phase I ESA was approval for the Louisiana Economic Development (LED) Certified Sites Program.

#### **1.6 User Reliance**

The scope of the project is limited to matters expressly described in the report. The report was prepared for the benefit of Julianne Smoak on behalf of Cothren, Graff, Smoak Engineering, Inc. The report may not be relied upon by any other entity without written approval from JEI via authorization from Cothren, Graff, Smoak Engineering, Inc.

## **2.0 SITE DESCRIPTION**

### **2.1 Site and Vicinity General Characteristics**

The site and immediate vicinity are illustrated in **Figure 11 (Appendix A)**. The subject property is located in Section 20, Township 8 North, Range 7 West with an approximate latitude 31°39'32" North and longitude 93°06'23" West off State Highway 478 in Natchitoches, Natchitoches Parish, Louisiana 71457. The surrounding area contains undeveloped and residential properties. At the time of the site visit, the subject property consisted of approximately 155 acres of undeveloped land. Access is provided via State Highway 478 which runs along the eastern perimeter of the property.

### **2.2 Current and Past Uses of the Subject Property**

The subject property is located in Section 20, Township 8 North, Range 7 West with an approximate latitude 31°39'32" North and longitude 93°06'23" West off State Highway 478 in Natchitoches, Natchitoches Parish, Louisiana 71457. At the time of the site visit, the subject property was currently undeveloped. According to Mr. Paul Ferrel on behalf of Mossy Oak Properties, the subject property has always been undeveloped.

### **2.3 Description of Roads, Structures, and Other Improvements**

At the time of the site visit, the subject property was undeveloped. According to Mr. Paul Ferrel on behalf of Mossy Oak Properties, the property has always been undeveloped. Based on a review of aerial photographs, two (2) access roads are located on the western and northern portions of the subject property. State Highway 478 runs along the eastern perimeter of the subject property.

### **2.4 Current and Past Uses of Adjoining Properties**

**North** – Adjoining property to the north of the subject property consists of undeveloped land. According to historical aerial photographs, the undeveloped land has never been developed. There are no apparent *recognized environmental conditions* related to the current or historical use of the adjoining property to the north.

**South** – Adjoining property to the south of the subject property consists of undeveloped land. According to historical aerial photographs, the undeveloped land has never been developed. There are no apparent

*recognized environmental conditions* related to the current or historical use of the adjoining property to the south.

**West** – Adjoining property to the west of the subject property consists of undeveloped land. According to historical aerial photographs, the undeveloped land has never been developed. There are no apparent *recognized environmental conditions* related to the current or historical use of the adjoining property to the west.

**East** – Adjoining property to the east of the subject property consists of State Highway 478 followed by undeveloped land and residential properties. According to historical aerial photographs, State Highway 478 was built prior to 1940. According to historical aerial photographs, the residential properties were built between 1952 through 1976. There are no apparent *recognized environmental conditions* related to the current or historical use of the adjoining property to the east.

### **3.0 USER PROVIDED INFORMATION**

#### **3.1 Title Records**

A legal description of the subject property was provided is included in **Appendix D** of this report.

#### **3.2 Environmental Liens or Activity and Use Limitations**

Ms. Julianne Smoak on behalf of CGS Engineering Inc., completed the User Questionnaire which is located in **Appendix D** of this report. Ms. Smoak reported no knowledge or information regarding environmental liens related to environmental hazards on the subject property.

#### **3.3 Specialized Knowledge**

Ms. Smoak did not report any specialized knowledge regarding environmental issues regarding the subject property.

#### **3.4 Valuation Reduction for Environmental Issues**

Ms. Smoak did not report any reduction in the value of the property due to environmental issues.

#### **3.5 Owner, Property Manager, and Occupant Information**

Mr. Paul Ferrell, on behalf of Mossy Oak Properties, currently is the site broker for the subject property. The subject property is currently undeveloped.

#### **3.6 Reason for Performing Phase I**

The user's reason for performing this Phase I ESA is approval for LED certified sites program.

## **4.0 RECORDS REVIEW**

### **4.1 Standard Environmental Record Sources**

The following section is based on public information obtained from federal and state agencies that maintain environmental regulatory databases. These databases provide information about the regulatory status of a site and incidents involving hazardous materials use, storage, or transportation of such materials. Information was compiled by JEI and by Environmental Risk Information Services, (ERIS) a professional data search service. The ERIS Database™ Report, dated March 22, 2020, is included in **Appendix F** of this report. See the Eris Database™ Report for additional detail about each database and the associated acronyms as discussed.

#### **4.1.1 National Priority List (NPL)**

The National Priority List (NPL) is an EPA listing of the nation's worst uncontrolled or abandoned hazardous waste sites. These sites are targeted for long-term remedial action under the Comprehensive Environmental Response, Compensation, and Liability (CERCLA) Act. The USEPA has the authority to file liens against real property in order to recover costs of remediation or when the property owner received notification of potential liability. The ERIS Database™ Report includes a review of the NPL database dated January 30, 2020, the proposed NPL database dated January 30, 2020, and the NPL liens database dated October 15, 1991. No NPL sites, proposed NPL sites, or state or tribal equivalent NPL sites were identified within the appropriate 1.0-mile search radius of the subject property. NPL liens were not identified on the subject property.

#### **4.1.2 Federal De-Listed NPL Sites**

Sites may be deleted from the NPL where no further action is appropriate. The ERIS Database™ Report includes a review of the de-listed NPL site list dated January 30, 2020. No de-listed NPL sites were identified within the appropriate 0.5-mile search radius of the subject property.

#### **4.1.3 Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)**

The CERCLIS list, renamed SEMS (Superfund Enterprise Management System) by EPA in 2015, contains sites that are either proposed to or on the NPL and sites that are in the screening and assessment phase for possible inclusion on the NPL. These sites have been or currently are under investigation by the USEPA because of a release or threatened release of hazardous substances to the environment. The ERIS Database™

Report includes a review of the CERCLIS/SEMS database dated October 25, 2013 for sites within the appropriate 0.5-mile search radius of the subject property. The No Further Remedial Action Planned (NFRAP) database dated October 25, 2013 was also reviewed. No CERCLIS facility sites were identified within the appropriate 0.5-mile search radius of the subject property.

#### **4.1.4 Federal Resource Conservation and Recovery Act (RCRA) CORRACTS List**

Inclusion on the RCRA CORRACTS (corrective action) list indicates that a facility treats, stores, and/or disposes of hazardous wastes on-site and has received a “corrective action order” pursuant to the Resource Conservation and Recovery Act (RCRA) Section 3008 (h) because of a release of hazardous waste or constituents into the environment. The ERIS Database™ Report includes review of this EPA database released November 18, 2019. No RCRA CORRACTS facility sites were identified within the appropriate 1.0-mile search radius of the subject property.

#### **4.1.5 Federal RCRA Non-CORRACTS TSD Facilities List**

The RCRA non-CORRACTS TSD Facilities List includes selective information on sites that generate, transport, store, treat, and/or dispose of hazardous waste as defined by RCRA. The ERIS Database™ Report includes review of this EPA database released November 18, 2019. RCRA non-CORRACTS TSD facilities were not identified within the appropriate 0.5-mile search radius of the subject property.

#### **4.1.6 Federal RCRA Generators List**

The ERIS Database™ Report includes a review of RCRA databases dated November 18, 2019 for large and small quantity hazardous waste generators and very small quantity generators. Hazardous waste generators within 0.25 mile are identified. Large quantity generators produce more than 1000 kilograms of hazardous waste per month. Small quantity generators produce between 100 kg and 1000 kg of hazardous waste per month or meet other applicable requirements of the RCRA. Very small quantity generators produce less than 100 kg of hazardous waste or less than 1 kg of acutely hazardous waste per month. Federal RCRA Generators were not identified within the appropriate 0.25-mile search radius of the subject property.

#### **4.1.7 Federal Institutional Control/Engineering Control Registries**

The ERIS Database™ Report includes review of the EPA listings of sites with institutional or engineering controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post-remediation care requirements intended to prevent

exposure to contaminants remaining on site. Deed restrictions are generally required for institutional controls. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or affect human health. The ERIS Database™ Report includes review of these EPA databases dated June 11, 2019. No sites with institutional or engineering controls were identified within the appropriate 0.5-mile search radius of the subject property.

#### **4.1.8 Federal Emergency Response Notification System (ERNS)**

The ERNS is a national database of information on sudden and/or accidental releases of hazardous substances, including petroleum, into the environment. The ERIS Database™ Report includes review of ERNS data from the National Response Center and the U.S. Coast Guard released November 25, 2019. No releases were identified on the subject property.

#### **4.1.9 State Equivalent CERCLIS**

The State Equivalent CERCLIS List is a comprehensive listing of all state equivalent sites currently or formerly under review by the United States Environmental Protection Agency. The State Superfund Registry (SHWS) is Louisiana's State Equivalent CERCLIS. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not 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 ERIS Database™ Report identifies SHWS through an updated list dated December 4, 2019. No SHWS sites were identified within the appropriate 1.0-mile search radius of the subject property.

#### **4.1.10 State and Tribal Landfill and/or Solid Waste Disposal Site Lists**

These records typically contain an inventory of a state's solid waste disposal facilities or landfills. These may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites. The ERIS Database™ Report includes review of this Louisiana Department of Environmental Quality (LDEQ) landfill list dated June 11, 2019 and the LDEQ list of approved debris sites dated March 3, 2020. No SWF/LF waste disposal sites were identified within the appropriate 0.5-mile search radius of the subject property.

#### **4.1.11 State and Tribal Leaking Storage Tanks**

The LDEQ Leaking Underground Storage Tank (UST) Incident Report is a comprehensive listing of all reported resolved and unresolved UST release incidents within the State of Louisiana. The ERIS Database™ Report identifies UST releases within 0.5 mile of the subject property using this database dated December 12, 2019. Leaking USTs on Indian land are also identified. HIST LUST records contain detailed information for LUST sites reported through November 1, 1999. This list is no longer updated. According to the ERIS, no LUST sites were identified within the appropriate 0.5-mile search radius of the subject property.

#### **4.1.12 State and Tribal Registered Storage Tanks**

Louisiana does not require registration of above ground storage tanks. The Louisiana UST database includes all registered active, inactive, and removed USTs in the State of Louisiana. The ERIS Database™ Report identifies UST sites within 0.25 mile of the subject property obtained from the LDEQ database of registered tanks dated December 12, 2020, the USEPA list of registered USTs on tribal land dated April 17, 2019, and the list of FEMA USTs dated August 27, 2019. No UST sites were identified within the appropriate 0.25-mile search radius of the subject property.

#### **4.1.13 State and Tribal Institutional Control/Engineering Control Registries**

The State and Tribal Institutional Control/Engineering Control Registries are listings whereby a notice of contamination (nature and levels of contaminants) and restriction of property to non-residential use are placed in the conveyance records for the property. The ERIS report includes a review of property listings provided by the Louisiana Department of Environmental Quality dated October 4, 2019. The subject property was not listed as an Institutional Control/Engineering Control Registries site. No AUL sites were identified within the appropriate 0.5-mile search radius of the subject property.

#### **4.1.14 State and Tribal Voluntary Cleanup Sites**

The ERIS Database™ Report includes sites that have entered the LDEQ Voluntary Remediation Program (VCP). The database for these sites is dated March 3, 2020. No VCP sites were identified within the appropriate 0.5-mile search radius of the subject property.

#### **4.1.15 State and Tribal Brownfields Sites**

The ERIS Database™ Report includes review of the USEPA database listing the addresses of brownfields properties by Cooperative Agreement Recipients and Targeted Brownfields Assessment. These sites are designated for cleanup and redevelopment. The database for these sites is dated September 3, 2019. No Brownfields sites were identified within the appropriate 0.5-mile search radius of the subject property.

### **4.2 Additional Environmental Record Sources**

#### **4.2.1 Additional Environmental Records**

The ERIS Radius Map™ Report in **Appendix F** includes review of a number of other environmental databases including local lists of solid waste disposal sites including open dumps, hazardous waste and contaminated sites, recycling facilities, local land records, emergency release reports, and other ascertainable records. No additional environmental concerns were identified based upon our review of these additional records.

#### **4.2.2 ERIS Vapor Encroachment Screen**

The ERIS Vapor Encroachment (VEC) Screen search of available records did not identify any potential VEC sites within the appropriate search radiuses of the subject property. Based on the results of the VEC screen, a VEC does not exist in connection with the subject property. The ERIS Vapor Encroachment Screen report dated April 2, 2020 is located in **Appendix F** and maintained on file at JEI.

### **4.3 Physical Setting**

According to the USDA Soil Conservation Service's Web Soil Survey, the subject property is located within the Bellwood clay, 1 to 5 percent slopes, land complex (25.8%), Bellwood clay, 5 to 12 percent slopes, land complex (9.3%), Briley loamy fine sand, 1 to 5 percent, land complex (6.9%), Guyton silt loam, 0 to 1 percent slopes, frequently flooded land complex (10.2%), Moreland clay, 0 to 1 percent slopes, frequently flooded land complex (7.7%), and Sacul fine loam, 5 to 12 percent slopes, land complex (40.1%); see **Appendix A - Figure 11**. Small areas of other soil with different properties may be included with this soil. The Bellwood clay, 1 to 5 percent slopes, land complex has a mean annual precipitation of 47 to 63 inches and a mean annual air temperature of 55 to 77 degrees F. The frost-free period is 228 to 289 days and all areas are considered not prime farmland. The typical profile is silty clay loam from 0 to 1 inches and silty clay from 6 to 80 inches. The depth to restrictive feature is more than 80 inches and the

drainage is considered somewhat poorly drained. The depth to water table is about 24 to 48 inches and the frequency of flooding is none. There is high (about 9.6 inches) available water storage in the profile. The Bellwood clay, 5 to 12 percent slopes, land complex has a mean annual precipitation of 47 to 63 inches and a mean annual air temperature of 55 to 77 degrees F. The frost-free period is 228 to 289 days and all areas are considered not prime farmland. The typical profile is very fine sandy loam from 0 to 2 inches and clay from 2 to 60 inches. The depth to restrictive feature is more than 80 inches and the drainage is considered somewhat poorly drained. The depth to water table is about 24 to 48 inches and the frequency of flooding is none. There is high (about 9.6 inches) available water storage in the profile. The Briley loamy fine sand, 1 to 5 percent slopes, land complex has a mean annual precipitation of 43 to 60 inches and a mean annual air temperature of 57 to 68 degrees F. The frost-free period is 200 to 275 days and all areas are considered not prime farmland. The typical profile is loamy fine sand 0 to 22 inches and sandy clay loam 22 to 80 inches. The depth to restrictive feature is more than 80 inches and the drainage is considered well drained. The depth to water table is more than 80 inches and the frequency of flooding is none. There is a high (about 8.7 inches) available water storage in the profile. The Guyton silt loam, 0 to 1 percent slopes, frequently flooded land complex has a mean annual precipitation of 42 to 61 inches and a mean annual air temperature of 61 to 67 degrees F. The frost-free period is 190 to 290 days and all areas are considered not prime farmland. The typical profile is silt loam 0 to 19 inches, silty clay loam 19 to 73 inches, and silt loam 73 to 80 inches. The depth to restrictive feature is more than 80 inches and the drainage is considered poorly drained. The depth to water table is about 0 inches and the frequency of flooding is frequent. There is a high (about 12.0 inches) available water storage in the profile. The Moreland clay, 0 to 1 percent, frequently flooded land complex has a mean annual precipitation of 42 to 61 inches and mean annual air temperature of 54 to 77 degrees F. The frost-free period is 219 to 276 days and all areas are considered not prime farmland. The typical profile is clay 0 to 80 inches. The depth to restrictive feature is more than 80 inches and the drainage is somewhat poorly drained. The depth to water table is about 0 inches and the frequency of flooding is none. There is a low (about 5.4 inches) available water storage in the profile. The Sacul fine sandy loam, 5 to 12 percent slopes land complex has a mean annual precipitation of 52 to 59 inches and a mean annual air temperature of 63 to 66 degrees F. The frost-free period is 210 to 252 days and all areas are considered not prime farmland. The typical profile is fine sandy loam 0 to 6 inches, clay 6 to 42 inches, and clay loam 42 to 80 inches. The depth to restrictive feature is more than 80 inches and the drainage is moderately well drained. The depth to water table is about 24 to 48 inches and the frequency of flooding is none. There is a high (about 9.7 inches) available water storage in profile; Supporting documentation is provided in **Appendix C**.

## 4.4 Historical Use Information on the Property

### 4.4.1 USGS Topographic Maps

JEI inspected topographical maps available from the ERIS database. Topographical maps, **Figures 1-4** located in **Appendix A**, were inspected. The current USGS Natchitoches South (2015), 7.5-minute topographic map, shows the contour of the area to be relatively flat. No apparent *recognized environmental conditions* were evident in these topographical maps.

### 4.4.2 Aerial Photographs

Aerial photographs available from the ERIS database, **Figures 5-11** located in **Appendix A**, were inspected. No apparent *recognized environmental conditions* were evident in these aerial photographs.

1940-1952 (**Appendix A, Figure 5-6**) – These aerial photographs depict the subject property as undeveloped with no structures located on the subject property. Highway 478 is developed to the east of the property. A road is depicted across the northwest portion of the subject property. All areas around the subject property are depicted as undeveloped. There were no apparent *recognized environmental conditions* noted in these aerial photographs.

1976-1998 (**Appendix A, Figure 7-8**) – These aerial photographs depict the subject property as undeveloped with no structures of the subject property. Residential houses are depicted adjoin to the southeast of the subject property. There were no apparent *recognized environmental conditions* noted in these aerial photographs.

2005 (**Appendix A, Figure 9**) – This aerial photograph depicts the subject property as undeveloped with the western portion of the property cleared. There were no apparent *recognized environmental conditions* noted in this aerial photograph.

2015-2019 (**Appendix A, Figures 10-11**) – These aerial photographs depict the subject property as undeveloped with no structures on the subject property. The eastern portion of the property is cleared. A road is depicted to go through the northeast portion of the subject property. There are no apparent *recognized environmental conditions* noted in these aerial photographs.

#### **4.4.3 City Directories**

City Directories for the subject property and surrounding properties located at Highway 478, Natchitoches, Natchitoches Parish, Louisiana 71457, were not provided from the ERIS database. Based on the undeveloped nature of the subject property and the surrounding properties, the city directory search should not be considered a data gap.

#### **4.4.4 Sanborn Maps**

Certified Sanborn® Fire Insurance Maps were not provided through ERIS for the subject property.

## **5.0 SITE RECONNAISSANCE**

### **5.1 Methodology and Limiting Conditions**

During the site reconnaissance visit, the subject property was visually inspected for evidence of environmental contamination, degradation, and potential environmental hazards. The inspection was performed by Michael Trammel, JEI Environmental Specialist, on March 24, 2020.

### **5.2 General Site Setting**

The subject property consists of approximately 155 acres of undeveloped land with an approximate center of latitude 31°39'32" North and longitude 93°06'23" West off State Highway 478, Natchitoches, Natchitoches Parish, Louisiana 71457. The subject property is currently undeveloped with no structures on the subject property. According to Mr. Paul Ferrell on behalf of Mossy Oak Properties, the property is undeveloped and has never been developed. The adjoining property to the east consists of State Highway 478 followed by undeveloped land and residential properties. The adjoining properties to the north, west, and south consist of undeveloped land. The assessment was completed on the property as per the legal description included in **Appendix D** of this report.

### **5.3 Hazardous Substances and Petroleum Products**

JEI did not observe any signs of hazardous substances and/or petroleum products on accessible areas of the subject property.

### **5.4 Unidentified Substance Containers**

JEI did not observe any unidentifiable substance containers on accessible areas of the subject property.

### **5.5 Storage Tanks**

JEI did not observe any storage tanks on accessible areas of the subject property.

## **5.6 Polychlorinated Biphenyls**

Polychlorinated Biphenyls (PCB's) are complex mixtures of synthetic chlorinated hydrocarbons which have been primarily used in electrical equipment. PCBs have been used in hydraulic systems, oil filled heat transfer systems, and a variety of other products because of their high stability. The Toxic Substances Control Act (TSCA), enacted in 1976, authorized the United States Environmental Protection Agency (US EPA) to regulate PCB's. The US EPA has developed labeling and disposal regulations and rules governing manufacture and use due to adverse health effects caused by PCB's and their persistence in the environment. There was no evidence of any leaking PCB material on accessible areas of the subject property.

## **5.7 Solid Waste Disposal**

JEI did not observe any solid waste disposal on accessible areas of the subject property.

## **5.8 Stains or Corrosion**

No stains and/or corrosion were observed on the concrete pad of the subject property. No signs of distressed and/or stained vegetation were observed on accessible areas of the subject property.

## **5.9 Drains and Sumps**

JEI did not observe any drains and/or sumps on accessible areas of the subject property.

## **5.10 Pits, Ponds, or Lagoons**

JEI did not observe any pits, ponds, or lagoons on the subject property.

## **6.0 INTERVIEWS**

JEI interviewed Mr. Paul Ferrell, on behalf of Mossy Oak Properties, via phone call on March 20, 2020. His remarks about the property are below:

- Mr. Ferrell is a realtor with Mossy Oak Properties.
- The subject property currently is undeveloped and has never been developed.
- He was unaware of any spills, hazardous material releases, or any other environmental concerns regarding the subject property.
- He reported no knowledge or information regarding environmental liens or activity related to environmental hazards on the subject property.

## 7.0 FINDINGS AND CONCLUSIONS

JEI has performed a Phase I Environmental Site Assessment for the approximately 155-acre property located with an approximate center of latitude 31°39'32" North and longitude 93°06'23" West off State Highway 478, Natchitoches, Natchitoches Parish, Louisiana 71457, *the property*. JEI Environmental Specialist, Michael Trammel, made onsite observations of the subject property on March 24, 2020. JEI made the following findings:

- Federal, state, and local environmental agency data was reviewed to determine if the potential for recognized environmental conditions exists at or in the vicinity of the subject property. No NPL, delisted NPL, CERCLIS, CORRACTS-TSD, non-CORRACTS TSD, RCRA, Federal Institutional/Engineering Controls, ERNS, SHWS, SWF/LF, LUST, UST, AUL, VCP, and Brownfields sites were identified within the ASTM-specified search radii for the subject property.
- The ERIS Vapor Encroachment (VEC) Screen search of available records did not identify any potential VEC sites within the appropriate search radiuses of the subject property. Based on the results of the VEC screen, a VEC does not exist in connection with the subject property.

## 8.0 RECOGNIZED ENVIRONMENTAL CONDITIONS

JEI has performed a **Phase I Environmental Site Assessment** in conformance with the scope and limitations of ASTM Practice E1527 of the approximately 155-acre property located with an approximate center of latitude 31°39'32" North and longitude 93°06'23" West off State Highway 487, Natchitoches, Natchitoches Parish, Louisiana 71457, *the property*. Any exceptions to, or deletions from, this practice are described in Section 1.4 of this *report*. This assessment did not identify any *recognized environmental conditions* in connection with the *property*.

## **9.0 DATA GAPS**

Significant data gaps beyond ten-(10) year intervals were not included in this Phase I ESA.

## 10.0 REFERENCES

- **USDA Soil Conservation Service's Soil Survey: Natchitoches Parish Soil Survey, 2020**
- **<http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>**
- **ERIS Database™ Report**
- **Louisiana Department of Environmental Quality's (LDEQ's) Electronic Documents Management System (EDMS)**
- **Louisiana Department of Natural Resources (LDNR): <http://www.dnr.louisiana.gov/>**

**11.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONAL AND ENVIRONMENTAL PROFESSIONAL STATEMENT**

The environmental professionals that have signed below were responsible for completing this Phase I Environmental Site Assessment and Report.

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

Sherron Greer  
Sherron Greer, Environmental Specialist

4/7/20  
Date

[Signature]  
Michael Trammel, Environmental Specialist

4/7/2020  
Date

The undersigned Registered Professional Geoscientist is familiar with the standards and practices set forth in 40 CFR 312 and has visited and examined the *property*, or has supervised the assessment of the *property* by appropriately qualified personnel.

As per the requirements as defined in §1501.3(d) of LAC Title 46, the undersigned Registered Professional Geoscientist, if applicable, has reviewed any geoscientific documents, findings, or conclusions incorporated into this Phase I Environmental Site Assessment and Report.

Bezany Y. Aranaga Branton  
Bezany Y. Aranaga Branton, P. G.  
Registration No. 867  
State of Louisiana

4/7/2020  
Date

