

Exhibit CC.

Daly Farms Site

Phase 1 Environmental Site Assessment



Daly Farms Site Phase I Environmental Site Assessment

PHASE I ENVIRONMENTAL SITE ASSESSMENT



DALY FARM SITE

SOUTHWEST CORNER OF HIGHWAY 182 AND HIGHWAY 178
SUNSET, ST. LANDRY PARISH, LOUISIANA 70584
ECS PROJECT NO. 49:11485

FOR

ONE ACADIANA

APRIL 3, 2020





ECS Southeast, LLP

"Setting the Standard for Service"

Geotechnical • Construction Materials • Environmental • Facilities

April 3, 2020

Zach Hager
One Acadiana
804 East St. Mary Boulevard
Lafayette, Louisiana 70501

ECS Project No. 49: 11485

Reference: Phase I Environmental Site Assessment Report, Daly Farm Site, Southwest Corner of Highway 182 and Highway 178, Sunset, St. Landry Parish, Louisiana 70584

Dear Mr. Hager:

ECS Southeast, LLP (ECS) is pleased to provide you with the results of our Phase I Environmental Site Assessment (ESA) for the referenced site. ECS services were provided in general accordance with ECS Proposal No. 49:17102 authorized on March 25, 2020 and generally meet the requirements of ASTM E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and EPA Standards and Practices for All Appropriate Inquiries contained in 40 CFR Part 312.

If there are questions regarding this report, or a need for further information, please contact the undersigned.

ECS Southeast, LLP

A handwritten signature in blue ink that reads "Bill Penick".

Bill Penick
Senior Project Manager
bpenick@ecslimited.com
225-224-3145

A handwritten signature in blue ink that reads "Justin Roth".

Justin Roth, CHMM
Environmental Principal
jroth@ecslimited.com
843-654-4448

Project Summary

Daly Farm Site
Southwest Corner of Highway 182 and Highway 178
Sunset, Louisiana 70584

Report Section		No Further Action	REC	CREC	HREC	BER	Comment
<u>4.0</u>	User Provided Information	✓					
<u>5.1</u>	Federal ASTM Databases	✓					
<u>5.2</u>	State ASTM Databases	✓					
<u>5.3</u>	Additional Environmental Record Sources	✓					
<u>6.0</u>	Historical Use Information	✓					
<u>7.0</u>	Site and Area Reconnaissance	✓					
<u>8.0</u>	Additional Services	✓					
<u>9.0</u>	Interviews	✓					

ENVIRONMENTAL PROFESSIONAL STATEMENT

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in § 312.10 of 40 CFR 312. 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.



Bill Penick
Senior Project Manager
April 3, 2020



Justin Roth, CHMM
Environmental Principal
April 3, 2020

TABLE OF CONTENTS**PAGE**

1.0	EXECUTIVE SUMMARY	1
1.1	Opinion	2
2.0	INTRODUCTION	3
2.1	Purpose and Reason for Performing Phase I ESA	3
2.2	Scope of Services	3
2.3	Definitions	3
2.4	Limitations	4
2.5	Data Gaps	5
2.6	Limiting Conditions/Deviations	5
3.0	SUBJECT PROPERTY DESCRIPTION	6
3.1	Subject Property Location and Legal Description	6
3.2	Physical Setting and Hydrogeology	6
3.3	Current Use and Description of the Site	7
4.0	USER PROVIDED INFORMATION	8
4.1	Title Information	8
4.2	Environmental Liens or Activity and Use Limitations	8
4.3	Specialized Knowledge	8
4.4	Commonly Known or Reasonably Ascertainable Information	8
4.5	Valuation Reduction for Environmental Issues	8
4.6	Owner, Property Manager, and Occupant Information	8
4.7	Degree of Obviousness	9
5.0	RECORDS REVIEW	10
5.1	Federal ASTM Databases	11
5.2	State ASTM Databases	11
5.2.1	Registered Underground Storage Tank (UST) List	11
5.3	Additional Environmental Record Sources	12
5.3.1	Additional Non-ASTM Federal Databases	12
5.3.2	Additional Non-ASTM State Databases	12
5.3.2.1	NPDES Permits	12
5.3.3	Other Proprietary Databases	12
5.3.4	Unmapped (Orphan) Facilities and Sites	12

5.4	Regulatory Review Summary	13
6.0	HISTORICAL USE INFORMATION	14
6.1	Aerial Photograph Review	14
6.2	Sanborn Fire Insurance Map Review	14
6.3	Property Tax Files	15
6.4	Recorded Land Title Records	15
6.5	Historical USGS Topographic Maps	15
6.6	City Directory Review	17
6.7	Building Department Records	19
6.8	Zoning/Land Use Records	20
6.9	Other Historical Sources	20
6.10	Previous Reports	20
6.11	Historical Use Summary	20
7.0	SITE AND AREA RECONNAISSANCE	21
7.1	Methodology	21
7.2	On-Site Features	21
7.3	Adjoining and Nearby Properties	22
7.4	Site and Area Reconnaissance Summary	22
8.0	ADDITIONAL SERVICES	23
9.0	INTERVIEWS	24
10.0	FINDINGS AND CONCLUSIONS	25
10.1	Opinion	26
11.0	REFERENCES	27

TABLE OF APPENDICES

Appendix I: Figures

Appendix II: Correspondence and User Questionnaire

Appendix III: Regulatory Records Documentation

Appendix IV: Historical Research Documentation

Appendix V: Site Photographs

Appendix VI: Statement of Qualifications

Appendix VII: Acronyms

1.0 EXECUTIVE SUMMARY

ECS Southeast, LLP (ECS) was contracted by One Acadiana to perform an ASTM E1527-13, Phase I Environmental Site Assessment (ESA) of the Daly Farm Site located on the southwest corner of Highway 182 and Highway 178 in Sunset, St. Landry Parish, Louisiana (i.e. subject property). This Executive Summary is an integral part of the Phase I ESA report. ECS recommends that the report be read in its entirety.

The subject property is identified by the St. Landry Parish Online GIS system as Parcel Identification Numbers (PINs) 0104282500 and 0104282000 and owned by Daly Farms, LLC. The approximately 105-acre subject property is mainly agricultural land and partially wooded land in a rural area of Sunset, St. Landry Parish, Louisiana.

The subject property is located in a rural area of Sunset, Louisiana. The subject property is bound on the north by Highway 178 followed by residential development, on the east by Highway 182 followed by Kappy's Korner Store and agricultural land, on the south by partially, wooded land followed by residential development and mainly grass-covered land, and on the west by undeveloped, wooded land and Bourdeux Bayou followed by residential development. ECS did not identify environmental issues at adjoining or nearby properties that are believed to present a recognized environmental condition (REC) at the subject property.

Based on the records search, site reconnaissance and interviews, it appears that the subject property was mainly grass-covered land with residential development on the northern section from at least 1957 until 1998. From 2004 through 2017, the subject property is mainly grass-covered land in a rural setting. Historical records prior to 1957 were not reasonably ascertainable for the subject property.

Our review of historical information for adjoining or nearby properties identified the area as originally mainly grass-covered land and partially, wooded land that transitioned to commercial and residential development to the north, south, east, and west of the subject property.

A regulatory database search report was provided by Environmental Data Resources (EDR). The database search involves researching a series of Federal, State, Local, and other databases for facilities and properties that are located within specified minimum search distances from the subject property. The report did not identify the subject property on the databases researched. The EDR report identified two off-site properties within the minimum ASTM search distances. Kappy's Korner Store and Jay's Store was listed on the UST database. Based on our review of available public records, the distance in relation to the subject property, and the topographic location, none of the listings are believed to represent a REC for the subject property.

ASTM E1527-13 defines a "data gap" as: "a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information." The historical documents did not go back to 1940, representing a data gap failure. However, due to the historical use and the current use of the subject property, the data gap failure does not render a professional opinion concerning the subject property.

We have performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM E1527-13 of the Daly Farm Site located at Southwest Corner of Highway 182 and Highway 178 in Sunset, St. Landry Parish, Louisiana. Exceptions to, or deletions from, this practice are described in Section 2.6 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property.

1.1 Opinion

It is the opinion of ECS that additional assessment of this site is not warranted at this time.

2.0 INTRODUCTION

2.1 Purpose and Reason for Performing Phase I ESA

The purpose of the ESA was to:

- evaluate the probability of impact to the surface water, groundwater and/or soils within the property boundaries through a review of regulatory information and a reconnaissance of the subject property and vicinity;
- evaluate historical land usage to identify previous conditions that could potentially impact the environmental condition of the subject property;
- conduct all appropriate inquiry as defined by ASTM E1527-13 and 40 CFR Part 312;
- evaluate the potential for on-site and off-site contamination; and,
- provide a professional opinion regarding the potential for environmental impact at the site and a list of Recognized Environmental Conditions (RECs).

The ESA should allow the Users the opportunity to qualify for landowner liability protection under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) provided certain stipulations are met. The landowner liability protections are: an innocent landowner, a contiguous property owner, or a bona fide prospective purchaser. The User must meet the protection stipulations detailed in CERCLA to qualify as well as meet the User Obligations contained within the ASTM E1527- 13 standard.

The reason for conducting this ESA is to perform all appropriate inquiries into the uses and prior ownership of the subject property to be completed as part of the State of Louisiana Certified Site Program.

2.2 Scope of Services

The environmental assessment was conducted in general accordance with ASTM E1527-13 and EPA Standards and Practices for All Appropriate Inquiry (40 CFR §312.10). The environmental assessment was conducted under the supervision or responsible charge of an individual that qualifies as an environmental professional, as defined in 40 CFR §312.10.

ECS was contracted by One Acadiana to perform an ASTM E1527-13, Phase I Environmental Site Assessment (ESA) of the Daly Farm Site located at Southwest Corner of Highway 182 and Highway 178 in Sunset, St. Landry Parish, Louisiana. ECS was not contracted to address non-scope considerations.

2.3 Definitions

ASTM E1527-13 defines a "recognized environmental condition (REC)" as "the presence or likely presence of any hazardous substances or petroleum products in, on or at a property: 1) due to release to the environment, 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment." For the purposes of this practice, "migrate" and "migration" refer to the movement of hazardous substances or petroleum products in any form including solid and liquid at the surface or subsurface and vapor in the subsurface.

ASTM E1527-13 defines a "business environmental risk" (BER) as "a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice". ECS also uses the term "Other Environmental Considerations" to discuss BERs and environmental concerns outside of the ASTM E1527-13 requirements (radon, asbestos, lead, wetlands, etc.). Client-imposed limitations and site condition limitations, if encountered, are detailed in Section 7.1 Methodology and Limiting Conditions.

ASTM E1527-13 defines a "*de minimis* condition" as a condition that generally does not represent 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. De minimis conditions are not recognized environmental conditions nor controlled recognized environmental conditions.

ASTM E1527-13 defines a "controlled recognized environmental condition (CREC)" as a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example property use restrictions, activity and use limitations, institutional controls, or engineering controls). A condition identified as a controlled recognized environmental condition does not imply that the Environmental Professional has evaluated or confirmed the adequacy, implementation or continued effectiveness of the required control that has been, or is intended to be, implemented.

ASTM E1527-13 defines a "historical recognized environmental condition (HREC)" as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted residential use criteria established by a regulatory authority, without subjecting the property to any required controls (for example property use restrictions, activity and use limitations, institutional controls, or engineering controls). Before calling the past release a historical recognized environmental condition, the Environmental Professional must determine whether the past release is a recognized environmental condition at the time the Phase I Environmental Site Assessment is conducted (for example, if there has been a change in the regulatory criteria).

2.4 Limitations

The ESA involved a reconnaissance of the subject property and contiguous properties and a review of regulatory and historical information in general accordance with the ASTM standard and EPA regulation referenced herein. No non-scope considerations or additional issues such as asbestos, radon, wetlands or mold were investigated, unless otherwise described in Section 8.0 of this report.

Note: vapor migration in the subsurface is described in Guide E2600 published by ASTM. ECS has not conducted a Vapor Encroachment Screen in accordance with the E2600 guide.

The conclusions and/or recommendations presented within this report are based upon a level of investigation consistent with the standard of care and skill exercised by members of the same profession currently practicing in the same locality under similar conditions. The intent of this assessment is to identify the potential for recognized environmental conditions in connection with the subject property; however, no environmental site assessment can completely eliminate uncertainty regarding the potential for recognized environmental conditions in connection with the subject property. The findings of this ESA are not intended to serve as an audit for health and safety compliance issues pertaining to improvements or activities at the subject property. ECS is not liable for the discovery or elimination of hazards that may potentially cause damage, accidents or injury.

Observations, conclusions and/or recommendations pertaining to environmental conditions at the subject property are necessarily limited to conditions observed, and or materials reviewed at the time this study was undertaken. It was not the purpose of this study to determine the actual presence, degree or extent of contamination, if any, at this subject property. This could require additional exploratory work, including sampling and laboratory analysis. No warranty, expressed or implied, is made with regard to the conclusions and/or recommendations presented within this report.

This report is provided for the exclusive use of One Acadiana. This report is not intended to be used or relied upon in connection with other projects or by other unidentified third parties. The use of this report by any undesignated third party or parties will be at such party's sole risk and ECS disclaims liability for any such third party use or reliance.

2.5 Data Gaps

Data failures (historical data gaps) were identified during the historical research of this subject property. Use of the subject property was generally documented back to 1957. The historical documents did not go back to 1940, representing a data gap failure. However, due to the apparent historical residential use, the present use, and the other information that was obtained about the subject property; the historical data gaps are not expected to impact our ability to render a professional opinion regarding the subject property.

2.6 Limiting Conditions/Deviations

ASTM E1527-13 requires that the Environmental Professional identify limiting conditions, deletions, and deviations from the ASTM E1527-13 standard, if any, including client-imposed constraints.

Limiting conditions and/or deviations from the standard practice that would be expected to impact our ability to provide a professional opinion concerning the subject property were not encountered during the performance of this Phase I ESA.

3.0 SUBJECT PROPERTY DESCRIPTION

3.1 Subject Property Location and Legal Description

Site Name	Daly Farm Site
Property Address	Southwest Corner of Highway 182 and Highway 178
Property City, State	Sunset, Louisiana
Property County	St. Landry Parish
Number of Parcels	Two
Property ID Number(s)	0104282500 and 0104282000
Property Size	105 Acres
Property Owner of Record	Daly Farms, LLC
Property Legal Description	Parcel #0104282500 - 187.30 AC N ROAD S COURVILLE E GUILBEAU W WILLIAMS IN SEC 174 175 T-7S R-4E 1168100 Parcel # 0104282000 - 97.50 AC N DALY S LAVERGNE E BY BOURBEAU W ROAD IN SEC 175 T-7S R4E 1168100

3.2 Physical Setting and Hydrogeology

USGS Topographic Map	
Quad Designation	Sunset, Louisiana
Date	2012
Subject Property Settings	
Average Subject Property Elevation (in feet or meters)	53 feet above sea level
General Sloping Direction	East
Bodies of Water	None
General Directions of Surface Flow	East
Presumed Direction of Groundwater Flow	East
Geologic Province	Era: Cenozoic, System: Quaternary, Series: Pleistocene, Code: Qp (decoded as era, system, and series), Category: Stratified Sequence
Up-gradient Property Direction	West

Nearby Properties' Setting	
General Sloping Direction	East
Bodies of Water	Bourbeux Bayou is located approximately 75 feet to the west of the subject property.
General Directions of Surface Flow	East
Presumed Direction of Groundwater Flow	East

Regional influences may have an impact on groundwater flow. The actual groundwater flow direction cannot be determined without site-specific information obtained through the gauging of groundwater monitoring wells.

3.3 Current Use and Description of the Site

The subject property consists of an approximately 105-acre parcel of land that is currently plowed up farm land and partially, wooded land in a rural area of Sunset, Louisiana. The subject property is located in an area that can generally be described as rural. According to the United States Natural Resources Conservation Services Web Soil Survey, the soil types at the subject property are the Calhoun silt loam (Cc), 0 to 1 percent slopes, the Coteau silt loam (Co), 0 to 1 percent slopes, the Coteau silt loam (Cp), 1 to 3 percent slopes, and the Frost silt loam (FrA), 0 to 1 percent slopes. The Calhoun silt loam and the Frost silt loam are on the high end of the hydric scale and the Coteau silt loams are on the low end of the hydric scale.

4.0 USER PROVIDED INFORMATION

The ASTM standard includes disclosure and obligations of the User to help the Environmental Professional identify the potential for Recognized Environmental Conditions associated with the subject property. The ASTM E1527-13 User Questionnaire was submitted to and completed by Zach Hager, representing One Acadiana (User of the report). Section 4.0 is based on the completed User Questionnaire. A copy of the completed User Questionnaire is included in Appendix II.

4.1 Title Information

ECS was not provided with title information by the User. If this information is provided following issuance of this report and information contained therein materially changes the outcome of this report, ECS will issue an addendum to this report.

4.2 Environmental Liens or Activity and Use Limitations

ECS was neither contracted to obtain information on environmental liens or activity and use limitations, nor have we been provided with information on environmental liens or activity and use limitations for our review. It should be noted by the User of this report that if the User does not obtain activity and use limitation information, the User that is seeking to qualify for an innocent landowner, a contiguous property owner, or a bona fide prospective purchaser liability defense may lose these rights to qualify under CERCLA. If the activity and use information is provided following issuance of this report and information contained therein materially changes the outcome of this report, ECS will issue an addendum to this report. The User stated they were not aware of any AULs associated with the subject property.

4.3 Specialized Knowledge

The User indicated that they did not possess specialized knowledge of the subject property.

4.4 Commonly Known or Reasonably Ascertainable Information

The User indicated that they were not aware of commonly known environmental concerns related to the subject property.

4.5 Valuation Reduction for Environmental Issues

According to the User, the purchase price being paid for the subject property reasonably reflects its fair market value.

4.6 Owner, Property Manager, and Occupant Information

The current owner is Mr. Andre Bordelon and his number is 337-308-3471 and his email is aborde@bellsouth.net.

4.7 Degree of Obviousness

The User stated that they were not aware of obvious indicators that point to the presence or likely presence of contamination at the subject property.

5.0 RECORDS REVIEW

A regulatory records search of ASTM standard and supplemental databases was conducted for the subject property and is included in Appendix III. The regulatory search report in the appendix includes additional details about the regulatory databases that were reviewed. The regulatory records search involves searching a series of databases for facilities that are located within a specified distance from the subject property. The ASTM standard specifies an approximate minimum search distance from the subject property for each database. Pursuant to ASTM, the approximate minimum search distance may be reduced for each standard environmental record except for Federal NPL site list, and Federal RCRA TSD list. According to ASTM, government information obtained from nongovernmental sources may be considered current if the source updates the information at least every 90 days or, for information that is updated less frequently than quarterly by the government agency, within 90 days of the date the government agency makes the information available to the public. The following table indicates the standard environmental record sources and the approximate minimum search distances for each record.

Standard Environmental Record Sources	Approximate Minimum Search Distance Per ASTM (miles)	Subject Property	Off-Site Properties
Federal NPL	1.0	No	0
Federal Delisted NPL	0.5	No	0
Federal CERCLIS	0.5	No	0
Federal CERCLIS NFRAP	0.5	No	0
Federal RCRA CORRACTS	1.0	No	0
Federal RCRA non-CORRACTS TSD	0.5	No	0
Federal RCRA Generators	Subject Site and Adjoining Properties	No	0
Federal IC/EC	Subject Site Only	No	N/A
Federal ERNS	Subject Site Only	No	N/A
State and Tribal Hazardous Waste Sites (NPL Equivalent)	1.0	No	0
State and Tribal Hazardous Waste Sites (CERCLIS Equivalent)	0.5	No	0
State and Tribal Landfill and/or solid waste disposal sites	0.5	No	0

Standard Environmental Record Sources	Approximate Minimum Search Distance Per ASTM (miles)	Subject Property	Off-Site Properties
State and Tribal Leaking Tanks	0.5	No	0
State and Tribal Registered UST and AST	Subject Site and Adjoining Properties	No	2
State and Tribal IC/EC	Subject Site Only	No	N/A
State and Tribal Voluntary Cleanup (VCP)	0.5	No	0
State and Tribal Brownfield Sites	0.5	No	0

Based on our knowledge of the subject property and the surrounding area, ECS attempts to verify and interpret this data. While this attempt at verification is made with due diligence, ECS cannot guarantee the accuracy of the record(s) search beyond that of information provided by the regulatory report(s). ECS makes no warranty regarding the accuracy of the database report information included within the regulatory report(s).

The regulatory database search was performed by Environmental Data Resources (EDR), dated March 25, 2020. ECS did not reduce the minimum ASTM search distances stipulated in the standard. The regulatory databases reviewed by ECS included supplemental databases researched by EDR.

5.1 Federal ASTM Databases

Neither the subject property nor properties within the designated search radii were identified on the federal databases researched for this assessment.

5.2 State ASTM Databases

5.2.1 Registered Underground Storage Tank (UST) List

The Registered UST List inventories underground storage tanks registered with the state. This list does not identify USTs that have not been registered or are exempt, such as home heating oil tanks and other unregulated tanks.

One or more off-site properties within the minimum search distance of inquiry was reported as being on the UST database.

- **Hamani Oil Inc, - Kappy's Korner** - The facility is located at 3512 Highway 182 in Opelousas, Louisiana and is located approximately 120 feet to the northeast and topographically down-gradient and lower in elevation of the subject property. The facility was listed on the UST database for maintaining two (2) 1,000-gallon underground storage tanks (USTs) for the storage of gasoline that were installed in 1965 and 1968. The USTs,

dispensers, and piping were removed in 2005 by the previous owner. The Louisiana Department of Environmental Quality (LDEQ) performed an inspection of the site and found that the USTs, piping, and dispensers had been removed and closed and removed the USTs from their database. Due to the down-gradient location and the USTs being removed, the USTs are not considered to be evidence of a REC in connection with the subject property.

- **Ahraf and Brothers Inc.-Jay's** - The facility is located at 2939 Highway 182 in Sunset, Louisiana and is located approximately 1,000 feet to the southeast of the subject property and topographically down-gradient of the subject property. The facility was listed on the UST database for maintaining two (2) 4,000-gallon USTs for the storage of gasoline that were installed in 1978 and closed and removed in 1987. In 1993, two (2) 8,000-gallon USTs were installed for the storage of gasoline and diesel and are currently active. Due to the distance in relation to the subject property and the down-gradient location to the subject property, the facility is not considered to be evidence of a REC in connection with the subject property.

5.3 Additional Environmental Record Sources

5.3.1 Additional Non-ASTM Federal Databases

Neither the subject property nor properties within the designated search radii were identified on the federal databases researched for this assessment.

5.3.2 Additional Non-ASTM State Databases

5.3.2.1 NPDES Permits

General information regarding NPDES (National Pollutant Discharge Elimination System) permits.

According to the LDEQ-Electronic Document Management System (EDMS), the Kappy's Korner store maintained a Louisiana Pollutant Discharge Elimination System (LPDES) General Permit for the discharge of treated sanitary wastewater of no more than 60-gallons per day. The permit number is LAG-535443. There were no violations reported against the facility. Due to the nature of the permit and the lack of violations, the facility is not considered to be evidence of a REC in connection with the subject property.

5.3.3 Other Proprietary Databases

Neither the subject property nor properties within the designated search radii were identified on the proprietary databases researched for this assessment.

5.3.4 Unmapped (Orphan) Facilities and Sites

One (1) property was identified on the Orphan Summary List. The St. Landry Parish - George Thompson site was listed on the Solid Waste Facility/Landfill Sites (SWF/LF) and Debris databases. The facility was located approximately nine (9) miles to the northeast of the subject property. Due to the distance in relation to the subject property, the facility is not considered to be evidence of a REC in connection with the subject property.

5.4 Regulatory Review Summary

A regulatory database search report was provided by Environmental Data Resources (EDR). The database search involves researching a series of Federal, State, Local, and other databases for facilities and properties that are located within specified minimum search distances from the subject property. The report did not identify the subject property on the databases researched. The EDR report identified two off-site properties within the minimum ASTM search distances. Kappy's Korner Store and Jay's Store was listed on the UST database. Based on our review of available public records, the distance in relation to the subject property, and the topographic location, ECS does not consider the listings to be potential sources of soil, groundwater or vapor impact to the subject property. Therefore, ECS does not consider the listed sites to be RECs for the subject property.

6.0 HISTORICAL USE INFORMATION

6.1 Aerial Photograph Review

ECS reviewed aerial photographs of the subject property and immediately surrounding properties for evidence of former usage which may indicate potential environmental issues. The aerial photographs were obtained from Environmental Data Resources (EDR). The aerial photographs reviewed were dated 1969, 1974, 1981, 1985, 1990, 2004, 2007, 2010, 2013, and 2017. Aerial photographs dated prior to 1969 were not available for review. The ECS review is dependent on the quality and scale of the photographs. The following is a description of relevant information from the aerial photographs:

Year(s)	Subject Property	Adjoining Properties	REC? (yes or no)
1969, 1974, 1981, 1985, and 1990	The subject property was mainly grass-covered land and residential development on the northern section.	North - A road followed by residential development. East - A road followed by commercial development and mainly grass-covered land and partially, wooded land. South - Mainly grass-covered land followed by residential development then a road. West - A bayou followed by mainly grass-covered land and residential development.	No
2004, 2007, 2010, 2013, and 2017	The subject property is mainly grass-covered land and partially, wooded land in a rural setting.	North - A road followed by residential development. East - A road followed by commercial development and mainly grass-covered land and partially, wooded land. South - Residential development and grass-covered land then a road. West - A bayou followed by partially, wooded land and residential development.	No

6.2 Sanborn Fire Insurance Map Review

In an effort to identify past uses, ECS utilized Environmental Data Resources (EDR) to search for historical Sanborn Fire Insurance Maps (Sanborn) for the subject property and surrounding area. Sanborn maps were not available for this area. The absence of such maps generally indicates that the

subject property is located in an area where Sanborn maps were not produced because the area was rural or it was not economically feasible. ECS does not expect the lack of Sanborn maps to impact our ability to render a professional opinion concerning the subject property given the amount of historical information obtained from our research, the USGS topographic map, aerial photographs, city directories, and other historical records obtained. A copy of the Unmapped Property report is included within Appendix IV.

6.3 Property Tax Files

Property tax files may include records of past ownership, appraisals, maps, sketches, photos or other information kept by the local jurisdiction for property tax assessment purposes. According to the St. Landry Parish tax assessor on-line information, the subject property is owned by Daly Farms, LLC. The subject property is listed as a 105-acre parcel with identification numbers of 0104282500 and 0104282000.

6.4 Recorded Land Title Records

Recorded land title records may include leases, land contracts, and AULs recorded by the local jurisdiction. Land title records may provide only a list of the names of previous owners and may be of limited use; however, they may provide useful information about uses or occupancy of the property when employed in combination with other sources.

ECS was not provided with Land Title Records.

6.5 Historical USGS Topographic Maps

Topographic maps are produced by the United States Geological Survey (USGS) for various time periods. ECS reviewed topographic maps of the subject property and immediately surrounding properties for evidence of former usage which may indicate potential environmental issues. The topographic maps were obtained from EDR and were dated 1957, 1970, 1983, 1998, and 2012. Topographic maps dated prior to 1957 were not available for review. The following is a description of relevant information from the topographic maps:

Year(s)	Subject Property	Adjoining Properties	REC? (yes or no)
1957	Cleared, vacant land and developed land with a structure on the northern section in a rural setting.	North - A road followed by developed land with structures. East - A road followed by developed land with a structure and cleared, vacant land. South - Cleared, vacant land and partially, wooded land followed by developed land with structures. West - Developed land with structures followed by Bayou Bourbeux then cleared, vacant land.	No
1970	Cleared, vacant land in a rural setting.	North - Highway 178 followed by developed land with structures. East - A road followed by developed land with a structure and cleared, vacant land. South - Cleared, vacant land and partially, wooded land followed by developed land with structures then a road. West - Developed land with structures followed by Bayou Bourbeux then cleared, vacant land.	No
1983	Cleared, vacant land and developed land with a structure on the northern section in a rural setting.	North - Highway 178 followed by developed land with structures. East - Highway 182 followed by developed land with a structure and cleared, vacant land. South - Cleared, vacant land and partially, wooded land followed by developed land with structures then a road. West - Cleared, vacant land followed by Bayou Bourbeux then cleared, vacant land.	No

Year(s)	Subject Property	Adjoining Properties	REC? (yes or no)
1998	Cleared, vacant land and developed land with a structure on the northern section in a rural setting.	North - Highway 178 followed by developed land with structures. East - Highway 182 followed by developed land with a structure and cleared, vacant land. South - Cleared, vacant land and partially, wooded land followed by developed land with structures then a road. West - Developed land with structures followed by Bayou Bourbeux then cleared, vacant land.	No
2012	Cleared, vacant land in a rural setting.	North - Highway 178 followed by cleared, vacant land. East - Highway 182 followed cleared, vacant land then undeveloped, wooded land. South - Cleared, vacant land and partially, wooded land followed by a road. West - Cleared, vacant land followed by Bayou Bourbeux then cleared, vacant land.	No

6.6 City Directory Review

One of the ASTM standard historical sources to be reviewed for previous subject property uses is local street directories, commonly known as City Directories. The purpose of the directory review is to identify past occupants of the subject property, adjoining properties, or nearby properties. In some rural areas, street directories information is limited.

ECS reviewed city directories obtained from Environmental Data Resources (EDR). The directories reviewed were dated 2000, 2005, 2010, 2014, and 2017. The directories reviewed prior to 2000 did not provide listings for the subject property or surrounding area. Directories dated prior to 2000 were not available for review. The subject property address utilized for the research was Southwest Corner of Highway 182 and Highway 178. A copy of the city directory report is included in Appendix IV. The following is a description of relevant information from the city directories:

Year(s)	Subject Property	Adjoining Properties	REC? (yes or no)
2000	No Listing	North - Residential Listing - J DVM Smith, Paula Cornette, Cynthia Sutura, and Aaron Nugent East - Residential Listing - Angela Accardo and Vernon Baum South - Residential Listing - Larry Goodale, George Walker, and Joel Devalcourt, Commercial Listing - Firewalker Saloon, Sunset Saloon, and Rowena's Grocery and Meat Market West - Residential Listing - Ronald Bennett and Mary Bennett	No
2005	No Listing	North - Residential Listing - Harry Mayfield, Steven Nezat, Accursio Sutura, and Aaron Nugent East - Residential Listing - Leonard Savoy and Mario Accardo South - Residential Listing - Amanda Hubbs, George Walker, and Joel Devalcourt, Commercial Listing - Eddie B's West - Residential Listing - Don Williams and Mary Bennett	No
2010	No Listing	North - Residential Listing - Seymour Smith, Steven Nezat, Randy Champagne, Accursio Sutura, and Aaron Nugent East - Residential Listing - Leonard Savoy, Earl Bertinot, Herman Savoy, and James Baum South - Residential Listing - Perry Hubbs, George Walker, and Joel Devalcourt, Commercial Listing - Eddie B's and Cherrie's Florist West - Residential Listing - Don Williams and Carol Hall	No

Year(s)	Subject Property	Adjoining Properties	REC? (yes or no)
2014	No Listing	North - Residential Listing - Mary Monroe, J DVM Smith, Jean Smith, Accursio Sutera, John Gray and Aaron Nugent East - Residential Listing - Leonard Savoy, Danzel Pryor and James Baum South - Residential Listing - Perry Hubbs, George Walker, and Joel Devalcourt, Commercial Listing - Eddie B's, SWHEI Shaide and Cherrie's Florist West - Residential Listing - Don Williams and Carol Hall	No
2017	No Listing	North - Residential Listing - Rachel Pawlowski, Jean Smith, Accursio Sutera, Linda Moreau, and Aaron Nugent, Commercial Listing - Nezat's Air Conditioning and Refrigeration East - Residential Listing - Leonard Savoy, Danzel Pryor and James Baum South - Residential Listing - Perry Hubbs and George Walker, Commercial Listing - Eddie B's, SWHEI Shaide and Cherrie's Florist West - Residential Listing - Don Williams, John Cothern and Carol Hall	No

6.7 Building Department Records

The term building department records means those records of the local government indicating permissions of the local government to construct, alter or demolish improvements on the property.

ECS reviewed the St. Landry Parish Building Department Records and found no records on the subject property.

6.8 Zoning/Land Use Records

The term zoning/land use records refers to records of the local government indicating the uses permitted by the government in particular zones within its jurisdictions.

ECS reviewed the St. Landry Parish Zoning Department and found that the subject property is listed as agricultural land in a rural setting.

6.9 Other Historical Sources

The historical documents reviewed and reported previously in this section are those that were reasonably ascertainable at the time of this assessment and those expected to yield useful information; therefore, no additional historical research was conducted.

6.10 Previous Reports

We have not been provided with environmental or engineering assessment reports for the subject property completed by others.

6.11 Historical Use Summary

According to historical research, the subject property has been mainly grass-covered land with residential development on the northern section from 1957 to 1998 and mainly grass-covered land in a rural setting from 2004 to 2017 and the area has developed slowly from a primarily grass-covered land to residential and commercial development to the north, east, south, and west.

No obvious indications of RECs were identified in the historical data review.

7.0 SITE AND AREA RECONNAISSANCE

7.1 Methodology

Mr. Bill Penick of ECS conducted the field reconnaissance on April 2, 2020. The weather at the time of the reconnaissance was 70 degrees Fahrenheit and clear. Observations were made from a walking reconnaissance around the perimeter and along several transects across the subject property. Subject property photographs are included in Appendix V.

7.2 On-Site Features

The subject property consists of an approximately 105-acre parcel of land that is currently plowed up land and partially, wooded land in a rural area of Sunset, Louisiana.

The table below lists pertinent features of interest that were assessed for the subject property. Relevant information regarding pertinent features is discussed further in this section.

Feature	Yes	No
Underground or aboveground storage tanks		✓
Strong, pungent or noxious odors		✓
Surface waters		✓
Standing pools of liquid likely containing petroleum or hazardous substances		✓
Drums or containers of petroleum or hazardous substances greater than five-gallons		✓
Drums or containers of petroleum or hazardous substances less than or equal to five-gallons		✓
Unidentified opened or damaged containers of hazardous substances or petroleum products		✓
Known or suspect PCB-containing equipment (excluding light ballasts)		✓
Stains or corrosion to floors, walls or ceilings		✓
Floor drains and sump pumps		✓
Pits, ponds or lagoons		✓
Stained soil or pavement		✓
Stressed vegetation		✓
Solid waste mounds or non-natural fill materials		✓
Wastewater discharges into drains, ditches or streams		✓

Feature	Yes	No
Groundwater wells including potable, monitoring, dry, irrigation, injections and/or abandoned		✓
Septic systems or cesspools		✓
Elevators		✓
Dry cleaning		✓
Onsite emergency electrical generators		✓
Specialized industrial equipment (paint booths, bag houses, etc.,) on-site		✓
Hydraulic lifts		✓
Oil-water separators		✓
Compressors on-site		✓
Grease traps		✓

7.3 Adjoining and Nearby Properties

Contiguous and nearby properties were observed during a walking and vehicular reconnaissance of the subject property boundary and public places. The subject property is located in a rural area of Sunset, St. Landry Parish, Louisiana.

Direction	Description	Relative Gradient	REC
North	Highway 178 followed by residential development.	Cross-gradient	No
East	Highway 182 followed by commercial development	Down-gradient	No
South	Residential development followed by Highway 754	Cross-gradient	No
West	Residential development followed by undeveloped, wooded land and Bayou Bourbeux then residential development.	Up-gradient	No

7.4 Site and Area Reconnaissance Summary

According to our site observations and a review of adjoining and nearby properties, the subject property is plowed up farm land and partially wooded land. The subject property is located in a rural setting with residential development to the north, south, and west and commercial development to the northeast of the subject property. Details pertaining to our on-site and off-site observations are referenced previously. We did not identify RECs associated with the subject property or neighboring properties and businesses during the reconnaissance.

8.0 ADDITIONAL SERVICES

ASTM guidelines identify non-scope issues, which are beyond the scope of this practice. Non-scope issues have the potential to be business environmental risks. Some of these non-scope issues include; asbestos-containing building materials, radon, lead-based paint, lead in drinking water, wetlands and mold.

ECS was not authorized to assess non-scope issues in conjunction with this assessment.

9.0 INTERVIEWS

During the site reconnaissance, Mr. Bill Penick interviewed Mr. Andre Bordelon, the current owner. Mr. Bordelon stated that his family has owned the property for approximately 100 years. He indicated that the subject property has been used for agricultural and for raising cattle. Mr. Bordelon indicated that he is not aware of 1) environmental concerns associated with the subject property; 2) any pending, past, or threatened administrative litigation or administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or 3) any government notices regarding any possible violation of environmental laws or possible liability related to hazardous substances or petroleum products.

Mr. Zach Hager, Director of Business Development with One Acadiana, completed the User Questionnaire on February 11, 2020 and granted site access on March 30, 2020.

10.0 FINDINGS AND CONCLUSIONS

The subject property is identified by the St. Landry Parish Online GIS system as Parcel Identification Numbers (PINs) 0104282500 and 0104282000 and owned by Daly Farms, LLC. The approximately 105-acre subject property is mainly agricultural land and partially wooded land in a rural area of Sunset, St. Landry Parish, Louisiana.

The subject property is located in a rural area of Sunset, Louisiana. The subject property is bound on the north by Highway 178 followed by residential development, on the east by Highway 182 followed by Kappy's Korner Store and agricultural land, on the south by partially, wooded land followed by residential development and mainly grass-covered land, and on the west by undeveloped, wooded land and Bourdeux Bayou followed by residential development. ECS did not identify environmental issues at adjoining or nearby properties that are believed to present a recognized environmental condition (REC) at the subject property.

Based on the records search, site reconnaissance and interviews, it appears that the subject property was mainly grass-covered land with residential development on the northern section from at least 1957 until 1998. From 2004 through 2017, the subject property is mainly grass-covered land in a rural setting. Historical records prior to 1957 were not reasonably ascertainable for the subject property.

Our review of historical information for adjoining or nearby properties identified the area as originally mainly grass-covered land and partially, wooded land that transitioned to commercial and residential development to the north, south, east, and west of the subject property.

A regulatory database search report was provided by Environmental Data Resources (EDR). The database search involves researching a series of Federal, State, Local, and other databases for facilities and properties that are located within specified minimum search distances from the subject property. The report did not identify the subject property on the databases researched. The EDR report identified two off-site properties within the minimum ASTM search distances. Kappy's Korner Store and Jay's Store was listed on the UST database. Based on our review of available public records, the distance in relation to the subject property, and the topographic location, none of the listings are believed to represent a REC for the subject property.

ASTM E1527-13 defines a "data gap" as: "a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information." The historical documents did not go back to 1940, representing a data gap failure. However, due to the historical use and the current use of the subject property, the data gap failure does not render a professional opinion concerning the subject property.

We have performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM E1527-13 of the Daly Farm Site located at Southwest Corner of Highway 182 and Highway 178 in Sunset, St. Landry Parish, Louisiana. Exceptions to, or deletions from, this practice are described in Section 2.6 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property.

10.1 Opinion

It is the opinion of ECS that additional assessment of this site is not warranted at this time.

11.0 REFERENCES

ASTM E1527-13. Standard Practice for Environmental Site Assessment, Phase I Environmental Site Assessment Process.

Environmental Data Resources, Inc. The EDR Radius Map Report with GeoCheck, dated March 25, 2020.

Environmental Data Resources, Inc., The Aerial Photo Decade Package (years 1969, 1974, 1981, 1985, 1990, 2004, 2007, 2010, 2013, and 2017), dated March 25, 2020.

Environmental Data Resources, Inc., Sanborn Map Report (No Coverage), dated March 25, 2020.

Environmental Data Resources, Inc., The Historical Topographic Map Report (years 1957, 1970, 1983, 1998, and 2012) dated March 25, 2020.

Environmental Data Resources, Inc., The City Directory Image Report (years 2000, 2005, 2010, 2014, and 2017), dated March 27, 2020.

Louisiana Department of Environmental Quality-Electronic Document Management System (LDEQ-EDMS).

ECS interviewed the current owner Mr. Andre Bordelon on April 2, 2020. His number is 337-308-3471.

Mr. Zach Hager, Director of Business Development with One Acadiana, completed the User Questionnaire on February 11, 2020 and granted site access on March 30, 2020.