

**GEORGIA STATE CLEARINGHOUSE MEMORANDUM  
EXECUTIVE ORDER 12372 REVIEW PROCESS**

TO: MS. HALEY FLEMING  
ATLANTA REGIONAL COMMISSION  
40 COURTLAND STREET, NE  
ATLANTA, GA 30303

FROM: Barbara Jackson  
Georgia State Clearinghouse

DATE: 6/10/2008

SUBJECT: Executive Order 12372 Review

APPLICANT: The Reserve at Locust Grove, L.P.

PROJECT: Section 538: Construct 72 unit apartment community for elderly on 9.71-acre site  
(located at Tanger Blvd & Locust Grove Griffin Road, Locust Grove, GA)

CFDA NO.: 10.438

STATE ID: GA080610003

**IMPORTANT! REVIEW COMMENTS DUE BY OR BEFORE: 7/1/2008**

A copy of the Standard Federal Application package, Environmental Information, or Direct Federal Development project is enclosed for your review and comment. Your review should focus on the projects compatibility with those state or regional goals, policies, plans, fiscal resources, criteria for Developments of Regional Impact (DRI), environmental impacts, or inconsistencies with federal executive orders, acts and/or rules and regulations with which your agency is concerned. Negative environmental impacts or provision for protection of the environment and possible duplication of the proposed project with programs presently in place should be pointed out.

Any major points of conflict identified by you during the review process immediately should be brought to the attention of the Administrator, Georgia State Clearinghouse. The Administrator will attempt to mediate these concerns prior to completing the review of the project. The Clearinghouse telephone number is (404) 656-3855.

Please have your comments typed (or hand-printed) and dated on the enclosed Form SC3. An additional sheet may be used if additional space is needed. Your comments will be summarized in a single state position or a composite that reflects both the state and regional recommendations and be returned to the applicant/sponsor. They in turn will forward a copy to the federal agency if necessary.

***NOTE: Please do not return this SC-2 form or the full material back to this office. Keep the copy for your files or dispose of if not needed.***

Form SC-2  
May 2007

## **Proposed Project Description Sheet**

### **The Reserve at Locust Grove Locust Grove, GA**

The Reserve at Locust Grove is a proposed 72-unit apartment community for the elderly situated at Tanger Blvd. and Locust Grove Griffin Road in the City of Locust Grove. The community will be situated on a 9.71 acre site directly across the street from the Locust Grove Public Library (115 Locust Grove Griffin Road, Locust Grove, GA 30248). Ingress and egress to the community will be via a paved grand entrance off Locust Grove Griffin Road.

The project site will consist of five two-story residential buildings, one single story residential building and one non-residential single story building. Construction will be brick, cement fiber board and accent materials. The development will consist of 8 one bedroom units and 64 two bedroom units. We have confirmed with local authorities that electric, water and sewer are available to the site.

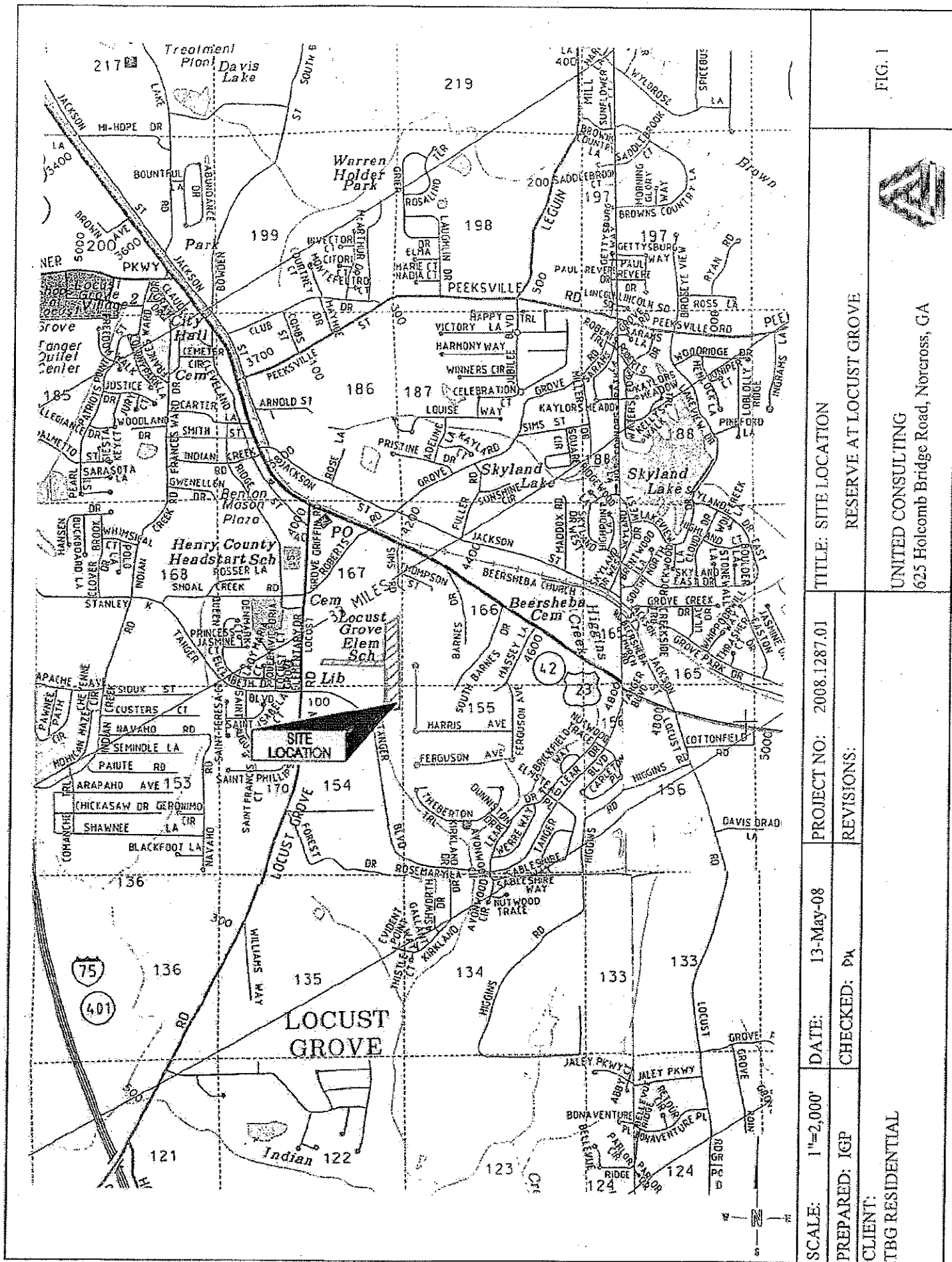


FIG. 1



RESERVE AT LOCUST GROVE

UNITED CONSULTING  
625 Holcomb Bridge Road, Norcross, GA

TITLE: SITE LOCATION

PROJECT NO: 2008.1287.01

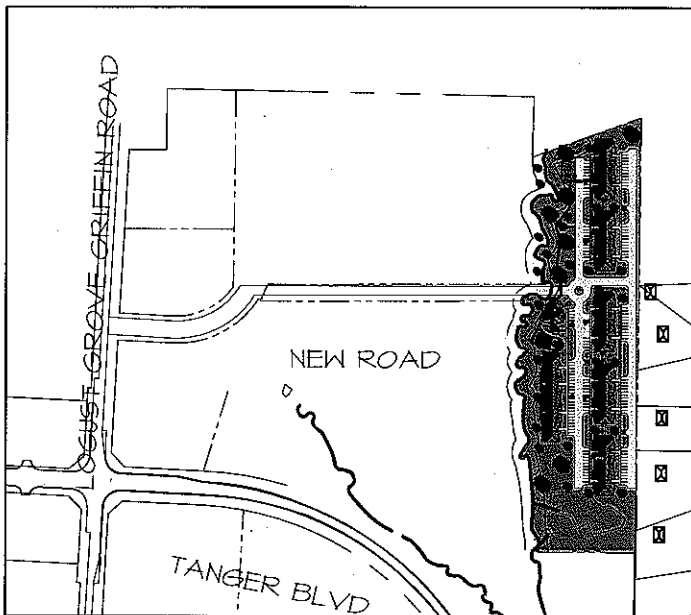
DATE: 13-May-08

SCALE: 1"=2,000'

CHECKED: PK

PREPARED: IGP

CLIENT:  
TBG RESIDENTIAL



#### BLDG. MIX

- BLDG. A - 2-BR 2 STORY
- BLDG. B - 1 & 2-BR 1 STORY
- BLDG. C - COMMUNITY BUILDING

(60) TYPICAL 2-BR APTS.

(1) AUDIO/VISUAL 2-BR APT.

(3) ACCESSIBLE 2-BR APTS.

(6) TYPICAL 1-BR APTS.

(1) AUDIO/VISUAL 1-BR APT.

(1) ACCESSIBLE 1-BR APT.

(72) TOTAL APTS.

#### AMENITIES:

- COMMUNITY BUILDING w/FITNESS CENTER,
- COMPUTER CENTER, & LIBRARY
- GAZEBO
- FENCED GARDEN PLOTS
- COVERED PAVILION w/BBQ
- WALKING PATH w/SITTING AREAS
- COMPLETE FIRE SPRINKLER SYSTEM
- LAUNDRY w/ WASHER & DRYER PER 25 UNITS
- TRASH DUMPSTERS
- RENTAL OFFICE

#### PARKING:

(139) RESIDENT SPACES

(5) GUEST SPACES

(6) ACC. SPACES

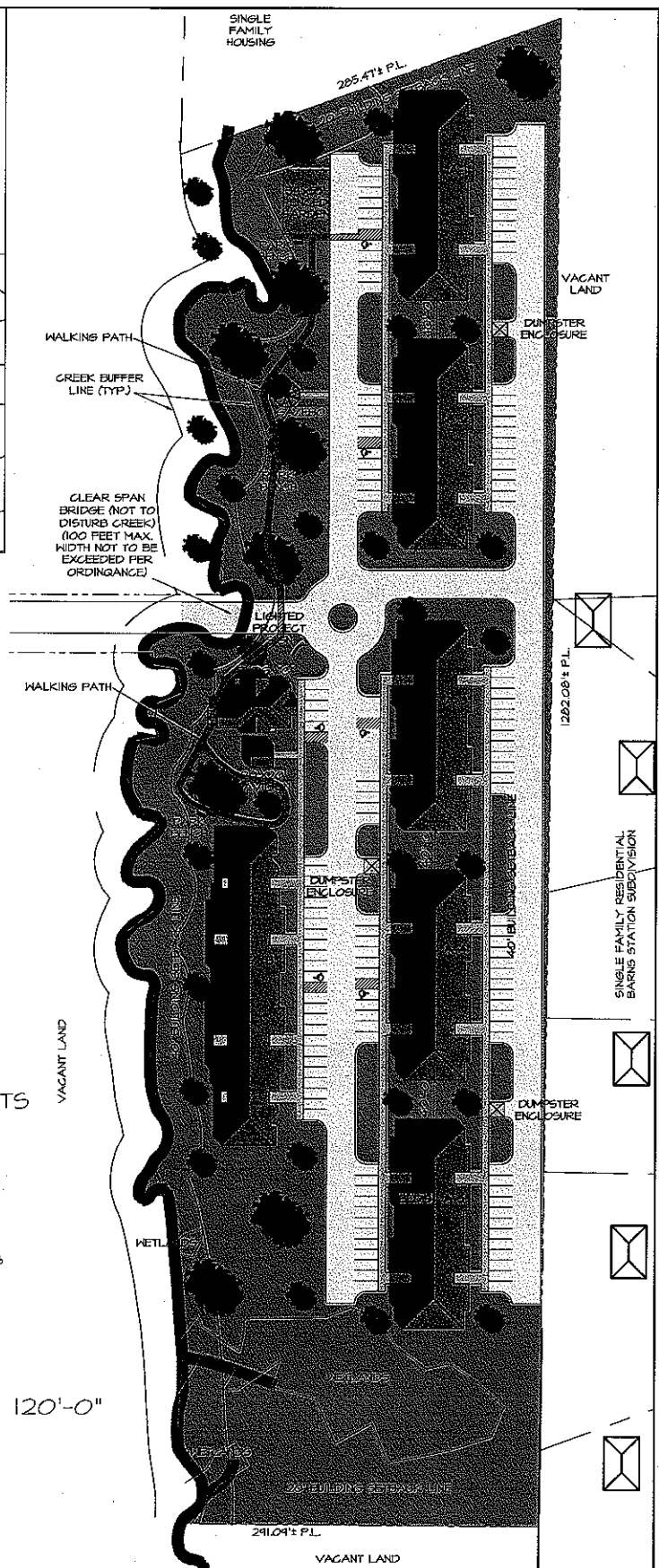
(150) TOTAL SPACES

SITE: 9.70 ACRES ±  
ZONED RM-1

SCALE: 1" = 120'-0"

#### NEIGHBORING PROPERTIES:

- NORTH - SINGLE FAMILY HOUSING
- SOUTH - VACANT LAND
- EAST - SINGLE FAMILY RESIDENTIAL
- WEST - VACANT LAND



## PROPOSED SITE PLAN

## THE RESERVE AT LOCUST GROVE

Locust Grove, Georgia  
June 2008

**Wallace**  
ARCHITECTS L.L.C.  
COPYRIGHT © 2008

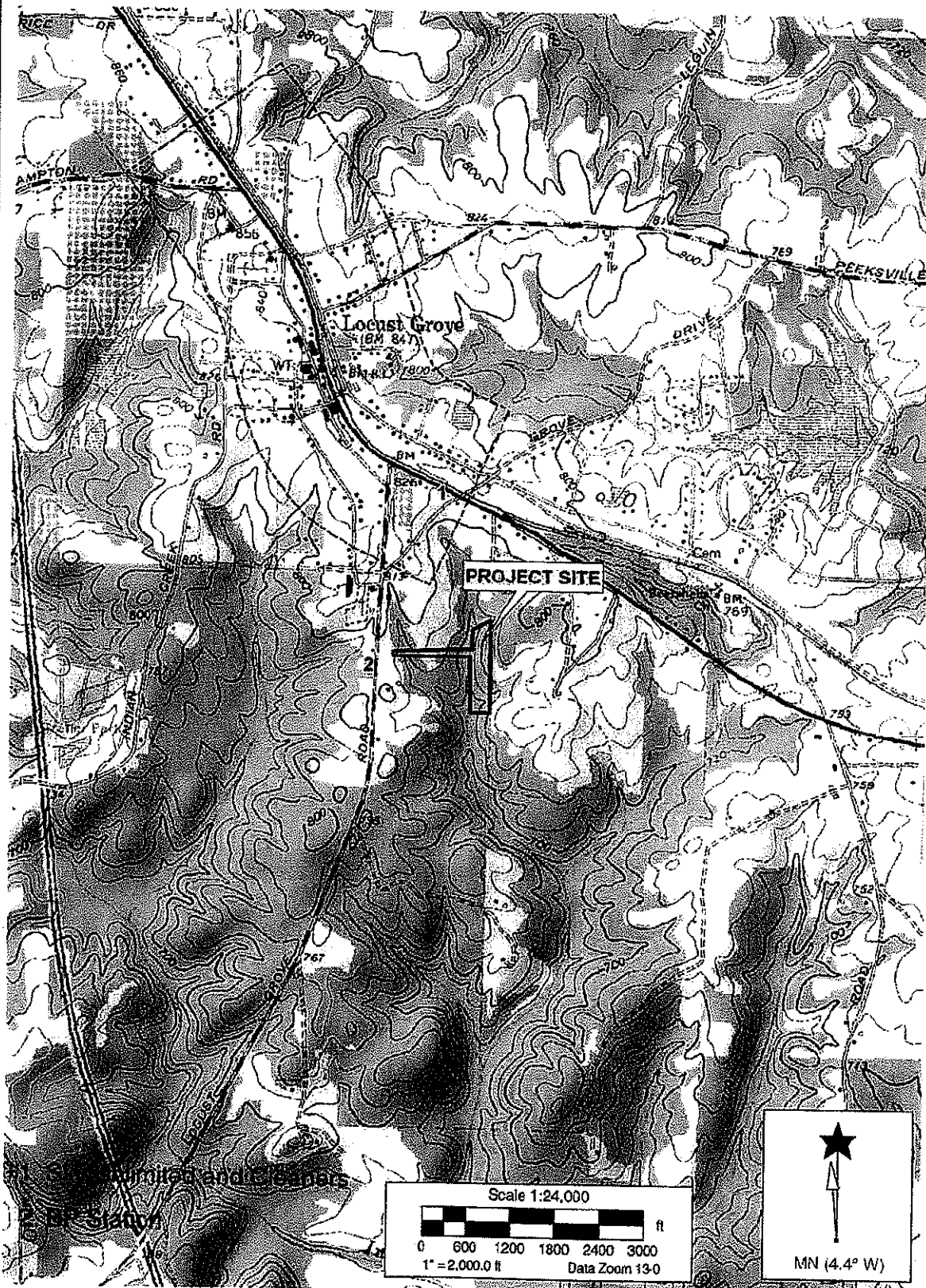


FIG. 3



UNITED CONSULTING  
625 Holcomb Bridge Road, Norcross, GA

TITLE: TOPOGRAPHIC MAP

RESERVE AT LOCUST GROVE

PROJECT NO: 2008.1287.01

REVISIONS:

DATE: 13-May-08

CHECKED: 24

SCALE: 1"=2,000'

PREPARED: IGP

CLIENT:  
TBG RESIDENTIAL



Photograph 1: View of the southern portion of the Project Site.



Photograph 2: View of the central portion of the Project Site.





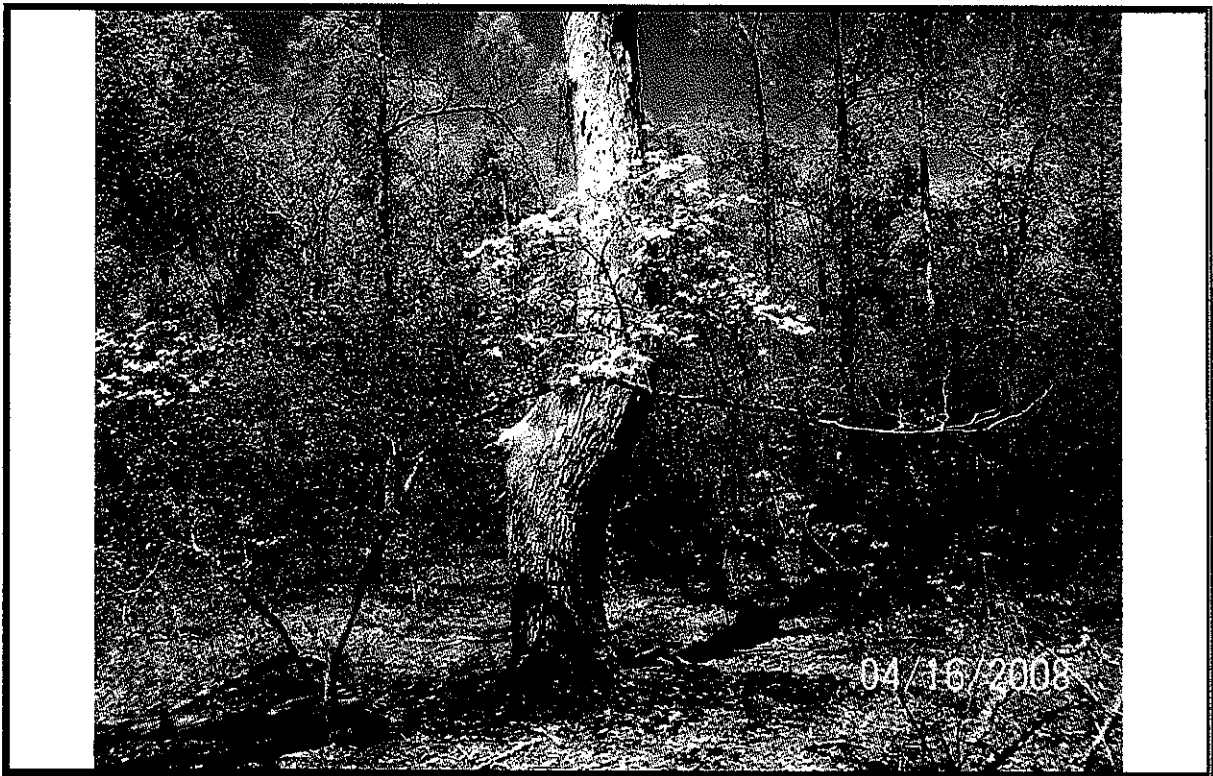
Photograph 3: View of the creek located along the western boundary of the Project Site.



Photograph 4: Looking north from the central portion of the Project Site.



Photograph 5: View of the northern portion of the Project Site.



Photograph 6: View of the eastern portion of the Project Site.





Photograph 7: View of the central eastern central portion of the Project Site.



Photograph 8: Looking east from the Project Site.



*We're here for you*

**UNITED CONSULTING**

May 19, 2008

To: Georgia Department of Community Affairs  
60 Executive Park South, NE  
Atlanta, Georgia 30329-2231

Re: Reserve at Locust Grove, UC project 2008.1287.01


Ladies/Gentlemen:

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 C.F.R. 312.

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 the all appropriate inquiries in conformance with the standards and practices set forth in 40 C.F.R. Part 312.

May 19, 2008


Date

  
Ian G. Pilling  
Environmental Professional

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitation of 40 C.F.R. Part 312 and ASTM E 1527-05 of the Reserve at Locust Grove, the property. Any exceptions to, or deletions from this practice are described in Section 2.2.2 of this report. We certify that the Phase I was performed by a qualified Environmental Professional meeting the requirements set forth in 40 C.F.R. §312.10(b).

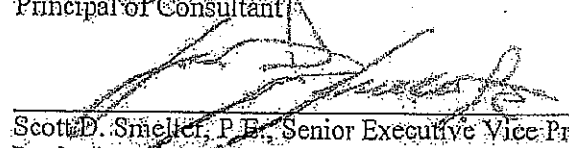
May 19, 2008

Date

  
Scott D. Smelter, P.E., Senior Executive Vice President  
Principal of Consultant

May 19, 2008

Date

  
Scott D. Smelter, P.E., Senior Executive Vice President  
Professional Geologist or Professional Engineer



*We're here for you*

**UNITED CONSULTING**

May 19, 2008

Mr. Brad Smith  
TBG Residential  
3825 Paces Walk SE  
Suite 100  
Atlanta, GA 30339

via email: [bksmith@tbgresidential.com](mailto:bksmith@tbgresidential.com)

RE: Phase I Environmental Assessment  
Reserve at Locust Grove  
Tanger Boulevard  
Locust Grove, Henry County, Georgia  
Project No. 2008.1287.01

Dear Mr. Smith:

United Consulting is pleased to submit this report of our Phase I Environmental Assessment for the above-referenced Project Site. The results of the environmental assessment and our comments pertinent to this project are included in the enclosed report. The Phase I Environmental Assessment was performed in substantial conformance with the standards developed by the American Society for Testing and Materials (ASTM) and with the United States Environmental Protection Agency (EPA), "All Appropriate Inquiry" Rules, dated November 1, 2006 (Rules), annotated per DCA's 2008 Environmental Manual requirements. In addition, this assessment was performed to conform with the Housing and Urban Development (HUD) guidelines referenced in the DCA manual. This report has been prepared for the use of TBG Residential, the Georgia Housing and Finance Authority (GHFA) and the DCA. Any materials referenced or presented herein are, according to United Consulting, believed to be accurate and may be relied upon by the above parties.

We appreciate the opportunity to assist you with this project. Please contact us if you have any questions or if we can be of further assistance.

Sincerely,

**UNITED CONSULTING**

  
Ian G. Pilling  
Senior Environmental Specialist

IGP/DPH/ljr  
H:\geoenv\reports\2008\2008.1287.01.dca

  
David P. Huetter  
Associate Environmental Specialist

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## APPENDICES

### Appendix A Figures and Maps

- Figure 1 Site Location Map
- Figure 2 Site Plan (showing anticipated groundwater flow direction)
- Figure 3 USGS Topographic Map (showing identified facilities)
- Figure 4 Soil Survey Map
- Figure 5 National Wetlands Inventory Map
- Figure 6 FEMA Floodplain Map
- Figure 7 Georgia Map of Radon Zones
- Figure 8 Wetland and Stream Delineation Map

### Appendix B Photographs

### Appendix C Historical Research Documentation (Aerial Photographs and Topographic Maps)

### Appendix D Documentation from Title Company/Title Professional and Legal Description

### Appendix E Phase II Report (Not Applicable)

### Appendix F Regulatory Search Information

### Appendix G Record of Communications and Interviews

### Appendix H Author Credentials, Documentation of Qualification as an "Environmental Professional"

### Appendix I Other Previous Environmental Reports (Not Applicable)

### Appendix J Noise Assessment Report

### Appendix K HOME and HUD Environmental Questionnaire (Not Applicable)

### Appendix L Owners Environmental Questionnaire

### Appendix M Property Log and Information Checklist

### Appendix N Proof of Insurance

### Appendix O Letters of Reference

### Appendix P Environmental Certification

### Appendix Q Water Quality Report (Not Available)

### Appendix R Stream Buffer Statement



UNITED CONSULTING

## 1.0 EXECUTIVE SUMMARY<sup>1</sup>

United Consulting has performed a Phase I Environmental Assessment for the Project Site in substantial conformance with the scope and limitations of ASTM Practice E 1527-05 and the guidelines established by the Georgia Department of Community Affairs (DCA), dated 2008.

### 1.1 Location and Legal Description of the Property

A Phase I Environmental Assessment has been completed on the Reserve at Locust Grove site, (hereinafter referred to as the 'Project Site') located off of Tanger Boulevard in Locust Grove, Henry County, Georgia. The Project Site was approximately 9-acres in size and located in Land Lots 154 and 167 of the 2<sup>nd</sup> District, of Henry County, Georgia. Please refer to the text of the report for a more detailed discussion of the items summarized below. A copy of the legal description of the Project Site has been reproduced in Appendix D.

### 1.2 Environmental Concerns and Conclusions

The results of the site reconnaissance, research, and analysis are provided below:

#### 1.2.1 On-Site

The Project Site consisted of approximately 9-acres of undeveloped wooded land. The Project Site was an irregular shaped parcel located to the northeast of the intersection of Tanger Boulevard and Locust Grove Griffin Road. The Project Site was not listed on the federal or state databases reviewed. Based on our research, historically, the Project Site has been undeveloped wooded land since at least 1939. No visual evidence of Recognized Environmental Conditions (RECs) on the Project Site such as stained soils, stressed vegetation, drums, land filling, or illegal disposal of hazardous substances was identified. Based on the entirety of the Phase I Environmental Site Assessment, no on-site RECs were identified.

#### 1.2.2 Off-Site

Surrounding properties consisted of undeveloped wooded land or were developed with single-family residential structures. Two listed, regulated facilities and one other notable facility were identified within the prescribed search distances from the Project Site. Based on distance, topography, and/or age of the facilities, in United Consulting's opinion, these regulated facilities are not RECs to the Project Site.

### 1.3 Recommendations

#### 1.3.1 On-Site

No visual evidence of Recognized Environmental Conditions at the Project Site such as stained soils, stressed vegetation, drums, land filling, or illegal disposal of hazardous substances was

---

<sup>1</sup> This Executive Summary is not intended to be used or relied upon without reference to the entire report and cannot otherwise be properly understood and interpreted. It is provided solely for the convenience of the Client and not as a substitute for the report or review of the report.



identified during our reconnaissance. No further investigation or action is recommended to determine the presence of RECs originating on the Project Site.

#### Noise Assessment:

Noise sources that were identified near the Project Site included the Norfolk Southern rail line located approximately 1,400 feet north of the Project Site. Based on the three Noise Assessment Location (NAL) points, the calculated noise levels at the Project Site ranged from 62 to 65 decibels (dB), which are within the acceptable range. The noise assessment report has been included in Appendix J.

#### Wetland and Stream Assessment:

Wetlands were identified near the southern boundary of the Project Site. Based on the provided site design plan, it appears that the proposed building/street layout will not impact the wetlands.

A perennial stream forms the western boundary of the Project Site. This stream was observed to be confined to a four to eight foot wide channel. A second, small intermittent stream channel was observed near the northern boundary of the Project Site. This small feature appeared to originate near the base of the dam of the adjacent pond. Based on the proposed site layout, the entry drive will cross the perennial stream, but will bridge over the stream to avoid impact.

#### 1.3.2 Off-Site

Based on this assessment and research, in United Consulting's opinion, the identified off-site regulated facilities do not represent RECs to the Project Site at this time.

## 2.0 INTRODUCTION

### 2.1 Background

United Consulting was retained by TBG Residential to perform a Phase I Environmental Assessment of the Project Site. This assessment was conducted with the understanding that the client is applying for low income housing tax credits associated with proposed plans to develop the Project Site. The purpose of this assessment was to determine whether the property is environmentally suitable for multifamily housing, and whether there is evidence of Recognized Environmental Conditions (RECs) on or adjacent to the Project Site, which could impose an environmental liability on the Project Site. The purpose of this assessment was therefore to satisfy one of the requirements to qualify for the *bona fide prospective purchaser* limitations on CERCLA liability, innocent landowner protection, and the contiguous property owner protection.

The intent was to identify conditions indicative of releases and threatened releases of hazardous substances on, at, in, or to the property, and to conduct all appropriate inquiry into the previous ownership and uses of the property. A standard approach was used, which substantially followed the methodology developed by ASTM Practice E 1527-05 and the DCA 2008 Environmental Manual requirements. The ASTM approach constitutes a limited, but commercially prudent and



reasonable, inquiry. This assessment was performed to identify environmental concerns that may be discerned by visual observation and information-gathering procedures.

## 2.2 Procedures

The general procedures, scope of services, deviations, United Consulting's qualifications, and the limitations are included in the following sections:

- Reconnaissance of the Project Site and surrounding area, with a focus on environmental issues;
- Research of readily available Federal and State environmental agency records for evidence of hazardous substances or related activities on or near the Project Site;
- Review of historic maps and aerial photographs to assess area history and past use of the Project Site;
- Review of the Henry County title records for evidence of hazardous waste liens, industrial use, or other environmental concerns pertaining to the Project Site if provided by the client;
- Interviews with residents near the Project Site to assess past and present activities which may have impacted the Project Site;
- Interviews with five government agencies (as required by the DCA), including local fire and health officials as possible;
- Conducted a wetlands investigation, which included review of NWI maps, FEMA floodplain maps, field visit, and delineation of identified features;
- Completion of the DCA Environmental Review Documentation Information checklist and review of the Owner Environmental Questionnaire and Disclosure Statement, and
- Preparation of this report to document the results of the site reconnaissance, historical and regulatory research and interviews, and to provide United Consulting's professional opinion of the environmental condition of the Project Site.

The Phase I Environmental Assessment was performed to substantially meet the requirements of ASTM for such investigations. The technical requirements of the ASTM standard, revised in the year 2005, were followed. Deviations made from the ASTM standard include use of the DCA-mandated format and review of certain non-scope issues.



### 2.3 Significant Assumptions

This Assessment was based on the following significant assumptions in the preparation of this report:

- Site Use - This assessment was conducted for a DCA tax credit application.
- Groundwater Flow Direction - The direction of groundwater flow in the area of the property has been inferred based on the site observations of topographic slope, proximity of nearby water bodies, and review of the current USGS topographic map.
- Regulatory Records Information - This assessment is based on information provided by EDR regarding the regulatory status of facilities within the minimum search distances, and that this data is complete, accurate, and current.
- Data Gaps - Only the identified significant data gaps affect the assessment.
- Other - This assessment is also based on all information provided through interviews of pertinent agencies, occupants, users, and persons familiar with the property being complete and unbiased.

These limitations are referred to in the ASTM Standard as assumptions. They form part of the basis for the assessment performed for this Project Site. If any of these items are not accurate, United Consulting must be so informed so appropriate re-assessment can be performed.

### 2.4 Qualifications of Personnel

United Consulting has been providing engineering and environmental service for over 15 years. The Principals started performing Phase I Environmental Assessments in 1986 and have adapted the ASTM standards as they were developed and modified. The Environmental Professional (EP) performing the reconnaissance has more than five years of environmental experience and the supervising EP has more than ten years of relevant environmental experience. The company has performed thousands of these assessments, and over 300 in the last twelve months. A few letters of reference as well as resumes for the persons performing this assessment are attached in Appendix H and Appendix O of this report, respectively.

### 2.5 Assessment of Specialized Knowledge or Experience of User and/or "Environmental Professional"

United Consulting provided the client with the User Questionnaire, which included the statement "Does the user possess any actual or specialized knowledge or experience that is material to any potential RECs in connection with the Property?" Mr. Jeffery Carrsher, one of the property owners, stated that he was not aware of any specialized knowledge in connection with the Project Site.



During completion of this Phase I Environmental Assessment, the EP conducted a reconnaissance of the Project Site, a visual review of the adjoining properties, reviewed the regulatory database report, and reviewed the results of the interviews from these sources, the EP had no specialized knowledge of the Project Site or surrounding properties.

## 2.6 Limitations and Exceptions

United Consulting has performed appropriate inquiry for this Phase I Environmental Site Assessment in substantial conformance with the scope and limitations of ASTM Practice E 1527-05 and according to the DCA guidelines. The Phase I Environmental Site Assessment was also written for the benefit of DCA and GHFA, which may rely on this report in deciding whether to make the requested loan and/or allocations of tax credits on the property involved.

No environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a site. United Consulting's assessment is based on a visual evaluation of the surficial conditions only. No other warranty or guarantee is expressed or implied. This report must be considered in its entirety.

This report is for the exclusive use of TBG Residential, Georgia DCA, and the GHFA, and may be used only in reference to the project or site described herein. United Consulting is not affiliated with the owner/developer or a buyer or seller of the Project Site. United Consulting's conclusions, opinions and suggestions have been prepared using generally accepted standards prevailing within the relevant disciplines as practiced within the southeastern United States. United Consulting's conclusions, opinions and suggestions have been prepared using generally accepted standards prevailing within the relevant disciplines as practiced within the southeastern United States. Nothing contained within this report is intended to supersede or replace the judgment of the Client. All decisions relating to the aforementioned project or site are the sole responsibility of said user(s).

The right to rely upon this report and the data herein may not be assigned without the express written permission of United Consulting. As a prerequisite for the granting of such permission, the third-party users (including, but not limited to, the Client's successors and assigns) must agree to be bound by the terms and conditions of the original agreement between United Consulting and the Client. Further, reliance is dependent on similar uses of the property and the document.

United Consulting's conclusions, opinions and suggestions are based upon information furnished including governmental records, as well as United Consulting's professional experience. This assessment may not detect or account for all conditions or factors present at a project area or Project Site. Should such unexpected conditions or factors become manifest during subsequent activities at a site, it will be necessary for United Consulting to review and re-evaluate any and all conclusions, opinions and suggestions made with respect to this project or Project Site. Accordingly, United Consulting should be contacted immediately in such a situation.





In the event that there are any subsequent changes or additions to the project or Project Site information provided to United Consulting in connection with the preparation of this report, the contents of this report must be considered invalid unless such changes or additions are reviewed by United Consulting and the associated conclusions, opinions and suggestions are either verified or modified in writing. United Consulting should also be consulted concerning any future work to be performed in connection with the project or site so that we can determine whether such work is consistent with our conclusions, opinions and suggestions.

## **2.7 Special or Additional Conditions or Contract Terms**

The terms and conditions for this Phase I Environmental Assessment were set forth in United Consulting's April 8, 2008 proposal, which was executed by the client on April 9, 2008. A significant condition of this agreement was that the (client) would be responsible for providing United Consulting with a boundary survey, chain-of-title search records, search of environmental liens and activity and use limitations. At the time of issuance of this report, the client did not have the title and lien search information completed; therefore, the client provided separate authorization for United Consulting's title professional to conduct this research.

## **3.0 SITE SETTING**

### **3.1 General Description of the Site and Vicinity**

The Project Site is located in Land Lots 154 and 167 of the 2<sup>nd</sup> District, of Henry County, Locust Grove, Georgia. The Project Site consisted of approximately 9-acres, located northeast of the intersection of Tanger Boulevard and Locust Grove Griffin Road. The client initially provided United Consulting with an undated and not to scale topographic map and sketch of the Project Site, which was used as a guide to locate the boundaries of the Project Site during the site reconnaissance. The client also provided a boundary survey prepared by Falcon Design Consultants, L.L.C., dated May 5, 2008 after the site reconnaissance was completed. The general location of the Project Site is shown on Figure 1. The site plan is provided as Figure 2, which includes the anticipated groundwater flow direction.

#### **3.1.1 Current Site Use and Description**

A site reconnaissance was conducted on April 16, 2008. The Project Site contained approximately 9-acres of undeveloped wooded land. The Project Site was observed to be vegetated with a mix of mature and small hardwood trees and small deciduous shrubs and scrub cover.

#### **3.1.2 Current Uses of Adjoining Properties**

Properties surrounding the Project Site consisted of undeveloped wooded land and single-family residential homes to the north and east.



### 3.1.3 Description of Structures, Roads, and Other Improvements

The Project Site can be accessed via Tanger Boulevard. The Project Site is currently undeveloped wooded land. No roads, structures, or other improvements were observed on the Project Site.

## 3.2 Hydrogeology

The topography, geology and hydrogeology commonly control the migration of chemicals released at a site/facility. The relative location of the properties will often define their potential interaction and hydraulic connection. The description of the physical setting for the Project Site is provided below, starting with the topography and geology. The estimated surface water and groundwater flow directions are then estimated and described.

### 3.2.1 Geologic Setting

The Project Site is located in the Piedmont Physiographic Province of Georgia, which is characterized by medium- to high-grade metamorphic rocks and scattered igneous intrusions. Topography in the province is variable and ranges from gently rolling hills in the south to moderate to steep hills in the north. Based on the United States Geological Survey (USGS) 7.5-minute topographic quadrangle map of the area, *Locust Grove, Georgia*, 1964, elevations in the vicinity of the Project Site range from approximately 700 feet above mean sea level (ft amsl) to approximately 800 ft amsl.

The metamorphic rocks comprising the Piedmont were formed when older "parent" rocks were subjected to high temperatures and/or pressures during regional metamorphism that occurred during the creation of the Appalachian Mountains. The same high temperatures and pressures also caused some "parent" rocks to fully melt and subsequently re-crystallize as intrusive igneous rocks. According to the *Geologic Map of Georgia*, the rock types underlying the Project Site have been mapped as biotite gneiss, mica schist, and amphibolites, which are highly metamorphosed rocks.

### 3.2.2 Surface Drainage/Surface Waters

The Project Site was located in an area of rolling hills with elevations ranging from approximately 740 ft amsl to approximately 770 ft amsl. Topography at the Project Site generally slopes down to the west. Surface water flow at the Project Site and immediate vicinity is estimated to generally flow to the west on the eastern portion of the Project site and east on the western portion of the Project Site towards a tributary of Indian Creek that is located along the western boundary of the majority of the Project Site. Figure 2 shows the topography of the Project Site and surrounding areas.

### 3.2.3 Groundwater

Groundwater in this region is contained in joints, fractures and other openings in bedrock and the pore spaces in the overlying residual soil. Groundwater recharge occurs by seepage of water through the soil and/or rock or by flowing directly into openings in outcropping rock. The primary source of recharge water is from precipitation that falls in the area, but can also originate from river discharge during dry periods. The movement of groundwater typically follows the



original surface topography, moving from hilltops and uplands to stream valleys. The water table is generally 30 to 100 feet below the ground surface on hilltops and hillsides, but is at or near the ground surface in stream valleys and draws. In this type of geologic setting, the direction of groundwater flow can be anticipated to generally conform to that of the surface water.

Based on the USGS topographic map of the area, groundwater below the Project Site is anticipated to flow generally to the west on the eastern portion of the Project Site and east on the western portion of the Project Site towards a tributary of Indian Creek. Areas considered up-gradient of the Project Site are to the north and east of the Project Site within approximately 2,000 feet. This anticipated direction of groundwater flow was used to assist in the evaluation of potential impacts from nearby properties. The anticipated direction of groundwater flow is shown on Figure 2.

### 3.3 Wetlands

United Consulting performed a wetland investigation to identify wetlands and other jurisdictional waters of the United States (U.S.) on the Project Site. The areas of the Project Site were evaluated in accordance with the guidelines outlined in the U.S. Army Corps of Engineers (USACE) 1987 Wetland Delineation Manual.

For an area to be classified as a wetland, the area must exhibit characteristics that satisfy criteria within the following three parameters: a dominance of wetland vegetation; physical evidence of wetland hydrology; and indications of hydric soils. Hydric soil characteristics occur in soils that are saturated or flooded long enough during the growing season to develop anaerobic (low oxygen) conditions that support wetland (or hydrophytic) vegetation. Other jurisdictional waters of the U.S. include areas such as lakes, ponds, rivers, and streams.

Background research was conducted to determine the potential for wetlands and other jurisdictional waters of the U.S. on the Project Site. This research included review of the Henry County Soil Survey, United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) map, and the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map of Henry County, Georgia and Incorporated Areas. Additionally, an on-site investigation was conducted for visual evidence of wetlands and other jurisdictional waters on the Project Site.

The Soil Survey of Henry County indicated the soils mapped on the Project Site were Cartecay soils, Cecil sandy clay loam, and Pacolet sandy loam. The Cartecay soils are listed on the national hydric soils lists. A copy of the Soil Survey map of the area is included as Figure 4 of this report.

Review of the USFWS NWI map of the area did not indicate previously mapped wetlands or other aquatic systems on the Project Site. A copy of the NWI map of the area is included as Figure 5 of this report.



United Consulting conducted a full Stream and Wetland Delineation of the property to verify the presence and location of jurisdictional waters, including wetlands, on the Project Site. The field delineation included GPS Mapping of the identified areas to confirm the location in relation to the property boundaries and proposed development.

A perennial stream forms the western boundary of the Project Site. The perennial stream was observed to contain a sandy substrate with some localized areas of cobble. The stream appeared to be contained within a four to eight foot wide channel. A second, small intermittent stream originating from the base of a small dam located just to the north of the Project Site was also identified on the Project Site. This small stream was confined to a channel which ranged between three and five feet in width.

Three areas of wetlands were identified in the field. Two of the wetlands identified in the field were confined in eroded gullies seeping into the perennial stream feature. The third wetland area covers a footprint that stretches between the western and eastern boundaries. Please refer to Figure 8 of this report, which shows the location of the property boundaries and the identified streams and wetlands.

### **3.4 Floodplain/Floodway**

The FEMA Flood Insurance Rate Map (Community Panel No. 13151C0278C) indicated the Project Site is located outside the mapped limits of the 100-year floodplain. A copy of the FEMA floodplain map of the area is included as Figure 6 of this report.

### **3.5 State Waters**

United Consulting's investigation of the Project Site was also conducted to identify areas that would meet the definition for state waters, as defined in the Official Code of Georgia Annotated (OCGA), Volume 10, 12-7-3: Definitions, (13) "State waters" and interpreted by the Georgia Environmental Protection Division (EPD). According to the 2005 changes in the EPD rules concerning state waters and buffers, a stream feature must contain 'normal stream flow' (which has been interpreted to mean 'base flow') in order to be subject to the buffer requirements. Based on the field conditions at the time of the field reconnaissance, and map review, state waters were observed on the Project Site.

A perennial stream feature was observed forming the western boundary of the Project Site and flowed in a north to south direction. This stream varied in width between 4 to 8 feet in width. A second smaller tributary of this stream was observed near the northern property boundary. This smaller stream appeared to be intermittent and picked up flow near the base on an adjacent dam.

**In our opinion, the streams on the Project Site would be considered state waters requiring a buffer.** The streams are subject to the appropriate state and city buffers. Consultation with the City of Locust Grove found that the Project Site would be subject to a 25 foot undisturbed buffer. A copy of this an e-mail from the City of Locust Gove summarizing the ordinance is located in Appendix R of the report.



### 3.6 Endangered Species

United Consulting reviewed the list of federal and state protected species for U.S. Fish and Wildlife Service from the Georgia Department of Natural Resources (DNR) website list of endangered species for the Locust Grove USGS 7.5-minute topographic quadrangle map. Our review of the data did not identify federally protected species within the topographic quarter-quadrangle that includes the Project Site. Further, based on our on-site investigation and the current conditions of the site, no threatened or endangered species have been identified on the Project Site. It is not anticipated that the proposed development would impact species protected under the Endangered Species Act.

## **4.0 REGULATORY INFORMATION**

### 4.1 Data Review

Reasonably ascertainable Federal and State environmental agency records were reviewed for evidence of regulated or investigated facilities within the minimum search distances outlined by ASTM E 1527-05 and 40 C.F.R. Part 312. The search distances are for the Project Site, adjoining properties, property within 0.5 mile, or property within 1.0 mile.

#### **4.1.1 Standard Environmental Record Sources**

United Consulting utilized a commercial database reporting company (Environmental Data Resources, Inc., or EDR) to provide Federal, State, and Tribal environmental records. The search was conducted by selecting a center point within the interior of the Project Site and then expanding the search distances (in ¼-mile increments) as necessary based on the distance from the center point to the furthest Project Site boundary. Therefore, some facilities may appear within the database report that are actually beyond the required search distances. United Consulting field located the listed facilities and only those facilities confirmed to be within the respective ASTM or AAI search distances are referenced in this report. A copy of the database report used for the regulatory agency review is included in Appendix F. The facilities identified and search records reviewed are listed in Table 1.

**TABLE 1: REGULATORY DATABASES**

DATABASE	DATE UPDATED	NUMBER AT PROJECT SITE	NUMBER WITHIN SEARCH RADIUS
SEARCH DISTANCE: 1-MILE			
United States Environmental Protection Agency (US EPA) National Priority List (NPL)	January 2008	0	0
US EPA CORRACTS database	December 2007	0	0
Georgia Environmental Protection Division (EPD) Hazardous Site Inventory (HSI), also referred to as the State Priority List (SPL) or State Hazardous	July 2007	0	0



DATABASE	DATE UPDATED	NUMBER AT PROJECT SITE	NUMBER WITHIN SEARCH RADIUS
Waste Sites (SHWS)			
State equivalent CERCLIS database (SCL), also referred to as Non-HSI	January 2008	0	0
SEARCH DISTANCE: ½ MILE			
US EPA Resource Conservation and Recovery Act - Treatment, Storage and Disposal (RCRA TSD) Facilities List	September 2007	0	0
US EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database	January 2008	0	0
US EPA CERCLIS, No Further Remedial Action Planned (NFRAP) database	December 2007	0	0
Georgia Leaking UST List (LUST)	January 2008	0	0
Georgia EPD Operating Solid Waste Facilities List (SWFL)	January 2008	0	0
DRYCLEANERS	November 2007	0	0
Delisted National Priority List (Delisted NPL)	October 2007	0	0
SEARCH DISTANCE ¼ MILE			
US EPA Toxic Release Inventory database (TRIS)	April 2007	0	0
US EPA Facility Index System (FINDS)	January 2008	0	1
SEARCH DISTANCE: PROPERTY AND ADJACENT PROPERTY			
US EPA RCRA Program Generators database (GNRTR) August 2001	September 2007	0	0
Georgia EPD Registered Underground Storage Tanks (UST) List	November 2006	0	2
US DOT Hazardous Materials Information Reporting System (HMIRS)	December 2007	0	0
US EPA Emergency Response Network System (ERNS)	January 2007	0	0
Georgia Spills list	December 2007	0	0
Federally Institutional Control/Engineering Control Registries	August 2007/ August 2007	0	0
State and Tribal Institutional Control Registries	November 2006	0	0
NON-ASTM			
DOD, Department of Defense	November 2006	0	0
NOTES: The database information was obtained from Environmental Data Resources (EDR). This data was relied upon for this Assessment. EDR updates their system information routinely. Their databases are derived from databases developed by various government agencies. United Consulting cannot warrant the accuracy of the information included in these databases.			

#### 4.1.1.1 Facilities Listed in Section 8.2.1 of ASTM E 1527-05 and in Exhibit B1

The Project Site was not listed as a regulated facility on the Federal and State databases reviewed. Based on review of the regulatory database report, two listed, regulated facilities were identified within the various search distances from the Project Site. Based on topography and distance, in United Consulting's opinion, the two listed regulated facilities are not considered to be RECs to the Project Site. Table 2 lists each of the facilities identified and the facilities





relative location to the Project Site, along with the likely potential for impacting the Project Site. A discussion of the regulated facilities, including reviews of regulatory files, is provided in Section 4.1.1.1 and 4.1.1.2. The locations of the identified facilities are shown on Figure 3.

**TABLE 2: SUMMARY OF IDENTIFIED FACILITIES**

No.	Facility & Address	Program	Proximity & Direction	Apparent Hydraulic Relation	Potential Impact Y/N
1	Sky Unlimited Inc. 4126 Highway 42	UST, FINDS	2,100 feet north	Side Gradient	N
2	BP 2800 Tanger Boulevard	UST	1,200 feet east	Side Gradient	N

**1. Sky Unlimited Inc.**

4126 Highway 42  
Registered UST  
(2,100 feet north)

Based the topography and distance from the Project Site, in United Consulting's opinion, this facility is not considered a RECs with respect to the Project Site.

**2. BP**

2800 Tanger Boulevard  
Registered UST  
(700 feet east)

Based on the age of the facility along with the topography and distance from the Project Site, in United Consulting's opinion, this facility is not considered a RECs with respect to the Project Site.

**4.1.1.2 Orphan/Unmapped Facilities**

The regulatory database report includes a list (Orphan List) of facilities that could not be mapped due to poor or incomplete address information. United Consulting reviewed this list, which included 12 orphan facilities, to determine if the Orphan Facilities were located within the respective search distances from the Project Site. Based on United Consulting's map review and field reconnaissance, the listed orphan facilities do not appear to be located within the ASTM or AAI radii from the Project Site. The orphan facilities appeared to be outside the ASTM radii, and in United Consulting's opinion, do not appear to represent RECs to the Project Site.

Other notable (unmapped) facilities may include those businesses, properties or facilities that were not listed as regulated facilities, but were observed by United Consulting during the reconnaissance and appear to represent potential RECs. United Consulting identified one 'other notable' facility during the area reconnaissance and historic data review. The identified facility,



The Cleaners, is located adjacent to Sky Unlimited, Inc. (Registered UST facility) and was observed to be an operational drycleaners. An interview conducted with an employee at the facility stated that the business had been in operation for five years and that they had installed the dry cleaning equipment when they occupied the space. Additionally, the employee stated that the building previously housed a drop off cleaners and that no on site cleaning was done on site. The Cleaners is located in an area that is side gradient from the Project Site; therefore, it is United Consulting's opinion, that this facility does not represent a REC to the Project Site at this time.

#### **4.1.2 Additional Environmental Record Sources**

Local County and City Agencies were contacted to try and obtain the requested Additional Environmental Record Sources. The following information was utilized to enhance and supplement the standard environmental record sources. A reasonable attempt was made to obtain the additional environmental records. A brief description including date of contact, contact information, and/or database is found below.

##### **4.1.2.1 Local Brownfield List**

At the time that the research was conducted for this report, no local Brownfield lists existed. On April 24, 2008, the Georgia Environmental Protections Division Website (<http://www.gaepd.org/>) was searched, which included a list of Brownfields sites, list dated January 30, 2008. No information regarding Brownfields review or listing associated with the Project Site was found.

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

On April 25, 2008, United Consulting reviewed the document pertaining to old/current landfills "entitled 1968 Functional System Map of Henry County, Georgia" reported by the EPD Land Protection Branch. No information regarding local lists of landfills/solid waste disposal sites on the Project Site or adjacent properties were observed. In addition, United Consulting searched the EDR Regulatory Search Report for information regarding landfills/solid waste disposal sites. No landfills or solid waste disposal sites were reported on the Project Site, or surrounding properties.

##### **4.1.2.3 Local Lists of Hazardous Waste/Contaminated Sites**

On April 25, 2008, United Consulting contacted the EPD Corrective Action Program. The representative interviewed indicated that no information exists for the Project Site. No local list of hazardous waste sites is maintained by the City of Locust Grove or Henry County.

##### **4.1.2.4 Local Lists of Registered Storage Tanks**

On April 25, 2008, United Consulting contacted the Henry County Fire Department. A representative with Chief Joe Kelly's office stated that they did not maintain records of properties where there was no specific address. However, we sent a fax request for information to the Fire Department on April 25, 2008. At the time of the issuance of this report no response had been received from the Henry County Fire Department.



#### **4.1.2.5 Local Land Records (for activity and use limitations)**

On April 25, 2008, United Consulting contacted Henry County Code Enforcement. Ms. Pam Taylor stated that they did not have any records of restrictions on the property or records of responses to the property. She stated that for AUL information we needed to contact Henry County Planning and Zoning (HCPZ). HCPZ referred us to Locust Grove Planning and Zoning. Mr. Tim Young with Locust Grove Planning and Zoning stated that the Project Site was zoned RM for apartments/multifamily. He did not have any record of Activity use Limitation on the Project Site.

#### **4.1.2.6 Records of Emergency Release Reports**

On April 25, 2008, United Consulting contacted the EPD Corrective Action Program. Ms. Barbara Terry with the Corrective Actions Program stated that there was no way to search for information regarding an undeveloped property with no address. However, she did perform a search for Henry County Locust Grove and did not return any pertinent results. She stated that it was highly unlikely that they would have records of an undeveloped property.

#### **4.1.2.7 Records of Contaminated Public Wells**

On April 25, 2008, United Consulting contacted the EPD Corrective Action Program. Ms. Barbara Terry with the Corrective Actions Program stated that there was no way to search for information regarding an undeveloped property with no address. However, she did perform a search for Henry County Locust Grove and did not return any pertinent results. She stated that it was highly unlikely that they would have records of an undeveloped property.

#### **4.1.2.8 Planning Department Records**

On April 25, 2008, United Consulting contacted Mr. Tim Young with Locust Grove Planning and Zoning. Mr. Young stated that the Project Site was zoned RM for apartments/multifamily. He did not have any other records pertaining to the Project Site.

#### **4.1.2.9 Local/Regional Pollution Control Agency Records**

On April 25, 2008, United Consulting contacted the EPD Corrective Action Program. Ms. Barbara Terry with the Corrective Actions Program stated that there was no way to search for information regarding an undeveloped property with no address. However, she did perform a search for Henry County Locust Grove and did not return any pertinent results. She stated that it was highly unlikely that they would have records of an undeveloped property. In previous interviews with the EPD, Mr. Jimmy Johnston with the Air Quality Division stated that the State Implementation Plans (SIPs) were under development. However, the finalized plans would not include restrictions on residential developments.



#### **4.1.2.10 Local/Regional Water Quality Agency Records**

Based on interviews conducted with City of Locust Grove employees, the City of Locust Grove does provide water and sewer to the Project Site. Several attempts were made to obtain a water quality report from the City of Locust Grove to no avail. According to a representative with the City of Locust Grove, Mr. David Ellis is in charge of the Water Department but was on vacation and there were no one else who knew if a water quality report was available. A message was left with Mr. David Ellis; however, at the time of the issuance of this report a response had not been received. If Mr. David Ellis is able to provide a water quality report it will be provided in the future.

#### **4.1.2.11 Local Electric Utility Company**

United Consulting made several attempts to contact someone with the local utility company. As of the issuance of this report, we have been unsuccessful in reaching anyone.

### **4.2 Agency Contacts/Records**

Interviews were conducted with state and local government officials who may have been familiar with the Project Site. These persons were questioned as to their knowledge of any past activities at the Project Site that might present the potential for environmental impacts. Documentation of the interviews is included as Appendix G. The interviews provided the following information:

#### **4.2.1 Local Fire Department Official**

On April 25, 2008, United Consulting contacted the Henry County Fire Department. A representative with Chief Joe Kelly's office stated that they did not maintain records of properties where there was no specific address. However, we sent a fax request for information to the Fire Department on April 25, 2008. At the time of the issuance of this report no response had been received from the Henry County Fire Department.

#### **4.2.2 State, Local or Regional Health or Environmental Agency**

United Consulting contacted the Henry County Environmental Health Department on April 25, 2008. Ms. Tammy Coles with the Henry County Environmental Health Department stated that they would not have any records of responses or other activities involving the Project Site since it was an undeveloped property with no address.

#### **4.2.3 Local Building Permit Agency Official**

On April 25, 2008, United Consulting contacted the Locust Grove Building Department Planning. Mr. Tim Young with Locust Grove Building Department Planning and also the Locust Grove Planning and Zoning stated that the Project Site was zoned RM for apartments/multifamily. He did not have any record of previous permits associated with the Project Site.



#### **4.2.4 Local Groundwater Use Permit Agency Official**

United Consulting contacted the City of Locust Grove on April 25, 2008 concerning local groundwater use permits. The City does not maintain records of groundwater use permits.

#### **4.3 Interviews**

During and following the site reconnaissance, interviews were conducted with persons familiar with the Project Site. These persons were questioned as to their knowledge of any past activities at the Project Site that might present the potential for environmental impacts. Documentation of the interviews is included as Appendix G. The interviews provided the following information:

##### **4.3.1 Current Key Site Manager, Occupants, or Owners of the Property**

United Consulting reviewed the owner environmental questionnaire and disclosure statement completed by Mr. Jeffery Carrsher, one of the property owners. Mr. Carrsher did not indicate that he was aware of any environmental concerns or RECs associated with the Project Site.

##### **4.3.2 Current Owners or Occupants of Neighboring Properties**

United Consulting interviewed an employee, who chose not to provide her name, of "The Cleaners" located at 4128 Highway 42 in Locust Grove, on April 16, 2008. The employee stated that the business had been in operation for five years and that they had installed the dry cleaning equipment when they occupied the space. Additionally, the employee stated that the building previously housed a drop off cleaners and that no on site cleaning was done on site.

##### **4.3.3 Past Owners, Occupants or Operators of the Property**

Past occupants/owners of the Project Site were not readily available for interview.

##### **4.3.4 User(s)**

United Consulting considered the purchaser, developer, and/or entities applying for DCA tax credits (applicant) as users of the report. Therefore, United Consulting provided TBG Residential (developer) with a User Questionnaire. The following summarizes the results obtained from the User Questionnaire. The User Questionnaire can be found in Appendix G.

##### **4.3.4.1 Title Records**

The client did not provide title records for the Project Site. Therefore, United Consulting's title professional Mr. Vincé Valvo, reviewed the chain of title on May 16, 2008 for evidence of environmental concerns including environmental liens and activity and use limitations. Based on a review of the chain of title records no environmental concerns were identified.



#### 4.3.4.2 Environmental Liens

The client indicated that they were unaware of any environmental liens or activity and use limitations existing for the Project Site. Based on a review of the chain of title records no environmental liens or activity use limitations were identified.

#### 4.3.4.3 Specialized Knowledge of the User

Mr. Brad Smith, who completed the User Questionnaire, stated that he was not aware of specialized knowledge associated with the Project Site.

#### 4.3.4.4 Commonly Known/Reasonably Ascertainable Information

Mr. Brad Smith was unaware of any commonly known information regarding the Project Site.

#### 4.3.4.5 Reason for Performing the Phase I

This Phase I Environmental Assessment was conducted with the understanding that the client wishes to obtain tax credits from the Department of Community Affairs.

#### 4.3.4.6 Relationship of Purchase Price to Fair Market Value

Mr. Brad Smith indicated that there has been no reduction in the Fair Market Value of the Project Site.

##### 4.3.4.6.1 Purchase Price

Based on the information reviewed the negotiated purchase price of the Project Site is \$648,000.00.

##### 4.3.4.6.2 Differential Between Purchase Price and Market Value

Not Applicable. United Consulting did not identify environmental conditions that would result in a reduction in the value of the property.

##### 4.3.4.6.3 Reason for Any Differential

Not Applicable.

## 5.0 SITE INFORMATION AND USE

### 5.1 Site Reconnaissance Methodology and Limiting Conditions

A reconnaissance of the Project Site was performed on April 16, 2008, to look for evidence of possible hazardous substance contamination at the Project Site. The reconnaissance consisted of an on-site, visual review by a representative from United Consulting: Mr. Ian G. Pilling, Senior Environmental Specialist. The reconnaissance was performed by walking the property



boundaries, and interior portions of the Project Site. Three undated not to scale site location maps were used to determine the boundaries of the site during this assessment.

## **5.2 General Site Setting**

The Project Site consisted of approximately 9-acres of undeveloped wooded land. The Project Site was located northeast of the intersection of Locust Grove Griffin Road and Tanger Boulevard in Locust Grove, Henry County, Georgia. Properties surrounding the Project Site consisted of mostly undeveloped wooded land and single-family residential homes. A church was located along Tanger Boulevard to the southwest of the Project Site.

## **5.3 Assessment of Commonly Known/Reasonably Ascertainable Information**

The client (Mr. Brad Smith) stated that he was unaware of any commonly known information in regards to the Project Site. Further, the interviews conducted by United Consulting did not identify commonly known information regarding the Project Site.

## **5.4 Current Site Use**

Additional discussions are provided below, as appropriate. Photographs of the Project Site are included in Appendix B.

### **5.4.1 Storage Tanks**

No above ground storage tanks (ASTs) were observed on the Project Site. No features indicative of USTs, such as fill caps, vent pipes, pump islands, or associated piping were observed at the Project Site.

### **5.4.2 Hazardous and Petroleum Products Containers/Drums**

No paint or other general chemicals were observed on the property.

### **5.4.3 Heating and Cooling**

The Project Site is currently undeveloped. No heating or cooling systems are currently utilized.

### **5.4.4 Solid Waste**

No solid waste or evidence of waste disposal was observed on the Project Site.

### **5.4.5 Sewage Disposal / Septic Tanks**

The Project Site is currently not connected to the city sewage system. No evidence of septic tanks used in the past was observed on the Project Site.

### **5.4.6 Hydraulic Equipment**

No hydraulic equipment was observed on the Project Site.

### **5.4.7 Contracted Maintenance Services**

There are currently no contracted maintenance services provided to the Project Site.



#### **5.4.8 Electrical Equipment / PCBs**

No electrical equipment and/or transformers were observed on the Project Site.

#### **5.4.9 Water Supply and Wells**

The Project Site is not currently connected to the Locust Grove water system. No wells were observed on the Project Site.

#### **5.4.10 Drains and Sumps**

No drains or sumps were observed on the Project Site.

#### **5.4.11 Pits, Ponds, Lagoons, and Surface Water**

No pits, ponds, or lagoons were observed on the Project Site during the site visit. Surface water flow was observed in the on-site streams. No unusual odors or discoloration of the water was noted.

#### **5.4.12 Stressed Vegetation**

The Project Site is currently undeveloped wooded land. No stressed or dead vegetation was observed.

#### **5.4.13 Stained Soil or Pavement**

No stained soil or pavement was observed on the Project Site.

#### **5.4.14 Odors**

No unusual odors were noted on the Project Site.

#### **5.4.15 Utilities / Roadway Easements**

No utility or roadway easements were identified during the site reconnaissance.

#### **5.4.16 Chemical Use**

No chemical use was reported on the Project Site.

#### **5.4.17 Water Leaks / Mold / Fungi / Microbial Growth**

No structures were observed on the Project Site.

#### **5.4.18 Asbestos**

The Project Site is currently undeveloped.

#### **5.4.19 Lead-Based Paint**

No structures are currently located on the Project Site. Based on the historic research it does not appear that the Project Site has ever been developed.





#### 5.4.20 Lead in Drinking Water

Based on interviews conducted with City of Locust Grove employees, the City of Locust Grove does provide water and sewer to the Project Site. Several attempts were made to obtain a water quality report from the City of Locust Grove to no avail. According to a representative with the City of Locust Grove, Mr. David Ellis is in charge of the Water Department but was on vacation and there were no one else who knew if a water quality report was available. A message was left with Mr. David Ellis; however, at the time of the issuance of this report a response had not been received. If Mr. David Ellis is able to provide a water quality report it will be provided in the future.

#### 5.4.21 Radon

United Consulting performed a cursory review of literature pertaining to the potential for elevated accumulations of radon gas to exist at the Project Site. Based on a (dated September 1993), Monroe County has a moderate potential for the presence of radon. In 1989, 1,534 homes were sampled in the State/EPA Residential Radon Survey.

Based on the data from the aforementioned study, 17 homes located in the Henry County area were tested for indoor radon gas accumulations. Based on the reported testing results, the average radon gas level detected in the Henry County homes was 1.9 picocuries per liter (pCi/L) of air and the maximum reading was 3.8 pCi/L of air. The reported average and maximum concentrations were below the current EPA action level for radon gas, which is established at 4.0 pCi/L. While no site specific data regarding accumulated indoor radon gas concentrations exists for the Project Site, the available data researched indicates the Project Site's propensity for elevated, indoor radon gas concentrations is moderate.

#### 5.4.22 Noise

Noise sources that were identified near the Project Site included the Norfolk Southern rail line located approximately 1,400 feet north of the Project Site. Based on the three Noise Assessment Location (NAL) points, the calculated the noise levels at the Project Site ranged from 62 to 65 decibels (dB), which are within the acceptable range. The noise assessment has been included in Appendix J.

#### 5.4.23 Other Site Reconnaissance Issues

No other environmental issues were observed during the site reconnaissance.

### 5.5 Past Site Use

Historical research into the Project Site was conducted to assess the history of the Project Site and surrounding areas from an environmental perspective. This research included reviewing United States Geological Survey (USGS) topographic maps, Sanborn fire insurance maps, city directories and aerial photographs, conducting interviews with people familiar with the history of the Project Site and surrounding areas, and researching chain of title information to determine the past ownership of the Project Site. The title review focused on determining whether past



ownership included industrial firms, and whether environmental liens encumber title to the Project Site. The following sections summarize the results of the historical research of the Project Site:

#### 5.5.1 Recorded Land Title Records

United Consulting representative Mr. Vince Valvo, reviewed the chain of title on May 16, 2008 for evidence of environmental concerns including environmental liens and activity and use limitations. Based on a review of the chain of title records no environmental concerns were identified. A copy of the Chain-of-Title is included in Appendix D.

#### 5.5.2 Environmental Liens

The client indicated that they were unaware of any environmental liens or activity and use limitations existing for the Project Site. Based on a review of the chain of title records no environmental liens were identified associated with the Project Site.

#### 5.5.3 Activity and Use Limitations

The client indicated that they were unaware of any activity and use limitations existing for the Project Site. Based on a review of the chain of title records no activity and use limitations were identified associated with the Project Site.

#### 5.5.4 Aerial Photographs and Topographic Maps

The USGS 7.5-minute series quadrangle topographic map of the area entitled *Locust Grove, Georgia*, 1964, was reviewed. Revisions to the 1964 *Locust Grove, Georgia* topographic map were based on aerial photographs dated 1973 and photo inspected in 1981. Aerial photographs obtained from EDR and taken in 1939, 1950, 1958, 1964, 1971, and 1987 were reviewed. A recent aerial photograph, obtained from the GoogleEarth website, was also reviewed. Sanborn Maps were not available for this area. The historic documentation reviewed is included in Appendix C.

**USGS Topographic Maps:** The 1964, 1973, and 1981 topographic maps indicated the Project Site was undeveloped wooded land. The area surrounding the Project Site was shown to be a mix of wooded land and cleared land and with scattered residential structures located throughout the area.

**Aerial Photographs:** The 1939, 1950, 1958, 1964, 1971, and 1987 aerial photographs indicated the Project Site was undeveloped wooded land. The area surrounding the Project Site consisted of wooded land and cleared farmland with scattered residential structures located throughout the area. The Google Earth aerial photograph indicated the Project Site was wooded and undeveloped.

No apparent waste dumps, tank farms, or other potential hazardous substance contamination sources were noted on the Project Site. Due to limited photographic resolution, no potential contamination sources were observed adjacent to the site when observing the aerial photographs.



#### **5.5.5 Sanborn Fire Insurance Maps**

No Sanborn Fire Insurance Maps were available for the Project Site.

#### **5.5.6 City Directories**

City Directories were not available for the property.

#### **5.5.7 Previous Environmental Studies**

No previously conducted environmental studies were provided to United Consulting for review.

### **5.6 Current Surrounding Land Use**

A foot and automobile tour of the surrounding area was conducted to assess area land use and to look for evidence of potential sources of hazardous substances on adjacent or nearby properties. The reconnaissance was performed by walking along the surrounding properties and driving along the nearby roads. The results of the reconnaissance are summarized in Table 3. Additional discussion is provided following Table 3, as appropriate.

#### **5.6.1 North**

Undeveloped wooded land and single-family residential housing

#### **5.6.2 East**

Undeveloped wooded land and single-family residential housing

#### **5.6.3 South**

Undeveloped wooded land

#### **5.6.4 West**

A park under construction and cleared and undeveloped wooded land



TABLE 3: AREA RECONNAISSANCE INFORMATION

ITEMS	Observed Yes/No	DISCUSSION (Blanks indicate items not observed on nearby properties)	REC Yes/No
Area Structures	Yes	Discussed below.	N
Area Property Use	Yes	Discussed below.	N
Wells	No		N
Tanks	No	Discussed below.	N
Drums	No		N
Other Containers	No		N
Storage Areas	Yes	The structures observed in the vicinity of the Project Site contained typical garages and sheds utilized for storage.	N
Ponds and/or Pools of Liquid or Sludge	Yes	A small pond was located to the north of the Project Site	N
Stained Soil or Pavement	No		N
Stressed Vegetation/Ground Cover	No		N
Solid Waste	No	No evidence of trash piles, land filling or burial operations was observed.	N
Odors	No	No unusual odors were noted on the adjacent properties	N
Drains and Sumps	Yes	Typical storm drains were observed along the roads and parking areas.	N

#### Area Structures/Property Use:

Several single-family residential structures were observed on the properties adjacent to the Project Site. These residences were observed to be single-family, wood framed structures. Commercial developments were located along Locust Grove Griffin Road to the west of the Project Site.

#### Tanks:

No apparent ASTs were observed on the other immediately surrounding properties. No features indicative of USTs, including fill caps, vent pipes, and dispenser pumps, were observed adjacent to the Project Site.

#### 5.7 Past Surrounding Land Use

Historical research of the areas surrounding the Project Site from an environmental perspective was conducted. This research included reviewing United States Geological Survey (USGS) topographic maps and aerial photographs, and conducting interviews with people familiar with the history of the areas surrounding Project Site. The following sections summarize the results of the historical research of the areas surrounding the Project Site:



#### 5.7.1 North

The properties north of the Project Site historically were undeveloped wooded and cleared land with scattered residential structures located further to the north.

#### 5.7.2 East

The property to the east of the Project Site was historically cleared agricultural land.

#### 5.7.3 South

The property to the south of the Project Site was historically cleared agricultural land.

#### 5.7.4 West

The properties west of the Project Site were historically cleared agricultural land and wooded land with scattered residential structures located further to the west.

In United Consulting's professional opinion, no off-site current or historic facilities represent RECs in relation to the Project Site. Further, no current or historic on-site issues were identified that represent RECs to the Project Site. Based on the entirety of the historical review, no indications of RECs to the Project Site were identified.

## 6.0 DATA GAPS

### 6.1 Identification of Data Gaps

United Consulting conducted a thorough review on the use of the Project Site during completion of this Phase I Environmental Assessment. The historical research included sources from 1930 to present. Table 4 below summarizes many of the *common* data failures/gaps encountered during the completion of a Phase I Environmental Assessment.

### 6.2 Sources of Information Consulted to Address Data Gaps

Per ASTM and AAI standards, United Consulting has relied on 'User Provided Information' to complete this property assessment. If the user fails to provide this information to United Consulting, it could result in a determination that "all appropriate inquiry" for this site is incomplete. Further, United Consulting is not responsible for any errors or omissions associated with the User Provided Information.

### 6.3 Significance of Data Gaps

If a significant data gap is identified in the table, a discussion of the data gap and conclusions associated with the gap will follow.



TABLE 4: SUMMARY OF POTENTIAL DATA FAILURES/GAPS

Report Section	Information/Data	Data See Descriptions Below	Significant Data Gap (Y/N/NA)	Additional Action(s) Required (Y/N/NA)
<i>User Provided Information</i>				
4.3.4.1	Title History	Obtained	N	N
4.3.4.2	Environmental Lien Review	Obtained	N	N
4.3.4.3	Specialized Knowledge	Client Provided	N	N
4.3.4.4	Commonly Known Information	Client Provided	N	N
4.3.4.6	Valuation Reduction for Environmental Issues	Client Provided	N	N
<i>Historical Use Information</i>				
5.5.4	Topographic Maps	Obtained	N	N
5.5.4	Aerial Photographs	Obtained	N	N
5.5.5	Sanborn Fire Insurance Maps	Obtained	N	N
5.5.6	City Directories	Obtained	N	N
<i>Site Reconnaissance</i>				
5.1	Exterior Accessibility	Accessible	N	N
5.1	Interior Accessibility	NA	N	N
<i>Area Reconnaissance</i>				
5.6	Accessibility	Accessible	N	N
<i>Interviews</i>				
4.3.1	Property Owner	Obtained	N	N
4.3.2	Site Manager/Occupants/Local Residents	Obtained	N	N
4.2	Local Government Officials	Partially Obtained	N	N
Notes: Common Data Descriptions: Not Provided, Provided, Not Contacted, Contacted, Accessible, Not Accessible, Obtained, Not Obtained, Gap, Failure, NA = Not Applicable Per ASTM E 1527-05, failure to provide the 'user provided information' to the environmental professional could result in a determination that "all appropriate inquiry" for this site is incomplete.				

As stated in section 4.2 of this report, United Consulting was unable to reach the local utility company regarding PCB-containing equipment. However, no transformers or other potential PCB-containing equipment was observed on the Project Site. Therefore, in our professional opinion, information obtained from this source would not likely change the conclusions of this assessment; therefore, in United Consulting's opinion, this does not represent a Significant Data Gap. If a response is received, United Consulting will issue an addendum to this report, if necessary.

## 7.0 ENVIRONMENTAL CONCERNS

### 7.1 On-Site

The Project Site consisted of approximately 9-acres of undeveloped wooded land. The Project Site was an irregular shaped parcel located to the northeast of the intersection of Tanger Boulevard and Locust Grove Griffin Road. The Project Site was not listed on the federal or state



databases reviewed. No visual evidence of RECs on the Project Site such as stained soils, stressed vegetation, drums, land filling, or illegal disposal of hazardous substances was identified. Based on our research, historically, the Project Site has been undeveloped wooded land since at least 1939. Based on the entirety of the Phase I Environmental Site Assessment, no on-site RECs were identified.

### 7.2 Off-Site

Surrounding properties consisted of undeveloped wooded land or were developed with single-family residential structures. Two listed, regulated facilities and one other notable facility were identified within the prescribed search distances from the Project Site. Based on distance, topography, and/or age of the facilities, in United Consulting's opinion, these regulated facilities are not RECs to the Project Site.

## 8.0 CONCLUSIONS AND RECOMMENDATIONS

### 8.1 On-Site

United Consulting has performed a Phase I Environmental Assessment for the Project Site. The assessment is in substantial conformance with the scope and limitations of ASTM Practice E 1527-05 and with the environmental guidelines established by the DCA, dated 2008. Based on this assessment, research, site reconnaissance, and investigation, evidence of "on-site" RECs were not identified on the Project Site. No further investigation or action is recommended to determine the presence of "on-site" RECs on the Project Site.

### 8.2 Off-Site

United Consulting has performed a Phase I Environmental Assessment of the Project Site in substantial conformance with the applicable scope and limitations of ASTM Practice E 1527-05 and the guidelines established by the DCA, dated 2008. No further investigation or action is recommended to determine the presence of "off-site" RECs.

## 9.0 DATA REFERENCES

Federal Emergency Management Agency, National Flood Insurance Program, Flood Insurance Rate Map, City of Forsyth, Georgia, Community Panel Number 130359, April 11, 1975

*Geologic Map of Georgia*, 1976, Georgia Geological Survey.

[www.websoilsurvey.nrcs.usda.gov/app](http://www.websoilsurvey.nrcs.usda.gov/app); *Soil Survey of Henry County*

United States Geologic Survey, 7.5 Minute Topographic Map, *Locust Grove, Georgia* Quadrangle, dated 1964, photorevised 1973, photo inspected 1981



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*EPA's Map of Radon Zones, Georgia*, Radon Division Office of Radiation and Indoor Air US EPA, 1993

www.edrnet.com: Regulatory Review and aerial photographs dated 1939, 1950, 1958, 1964, 1971, and 1987.

www.googleearth.com: recent aerial photograph

Local Brownfield Lists: GA EPD <http://www.gaepd.org/>

Ms. Pam Taylor: Henry County Code Enforcement

Mr. Tim Young, Locust Grove Planning and Zoning

Ms. Barbara Terry, EPD Corrective Action Program

Ms. Tammy Coles, the Henry County Environmental Health Department

Mr. David Allen, Locust Grove Water Department

Mr. Eddie Walker, Walker and Associates

American Society for Testing and Materials (ASTM) and with the United States Environmental Protection Agency (EPA), "All Appropriate Inquiry" Rules, dated November 1, 2006 (Rules)

DCA's 2008 Environmental Manual

## 10.0 VALUATION REDUCTION

### 10.1 Purchase Price

Based on the information reviewed the negotiated purchase price of the Project Site is \$648,000.00.

### 10.2 Interview of Broker Regarding Market Value

United Consulting contacted Mr. Eddie Walker with Walker and Associates, the broker for the Project Site on May 19, 2008. Mr. Walker stated that in his opinion the price of the property was reflective of the pricing and value of the area. Further, Mr. Walker stated that he knew of no environmental concerns associated with the Project Site that would lead to a value reduction for the property.





### 10.3 Differential between Purchase Price and Market Value

Based on the information reviewed and the interviews conducted there is no differential between the purchased price and the market value.

### 10.4 Environmental Reasons For Any Differential

United Consulting did not identify environmental conditions that would result in a reduction in the value of the property.

