

EXHIBIT CC



ENVIRONMENTAL
MANAGEMENT
SYSTEMS, INC.

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Milwaukie, OR 97222

27 November 2018

Report # 18-0185

Aron Faegre & Associates
520 SW Yamhill Street PH1
Portland, OR 97204

REGARDING: Preliminary Site Evaluation. TLM Holdings Inc 1437 Keil Road NE Echo Hanger
Aurora, OR 97002. T: 4S, R: 1W, Section 02D, TL: 800 & 900

Dear Mr. Faegre,

As requested, Environmental Management Systems Inc. (EMS) has performed the following services and provides this report for your use. On 12 October 2018, EMS conducted a site evaluation to identify the possibility of alternative treatments or methods that could be used to treat wastewater onsite. This report details our findings and recommendations.

PROJECT DESCRIPTION:

The client's goal is to build an extension for the airfield facilities including taxiway extension providing access to the runway, three shop/office three story buildings, one office/shop building, and a parking lot. This preliminary investigation is intended to determine suitability of the site for onsite wastewater treatment of domestic strength wastewater. Incidental spills or high strength industrial wastewater will not be discharged on site. Such discharges will be collected via containment facilities, routed to holding tanks for pumping and removal to appropriate treatment facilities.

SUMMARY:

The site has been evaluated for potential Wastewater Treatment Facility options. The site does not appear to have soils appropriate for an on-site system, so other DEQ approvable options will likely need to be utilized. It is our professional opinion the all of the following options appear feasible for the development on this site to attain a wastewater treatment through the Oregon Department of Environmental Quality (DEQ): Water Pollution Control Facility (WPCF) permit using an Easement for the Drainfield on another property, a Holding Tank via WPCF permit, or becoming part of the adjacent condo association's property and WPCF permit, or treatment with discharge to surface water located to the east across Airport Way via a National Pollutant Discharge Elimination (NPDES) permit.

The selection of which of these options to pursue will depend on a cost analysis of the various options, such that the least expensive option can be selected. Currently it is believed that using the existing HDSE wastewater system with appropriate expansion, will be the least expensive option. All configurations involving off-site locations will require legal access to the discharge point which have not yet been investigated in depth. You may also want to consider

opportunities for recycling treated wastewater for beneficial uses, such as: Fire Suppression, wash-down water, toilet flushing, irrigation and stream re-charge. A detailed evaluation of proposed or estimate of future tenant occupancy and wastewater production patterns will be needed.

METHODS: The following methods were used in this phase:

Observation Measurement Staking Soil Evaluation
Sampling Inspection Laser Elevations Total Station
Gov Records Interview Aerial Photo Soil Survey
Geologic Maps Wetland Inventories LIDAR other (specify)

LIMITATIONS: This is a preliminary report only, using hand measurements and observations. More extensive work and investigation will be needed to fully develop the required level of detail for permit and construction approvals.

FINDINGS:

Existing Uses for the Property.

The subject property is currently undeveloped but was previously used as Missionary Memorial Church camp. The previous church buildings have been abandoned but not demolished. Trees on site were removed. Spoils from tree removal are stored in various parts of the lot. Most of soil on the lot was significantly disturbed by excavation equipment.

Availability of Sewer & Water

Public Sewer and Water are not available. The site has its own potable water well. The Aurora Airport Water Control District fire protection water can be extended to serve the site.

Existing Septic System

A drainage pipe of the type used for drainfield or site drains was observed onsite, however, no records were found at Marion county regarding the existing onsite wastewater system(s). Given the age of the existing now defunct facilities, any onsite wastewater systems would not be suitable for use.

Current Utilities on Site

Electricity is unknown.

Zoning

The site is zoned as Exclusive Farm Use (EFT), but has been decades long taken out of farm service and used as a church camp with a Marion County approved conditional use permit.

Topography / Geology / Site Stability

The site is generally very flat. Contour mapping found on Marion County Maps (<https://marioncounty.maps.arcgis.com/home/webmap/viewer.html?useExisting=1>). An average elevation of about 190 feet above sea level. Indicators of instability were not apparent.

Vegetation

Vegetation on the property has been removed, with only a few ornamental shrubs and ground cover present.

Soils

The soil on site is mapped as "Am" Amity silt loam, 0-3 percent slopes by USDA Natural Resource Conservation Service (NRCS). This soil type is typically found on terraces with a parent material of mixed silty alluvium. It is rated as hydric and considered "somewhat poorly drained" with a depth to water table being 6-18 inches. This mapping was confirmed by hand augering and evaluation of the soil in five locations throughout the site during the site evaluation.

Soil texture was determined by feel using the NRCS method (Thien, 1979) and was found to be silt loam over a denser layer of silty clay loam. Standing water was not observed at the bottom of test pits, however there were distinct Redoximorphic Features (reduction & oxidation of soil iron) at depths from 3 to 8 inches. Distinct redoximorphic features were observed within 8 inches of the soil surface (3 inches in TP1, 4 inches in TP3), including mottling and iron concentrations in pore linings. This indicates conditions associated with saturation; likely a high seasonal water table.

Wetlands / Surface Water

No surface waters were observed during the site evaluation. No wetlands are mapped on the site by the National Wetland Inventory (US Fish & Wildlife) or any local wetland inventories. Saturated soil was observed within 3 to 8 inches of the surface of the lot. Extensive ditching along Airport Way conveys water to natural water ways flowing to the east.

CONCLUSIONS:

1. Onsite wastewater treatment does not appear feasible at this site. Challenges to the site include disturbed soil, a high seasonal water table, and limited space because of proposed development.
2. Most of the soil on the site has been disturbed from scraping and grading. More construction work for removal of tree spoils and old structures will disturb the soil to an even higher degree.
3. Test pits and auger holes revealed evidence of a shallow depth to water. It is possible the depth to water table may be increased with a Tile Dewatering System, but this would not guarantee approval from the county and/or DEQ. A winter water table evaluation may also be required to verify the depth of the seasonal water table. EMS' experience with sites in the vicinity leads us to conclude that the indicators of saturation are correct and that a high water table exists at least seasonally.
4. Tile Dewatering System – A tile dewatering system is unlikely to be sufficiently effective at lowering the seasonal water table. Approval from the county or DEQ is not guaranteed. If attempted, a TDS will need to drain to a natural outlet – likely east of Airport Rd or through Helicopter Transport Services property and continuing to drainage to the south – east toward the Pudding River.

5. Fill soil. Adding Fill soil to raise the depth above the water table is technically feasible, but is typically not allowed by DEQ or its Agents for new development.

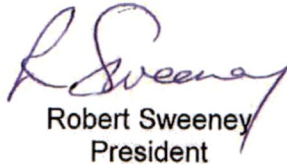
RECOMMENDATIONS: The following additional steps or services appear to be needed:

1. Feasibility Approval – For soil-based treatment, an off-site area with suitable conditions will need to be found. Additional test pits will need to be investigated and an easement route identified during a more detailed site evaluation. Other facilities at the Aurora Airport have been successful in using land along the airstrip for onsite wastewater drainfields. The area to the east may be suitable, if the owner will allow access for an easement. Another option is to use areas around the runway and taxiways, as other airport tenants use, and this will require further test pits.
2. Topographic Survey – Yes, to accurately identify microtopography across the site and elevations for wastewater treatment system design.
3. Hydrogeological Studies – May be needed. A winter evaluation may be required to demonstrate the effectiveness of the tile dewatering system.
4. Onsite Wastewater Treatment System Design. Yes.
 - a. Alternatives: Public Sewer and Water are not available. The proposed facility will need additional information on the quantity and quality of the wastewater to be generated in order to develop plans and rely on one of the following:
 - i. Onsite Wastewater Treatment with via a Water Pollution Control Facility (WPCF) permit and highly treated effluent to be pumped to a drainfield located in an off-site easement area via an easement. Easement areas will need to be identified. Other properties in the complex have been successful in gaining approvals for WPCF permits using drainfields in easements along the sides of the runway. Off-site areas to the east have not yet been investigated.
 - ii. Onsite Wastewater Treatment with discharge to surface water via a National Pollutant Discharge Elimination System (NPDES) permit. This option may also involve wastewater re-use for beneficial purposes, including but not limited to: Fire Suppression, Wash-down Water, Irrigation, Toilet Flushing and/or Stream Recharge. (See Attached Beneficial Uses Table).
 - iii. Holding Tanks via Water Pollution Control Facility (WPCF) permit to be pumped and removed for disposal at a Sewage Treatment Plant. While less expensive to install, this option has high operational costs for pumping and removal at approximately \$0.20 to \$0.40 per gallon.
 - iv. Join this property with the Southend Corporate Airpark and become part of that condominium - and expand that existing septic system to handle the flows from this added development.

DISCLOSURE: The information and statements in this report are true and accurate to the best of our knowledge. Neither Environmental Management Systems, Inc., nor the undersigned have any economic interests in the project.

To carry out the above listed recommendations, contact us for an Agreement for Professional Services. Thank you for your business, and we look forward to assisting you to achieve your development objectives. If you have any questions, please contact Emma Eichhorn or me at 503-353-9691.

Sincerely,



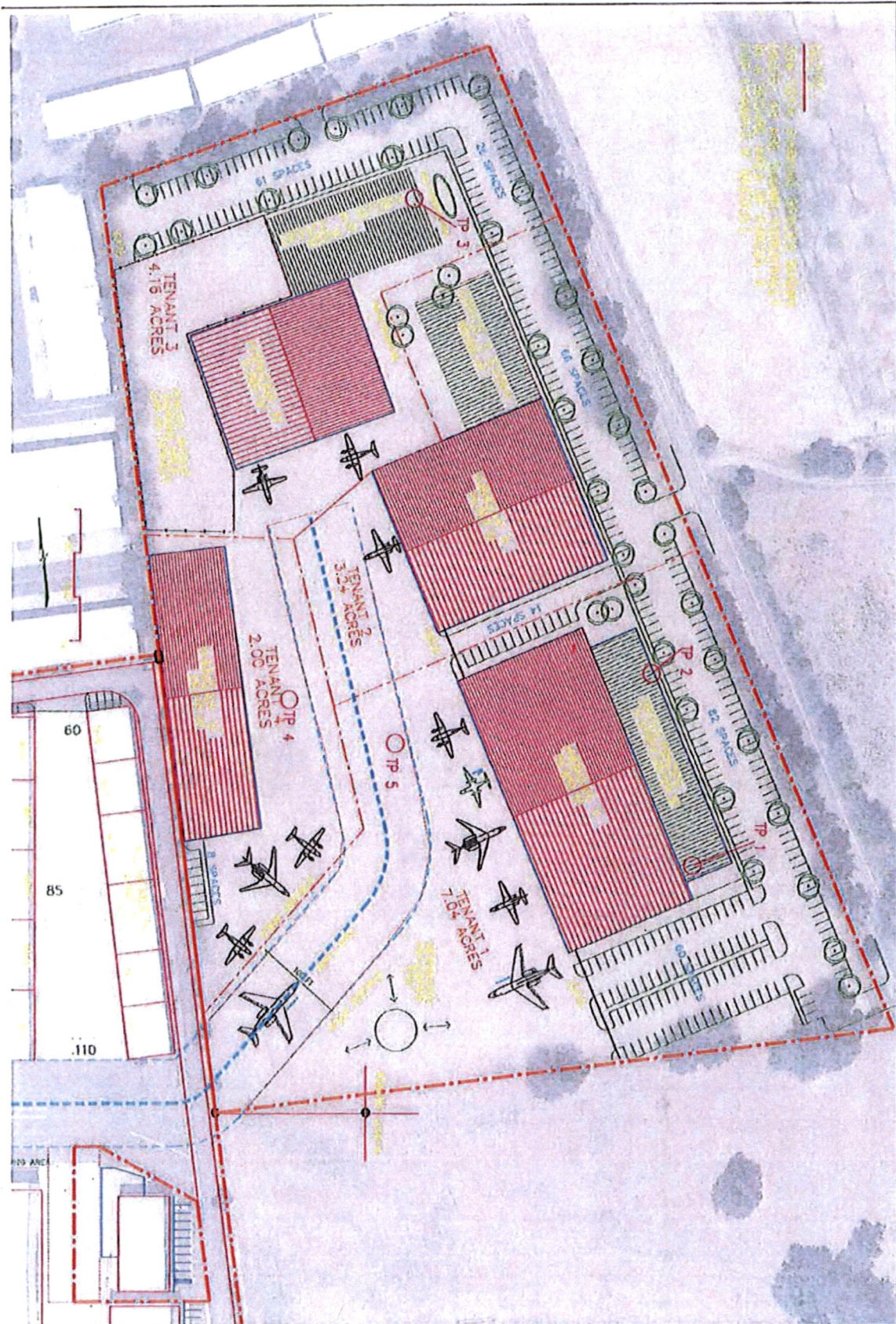
Robert Sweeney
President


ENVIRONMENTAL MANAGEMENT SYSTEMS, Inc.

Enclosed:

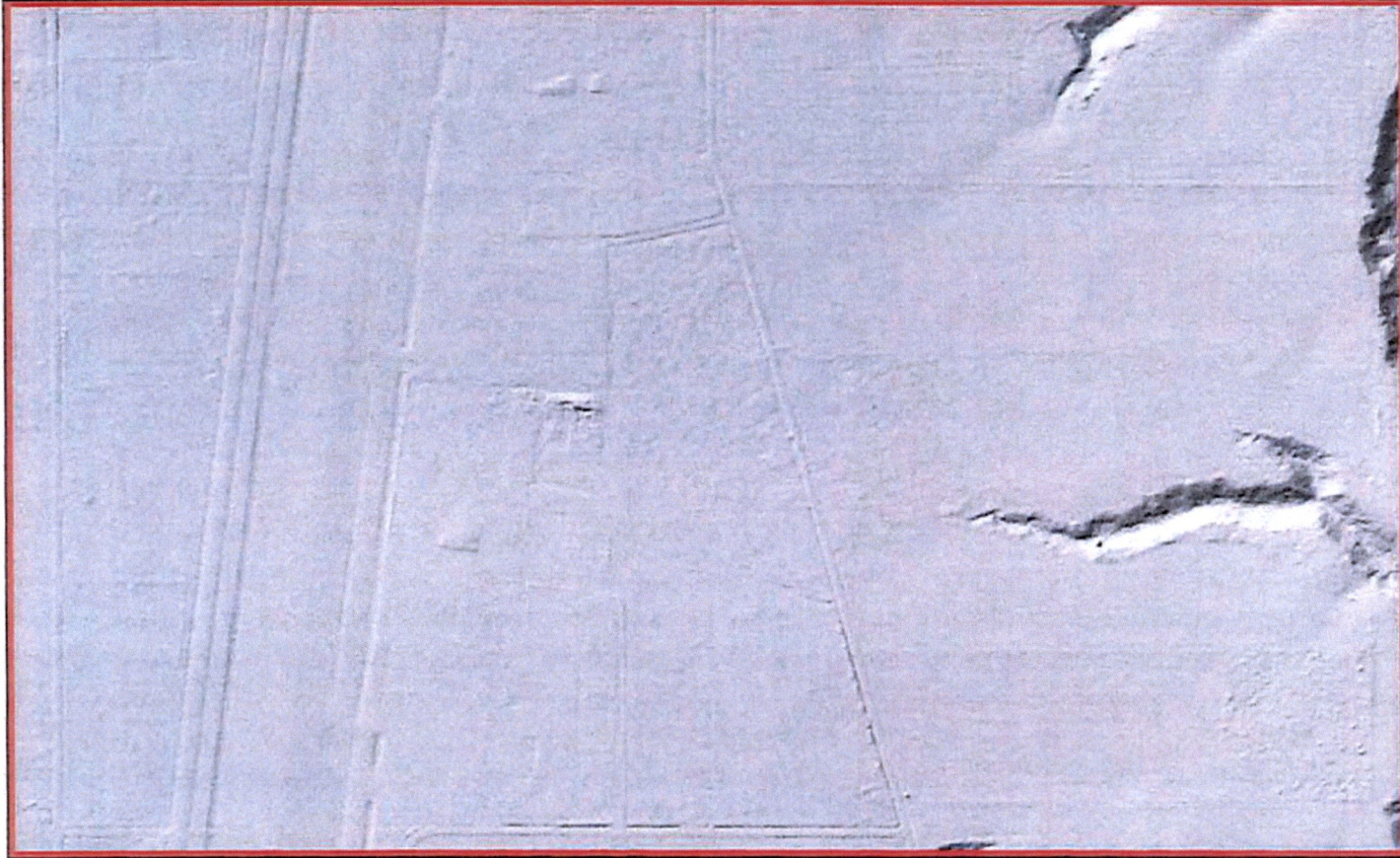
Site Plan – Test pits location
Tax Lot Map
LIDAR
NRCS Soil Map
Beneficial Use Chart





 <p>803-553-9091 360-235-1125 www.emsngsys.com</p> <p>420000 Painesville Way EPA 8110 Wash, DC 21222</p> <p>ENVIRONMENTAL MANAGEMENT SYSTEMS, INC.</p>	DEDED	AURORA AIRPORT	18-0185
	0715A	T:4S, R:1W, Sec:02D, TL: 800 & 900	01 NOV 2018
		TEST PITS LOCATIONS	1 OF 4

Aurora Airport Lidar



October 24, 2018
 Bare Earth Lidar Hillshade
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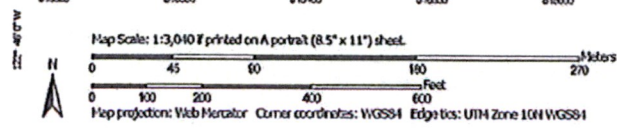
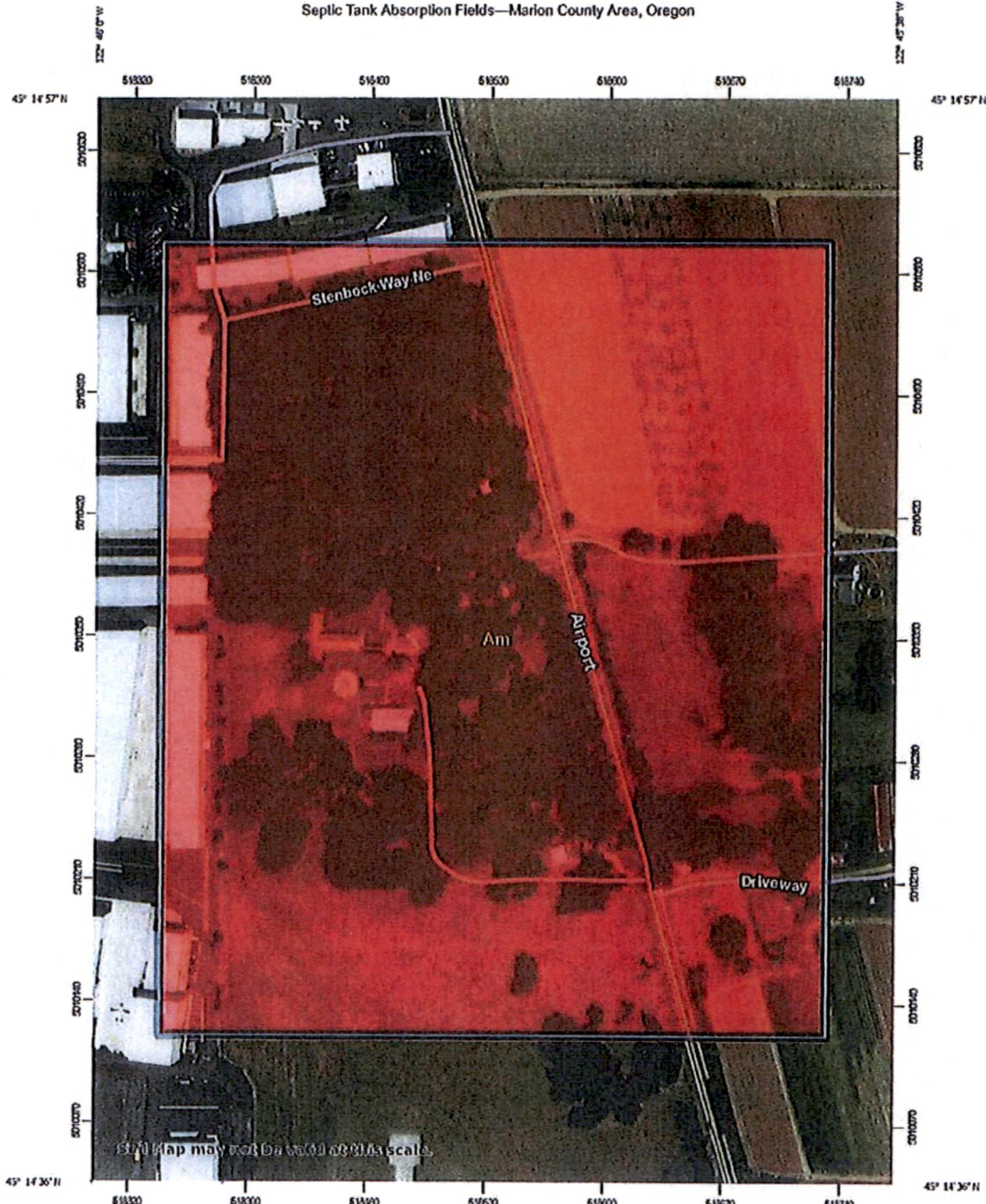
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	LIDAR MAP	2 OF 4

Septic Tank Absorption Fields—Marion County Area, Oregon



USDA Natural Resources Conservation Service

Web Soil Survey National Cooperative Soil Survey

10/10/2018 Page 1 of 5



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





NRCS MAP

18-0185

24 OCT 2018

4 OF 4

Septic Tank Absorption Fields—Marion County Area, Oregon

MAP LEGEND		MAP INFORMATION
<p>Area of Interest (AOI)</p> <p> Area of Interest (AOI)</p>	<p>Background</p> <p> Aerial Photography</p>	<p>The soil surveys that comprise your AOI were mapped at 1:20,000.</p> <div style="border: 1px solid black; padding: 5px;"> <p>Warning: Soil Map may not be valid at this scale.</p> <p>Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.</p> </div> <p>Please rely on the bar scale on each map sheet for map measurements.</p> <p>Source of Map: Natural Resources Conservation Service Web Soil Survey URL: Coordinate System: Web Mercator (EPSG:3857)</p> <p>Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.</p> <p>This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.</p> <p>Soil Survey Area: Marion County Area, Oregon Survey Area Data: Version 15, Sep 18, 2018</p> <p>Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.</p> <p>Date(s) aerial images were photographed: Aug 19, 2015—Sep 13, 2016</p> <p>The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.</p>
<p>Soils</p> <p>Soil Rating Polygons</p> <p> Very limited</p> <p> Somewhat limited</p> <p> Not limited</p> <p> Not rated or not available</p> <p>Soil Rating Lines</p> <p> Very limited</p> <p> Somewhat limited</p> <p> Not limited</p> <p> Not rated or not available</p> <p>Soil Rating Points</p> <p> Very limited</p> <p> Somewhat limited</p> <p> Not limited</p> <p> Not rated or not available</p>	<p>Water Features</p> <p>Streams and Canals</p> <p>Transportation</p> <p> Rails</p> <p> Interstate Highways</p> <p> US Routes</p> <p> Major Roads</p> <p> Local Roads</p>	

Septic Tank Absorption Fields

Map unit symbol	Map unit name	Rating	Component name (percent)	Rating reasons (numeric values)	Acres In AOI	Percent of AOI
Am	Amity silt loam	Very limited	Amity (85%)	Depth to saturated zone (1.00)	44.5	100.0%
				Slow water movement (1.00)		
			Concord (5%)	Ponding (1.00)		
				Depth to saturated zone (1.00)		
Totals for Area of Interest					44.5	100.0%

Rating	Acres In AOI	Percent of AOI
Very limited	44.5	100.0%
Totals for Area of Interest	44.5	100.0%

Description

Septic tank absorption fields are areas in which effluent from a septic tank is distributed into the soil through subsurface tiles or perforated pipe. Only that part of the soil between depths of 24 and 60 inches is evaluated. The ratings are based on the soil properties that affect absorption of the effluent, construction and maintenance of the system, and public health. Saturated hydraulic conductivity (Ksat), depth to a water table, ponding, depth to bedrock or a cemented pan, and flooding affect absorption of the effluent. Stones and boulders, ice, and bedrock or a cemented pan interfere with installation. Subsidence interferes with installation and maintenance. Excessive slope may cause lateral seepage and surfacing of the effluent in downslope areas.

Some soils are underlain by loose sand and gravel or fractured bedrock at a depth of less than 4 feet below the distribution lines. In these soils the absorption field may not adequately filter the effluent, particularly when the system is new. As a result, the ground water may become contaminated.

The ratings are both verbal and numerical. Rating class terms indicate the extent to which the soils are limited by all of the soil features that affect the specified use. "Not limited" indicates that the soil has features that are very favorable for the specified use. Good performance and very low maintenance can be expected. "Somewhat limited" indicates that the soil has features that are moderately favorable for the specified use. The limitations can be overcome or minimized by special planning, design, or installation. Fair performance and moderate maintenance can be expected. "Very limited" indicates that the soil has one or more features that are unfavorable for the specified use. The limitations generally cannot be overcome without major soil reclamation, special design, or expensive installation procedures. Poor performance and high maintenance can be expected.

Numerical ratings indicate the severity of individual limitations. The ratings are shown as decimal fractions ranging from 0.01 to 1.00. They indicate gradations between the point at which a soil feature has the greatest negative impact on the use (1.00) and the point at which the soil feature is not a limitation (0.00).

The map unit components listed for each map unit in the accompanying Summary by Map Unit table in Web Soil Survey or the Aggregation Report in Soil Data Viewer are determined by the aggregation method chosen. An aggregated rating class is shown for each map unit. The components listed for each map unit are only those that have the same rating class as listed for the map unit. The percent composition of each component in a particular map unit is presented to help the user better understand the percentage of each map unit that has the rating presented.

Other components with different ratings may be present in each map unit. The ratings for all components, regardless of the map unit aggregated rating, can be viewed by generating the equivalent report from the Soil Reports tab in Web Soil Survey or from the Soil Data Mart site. Onsite investigation may be needed to validate these interpretations and to confirm the identity of the soil on a given site.

Rating Options

Aggregation Method: Dominant Condition

Component Percent Cutoff: None Specified

Tie-break Rule: Higher

Recycled Water Beneficial Purposes

Beneficial Purpose	Class A	Class B	Class C	Class D	Nondisinfected
Irrigation					
Fodder, fiber, seed crops not intended for human ingestion, commercial timber	Yes	Yes	Yes	Yes	Yes
Firewood, ornamental nursery stock, Christmas trees	Yes	Yes	Yes	Yes	No
Sod	Yes	Yes	Yes	Yes	No
Pasture for animals	Yes	Yes	Yes	Yes	No
Processed food crops	Yes	Yes	Yes	No	No
Orchards or vineyards if an irrigation method is used to apply recycled water directly to the soil	Yes	Yes	Yes	No	No
Golf courses, cemeteries, highway medians, industrial or business campuses	Yes	Yes	Yes	No	No
Any agricultural or horticultural use	Yes	No	No	No	No
Parks, playgrounds, school yards, residential landscapes, other landscapes accessible to the public	Yes	No	No	No	No
Industrial, Commercial, or Construction					
Industrial cooling	Yes	Yes	Yes	No	No
Rock crushing, aggregate washing, mixing concrete	Yes	Yes	Yes	No	No
Dust control	Yes	Yes	Yes	No	No
Nonstructural fire fighting using aircraft	Yes	Yes	Yes	No	No
Street sweeping or sanitary sewer flushing	Yes	Yes	Yes	No	No
Stand alone fire suppression systems in commercial and residential buildings	Yes	Yes	No	No	No
Non-residential toilet or urinal flushing, floor drain trap priming	Yes	Yes	No	No	No
Commercial car washing	Yes	No	No	No	No
Fountains when the water is not intended for human consumption	Yes	No	No	No	No

Beneficial Purpose	Class A	Class B	Class C	Class D	Nondisinfected
Impoundments or Artificial Groundwater Recharge					
Water supply for landscape impoundments including, but not limited to, golf course water ponds and non-residential landscape ponds	Yes	Yes	Yes	No	No
Restricted recreational impoundments	Yes	Yes	No	No	No
Nonrestricted recreational impoundments including, but not limited to, recreational lakes, water features accessible to the public, and public fishing ponds	Yes	No	No	No	No
Artificial groundwater recharge	Yes	No	No	No	No