

# Phase I

## Environmental Site Assessment Garden Apartments

### Subject Property:

**Property Address, City, State Zip**

**Freddie Mac Loan Number: TBD**

**Client Project Number: TBD**

### Engaged By:

**Client Name:** Client Contact

**Client Company:** Client Name

**Client Address:** Street Address, City, State, Zip

**Order Number:** Project Number

**Date of Engagement:** Date of Engagement

**Report Date:** Report Date

Date: Report Date

Client Contact  
Client Contact Title  
Client Name  
Street Address  
City, State Zip

Freddie Mac Loan Number: TBD  
Client Project Number: TBD

Dear Client Contact,

CREtelligent was contracted by you on behalf of Client Name (herein referred to as the “Client”) to conduct a Phase I Environmental Site Assessment (herein referred to as “ESA”) on a Garden Apartments located at Property Address, City, State Zip (herein referred to as the “Subject Property”) (Client Project Number TBD). CREtelligent received written authorization from the Client on Date of Engagement to perform the ESA. This ESA was performed in general accordance with the scope and limitations of ASTM E1527-21, the “All Appropriate Inquiries” (“AAI”) rule, promulgated by the EPA (40 C.F.R Part 312), as amended, supplemented, or restated from time to time (“All Appropriate Inquiries”); Freddie Mac Multi-Family Seller/Service Guide-Environmental Reporting Requirements, and the Engagement Agreement for Services Proposal Project Number executed by the Client. Exceptions to or deletions from this protocol are discussed in this report.

We appreciate your business. If you have any questions regarding the attached report, or if we can be of any further service to you, please do not hesitate to contact us at (866) 901-7201.

Sincerely,

National Account Manager  
Direct Line: (866) 901-7201  
accountmanager@cretelligent.com

**Project Summary Table**

CREtelligent has performed a Phase I Environmental Site Assessment (ESA) for the property at Property Address, City, State Zip (Subject Property) dated Report Date. This ESA was conducted at the request of Client Name using procedures and practices conforming with the ASTM E1527-21, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and the current Freddie Mac Multi-Family Seller/Service Guide-Environmental Reporting Requirements.

REPORT SECTION	NFA	REC	CREC	HREC	BER	DE-MINIMIS	SECTION
Subject Property General Characteristics	✓						2.1
Historical Use Summary	✓						3.5
Subject Property Regulatory Database Review	✓						4.1
Off-Site Regulatory Database Review	✓						4.2
Interviews	✓						5.1
Summary of Previous Investigations	✓						5.2
Agency Records Review	✓						5.3
Observations Checklist	✓						6.2
Asbestos Containing Material					✓		7.1
Radon					✓		7.2
Lead Based Paint					✓		7.3
Mold	✓						7.4

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Appendix A: Freddie Mac Form 1103

Draft

## 1.0 EXECUTIVE SUMMARY

CREtelligent has performed a Phase I Environmental Site Assessment (ESA) for Client Name on the Garden Apartments, located at Property Address, City, State (Subject Property) dated Report Date. CREtelligent performed the Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-21, the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), and the Freddie Mac Multi-Family Seller/Service Guide, Chapter 61, Environmental Reporting Requirements of the Subject Property. Any exceptions to, or deletions from, this practice are described in [Section 8.0, "About this Environmental Assessment Report"](#) of this report. This assessment evaluated potential environmental liabilities resulting from past and current land uses. The following summary is meant to provide an overview of the report findings. The Client should not draw any conclusions or take any actions without reading this ESA report in its entirety.

A [Subject Property Map](#) and [photographs](#) of the Subject Property are included in the appendices of this report.

Pertinent information on the Subject Property and a summary of the conclusions and findings are noted below:

### Subject Property Information

Property Use	Multifamily
Year Constructed	1975
Number of Parcels	2
Assessor Parcel Number	Parcel ID
Subject Property Acreage	10.2
Number of Units	275
Number of Buildings	12
Number of Stories	Three
Total Building Square Footage	275,000 SF
Additional Improvements	Additional improvements include a single-story leasing office/clubhouse w/swimming pool
Current Commercial Tenants	N/A
Site Assessor	Site Assessor Name

### 1.1 Conclusions and Findings

<b>RECOGNIZED ENVIRONMENTAL CONDITION (REC):</b>
This assessment did not reveal evidence of a REC in connection with the Subject Property.
<b>HISTORICAL RECOGNIZED ENVIRONMENTAL CONDITION (HREC):</b>
This assessment did not reveal evidence of a HREC in connection with the Subject Property.
<b>CONTROLLED RECOGNIZED ENVIRONMENTAL CONDITION (CREC):</b>
This assessment did not reveal evidence of a CREC in connection with the Subject Property.
<b>DE MINIMIS CONDITION:</b>
This assessment did not reveal evidence of De Minimis Condition in connection with the Subject Property.
<b>BUSINESS ENVIRONMENTAL RISK (BER):</b>
This assessment did not reveal evidence of a BER in connection with the Subject Property.
<b>SIGNIFICANT DATA GAP:</b>
This assessment did not reveal evidence of a significant data gap in connection with the Subject Property.

### Non-Scope Considerations

<b>ASBESTOS CONTAINING MATERIAL (ACM)</b>
<p>The following ACM concerns were identified:</p> <ul style="list-style-type: none"> <li>In accordance with the Freddie Mac Multi-Family Seller/Service Guide-Environmental Reporting Requirements, CREtelligent collected 12 samples of on-site friable building materials (popcorn ceiling texture). Based on the results of the limited asbestos sampling, asbestos (2-3% Chrysotile) was identified in the popcorn ceiling finishes throughout the Subject Property. This material was observed to be in good condition and encapsulated under several layers of fresh paint. Based on the observed condition, the potential for fiber release is low. The non-friable materials observed, which included resilient flooring material, flooring mastic, drywall, joint compound, and roofing materials, were observed in good condition at the time of CREtelligent's site reconnaissance.</li> </ul>

<b>RADON</b>
<p>The following Radon concerns were identified:</p> <ul style="list-style-type: none"> <li>Based on the results of short-term radon testing, elevated radon concentrations (above 4.0 pCi/L), were identified in six of the 31 units tested.</li> </ul>
<b>LEAD BASED PAINT (LBP)</b>
<p>The following LBP concerns were identified:</p> <ul style="list-style-type: none"> <li>Due to the age of the Subject Property, constructed in 1975, there is a potential that LBP is present. All observed painted surfaces were in good condition with no evidence of peeling or flaking surfaces in the units observed.</li> </ul>
<b>MOLD</b>
<p>The following mold concerns were identified:</p> <ul style="list-style-type: none"> <li>None</li> </ul>

## 1.2 Recommendations

Based on the information referenced in this ESA, CREtelligent recommends the following:

- CREtelligent recommends that additional short-term radon testing of 25% of the ground-contact units within the buildings. This is to include the units that tested at 4.0 pCi/L or greater during the first round of testing. Of note, remediation is required if the average of the two short-term tests is 4.0 pCi/L or greater. This would include the installation of a radon mitigation system in all buildings having a unit with a radon concentration of 4.0 pCi/L or greater.
- Based on the confirmed presence of asbestos within the popcorn ceiling texture, which was observed to be in good condition, CREtelligent recommends that these materials be managed under an Asbestos Operations and Maintenance (O&M) Program.
- Based on the condition of the painted surfaces observed on-site, CREtelligent recommends that all painted surfaces be managed under the current LBP operations and maintenance (O&M) program. The objective of the O&M program is to implement a practical management approach to controlling LBP at the Subject Property, by monitoring its condition, controlling any activities that might impact the LBP, and responding promptly should the material be damaged.



### 1.3 Project Personnel

Per ASTM standard, this report has been prepared with oversight and final review by an Environmental Professional (EP) as defined in §312.10 of 40 Code of Federal Regulations (CFR) Part 312.

I declare that, to the best of my professional knowledge and belief, I meet the definition of EPA-Certified Environmental Professional as defined in §312.10 of 40 Code of Federal Regulations (CFR) Part 312 and we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. We have developed and performed the all appropriate inquiries in general accordance with the standards and practices set forth in 40 CFR Part 312.

The following CREtelligent personnel were directly responsible for the preparation of this report:

Project Manager  
Project Manager

Senior Project Manager  
Environmental Professional

*The resumes of the EP and Project Managers are provided in Appendix-[Consultant Resumes](#).*

## 2.0 SUBJECT PROPERTY INFORMATION

The Subject Property information is based on publicly-available information, information obtained during the site reconnaissance, information provided by the Client, on-line property assessor information, Google Earth, Google Street view, and/or other readily available resources.

### 2.1 Subject Property General Characteristics

IDENTIFIER	DESCRIPTION OF IDENTIFIED ITEMS
Property Use:	Multifamily
Subject Property Address	Property Address, City, State Zip
Number of Parcels	2
Assessor Parcel Number (APN)	Parcel ID
Subject Property Acreage	10.2
Number of Buildings	12
Number of Units	275
Number of Stories Above Grade	Three-story
Basement or Subgrade Areas	No
Total Building Square Footage	275,000 SF
Year of Construction	1975
Additional On-site Development	Additional improvements include a single-story leasing office/clubhouse w/ swimming pool
Current Commercial Tenants	N/A

### 2.2 Subject Property Services and Utilities

The following municipal services and utilities are provided to the subject property and/or the surrounding area.

IDENTIFIER	DESCRIPTION OF IDENTIFIED ITEM
Potable Water Supply	City Water
Sewage Disposal System	Municipal Sewer
Storm Water	Municipal Storm Water
Electricity	County Electric
Natural Gas	Natural Gas Provider
Heating/Cooling Systems	Heating, ventilation and air conditioning (HVAC) are provided by natural gas and electric split systems.

### Date of Utility Connection

Municipal water and sewer services were reportedly available at the time the Subject Property was constructed.

### 2.3 Adjacent Property Information

During the site reconnaissance, CREtelligent observed the following land use on properties in the immediate vicinity of the Subject Property.

ADDRESS	CURRENT USE	CURRENT OCCUPANT(S)
<b>NORTH</b>		
100 East 2nd Avenue	Commercial	Multi-tenant retail property under development.
200 East 2nd Avenue	Gas Station	A BP-branded gas station and convenience store.
<b>EAST</b>		
413 Brentwood Street	Office	A two-story multi-tenant building used for general office space. Tenants include a dentist office, a law office, an insurance company, and two technology companies.
N/A	Vacant Land	N/A

ADDRESS	CURRENT USE	CURRENT OCCUPANT(S)
<b>SOUTH</b>		
400 East 3rd Avenue	Residential	Single-family residence
404 East 3rd Avenue	Residential	Single-family residence
<b>WEST</b>		
450 Palmer Road	Residential	Single-family residence

## 2.4 Physical Settings

The following section provides a brief summary of the physical settings associated with the Subject Property and general site vicinity. These settings include information on elevation, the topographic slope of the general site vicinity, a description of general soil type, nearest surface water body, and estimated depth and flow direction of groundwater where known.

<b>PHYSICAL SETTINGS</b>	
<b>TOPOGRAPHY</b>	
Elevation	30 feet above mean sea level (MSL)
Topographic Quad	Fredericksburg Quadrangle
General Slope	The Subject Property is relatively flat, with a slight gradient to the northeast.
<b>HYDROLOGY</b>	
Nearest Surface Water Body	There are no surface water bodies on or bordering the Subject Property.
Estimated Depth to Groundwater	20 feet bgs Source: Estimated by local topography
Estimated Groundwater Flow Direction	Northeast

PHYSICAL SETTINGS	
GEOLOGIC INFORMATION	
Geology	Antlers Sand or Antlers Sandstone (Ka) Early Cretaceous aged sandstone approximately 200 to 700 feet thick. Source: USGS Geologic Map State.
SOIL	
Soil Name	The soils in the vicinity of the Property are classified as Urban Land. The Urban Land designation indicates that more than 85 percent of the original soils have been disturbed or covered by paved surfaces, buildings or other structures. Because of the variability of the soil material, onsite investigation would be required to determine the specific soil composition at the Property. Source: USDA Web Soil Survey, Natural Resources Conservation Service Soil Survey, and Geographic Database (SSURGO) included in the ERIS Physical Setting Report.
WELLS, PIPELINES, AND MINERALS EXPLORATION	
Oil and Gas Wells	No oil or gas wells or associated production equipment were observed at the Subject Property. No wells were depicted on the USGS Topographic Map. According to the identify source, there are no oil or gas wells on the Subject Property.
Pipelines	No petroleum pipelines were observed on or adjacent to the Subject Property. No pipelines were depicted on the USGS Topographic Map. According to the identify source, there are no pipelines on the Subject Property.
Mining	No mining activities were observed on or in the vicinity of the Subject Property. No mining activities were depicted on the USGS Topographic Map.

### 3.0 HISTORICAL RECORDS REVIEW

To establish the history of the Subject Property and adjacent properties, CREtelligent ordered, reviewed, and interpreted multiple historical resources. These historical resources were provided by CREtelligent's proprietary database and/or third-party sources. These historical resources include but are not limited to the following: aerial photography; sanborn/fire insurance maps; topographic maps; and city directories (where available). CREtelligent reviewed the following historical documents:

#### 3.1 Historical Aerial Photographs

Aerial photographs, which are of a sufficient resolution to allow identification of development and activities of areas encompassing the subject property, can be used in documenting the historical usage of a property. CREtelligent reviewed the following aerial photographs as provided by ERIS, which are included in the [Appendices - Historical Resources](#).

YEAR RANGE	DESCRIPTION
1938-1973	The Subject Property is primarily undeveloped land, with the exception of two small residential structures on the northern portion of the property. Adjoining properties include several small retail businesses to the north, and vacant land with scattered residential development to the east, south and west.
1976-1985	The Subject Property is shown to be improved with the current multifamily structures. Adjoining properties include several small retail businesses to the north, and vacant land with scattered residential development to the east, south and west.
1989-Present	No significant changes to the Subject Property are shown since the previous aerials photographs reviewed. Commercial development is more prevalent on the adjacent properties including the existing gasoline filling station to the north and office development to the east.

#### 3.2 Sanborn Fire Insurance Maps

CREtelligent attempted to obtain Sanborn Fire Insurance Maps covering the Subject Property and surrounding area. No historical Sanborn maps were identified. The "no coverage" notification is included in [Appendix - Historical Resources](#).

### 3.3 Historical City Directories

Local city directories identify the name of the individual or company located at a given address. CREtelligent ordered a local street directory search from ERIS, which is included in the [Appendices - Historical Resources](#). The following local city directories were reviewed:

YEAR RANGE	SUBJECT PROPERTY - OCCUPANTS LISTED	ADJACENT - OCCUPANTS LISTED
1941-1970	No listings were identified for the current and/or former addresses of the Subject Property in this year range.	No listings were identified for the current and/or former addresses of the adjoining properties in this year range.
1975-1985	The existing Garden Apartments were identified in the directories for this year range.	Residential listings were identified for properties surrounding the Subject Property.
1990-2022	The existing Garden Apartments were identified in the directories for this year range.	North - BP Gas Station (200 East 2nd Avenue) East - Multi-tenant professional office building (413 Brentwood Street) South - Residential development West - Residential development

### 3.4 Historical Topographic Maps

Historical topographic maps can indicate whether an area is undeveloped, lightly developed or heavily developed. They can also indicate if roads, railroad tracks, quarrying operations or water bodies were previously or near a property. CREtelligent reviewed the following topographic maps, relevant portions of which are included in [Appendix - Historical Resources](#).

YEAR RANGE	DESCRIPTION
1941-1969	The Subject Property appears to be primarily undeveloped, with the exception of two small residential structures along the northern portion of the site. Adjoining properties are primarily undeveloped land with scattered residential development. The remainder of the surrounding area is undeveloped.
1969-2022	The Subject Property is shown to be improved with the current multifamily structures. Adjoining properties include several small retail businesses to the north, and vacant land with scattered residential development to the east, south and west.

### 3.5 Historical Use Summary

A summary of historical review for the Subject Property is provided below:

The Subject Property was primarily undeveloped land, with two small residential structures along the northern portion of the Subject Property until the prior residences were razed in preparation for construction of the existing multifamily developments in 1975.

No prior usage of the Subject Property was identified that would be considered a REC.

A summary of our historical review for the adjacent properties is provided below:

The northern, southern, eastern, western adjacent property was initially developed for residential use sometime between 1938 and 1941. The existing BP Gas Station (200 East 2nd Avenue) to the north was reportedly constructed in 1989. The existing multi-tenant professional office building (413 Brentwood Street) to the east was reportedly constructed in 1990.

No prior usage of the adjacent properties was identified that would be considered a REC for the Subject Property. Please refer to [Section 4.2](#) for further discussion regarding the regulatory listings associated with the adjoining BP Gas Station.

Please see [Appendix - Historical Resources](#) to review these resources in their entirety.



#### 4.0 ENVIRONMENTAL RECORDS REVIEW

CREtelligent reviewed regulatory database records provided by a third-party vendor (Appendix [Regulatory Database Record Report](#)). Results specific to the Subject Property are presented in Section 4.1.1 Subject Property Regulatory Database Review while the results specific to off-site properties are presented in Section 4.1.2 Off-Site Regulatory Database Review.

For the purposes of this assessment, the potential for vapor migration that may represent a REC to the Subject Property was evaluated by the environmental professional using a limited screening method based on the type of contaminant, location of contaminant (or release) with relation to the subject property, documented extent of chemicals in subsurface, and groundwater flow direction. In addition, screening tools created by regulatory agencies (EPA and various state agencies) may be used to evaluate the significance of a release with respect to the vapor migration and/or vapor intrusion potential concerns. This screening approach is not to be confused with a human health risk assessment, but rather a conservative approach at assessing if a possible risk exists.

#### 4.1 Subject Property Regulatory Database Review

The results of the regulatory database search were reviewed by the environmental professional specific to the Subject Property as well as "orphan or non-plottable" sites which may contain findings specific to the Subject Property. If warranted, additional review of available regulatory files, on-line information, and/or client provided information is additionally presented to provide an environmental professional opinion on the potential environmental risk associated with the identified regulatory finding. The following records were identified on the Subject Property.

DATABASE	SITE NAME	ADDRESS
Spills	"Department of Public Works" (BRDPW)	N/A
<p>The SPILLS listings stated that raw sewage was released from a manhole on the Subject Property in January 2015, and raw sewage was released along the side of an apartment building in February 2017. In 2015, the BRDPW reported a stoppage in the city's main collection line that was repaired. The Public Works cleaned the sewage release in the manhole and the incident was closed. The 2017 release was also addressed by the Public Works, cleaned, and the incident closed. Given the nature of the reported spill incidents and the regulatory status, these listings are not considered a REC.</p>		

#### 4.2 Off-Site Regulatory Database Review

CREtelligent has reviewed the findings of the ASTM regulatory database search. This information was screened for potential environmental relevance. Sites/listings of greatest significant are discussed in the table below.

Properties identified in the regulatory database search but not discussed in further detail were not identified as an increased environmental risk to the Subject Property for one or more of the following reasons:

- a) Site(s) only hold an operating permit with no documented violations and/or releases;
- b) Site(s) have been granted “No Further Action” by applicable regulatory agency and/or Corrective Action is on-going under the guidance of applicable regulatory agency and/or subject property was not identified as a responsible party, contributor, or off-site impact;
- c) Site(s) had no documentation indicating they impacted the Subject Property's soil, groundwater, and/or vapor media;
- d) Site(s) distance and/or topographic position relative to the subject property reduces the level of potential risk associated with the site(s), and/or
- e) RCRA TSD facilities reviewed and identified to NOT be hazardous waste generators.

The following records of greatest significance were identified on adjacent and/or surrounding properties:

DATABASE	SITE NAME	ADDRESS	DIST. (FT) / DIR.	ELEV. DIFF. (FT)	RISK
UST/LUST	BP Filling Station	(XXXXX East 2nd Avenue)	Adjacent/North	5	
<p>This facility currently maintains three 10,000-gallon gasoline USTs that were reportedly installed in 1989. According to the review of regulatory files associated with this site, UST compliance inspections conducted in 2015, 2016, 2016, 2018, and 2022 citing many UST system maintenance violations including equipment failure, failure to maintain secondary containment, failure to operate UST system to prevent spills and/or overfills, and failure to maintain under-dispenser containment in good condition; the generation of non-halogenated hazardous waste from 2001 through 2023, and as a closed LUST case site.</p> <p>This site is listed on the LUST database due to a release discovered in November 1996. A site assessment was conducted at that time and remediation commenced in January 1997. The leak was determined to be from the product piping which was reportedly removed and replaced with new fiberglass piping. During removal, soil excavation was conducted and soil samples were obtained. Soil samples collected from the over-excavation, confirmed contaminated soil had been successfully removed. Excavated soil was successfully bioremediated at the site and used as backfill. The regulatory agency issued a site closure letter in January 1998.</p> <p>Another LUST case was opened in September 2013 and was subsequently closed in March 2014. On September 11, 2013, soil samples were obtained as part of a due diligence investigation. Analytical results identified concentrations up to 1,190 ppm TPHd under one of the tanks and 880 ppm under the dispenser. A total of 12 soil samples were collected below the UST/dispenser/piping area (Soil Samples #1- #12). Soil sample concentrations at the dispenser were identified to be 370 ppm and 880 ppm TPHd at two and six feet, respectively, and samples under the tank were 1,190 ppm at 2 feet and 124 ppm TPHd at 6 feet below the UST. All other soil samples collected were non-detect (ND) for BTEX, MTBE, ETBE, DIPE, TAME, and TBA.</p>					

DATABASE	SITE NAME	ADDRESS	DIST. (FT) / DIR.	ELEV. DIFF. (FT)	RISK
<p>In October 2013, three soil borings (B-1, B-2, B-3) were advanced in the area of the former dispenser area (B-1) and two in the vicinity of the fill end of the tank (B-2, B-3) to depths between 20 and 30 feet (ft) below grade (bg). Soil samples were analyzed for diesel-range hydrocarbons (C11-C22) using EPA Method 8015B and volatile organic compounds and oxygenates using EPA method 8260B. All samples were non-detect (ND) for all constituents tested. The stockpiled soil removed and was also characterized and 12.1 ppm TPHd was detected in stockpile sample S#6. Groundwater was not encountered during the drilling to the maximum depth explored (30 ft bg).</p> <p>The three soil borings were advanced in October 2013 and subsurface conditions in the former UST area were found to contain minimal subsurface hydrocarbon concentrations remaining in situ. The consultant indicated further delineation or assessment of soil conditions was not warranted. Based on the data, it was concluded that TPHd detected in soil samples was limited, and further assessment and/or remediation was not warranted. Remediation was not conducted at this second location. A case closure letter was issued on March 7, 2014.</p> <p>Based on the prior investigations conducted, the presumed groundwater flow direction (northeast), the intervening distance of the tank hold to the boundaries of the Subject Property (over 200 feet) and the lack of current release incidents or ongoing remediation/cleanup, this site is not considered a REC to the Subject Property.</p>					

### 4.3 State Environmental Superliens

CREtelligent searched the NETR Online Environmental Lien and AUL State Statutes website to determine if State has an environmental superlien which would allow environmental authorities the right to place a first priority lien on the Subject Property.

The Subject Property is not located in a State that has a statute imposing a super priority lien for clean up of hazardous waste.

## 5.0 INTERVIEWS & USER PROVIDED INFORMATION

According to ASTM E1527-21 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), certain items should be researched by the prospective landowner or grantee, and the results of such inquiries provided to the Environmental Professional preparing the ESA for his/her consideration.

The table below outlines information that CREtelligent requested in our effort to identify or alleviate possible RECs in connection with the Subject Property. Information provided by the User (if any) is summarized below the table.

USER PROVIDED INFORMATION	NOT PROVIDED BY USER	PROVIDED BY USER
User Questionnaire		✓
Title Records	✓	
Environmental Cleanup Liens or AULs		✓
Specialized Knowledge		✓
Valuation Reduction for Environmental Issues		✓
Prior Environmental Reports	✓	
Other	✓	

- No information was provided at the time of the report
- The user questionnaire was completed by the current owner of the Subject Property, dated October 23, 2023.
- The Subject Property was identified as a Multifamily. No change of property use is anticipated at this time.
- User indicated the reason for conducting the Phase I ESA was to assist in the underwriting of a proposed mortgage loan backed by the Subject Property.

### 5.1 Interviews

Interviews were conducted with various individuals knowledgeable of the subject property. The interviews were conducted to determine an awareness of any recognized environmentally-related problems or concerns at the subject property. Specific information obtained from the noted individuals appears in the appropriate sections of this report.

The information gained from the interviews conducted by CREtelligent for this ESA were obtained from sources considered reliable and believed to be true and correct. However, CREtelligent has made no independent investigation as to such matters and undertakes no responsibility for the accuracy of these items.

TITLE	COMMENTS
Seller Questionnaire	Returned to CREtelligent on October 23, 2023. No environmental concerns were noted based on the information included in the returned questionnaire.
Owner	At the time of the ESA, the owner not available for interview.
Current Site Manager, Occupants, or Employees	At the time of this investigation, the property manager was available for interview. The property manager has been associated with the property for five years. No environmental concerns were identified during the interview.
Past Site Manager, Occupants, or Employees	At the time of the ESA, past site manager, occupants, or employees were not available for interview.
State/Local Agency	Interviews with State/Local agencies were summarized in <a href="#">Section 3.5</a> .
Other	At the time of the ESA, other individuals were not available for interview.

### 5.2 Summary of Previous Investigations

No copies of previous investigations or other environmentally-related information about the Subject Property was provided by the Client.

Please see [Appendix - Client Provided Information](#).

### 5.3 Agency Records Review

The purpose of the additional regulatory agency file review is to obtain sufficient information to assist CREtelligent personnel in determining if a REC, HREC, CREC, BER, or a De Minimis condition exists at the Subject Property in connection with the identified database listings. Pertinent regulatory files and/or records received by the date of this report have been added into [4.0 Environmental Records Review](#). The following additional environmental records were reviewed to supplement the standard environmental record database search.

**Local Agencies**

DATE REQUESTED	RESOURCE	COMMENTS
10/23/23	City	A response was received and no records were on file for the subject property.
10/23/23	City Permit Department	Files were available for the subject property. See Appendix Regulatory Agency Records.
10/24/23	County	Files were available for the subject property. See Appendix Regulatory Agency Records.
10/23/23	Fire Department	Files were available for the subject property. See Appendix Regulatory Agency Records.

Please see Appendix-[Regulatory Agency Records](#).

## 6.0 FIELD RECONNAISSANCE

A visual review of the Subject Property was completed to document site conditions and identify recognized environmental conditions. The reconnaissance was completed on October 24, 2023.

The site reconnaissance included a systematic evaluation of the property exterior was conducted in a manner consistent with the ASTM standard. Property interior was comprehensively assessed with exception of the items in the table below. Photographs are provided in the [Subject Property Photographs](#) of this report.

### 6.1 Subject Property Observations & Limitations

The following lists the areas of the subject property that were or were not accessible during our site visit.

Site Escort:	Property Manager
What locations on the Subject Property <b>WERE NOT</b> observed/inspected to evaluate the environmental condition of the Subject Property? (not accessible)	All locations on the subject property were made accessible to the site inspector, including 25% of the resident units.
Were there any discrepancies noted in property boundary? Different from the image provided?	No discrepancies were noted in the property boundaries.
Were adjacent properties observed from the Subject Property premises? Were any items of environmental concern identified?	All adjacent properties were observed from the subject property premises, and no items of environmental concern were identified.
Limiting conditions to the site visit:	None
If yes, please describe:	N/A

### Units Inspected

A representative sample of residential units were accessed and observed by CREtelligent, including the following:

	UNITS OBSERVED	
Building 1/Unit 2	Building 1/Unit 3	Building 1/Unit 5
Building 1/Unit 8	Building 1/Unit 11	Building 1/Unit 12
Building 1/Unit 15	Building 2/Unit 5	Building 2/Unit 6

	UNITS OBSERVED	
Building 2/Unit 8	Building 2/Unit 9	Building 2/Unit 14
Building 3/Unit 5	Building 3/Unit 6	Building 3/Unit 10
Building 3/Unit 11	Building 3/Unit 15	Building 4/Unit 3
Building 4/Unit 6	Building 4/Unit 8	Building 4/Unit 12
Building 5/Unit 3	Building 5/Unit 7	Building 5/Unit 10
Building 5/Unit 15	Building 6/Unit 3	Building 6/Unit 4
Building 6/Unit 8	Building 6/Unit 11	Building 6/Unit 12
Building 6/Unit 14		

## 6.2 Observations Checklist

The following are the observations that were collected specifically to the ASTM inspection criteria for "*Interior and Exterior Observations*".

ASTM OBSERVATIONS	OBSERVED	RISK
Hazardous Substances and Petroleum Products in Connection with Current Business Type	Yes	
Hazardous Substance and Petroleum Product Containers Not in Connection with Current Business Type	No	
Storage Tanks (UST/ASTs)	Yes	
Strong, Pungent, or Noxious Odors	No	
Standing Surface Water and Pools or Sumps Containing Liquids Likely to be Hazardous Substances or Petroleum Products	No	
Drums, Totes, and Intermediate Bulk Containers	No	
Unidentified Substance Containers	No	



ASTM OBSERVATIONS	OBSERVED	RISK
PCB Containing Items	Yes	
Heating/Cooling	Yes	
Stains or Corrosion on Floors, Walls, or Ceilings (Interior)	No	
Stained Soil or Pavement (Exterior)	No	
Drains, Sumps, and Wastewater	No	
Pits, Ponds, or Lagoons	No	
Stressed Vegetation (other than insufficient water)	No	
Solid Waste (e.g., construction debris, demolition debris, or other solid waste disposal, or mounds or depressions suggesting trash or other solid waste disposal) Not trash dumpsters	No	
Wells (e.g. dry wells, irrigation wells, injection wells, abandoned wells, or other wells)	No	
Septic Systems (on-site septic systems or cesspools)	No	

### Observations Summary

ASTM OBSERVATIONS	COMMENTS
Hazardous Substances and Petroleum Products in Connection with Current Business Type	Limited amounts of cleaning supplies, paints, pool chemicals, and other chemicals used as part of general maintenance at the property/complex are present. These products are used in small quantities and the storage conditions appeared satisfactory.
Storage Tanks (USTs/ASTs)	CREtelligent noted the presence of two underground propane tanks. The tanks are located to the north of the office/clubhouse and are used to fuel the dryers in the laundry facility. At normal temperatures and pressure, propane is a gas and, therefore a release would not impact soils or groundwater. While the propane tanks could be considered a fire or safety concern, the presence of this type of tank is not considered to represent a REC.

ASTM OBSERVATIONS	COMMENTS
PCB Containing Items	<p>Numerous pad-mounted electrical distribution transformers are located on the Subject Property. At the time of CREtelligent's site reconnaissance, the transformers were observed to be in good condition with no signs of leaks or staining. Based on the pre-1979 date of construction of the property improvements, it is possible that PCB-containing electrical equipment is present. Based on correspondence with the County Electric customer service department, the electrical equipment is owned by the local utility company, which maintains operational responsibility for the equipment and any associated issues. County Electric was not able to confirm the presence or absence of PCBs; however, in accordance with Freddie Mac guidelines, based on confirmed ownership and operational responsibility of the transformers by County Electric, no further action is required at this time.</p>
Heating/Cooling	<p>The heating, ventilation and air conditioning (HVAC) systems are electric, packaged systems including individual tenant unit exterior ground-mounted condensers and interior air handler closets. No evidence of past or present heating oil usage was identified</p>
<p><i>Please see Appendix-<a href="#">Subject Property Photographs</a> for additional perspective.</i></p>	

## 7.0 ASTM NON-SCOPE CONSIDERATIONS

The ASTM Standard recognizes that there may be environmental issues or conditions at a property that parties may wish to consider. These are considered ASTM Non-Scope Considerations. The scope of services for this assessment included the following:

### 7.1 Asbestos Containing Material

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be presumed to contain asbestos, for purposes of this regulation. Construction materials including, but not limited to, thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building and that have not been appropriately tested may be considered “presumed asbestos-containing material” (PACM).

Local, State, and Federal regulations indicate that any building material, regardless of age, should be presumed to contain greater than 1% Asbestos Containing Material (ACM). As a result, it is always advisable to conduct an asbestos survey prior to the disturbance of building materials to confirm the presence or absence of ACMs at a property.

In accordance with the Freddie Mac Multi-Family Seller/Service Guide-Environmental Reporting Requirements, CREtelligent collected 12 samples of on-site friable building materials (popcorn ceiling texture). The non-friable materials observed, which included resilient flooring material, flooring mastic, drywall, joint compound, and roofing materials, were in good condition.

The friable materials sampled and analytical results are presented below:

MATERIAL	LOCATION (BUILDING/UNIT)	RESULT
Popcorn Ceiling Texture	Building 1/Unit 2	3.0% Chrysotile
Popcorn Ceiling Texture	Building 1/Unit 3	2.5% Chrysotile
Popcorn Ceiling Texture	Building 2/Unit 5	1.0% Chrysotile
Popcorn Ceiling Texture	Building 2/Unit 9	3.0% Chrysotile
Popcorn Ceiling Texture	Building 3/Unit 3	3.0% Chrysotile
Popcorn Ceiling Texture	Building 3/Unit 11	4.0% Chrysotile
Popcorn Ceiling Texture	Building 4/Unit 4	2.0% Chrysotile

MATERIAL	LOCATION (BUILDING/UNIT)	RESULT
Popcorn Ceiling Texture	Building 4/Unit 7	3.0% Chrysotile
Popcorn Ceiling Texture	Building 5/Unit 8	3.0% Chrysotile
Popcorn Ceiling Texture	Building 5/Unit 14	2.0% Chrysotile
Popcorn Ceiling Texture	Building 6/Unit 5	2.0% Chrysotile
Popcorn Ceiling Texture	Building 6/Unit 12	4.0% Chrysotile

Based on the results of the limited asbestos sampling, asbestos was identified in the popcorn ceiling finishes throughout the Subject Property. This material was observed to be in good condition and encapsulated under several layers of fresh paint. Based on the observed condition, the potential for fiber release is low.

A copy of the laboratory report is included in the [appendices](#).

## 7.2 Radon

Radon is an odorless, colorless, tasteless radioactive gas that occurs from the natural breakdown (radioactive decay) of radium, uranium and thorium. The United States Environmental Protection Agency (EPA) has specified a Radon action level of 4.0 picocuries per liter of air (pCi/L). The health risk associated with radon is its potential rate of accumulation within confined areas, particularly confined areas near or in the ground, such as basements, where vapors can readily transfer to indoor air from the ground through foundation cracks or other pathways. Indoor gas levels depend primarily on the underlying geological formations and building construction characteristics. Large, adequately ventilated rooms generally present limited risk for radon exposure.

In accordance with the 2023 Enterprise Multifamily Radon Policy, short-term radon testing was completed within 25% of ground contact residential units, with no less than one unit per building.

The on-site radon measurement activities were conducted by (radon professional), a radon measurement professional credentialed by the National Radon Proficiency Program (NRPP) and licensed by the State of (Site State), between October 24, 2023 and October 27, 2023. A total of 25 passive charcoal adsorption measurement devices were deployed within 25 ground contact residential units within 12 buildings.

LOCATION (BUILDING/UNIT)	RADON CONCENTRATION (PCI/L)
Building 1/Unit 2	1.2 pCi/L
Building 1/Unit 4	1.1 pCi/L

LOCATION (BUILDING/UNIT)	RADON CONCENTRATION (PCI/L)
Building 1/Unit 5	2.0 pCi/L
Building 1/Unit 8	3.4 pCi/L
Building 1/Unit 10	<b>4.2 pCi/L</b>
Building 2/Unit 3	3.5 pCi/L
Building 2/Unit 6	<b>6.0 pCi/L</b>
Building 2/Unit 7	2.8 pCi/L
Building 2/Unit 9	1.5 pCi/L
Building 3/Unit 1	2.5 pCi/L
Building 3/Unit 4	3.2 pCi/L
Building 3/Unit 5	<b>5.2 pCi/L</b>
Building 3/Unit 9	<b>4.1 pCi/L</b>
Building 4/Unit 1	2.6 pCi/L
Building 4/Unit 3	3.2 pCi/L
Building 4/Unit 6	1.2 pCi/L
Building 4/Unit 8	1.2 pCi/L
Building 5/Unit 4	2.1 pCi/L
Building 5/Unit 5	<b>5.3 pCi/L</b>
Building 5/Unit 6	3.4 pCi/L
Building 5/Unit 9	<b>4.0 pCi/L</b>
Building 6/Unit 4	1.2 pCi/L
Building 6/Unit 7	1.3 pCi/L

LOCATION (BUILDING/UNIT)	RADON CONCENTRATION (PCI/L)
Building 6/Unit 8	1.8 pCi/L
Building 6/Unit 9	2.0 pCi/L

According to the analytical results, six of the units tested were determined to have radon concentrations that meet or exceed the EPA action level of 4.0 pCi/L.

A copy of the radon laboratory report is included in the [appendices](#).

### 7.3 Lead Based Paint

Lead is a highly toxic metal that affects human health. Lead-Based Paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm<sup>2</sup> (or 5,000 ug/g or 0.5% by weight) or more of lead. Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as “Title X”, to protect families from exposure to lead from paint, dust, and soil. Under Section 1017 of Title X, intact LBP on most walls and ceilings is not considered a “hazard,” although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated. Further, Section 1018 of this law directed the Housing and Urban Development (HUD) and the US EPA to require the disclosure of known information on LBP and LBP hazards before the sale or lease of most housing built before 1978.

Due to the age of the Subject Property, constructed in 1975, there is a potential that LBP is present. All observed painted surfaces were in good condition and are not expected to pose a health and safety concern to the occupants of the Subject Property at this time.

### 7.4 Mold

Molds are microscopic organisms found virtually everywhere, indoors and outdoors. Mold will grow and multiply under the right conditions, needing only sufficient moisture (e.g. in the form of very high humidity, condensation, or water from a leaking pipe, etc.) and organic material (e.g., ceiling tile, drywall, paper, or natural fiber carpet padding).

CREtelligent observed interior areas of the Subject Property building in order to identify the significant presence of mold. CREtelligent did not note obvious visual or olfactory indications of the presence of mold, nor did CREtelligent observe obvious indications of significant water damage.

No sampling of suspect surfaces was conducted as part of this assessment and no additional action with respect to mold appears to be warranted at this time. This visual survey was not designed to discover all areas which may be affected by mold growth on the subject property. Rather, it is intended to give the Client an indication if significant

(based on observed areas) mold growth is present at the subject property. Additional areas of mold not observed as part of this limited assessment, possibly in pipe chases, HVAC systems, and behind enclosed walls and ceilings, may be present on the Subject Property.

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## 8.0 ABOUT THIS ENVIRONMENTAL SITE ASSESSMENT REPORT

On Date of Engagement, Client Name retained CREtelligent to conduct a Phase I Environmental Site Assessment of the property at Property Address, City, State, Zip (herein, the “subject property”). This assessment was performed in general conformance with ASTM E1527-21, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process,” following all prescribed methodologies and protocols detailed in this Practice.

Any environmental Site Assessment that meets or exceeds the above-described methods is presumed valid under all applicable standards. Any exceptions to, or deletions from, this Practice are described in this report.

This report is valid for 180 days beginning Report Date.

### 8.1 Purpose

This Phase I ESA is intended to assist the user in identifying Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), Historical Recognized Environmental Conditions (HRECs), de minimis conditions, and Business Environmental Risks (BERs) as defined by ASTM E1527-21.

A REC, as defined in ASTM E1527-21, is “(1) the presence of *hazardous substances* or *petroleum products* in, on, or at the *subject property* due to a *release* to the *environment*; (2) the likely presence of *hazardous substances* or *petroleum products* in, on, or at the *subject property* due to a *release* or *likely release* to the *environment*; or (3) the presence of *hazardous substances* or *petroleum products* in, on, or at the *subject property* under conditions that pose a *material threat* of a future *release* to the *environment*.”

A CREC, as defined in ASTM E1527-21, is “a recognized environmental condition affecting the *subject property* that has been addressed to the satisfaction of the applicable regulatory authority or authorities with *hazardous substances* or *petroleum products* allowed to remain in place subject to implementation of required controls (for example, *activity and use limitations* or other *property use limitations*).”

A HREC, as defined in ASTM E1527-21, is “a previous *release* of *hazardous substances* or *petroleum products* affecting the *subject property* that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the *subject property* to any controls (for example, *activity and use limitations* or other *property use limitations*). A *historical recognized environmental condition* is not a *recognized environmental condition*.”

A de minimis condition, as defined in ASTM E1527-21, is “a condition related to a *release* that generally does not present a threat to human health or the *environment* and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. A condition determined to be a *de minimis condition* is not considered a *recognized environmental condition (REC)* nor a *controlled recognized environmental condition (CREC)*.”



A BER, as defined by ASTM E1527-21, is a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice.

## 8.2 Scope of Work

In accordance with ASTM Practice E1527-21, CREtelligent's assessment activities included: 1) a review of available historical resources (e.g. historical aerial photographs, city directories, and fire insurance maps; 2) a review Federal, State, County, and Local regulatory agency records; 3) a review of a regulatory database report provided by a third-party vendor; 4) onsite reconnaissance of the subject property and adjacent/adjoining properties; and 5) interviews, when reasonably possible, with onsite personnel and the subject property owner(s).

During the site visit, a CREtelligent representative conducted site reconnaissance to assess the possible presence of petroleum products and/or other hazardous materials on the subject property and made every reasonable effort to interview site personnel about current and past subject property use.

## 8.3 Report Reliance

This report is for the use and benefit of, and may be relied upon by

- a. the Seller/Servicer, Freddie Mac and any successors and assigns ("Lender");
- b. independent auditors, accountants, attorneys and other professionals acting on behalf of Lender;
- c. governmental agencies having regulatory authority over Lender;
- d. designated persons pursuant to an order or legal process of any court or governmental agency;
- e. prospective purchasers of the Mortgage; and
- f. with respect to any debt (or portion thereof) and/or securities secured, directly or indirectly, by the Property which is the subject of this report, the following parties and their respective successors and assigns:
  - any placement agent or broker/dealer and any of their respective affiliates, agents and advisors;
  - any initial purchaser or subsequent holder of such debt and/or securities;
  - any Servicer or other agent acting on behalf of the holders of such debt and/or securities;
  - any indenture trustee;
  - any rating agency; and
  - any institutional provider from time to time of any liquidity facility or credit support for such financings.

In addition, this report, or a reference to this report, may be included or quoted in any offering circular, information circular, offering memorandum, registration statement, private placement memorandum, prospectus or sales brochure (in either electronic or hard copy format) in connection with a securitization or transaction involving such debt (or portion thereof) and/or securities.

### 8.4 Significant Assumptions

While compiling this report, CREtelligent has assumed the veracity of sources of information widely considered within the industry to be authoritative, true, and correct. Nevertheless, CREtelligent has conducted no independent survey of the subject property nor made any independent investigation verifying the veracity of its sources. CREtelligent assumes no responsibility for the accuracy of these sources. All descriptions of dimensions, capacities, quantities, distances, historical site use, and ownership history information gathered from these sources are provided to assist the Client in visualizing the property and evaluating its likely exposure to environmental risk.

Further, it is assumed that all environmental site assessments contain data gaps. Data gaps that may be filled in by reasonable inference or that are unlikely to have a material effect on the environmental health of a property are considered insignificant and have been identified as such throughout this report. Significant data gaps, such as the current disposition of an environmental cleanup action or the number of hazardous materials used, stored, and/or hazardous waste generated on the subject property, are also identified and discussed. Significant data gaps may result in a recommendation for further assessment.

### 8.5 Data Gaps

A data gap is defined as the “lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information.”

CREtelligent encountered the following data gaps during this assessment:

SECTION	SOURCES CONSULTED	DETAILS	SIGNIFICANCE
<b>HISTORICAL</b>			
<a href="#">3.0</a>	Aerial photographs, Sanborn maps, city directories, topographic map, municipal records, and site contact.	History not conducted back to a time when the site was undeveloped land.	LOW - Not anticipated to be significant, based on information reviewed to date.

SECTION	SOURCES CONSULTED	DETAILS	SIGNIFICANCE
<b>INTERVIEWS</b>			
<a href="#">5.0</a>	Current owners and municipal records.	Historical owners could not be identified.	LOW - Not anticipated to be significant, based on information reviewed to date.

### 8.6 Limitations

CREtelligent warrants that the findings and conclusions contained herein were accomplished in accordance with the methodologies set forth in ASTM Practice E1527-21 at “Scope of Work.” These methodologies are described as representing good commercial and customary practice for conducting an ESA of a property for the purpose of identifying recognized environmental conditions. However, even with the proper application of these methodologies, conditions may exist on the subject property that could not be identified within the scope of the assessment or which were not reasonably identifiable from available information. Further, the conclusions and findings set forth in this report are strictly limited in time to the date of the evaluations. The conclusions presented in the report are based solely on the services described therein, and not on scientific tasks or procedures beyond the scope of agreed-upon services or the time and budgeting restraints imposed by the Client. CREtelligent makes no other warranty, either expressed or implied.

Some of the information provided in this report is based upon personal interviews, and research of available documents, records, and maps held by the appropriate government and private agencies. This report is therefore subject to the limitations of historical documentation, availability, and accuracy of pertinent records, and the personal recollections of those interviewed.

ASTM Practice E1527-21 does not address requirements of any state or local laws or of any federal laws other than the all-appropriate inquiry provisions of the landowner liability protections. Further, this report does not intend to address all possible safety concerns, if any, associated with the subject property. While CREtelligent may comment on such matters, this report may not be construed as or used to certify that conditions on the subject property do not pose safety or health risks to its occupants or their visitors.

### 8.7 Limiting Conditions

No ESA can wholly eliminate uncertainty about whether environmental concerns affect the subject property. This report, therefore, is intended to reduce rather than eliminate uncertainty.

The performance of this ESA does not, in and of itself, meet the eligibility requirements qualifying landowners for certain liability protections set forth in 40 Code of Federal Regulations (CFR), Part 312, and authorized under the CERCLA.

Conditions may exist which were not identified as a result of our site reconnaissance or review of available historical and regulatory resources which might otherwise impact our conclusions concerning the condition of the subject property. Any conditions discovered or revealed which were not identified during the completion of this assessment should be reported to CREtelligent upon discovery and may impact the conclusions and recommendations of this Report.

CREtelligent utilized limited information concerning regulatory compliance in the preparation of this ESA report; however, this report is not intended as a compliance audit and may not be assumed to be, relied upon, or otherwise utilized as evidence of regulatory compliance.

In addition, the findings and conclusions expressed in this report are subject to all the limitations inherent to the methodologies prescribed in ASTM Practice E1527-21. Specific limitations, such as the unavailability of owner contact information, responses to FOIA requests not made available within agreed-upon service deadlines, areas inaccessible to the CREtelligent inspector at the time of site reconnaissance, etc. are noted and their impact discussed in the appropriate sections of this report.

## 9.0 TERMS AND ACRONYMS

Terms and Acronyms	Description
Adjacent Property	Any real property or properties the border of which is contiguous or partially contiguous with that of the subject property, or that would be contiguous or partially contiguous with that of the property but for a street, road, or other public thoroughfare separating them.
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
AUL	Activity and Use Limitation
BER	A BER, as defined by ASTM E1527-21, is a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice.
BGS	Below Ground Surface
BTEX	Benzene, Toluene, Ethylbenzene, and Xylenes
CDL	Clandestine Drug Lab
CERCLIS	Comprehensive Environmental Response Compensation and Liability Information System
COC	Contaminant of Concern
CREC	A CREC, as defined in ASTM E1527-21, is “a recognized environmental condition affecting the <i>subject property</i> that has been addressed to the satisfaction of the applicable regulatory authority or authorities with <i>hazardous substances</i> or <i>petroleum products</i> allowed to remain in place subject to implementation of required controls (for example, <i>activity and use limitations</i> or other <i>property use limitations</i> ).”
Data Gap	A data gap, as defined in ASTM E1527-21, is the “lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information.”
De Minimis Condition	A de minimis condition, as defined in ASTM E1527-21, is a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be De Minimis conditions are not recognized environmental conditions nor controlled recognized environmental conditions.
ERNS	Emergency Response Notification System
FED ENG/FED INST	Federal Engineering Controls/Federal Institutional Controls
FOIA	Freedom of Information Act
FUDS	Formerly Used Defense Sites

HREC	A HREC, as defined in ASTM E1527-21, is “a previous <i>release of hazardous substances or petroleum products</i> affecting the <i>subject property</i> that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the <i>subject property</i> to any controls (for example, <i>activity and use limitations</i> or other <i>property use limitations</i> ). A <i>historical recognized environmental condition</i> is not a <i>recognized environmental condition</i> .”
ICIS	Integrated Compliance Information System
LST	Leaking Storage Tank
LPST/LUST	Leaking Petroleum Storage Tank   Leaking Underground Storage Tank
LUR	Land Use Restriction
MSL	Mean Sea Level
NFA/NFRA/NFRAP	No Further Action/No Further Remedial Action/No Further Remedial Action Planned
ND	None Detected
NOV	Notice of Violation
NPL	National Priorities List (aka Superfund)
PCB	Polychlorinated Biphenyls
PCE/PERC	Perchloroethylene, Tetrachloroethylene, Tetrachloroethene
PRP	Potentially Responsible Parties List
PST	Petroleum Storage Tank
RCRA	Resource Conservation and Recovery Act
RCRA CESQG	RCRA Conditionally Exempt Small Quantity Generator
RCRA CORRACTS	RCRA Corrective Action
RCRA LQG	RCRA Large Quantity Generators List
RCRA NON GEN	RCRA Non-Generator
RCRA SQG	RCRA Small Quantity Generators List
RCRA TSD	RCRA non-CORRACTS TSD Facilities
REC	A REC, as defined in ASTM E1527-21, is “(1) the presence of <i>hazardous substances or petroleum products</i> in, on, or at the <i>subject property</i> due to a <i>release to the environment</i> ; (2) the likely presence of <i>hazardous substances or petroleum products</i> in, on, or at the <i>subject property</i> due to a <i>release</i> or likely <i>release</i> to the <i>environment</i> ; or (3) the presence of <i>hazardous substances or petroleum products</i> in, on, or at the <i>subject property</i> under conditions that pose a <i>material threat</i> of a future <i>release</i> to the <i>environment</i> .”
SEMS	Superfund Enterprise Management System
SUPERFUND ROD	Superfund Record of Decision
SWF/LF	Solid Waste Facility/Landfill
TRIS	Toxic Release Inventory Program
UST	Underground Storage Tank
VCP	Voluntary Cleanup Program

VOC/HVOC	Volatile Organic Compound/Halogenated Volatile Organic Compound
USGS	United States Geological Survey

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# Freddie Mac Form 1103

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Section I: Summary

**Mortgage, Consultant and Property Information**

Freddie Mac loan number TBD	Report date October 31, 2023	Property name Garden Apartments
Seller/Service name TBD		Address 10 Main Street
Seller/Service number TBD	Inspection date October 24, 2023	City, State, Zip
Environmental consultant (firm name) CREtelligent	Number of units 275	Number of residential buildings 12
Address 11344 Coloma Road, #850	Number of ground floor units 100	Date of construction 1975
City, State, Zip Gold River, CA 95670	On-site contact (with title) Maintenance Supervisor	
Telephone number	On-site contact telephone number 866-941-6566	
Name of inspector Assessor		

**Environmental Report Results**

Check the applicable result for each hazard and provide costs where appropriate.

Environmental Issue	Acceptable	Indicate if O&M Program Required	Mitigation Cost	Additional Information Required	Section and Page Number(s)
Asbestos	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	
Hazardous materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
Storage tanks	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
Lead-based paint	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	
Drinking water	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
Polychlorinated biphenyls (PCBs)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
Prior use of property	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
Neighborhood waste sites	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
Mold	<input checked="" type="checkbox"/>	<input type="checkbox"/> MMP		<input type="checkbox"/>	
Radon	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	

Does the law of the Property Jurisdiction provide for an "environmental superlien?"  Yes  No

Section II: Private Wells and Attachments

Freddie Mac loan number TBD	Report date October 31, 2023	Property name Garden Apartments
Seller/Service name TBD		Address 10 Main Street
Seller/Service number TBD	Inspection date October 24, 2023	City, State, Zip

**Private Wells**

Are there private wells at the property used for drinking water?  Yes  No

**Attachments**

- Property inspection photographs:  Attached  Not attached
- Asbestos sample analysis:  Attached  Not attached  Not required
- Lead-based paint sample analysis:  Attached  Not attached  Not required

Explain below:

Painted surfaces were observed in good condition with no visible evidence of peeling or flaking.

- Radon test results:  Attached  Not attached
- Aerial photographs:  Attached  Not attached  Not available
- Sanborn maps:  Attached  Not attached  Not available

Other comments:

Section III: Unit Inspection and Certification

Freddie Mac loan number <b>TBD</b>	Report date <b>October 31, 2023</b>	Property name <b>Garden Apartments</b>
Seller/Service name <b>TBD</b>		Address <b>10 Main Street</b>
Seller/Service number <b>TBD</b>	Inspection date <b>October 24, 2023</b>	City, State, Zip

**Units Inspected**

List the units inspected below.

1	Building 1/Unit 2	2	Building 1/Unit 3	3	Building 1/Unit 5	4	Building 1/Unit 8
5	Building 1/Unit 11	6	Building 1/Unit 12	7	Building 1/Unit 15	8	Building 2/Unit 5
9	Building 2/Unit 6	10	Building 2/Unit 8	11	Building 2/Unit 9	12	Building 2/Unit 14
13	Building 3/Unit 5	14	Building 3/Unit 6	15	Building 3/Unit 10	16	Building 3/Unit 11
17	Building 3/Unit 15	18	Building 4/Unit 3	19	Building 4/Unit 6	20	Building 4/Unit 8
21	Building 4/Unit 12	22	Building 5/Unit 3	23	Building 5/Unit 7	24	Building 5/Unit 10
25	Building 5/Unit 15	26	Building 6/Unit 3	27	Building 6/Unit 4	28	Building 6/Unit 8
29	Building 6/Unit 11	30	Building 6/Unit 12	31	Building 6/Unit 14	32	

**Consultant's Certification**

On behalf of the environmental consultant, the undersigned hereby certifies that:

- The attached environmental report was prepared by the consultant in accordance with all applicable requirements in the Freddie Mac *Multifamily Seller/Service Guide*.
- The report was prepared in a manner consistent with generally accepted industry practices and standards.
- All information is true and correct, to the best of the undersigned's knowledge, and reflects the consultant's best professional opinion and judgment.
- No changes or additions have been made to the standard provisions of this form other than those expressly approved in writing by Freddie Mac.

Consulting firm name <b>CREtelligent</b>	Date <b>October 31, 2023</b>
Signature of authorized representative	Title
Name (typed or printed)	