

Appendix F

Phase 1 ESA



PARTNER

Engineering and Science, Inc.



PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

Row Townhomes

2323 West Broadway
Anaheim, California 92804

Report Date: September 2, 2020
Partner Project No. 20-289531.1



Prepared for:

Melia Homes

8951 Research Drive, Suite 100
Irvine, California 92618

September 28, 2020

Mr. Chad Brown
Melia Homes
8951 Research Drive, Suite 100
Irvine, California 92618

Subject: Phase I Environmental Site Assessment
Row Townhomes
2323 West Broadway
Anaheim, California 92804
Partner Project No. 20-289531.1

Dear Mr. Brown:

Partner Engineering and Science, Inc. (Partner) is pleased to provide the results of the *Phase I Environmental Site Assessment* (Phase I ESA) report of the abovementioned address (the "subject property"). This assessment was performed in conformance with the scope and limitations as detailed in the ASTM Practice E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

This assessment included a site reconnaissance as well as research and interviews with representatives of the public, property ownership, site manager, and regulatory agencies. An assessment was made, conclusions stated, and recommendations outlined.

We appreciate the opportunity to provide environmental services to you. If you have any questions concerning this report, or if we can assist you in any other matter, please contact me at (949) 481-9818.

Sincerely,



Robert Vaughn
National Client Manager

EXECUTIVE SUMMARY

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in accordance with the scope of work and limitations of ASTM Standard Practice E1527-13, the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) and set forth by Melia Homes for the property located at 2323 West Broadway in Anaheim, Orange County, California (the "subject property"). The Phase I Environmental Site Assessment is designed to provide Melia Homes with an assessment concerning environmental conditions (limited to those issues identified in the report) as they exist at the subject property.

Property Description

The subject property is located on the northern side of West Broadway and approximately 0.23-mile to the west of Brookhurst Street within a commercial and residential area of Orange County. Please refer to the table below for further description of the subject property:

Subject Property Data

Address:	2323 West Broadway, Anaheim, California
Property Use:	School, Vacant
Land Acreage (Ac):	6.5 Ac
Number of Buildings:	Five
Number of Floors:	One
Gross Building Area (SF):	Approximately 55,000 SF (Total)
Date of Construction:	1962-1963; applied additions in 1977 and 1980
Assessor's Parcel Number (APN):	127-051-43
Type of Construction:	Wood-Framed
Current Tenants:	Cornelia Connelly School
Site Assessment Performed By:	Brooke Hasty of Partner
Site Assessment Conducted On:	September 21, 2020

The subject property is currently a vacant school. No operations are conducted onsite. In addition to the current structures, the subject property is also improved with a small storage shed, an asphalt-paved parking area, basketball/tennis courts, graded grassland, concrete-paved walkways, pad-mounted transformers, and associated landscaping.

According to available historical sources, the subject property was formerly undeveloped as early as 1935; developed with an orchard between 1938 and 1953; developed with structures in 1963, 1977 and 1980. Tenants on the subject property have included Sisters of The Holy Child (1962-2004); Cornelia Connelly School (1962-Present).

The immediately surrounding properties consist of single-family residences to the north; a multi-family complex to the northeast; West Broadway beyond which are single-family residences to the south; a multi-family complex to the east; and single-family residences to the west.

According to information obtained from the California State Water Resources Control Board (SWRCB) GeoTracker database, of an investigation conducted on a northern vicinity property and topographic map

interpretation, groundwater in the vicinity of the subject property is inferred to be approximately 47 to 57 feet below ground surface (bgs) and flows toward the southwest.

Findings

A *recognized environmental condition (REC)* refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The following was identified during the course of this assessment:

- Partner did not identify evidence of RECs during the course of this assessment.

A *controlled recognized environmental condition (CREC)* refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. The following was identified during the course of this assessment:

- Partner did not identify evidence of CRECs during the course of this assessment.

A *historical recognized environmental condition (HREC)* refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The following was identified during the course of this assessment:

- Partner did not identify evidence of HRECs during the course of this assessment.

An *environmental issue* refers to environmental concerns identified by Partner, which do not qualify as RECs; however, warrant further discussion. The following was identified during the course of this assessment:

- There is a potential that asbestos-containing materials (ACMs) are present. Overall, all suspect ACMs were observed in good condition and do not pose a health and safety concern to the occupants of the subject property at this time. The identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants.

Conclusions, Opinions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of 2323 West Broadway in Anaheim, Orange County, California (the "subject property"). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report.

This assessment has revealed no evidence of recognized environmental conditions in connection with the subject property; however, environmental issues were identified. Based on the conclusions of this assessment, Partner recommends the following:

- Prior to the disturbance of any suspect ACM at the subject property, a comprehensive survey, designed to determine if the suspect materials are regulated, is recommended. If such materials are identified and need to be disturbed, repaired or removed, a licensed abatement contractor should be consulted.

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1.0 INTRODUCTION

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Standard Practice E1527-13 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) for the property located at 2323 West Broadway in Anaheim, Orange County, California (the "subject property"). Any exceptions to, or deletions from, this scope of work are described in the report.

1.1 Purpose

The purpose of this ESA is to identify existing or potential Recognized Environmental Conditions (as defined by ASTM Standard E1527-13) affecting the subject property that: 1) constitute or result in a material violation or a potential material violation of any applicable environmental law; 2) impose any material constraints on the operation of the subject property or require a material change in the use thereof; 3) require clean-up, remedial action or other response with respect to Hazardous Substances or Petroleum Products on or affecting the subject property under any applicable environmental law; 4) may affect the value of the subject property; and 5) may require specific actions to be performed with regard to such conditions and circumstances. The information contained in the ESA Report will be used by Client to: 1) evaluate its legal and financial liabilities for transactions related to foreclosure, purchase, sale, loan origination, loan workout or seller financing; 2) evaluate the subject property's overall development potential, the associated market value and the impact of applicable laws that restrict financial and other types of assistance for the future development of the subject property; and/or 3) determine whether specific actions are required to be performed prior to the foreclosure, purchase, sale, loan origination, loan workout or seller financing of the subject property.

This ESA was performed to permit the *User* to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on scope of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) liability (hereinafter, the "*landowner liability protections*," or "*LLPs*"). ASTM Standard E1527-13 constitutes "*all appropriate inquiry* into the previous ownership and uses of the *property* consistent with good commercial or customary practice" as defined at 42 U.S.C. §9601(35)(B).

1.2 Scope of Work

The scope of work for this ESA is in accordance with the requirements of ASTM Standard E1527-13. This assessment included: 1) a property and adjacent site reconnaissance; 2) interviews with key personnel; 3) a review of historical sources; 4) a review of regulatory agency records; and 5) a review of a regulatory database report provided by a third-party vendor. Partner contacted local agencies, such as environmental health departments, fire departments and building departments in order to determine any current and/or former hazardous substances usage, storage and/or releases of hazardous substances on the subject property. Additionally, Partner researched information on the presence of activity and use limitations (AULs) at these agencies. As defined by ASTM E1527-13, AULs are the legal or physical restrictions or limitations on the use of, or access to, a site or facility: 1) to reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil or groundwater on the subject

property; or 2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. These legal or physical restrictions, which may include institutional and/or engineering controls (IC/ECs), are intended to prevent adverse impacts to individuals or populations that may be exposed to hazardous substances and petroleum products in the soil or groundwater on the property.

If requested by Client, this report may also include the identification, discussion of, and/or limited sampling of asbestos-containing materials (ACMs), lead-based paint (LBP), mold, and/or radon.

1.3 Limitations

Partner warrants that the findings and conclusions contained herein were accomplished in accordance with the methodologies set forth in the 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. There is a possibility that even with the proper application of these methodologies there may exist on the subject property conditions that could not be identified within the scope of the assessment or which were not reasonably identifiable from the available information. Partner believes that the information obtained from the record review and the interviews concerning the subject property is reliable. However, Partner cannot and does not warrant or guarantee that the information provided by these other sources is accurate or complete. The conclusions and findings set forth in this report are strictly limited in time and scope 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. No other warranties are implied or expressed.

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 subject to the limitations of historical documentation, availability, and accuracy of pertinent records, and the personal recollections of those persons contacted.

This practice does not address requirements of any state or local laws or of any federal laws other than the all appropriate inquiry provisions of the LLPs. Further, this report does not intend to address all of the safety concerns, if any, associated with the subject property.

Environmental concerns, which are beyond the scope of a Phase I ESA as defined by ASTM include the following: ACMs, LBP, radon, and lead in drinking water. These issues may affect environmental risk at the subject property and may warrant discussion and/or assessment; however, are considered non-scope issues. If specifically requested by the Client, these non-scope issues are discussed in Section 6.3.

1.4 User Reliance

Melia Homes engaged Partner to perform this assessment in accordance with an agreement governing the nature, scope and purpose of the work as well as other matters critical to the engagement. All reports, both verbal and written, are for the sole use and benefit of Melia Homes. Either verbally or in writing, third parties may come into possession of this report or all or part of the information generated

as a result of this work. In the absence of a written agreement with Partner granting such rights, no third parties shall have rights of recourse or recovery whatsoever under any course of action against Partner, its officers, employees, vendors, successors or assigns. Any such unauthorized user shall be responsible to protect, indemnify and hold Partner, Client and their respective officers, employees, vendors, successors and assigns harmless from any and all claims, damages, losses, liabilities, expenses (including reasonable attorneys' fees) and costs attributable to such Use. Unauthorized use of this report shall constitute acceptance of and commitment to these responsibilities, which shall be irrevocable and shall apply regardless of the cause of action or legal theory pled or asserted. Additional legal penalties may apply.

1.5 Limiting Conditions

The findings and conclusions contain all of the limitations inherent in these methodologies that are referred to in ASTM E1527-13. Specific limitations and exceptions to this ESA are more specifically set forth below:

- Interviews with past or current owners, operators and occupants were not reasonably ascertainable and thus constitute a data gap. Based on information obtained from other historical sources (as discussed in Section 3.0), this data gap is not expected to alter the findings of this assessment.
- Partner was unable to determine the property use at 5-year intervals or less for all time periods, which constitutes a data gap. Based on information obtained from the available historical sources (as discussed in Section 3.0), this data gap is not expected to alter the findings of this assessment.
- Partner observed approximately 30% of all interiors of the buildings and all common areas. Based on the size and nature of use of the unobserved areas (classroom), this limited method of survey is not expected to alter the overall findings of this assessment.

Due to time constraints associated with this report, the Client has requested the report despite the above-listed limitations.

2.0 SITE DESCRIPTION

2.1 Site Location and Legal Description

The subject property at 2323 West Broadway in Anaheim, California is located on the northern side of West Broadway and approximately 0.23-mile to the west of Brookhurst Street . According to the Orange County Assessor (OCA), Chicago Title Company, client-provided documents, and building permit records, the subject property is identified as Assessor Parcel Number (APN) 127-051-43, and ownership has been vested in Cornelia Connelly School of the Holy Child since July 1960.

Please refer to Figure 1: Site Location Map, Figure 2: Site Plan, Figure 3: Topographic Map, and Appendix A: Site Photographs for the location and site characteristics of the subject property.

2.2 Current Property Use

The subject property is currently a vacant school. No operations are conducted onsite. The subject property consists of five single-story structures including two classroom buildings, main office/library and administration office buildings, and a multi-purpose building. In addition to the current structures, the subject property is also improved with a small storage shed, an asphalt-paved parking area, basketball/tennis courts, graded grassland, concrete-paved walkways, pad-mounted transformers, and associated landscaping.

The subject property is designated for Transition development by the City of Anaheim.

The subject property was identified in the regulatory database report, as further discussed in Section 4.2.

2.3 Current Use of Adjacent Properties

The subject property is located within a mixed commercial and residential area of Orange County. During the vicinity reconnaissance, Partner observed the following land use on properties in the immediate vicinity of the subject property:

Immediately Surrounding Properties

- North:** Single-family residences (2304-2370 West Canopy Lane) to the north; a multi-family complex (2260 West Lincoln Avenue) to the northeast
- South:** West Broadway beyond which are single-family residences (2318-2328 West Broadway, 303 and 304 South Rosebay Street, 9251 Greenwich Lane)
- East:** Multi-family complex (2235 West Broadway)
- West:** Single-family residences (2331 West Transit Avenue, 202-212 South Corner Street, 2333 West Mall Avenue, 2331 West Broadway)

The adjacent properties to the east and north were identified in the regulatory database report of Section 4.2.

2.4 Physical Setting Sources

2.4.1 Topography

The United States Geological Survey (USGS) *Anaheim, California* Quadrangle 7.5-minute series topographic map was reviewed for this ESA. According to the contour lines on the topographic map, the

subject property is located at approximately 105 feet above mean sea level (MSL). The contour lines in the area of the subject property indicate the area is sloping gently toward the southwest. Improvements with the exception of roadways are not depicted on the 2012 map.

A copy of the most recent topographic map is included as Figure 3 of this report.

2.4.2 Hydrology

According to topographic map interpretation, the direction of groundwater flow in the vicinity of the subject property is inferred to be toward the southwest. The nearest surface water in the vicinity of the subject property is a pond located at the Dad Miller Driver Range situated approximately 0.55-mile to the northwest of the subject property. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins were observed at the subject property during this assessment.

According to available information, a public water system operated by the Anaheim Public Utilities Department serves the subject property vicinity. According to the 2020 Water Quality Report, the sources of public water for Anaheim include a blend of groundwater from city-owned wells and imported water from Northern California and the Colorado River by The Metropolitan Water District of Southern California (MWD).

According to information obtained from the California State Water Resources Control Board (SWRCB) GeoTracker database, of an investigation conducted at 2300 West Lincoln Avenue and Case #083003980T located adjacent to the north of the subject property, groundwater in the vicinity of the subject property is inferred to be approximately 47 to 57 feet bgs.

2.4.3 Geology/Soils

The subject property lies within the Orange County Coastal Plain area of the Los Angeles Basin. The plain consists of predominantly alluvial basin-fill material deposited by meandering tributaries of the Santa Ana River system (Morton, et al., 1979). Surficial geology in the subject property vicinity consists of recent alluvium of gravel, sand, silty sand, and clayey silt with an average thickness of 200 feet (Poland, et al., 1956; California DWR, 1967). This recent alluvium is underlain by the upper Pleistocene Lakewood Formation, which averages 500 feet in thickness and consists of alternating stratigraphic zones of coarse-grained sand and clayey silt. The estimated depth to bedrock is more than 200 feet.

Based on information obtained from the USDA Natural Resources Conservation Service Web Soil Survey online database, the subject property is mapped as San Emigdio fine sandy loam, moderately fine substratum. The San Emigdio series consists of very deep, well drained soils that formed in dominantly sedimentary alluvium. These soils are found on floodplains, alluvial fans, and in narrow valleys. Slopes range from 0 to 2 percent.

2.4.4 Flood Zone Information

Partner performed a review of the Flood Insurance Rate Map, published by the Federal Emergency Management Agency. According to Community Panel Number 06059C0129J, dated December 3, 2009, the subject property appears to be located in Zone X (shaded), an area with 0.2% annual chance flood

hazard and 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile.

A copy of the reviewed flood map is included in Appendix B.

3.0 HISTORICAL INFORMATION

Partner obtained historical use information about the subject property from a variety of sources. A chronological listing of the historical data found is summarized in the table below:

Historical Use Information		
Period/Date	Source	Description/Use
1935	Topographic Map	Undeveloped/Native Land
1938-1953	Aerial Photographs, Topographic Maps	Orchards
1962-Present	Aerial Photographs, Topographic Maps, Building Records, City Directories, Interviews, Assessor Records, Onsite Observations,	School

Tenants on the subject property include Sisters of The Holy Child (1962-2004); Cornelia Connelly School (1962-Present).

The subject property parcel was historically used for agricultural purposes as an orchard between as early as 1938 to at least 1953. There is a potential that agricultural related chemicals such as pesticides, herbicides, and fertilizers, may have been used and stored onsite. It is likely that some residual agricultural chemicals (if any) would have degraded since the site was last utilized for agricultural purposes due to natural attenuation. This variable serves to reduce the potential for exposure to residual agricultural chemicals (if any). The subject property was redeveloped with the existing improvements in beginning in 1963 to 1972 and the majority of the site has been covered with relatively impervious surfaces (including buildings and paved areas) since that time, which minimizes direct contact with any potential remaining concentrations in the soil. Furthermore, during the site grading activities, near surface soils (where residual agricultural chemical concentrations would have most likely been present, if at all) were generally mixed with fill material or disturbed during grading. Based on these reasons, the potential for elevated concentrations of environmentally persistent pesticides/herbicides to exist in the near-surface soils of the subject property, which would require regulatory action, appears to be low.

No additional potential environmental concerns were identified in association with the current or former use of the subject property.

3.1 Aerial Photograph Review

Partner obtained available aerial photographs of the subject property and surrounding area from Environmental Data Resources (EDR) on September 9, 2020. The following features and uses were visible on the subject property and adjacent properties during the aerial photograph review:

Date:	1938, 1947, 1953	Scale:	1"=500'
Subject Property:	Appears to be developed with an orchard		
North:	Appears to be developed with an orchard		
South:	Appears to be developed with an orchard across a road		
East:	Appears to be developed with an orchard		
West:	Appears to be developed with an orchard		

Date:	1963	Scale:	1"=500'
Subject Property:	Appears to be developed with the current southeast classroom building and two buildings on the northeastern corner of the property. A small orchard is visible within the southwestern corner		
North:	Appears to be developed with a large commercial building and parking lot		
South:	Appears to be developed with the current single-family residences across a road		
East:	No significant changes visible		
West:	Appears to be developed with the current single-family residences and roadways		

Date:	1972, 1977	Scale:	1"=500'
Subject Property:	Appears to be developed with the majority of the current improvements coupled with the additional structure within the northeastern corner		
North:	No significant changes visible to the north; appears to be developed with the current multi-family complex to the northeast		
South:	No significant changes visible		
East:	Appears to be developed with the current multi-family complex		
West:	No significant changes visible		

Date:	1987, 1990, 1994	Scale:	1"=500'
Subject Property:	Appears to be developed with the current buildings and uses		
North:	No significant changes visible		
South:	No significant changes visible		
East:	No significant changes visible		
West:	No significant changes visible		

Date:	2005	Scale:	1"=500'
Subject Property:	No significant changes visible		
North:	Appears to be developed with the current single-family residences		
South:	No significant changes visible		
East:	No significant changes visible		
West:	No significant changes visible		

Date:	2009, 2012, 2016	Scale:	1"=500'
Subject Property:	No significant changes visible except for the absence of the building within the northeastern portion		
North:	No significant changes visible		
South:	No significant changes visible		
East:	No significant changes visible		
West:	No significant changes visible		

Copies of the aerial photographs are included in Appendix B.

3.2 Fire Insurance Maps

Partner contracted with EDR to search for Sanborn Map coverage of the subject property on September 9, 2020. Sanborn map coverage was not available for the subject property.

A copy of the *Certified Sanborn Map Report* is included in Appendix B.

3.3 City Directories

Partner reviewed historical city directories obtained from Environmental Data Resources (EDR) on September 16, 2020 for past names and businesses that were listed for the subject property and adjacent properties. The findings are presented in the following table:

City Directory Search for 2323 West Broadway (Subject Property)

Year(s)	Occupant Listed
1966	Cornelia Connelly School, Sisters of The Holy Child
1970	Cornelia Connelly School, Sisters of The Holy Child
1975	Cornelia Connelly School, Sisters of The Holy Child
1980	Cornelia Connelly School, Sisters of The Holy Child
1986	Cornelia Connelly School, Sisters of The Holy Child, Sullivan Claire
1991	Cornelia Connelly School, Sisters of The Holy Child, Sullivan Claire
1994	Cornelia Connelly School, Sullivan Claire
1995	Cornelia Connelly School, Sisters of The Holy Child, Sullivan Claire
1999	Cornelia Connelly School, Tri School Theater
2004	Cornelia Connelly School, Sisters of The Holy Child, Yvonne Elizondo
2009	Cornelia Connelly High School
2015	Cornelia Connelly School

Based on the city directory review, no environmentally sensitive listings were identified for the subject property address.

City Directory Search for Adjacent Properties

Year(s)	Occupant Listed
1961	Residential listings (202, 208, 212 Corner Street; 2333 Mall Avenue; 2331 Transit Avenue; 2331 West Broadway)
1966	Residential listings (9251 Greenwich Court; 2318, 2328, 2331 West Broadway; 2331 West Transit Avenue); Sports Unlimited, Discount Associates Inc, Gemco Ladies Wear, Stack Melvin Doctor Optometrist (2300 Lincoln Avenue); Gemco Foods, Department Store, Major Appliances (2310 West Lincoln Avenue)
1970	Residential listings (2318, 2328, 2331, 2328 West Broadway; 202, 208, 212 Corner Street; 9251 Greenwich Court; 2333 Mall Avenue; 303 Rosebay; 2331 Transit Avenue); Stack Melvin Doctor Optometrist (2300 Lincoln Avenue); Gemco Department Store (2310 West Lincoln Avenue)
1975	Residential listings (9251 Greenwich Court; 202, 212 Corner Street, 2318, 2328, 2331 West Broadway; 2260 West Lincoln Avenue); Stack Melvin Doctor Optometrist (2300 Lincoln Avenue); Anaheim Store (2310 West Lincoln Avenue)
1980	Residential listings (9251 Greenwich Court; 212 Corner Street, 2318, 2328, 2331 West Broadway; 2260 West Lincoln Avenue); Anaheim Pharmacy Store (2310 West Lincoln Avenue)
1986	Residential listings (9251 Greenwich Court; 206, 212 Corner Street; 2328, 2331 West Broadway; 2260 West Lincoln Avenue); Stack Melvin Doctor Optometrist (2300 Lincoln Avenue); Anaheim (2310 West Lincoln Avenue)
1991	Residential listings (9251 Greenwich Court; 208, 212 Corner Street; 2324, 2331 West Broadway; 2260 West Lincoln Avenue; 2333 West Mall Avenue)
1994	Residential listings (9251 Greenwich Court; 208, 212 Corner Street; 304 Rosebay Street; 2324 West Broadway; 2260 West Lincoln Avenue; 2333 West Mall Avenue); Home Depot (2300 Lincoln Avenue)

City Directory Search for Adjacent Properties

Year(s)	Occupant Listed
1995	Residential listings (9251 Greenwich Court; 212 Corner Street; 2260 West Lincoln Avenue; 2333 West Mall Avenue); Home Depot (2300 Lincoln Avenue)
1999	Residential listings (9251 Greenwich Court; 202, 208, 212 Corner Street; 303, 304 Rosebay Street, 2318, 2324, 2328, 2331 West Broadway; 2260 West Lincoln Avenue); Home Depot Optometrist (2300 Lincoln Avenue)
2004	Residential listings (9251 Greenwich Court; 202, 212 Corner Street; 303, 304 Rosebay Street, 2318, 2324, 2328, 2331 West Broadway; 2260 West Lincoln Avenue; 2333 West Mall Avenue; 2331 West Transit Avenue)
2009	Residential listings (9251 Greenwich Court; 202, 208, 212 Corner Street; 303, 304 Rosebay Street, 2318, 2324, 2328, 2331 West Broadway; 2260 West Lincoln Avenue; 2333 West Mall Avenue; 2331 West Transit Avenue)
2015	Residential listings (9251 Greenwich Court; 202, 208, 212 Corner Street; 303, 304 Rosebay Street, 2; 2331 West Transit Avenue)18, 2324, 2328, 2331 West Broadway; 2260 West Lincoln Avenue; 2333 West Mall Avenue)

Based on the city directory review, no environmentally sensitive listings were identified for the adjacent property addresses.

Copies of reviewed city directories are included in Appendix B.

3.4 Historical Topographic Maps

Partner reviewed historical topographic maps obtained from Environmental Data Resources (EDR) on September 16, 2020. The following features and uses were depicted on the subject property and adjacent properties during the topographic map review:

Date: 1935

Subject Property:	Depicted as undeveloped land
North:	Depicted as undeveloped land
South:	Depicted as undeveloped land with a residential-type building to the southwest across a road
East:	Depicted as undeveloped land
West:	Depicted as undeveloped land

Date: 1942, 1949, 1950

Subject Property:	Depicted as developed with an orchard
North:	Depicted as developed with an orchard and residential-type buildings in the vicinity
South:	No significant changes depicted except for orchards in the vicinity
East:	Depicted as developed with an orchard
West:	Depicted as developed with an orchard

Date: 1965

Subject Property: Depicted as developed as Connelly High School with four commercial-type buildings
North: Depicted as developed with a large commercial-type building and shaded to indicate urban development to the northeast
South: Shaded to indicate urban land across West Broadway
East: No significant changes depicted
West: Shaded to indicate urban development

Date: 1972

Subject Property: No significant changes depicted
North: No significant changes depicted
South: No significant changes depicted
East: Shaded to indicate urban development
West: No significant changes depicted

Date: 1981

Subject Property: Depicted as developed with six commercial-type buildings
North: No significant changes depicted
South: No significant changes depicted
East: Shaded to indicate urban development
West: No significant changes depicted

Copies of reviewed topographic maps are included in Appendix B.

4.0 REGULATORY RECORDS REVIEW

4.1 Regulatory Agencies

4.1.1 State Department

Regulatory Agency Data

Name of Agency: California Environmental Protection Agency (Cal/EPA)
Point of Contact: CalEPA Regulated Sites Portal
Agency Address: <https://siteportal.calepa.ca.gov/nsite/>
1001 I Street, Sacramento, California 95814
Agency Phone Number: (916) 323-2514
Date of Contact: September 21, 2020
Method of Communication: Online Research
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the Cal/EPA.

4.1.2 Health Department

Regulatory Agency Data

Name of Agency: Orange County Health Care Agency (OCHCA)
Point of Contact: Ms. Suzanne Peralta
Agency Address: 1241 East Dyer Road, Suite 120, Santa Ana, California 92702
Agency Phone Number: (714) 433-6000
Date of Contact: September 21, 2020
Method of Communication: Online Portal, Email, Telephone
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the OCHCA.

4.1.3 Fire Department

Regulatory Agency Data

Name of Agency:	Anaheim Fire Department (AFD)
Point of Contact:	Ms. Aliana Meneses
Agency Address:	201 South Anaheim Boulevard, Suite 300, Anaheim, California 92805
Agency Phone Number:	(714) 765-4608
Date of Contact:	September 16, 2020
Method of Communication:	Email
Summary of Communication:	No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the AFD.

4.1.4 Air Pollution Control Agency

Regulatory Agency Data

Name of Agency:	Southern California Air Quality Management District (SCAQMD)
Point of Contact:	http://www3.aqmd.gov/webappl/fim/prog/search.aspx
Agency Address:	21865 Copley Drive, Diamond Bar, California
Agency Phone Number:	(909) 396-2000
Date of Contact:	September 21, 2020
Method of Communication:	SCAQMD Online F.I.N.D.S. Database
Summary of Communication:	No Permits to Operate (PTO), Notices of Violation (NOV), or Notices to Comply (NTC) or the presence of AULs, dry cleaning machines, or USTs were on file for the subject property with the SCAQMD.

4.1.5 Regional Water Quality Agency

Regulatory Agency Data

Name of Agency:	California Regional Water Quality Control Board (RWQCB)
Point of Contact:	http://geotracker.waterboards.ca.gov/
Agency Address:	3737 Main Street, Suite 500, Riverside, California
Agency Phone Number:	(951) 782-4130
Date of Contact:	September 16, 2020
Method of Communication:	Online
Summary of Communication:	No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the RWQCB.

4.1.6 Department of Toxic Substances Control

Regulatory Agency Data

Name of Agency:	California Department of Toxic Substances Control (DTSC)
Point of Contact:	https://www.envirostor.dtsc.ca.gov/public/ https://hwts.dtsc.ca.gov/report_list.cfm
Agency Address:	5796 Corporate Drive, Cypress, California
Agency Phone Number:	(714) 484-5300
Date of Contact:	September 16, 2020
Method of Communication:	Online
Summary of Communication:	No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the DTSC.

Hazardous Waste Transport System

Status/Date	Facility	Waste Description
Inactive 10/29/2015	Cornelia Connelly High School	0.23-tons of asbestos material
Inactive 06/30/2017	Cornelia Connelly High School	Multiple waste streams from 1996 to 2013

A discussion of the specific waste streams is included in Section 4.2.2

4.1.7 Building Department

Regulatory Agency Data

Name of Agency:	Building Division, City of Anaheim Planning & Building Department (APBD)
Point of Contact:	https://www.anaheim.net/527/Permits
Agency Address:	200 South Anaheim Boulevard, Anaheim, California 92805
Agency Phone Number:	(714) 765-5153
Date of Contact:	September 16, 2020
Method of Communication:	Online
Summary of Communication:	Records were available for review, as further discussed in the following table.

Building Records Reviewed for 2323 West Broadway (Subject Property)

Year(s)	Owner/Applicant	Description
1961	Society of The Holy Child Jesus	Erect new convent & girls high school (27,000 SF, grouted brick)
1961	Not Provided	Sewer Connection Permit
1961	Cornelia Connelly High School	Plumbing & Gas Fittings Permit
1962	Cornelia Connelly High School	Erect block wall
1963	Not Provided	Sewer Connection Permit
1963	Society of The Holy Child Jesus	13,538-SF addition to existing high school
1971	Cornelia Connelly High School	New block wall
1971	Cornelia Connelly School	Plumbing Permit
1977	Cornelia Connelly School	Classroom and multi-purpose building additions
1977	Cornelia Connelly School	Brick wall addition to existing school
1977	Cornelia Connelly School	Mechanical (heating/ventilation), Electric, and Plumbing

Building Records Reviewed for 2323 West Broadway (Subject Property)

Year(s)	Owner/Applicant	Description
		Permits
1980	Cornelia Connelly	Remove existing patio
1980	Cornelia Connelly	Locker room addition
1981	Connelly High School	Electric Permit
1984	Cornelia Connelly School	Mechanical Permit
1986	Cornelia Connelly School	Convert school building to a storage building
1986	Cornelia Connelly School, Maurice Monig, Larry Nelson	Electric Permit
1986	Connelly School	Re-roof
1986	Cornelia Connelly School	Investigation Report: garage destroyed by fire
1987	Cornelia Connelly School	New block wall and garden wall
1987	Cornelia Connelly School	Remodel classroom walls to provide science lab and storage
1987	Cornelia Connelly School	Mechanical and Plumbing Permits
1998	Cornelia Connelly School	Electric Permit
1999	Cornelia Connelly School	Mechanical screening and structural reports for tenant improvements
1999	Cornelia Connelly School	Electric, Plumbing, and Mechanical (heating/ventilation) Permits
1999	Cornelia Connelly School	Utility (gas) Release (commercial)
2003	Connelly S Cornelia	Build high block wall per city standards
2004	Connelly S Cornelia	Remodel admin building
2004	Connelly S Cornelia	Electric and Mechanical Permits
2005	Cornelia Connelly High School	SCAQMD Permit regarding 9,000-SF, single-story building demolition (45 years old) (asbestos removed)
2006	Connelly S Cornelia	Sewer cap for complete demolition of existing 9,224-SF convent structure
2007	Cornelia School	Certificate of Compliance
2007	Cornelia Connelly School	Two temporary modular buildings
2007	Connelly S Cornelia	New 19,650-SF gymnasium (presumably not constructed)
2012	Cornelia Connelly School	Certificate of Occupancy for change of use from library to multi-purpose room, and multi-purpose room to classroom
2017	Cornelia Connelly School	New illuminated sign "Cornelia Connelly School"

4.1.7 Planning Department

Regulatory Agency Data

Name of Agency:	Planning Services Division, City of Anaheim Planning & Building Department (APBD)
Point of Contact:	https://www.anaheim.net/1002/Property-Info
Agency Address:	200 South Anaheim Boulevard, Anaheim, California 92805
Agency Phone Number:	(714) 765-5153
Date of Contact:	September 21, 2020
Method of Communication:	Online
Summary of Communication:	According to records reviewed, the subject property is zoned for Transition (T) development by the City of Anaheim. The T Zone "is to

Regulatory Agency Data

provide for a zone to include land that is used for agricultural purposes, in a transitory or interim use, restricted to limited uses because of special conditions, or not zoned to one of the zoning districts in this title for whatever reason, including recent annexation.”

4.1.8 Oil & Gas Exploration

Regulatory Agency Data

Name of Agency: California Department of Conservation (DOC) Geologic Energy Management Division (CalGEM)
Point of Contact: <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.12009/6>
Agency Address: 801 K Street, Sacramento, California
Agency Phone Number: (916) 322-1080
Date of Contact: May 14, 2020
Method of Communication: Online Review
Summary of Communication: According to CalGEM, no oil or gas wells are located on or adjacent to the subject property.

4.1.9 Assessor's Office

Regulatory Agency Data

Name of Agency: Orange County Assessor (OCA), The Chicago Title Company
Point of Contact: <https://www.ocgis.com/ocpw/LandRecords/https://chicagotitleadvantage.com/>
Agency Address: 500 South Main Street, 2nd Floor, Orange, California 92868
Agency Phone Number: (714) 834-2727
Date of Contact: September 16, 2020
Method of Communication: Online
Summary of Communication: According to records reviewed, the subject property is identified by Assessor Parcel Number (APN) 127-051-43 and is currently owned by Cornelia Connelly School of The Holy Child. The current buildings were reportedly constructed in 1962 and total approximately 11,521 square feet on a 6.58-acre lot.

4.1.10 Sanitation District

Regulatory Agency Data

Name of Agency: Orange County Sanitation District (OCSD)
Point of Contact: Ms. Tina Knapp
Agency Address: 10844 Ellis Avenue, Fountain Valley, California
Agency Phone Number: (714) 962-2411
Date of Contact: September 16, 2020
Method of Communication: Online Portal, Email
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on

Regulatory Agency Data

file with the OCSD.

Copies of pertinent documents obtained from the regulatory agencies listed above, if available, are included in Appendix B.

4.2 Mapped Database Records Search

Information from standard federal, state, county, and city environmental record sources was provided by Environmental Data Resources, Inc. (EDR). Data from governmental agency lists are updated and integrated into one database, which is updated as these data are released. The information contained in this report was compiled from publicly available sources and the locations of the sites are plotted utilizing a geographic information system, which geocodes the site addresses. The accuracy of the geocoded locations is approximately +/-300 feet.

Using the ASTM definition of migration, Partner considers the migration of hazardous substances or petroleum products in any form onto the subject property during the evaluation of each site listed on the radius report, which includes solid, liquid, and vapor.

4.2.1 Regulatory Database Summary

Radius Report Data

Database	Search Radius (mile)	Subject Property	Adjacent Properties	Sites of Concern
Federal NPL or Delisted NPL Site	1.00	N	N	N
Federal CERCLIS Site	0.50	N	N	N
Federal CERCLIS-NFRAP Site	0.50	N	N	N
Federal RCRA CORRACTS Facility	1.00	N	N	N
Federal RCRA TSD Facility	0.50	N	N	N
Federal RCRA Generators Site (LQG, SQG, CESQG)	0.25	N	Y	N
Federal IC/EC Registries	0.50	N	N	N
Federal ERNS Site	Subject Property	N	N	N
State/Tribal Equivalent NPL	1.00	N	N	N
State/Tribal Equivalent CERCLIS	1.00	N	N	N
State/Tribal Landfill/Solid Waste Disposal Site	0.50	N	N	N
State/Tribal Leaking Storage Tank Site	0.50	N	Y	N
State/Tribal Registered Storage Tank Sites (UST/AST)	0.25	N	N	N
State/Tribal Voluntary Cleanup Sites (VCP)	0.50	N	N	N
State/Tribal Spills	0.50	N	Y	N
Federal Brownfield Sites	0.50	N	N	N
State Brownfield Sites	0.50	N	N	N
EDR MGP	Varies	N	N	N
EDR US Hist Auto Station	Varies	N	N	N
EDR US Hist Cleaners	Varies	N	N	N
Miscellaneous Databases	Varies	Y	Y	N

4.2.2 Subject Property Listings

The subject property is identified as a Facility and Manifest Data (HAZNET), Hazardous Waste Tracking System (HWTS), and California Integrated Water Quality System (CIWQS) site in the regulatory database report, as discussed below:

- Cornelia Connelly High School and Cornelia Connelly School at 2323 West Broadway, is listed as a HAZNET and HWTS site in the regulatory database report. The facility properly disposed of several waste categories between 1996 and 2013 under EPA ID Number CAL000128621. Waste disposal categories include 0.18 tons of off-speciated, aged or surplus organics in 1996; 0.20 tons of other organic solids in 1998; 0.02 tons of laboratory waste chemicals and 0.02 tons of liquids with a pH less than or equal to 2 in 2000; 0.20 tons of unspecified solvent mixture in 2003; 4.6 tons of asbestos-containing waste in 2005; 5.75 tons of asbestos-containing waste, 0.01 tons of off-speciated, aged or surplus organics, and 0.02 tons of laboratory chemicals in 2006; 0.14 tons of unspecified solvent mixture and 0.10 tons of other organic solids in 2007; 0.01 tons of other inorganic solid waste, 0.01 tons of hydrocarbon solvents, and 0.01 tons of laboratory waste chemicals in 2008; 0.21 tons of organic solids with halogens in 2009; 0.03 tons of laboratory waste chemicals in 2011; 1.84 tons of asbestos-containing waste in 2012; and 0.01 tons of waste oil and mixed oil and 0.03 tons of laboratory waste chemicals in 2013. The subject property additionally disposed of 0.23 tons of asbestos-containing waste in 2015 under EPA ID Number CAC002835597. Based on the removal of the waste substances, small quantity of halogens identified, the absence of fire department violations or releases, these listings are not expected to represent a significant environmental concern.
- New Gymnasium Building at 2323 West Broadway is reported as a CIWQS site. According to information obtained from the SWRCB Facility-At-A-Glance online database, the subject property obtained a Storm Water Construction Permit under WDID Number 8 30C341717 on June 6, 2006 in connection with the construction of a new gymnasium structure. The permit was reportedly terminated on September 28, 2010. Based on historical review, Partner presumes that the proposed building was never constructed. Based on the nature of the permit coupled with the absence of reported violations, this listing is not expected to represent a significant environmental concern.

4.2.3 Adjacent Property Listings

The adjacent property to the east is identified as a Resources Conservation and Recovery Act Non-Generator/No Longer Regulated (RCRA NonGen/NLR) site and the adjacent property to the north is identified as a (DEED), Facility and Manifest Data (HAZNET), Hazardous Waste Tracking System (HWTS), Leaking Underground Storage Tank (LUST), Cleanup Program Sites – Spills, Leaks, Investigations, and Cleanups (CPS-SLIC), California Environmental Reporting System (CERS), Hazardous Waste & Substances Site List (Cortese), RCRA – Small Quantity Generator (SQG), Facility Index System (FINDS), and Enforcement Compliance History Online (ECHO) site in the regulatory database report, as discussed below:

- Madison Park and Madison Park Apartments at 2235 West Broadway, is located adjacent to the east of the subject property. These facilities registered as RCRA Non-Generator sites under the following EPA ID Numbers: CAC003011830, CAC002993678, CAC002983778, CAC003040451, CAC003045844, CAC002975372, CAC003016461, CAC003001241, CAC002979899, CAC003059707, and CAC003024279. Based on the nature of the listings coupled with the absence of a reported release in connection with this site, this facility is not expected to represent a significant environmental concern.
- Cantada Square, 1x The Home Depot, Daniel's Home Center, and Tesoro Gasoline Digas Anaheim at 2300 and 2310 West Lincoln Avenue is located adjacent to the north of the subject property. According to historical review, the adjacent property to the north was formerly developed with a relatively large warehouse structure up until as late as the mid-1900's. This former building (2300 West Lincoln Avenue) was developed and occupied by Gemco Department Store in 1959 with applied additions in 1961. Furthermore, a Tesoro-Digas service station (2310 West Lincoln Avenue) operated on the property in connection with the structure between approximately 1960 and 1980 until the station was relocated to 2330 West Lincoln Avenue. Based on aerial imagery and available online information, the former service station was situated on the northeast corner of the site and approximately 350 feet to the north-northeast of the subject property. According to the regulatory database report and GeoTracker documents, this site is listed in connection with hazardous waste generation and disposal, a hydrocarbon release, and a deed restriction.

A former warehouse tenant at this site, identified as Home Depot, reportedly disposed of various quantities of several hazardous waste categories between 1990 and 1999, including asbestos-containing waste, polychlorinated biphenyls (PCBs), and other organic solids. Furthermore, the associated gas station, identified as Tesoro Gasoline Digas Anaheim, was listed in the RCRA database as a SQG in 1996 and a Large Quantity Generator (LQG) in 1980 under EPA ID Number CAD000627885. No hazardous material categories are provided.

Furthermore, this site reported a release of gasoline, waste oil, and motor/hydraulic/lubricating oil to the lead agency (Santa Ana RWQCB) with impacts to soil and groundwater on July 31, 2003. Four monitoring wells were installed in August 2003 to evaluate the current groundwater conditions on the property. During the course of the investigation, low levels of Total Petroleum Hydrocarbons as gasoline (TPH-g), benzene, toluene, ethylbenzene, and total xylene were detected in one of groundwater monitoring wells, presumably as a result from residual soils that were driven into the groundwater during well installation operations. Based on the subsurface investigation results, residual TPH-g was detected in the subsurface soils within the eastern portion of the property. Two hydrocarbon plumes, identified as the West Plume and East Plume, were detected to the northeast of the former structure and approximately 500 feet to the north of the subject property. In addition, a former waste oil tank was identified to the south of the plumes and approximately 440 feet to the north of the subject property. The waste oil tank and impacted soils were excavated and removed from the property on August 8, 2003 under AFD supervision. Two additional groundwater monitoring wells were installed within the vicinity of the eastern

plume on May 10, 2005 as part of the post remedial monitoring process. Subsequent monitoring events showed no detectable hydrocarbon concentrations.

An in situ soil vapor extraction (SVE) system was also implemented on August 5, 2004. In addition, the Remedial Action Plan for the property included "the imposition of institutional controls on future land use for the protection of human health and the environment, specifically restricting soil disturbance below a depth of five feet and prohibiting disturbance of any engineering controls." The RAP also required the installation of a vapor barrier over the former East Plume. As such, a liquid boot vapor barrier was installed in November 2005 within the former east plume area beneath the current residence. Approximately 5,162 pounds of hydrocarbons were removed during the seven-month SVE operations in both plumes. Furthermore, 1,268 tons of impacted soil was removed from the West Plume area during the remedial action process. Based on the results discussed in the Remedial Action Completion Report, dated March 26, 2007, all goals were met and no further remedial action was warranted. A No Further Action (NFA) letter was issued for this property by the RWQCB on January 12, 2010. Based on the relative distance of the former gas station, waste oil tank, and hydrocarbon plumes, reported soil excavation, and regulatory closure, the historical use of the adjacent property to the north is not expected to represent a significant environmental concern.

Based on the findings, vapor migration is not expected to represent a significant environmental concern at this time.

4.2.4 Sites of Concern Listings

No sites of concern were identified in the regulatory database report.

Based on the findings, vapor migration is not expected to represent a significant environmental concern at this time.

4.2.5 Orphan Listings

No orphan listings are identified in the regulatory database report.

A copy of the regulatory database report is included in Appendix C.

5.0 USER PROVIDED INFORMATION AND INTERVIEWS

In order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the *Brownfields Amendments*), the *User* must conduct the following inquiries required by 40 CFR 312.25, 312.28, 312.29, 312.30, and 312.31. The *User* should provide the following information to the *environmental professional*. Failure to provide this information could result in a determination that *all appropriate inquiries* is not complete. The *User* is asked to provide information or knowledge of the following:

- Review Title and Judicial Records for Environmental Liens and AULs
- Specialized Knowledge or Experience of the User
- Actual Knowledge of the User
- Reason for Significantly Lower Purchase Price
- Commonly Known or *Reasonably Ascertainable* information
- Degree of Obviousness
- Reason for Preparation of this Phase I ESA

Fulfillment of these user responsibilities is key to qualification for the identified defenses to CERCLA liability. Partner requested our Client to provide information to satisfy User Responsibilities as identified in Section 6 of the ASTM guidance.

Pursuant to ASTM E1527-13, Partner requested the following site information from Melia Homes (User of this report).

User Responsibilities				
Item	Provided By User	Not Provided By User	Discussed Below	Does Not Apply
AAI User Questionnaire			X	
Title Records, Environmental Liens, and AULs			X	
Specialized Knowledge			X	
Actual Knowledge			X	
Valuation Reduction for Environmental Issues			X	
Identification of Key Site Manager	Section 5.1.3			
Reason for Performing Phase I ESA	Section 1.1			
Prior Environmental Reports		X		
Other				X

5.1 Interviews

5.1.1 Interview with Owner

The owner of the subject property since 1961, identified as Cornelia Connelly School of The Holy Child, was not available to be interviewed at the time of the assessment.

5.1.2 Interview with Report User

Mr. Chad Brown, report user, was not aware of any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or any notices from a governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

According to Mr. Brown, there are no USTs, ASTs, clarifiers, oil/water separators, groundwater monitoring wells, or hazardous substance use/storage/generation on the subject property to the best of his knowledge.

5.1.3 Interview with Key Site Manager

A key site manager was not provided at the time of this assessment.

5.1.4 Interviews with Past Owners, Operators and Occupants

Interviews with past owners, operators and occupants were not reasonably ascertainable and thus constitute a data gap.

5.1.5 Interview with Others

As the subject property is not an abandoned property as defined in ASTM 1527-13, interview with others were not performed.

5.2 User Provided Information

5.2.1 Title Records, Environmental Liens, and AULs

Partner was provided with a Preliminary Report prepared by Fidelity National Title Company dated July 29, 2020. According to this report, the subject property is listed with APN Number 127-051-43 and is currently owned by Cornelia Connelly School of the Holy Child, a California corporation since July 1960.

5.2.2 Specialized Knowledge

The User did not have specialized knowledge of environmental conditions associated with the subject property at the time of the assessment.

5.2.3 Actual Knowledge of the User

The User was not aware of environmental liens and/or AULs encumbering the subject property or in connection with the subject property at the time of the assessment.

5.2.4 Valuation Reduction for Environmental Issues

The User was not aware of any reductions in property value due to environmental issues.

5.2.5 Commonly Known or Reasonably Ascertainable Information

The User did not provide information that is commonly known or *reasonably ascertainable* within the local community about the subject property at the time of the assessment.

5.2.6 Previous Reports and Other Provided Documentation

No previous reports or other pertinent documentation was provided to Partner for review during the course of this assessment.

6.0 SITE RECONNAISSANCE

The weather at the time of the site visit was sunny and clear. Refer to Section 1.5 for limitations encountered during the field reconnaissance and Sections 2.1 and 2.2 for subject property operations. The table below provides the site assessment details:

Site Assessment Data

Site Assessment Performed By: Brooke Hasty
Site Assessment Conducted On: September 21, 2020

The table below provides the subject property personnel interviewed during the field reconnaissance:

Site Visit Personnel for 2323 West Broadway (Subject Property)

Name	Title/Role	Contact Number	Site Walk* Yes/No
Mr. Gary Masciel	Seller's Broker	(714) 612-8999	Yes

* Accompanied Partner during the field reconnaissance activities and provided information pertaining to the current operations and maintenance of the subject property.

No potential environmental concerns were identified during the onsite reconnaissance.

6.1 General Site Characteristics

6.1.1 Solid Waste Disposal

Solid waste is not currently generated at the subject property; however, commercial solid waste dumpsters serviced by Republic Services were observed on the subject property during the site reconnaissance. No evidence of illegal dumping of solid waste was observed during the Partner site reconnaissance.

6.1.2 Sewage Discharge and Disposal

Sanitary discharges are not currently generated on the subject property. The subject property is reportedly connected to the municipal sanitary sewer system. The City of Anaheim services the subject property vicinity. No wastewater treatment facilities or septic systems were observed or reported on the subject property.

6.1.3 Surface Water Drainage

Storm water is removed from the subject property primarily by sheet flow action across the paved surfaces towards storm water drains located throughout the subject property and in the public right of way. The subject property is connected to a municipal owned and maintained sewer system.

The subject property does not appear to be a designated wetland area, based on information obtained from the United States Fish & Wildlife Service. No surface impoundments, wetlands, natural catch basins, settling ponds, or lagoons are located on the subject property. No drywells were identified on the subject property.

6.1.4 Source of Heating and Cooling

Heating and cooling systems as well as domestic hot water equipment are fueled by electricity and natural gas provided by Anaheim Public Utilities Department and Southern California Gas Company, respectively.

6.1.5 Wells and Cisterns

No aboveground evidence of wells or cisterns was observed during the site reconnaissance.

6.1.6 Wastewater

Domestic wastewater generated at the subject property is disposed by means of the sanitary sewer system. No industrial process is currently performed at the subject property.

6.1.7 Septic Systems

No septic systems were observed or reported on the subject property.

6.1.8 Additional Site Observations

No additional general site characteristics were observed during the site reconnaissance.

6.2 Potential Environmental Hazards

6.2.1 Hazardous Substances and Petroleum Products Used or Stored at the Site

No evidence of the use of reportable quantities of hazardous substances was observed on the subject property. Small quantities of general maintenance and cleaning supplies were found to be properly labeled and stored at the time of the assessment with no signs of leaks, stains, or spills. The storage and use of maintenance supplies does not appear to pose a significant threat to the environmental integrity of the subject property at this time.

6.2.2 Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs/USTs)

No evidence of current or former ASTs or USTs was observed during the site reconnaissance.

6.2.3 Evidence of Releases

No spills, stains or other indications that a surficial release has occurred at the subject property were observed.

6.2.4 Polychlorinated Biphenyls (PCBs)

Older transformers and other electrical equipment could contain PCBs at a level that subjects them to regulation by the U.S. EPA. PCBs in electrical equipment are controlled by United States Environmental Protection Agency regulations 40 CFR, Part 761. Under the regulations, there are three categories into which electrical equipment can be classified: 1) Less than 50 parts per million (ppm) of PCBs – “Non-PCB;” 2) 50 ppm-500 ppm – “PCB-Contaminated;” and, 3) Greater than 500 ppm – “PCB-Containing.” The manufacture, process, or distribution in commerce or use of any PCB in any manner other than in a totally enclosed manner was prohibited after July 2, 1979.

The on-site reconnaissance addressed indoor and outdoor transformers that may contain PCBs. Three pad-mounted transformers were observed on the subject property. The transformers are not labeled indicating PCB content and appeared to be utility-owned. No staining or leakage was observed in the vicinity of the transformers. Based on the good condition of the equipment, transformers are not expected to represent a significant environmental concern.

Additionally, no other potential PCB-containing equipment (interior transformers, oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, balers, etc.) was observed on the subject property during Partner's reconnaissance.

6.2.5 Strong, Pungent or Noxious Odors

No strong, pungent or noxious odors were evident during the site reconnaissance.

6.2.6 Pools of Liquid

No pools of liquid were observed on the subject property during the site reconnaissance.

6.2.7 Drains, Sumps and Clarifiers

One floor drain was observed in the Main Office Building. Based on the nature of use for domestic purposes, this drain is not expected to represent a significant environmental concern.

No additional drains, sumps, or clarifiers, other than those associated with storm water removal, were observed on the subject property during the site reconnaissance.

6.2.8 Pits, Ponds and Lagoons

No pits, ponds or lagoons were observed on the subject property.

6.2.9 Stressed Vegetation

No stressed vegetation was observed on the subject property.

6.2.10 Additional Potential Environmental Hazards

No additional environmental hazards, including landfill activities or radiological hazards, were observed.

6.3 Non-ASTM Services

6.3.1 Asbestos-Containing Materials (ACMs)

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. All thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building that have not been appropriately tested are "presumed asbestos-containing material" (PACM).

The subject property buildings were constructed in 1962 and 1963 with applied additions in 1977 and 1980. A limited, visual evaluation of accessible areas for the presence of suspect ACMs at the subject

property was conducted. The objective of this visual survey was to note the presence and condition of suspect ACM observed. Please refer to the table below for identified suspect ACMs:

Suspect ACMs

Suspect ACM	Location	Friable Yes/No	Physical Condition
Drywall Systems	Throughout Building Interior	No	Good
Floor Tiles	Throughout Building Interior	No	Good
Floor Tile Mastic	Throughout Building Interior	No	Good
Carpet Mastic	Throughout Building Interior	No	Good
Ceiling Tiles	Throughout Building Interior	Yes	Good
Spray-Applied Acoustical Material	Throughout Building Interior	Yes	Good
Stucco	Throughout Building Exterior	Yes	Good
Roofing Material	Roof	No	Not Assessed

Based on this building's date of construction, prior to disturbance, Partner recommends a comprehensive asbestos survey of the property be completed to determine the presence, condition, friability and likely future condition of suspect or confirmed ACM. All suspect materials must be handled as ACM according to local, state and federal regulations until the results of sampling and analysis indicate the material is a non-ACM. According to the US EPA, ACM that is intact and in good condition can, in general, be managed safely in-place under an Operations and Maintenance (O&M) Program until removal is dictated by renovation, demolition, or deteriorating material condition.

The limited visual survey consisted of noting observable materials (materials which were readily accessible and visible during the course of the site reconnaissance) that are commonly known to potentially contain asbestos. This activity was not designed to discover all sources of suspect ACM, PACM, or asbestos at the site; or to comply with any regulations and/or laws relative to planned disturbance of building materials such as renovation or demolition, or any other regulatory purpose. Rather, it is intended to give the User an indication if significant (significant due to quantity, accessibility, or condition) potential sources of ACM or PACM are present at the subject property. Additional sampling, assessment, and evaluation will be warranted for any other use.

Partner was not provided building plans or specifications for review, which may have been useful in determining areas likely to have used ACM.

According to the US EPA, ACM and PACM that is intact and in good condition can, in general, be managed safely in-place under an Operations and Maintenance (O&M) Program until removal is dictated by renovation, demolition, or deteriorating material condition. Prior to any disturbance of the construction materials within this facility, a comprehensive ACM survey is recommended.

6.3.2 Lead-Based Paint (LBP)

Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm² (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.

Based on the age of the subject property buildings (pre-1978), there is a potential that LBP is present. Interior and exterior painted surfaces were observed in good condition and therefore not expected to represent a “hazard,” although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated.

Actual material samples would need to be collected in order to determine if LBP is present.

6.3.3 Radon

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The US EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, according to the table below:

EPA Radon Zones		
EPA Zones	Average Predicted Radon Levels	Potential
Zone 1	Exceed 4.0 pCi/L	Highest
Zone 2	Between 2.0 and 4.0 pCi/L	Moderate
Zone 3	Less than 2.0 pCi/L	Low

It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the US EPA recommends site-specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not conducted as part of this assessment. Review of the US EPA Map of Radon Zones places the subject property in Zone 3. Based upon the radon zone classification, radon is not considered to be a significant environmental concern.

6.3.4 Lead in Drinking Water

According to available information, a public water system operated by the Anaheim Public Utilities Department serves the subject property vicinity. The sources of public water for Anaheim include a blend of groundwater from city-owned wells and imported water from Northern California and the Colorado River by The Metropolitan Water District of Southern California (MWD). According to the <City Name> and the 2020 Annual Water Quality Report, water supplied to the subject property is in compliance with all State and Federal regulations pertaining to drinking water standards, including lead and copper. Water sampling was not conducted to verify water quality.

6.3.5 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).

Partner observed accessible, interior areas for the subject property buildings for significant evidence of mold growth with the exceptions detailed in Section 1.5 of this report; however, this ESA should not be used as a mold survey or inspection. Additionally, this limited assessment was not designed to assess all areas of potential mold growth that may be affected by mold growth on the subject property. Rather, it is intended to give the client an indication as to whether or not conspicuous (based on observed areas) mold growth is present at the subject property. This evaluation did not include a review of pipe chases, mechanical systems, or areas behind enclosed walls and ceilings.

No obvious indications of water damage or mold growth were observed during Partner's visual assessment.

6.4 Adjacent Property Reconnaissance

The adjacent property reconnaissance consisted of observing the adjacent properties from the subject property premises. No items of environmental concern were identified on the adjacent properties during the site assessment, including hazardous substances, petroleum products, ASTs, USTs, evidence of releases, PCBs, strong or noxious odors, pools of liquids, sumps or clarifiers, pits or lagoons, stressed vegetation, or any other potential environmental hazards.

7.0 FINDINGS AND CONCLUSIONS

Findings

A *recognized environmental condition (REC)* refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The following was identified during the course of this assessment:

- Partner did not identify evidence of RECs during the course of this assessment.

A *controlled recognized environmental condition (CREC)* refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. The following was identified during the course of this assessment:

- Partner did not identify evidence of CRECs during the course of this assessment.

A *historical recognized environmental condition (HREC)* refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The following was identified during the course of this assessment:

- Partner did not identify evidence of HRECs during the course of this assessment.

An *environmental issue* refers to environmental concerns identified by Partner, which do not qualify as RECs; however, warrant further discussion. The following was identified during the course of this assessment:

- There is a potential that asbestos-containing materials (ACMs) are present. Overall, all suspect ACMs were observed in good condition and do not pose a health and safety concern to the occupants of the subject property at this time. The identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants.

Conclusions, Opinions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of 2323 West Broadway in Anaheim, Orange County, California (the "subject property"). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report.

This assessment has revealed no evidence of recognized environmental conditions in connection with the subject property; however, environmental issues were identified. Based on the conclusions of this assessment, Partner recommends the following:

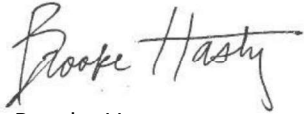
- Prior to the disturbance of any suspect ACM at the subject property, a comprehensive survey, designed to determine if the suspect materials are regulated, is recommended. If such materials are identified and need to be disturbed, repaired or removed, a licensed abatement contractor should be consulted.

8.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

Partner has performed a Phase I Environmental Site Assessment of the property located at 2323 West Broadway in Anaheim, Orange County, California in conformance with the scope and limitations of the protocol and the limitations stated earlier in this report. Exceptions to or deletions from this protocol are discussed earlier in this report.

By signing below, Partner declares that, to the best of our professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in §312.10 of 40 CFR §312. Partner has the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the subject *property*. Partner has developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Prepared By:



Brooke Hasty
Environmental Scientist

Reviewed By:



Sheryl A. Amezcua
Senior Author



Robert Vaughn
National Client Manager

9.0 REFERENCES

Reference Documents

American Society for Testing and Materials, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation: E1527-13.

Environmental Data Resources, Inc. (EDR), 6 Armstrong Road, 4th floor, Shelton, Connecticut 06484

EDR, Certified Sanborn Map Report, September 2020

EDR, Aerial Photo Decade Package, September 2020

EDR, City Directory Abstract, September 2020

EDR, Historical Topo Map Report, September 2020

EDR, Radius Map Report, September 2020

Federal Emergency Management Agency, Federal Insurance Administration, National Flood Insurance Program, Flood Insurance Map, accessed via internet, September 2020

United States Department of Agriculture, Natural Resources Conservation Service, accessed via internet, September 2020

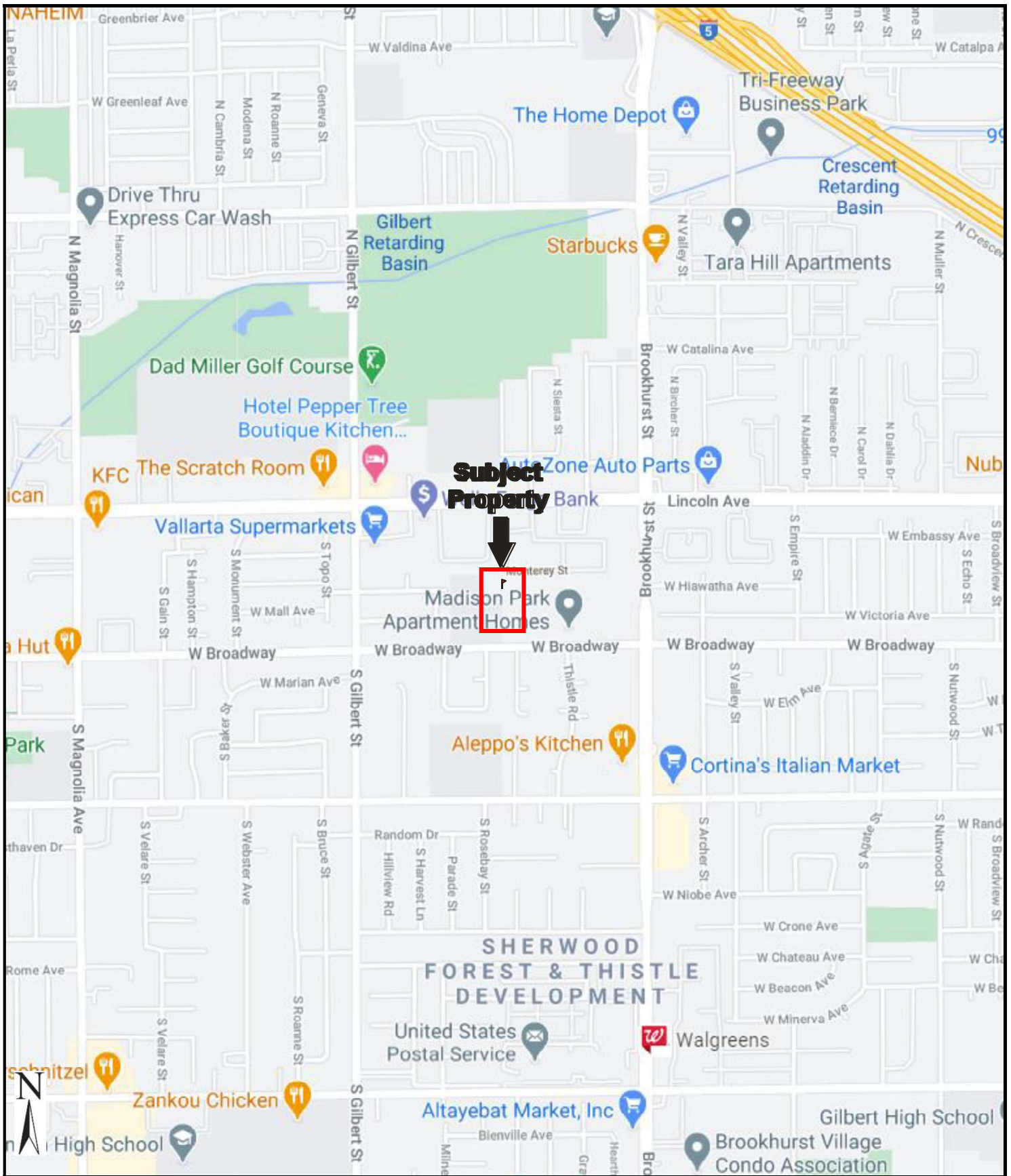
United States Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey, accessed via the internet, September 2020

United States Environmental Protection Agency, EPA Map of Radon Zones (Document EPA-402-R-93-071), accessed via the internet, September 2020

United States Geological Survey, accessed via the Internet, September 2020

FIGURES

- 1 SITE LOCATION MAP**
- 2 SITE PLAN**
- 3 TOPOGRAPHIC MAP**



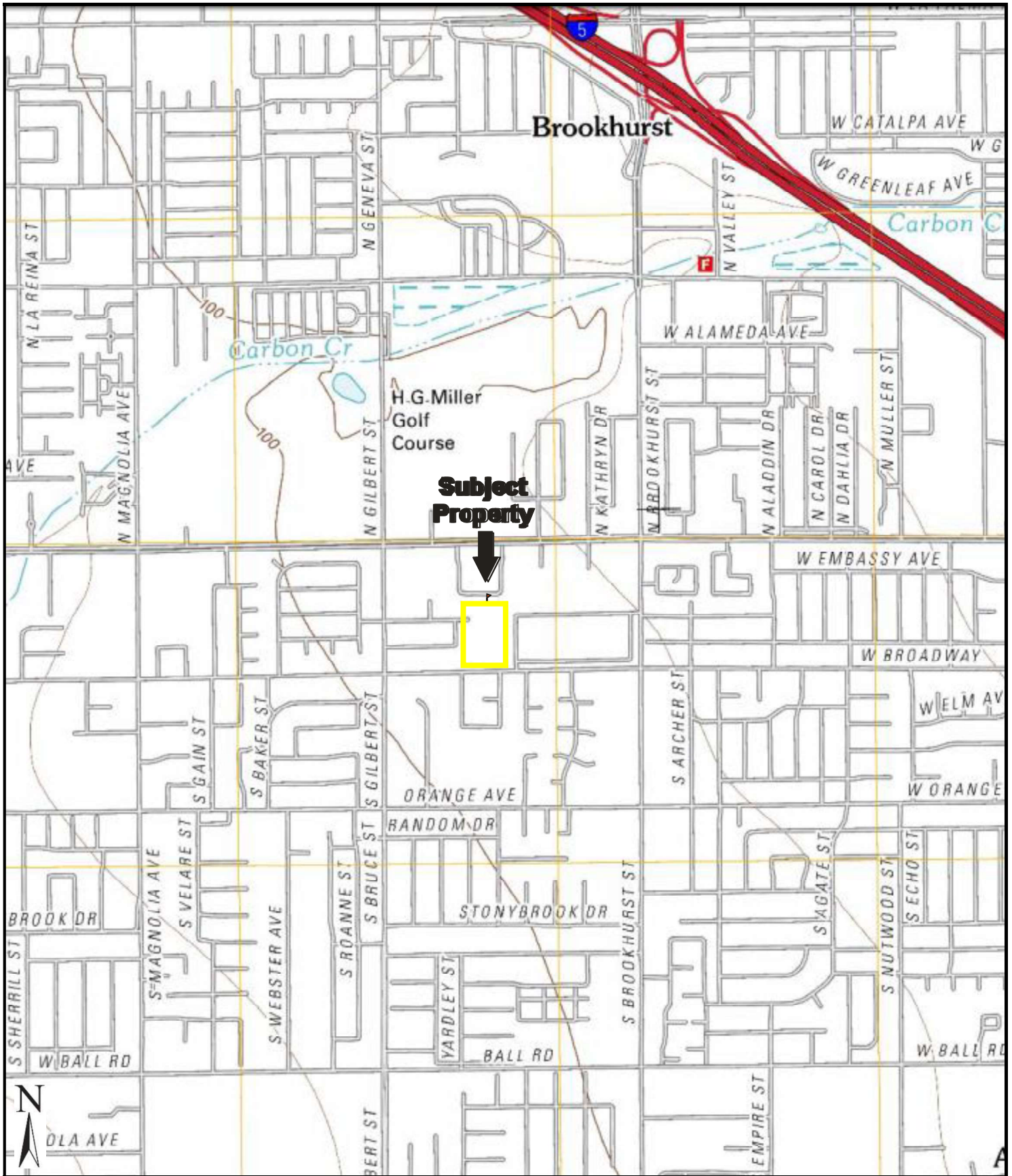
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KEY:
 Subject Property 

FIGURE 1: SITE LOCATION MAP
 Project No. 20-289531.1



FIGURE 2: SITE PLAN
Project No. 20-289531.1



USGS 7.5 Minute Anaheim, California Quadrangle
 Created: 2012

KEY:
 Subject Property 

FIGURE 3: TOPOGRAPHIC MAP
 Project No. 20-289531.1



APPENDIX A: SITE PHOTOGRAPHS



1. View of the subject property facing northwest along West Broadway.



2. View of pad-mounted transformers.



3. View of an additional pad-mounted transformer.



4. View of the classroom building within the southeastern corner of the parcel



5. View of the Main Office Building.



6. Additional view of the Main Office Building.



7. View of the a classroom building.



8. View of the Faculty Office Building.



9. View of the Multi-Purpose Building.



10. View of concrete-paved walkways and associated landscaping.



11. View of the western property boundary facing north.



12. View of HVAC units.



13. View of the asphalt-paved parking lot.



14. View of the commercial dumpsters.



15. View of the landscaped field.



16. View of the basketball and tennis courts.



17. View of a restroom.



18. View of a restroom.



19. View of a restroom.



20. View of a classroom.



21. View of a classroom.



22. View of a lab classroom.



23. View of a classroom.



24. View of a classroom.



25. View of the main office space.



26. View of the library.



27. View of general office space.



28. View of general office space.



29. View of a floor drain. In the Main Office Building.



30. View of general office space.



31. View of general office space.



32. View of the Faculty Lounge.



33. View of a breakroom.



34. View of the auditorium.



35. View of the food-preparation area.



36. View of a locker room.



37. View of a locker room.



38. View of popcorn ceiling.



39. View of ceiling tiles.



40. View of the adjacent single-family residences to the west.



41. View of additional adjacent single-family residences to the west.



42. View of the adjacent single-family residences to the north.



43. View of the adjacent multi-family complex to the east.



44. View of the adjacent multi-family complex to the northeast.

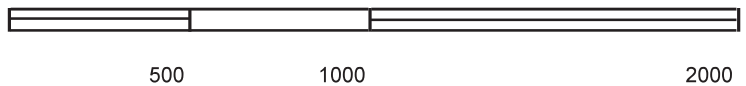
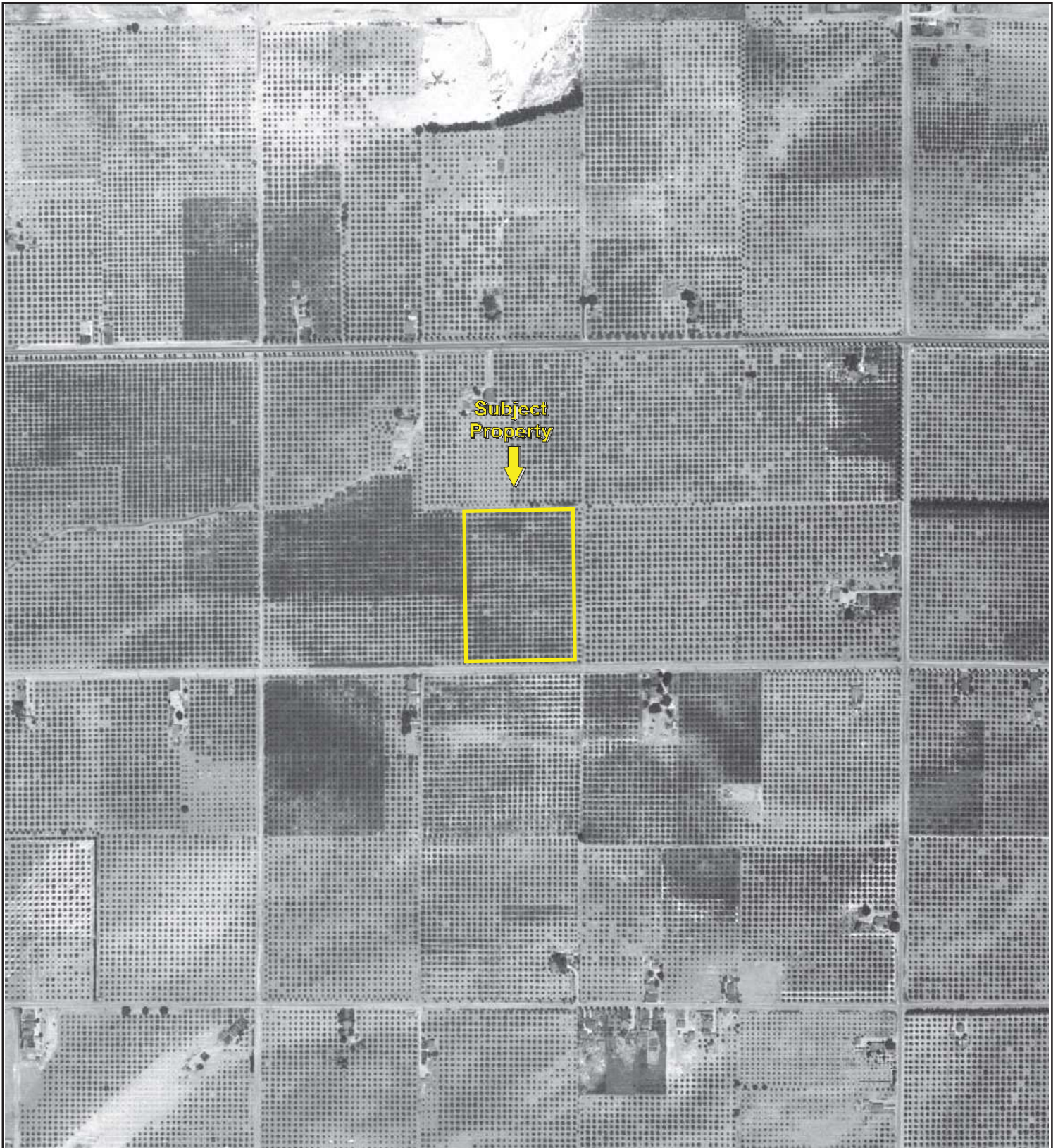


45. View of adjacent single-family residences to the south.



46. View of additional single-family residences to the south.

APPENDIX B: HISTORICAL/REGULATORY DOCUMENTATION



Key: Subject Property 



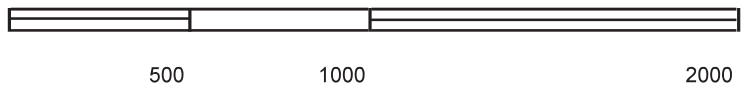
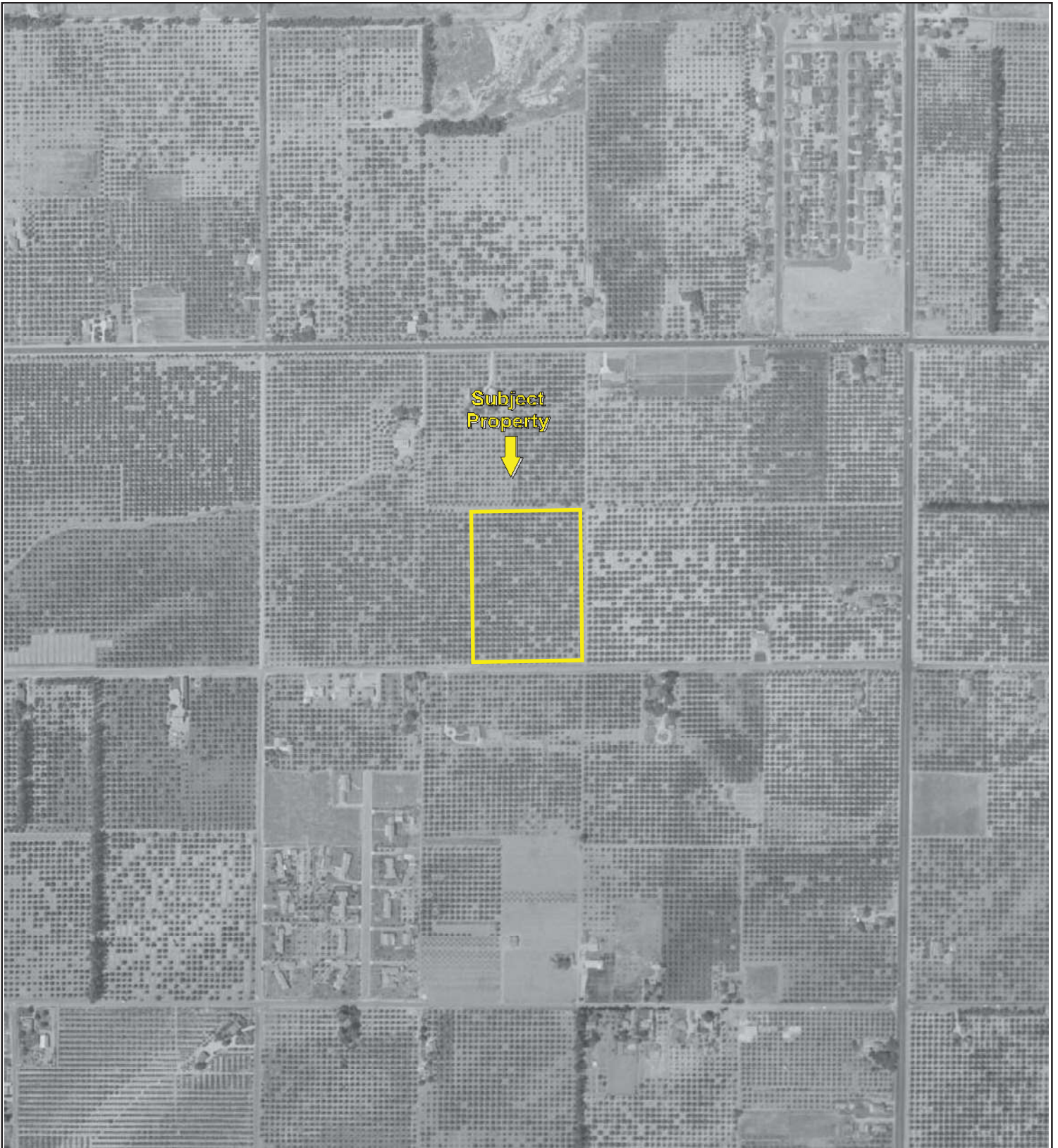
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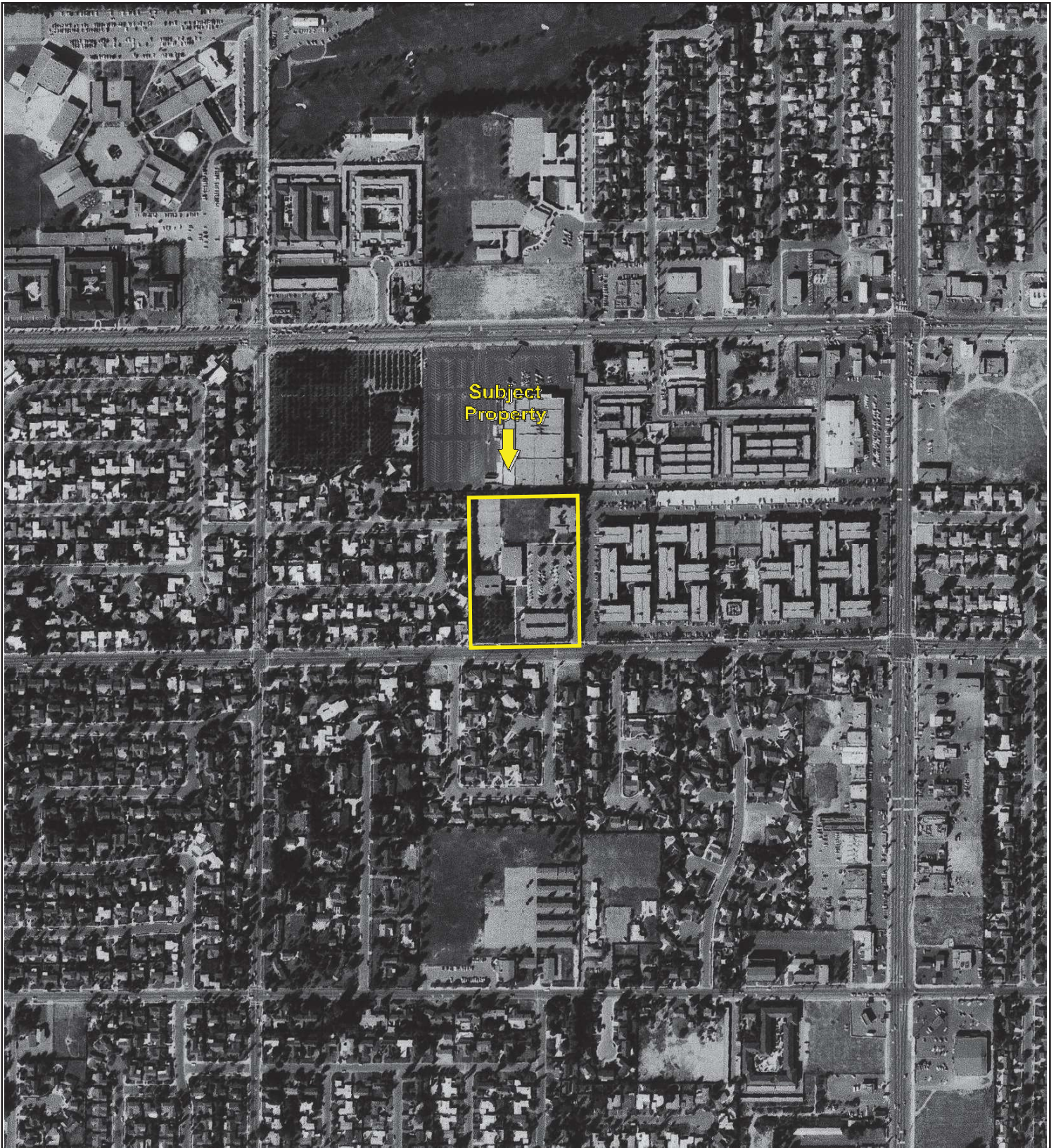


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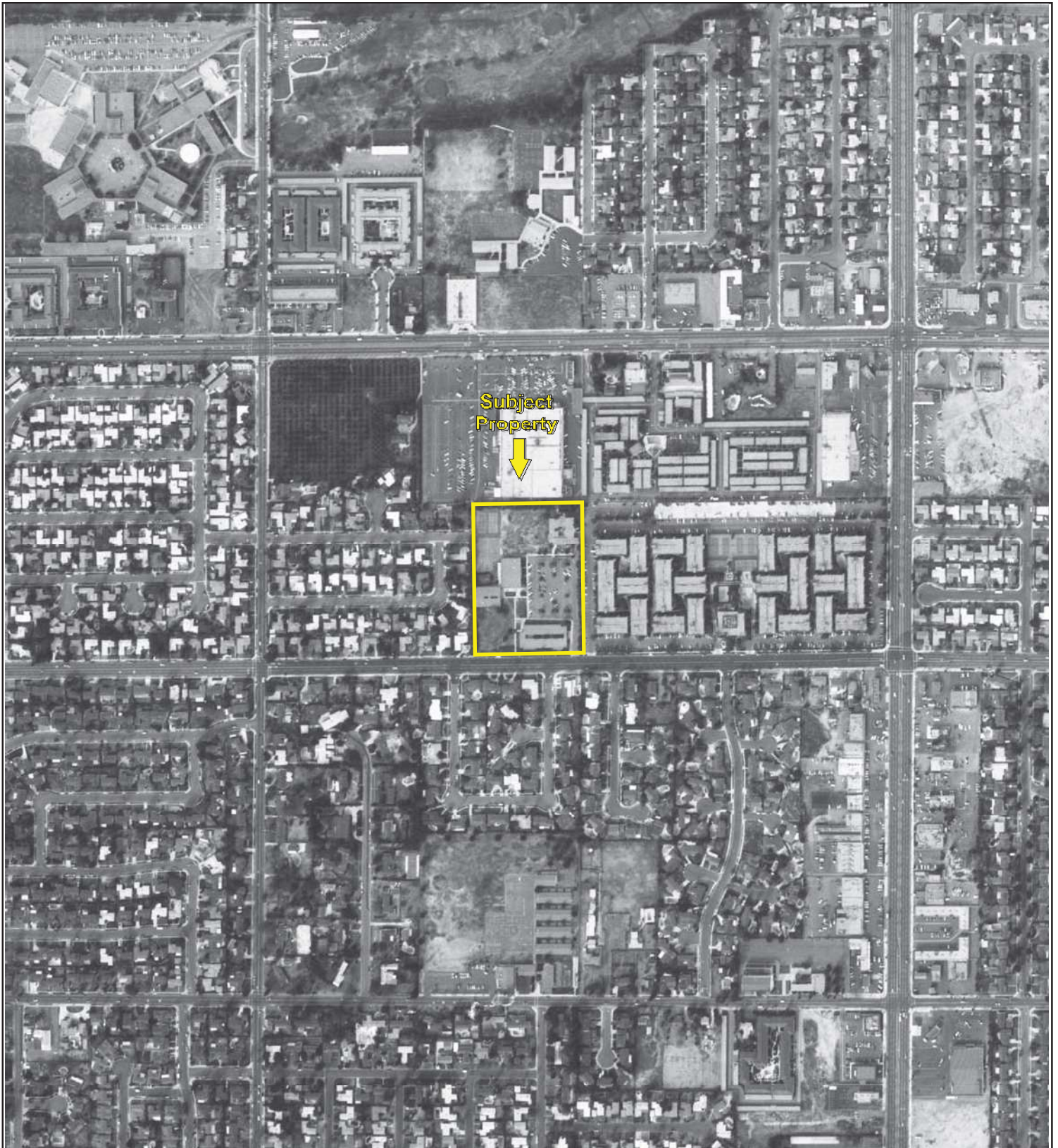


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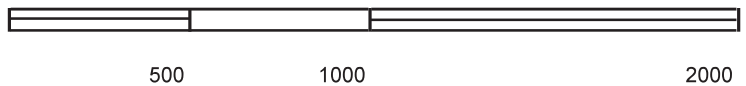
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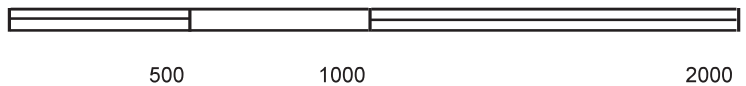
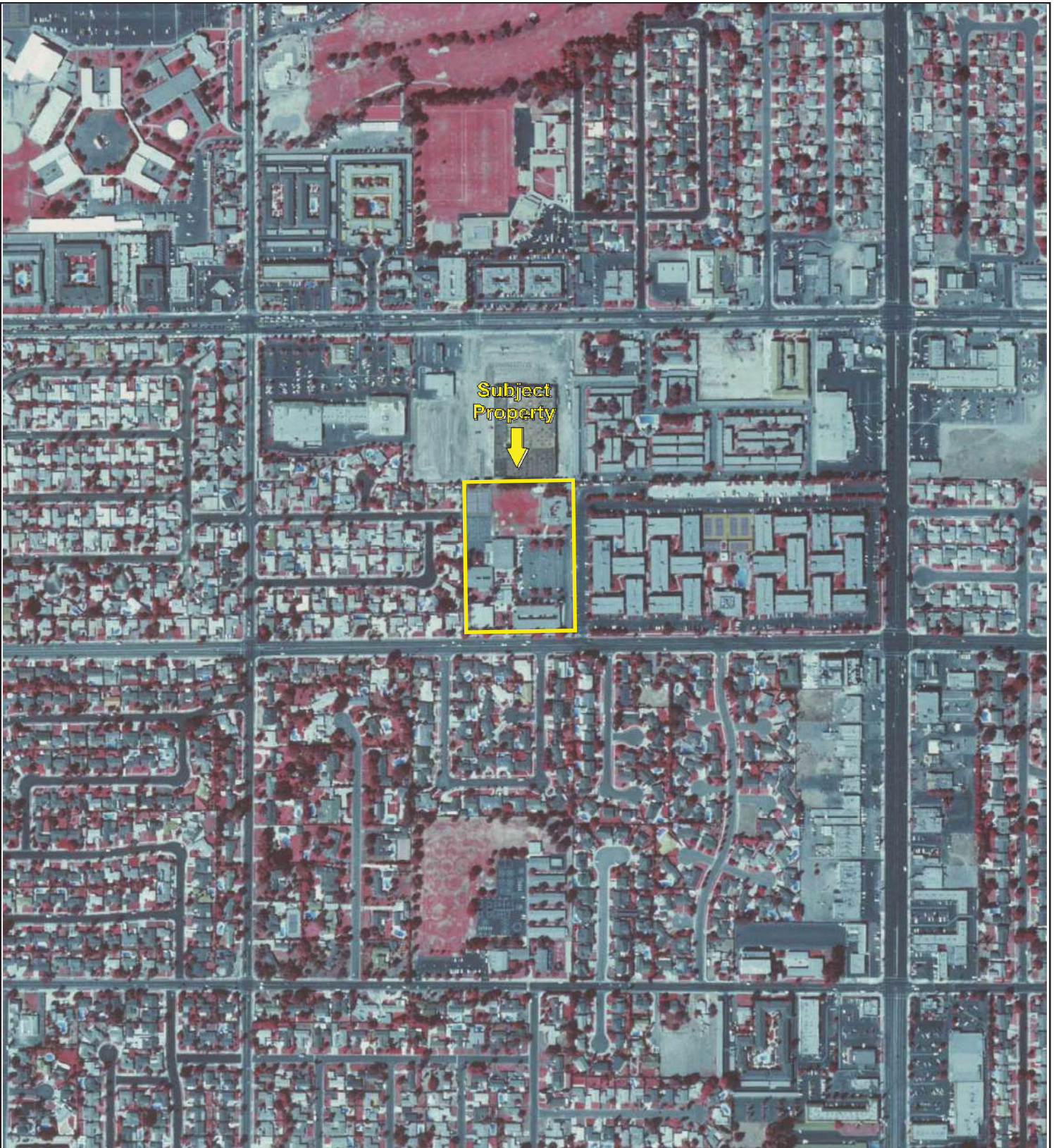
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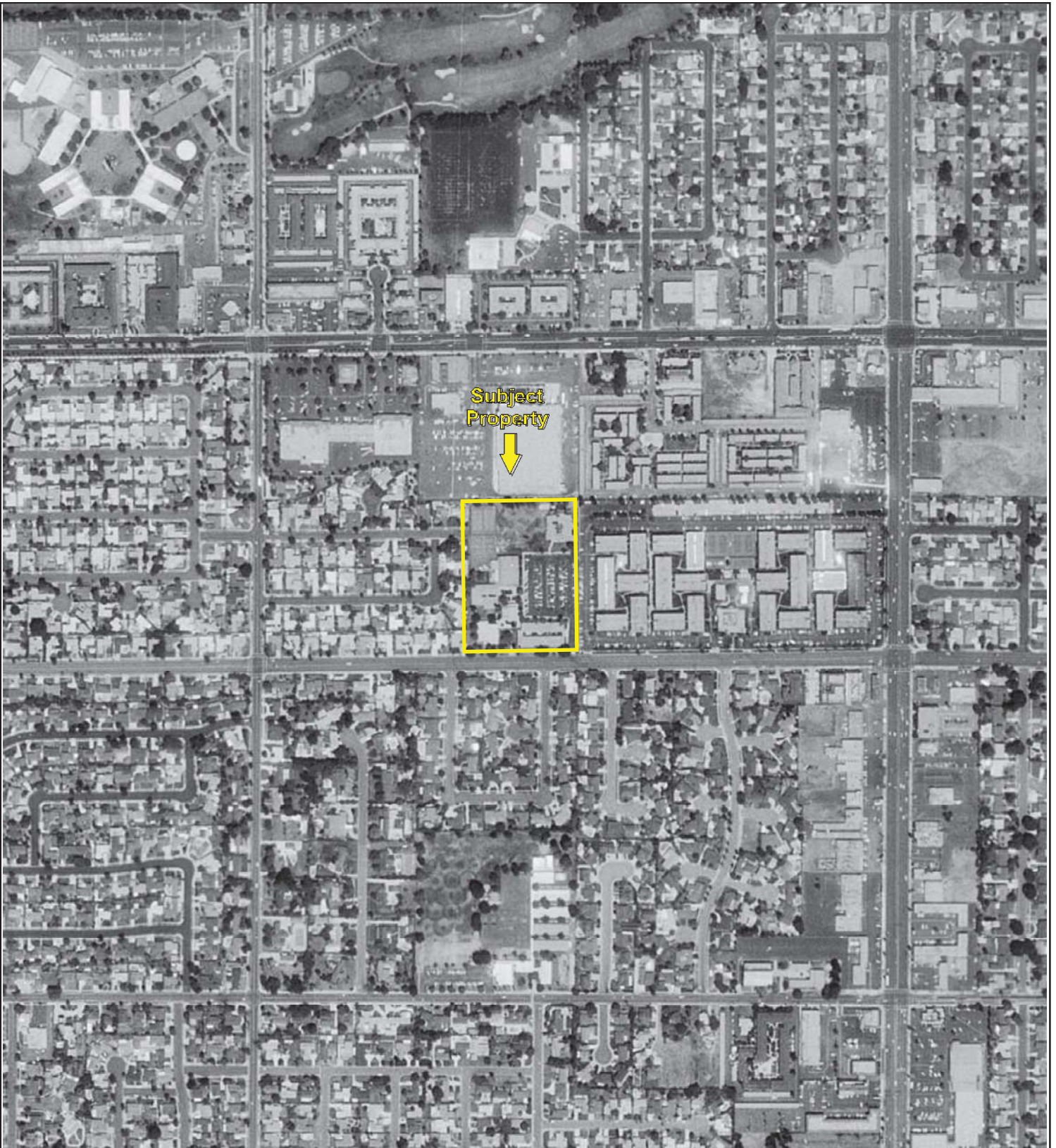
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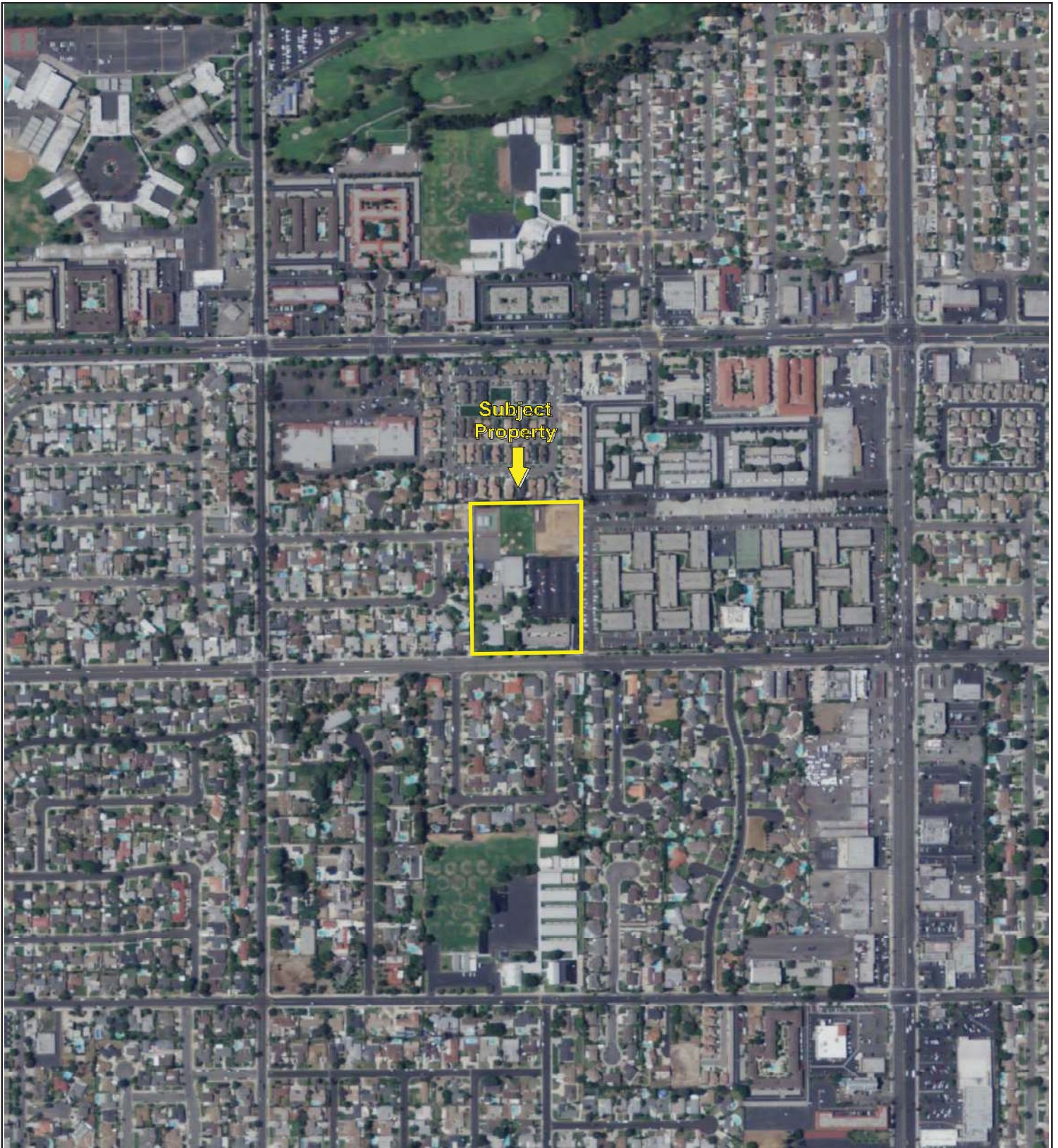
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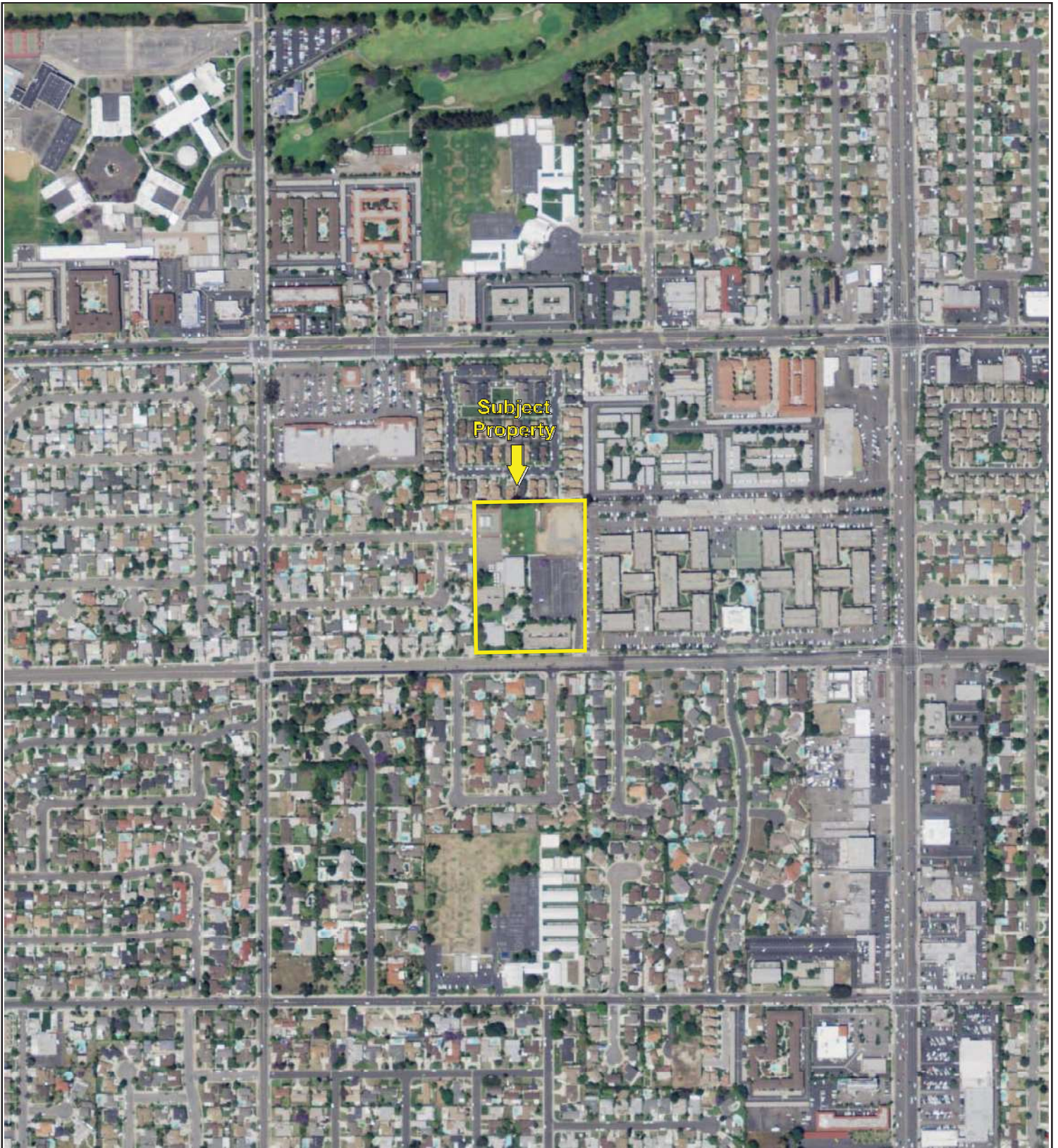
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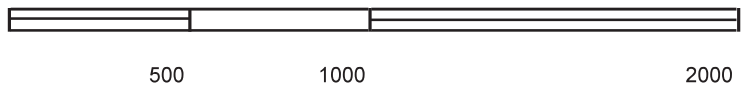
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Key: Subject Property 



Key: Subject Property 

Row Townhomes
2323 W Broadway
ANAHEIM, CA 92804

Inquiry Number: 6184296.3

September 09, 2020

Certified Sanborn® Map Report



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