



**APN 3204-004-024, Phase I
Environmental Site Assessment**

70th Street W and Avenue L,
City of Lancaster, County of Los
Angeles

October 20, 2023

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Sign-off Sheet and Signatures of Environmental Professionals

This document entitled Phase I Environmental Site Assessment (Report) was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of KB Home Southern California (the "Client"). The conclusions in the Report are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

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

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Abbreviations

AAI	All Appropriate Inquiries
ACM	Asbestos-containing material
AST	Aboveground Storage Tank
ASTM	ASTM International
AUL	Activity Use Limitation
BER	Business Environmental Risk
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulation
CREC	Controlled Recognized Environmental Conditions
ELUC	Environmental Land Use Control
EP	Environmental Professional
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
ft amsl	Feet above mean sea level
HREC	Historical Recognized Environmental Conditions
LBP	Lead-based paint
LUST	Leaking Underground Storage Tank
NESHAP	National Emissions Standard for Hazardous Air Pollutants
PCBs	Polychlorinated Biphenyls
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Conditions
USGS	United States Geological Survey
UST	Underground Storage Tank
VEC	Vapor Encroachment Condition
VOCs	Volatile Organic Compounds



Executive Summary
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1.0 EXECUTIVE SUMMARY

Stantec Consulting Services Inc. (Stantec) has completed a Phase I Environmental Site Assessment (ESA) report of the property located southeast of the intersection of 70th Street W and Avenue L, City of Lancaster, County of Los Angeles, California (the “Subject Property”), on behalf of KB Home Southern California (the “Client”). The work was performed according to Stantec’s proposal dated July 24, 2023, and accepted by the Client the same date. KB Home Southern California (the “User”) has been designated as the User of this report. The intended use of this Phase I ESA is for: due diligence in support of acquisition for development as residential.

The Phase I ESA was conducted in conformance with the requirements of ASTM International (ASTM) Designation E1527-21, and All Appropriate Inquiries (AAI) as defined by the United States Environmental Protection Agency (EPA) in Title 40 of the Code of Federal Regulations, Part 312 (40 CFR 312), except as may have been modified by the scope of work, and terms and conditions, requested by the Client. Any exceptions to, or deletions from, the ASTM or AAI practice are described in Section 2.3.

The Subject Property consists of approximately 17.8 acres of vacant land. The Assessor Parcel Number (APN) associated with the Subject Property is 3204-004-024. Adjoining properties, as well as the nearby area, consists of primarily residential structures and vacant land. According to the environmental database report, power transmission lines are located adjacent to the north and west along the roadways. A Subject Property Location Map is provided as Figure 1. A Subject Property Vicinity Map illustrating the main features of the Subject Property and vicinity is provided as Figure 2. Photographs taken during the site reconnaissance visit are provided in Appendix A.

According to review of historical documents including aerial photographs and topographic maps, the Subject Property may have been utilized for dry land farming in the 1940s. However, no crop rows or evidence of the former use of pesticides or herbicides was observed. Residential development of the nearby parcels begun in the 2000s.

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-21 of 70th Street W and Avenue L, City of Lancaster, County of Los Angeles, California, or the “Subject Property”. Any exceptions to, or deletions from, this practice are described in Section 2.3 of this report. This assessment has revealed no recognized environmental conditions (RECs), Controlled RECs (CRECs), or significant data gaps in connection with the Subject Property. No further investigation appears to be warranted at this time.

The preceding summary is intended for informational purposes only. Reading of the full body of this report is recommended.



2.0 INTRODUCTION

The objective of this Phase I ESA was to perform AAI into the past ownership and uses of the Subject Property consistent with good commercial or customary practice as outlined by ASTM International (ASTM) in “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process,” Designation E1527-21. “All Appropriate Inquiries” is the process for evaluating a property’s environmental conditions for the purpose of qualifying for landowner liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) following final rule of Part 312 of Title 40, Code of Federal Regulations (40 CFR Part 312). The purpose of this Phase I ESA was to identify, to the extent feasible, adverse environmental conditions including recognized environmental conditions (“RECs”) of the Subject Property.

The ASTM E1527-21 standard indicates that the goal of the Phase I ESA is to identify RECs, as well as historical recognized environmental conditions (“HRECs”) and controlled recognized environmental conditions (“CRECs”) that may exist at a property. The term “recognized environmental conditions” is defined as:

- 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.

ASTM defines a “HREC” as 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 and meets current unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (e.g., activity and use limitations or other property use limitations). A HREC is not considered a REC.

ASTM defines a “CREC” as 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 (e.g., as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), but with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., activity and use limitations, institutional controls, or engineering controls).

As defined by ASTM, RECs can include hazardous substances or petroleum products present under conditions in compliance with laws if that presence represents a material threat of future release. The release of hazardous substances or petroleum products is, however, not a REC if that presence is a *de minimis* condition. *De minimis* conditions are minor releases that generally do not present a material risk



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to human health and would not likely be subject to enforcement action if brought to the attention of governmental agencies. ASTM also considers the potential for a business environmental risk (BER), defined as a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of the Subject Property, not necessarily limited to those environmental issues required to be investigated by the ASTM standard. Consideration of BERs may involve addressing one or more ASTM non-scope considerations.

The work was performed according to Stantec's proposal dated March 15, 2023, and accepted by the Client the same date. The scope of work conducted during this Phase I ESA consisted of a visual reconnaissance of the Subject Property, interviews with key individuals, and review of reasonably ascertainable documents. The scope of work did not include an assessment for environmental regulatory compliance of any facility ever operated at the Subject Property (past or present), or sampling and analyzing of environmental media. Stantec was not contracted to perform an independent evaluation of the purchase or lease price of the Subject Property and its relationship to current fair market value. The conclusions presented in this Phase I ESA report are professional opinions based on data described herein. The opinions are subject to the limitations described in Section 2.3.

ASTM E1527-21 notes that the availability of record information varies from source to source. The User or Environmental Professional (EP) is not obligated to identify, obtain, or review every possible source that might exist with respect to a property. Instead, ASTM identifies record information that is reasonably ascertainable from standard sources. "Reasonably ascertainable" means:

1. Information that is publicly available;
2. Information that is obtainable from its source within reasonable time and cost constraints; and
3. Information that is practicably reviewable.

2.1 SUBJECT PROPERTY DESCRIPTION

The Subject Property consists of approximately 17.8 acres of vacant land. The Assessor Parcel Number (APN) associated with the Subject Property is 3204-004-024. Adjoining properties, as well as the nearby area, consists of primarily residential structures and vacant land. According to the environmental database report, power transmission lines are located adjacent to the north and west along the roadways. A Subject Property Location Map is provided as Figure 1. A Subject Property Vicinity Map illustrating the main features of the Subject Property and vicinity is provided as Figure 2. Photographs taken during the site reconnaissance visit are provided in Appendix A.

2.2 SPECIAL TERMS, CONDITIONS, AND ADDITIONAL ASSUMPTIONS

There were no special terms, conditions, or additional assumptions associated with this Phase I ESA.



2.3 EXCEPTIONS AND LIMITING CONDITIONS

This report documents work that was performed in accordance with generally accepted professional standards at the time and location in which the services were provided and given the schedule and budget constraints established by the client. No other representations, warranties, or guarantees are made concerning the accuracy or completeness of the data or conclusions contained within this report, including no assurance that this work has uncovered all potential and actual liabilities and conditions associated with the Subject Property.

This report provides an evaluation of selected environmental conditions associated with the Subject Property that was assessed at the time the work was conducted and is based on information obtained by and/or provided to Stantec at that time. There are no assurances regarding the accuracy and completeness of this information received from others.

Conclusions made within this report consist of Stantec's professional opinion as of the time of the writing of this report and are based solely on the scope of work described in the report, the limited data available, and the results of the work. They are not a certification of the Subject Property's environmental condition.

The client did not provide or contract Stantec to provide recorded title records or search results for environmental liens or activity and use limitations encumbering the property or in connection with the Subject Property. Stantec did not obtain historical records that document the property history in 5-year intervals, and this resulted in data gaps. Although this represents data gaps, these data gaps are not considered to impact the EPs ability to identify RECs unless stated as such. Based on the information obtained during the course of this ESA and general knowledge of development at and near the Subject Property, the absence of this information did not affect the ability of the EPs to identify RECs, HRECs, CRECs, or *de minimis* conditions.

This report has been prepared for the exclusive use of the client identified herein and any use of or reliance on this report by any third party is prohibited, except as may be consented to in writing by Stantec or as required by law. The provision of any such consent is at Stantec's sole and unfettered discretion and will only be authorized pursuant to the conditions of Stantec's standard form reliance letter. Stantec assumes no responsibility for losses, damages, liabilities, or claims, howsoever arising, from third party use of this report.

Project Specific limiting conditions are provided in Section 2.2.

The conclusions are based on the conditions encountered at the Subject Property by Stantec at the time the work was conducted.

As the purpose of this report is to identify Subject Property conditions which may pose an environmental risk; the identification of non-environmental risks to structures or people on the Subject Property is beyond the scope of this assessment.



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The findings, observations, and conclusions expressed by Stantec in this report are not an opinion concerning the compliance of any past or present owner or operator of the Subject Property which is the subject of this report with any Federal, state, provincial or local law or regulation.

This report presents professional opinions and findings of a scientific and technical nature. It does not and shall not be construed to offer a legal opinion or representations as to the requirements of, nor compliance with, environmental laws, rules, regulations, or policies of Federal, state, provincial or local governmental agencies.

Stantec specifically disclaims any responsibility to update the conclusions in this report if new or different information later becomes available or if the conditions or activities on the property subsequently change.

2.4 PERSONNEL QUALIFICATIONS

This Phase I ESA was conducted by, or under the supervision of, an individual that meets the ASTM definition of an EP. The credentials of the EP and other key Stantec personnel involved in conducting this Phase I ESA are provided in Appendix B.



User-Provided Information
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3.0 USER-PROVIDED INFORMATION

ASTM E1527-21 describe responsibilities of the User to complete certain tasks in connection with the performance of “All Appropriate Inquiries” into the Subject Property. The ASTM standard requires that the EP request information from the User on the results of those tasks because that information can assist in the identification of RECs, CRECs, HRECs, or *de minimis* conditions in connection with the Subject Property. Towards that end, Stantec requested that the User provide the following documents and information:

Description of Information	Provided (Yes / No)	Description and/or Key Findings
User Questionnaire and/or Interview	Yes	The user is not aware of any environmental cleanup liens and/or activity land use limitations associated with the Subject Property. Additionally, the user is not aware of any past uses, chemicals, petroleum, or other hazardous substances currently or formerly on the Subject Property.
Environmental Liens or Activity and Use Limitations (AUL)	N/A	No environmental liens and/or activity and use limitations (AULs) were identified in the Preliminary Title Report prepared by First American Title Company dated January 31, 2023. No other Land title records, deeds, environmental liens, and activity and use limitation documentation were provided by the User, and public records were not searched by Stantec.
Previous Environmental Permits or Reports Provided by User	No	The user reportedly does not possess any of these documents. Therefore, no reports or permits were provided for review.
Purpose of the Phase I ESA	N/A	The intended use of the Phase I is for due diligence in support of new residential development.

Stantec forwarded the ASTM recommended User Questionnaire to Mr. Jake Persons, VP Forward Planning at KB Home. The completed User Questionnaire returned to us by Mr. Persons and dated May 2, 2023, is included in Appendix C.



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4.0 RECORDS REVIEW

The objective of consulting historical sources of information is to develop the history of the Subject Property and surrounding area and evaluate if past uses may have resulted in RECs. Physical setting records are evaluated to determine if the physical setting may have contributed to adverse environmental conditions in connection with the Subject Property. During the review of historical records, Stantec attempted to identify uses of the Subject Property from the present to the first developed use of the Subject Property. Stantec’s research included the reasonably ascertainable and useful records described in this section.

4.1 PHYSICAL SETTING

A summary of the physical setting of the Subject Property is provided in the table below with additional details in the following subsections:

Topography:	The Subject Property is at an elevation of 2,454 feet above mean sea level (msl). The regional topographic gradient is relatively flat with a slight gradient towards the north-northeast (EDR, 2023).
Soil/Bedrock Data:	The vicinity of the Subject Property is underlain by sandy loams characterized by granular materials of silty or clayey gravel and sand with slow infiltration rates.
Estimated Depth to Groundwater/ Estimated Direction of Gradient:	According to periodic groundwater data managed by the California Department of Water Resources (DWRs) SGMA Data viewer, a nearby groundwater well (State well number 007N013W33A001S) is located approximately ¼ mile to the northwest. Based on data from this well, groundwater at approximately 387.80 feet below ground surface (bgs) as of July 5, 1966, in the vicinity of the Subject Property (EDR, 2023).
<p>NOTE: Site-specific groundwater flow direction and depth can only be determined by conducting site-specific testing, which Stantec has not conducted.</p>	

4.1.1 Subject Property Topography and Surface Water Flow

The Subject Property is at an elevation of approximately 2,454 feet above mean sea level (msl). The Subject Property topographic gradient is relatively flat with a slight gradient towards the north-northeast (USGS Lancaster West 7.5-minute map, 2012). As surface water flows over the surface, the water is expected to travel to the northeast and infiltrates the ground surface or flows overland towards main roads.



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4.1.2 Regional and Subject Property Geology

The Subject Property is located in the northern portion of Los Angeles County in the Antelope Valley, City of Lancaster, California. The area is located in the western portion of the Mojave Desert Geomorphic Province bounded to the south by the Transverse Ranges. The stratigraphy underlying the Subject Property consists primarily of recent-age alluvium (CDMG, 1962).

According to official maps of California, the Subject Property is not located within an Alquist-Priolo (AP) Earthquake Fault Zone Boundary.

The vicinity of the Subject Property is underlain by sandy loams characterized by granular materials of silty or clayey gravel and sand with slow infiltration rates (EDR, 2023).

4.1.3 Regional and Subject Property Hydrogeology

The Subject Property is located within the Antelope Valley Groundwater Basin in northern Los Angeles County. This basin includes cities such as Palmdale to the southeast, Rosamond to the north, and Neenach to the northwest. The basin is bounded by the Transverse Mountain range to the south, the Tehachapi mountains to the north and northwest and the San Gabriel Mountains to the southwest.

According to periodic groundwater data managed by the California Department of Water Resources (DWRs) SGMA Data viewer, a nearby groundwater well (State well number 007N013W33A001S) is located approximately ¼ mile to the northwest. Based on data from this well, groundwater at approximately 387.80 feet below ground surface (bgs) as of July 5, 1966, in the vicinity of the Subject Property (EDR, 2023).

4.2 FEDERAL, STATE AND TRIBAL ENVIRONMENTAL RECORDS

A regulatory agency database search report was obtained from Environmental Data Resources, Inc. (EDR), a third-party environmental database search firm. A complete copy of the database search report, including the date the report was prepared, the date the information was last updated, and the definition of databases searched, is provided in Appendix D.

Stantec evaluated the information listed within the database relative to potential impact to the Subject Property, assessing the potential for impacts based in part on the physical setting. As part of this process, inferences have been made regarding the likely groundwater flow direction at or near the Subject Property. As described in 4.1.3, the inferred shallow groundwater flow direction is likely to be in the northeast direction. Observations about the Subject Property and adjoining properties made during the Subject Property reconnaissance are provided in more detail in Section 5.

4.2.1 Listings for Subject Property

The Subject Property was not identified in the environmental database report.



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4.2.2 Listings for Adjoining and Nearby Sites with Potential to Impact Subject Property

Stantec assessed data presented in the environmental agency database search report to evaluate the potential for conditions on adjoining and nearby sites to pose a REC, CREC, or HREC for the Subject Property. The evaluation included an opinion of the potential for contamination by hazardous substances or petroleum products to migrate to the Subject Property from an adjoining or nearby site, including by vapor migration or encroachment (i.e., potential for a vapor encroachment condition [VEC]. ASTM E2600-22 Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions (ASTM, 2022) was used as the basis for a Tier I Vapor Encroachment Screen (VES) for the Subject Property. This included evaluation of release sites within 1/10 mile for Petroleum Hydrocarbon releases, and 1/3 mile for volatile and semi-volatile organic compound (VOC, SVOC), plus other potential vapor phase contaminants (such as mercury).

Based on this evaluation, the following individual facilities were identified as the most likely potential sources of impact to the Subject Property. The basis for why each of the following listed databases creates a REC for the Subject Property is also provided.

Listed Facility Name/Address	Database Listing(s)	Distance/Direction from Subject Property
Goode, Lawrence & Gerald 6510 W Avenue L Lancaster, CA 93536	HIST CORTESE, HIST UST; ENF; LOS ANGELES CO. HMS	Approximately 1,090 feet to the east-northeast
The facility is listed as having one 1,000-gallon gasoline underground storage tank installed in 1980. The facility received a cease and desist order dated May 10, 1991. No additional information or evidence of a release was provided in the EDR report or available online. Given there is no indication of a release, distance to the Subject Property, and the anticipated depth to groundwater is greater than 100 feet bgs, this facility is not considered a REC and no further assessment is warranted.		

The remaining listings in the database search report, including listings of Orphan/Unlocated Sites, provided in Appendix D do not constitute a REC for the Subject Property.

4.3 LOCAL/REGIONAL ENVIRONMENTAL RECORDS

Stantec checked the following sources to obtain information pertaining to Subject Property use and/or indications of RECs in connection with the Subject Property:

4.3.1 Antelope Valley Fire Department

Agency Name Contact Information	Finding
Antelope Valley Fire Department Fire Station #129	Stantec submitted a request to the Antelope Valley Fire Department on April 12, 2023. As of the writing of this report, no response has been received by Stantec. Should any



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Agency Name Contact Information	Finding
42110 6th Street West Lancaster, CA 93534 Submitted on April 12, 2023	information be received that changes the conclusions or recommendations of this report, Stantec will issue an addendum. However, based on its review of other sources, Stantec considers it unlikely that any records from this agency would alter the conclusions or recommendations of this report. The lack of this information does not represent a significant data gap.

4.3.2 City of Lancaster Building Planning Department Records

Agency Name Contact Information	Findings
Lancaster City Hall 44933 Fern Avenue Lancaster, CA 93534 Submitted on April 12, 2023	Stantec submitted a request to Lancaster City Hall on April 12, 2023. As of the writing of this report, no response has been received by Stantec. Should any information be received that changes the conclusions or recommendations of this report, Stantec will issue an addendum. However, based on its review of other sources, Stantec considers it unlikely that any records from this agency would alter the conclusions or recommendations of this report. The lack of this information does not represent a significant data gap.

4.3.3 Los Angeles Department of Public Health

Agency Name Contact Information	Finding
Los Angeles County Department of Public Health 5555 Ferguson Drive, Suite 120-04 Commerce, CA 90022 323-914-7806 phicor@ph.lacounty.gov Submitted on April 12, 2023	Stantec submitted a request to the Los Angeles County Public Department of Public Health on April 12, 2023. As of the writing of this report, no response has been received by Stantec. Should any information be received that changes the conclusions or recommendations of this report, Stantec will issue an addendum. However, based on its review of other sources, Stantec considers it unlikely that any records from this agency would alter the conclusions or recommendations of this report. The lack of this information does not represent a significant data gap.

4.3.4 State Department Records

Agency Name Contact Information	Finding
California Regional Water Quality Control Board, Lahontan Region (760) 241-6583	Stantec researched Geotracker, the California Regional Water Quality Control Board public database, to evaluate if there are any reported



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<p>Online database: https://geotracker.waterboards.ca.gov Submitted and accessed on April 12, 2023</p>	<p>releases at the Subject Property or on adjacent properties. There were no release sites listed for the Subject Property or adjoining properties.</p> <p>Additionally, according to an email dated April 19, 2023, from Ms. Silvia Flores, Scientific Aid with the Lahontan Regional Water Quality Control Board, there are no current or historical records for the Subject Property.</p>
<p>Department of Toxic Substances Control (DTSC), Envirostor database Online database: https://www.envirostor.dtsc.ca.gov/public/ Submitted and accessed on April 12, 2023</p>	<p>Stantec researched Envirostor, the DTSC public database, to evaluate if there are any reported releases at the Property or on adjacent properties. There were no release sites listed for the Subject Property or the adjacent properties within a 1/8-mile radius.</p> <p>Additionally, according to letter dated April 12, 2023, from Jone Barrio, Regional Records Coordinator, there are no records for the Subject Property or adjoining properties.</p>
<p>California Geologic Energy Management (CalGEM) Online database: https://maps.conservation.ca.gov/doggr/wellfinder Accessed: May 2, 2023</p>	<p>The California Department of Conservation Geologic Energy Management Division (CalGEM) database was searched to identify the potential existence of oil and gas production wells within the vicinity of the Subject Property. No oil or gas wells were located within the Subject Property boundaries. The closest well is located approximately 3,300 feet to the northeast and is listed as plugged dry hole (API 0403705296). Therefore, this well is not considered a REC for the Subject Property.</p>

4.4 HISTORICAL RECORDS REVIEW

4.4.1 Land Title Records/Deeds

No environmental liens and/or activity and use limitations (AULs) were identified in the Preliminary Title Report prepared by First American Title Company dated January 31, 2023. No other land title records, deeds, environmental liens, and activity and use limitation documentation were provided by the User, and public records were not searched by Stantec.

4.4.2 Aerial Photographs

Stantec reviewed historical aerial photographs provided by EDR. The general type of activity on a property and land use changes can often be discerned from the type and layout of structures visible in the photographs. However, specific elements of a facility's operation usually cannot be discerned from aerial



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photographs alone. The following table summarizes Stantec’s observations of the reviewed historical aerial photographs. Copies of the historical aerial photographs are provided in Appendix E.

Year	Scale	Observations of Subject Property and Adjoining/Nearby Properties
1928	1=500'	The Subject Property and adjoining land appear to be vacant land. Roadways appear adjacent to the north and west.
1940	1=500'	The Subject Property and surrounding area appear similar to the previous photograph. Agricultural land appears approximately 500 feet to the north.
1948	1=500'	The Subject Property and surrounding area appear to be possibly used for dry land farming. No evidence of row crops, pesticides, or herbicides is observed. Row crops appear to the north beyond the roadway.
1953	1=500'	The Subject Property and surrounding area appear similar to the previous photograph. A small structure appears approximately 250 feet to the east.
1968 1974 1987 1989	1=500'	The Subject Property and surrounding area appear similar to the previous photograph. Additional small structures appear to the west beyond the roadway.
1994 2002	1=500'	The Subject Property and adjoining properties remain vacant land. Residential development appears approximately 750 feet to the south.
2005	1=500'	The Subject Property and adjoining properties remain vacant land. A dirt track appears adjacent to the southeast beyond which is a graded lot in preparation for residential development.
2009	1=500'	The northwestern corner of the Subject Property appears to have miscellaneous debris and a dirt road. The remainder of the Subject Property and adjoining properties to the east and south remain vacant land with dirt pathways. Residential development appears to the west, south, and east.
2012 2016 2020	1=500'	The Subject Property remains vacant land. The adjoining properties to the east and south also remain vacant land. An increase in residential development appears to the west, east, and south. Vacant former agricultural land appears to the north beyond the roadway.

Name of aerial photograph source: EDR, 2023

No RECs were noted during the review of the historical aerial photographs.

4.4.3 City Directories

Stantec retained a third party to research available city directories for the Subject Property and adjoining and nearby properties, in approximately five-year intervals. Copies of the city directory listings are provided in Appendix E. Listings for the surrounding area consists of residential, the Good Shepherd Catholic Cemetery, and various schools/school districts. No RECs were noted during the review of the City Directories.



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4.4.4 Historical Fire Insurance Maps

Fire insurance maps were developed for use by insurance companies to depict facilities, properties, and their uses for many locations throughout the United States. These maps provide information on the history of prior land use and are useful in assessing whether there may be potential environmental contamination on or near the Subject Property. These maps, which have been periodically updated since the late 19th century, often provide valuable insight into historical Subject Property and adjoining and nearby property uses.

Stantec requested fire insurance maps from EDR; however, no coverage exists for the Subject Property. The Sanborn® Map Search Report indicating “no coverage” is presented in Appendix E.

4.4.5 Historical Topographic Maps

Stantec reviewed historical USGS 7.5-minute Topographic Maps of the Del Sur, Lancaster West, and Bouquet Reservoir, California Quadrangles (scale 1:24,000) to help identify past Subject Property and adjoining and nearby property usage and areas of potential environmental concern. Copies of the historical maps are provided in Appendix E.

The following table summarizes the maps reviewed and our observations.

Year	Scale	Observations of Subject Property and Adjoining/Nearby Properties
1915 1917 1931	1=96,000 1=125,000 1=24,000	No site details are depicted on the Subject Property or surrounding area. Roadways appear adjacent to the north and west.
1936 1958	1=24,000	No site details are depicted on the Subject Property. Wells and a small water feature appear to the north beyond Avenue L.
1974 1987 1995	1=50,000 1=24,000	No site details are depicted on the Subject Property. A High School appears approximately ¾ mile to the east along Avenue L. Residential development appears approximately to the ¾ mile to the south.
2012 2015 2018	1=24,000	No details are depicted. Roadways appear in their current configuration.

Name of maps and source: EDR, 2023

No RECs were noted during the review of the topographic maps.

4.4.6 Other Historical Sources

No other historical sources were researched.



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5.0 SITE RECONNAISSANCE

A visit to the Subject Property and its vicinity was conducted by Mr. Jim DeWoody, Principal Scientist with Stantec on April 28, 2023. Access to the Subject Property was provided by Mr. Jake Persons with KB Home. Stantec was unaccompanied during the Subject Property visit. Figure 2 provides information about the Subject Property and adjoining sites and the location of potential areas of environmental concern. Detailed Subject Property features are provided on Figure 2. Photographs collected during the site reconnaissance are included in Appendix A.

5.1 SITE RECONNAISSANCE METHODOLOGY

The site reconnaissance focused on observation of current conditions and observable indications of past uses and conditions of the Subject Property that may indicate the presence of RECs. The reconnaissance of the Property was conducted on foot and Stantec utilized the following methodology to observe the Property:

- Traverse the outer Subject Property boundary
- Traverse transects across the Subject Property
- Traverse the periphery of all structures on the Subject Property

Weather conditions during the visit to the Subject Property were clear and sunny. There were no weather-related Subject Property access restrictions encountered during the reconnaissance visit.

5.2 GENERAL DESCRIPTION

Subject Property and Area Description:	The Subject Property is located southeast of the intersection of 70 th Street W and Avenue L, City of Lancaster, County of Los Angeles, California. The surrounding area consists of vacant land and residential properties.
Subject Property Operations:	The Subject Property is currently a vacant lot.
Structures, Roads, Other Improvements:	None observed.
Subject Property Size (acres):	Approximately 17.8 acres
Estimated % of Subject Property Covered by Buildings and/or Pavement:	0%
Observed Current Subject Property Use/Operations:	Vacant land.
Observed Evidence of Past Subject Property Use(s):	None observed.



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Sewage Disposal Method (and age):	None observed.
Potable Water Source:	None observed.
Electric and Natural Gas Utilities:	None observed.

5.3 HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS

The following table summarizes Stantec’s observations during the Subject Property reconnaissance.

Observations	Description/Location
Hazardous Substances and Petroleum Products as Defined by CERCLA 42 U.S.C. § 9601(14) with identified uses:	None observed.
Drums/Totes/Intermediate Bulk Containers (≥ 5 gallons):	None observed.
Strong, Pungent, or Noxious Odors:	None detected.
Pools of Liquid:	None observed.
Unidentified Substance Containers:	None observed.
Polychlorinated biphenyl (PCB)-Containing Equipment:	None observed.
Other Observed Evidence of Hazardous Substances or Petroleum Products:	None observed.

5.4 INTERIOR OBSERVATIONS

Given there are no structures on the Subject Property this section is not applicable.

5.5 EXTERIOR OBSERVATIONS

Stantec made the following observations during the site reconnaissance of exterior areas of the Subject Property and/or identified the following information during the interview or records review portions of the assessment:

Observations	Description
On-site Pits, Ponds, or Lagoons:	None observed.
Stained Soil or Pavement:	None observed.
Stressed Vegetation:	None observed.



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Observations	Description
Waste Streams and Waste Collection Areas:	No waste streams or waste collection areas were observed.
Solid Waste Disposal:	None observed.
Potential Areas of Fill Placement:	None observed.
Wastewater:	No exterior wastewater discharge was observed.
Stormwater:	Stormwater is expected to infiltrate the exposed surface or flow overland to the adjacent roadways.
Wells:	No wells were observed.
Septic Systems:	No visible evidence of the existence of a septic system was observed.
Other Exterior Observations:	None observed.

5.6 UNDERGROUND STORAGE TANKS/STRUCTURES

Existing USTs:	No visible evidence (fill pipes, vent pipes, dispensers, surface patches), which would indicate the presence of USTs, was discovered during the site reconnaissance.
Former USTs:	No visible evidence (fill pipes, vent pipes, dispensers, surface patches), reports, or other evidence of the former presence of USTs was discovered during this Phase I ESA.
Other Underground Structures:	None observed.

5.7 ABOVEGROUND STORAGE TANKS

Existing ASTs:	No visible evidence (fill pipes, vent pipes, dispensers, surface stains), which would indicate the presence of ASTs, was discovered during the site reconnaissance.
Former ASTs:	No visible evidence (fill pipes, vent pipes, dispensers, surface stains), reports, or other evidence of the former presence of ASTs was discovered during this Phase I ESA.

5.8 ADJOINING PROPERTIES

5.8.1 Current Uses of Adjoining Properties

As viewed from the Subject Property and/or from public rights-of-way, Stantec made the following observations about use and activities on adjoining sites:

NORTH	Avenue L beyond which is vacant land.
WEST	70 TH Street W beyond which is residential.



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SOUTH	Vacant land.
EAST	Vacant land.

5.8.2 Observed Evidence of Past Uses of Adjoining Properties

Observations of adjoining sites providing indications of past use and activities, if any, are described below.

NORTH	None observed.
EAST	None observed.
SOUTH	None observed.
WEST	None observed.

5.8.3 Pits, Ponds or Lagoons on Adjoining Properties

As viewed from the Subject Property and/or from public rights-of-way, Stantec made the following observations about the presence of pits, ponds, and lagoons on adjoining sites:

NORTH	None observed.
EAST	None observed.
SOUTH	None observed.
WEST	None observed.

5.9 OBSERVED PHYSICAL SETTING

Topography of the Subject Property and Surrounding Area:	The Subject Property is relatively flat. The regional topographic gradient is relatively flat with a slight gradient towards the north-northeast.
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6.0 EVALUATION

This section provides a summary overview of or Findings, Opinions, and Conclusions.

6.1 FINDINGS AND OPINIONS

Information gathered from interviews, reviews of existing data, and an inspection was evaluated to determine if RECs are present in connection with the Subject Property. Based on this information, Stantec made the following findings and developed the following opinions.

- The Subject Property consists of approximately 17.8 acres of vacant land. The Assessor Parcel Number (APN) associated with the Subject Property is 3204-004-024. Adjoining properties, as well as the nearby area, consists of primarily residential structures and vacant land. According to the environmental database report, power transmission lines are located adjacent to the north and west along the roadways. According to review of historical documents including aerial photographs and topographic maps, the Subject Property may have been utilized for dry land farming in the 1940s. However, no crop rows or evidence of the former use of pesticides or herbicides was observed. Residential development of the nearby parcels begun in the 2000s.

The site reconnaissance and review of historical documents identified no RECs, CRECs, HRECs or *de minimis* conditions at or near the Subject Property.

- An environmental records search was performed and identified sites within their respective ASTM E1527-21 search radii of the Subject Property that may represent RECs, CRECs, HRECs, or *de minimis* conditions.

Based on one or more of the following reasons: distance from the Subject Property, position of sites with respect to assumed groundwater flow direction, the type of native soils, and regulatory status, none of the sites identified in the environmental records search report are expected to impact soil or groundwater quality at the Subject Property. The environmental records search identified no RECs, CRECs, HRECs or *de minimis* conditions at or near the Subject Property.

6.2 DATA GAPS

The federal AAI final rule [40 CFR 312.10(a)] and ASTM E1527-21 identify a “data gap” as the lack or inability to obtain information required by the standards and practices of the rule despite good faith efforts by the EP or the User.

Any data gaps resulting from the Phase I ESA described in this report are listed and discussed below.



APN 3204-004-024, PHASE I ENVIRONMENTAL SITE ASSESSMENT

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Gap	Discussion
Deletions or Exceptions from Scope of Work Referenced in Section 1.4:	None
Weather-Related Restrictions to Site Reconnaissance:	None
Facility Access Restrictions to Site Reconnaissance:	None
Other Site Reconnaissance Restrictions:	None
Data Gaps from Environmental Records Review:	As of the writing of this report, Stantec has not received a response from all of the regulatory agencies noted in section 4.3. Should any information be received that changes the conclusions or recommendations of this report, Stantec will issue an addendum. However, based on its review of other sources, Stantec considers it unlikely that any records from this agency would alter the conclusions or recommendations of this report. The lack of this information does not represent a significant data gap.
Data Gaps from Historical Records Review:	None
Data Gaps from Interviews:	Given the Property consists of vacant land, no on-site interview was performed. However, based historical documentation the lack of an on-site interview is not considered a significant data gap and does not impact the findings for this report.
Other Data Gaps:	None

6.3 CONCLUSIONS

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-21 of 70th Street W and Avenue L, City of Lancaster, County of Los Angeles, California, or the "Subject Property". Any exceptions to, or deletions from, this practice are described in Section 2.3 of this report. This assessment has revealed no recognized environmental conditions (RECs), Controlled RECs (CRECs), or significant data gaps in connection with the Subject Property. No further investigation appears to be warranted at this time.



7.0 NON-SCOPE CONSIDERATIONS

The following ASTM E1527-21 Non-Scope Considerations were performed as part of this Phase I ESA:

7.1 LEAD-BASED PAINT

Concern for lead-based paint (LBP) is primarily related to residential structures. The EPA's Final Rule on Disclosure of Lead-Based Paint in Housing (40 CFR Part 745) defines LBP as paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter or 0.5 percent by weight.

The risk of lead toxicity in LBP varies based upon the condition of the paint and the year of its application. The U.S. Department of Housing and Urban Development (HUD) has identified the following risk factors:

The age of the dwelling as follows: maximum risk is from paint applied before 1950.

There is severe risk from paint applied before 1960.

There is moderate risk from deteriorated paint applied before 1970.

There is slight risk from the paint that is intact but applied before 1977.

The condition of the painted surfaces.

The presence of children and certain types of households in the building.

Previously reported cases of lead poisoning in the building or area.

There are no structures on the Subject Property; therefore, LBP is not an environmental concern for the Subject Property

7.2 ASBESTOS

Asbestos can be found in many applications, including sprayed-on or blanket-type insulation, pipe wraps, mastics, floor and ceiling tiles, wallboard, mortar, roofing materials, and a variety of other materials commonly used in construction. The greatest asbestos-related human health risks are associated with friable asbestos, which is ACM that can be reduced to powder by hand pressure. Friable asbestos can become airborne and inhaled, which has been associated with specific types of respiratory disease. The manufacturing and use of asbestos in most building products was curtailed during the late 1970s.

Stantec makes no warranty as to the possible existence or absence of inaccessible materials or to their evaluation with respect to asbestos content. Samples of suspect ACM should be collected for laboratory analysis of asbestos prior to any renovation or building demolition to be compliant with, EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations.

There are no structures on the Subject Property; therefore, ACMs are not an environmental concern for the Subject Property



Non-Scope Considerations
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7.3 RADON

Radon is a colorless, tasteless radioactive gas with an EPA-specified action level of 4.0 PicoCuries per liter of air (pCi/L) for residential properties. Radon gas has a very short half-life of 3.8 days. The health risk potential of radon is primarily associated with its rate of accumulation within 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. Large, adequately ventilated rooms generally present limited risk for radon exposure. The radon concentrations in buildings and homes depend on many factors, including soil types, temperature, barometric pressure, and building construction (EPA, 1993).

Stantec reviewed regional data published by the EPA on average indoor radon concentrations in the vicinity of the Subject Property (<http://www.epa.gov/radon/zonemap.html>).

EPA Radon Zones (w/Average Measured Indoor Radon concentrations)		
Zone 1 – High (>4.0 pCi/L)	Zone 2 – Moderate (2 to 4 pCi/L)	Zone 3 – Low (<2 pCi/L)
	X	
Normally-occupied sub grade areas present? (i.e., basement apartments, offices, stores, etc.)		
None		

The Subject Property is located in Zone 2 and is considered to have medium potential for radon. One of the 32 tests conducted at zipcode 93536 was above 4pCi/L. To determine Subject Property-specific radon levels, a radon survey would have to be conducted. However, because there are no occupied subgrade areas, further investigation of indoor radon issues does not appear to be warranted.

7.4 FLOOD ZONES

According to the Physical Setting summary portion of the EDR report, the western perimeter of the Subject Property is located within a 0.2% Annual Chance Flood Hazard zone. Stantec also searched the Federal Emergency Management Agency (FEMA) flood plain map service at www.msc.fema.gov and did not identify active links to maps showing the flood plain designations in Los Angeles County. The nearest Surface Water is a creek, located approximately 1.53 miles south of the Subject Property.



References
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8.0 REFERENCES

ASTM International, 2021, Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process, Designation: E 1527-21.

ASTM International, 2022, Standard Guide for Vapor Encroachment Screening on Subject Property Involved in Real Estate Transactions, Designation E 2600-22.

California Department of Toxic Substances Control, 2023, EnviroStor

California State Department of Water Resources Control Board, 2023, GeoTracker

California State Department of Water Resources SGMA Portal (SGMA), 2023, GeoTracker

California Geological Survey Earthquake Fault Zones and Seismic Hazard Zones, Lancaster 7.5 Minute Quadrangle

California State University Northridge, Geomorphic Regions of California,
<https://www.csun.edu/science/sierras/geomorphic-regions/index.html>

City of Lancaster Department of Building, 2010, Zone Information and Mapping System

Environmental Data Resources, Inc. (EDR), EDR Radius Map with Geocheck, Inquiry Number 7306404.2s, dated April 12, 2023.

_____, Certified Sanborn Map Report, Inquiry Number 7306404.3, dated April 12, 2023.

_____, Historical Topographic Map Report, Inquiry Number 7306404.4, dated April 12, 2023

_____, Aerial Photo Decade Package, Inquiry Number 7306404.8, dated April 13, 2023.

_____, City Directory Abstract, Inquiry Number 7306404.5 dated April 17, 2023.

United States Environmental Protection Agency (EPA), 2019, EPA Radon Zones
<https://www.epa.gov/radon/find-information-about-local-radon-zones-and-state-contact-information>

United States Federal Emergency Management Agency (FEMA), 2019, FEMA Floodzone Map Service



FIGURES

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APPENDICES

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**APPENDIX A
PHOTOGRAPHS OF THE
PROPERTY AND VICINITY**

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**APPENDIX B
STANTEC RESUMES**

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APPENDIX C
USER PROVIDED RECORDS

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**APPENDIX D
ENVIRONMENTAL AGENCY DATABASE
SEARCH REPORT**

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APPENDIX E
HISTORICAL DOCUMENTS

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