

Exhibit 11: Radon Testing and Mitigation Standards (02/16/23)



Radon Testing and Mitigation Standards

(See Section 61.14)

Standard	Guide Requirement
State and Local Law Compliance	The Environmental Professional must comply with all applicable State and local requirements governing radon testing and mitigation. If there is any conflict between State or local laws and these requirements, the Lender should follow the more stringent standard.
Environmental Professional	<p>All radon testing will be managed by the Environmental Professional. If applicable State law requires radon testing to be conducted by a State-certified radon professional, the Environmental Professional must be State-certified or engage a State-certified radon professional to conduct the testing.</p> <p>The Environmental Professional is responsible for overseeing the deployment and retrieval of radon testing canisters and, unless expressly prohibited by State law, may direct a Property representative to place or retrieve the radon testing canisters as deemed appropriate by the Environmental Professional. If the Environmental Professional directs a Property representative to place or retrieve the radon testing canisters, proper training and direction must be provided to the Property staff by the Environmental Professional.</p>
Environmental Assessment	The initial radon testing will be conducted in connection with the environmental assessment as a Non-Scope Issue and the testing results delivered with the environmental report.
Resident Notification	<p>The Environmental Professional or a Property representative must provide notices to staff/tenants, including guidance on maintaining proper closed building conditions.</p> <p>The tenant notices should include:</p> <ul style="list-style-type: none"> • Testing notifications, including dates and times for canister deployment and retrieval • Instructions on how tenants can maintain proper testing environments • Information on how to obtain federal or State radon health guidance • Contact information for: <ul style="list-style-type: none"> ◦ The State’s radon office or hotline for general radon inquiries, if any ◦ The Environmental Professional’s contact information for specific inquiries regarding the radon test <p>Tenants will not be required to sign a non-interference agreement.</p>
Initial Testing Protocols	The Environmental Professional may conclude that testing or mitigation is not necessary provided the rationale supporting this conclusion is documented in the executive summary to the environmental report. (Note: The Environmental



	<p>Professional may not use the Environmental Protection Agency Map of Radon Zones as the primary rationale in making this determination.)</p> <p>The Environmental Professional:</p> <ul style="list-style-type: none"> • Must test or oversee testing of at least 25 percent of all ground-contact units at the Property, selected in the Environmental Professional’s professional judgment, with no fewer than one radon test per each building having ground-contact units¹; and • May allow for no more than 15 percent lost or faulty tests; if more than 15 percent of the tested units are faulty, lost or not retrievable, the Environmental Professional must determine whether the available results are sufficient to ascertain the radon risks at the Property, or whether testing of additional units is required.
<p>Follow-Up Testing Protocol</p>	<p>After completion of the initial radon testing, if any building at the Property has at least one unit with an elevated radon concentration equal to or greater than 4.0 pCi/L, the Environmental Professional must either:</p> <ul style="list-style-type: none"> • Recommend installation of a radon mitigation system in all buildings having a unit with a radon concentration of 4.0 pCi/L or above; or • Conduct a follow-up second round of testing within each building having a unit with an initial radon test level at the 4.0 pCi/L threshold or higher, using either short- or long-term testing. The second round of testing must cover at least 25 percent of the ground contact units in that building, selected in the Environmental Professional’s professional judgment (but must include each unit that tested at 4.0pCi/L or greater during the first round of testing)².
<p>Threshold for mitigation</p>	<p>After the follow-up round of testing, the implementation of radon mitigation measures is required for each building having units where the average of the two-short-term tests (or the results of the follow-up long-term test) indicated a radon concentration of 4.0 pCi/L or higher.</p>
<p>Mitigation Standards</p>	<p>Any building needing radon mitigation per these requirements must be mitigated:</p> <ul style="list-style-type: none"> • In compliance with all applicable laws and regulations; • By a qualified radon mitigation firm that will determine: <ul style="list-style-type: none"> ◦ The type of appropriate mitigation system required; and ◦ Whether the installation of a multi-unit mitigation system is necessary. <p>If the installation of a radon mitigation system is required, post-mitigation testing must confirm a radon concentration of less than 4 pCi/L.</p>

¹ For Properties taken under application on or prior to June 30, 2023, a minimum of 10% of ground-contact units at the Property must be subject to the initial round of radon testing, with no fewer than one radon test per building having ground-contact units.

² For Properties taken under application on or prior to June 30, 2023, follow-up radon testing is only required to occur in each unit that tested at 4 pCi/L or greater during the initial round of testing.



Operations and Maintenance Program (O&M Program)	Any required mitigation system must be managed under an O&M Program to be prepared by the Environmental Professional. The O&M Program must include periodic inspections of all system components by a qualified Property representative.
Ongoing Radon Testing	Not required, unless specified under the O&M Program to confirm on-going performance of the mitigation system.