



**PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

40 East 4th Street
Reno, Nevada, 89501
(APN: 007-296-22)

Prepared for:

Nevada Division of Environmental Protection-Brownfields Program
Attn: Mr. David Friedman
901 S. Stewart St., Suite 4001
Carson City, NV 89701
Brownfields Contract: DEP #17-026
Task BC04-19
Category 54
Organizational Code 5429
Job Number 6681717

Prepared by:

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August 2, 2019

Project No.: 19-02-133



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Creating Solutions, Building Trust.

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Nevada Division of Environmental Protection-Brownfields Program
901 S. Stewart St., Suite 4001
Carson City, NV 89701

Attn: Mr. David Friedman

RE: Phase I Environmental Site Assessment, 40 E. 4th St., (APN: 007-296-22) Reno, Nevada 89501.

Dear Mr. Friedman:

Attached is the report titled *Phase I Environmental Site Assessment, 40 E. 4th St., (APN: 007-296-22), Reno, Nevada 89501*. This report includes a description of activities performed and results obtained from the investigation.

Should you have questions regarding the work performed or results obtained, please do not hesitate to contact us.

Sincerely,

BROADBENT & ASSOCIATES, INC.

Brandon Reiff, PG, CEM #2300 (exp. 3/23/20)
Senior Geologist

Enclosure: Phase I Environmental Site Assessment

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List of Drawings

- 1 Site Location Map
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- A Assessor's Parcel Map
- B User-Provided Information Questionnaire
- C Environmental Records Search Report
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List of Commonly Used Acronyms

AAI – All Appropriate Inquiries
APN – Assessor’s Parcel Number
AST – Aboveground Storage Tank
ASTM – ASTM International
Broadbent – Broadbent & Associates, Inc.
CDL – Clandestine Drug Laboratory
CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act
CFR – Code of Federal Regulations
CREC – Controlled Recognized Environmental Condition
EDR – Environmental Data Resources
EMI – Emissions Inventory Data
EPA – United States Environmental Protection Agency
ESA – Environmental Site Assessment
FID – Facility Inventory Database
FINDS – Facility Index System
FIFRA – Federal Insecticide, Fungicide and Rodenticide Act
HAZNET – Hazardous Waste Facility & Manifest Database
HREC – Historical Recognized Environmental Condition
LF – Landfill
LUST – Leaking Underground Storage Tank
NDEP – Nevada Division of Environmental Protection
NPL – National Priorities List
PCB – Polychlorinated-biphenyls
ppb – Parts per billion
ppm – Parts per million
PVC – polyvinyl chloride
RCRA – Resource Conservation & Recovery Act
RCRIS – Resource Conservation & Recovery Act Information System
RDA – Redevelopment Agency
REC – Recognized Environmental Condition
SARA – Superfund Amendments and Reauthorization Act
SLIC – Spills, Leaks, and Investigation Cleanups
SCS – Soil Conservation Service
SWEEPS – Statewide Environmental Evaluation and Planning System
SWF – Solid Waste Facility
SWRCY – Solid Waste Recycler Database
TSCA – Toxic Substances Control Act
USDA – United States Department of Agriculture
USGS – United States Geological Survey
UST – Underground Storage Tank

Executive Summary

To assist the City of Reno with their due diligence efforts, Broadbent & Associates, Inc. (Broadbent) has conducted this Phase I Environmental Site Assessment (ESA) on the real property located at 40 E. 4th St. (APN 007-296-22), Reno, Nevada, 89501. This ESA was conducted in conformance with the scope and limitations of ASTM Practice E1527-13: *Standard Practice for Environmental Site Assessments – Phase I Environmental Site Assessment Process*, and the United States Environmental Protection Agency (EPA) final rule contained within Code of Federal Regulations Volume 40 Part 312 – *Standards and Practices for All Appropriate Inquiries*. Exceptions to, or deletions from, this practice are described in Section 1 of this report. Use of the referenced ASTM Process is intended to satisfy requirements for conducting “all appropriate inquiries” (AAI) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

This assessment has revealed no recognized environmental conditions in connection with the Property.

Section 1: Introduction

This section describes the purpose of and authorization for conducting this assessment. Also discussed are significant assumptions, deviations, special terms and conditions, and user reliance on this report.

1.1 Purpose

To assist the City of Reno with their due diligence efforts relative to the site located at 40 E. 4th St., (APN: 007-296-22) in Reno, NV (Property), Broadbent & Associates, Inc. (Broadbent) conducted an All Appropriate Inquiry Phase I Environmental Site Assessment (ESA) consistent with the ASTM International Standard E1527-13: *Standard Practice for Environmental Site Assessments – Phase I Environmental Site Assessment Process*, and the United States Environmental Protection Agency (EPA) final rule contained within Code of Federal Regulations (CFR) Volume 40 Part 312 – *Standards and Practices for All Appropriate Inquiries* (AAI). The purpose of this due diligence investigation is to identify recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), historical recognized environmental conditions (HRECs), and/or *de minimis* conditions as defined below.

A REC is defined by ASTM International as:

“The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions.”

A HREC is defined by ASTM International as:

“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 (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

A CREC is defined by ASTM International as:

“A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

A *De Minimis* Condition is defined by ASTM International as:

“A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* conditions are not recognized environmental conditions nor controlled recognized environmental conditions.”

1.2 Scope of Work

Various investigative methods were utilized to complete this ESA. Specific items accomplished include the following:

- Prepared a general site description
- Reviewed User-provided information
- Reviewed readily ascertainable environmental records
- Conducted a site reconnaissance
- Conducted interviews
- Identified data gaps (if present)
- Prepared this ESA report summarizing assessment results

1.3 Significant Assumptions

Conclusions stated in this report are based upon observations made by employees of Broadbent and also upon information provided by others. It is assumed that these observations and information are accurate. However, Broadbent cannot be held responsible for the accuracy of the information provided by others. The scope of this ESA does not purport to encompass every report, record, or other form of documentation relevant to the Property being evaluated.

1.4 Deviations

There were no deviations from the ASTM International standards.

1.5 Special Terms and Conditions

Observations contained within this assessment are based upon Property conditions readily visible and present at the time of the site reconnaissance. These Property observations are unable to specifically identify conditions of potential mold, asbestos containing building materials, subsurface soil, groundwater, vapor, or underground storage tanks, unless specifically mentioned. This ESA does not attempt to address the unidentified past or forecast future Property conditions.

1.6 Reliance

The enclosed ESA has been conducted for the exclusive use of NDEP and the City of Reno and may not be reproduced, distributed, or relied upon by others without the prior written authorization of NDEP and/or City of Reno and Broadbent. A Reliance Letter can be prepared for additional use upon request by NDEP or City of Reno.

Section 2: Site Description

This section describes the Property with its location and legal description, general vicinity characteristics, current uses, description of on-site improvements, and current uses of adjoining properties.

2.1 Location and Legal Description

The Property is located within the incorporated limits of Reno, NV. The Property's current physical address is 40 E. 4th St., Reno, NV. The Property consists of one parcel assigned Washoe County Assessor's Parcel Number 007-296-22. A copy of the Washoe County Assessor's Parcel Map for the Property is provided in Appendix A.

Approximate latitude and longitude coordinates for the center of the Property are 39.5295210 North, -119.8131590 West NAD83. The Property is located within the northeast quarter of Section 11, Township 19 North, Range 19 East, relative to the Mount Diablo Baseline and Meridian. The Property is covered by the United States Geological Survey (USGS) 6723545 Reno, NV 7.5-minute quadrangle topographic map. A Site Location and Property Location Map are provided as Figures 1 and 2, respectively.

2.2 Current Uses of the Site

The Property is currently the CitiCenter Plaza Park. No RECs, CRECs, and/or HRECs were noted relative to the Property based on review of current uses of the Property.

2.3 Description of Structures, Roads, and Other Improvements

The Property is currently developed with two single-story office buildings consisting of approximately 3,742 sq. feet. The structures were built in 1986 and are constructed of reinforced concrete framing and concrete block exterior walls. The heating and cooling systems for the Property buildings are provided by space heaters and electric air conditioning units. The northern building is currently vacant. The southern building is currently used by the City of Reno Ambassadors. Additional Property information is provided in the table below.

Size of Property (approximate)	According to the Washoe County Assessor, the approximate size of parcel 007-296-22 is 1.135 acres.
General Topography of Property	The Property has a gradual downward slope to the east-southeast.
Adjoining and/or Access/Egress Roads	The Property is accessible by entrances/exits on the east side of the Property via Center St. and on the northern side via E. 4 th St. and an alleyway on the western side of the Property.
Paved or Concrete Areas (including parking)	The Property is paved in concrete.
Unimproved Areas	There are no known unimproved areas.
Landscaped Areas	Several concrete tree planter areas were observed on the Property.
Surface Water	The Truckee River is approximately 0.27 miles south of the Property.
Potable Water Source	Truckee Meadows Water Authority
Sanitary Sewer Utility	Washoe County

Storm Sewer Utility	Washoe County
Electrical Utility	NV Energy
Natural Gas Utility	NV Energy

No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of structures, roads and other improvements to the Property.

2.4 Current Uses of Adjoining Properties

Adjoining properties are used for various purposes. Uses of adjoining properties at the time of this investigation are the following:

<i>Direction</i>	<i>Address</i>	<i>Use & Occupant</i>	<i>Comments</i>
North	N/A 401 N. Center St.	E. 4 th St. The Reno Ballroom	Public thoroughfare APN: 007-551-06
South	N/A 50 E. Plaza St.	E. Plaza St. Whitney Peak Parking Garage	Public thoroughfare APN: 011-370-52
West	N/A 380 N. Virginia St. 354 N. Virginia St. 340 N. Virginia St. 332 N. Virginia St. 300 N. Virginia St. 11 E. Plaza St.	Alleyway Various Retail Stores Various Retail Stores Retail Store Parking Lot Palace Jewelry Pawn Shop Parking Lot	Public thoroughfare APN: 007-296-14 APN: 007-296-13 APN: 007-296-12 APN: 007-296-23 APN: 007-296-21 APN: 007-296-20
East	N/A 300 N. Center St.	N. Center St. National Bowling Stadium	Public thoroughfare APN: 011-380-29

No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of current uses of adjoining properties.

Section 3: User-Provided Information

The purpose of this section is to detail User-provided information used to help identify the possibility of RECs in connection with the Property. A User Questionnaire was provided to the User to assist them in compiling pertinent information. User-provided information is summarized below and included in Appendix B.

3.1 Owner, Key Property Manager, or Occupant Provided Information

According to Washoe County Assessor Data, the Property is owned by the City of Reno. The Property is currently utilized as the CitiCenter Plaza Park.

3.2 Title Records, Environmental Liens or Activity and Use Limitations

Reasonably ascertainable recorded land title records should be checked by the User to identify environmental liens or activity and use limitations, if currently recorded against the Property. Environmental liens or activity and use limitations so identified are supposed to be reported to the Environmental Professional conducting the ESA. No evidence of environmental liens or activity and/or use limitations was discovered or brought to the attention of Broadbent.

No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of title records, environmental liens, or activity and use limitations.

3.3 Specialized Knowledge

If the User has or is aware of any specialized knowledge or experience that is material to RECs in connection with the Property, it is the User's responsibility to communicate this information to the Environmental Professional. The User provided specialized knowledge that the Property was formerly used as the Regional Transportation Commission (RTC) Bus Transit station.

No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of available specialized knowledge.

3.4 Valuation Reduction for Environmental Issues

In a transaction involving the purchase of a parcel of real estate, if a User has actual knowledge that the purchase price of the Property is significantly less than the purchase price of comparable properties, the User should try to identify an explanation for the lower price and to make a written record of such explanation. User provided no information relative to valuation reduction relative to the Property.

No RECs, CRECs, and/or HRECs were noted relative to the Property based on review of information relative to valuation reduction for environmental issues.

3.5 Reason for Conducting Phase I

The purpose of this ESA was to identify existing or potential RECs, CRECs, and/or HRECs (as defined by ASTM Standard E1527-13) in connection with the Property, and it is assumed to also be to qualify the User for Landowner Liability Protection (LLP) relative to potential CERCLA liability.

Section 4: Records Review

The purpose of a Records Review is to obtain and review records that will help identify RECs, CRECs, and/or HRECs in connection with the Property. A discussion of each record source is provided below.

4.1 Physical Setting

Physical setting information for the Property was obtained by a review of sources that included, but was not limited to, USGS topographic maps and a USDA soil survey report.

4.1.1 Topography

The USGS, 6723545 Reno, NV Quadrangle 7.5-Minute series topographic map was reviewed for this ESA. According to the contour lines on the topographic map, the Property is located at an approximate elevation of 4,503 ft above mean sea level. The contour lines in vicinity of the Property indicate the area has a gradual downward slope to the east-southeast.

4.1.2 Surface Water Bodies

The Truckee River is approximately 0.27 miles south of the Property. No on-site water wells or springs were observed during the Property reconnaissance. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins were observed on the Property during this investigation.

4.1.3 Geology and Hydrology

The Property is located in downtown Reno, NV. The geological deposits of this area are described by the USGS as stratified sequences of quaternary alluvium. Based on the soil survey maps published by the USDA Soil Conservation Service (SCS), the Property is predominately mapped as "Orr" which is gravelly sandy loam soil texture. The Property soil hydrologic group classification is Class B – Moderate infiltration rates. Class B soils are "deep and moderately deep, moderately well and well drained soils with moderately coarse textures."

The groundwater flow direction in the vicinity of the Property based on topography is assumed to be toward the south. Depth to groundwater is expected to be approximately 15-40 ft below land surface (BLS) in the area near and beneath the Property, according to the Nevada Division of Water Resources on-line Well Log Database.

4.2 Environmental Record Sources

Broadbent contracted Environmental Data Resources, Inc. (EDR) to conduct a search of available state, federal, and other ascertainable environmental records. The area searched included the Property and surrounding area within approximate minimum search distances from the Property boundary, dependent on listing type, as defined by ASTM International. A complete listing of records searched is available in the EDR Radius Report provided in Appendix C. An abbreviated list of search results is provided in the table below relative to records that identified a regulatory listing relevant to the Property. A subsequent discussion is provided relative to identified potential concerns.

<i>Standard Database List Per ASTM International</i>	<i>Database Date (M/D/Y)</i>	<i>Subject Property Listed (Y or N)</i>	<i>Total No. of Listings</i>	<i>Environmental Concern Posed to the Subject Property (Y or N)</i>
Federal Agencies				
Federal NPL Sites (<1.0 mile)	4/11/19	N	0	N
Federal Delisted NPL Sites (<1.0 mile)	4/11/19	N	0	N
Federal SEMS Sites (< 0.5 mile)	3/11/19	N	0	N
Federal CERCLIS NFRAP – SEMS ARCHIVE Sites (<0.5 mile)	3/11/19	N	1	N
RCRA CORRACTS Sites (<1.0 mile)	3/25/19	N	0	N
RCRA non-CORRACTS TSD Facilities (< 0.5 mile)	3/25/19	N	0	N
RCRA LQG (<0.25 mile)	3/25/19	N	0	N
RCRA SQG (<0.25 mile)	3/25/19	N	0	N
RCRA CESQG (<0.25 mile)	3/25/19	N	6	N
Federal ERNS Sites (Property Only)	3/25/19	N	0	N
US Institutional/Engineering Controls (<0.5 mile)	1/31/19	N	0	N
State Agencies				
State & Tribal equivalent CERCLIS (SHWS) (<1.0 mile)	12/17/18	N	179	N
State & Tribal SWF/LF (<0.5 mile)	11/27/18	N	0	N
State & Tribal LUST (<0.5 mile)	12/17/18	N	2	N
State & Tribal ASTs (<0.25 mile)	1/25/18	N	1	N
State & Tribal USTs (<0.25 mile)	1/25/18	N	40	N
State & Tribal Voluntary Cleanup Sites (<0.5 mile)	12/17/18	N	0	N
State & Tribal Brownfield Sites (<0.5 mile)	12/17/18	N	3	N
Other Ascertainable Records				
US Brownfields (<0.5 mile)	12/17/18	N	16	N
Recycling Facilities in Nevada (SWRCY) (<0.5 mile)	10/12/18	N	4	N
RCRA-NonGen (<0.25)	3/25/19	N	25	N
EDR Exclusive				
EDR US Historic Auto Station (<0.125 mile)	NA	N	8	N
EDR US Historic Dry Cleaners (<0.125 mile)	NA	N	0	N
EDR US Manufactured Gas Plants (<0.25 mile)	NA	N	2	N

Based on information contained within the EDR report, the Property was not listed in any of the databases that were searched. Database results for properties surrounding the target property are discussed below.

Results of the records search found 179 sites located within one mile of the Property listed on the Corrective Action Sites (SHWS) database. Sixteen of these SHWS sites are within 0.25 miles of the Property. These 16

sites were identified as petroleum hydrocarbon releases affecting soil and/or groundwater. 15 of the 16 sites have been granted closure by the appropriate agency. The nearest "open" SHWS case to the Property is identified as 'Granite Construction Company Mobile Source'. This site is located approximately 1,309 feet west-southwest of the Property. The release was reported to the Nevada Division of Environmental Protection (NDEP) on May 10, 2004 for a diesel release to soil. A case closure date has not been reported for this site. However, given the intervening gradient and distance from the Property, the potential for environmental impact to the Property appears to be low.

The LUST database indicates two sites within 0.5 miles of the Property. The nearest LUST site is approximately 1,263-feet northeast of the Property. The site is identified as Marsh Properties LLC. This site was enrolled into the LUST database on February 8, 2018 as a result of a heating oil release which affected soil at the site. The site was granted closure on May 2, 2018 by the appropriate agency. Given the site status, and distance from the Property, the potential for environmental impact to the Property appears to be low.

The second LUST site is located approximately 1,894-feet east-southeast of the Property. The site is identified as Reno Police Department. The site was enrolled into the LUST database on an unknown date resulting from a gasoline release which affected soil and groundwater at the site. The site was granted closure on March 5, 2014 by the appropriate agency. Given the site status, and distance from the Property, the potential for environmental impact to the Property appears to be low.

Review of the SEMS-ARCHIVE list has revealed that there is one SEMS - ARCHIVE site located within approximately 0.5 miles of the Property and identified as Washoe Drum Site. This site is located approximately 1,706 feet south-southeast of the Property. The Washoe Drum Site is identified as a "Removal Only Site" and no site assessment work is needed.

The Federal SEMS-ARCHIVE database provides a list of sites that have been removed and archived from the inventory of SEMS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless further information indicates that this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site. Given the archived site-status, the potential for environmental impact to the Property relative to this site appears to be low.

The EDR records search found three sites within 0.5 miles of the Property listed on the NV Brownfields database. The term "brownfield" is used to describe abandoned, idled, or underused industrial or commercial properties taken out of productive use because of real or perceived risks from environmental contamination. The State of Nevada has initiated Brownfields, a land-recycling program, to provide an opportunity to redevelop these undesirable properties and revitalize communities. These three sites were identified as petroleum hydrocarbon releases affecting soil and groundwater. Each of the three sites have been granted closure by the appropriate agency. The three sites are identified in the EDR report as Reno Downtown Events (closure date January 7, 2005), Union 76 Station #00 (closure date January 7, 2005), and Regional Transportation Commission – Washoe County (closure date December 11, 2008). Given the site statuses and distance from the Property, the potential for environmental impact to the Property appears to be low.

Other sites listed in the table above, but not yet specifically discussed, do not likely pose a significant environmental concern relative to the Property for one or more of the following reasons: distance from Property; relative location to the Property; operating UST facilities with no violations; UST facilities that are

permanently out of service; site listing not indicative of a release but rather simply indicating that the site/facility may possess chemicals of concern (e.g. RCRA Non-Gen).

4.3 Vapor Intrusion

Vapor intrusion occurs when chemicals volatilize and migrate from impacted soil and/or groundwater up into a building's interior space. Vapor intrusion can pose a potential health threat to the occupants of the building, especially to sensitive populations such as the elderly and children.

Sites within the approximate minimum search distances of 1/3 of a mile for chemicals of concern (COC) and 1/10 of a mile for petroleum hydrocarbon COC were reviewed. Based on the regulatory status, the characteristics of the offsite suspect sources, and/or lack of documented groundwater plumes within the areas of concern, it is unlikely that the Property has been impacted by vapor intrusion from surrounding sites.

4.4 Historical Record Sources

The following standard historical sources may be used to meet the historical record sources review requirements of ASTM E1527-13: aerial photographs; fire insurance maps; property tax files; land title records (although these cannot be the sole historical source consulted); topographic maps; city directories; building department records; or zoning/land use records. ASTM E1527-13 requires "All obvious uses of the property shall be identified from the present, back to the property's first developed use, or back to 1940, whichever is earlier." This task requires reviewing only as many of the standard historical sources as are necessary and that are reasonably ascertainable and likely to be useful.

4.4.1 Historical Topographic Maps

The following historical topographic maps were reviewed and described. Copies of the historical topographic maps are provided in Appendix D.

<i>Date(s)</i>	<i>Map Source & Scale</i>	<i>Property Observations</i>	<i>Surrounding Area Observations</i>
1891	Reno Quad 1:125000	Property is located in downtown Reno.	Central Pacific Railroad, V&T Railroad, and the Truckee River are recorded on this map.
1893	Reno Quad 1:125000	No significant change.	No significant change.
1950	Reno Quad 1:62500	Property is within the developed part of downtown Reno. The Central Pacific Railroad is adjacent south of the Property.	Increasing development of downtown Reno area. Apparent building structures are observed east of the Property. The V & T Railroad is re-routed east of the Property. Reno High School, S. Virginia St., Idlewild Park, E. 4 th St., University of Nevada-Reno, the Reno Fair Grounds, and Highland Reservoir are recorded on this map.

1951	Reno Quad 1:62500	No significant change.	No significant change.
1967	Reno Quad 1:24000	No significant change.	St. Mary's Hospital is identified northwest of the Property. An aqueduct is recorded southeast of the Property. I-80 is being constructed north of the Property.
1974	Reno Quad 1:24000	No significant change.	Increasing development of Reno. Buildings are identified adjacent north, west, and south of the Property. Interstate 80 and US 395 are being constructed on the map. Surrounding area of the Property is predominately commercial.
1982	Reno Quad 1:24000	No significant change.	I-80 is developed north of the Property. A fire station is identified southwest of the Property on this map.
2015	Reno Quad 1:24000	No significant change.	Surrounding area appears to be developed in their current configuration on this map.

No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of the historical topographic maps.

4.4.2 Historical Aerial Photographs

The following historical aerial photographs were reviewed and described. Copies of the historical aerial photographs are provided in Appendix D.

Date(s)	Photo Source & Scale	Property Observations	Surrounding Area Observations
1939	USDA 1" = 500'	There is an apparent small building (possible shed) structure seen on the northern portion of the Property. There are several apparent cars parked on the middle portion of the Property. Two large apparent commercial building structures and a smaller building structure are seen on the southern portion of the Property in this photo.	Surrounding area is predominately developed with apparent industrial/commercial use. E. 4 th St., North Center St., and East Plaza St. are developed adjacent to the Property. Apparent commercial building structures are seen adjacent to the Property. The Truckee River is south of the Property. The Union Pacific Railroad is adjacent south of the Property.
1946	USGS 1" = 500'	There appears to be additional building structures added to the northern portion of the Property.	No significant change.

1953	USGS 1" = 500'	No significant change.	No significant change.
1966	USGS 1" = 500'	Two apparent smaller shed-like buildings are seen on the southern portion of the Property. The Property appears to be used as a parking lot.	Large parking lots are developed adjacent east and south of the Property. It appears N. Center St. and E. 4 th St. have been widened.
1972	SLA 1" = 500'	Property is an apparent parking lot. No apparent building structures are observed on the Property.	I-80 is seen under construction north of the Property.
1980	USGS 1" = 750'	Poor photo quality can't properly observe the Property.	No significant change (poor resolution to photo).
1984	USGS 1" = 1000'	No significant change.	An apparent parking garage is observed adjacent south of the Property in this photo.
1994	USGS 1" = 500'	An apparent building structure is observed on the Property (poor photo).	I-80 is developed north of the Property. The National Bowling Stadium is developed adjacent east of the Property (poor quality photo).
1999	USGS/DOQQ 1" = 500'	Current configuration of buildings.	Apparent large commercial building seen adjacent north of the Property. Further development of downtown hotels northwest of the Property is seen in this photo.
2006	USDA/NAIP 1" = 500'	No change to Property.	The Reno Convention Center is developed adjacent northeast of the Property in this photo.
2010	USDA/NAIP 1" = 500'	No significant change.	Surrounding area buildings appear to be developed in their current configuration in this photo.
2013	USDA/NAIP 1" = 500'	No significant change.	No significant change.
2017	USDA/NAIP 1" = 500'	No significant change.	No significant change.

No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of the historical aerial photographs.

4.4.3 Fire Insurance Maps

Fire insurance maps were initially produced by private companies (such as Sanborn, Perris, and the Fire Underwriters Inspection Bureau) for the insurance industry to provide information regarding the uses of properties at specified dates. A copy of the Certified Sanborn Map Report is provided in Appendix D.

Date(s)	Map Source	Property Observations	Surrounding Area Observations
1885	Sanborn	Property has three to four small shed structures mapped on the southern portion of the Property. A small dwelling structure is mapped on the northern portion of the Property.	Mt. St. Mary's Academy is mapped east of the Property. The Reno City Motel along with several small dwellings/sheds are mapped adjacent west of the Property. The Central Pacific Railroad Freight House is adjacent south of the Property. Center St. is adjacent east of the Property.
1890	Sanborn	Small dwelling mapped on the northern portion of the Property. Several apparent commercial/residential buildings are mapped on the southern portion of the Property.	A corral is mapped adjacent northeast of the Property. Additional apparent commercial structures are mapped adjacent west of the Property.
1899	Sanborn	No significant change.	Several residential dwellings are mapped adjacent west of the Property. The Grand Central Hotel, Tremont Headquarters, and a lodge are mapped adjacent west of the Property. Several residential dwellings are mapped adjacent east of the Property. Dwellings are mapped adjacent north of the Property.
1904	Sanborn	Washoe Stables, Livery & Feed building is mapped on the Property. A Society Hall and several small dwellings are mapped on the southern portion of the Property. Two residential buildings and two shed-like structures are mapped on the northern portion of the Property.	Hotel Nevada is mapped adjacent east of the Property. E. 4 th St. and E. Plaza St. are mapped north and south of the Property, respectively.
1906	Sanborn	No significant changes.	No significant changes.

1918	Sanborn	An additional dwelling structure is mapped on the northern portion of the Property. An auto garage and auto storage building structures are mapped on the southern portion of the Property.	Auto Repair and Auto garage are mapped adjacent west of the Property. Plumbing, vulcanizing, clothes cleaning, and residential dwellings are mapped adjacent west of the Property.
1949	Sanborn	Two structures labeled "Gas & Oil" are mapped on the Property. A large parking lot is mapped in the middle of the Property. A Hotel and several apparent commercial businesses including a "Laundry-solvent" facility are mapped on the southern portion of the Property.	Reno Junior High School and a gymnasium are mapped adjacent east of the Property. A hotel, auto repair shop, and various stores are mapped adjacent west of the Property. The Sierra Pacific Railroad and associated railroad infrastructure are mapped south of the Property. A large Auto Sales & Service building is mapped adjacent north of the Property.
1955	Sanborn	A large structure labeled "Gas & Oil" is mapped on the northern portion of the Property. Southern portion of the Property comprises of various commercial structures.	A gas & oil building structure is mapped northeast of the Property.
1957	Sanborn	No significant changes.	Northside Junior High School is mapped adjacent east of the Property.
1966	Sanborn	The northern portion of the Property is a parking lot. Only one small shed structure remains mapped on the northern portion of the Property. The southern portion of the Property is a parking lot with two small structures. A possible gas station is mapped on the southern portion of the Property. The building is labeled as "Gas & Af."	No significant changes.
1970	Sanborn	The Property is mapped as a parking lot. One tiny shed-like structure is mapped on the Property.	A large parking lot is mapped adjacent east of the Property. A parking lot is mapped adjacent west of the Property.
1972	Sanborn	No significant changes.	No significant changes.

No environmental RECs, CRECs, and/or HRECs were identified relative to the Property based on review of the historical fire insurance maps.

4.4.4 City Directories

City directories have been published for cities and towns across the US since the 1700s. Originally a list of residents, the city directory developed into a sophisticated tool for locating individuals and

businesses in a particular urban or suburban area. Twentieth-century directories are generally developed into three sections: a business index, a list of resident names and addresses, and a street index. With each address, the directory lists the name of the resident or, if a business is operated from this address, the name and type of business (if unclear from the name). While city directory coverage is comprehensive for major cities, it may be less comprehensive for rural areas and small towns.

Broadbent requested EDR to provide a search of available historic city directories that may list the Property. EDR researched Polk's City Directories for non-sequential years beginning in 1932 and up to 2014. It should be noted that residential addresses within the unincorporated portions of counties were typically not included within city directories. City Directory results are included in Appendix D. Results of this search yielded the following information:

40 E. 4th St. – The Property address of 40 E. 4th St. appears in the EDR Digital Archive and Polk City Directory as 'Citi Center building – Downtown Transit Facility' in 1986. There were no listings for the street address in the EDR Digital Archive's or Polk's City Directory for the years 1932, 1960, 1964, 1968, 1971, 1976, 1981, 1992, 1995, 2000, 2005, 2010, and 2014.

No environmental RECs, CRECs, and/or HRECs were noted relative to the Property based on review of the historical city directories.

4.5 Other Environmental Records

Other environmental reports were not provided and/or reviewed as a part of this ESA.

Section 5: Site Reconnaissance

Mr. Brandon Reiff of Broadbent conducted a site reconnaissance of the Property on May 24, 2019 as discussed below. The weather was sunny and warm. Photographs of the Property and vicinity taken during the site reconnaissance are provided within Appendix E.

5.1 Hazardous Substances in Connection with Identified Uses

No hazardous substances or petroleum products in connection with current identified uses were observed within the boundaries of the Property during the site reconnaissance. No hazardous substances or petroleum products in connection with current identified uses were observed on properties adjoining the Property when observed from the Property or publicly accessible areas. As such, no RECs from hazardous substances or petroleum products in connection with current identified uses were known to be present on the Property at the time of the reconnaissance.

5.2 Hazardous Substance and Unidentified Substance Containers

No hazardous substance, unidentified substance, or petroleum products containers were observed within the boundaries of the Property during the site reconnaissance. No hazardous substance, unidentified substance, or petroleum product containers were observed on properties adjoining the Property when observed from the Property or publicly-accessible areas. As such, no RECs from hazardous substance or unidentified substance containers were known to be present on the Property at the time of the reconnaissance.

5.3 Storage Tanks

No evidence of existing or historic storage tanks, vent pipes, fill pipes, or access ways indicating USTs or ASTs was observed within the boundaries of the Property during the site reconnaissance or records review. No evidence of storage tanks was observed on properties adjoining the Property when observed from the Property or publicly-accessible areas. As such, no RECs from storage tanks were known to be present on the Property at the time of the reconnaissance.

5.4 Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) are a class of stable compounds that are toxic to the liver and are linked to cancer. The US EPA considers PCBs a Priority Pollutant under the Clean Water Act. The maximum contaminant level of PCBs allowed in drinking water is 0.5 parts per billion (ppb). Due to PCBs' toxicity and classification as a persistent organic pollutant, the United States prohibited the manufacture of PCBs after July 1, 1979 in the Toxic Substances Control Act (TSCA) of 1976. Until then, PCBs were widely used as coolant and dielectric insulating fluids for oil-filled electrical transformers and capacitors (such as those used in ballasts of old fluorescent and high-intensity discharge lights). PCBs were also used as plasticizers in paints and cements, stabilizing additives in flexible polyvinyl chloride (PVC) coatings of electrical wiring and electronic components, pesticide extenders, cutting oils, reactive flame retardants, lubricating oils, vacuum pump fluids, hydraulic fluids, and sealants for caulking in schools and commercial buildings.

Although manufacture was prohibited after 1979, PCBs already in commerce continued to be allowed in "totally enclosed uses" such as transformers and capacitors. Due to their extended working life, some oil-filled electrical equipment may still contain PCBs. The US EPA considers a product to be "PCB-Contaminated" if the oil contains between 50-500 parts per million (ppm), and to be a PCB product if more than 500 ppm. After July 1, 1979 and through 1998, the US EPA required new oil-filled electrical equipment to be marked "No

PCBs.” If an item is not so labeled, and no information is available as to the date of manufacture, an item might be assumed to contain PCBs until proven otherwise. PCB content may or may not be a matter of record with equipment or transformers belonging to a utility company.

No indication of leaks or releases from electrical equipment was observed during the site visit. No verifiable RECs, CRECs, and/or HRECs associated with PCBs were observed or known to be present on the Property at the time of the site reconnaissance.

5.5 Odors, Pools of Liquid

No pools of liquids and/or standing surface water were observed within the boundaries of the Property during the site reconnaissance. No strong, pungent, or noxious odors were noted during the site reconnaissance. No odors, pools of liquid, or standing surface water were observed on properties adjoining the Property when observed from the Property or publicly-accessible areas. As such, no RECs associated with potential odors, pools of liquid, or standing surface water were known to be present on the Property at the time of the site reconnaissance.

5.6 Pits, Ponds, Lagoons

No pits, ponds, or lagoons were observed within the boundaries of the Property during the site reconnaissance. No pits, ponds, or lagoons were observed on properties adjoining the Property when observed from the Property or publicly-accessible areas. As such, no RECs from pits, ponds, or lagoons were known to be present on the Property at the time of the reconnaissance.

5.7 Stained Soil/Pavement, Stressed Vegetation

Stained pavement was observed within the boundaries of the Property during the Property reconnaissance. However, the pavement staining was observed to be limited to paved vehicle parking areas and did not appear to affect non-paved surfaces. Additionally, stressed vegetation was not observed on the Property or properties adjoining the Property when observed from the Property or publicly-accessible areas. As such, no RECs from stressed vegetation or stained pavement were observed to be present on the Property at the time of site reconnaissance.

5.8 Indications of Solid Waste Disposal

Solid waste generated at the Property is disposed of in commercial dumpsters or recycled. An independent solid waste disposal/recycling contractor removes waste from the Property. No evidence of illegal dumping of solid waste was observed during the site reconnaissance. As such, no RECs from solid waste disposal were known to be present on the Property at the time of the reconnaissance.

5.9 Water, Storm Water, and Wastewater

Evidence of constructed storm water management drainage channels was observed along roadways adjacent to the Property. No evidence of on-site current or historic water supply wells, constructed storm water management systems, or historic wastewater systems was observed within the boundaries of the Property during the Property reconnaissance or discovered during interviews or records review. As such, no RECs from water, storm water, or wastewater were known to be present on the Property at the time of the reconnaissance.

5.10 Asbestos-Containing Material

Asbestos containing material (ACM) is commonly found in buildings constructed prior to the 1980s. Since the building was constructed in 1986 the potential for ACM within the buildings on the Property appears low. As such, no RECs from ACM were known to be present on the Property at the time of the reconnaissance.

5.11 Lead-Based Paint

Lead based paint (LBP) is a hazard in residential properties constructed prior to 1978. Since the existing buildings were constructed in 1986 the potential for LBP within the buildings on the Property appears low. As such, no RECs associated with LBP were known to be present on the Property at the time of the reconnaissance.

Section 6: Interviews

The following interviews were conducted in accordance with the requirements of ASTM E1527-13.

6.1 Interviews with Past and Present Owners and Occupants

Interviews were conducted with the following individuals. Use-Provided Information Questionnaires completed by the interviewees are provided in Appendix B.

<i>Role</i>	<i>Title</i>	<i>Name</i>	<i>Company</i>	<i>Method</i>	<i>Comments</i>
ESA User	Property Agent	Ms. Lori Miles	City of Reno	Questionnaire	No known environmental liens or contamination.

No RECs, CRECs, and/or HRECs were noted relative to the Property based on review of information gathered via interviews.

6.2 Interviews with State and/or Local Government Officials

The Washoe County Assessor's office was contacted. Documents reviewed at the Washoe County Assessor's online Property Assessment Database included a parcel map and supplemental site information. The structure on the Property was built in 1986 and the parcel consists of 1.135 acres. The owner of the property is listed as City of Reno. The APN of the site is identified as 007-296-22. The land use is listed as "General Commercial."

Broadbent contacted the Nevada Division of Environmental Protection (NDEP) and Washoe County Health Department (WCHD) with regard to reported environmental issues at the Property. No environmental records were found in regard to the subject Property. Email confirmation from WCHD is provided in Appendix B.

Section 7: Data Gaps

A data failure is failure to achieve the historical research objectives of ASTM E1527-13. A data gap is the incompleteness in activities required in this practice. The following data gaps occurred during conduct of this ESA: Recorded land title records were not provided by the client and County and City development records were not reviewed for the Property.

Based on the experience and good faith efforts of the environmental professionals responsible for conducting and reviewing this ESA, the above data gaps do not constitute a data failure and are not significant enough to affect identification of recognized environmental conditions on the Property.

Section 8: Findings

Findings of the ESA have been discussed throughout the body of this report and are tabulated below.

<i>Report Section</i>		<i>REC (Y/N)</i>	<i>CREC (Y/N)</i>	<i>HREC (Y/N)</i>	<i>De Minimis Conditions (Y/N)</i>	<i>Comments</i>
2	Site Description	N	N	N	N	CitiCenter Plaza Park
3	User-Provided Information	N	N	N	N	None
4	Records Review	N	N	N	N	None
5	Site Reconnaissance	N	N	N	N	None
6	Interviews	N	N	N	N	No known environmental contamination or liens.

As indicated above, this assessment has revealed no RECs, CRECs, or HRECs in connection with the Property.

Section 9: Conclusion

Broadbent has conducted this ESA in conformance with the scope and limitations of ASTM Practice E1527-13 for the Property located at 40 E. 4th St., Reno, NV. Exceptions to, or deviations from, this practice are described in Section 1.4 of this report.

This assessment has revealed no recognized environmental conditions in connection with the Property.

Section 10: Limitations & Exceptions of Assessment

Broadbent prepared this report for the exclusive use of NDEP and the City of Reno. This ESA is based on review of the site description, User-provided information, readily ascertainable environmental records, and results of site reconnaissance and interviews. This ESA was conducted in accordance with generally accepted environmental practices and procedures, as of the date of the report. Reputable environmental professionals practicing in this or similar localities conducted the services employing a degree of care and skill ordinarily exercised under similar circumstances. Findings and conclusions were made using methodologies employed per ASTM International Practice E1527-13 described by ASTM International as representing good commercial and customary practice for conducting an ESA of a property for the purpose of identifying RECs. No other warranties are implied or expressed.

No environmental sampling and associated analyses were undertaken for this ESA report. It is possible that variations in conditions could exist beyond points explored in this investigation.

This report represents professional opinion and judgment, which are dependent upon information obtained during the performance of consulting services. Environmental conditions may exist at the Property that cannot be identified. Conclusions are based, in part, on information supplied by others, the accuracy or sufficiency of which may not be independently reviewed. No investigation can be thorough enough to exclude the presence of hazardous materials at a given site; therefore, if no hazardous materials are identified during an assessment, such a finding should not be construed as a guarantee of the absence of such materials on a property, but rather the results of services conducted within project scope, cost, and other real limitations.

Opinions presented apply to conditions existing at the time services were conducted. Broadbent is unable to report on, or accurately predict events that may impact the Property following performance of the described services, whether occurring naturally or caused by the actions of others. Broadbent assumes no responsibility for conditions it is not authorized to investigate or conditions not generally recognized as environmentally unacceptable at the time services are conducted. Broadbent is not responsible for change in applicable environmental standards, practices, laws, or regulations following performance of services.

Section 11: Certification Statement & Signatures

As required by 40 CFR Part 312.21(d), I declare that, to the best of my professional knowledge and belief, I meet the definition of an Environmental Professional as defined in §312.10 of this part. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject Property. I have developed and conducted the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. My qualifications as an Environmental Professional are presented within Appendix F.

BROADBENT & ASSOCIATES, INC.

Signature:



Name: Brandon Reiff

Title: Senior Geologist

Date: August 2, 2019

Registration No.: 2300

State of: NV

Section 12: References

American Society for Testing and Materials, 6 November 2013. Designation E1527-13: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

Environmental Data Resources, 7 May 2019. The EDR Aerial Photo Decade Package: City of Reno Phase Is, 40 East 4th St., Reno, NV 89501 (Inquiry # 5643675.8).

Environmental Data Resources, 8 May 2019. The EDR – City Directory Image Report: City of Reno Phase Is, 40 East 4th St., Reno, NV 89501 (Inquiry # 5643675.5).

Environmental Data Resources, 7 May 2019. The EDR Radius Map Report with GeoCheck: City of Reno Phase Is, 40 East 4th St., Reno, NV 89501 (Inquiry # 5643675.2s).

Environmental Data Resources, 7 May 2019. Certified Sanborn Map Report: City of Reno Phase Is, 40 East 4th St., Reno, NV 89501 (Inquiry # 5643675.3).

Environmental Data Resources, 7 May 2019. EDR Historical Topographic Map Report: City of Reno Phase Is, 40 East 4th St., Reno, NV 89501 (Inquiry # 5643675.4).