Addendum No. 1

59th Street Corporation Yard Demolition and Remediation Project • November 2023

Powering forward. Together.

SMUD®

Addendum No. 1

59th Street Corporation Yard Demolition and Remediation Project • November 2023

Prepared for:

SMUD-Environmental Services
6201 S Street, Mailstop B209, Sacramento, CA 95817
P.O. Box 15830 MS B209, Sacramento, CA 95852-1830
Contact: Rob Ferrera

Prepared by:

Ascent Environmental
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Addendum No. 1 to the 59th Street Corporation Yard Demolition and Remediation Project IS/MND

November 2023
State Clearinghouse No. 2022010239

Background and Action Triggering the Addendum

This addendum to the SMUD 59th Street Corporation Demolition Yard and Remediation Project Initial Study/Mitigated Negative Declaration (IS/MND) addresses the potential impacts associated with modifications to the previously approved project and whether they may result in new or substantially more adverse impacts. More specifically, this addendum evaluates demolition of additional SMUD facilities and additional remediation of contaminated soils at 1708 59th Street in East Sacramento. The previously approved project analyzed in the IS/MND included building demolition, pavement removal, decommissioning of an existing pilot study soil vapor extraction (SVE) system, installation and operation of a new SVE system, and excavation and disposal of contaminated soil, and backfilling the excavation with clean fill material.

The modifications are related to additional remediation and cleanup at the corporation yard. Consistent with the California Environmental Quality Act (CEQA), SMUD has conducted additional review of the proposed demolition and remediation actions to determine whether the proposed changes would result in new or substantially more severe environmental impacts than those previously described for the 59th Street Corporation Demolition Yard and Remediation Project. Based on the results of the subsequent environmental analysis provided herein, in accordance with Section 15164 of the State CEQA Guidelines, SMUD has determined that preparation of an Addendum describing the proposed modifications/changes to the previously approved project and certified IS/MND would be appropriate.

Previous Environmental Analyses

The environmental process for the previously approved project involved the preparation of the following documents that are relevant to the consideration of the project:

- IS/MND for the 59th Street Corporation Demolition Yard and Remediation Project, January 2022, State Clearinghouse No. 2022010239

California Environmental Quality Act Guidelines Regarding an Addendum to an Approved Negative Declaration

Under CEQA, lead agencies must conduct an evaluation of proposed changes to a project in order to determine whether further environmental analysis is required (Public

Resources Code [PRC] Section 21166; CEQA Guidelines Section15162). Once an EIR or mitigated negative declaration has been completed for a project, a lead agency may not require preparation of a subsequent environmental review unless the conditions set forth in Public Resources Code section 21166 and CEQA Guidelines section 15162 are satisfied.

Pursuant to CEQA section 21166, when a previous environmental review for a project has been prepared and approved, no subsequent or supplemental environmental review shall be required unless:

(a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.

(b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.

(c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

CEQA Guidelines section 15162 further clarifies that:

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

(c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

If none of the conditions set forth in CEQA Guidelines section 15162(b) allowing a lead agency to prepare a subsequent negative declaration are met, CEQA Guidelines section 15164 authorizes the lead agency to prepare an addendum to the previously approved negative declaration. In relevant part, CEQA Guidelines section 15164 states:

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

This addendum is intended to evaluate and confirm CEQA compliance for the proposed modifications of the SMUD 59th Street Corporation Demolition Yard and Remediation Project, which would include additional remediation beyond what was described and evaluated in the SMUD 59th Street Corporation Demolition Yard and Remediation Project IS/MND. The addendum is intended to evaluate all environmental topic areas for any changes in circumstances or the project description, as compared to the adopted SMUD 59th Street Corporation Demolition Yard and Remediation Project IS/MND and determine whether such changes were or were not adequately covered in the adopted environmental documents. This addendum is not a traditional CEQA Environmental Checklist, per Appendix G of the CEQA Guidelines. As explained below, the purpose of

this addendum is to evaluate the checklist categories in terms of any “changed condition” (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different environmental impact significance conclusion from the SMUD 59th Street Corporation Demolition Yard and Remediation Project IS/MND, taking into consideration current regulatory requirements and implementing procedures. This addendum has been modified from the Appendix G presentation to focus on the pertinent issue areas and help answer the questions to be addressed pursuant to PRC Section 21166 and State CEQA Guidelines Sections 15162, 15164, and 15168.

TABLE OF CONTENTS

List of Figures

List of Tables

Appendices

Acronyms and Abbreviations

CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
City	City of Sacramento
dBA	A-weighted decibel
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FTA	Federal Transit Administration
GHG	greenhouse gas
IS/MND	Initial Study/Mitigation Negative Declaration
Leq	equivalent continuous sound level
Lmax	maximum noise level
MMRP	mitigation monitoring and reporting program
PCE	Tetrachloroethene
PRC	Public Resources Code
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SQIP	Stormwater Quality Improvement Plan
SVE	soil vapor extraction
SWPPP	stormwater best management practices
VOC	volatile organic compound

This page intentionally left blank.

1 Introduction and Project History

1.1 Introduction

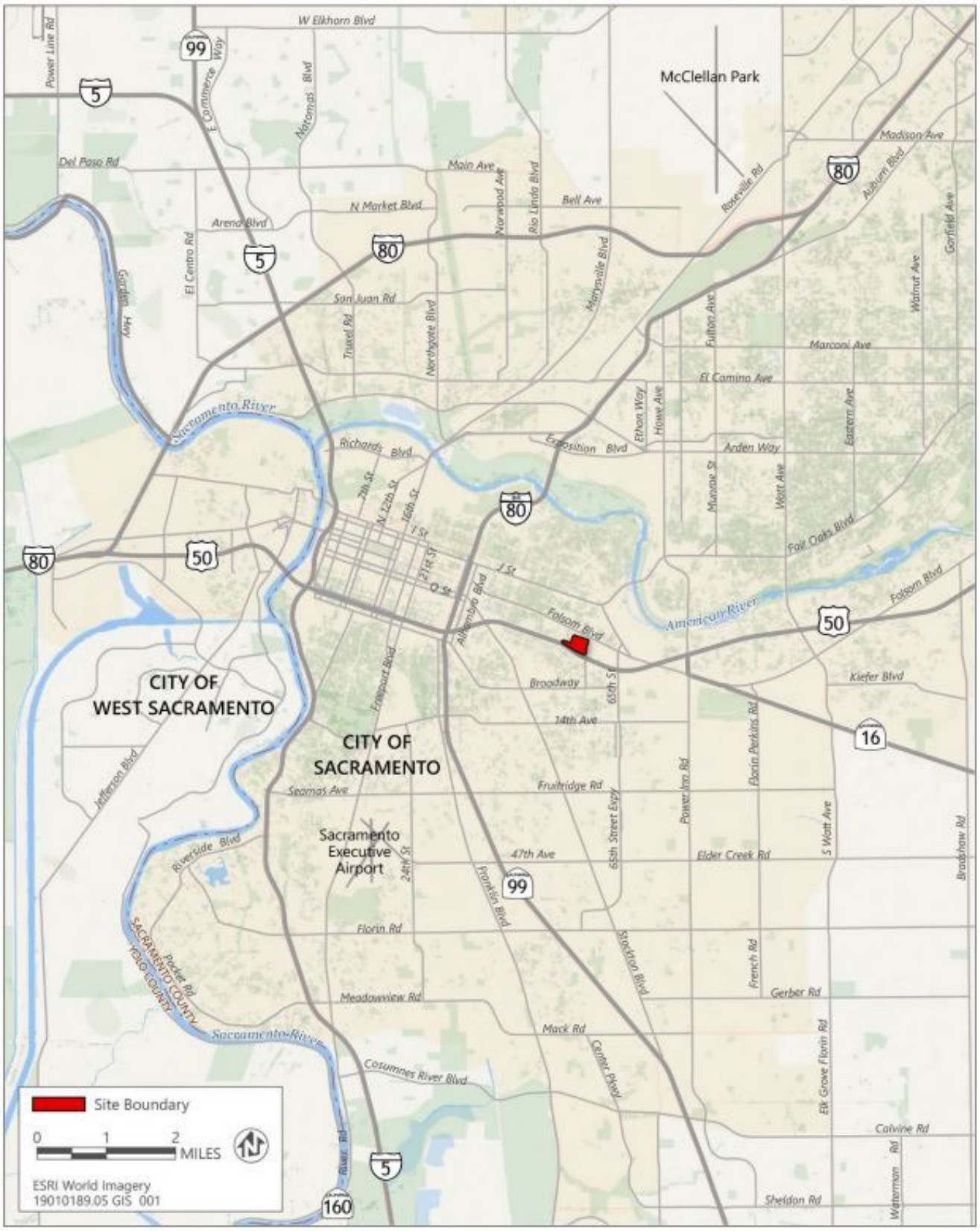
The Sacramento Municipal Utility District (SMUD) used the corporation yard located at 1708 59th Street, Sacramento, for general material and equipment storage including the storage of hazardous waste generated on-site or at other SMUD facilities between 1947 and 2012. SMUD proposed to conduct soil remediation at this corporation yard ("SMUD 59th Street Corporation Yard Demolition and Remediation Project" or "project"). The project, as evaluated in the 2022 project IS/MND (adopted on April 21, 2022), is located at 1708 59th Street in East Sacrament (see Figure 1 and Figure 2). The 2022 IS/MND evaluated building demolition, pavement removal, decommissioning of the existing pilot study soil vapor extractions (SVE) system, installation and operation of the SVE system, and excavation and disposal of contaminated soil, and backfilling the excavation with clean fill material.

1.2 Project History

In July 2012, the California Department of Toxic Substances Control (DTSC) completed a Resource Conservation and Recovery Act Facility Assessment for the project site. Kleinfelder performed a Phase II Environmental Site Assessment (ESA) on the project site in 2015. Tetrachloroethene (PCE) was detected in soil gas and arsenic was detected in soil at concentrations exceeding their respective regulatory screening criteria during Phase II ESA. From December 2018 to March 2019, AECOM conducted site investigation activities to further characterize the lateral and vertical extent of PCE in soil gas, soil, and groundwater, and arsenic in soil. The 2018 soil investigation found that PCE levels in soil gas were present at concentrations exceeding residential and commercial/industrial soil vapor screening levels, while concentrations in soil and groundwater did not exceed the soil vapor screening levels. It was determined that arsenic concentrations in soil exceeded background concentration levels.

AECOM completed a Phase I ESA for the project site in February 2020. The Phase I ESA report identified five recognized environmental conditions and one historical recognized environmental condition in connection with the project site. A polit study was conducted in 2020 to determine whether SVE would be an effective technology to address volatile organic compound (VOC) contamination in soil gas. An initial five-day pilot test was performed in May 2020. A long-term pilot test of the SVE system began in August 2020 and is ongoing.

SMUD proposed the project to install a full-scale SVE system to remediate VOC-impacted soil gas, and excavation and disposal of soil contaminated with arsenic, lead, and petroleum hydrocarbons. In April 2022, SMUD approved the project and adopted the project IS/MND.



Source: adapted by Ascent Environmental in 2021

Figure 1 Project Location

Source: adapted by Ascent Environmental in 2021
Figure 2 Project Site

Since the project approval in 2022, SMUD has since identified the need for additional work on the site, including demolition of the Office Building and ancillary structures, remediation of additional contaminated soil, and removal of all above-surface structures and lighting standards on the adjacent yard between the railroad tracks and Highway 50. As a result, SMUD determined that an addendum to the 2022 IS/MND for the proposed modifications to the previously approved project would be appropriate to document all environmental topic area changes and project-related changes, and whether such changes were adequately covered in the 2022 IS/MND.

1.3 Project Approval

Consistent with CEQA Guidelines Section 15052(2)(a), SMUD, as the agency responsible for carrying out the project, will serve as the lead agency for this addendum to the 2022 IS/MND.

1.4 Purpose of this Document

This addendum is intended to evaluate and confirm CEQA compliance for the proposed modifications of project, which would include additional demolition, soil excavation, and remediation beyond what was described and evaluated in the 2022 IS/MND. This addendum is organized as an environmental checklist and is intended to evaluate all environmental topic areas for any changes in circumstances or the project description, as compared to the adopted 2022 IS/MND, and determine whether such changes were or were not adequately covered in the adopted IS/MND. This checklist is not the traditional CEQA Environmental Checklist, that is found in Appendix G of the CEQA Guidelines. Rather, the purpose of this analysis is to evaluate the checklist categories in terms of any “changed condition” (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different environmental impact significance conclusion from the IS/MND. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to PRC Section 21166 and State CEQA Guidelines Sections 15162, 15164, and 15168.

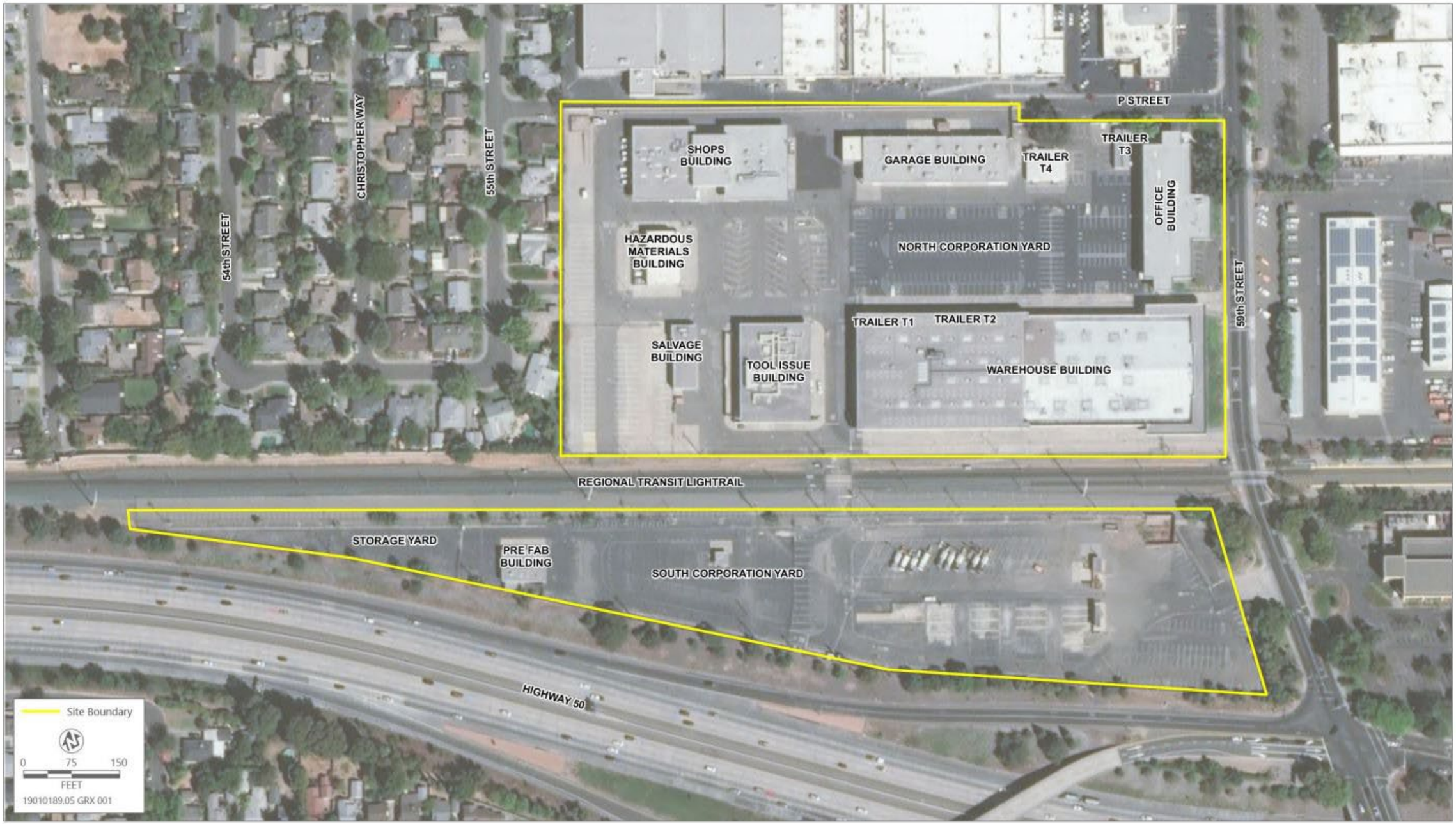
2 Project Description and Description of Proposed Modifications

2.1 Previously Approved Project

As evaluated in the 2022 IS/MND, SMUD previously approved a project that included the demolition of all buildings within the project site except the Office Building (see Figure 3), excavation and removal of soil, decommissioning of the existing pilot study SVE system, installation of new SVE system(s), and operation of the SVE system for four years.

The 2022 IS/MND evaluated the demolition of all buildings on-stie except the Office Building. Construction debris and non-hazardous soil would be disposed of at an appropriate landfill while metal would be recycled. SMUD also estimated that approximately 10,000 cubic yards of soil with excavation depths no greater than 15 feet would be removed to remediate the site for arsenic contamination in soil. Soil testing would be conducted to classify soil for disposal at a class I or II landfill (i.e., Recology Hay Road, Clean Harbors Buttonwillow, or Waste Management Kettleman Hills). During

construction, all trees would be protected with fencing and tree protection signs. The protective fence would be installed at the limits of the tree protection zone. The fencing would be removed after all construction activities near the trees are complete.



Source: Image provided by AECOM in 2021

Figure 3 Site Buildings

SMUD would potentially install one or more SVE systems to remove PCE soil vapor from the soil on the project site. The SVE system involves drilling one or more extraction wells into the contaminated soil to a depth above the water table, which must be deeper than 3 feet below the ground surface. Equipment (such as a blower or vacuum pump) would be attached to the wells to create a vacuum. The vacuum pulls air and vapors through the soil and up the well to the ground surface for treatment. The operation of the SVE system would last up to 4 years.

During the operation, there would be up to two worker visits to the site per week which would include the periodic removal of drums containing material generated by the SVE system.

In the 2022 IS/MND, it was estimated that the project construction activities would last approximately 8 months and operation would last for approximately 4 years following completion of the construction activities. Construction would be limited to the hours between 7 a.m. and 6 p.m. Monday through Saturday, and between the hours of 9 a.m. and 6 p.m. on Sunday. Night and weekend work is not anticipated for most of the project, though emergency situations may require nighttime or weekend activities. Operation of the SVE system is expected to last approximately 4 years following demolition and remediation activities.

2.2 Project Modifications

Since approval of the 2022 project, SMUD has initiated construction described in the 2022 IS/MND and partially completed the soil excavation activities. During the construction of the approved project, SMUD determined that the Office Building and other ancillary structures would require demolition to be able to appropriately remediate the remaining contaminated areas.

In order to fully remediate the project site, SUMD would demolish the Office Building and other ancillary structures located within the project site, including loading ramps, scale house, material storage areas, and light poles and other site features located between the railroad tracks and Highway 50. The additional demolition would occur within the previously evaluated project area boundaries identified in the 2022 IS/MND. The 2022 IS/MND stated that if additional contaminated soil impacts were found during excavation activities, SMUD would remove all contaminated soil to the maximum extent practicable. The excavated contaminated soil has exceeded the estimated 10,000 cubic yards and after demolition of the Office Building and other ancillary structures, the total excavated volume of soil is estimated to be about 67,000 cubic yards.

2.3 Construction

No changes in construction methods, including hours, equipment, personnel, are being proposed as part of this document and would be as described in Section 2.1, “Previously Approved Project,” above. The construction equipment and number of workers for the

proposed modifications would remain the same as the approved project. The proposed additional demolition activities are anticipated to begin in November 2023 and be completed by June 2024. Additional remediation work would continue through the remaining portion of 2024. Therefore, the overall construction duration would extend to the end of 2024.

2.4 Operation

The proposed modifications would not include new operational activities beyond what was described and evaluated in the 2022 IS/MND.

2.5 Project Objectives

The project objectives include the following:

- Be consistent with the intent of the previously approved project.
- Fully remediate the project site to protect public health regardless of any future development that may occur on the site.

2.6 Required Discretionary Actions

2.6.1 Lead Agency

As the lead agency, SMUD is responsible for approving the project modifications, at which time SMUD must also consider the addendum with the 2022 IS/MND, per State CEQA Guidelines Section 15164(d). SMUD shall procure the following permits from other agencies for this project:

State Permits

- State Water Resources Control Board/Central Valley Regional Water Quality Control Board: Construction Storm Water Discharge Permits for projects that disturb more than one acre of land. The permit would also require preparation and implementation of a stormwater pollution prevention plan (SWPPP) that would specify storm water best management practices.
- California Department of Transportation (Caltrans): Permits for movement of oversized or excessive loads on State Highways.

Local Permits

- Sacramento Metropolitan Air Quality Management District (SMAQMD): Authority to Construct/Permit to Operate pursuant to SMAQMD Regulations 2 (Rule 201 et seq.).

3 Affected Environment, Environmental Consequences, and Mitigation Measures

This section of the addendum analyzes the potential effects on the existing physical environment from implementation of the proposed modifications, as compared to the previously approved project. This analysis has been prepared to determine whether any of the conditions described above that would require preparation of a subsequent or supplemental mitigated negative declaration would occur as a result of the project modifications.

3.1 Approach to Environmental Analysis

As stated previously, SMUD has determined that, in accordance with PRC Section 21166 and Section 15164 of the State CEQA Guidelines, minor technical changes or additions to the 2022 IS/MND are necessary to address the modifications to the approved project.

An addendum to an adopted IS/MND is prepared when changes to a project are required, and the changes:

- will not result in any new significant environmental effects, and/or
- will not substantially increase the severity of previously identified effects.

The analysis of environmental effects provided below addresses the same impacts addressed in the 2022 IS/MND. The environmental analysis evaluates for each environmental topic area (e.g., land use, traffic, air quality) whether there are any changes in the project or the circumstances under which it would be undertaken that would result in new or substantially more severe environmental impacts than considered in the project's 2022 IS/MND.

3.1.1 Issues Not Analyzed Further in this Addendum

The proposed modifications described in this addendum constitute changes to the approved project that will not result in new significant impacts not previously identified in the 2022 IS/MND, nor a substantial increase in the severity or intensity of the significant impacts that were previously identified. The proposed modifications, compared to what was previously described and evaluated in the 2022 IS/MND, would not involve a substantial increase in use or type of equipment during construction nor a substantive increase in demolition and excavation activities. The proposed modifications would also occur within the same project site evaluated in the 2022 IS/MND. No new operational activities are proposed beyond what was described and evaluated in the 2022 IS/MND. For these reasons, an addendum was deemed appropriate for the proposed modifications. Resource areas that do not result in the need for additional detailed consideration are described below:

Aesthetics

Impacts related to aesthetics were evaluated in Section 3.1 of the 2022 IS/MND. It was concluded that implementation of the project would result in less than significant impact related to aesthetics because there are no scenic vistas and no designated state scenic highways within, adjacent to, or visible from the project site. The project does not propose any zoning changes and project uses would be consistent with existing site uses. Therefore, the project would not conflict with any zoning or scenic quality regulations. The project construction would not require nighttime lighting. Lighting at the project site as a result of project implementation would be similar to existing security lighting present at the project site. Therefore, no significant impact would occur.

The proposed modifications would occur within the same project site evaluated in the 2022 IS/MND. The proposed modifications would involve similar demolition and soil excavation activities as described and evaluated in the 2022 IS/MND, but on a smaller scale. Therefore, no new or more severe aesthetics effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Agriculture and Forest Resources

The 2022 IS/MND concluded that no impacts related to agriculture and forest resources would occur because the project site is developed and does not contain agricultural land or forest. The proposed modifications would occur within the same project site evaluated in the 2022 IS/MND. No impacts to agriculture and forest resources would occur. Therefore, no new or more severe aesthetics effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Air Quality

Impacts related to air quality were evaluated in Section 3.3, “Air Quality,” of the 2022 IS/MND. No potential significant air quality impacts were identified with implementation of Mitigation Measures 3.3-1 and 3.3-2 identified in the 2022 IS/MND. Since the adoption of the 2022 IS/MND, an Air Emission Update Memorandum (Appendix A) was prepared to evaluate the potential air quality emissions impacts associated with demolition of all onsite structures and remediation of the entire site (including the proposed modifications). Consistent with the methods discussed in the 2022 IS/MND, the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 computer program was utilized to estimate the daily and annual emissions associated with demolition of all onsite structures and remediation of the entire site. The emissions model also incorporated dust suppression best management practices as required by Mitigation Measures 3.3-1. As summarized in Table 1 below, the daily emissions for all pollutants and annual emissions for particulate matters would not exceed the SMAQMD CEQA thresholds. Therefore, the proposed modifications would not result in more server air quality emissions impacts than what was discussed in the 2022 IS/MND. No new or more severe air quality effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Table 1 Summary of Maximum Daily and Annual Construction Emissions

Years (2023-2024)	Maximum Daily Emissions (lbs/day)				Annual Emissions (tons/year)	
	ROG	NOx	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Demolition and Removal of Contaminated Soil	5	46	11	6	<1	<1
SMAQMD Threshold of Significance	None	85	80	82	14.6	15
Exceeds Threshold?	No	No	No	No	No	No

Notes: ROG = reactive organic gases; NOx = oxides of nitrogen; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; lbs/day = pounds per day'

Source: Modeled by Ascent, Inc. in 2023

Biological Resources

The 2022 IS/MND Section 3.4 evaluated impacts to biological resources, including special-status species, riparian habitat, sensitive natural communities, wetlands, and wildlife corridors. The proposed modifications would include demolition of the remaining building and ancillary structures on-site and soil excavation activities. Implementation of the proposed modifications would not alter the overall ground disturbance footprint (the project site) evaluated in the 2022 IS/MND. The proposed modifications would not change the extent of land disturbance from what was evaluated in the 2022 IS/MND and would not include tree removal. Therefore, impacts to biological resources would be similar to those analyzed in the 2022 IS/MND. Therefore, no new or more severe biological effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Energy

Impacts related to energy were evaluated in Section 3.7 of the 2022 IS/MND. No potential significant energy impacts were identified. The proposed modifications would use the same construction methods discussed in the 2022 IS/MND (e.g., equipment, construction duration, and number of workers) that would impact energy usage during constructure. The energy used for the proposed modifications would be temporary and would not create any long-term energy demand. Therefore, the proposed modifications would result in energy impacts that are similar to those analyzed in the 2022 IS/MND. The proposed modifications would not result in an inefficient, wasteful, or unnecessary consumption of energy resources and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This issue will not be discussed further.

Geology and Soils

Impacts related to geology and soils were evaluated in Section 3.8 of the 2022 IS/MND. No potential significant geology and soils impacts were identified. The proposed modifications would occur within the same project site evaluated in the 2022 IS/MND and would be subject to the same geological and soil conditions. No additional impacts or

increase in the severity of impacts would occur with implementation of the proposed modifications. This issue will not be discussed further.

Greenhouse Gases

Impacts related to greenhouse gas (GHG) emissions were evaluated in Section 3.9 of the 2022 IS/MND. No potentially significant GHG impacts were identified. The CalEEMod Version 2020.4.0 computer program was also utilized to estimate GHG emissions associated with demolition of all onsite structures and remediation of the entire site (including the proposed modifications). As summarized in Table 2 below, demolition of all onsite structures and remediation of the entire site would result in GHG emissions that exceed SMAQMD threshold. Therefore, GHG emissions related to the proposed modification would not result in more server impacts than what was discussed in the 2022 IS/MND. No new or more severe GHG emissions effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Table 2 Construction Emissions of GHG

Year	CO_2e (Metric Tons per year)
2022	329
2023	974
2024	698
Maximum	974
SMAQMD GHG threshold	1100

Notes: Unmitigated and mitigated construction emissions of GHG are the same when round to 0 decimals.

CO_2e means the number of metric tons of CO_2 emissions with the same global warming potential as one metric ton of another greenhouse gas.

Source: Modeled by Ascent, Inc. in 2023

Hydrology and Water Quality

Impacts related to hydrology and water quality were evaluated in Section 3.11 of the 2022 IS/MND. The 2022 IS/MND concluded that the project would have a less-than-significant impact to water quality standards, waste discharge requirements, groundwater supplies, existing drainage pattern, surface runoff, flood flows, and conflict with a water quality control plan and sustainable groundwater management plan. Similar to the approved project, the proposed modifications would not increase impervious surfaces on-site, would not alter the course of a stream or river, and would not substantially increase runoff from the project site during storm events. The proposed modifications would also include implementation of best management practices consistent with the City's water quality and watershed protection measures, as required by the SQIP, the Stormwater Quality Design Manual for the Sacramento Region, and General Construction Permit. Therefore, impacts to hydrology and water quality would be similar to those analyzed in the 2022 IS/MND. No new or more severe hydrology and water quality effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Land Use and Planning

Impacts related to land use and planning were evaluated in Section 3.12 of the 2022 IS/MND. The proposed modifications would occur within the same project site evaluated in the 2022 IS/MND and would be subject to the same land use plans, policies, and regulations discussed in the 2022 IS/MND. Similar to the approved project, the proposed modifications would not create structures, such as roadways, that could physically divide an established community. Therefore, impacts to land use and planning would be similar to those analyzed in the 2022 IS/MND. No new or more severe land use and planning effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Mineral Resources

As identified in the 2022 IS/MND, there are no known mineral resources present within the project site. No impact would occur. This issue will not be discussed further.

Population and Housing

The proposed modifications would not include new homes or businesses that would induce or generate population growth. No persons or homes would be displaced due to the implementation of the proposed modifications. No impact would occur. This issue will not be discussed further.

Public Services and Recreation

Impacts related to public services and recreation were evaluated in Sections 3.16 and 3.17 of the 2022 IS/MND. Because the project would not generate new population in the area, the 2022 IS/MND concluded that no impacts related to public services would occur. The proposed modification would include demolition of structures and soil excavation activities similar to what was described and evaluated in the 2022 IS/MND but on a smaller scale. Therefore, impacts to public services and recreation would be similar to those analyzed in the 2022 IS/MND. Therefore, no new or more severe public services and recreation effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Transportation and Circulation

Impacts related to transportation and circulation were evaluated in Section 3.18 of the 2022 IS/MND. The 2022 IS/MND concluded that the project impacts related to transportation would be less than significant because project demolition and remediation activities would be contained within the project site and would not interfere with existing vehicle, transit, bicycle, and pedestrian circulation other than adding a small amount of vehicle trips going to and coming from the project site. In addition, the project activities would not change any existing roads, including areas provided for emergency access and

would not result in any changes in road geometry or new uses. Therefore, no significant impacts related to transportation would occur.

The proposed modifications would occur within the same project site evaluated in the 2022 IS/MND and would use the same construction methods that could create traffic impact during construction. Impacts to transportation and circulation would be similar to those analyzed in the 2022 IS/MND. No new or more severe transportation and circulation effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Tribal Cultural Resources

Impacts related to tribal cultural resources were evaluated in Section 3.5 of the 2022 IS/MND. The CEQA process requires consultation with Native Americans under Assembly Bill 52. As stated in the 2022 IS/MND, SMUD invited interested Native American tribes that may be culturally or traditionally affiliated with the project site to conduct consultation. Implementation of Mitigation Measure 3.5-1 identified in the 2022 IS/MND would reduce any potential impacts to tribal cultural resources to a less-than-significant level. The proposed modifications would occur within the same project site evaluated in the 2022 IS/MND. Impacts to tribal cultural resources would be similar to those analyzed in the 2022 IS/MND. No new or more severe transportation and circulation effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Utilities and Service Systems

Impacts related to utilities and service systems were evaluated in Section 3.19 of the 2022 IS/MND. The 2022 IS/MND concluded that the project impacts related to utilities and service systems would be less than significant because the project would only cause a temporary increase in the generation of wastewater and solid waste during demolition and remediation activities. No additional water supplies are needed to serve the project. No anticipated water demand, wastewater generation, or solid waste generation would occur after construction. No new or expanded utilities and services systems would be required.

Similar to the approved project, the proposed modifications would only result in temporary increase in the generation of wastewater and solid waste during demolition and soil excavation activities. The proposed modification would not result in increase in growth that would exceed wastewater treatment requirements, require the construction of new or expansion of existing water or wastewater facilities, or generate substantial amounts of solid waste that would exceed landfill capacity. Therefore, impacts to utilities and service systems would be similar to those analyzed in the 2022 IS/MND. No new or more severe utilities and service systems effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

Wildfire

Impacts related to wildfire were evaluated in Section 3.20 of the 2022 IS/MND. Consistency with the approved project, the proposed modifications would occur within a local responsibility area that is designated as a non-Very High Fire Hazard Severity Zone. The proposed modifications would include demolition of the remaining structures on-site and additional soil excavation activities. It would not require land closures or other actions that would temporarily impair emergency response plans or evacuation plans. The proposed modifications would not introduce inappropriate uses or materials (e.g., fire-susceptible vegetation) to the project site that would increase the risk of wildland fire. Therefore, impacts to wildfire would be similar to those analyzed in the 2022 IS/MND. No new or more severe biological effects compared to the impacts identified in the 2022 IS/MND would occur. This issue will not be discussed further.

The 2022 IS/MND included mitigation measures, which were adopted as part of the original project approval and would be applicable to the proposed modifications. The adopted mitigation measures would be applicable to the proposed modification and are detailed in the 2022 IS/MND mitigation monitoring and reporting program (MMRP). The MMRP is included in Appendix B. With implementation of adopted mitigation measures, project impacts would be reduced to a less-than-significant level.

3.1.2 Issues Carried Forward for Further Analysis in This Addendum

The following issue areas have been evaluated in further detail in this addendum with respect to the proposed modifications to the approved project, because of the potential for the modifications to adversely affect these resources:

- Cultural Resources
- Hazards and Hazardous Materials
- Noise

3.2 Explanation of Further Analysis Categories

The purpose of this checklist, as tailored for cultural resources, hazards and hazardous materials, and noise, is to evaluate the categories in terms of any “changed condition” (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in environmental impact significance conclusions different from those found in the 2022 IS/MND. The row titles of the checklist include a range of environmental topics, which generally include those presented in Appendix G of the State CEQA Guidelines for cultural resources, hazards and hazardous materials, and noise. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to PRC Section 21166 and State CEQA Guidelines Section 15162. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change

in the condition or status of the impact because it was analyzed and addressed with mitigation measures in the project's 2022 IS/MND. For instance, the environmental categories might be answered with a "no" in the checklist because the impacts associated with the project were adequately addressed in the 2022 IS/MND and the environmental impact significance conclusions of the IS/MND remain applicable. The purpose of each column of the checklist is described below.

3.2.1 Where Impact was Analyzed

This column provides a cross-reference to the pages of the 2022 IS/MND where information and analysis may be found relative to the environmental issue listed under each topic.

3.2.2 Do Proposed Changes Involve New Significant Impacts?

The significance of the changes proposed to the approved project, as it is described in the 2022 IS/MND, is indicated in the columns to the right of the environmental issues.

3.2.3 Any New Circumstances Involving New or Substantially More Severe Significant Impacts?

Pursuant to Section 15162(a)(2) of the State CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (circumstances under which the project is undertaken) that have occurred subsequent to the prior environmental documents, which would result in the current project having new significant environmental impacts that were not considered in the prior environmental documents or having substantial increases in the severity of previously identified significant impacts.

3.2.4 Any New Information Requiring New Analysis or Verification?

Pursuant to Section 15162(a)(3)(A–D) of the State CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigation measures remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects or the project, but the project proponents decline to adopt the Mitigation Measure; or (D) that mitigation measures which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the Mitigation Measure, the question would be answered "yes" requiring the preparation of a subsequent IS/MND or supplement to the IS/MND. However, if the additional analysis completed as part of this modified Environmental Checklist review finds that the

conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or identified significant environmental impacts are not found to be substantially more severe, the question would be answered “no” and no additional IS/MND documentation (supplement to the IS/MND or subsequent IS/MND) would be required.

3.2.5 Do Prior Environmental Documents Mitigations Address/Resolve Impacts?

This column indicates whether the prior environmental documents and adopted CEQA Findings provide mitigation measures to address effects in the related impact category. In some cases, mitigation measures have already been implemented. A “yes” response will be provided in either instance. If “NA” is indicated, this Environmental Checklist Review concludes that there was no impact, or the impact was less than significant and, therefore, no mitigation measures are needed.

3.3 Cultural Resources

Environmental Issue Area	Where Impact Was Analyzed in the 2022 IS/MND	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
Cultural Resources. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	IS/MND Page 54	No	No	NA
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	IS/MND Pages 54 and 55	No	No	Yes, impact remains less than significant with application of adopted Mitigation Measure 3.6-1.
c. Disturb any human remains, including those interred outside the formal cemeteries?	IS/MND Pages 55 and 56	No	No	Yes, impact remains less than significant with application of adopted Mitigation Measure 3.6-2.

3.3.1 Discussion

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

The 2022 IS/MND identified no historical resources are located within the project site. The Office Building, also known as Building E – Distribution Services, was evaluated for the previously approved project, and recommended not eligible for listing in the National Register of Historic Places or the California Register of Historical Resources. The building does not possess important historical associations or architectural merit, is not associated with notable individuals, and does not have the potential to yield any additional important information about commercial office buildings or our history. Therefore, the Office Building is not considered a historical resource for the purposes of CEQA. The proposed modifications would occur within the same project site evaluated in the 2022 IS/MND. Therefore, there would be no impact to historical recourses, and no mitigation is required. No new significant or substantially more severe impacts would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

The 2022 IS/MND identified a segment of a historic-period archaeological site located within the project site. This segment of the resource that is located within the project site was evaluated and recommended not eligible for listing in the California Register of Historical Resources due to lack of integrity. Therefore, the archaeological site is not considered a resource under CEQA. However, ground disturbing activities within the project site could result in discovery or damage of previously undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. The impact was determined to be potentially significant. As a result, the 2022 IS/MND requires Mitigation Measure 3.6-1 to ensure that the impact would be reduced to a less-than-significant level.

Similar in type, though lesser in scale, to activities comprising the approved project, the proposed modifications would include demolition and soil excavation activities that require earth-moving and may disturb or destroy previously undisturbed and significant pre-contact archaeological deposits. Mitigation Measure 3.6-1, as identified in the 2022 IS/MND, would also be implemented for the proposed modifications to ensure that impact would be reduced to a less-than-significant level. No new significant or substantially more severe impacts would occur.

c) Disturb any human remains, including those interred outside the formal cemeteries?

No known past cemeteries or burials on the project site or immediate area were identified in the 2022 IS/MND. However, due to the earthmoving activities associated with project construction would occur, there is potential to encounter buried human remains. The impact was determined to be potentially significant. As a result, the 2022 IS/MND requires Mitigation Measure 3.6-2 to ensure that the impact would be reduced to a less-than-significant level.

Similar in type, though lesser in scale, to activities comprising the approved project, the proposed modifications would include demolition and soil excavation activities within the project site. Therefore, implementation of the proposed modifications could also result in the disturbance of undiscovered human remains. Through incorporation of Mitigation Measure 3.6-2, impacts to human remains would remain less than significant. No new significant or substantially more severe impacts would occur.

3.3.2 Mitigation Measures

The following mitigation measures were identified in the 2022 IS/MND analysis and would continue to remain applicable and shall be implemented (as adopted) if the proposed modifications are approved.

Mitigation Measure 3.6-1: Discovery of Archaeological Materials.

In the event that indigenous subsurface archaeological features or deposits, including locally darkened soil ("midden") or historic-period archaeological materials (such as concentrated deposits of bottles or bricks with makers marks, or other historic refuse), is uncovered during construction activities, all ground-disturbing activity within 100 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. SMUD will be notified of the potential find and a qualified archeologist shall be retained to investigate its significance. If the qualified archaeologist determines the archaeological material to be Native American in nature, Mitigation Measure 3.18-1 shall be implemented. If the find is determined to be significant by the archaeologist (i.e., because it is determined to constitute a unique archaeological resource), the archaeologist shall work with SMUD to develop and implement appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures could include but would not necessarily be limited to preservation in place, archival research, subsurface testing, or contiguous block unit excavation and data recovery.

Mitigation Measure 3.6-2: Discovery of Human Remains.

If human remains are discovered during any demolition/construction activities, potentially damaging ground-disturbing activities within 100 feet of the remains shall be halted immediately, and the project applicant shall notify the Sacramento County coroner and the NAHC immediately, according to Section 5097.98 of the PRC and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project applicant shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. Following the coroner's and NAHC's findings, the archaeologist, and the NAHC-designated Most Likely Descendant shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94.

3.3.3 Conclusion

Recent verification shows that there are no new or substantially more severe impacts to cultural resources related to implementation of the proposed modifications. The findings of the 2022 IS/MND remain valid, and no further analysis is required.

3.4 Hazards and Hazardous Materials

	Environmental Issue Area	Where Impact Was Analyzed in the 2022 IS/MND	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
Hazards and Hazardous Materials. Would the project:					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	IS/MND Pages 76 and 77	No	No	NA
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	IS/MND Page 77	No	No	NA
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	IS/MND Pages 77 and 78	No	No	NA
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	IS/MND Page 78	No	No	NA
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	IS/MND Page 78	No	No	NA
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	IS/MND Page 78	No	No	NA
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	IS/MND Page 79	No	No	NA

3.4.1 Discussion

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The previously approved project involved demolition of multiple buildings and remediation of on-site soil contamination. These activities involved the temporary storage, use, and transport of hazardous materials (e.g., fuel and lubricants). The use and storage of these materials could potentially expose and adversely affect workers, the public, or the environment due to improper handling or use. Demolition activities could result in lead-contaminated building materials that need to be transported to the appropriate disposal sites. As discussed in Section 1.2, "Project History," various assessments and investigations have identified hazardous materials within the project site. Contaminated materials and soil removed from the project site would also need to be transported to the appropriate disposal sites.

SMUD and their construction contractors would be required to comply with federal and state hazardous materials transportation laws including Code of Federal Regulations Title 49 ("Transportation"), Sections 100 to 185, and the California Environmental Protection Agency's Unified Program when trucking hazardous materials off-site. The Sacramento County Environmental Management Department is the designated Certified Unified Program Agency that manages regulated activities and is in accordance with the regulations included in the Unified Program (e.g., hazardous materials release response plans and inventories and the California Uniform Fire Code hazardous material management plans and inventories). The California Highway Patrol and Caltrans are responsible for enforcing regulations related to the transportation of hazardous materials on local roadways, and the use of these materials is regulated by DTSC, as outlined in California Code of Regulations Title 22. In addition, soil classified as hazardous waste would require disposal at a class I landfill. Site remediation activities would be required to adhere to all applicable regulations to protect worker safety, public health, and the environment. Therefore, the 2022 IS/MND concluded that compliance with these existing regulations would ensure that this impact would be less than significant.

Similar in type, though lesser in scale, to activities comprising the approved project, the proposed modifications would include demolition and soil excavation activities. The proposed modifications would be required to comply with the same regulations discussed in the 2022 IS/MND and summarized above to ensure that impact related to the routine transport, use, or disposal of hazardous materials would be less than significant. Therefore, no new significant or substantially more severe impacts would occur.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?

The 2022 IS/MND concluded that this impact would be less than significant with compliance with laws and regulations regarding the transport, use, and disposal of hazardous materials

as summarized in item a) above. The proposed modifications would include similar types of demolition and soil excavation activities as described and evaluated in the 2022 IS/MND but would be on a smaller scale. Implementation of the proposed modifications would be subject to the same regulations evaluated in the 2022 IS/MND and summarized in item a) above. Compliance with existing regulations would ensure that the proposed modifications would result in a less-than-significant impact related to significant hazard to the public or environment from the reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment. Therefore, no new significant or substantially more severe impacts would occur.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The 2022 IS/MND identified two schools located within one-quarter mile of the project site. Small quantities of hazardous materials such as fuels, oils, and lubricants would be used during project implementation and the project would remove existing hazardous materials from the project site. However, compliance with applicable regulations regarding hazardous materials would reduce the potential for hazardous emission within one-quarter mile of existing schools. The 2022 IS/MND concluded this impact would be less than significant, and no mitigation is required.

The proposed modifications would occur within the same project site as evaluated in the 2022 IS/MND. Implementation of the proposed modifications would result in the use and removal of the same types of hazardous materials as evaluated in the 2022 IS/MND but would be on a smaller scale. The same regulations regarding hazardous materials would apply to the proposed modifications to ensure that impacts related to emitting hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of a school would be less than significant. Therefore, no new significant or substantially more severe impacts would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The project site is identified on DTSC's Envirostor database as a hazardous waste disposal site. However, the project activities would remediate the site to DTSC standards, with the goal of closing the DTSC corrective action case for the site. The project would comply with existing laws and regulations related to the use, disposal, and transport of hazardous materials, as described in item a). Therefore, the 2022 IS/MND concluded this impact would be less than significant, and no mitigation is required.

The proposed modifications would demolish additional structures and remove additional soil within the project site to ensure that the site would be fully remediated to DTSC standards. The proposed modifications would also comply with existing laws and regulations related to the use, disposal, and transport of hazardous materials, as

described in item a) to ensure that the impacts related to being located on a hazardous materials site and creating a significant hazard to the public or the environment would be less than significant. Therefore, no impact would occur. No new significant or substantially more severe impacts would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

As discussed in the 2022 IS/MND, the project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip. No impact associated with aviation-related safety hazard for people residing or working in the project area would occur. The proposed modifications would occur within the same project site that was evaluated in the 2022 IS/MND. Therefore, the finding of the 2022 IS/MND remains valid, and no impact would occur. No new significant or substantially more severe impacts would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The 2022 IS/MND concluded that this impact would be less than significant because no lane closures or other actions that could interfere with or slow down emergency vehicles are expected to occur. In addition, any project activities that involve public right-of-way would be required to obtain an encroachment permit from either Caltrans or the City of Sacramento. As part of the encroachment permit application, SMUD is required to prepare and implement a traffic control plan, which includes temporary traffic control measures and maintenance of emergency access during construction. Once operational, all roads in the area would continue to operate as under pre-project conditions.

Implementation of the proposed modifications would not require lane closures and would be subject to the same requirements as discussed in the 2022 IS/MND to obtain an encroachment permit and implement a traffic control plan to ensure that the impact related to impeding emergency vehicles or adopted emergency evacuation plans would be less than significant. Therefore, no new significant or substantially more severe impacts would occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

As discussed in the 2022 IS/MND, the project site is located in a highly developed area of Sacramento and is not adjacent to wildlands. Therefore, implementation of the project would have no impact related to exposing people or structures to a significant risk of loss, injury, or death involving wildland fires. The proposed modifications would occur within the same project site that was evaluated in the 2022 IS/MND. Therefore, the finding of

the 2022 IS/MND remains valid, and no impact would occur. No new significant or substantially more severe impacts would occur.

3.4.2 Mitigation Measures

No mitigation is required.

3.4.3 Conclusion

Recent verification shows that there are no new or substantially more severe impacts to hazards and hazardous materials related to implementation of the proposed modifications. The findings of the 2022 IS/MND remain valid, and no further analysis is required.

3.5 Noise and Vibration

Environmental Issue Area	Where Impact Was Analyzed in the 2022 IS/MND	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
Noise. Would the project:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	IS/MND Pages 90 through 92	No	No	NA
b. Generation of excessive groundborne vibration or groundborne noise levels?	IS/MND Pages 92 and 93	No	No	NA
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	IS/MND Page 93	No	No	NA

3.5.1 Discussion

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

The 2022 IS/MND only evaluated the short-term ambient noise impacts associated with the project construction because no noise generating operational activities would occur after construction. The 2022 IS/MND utilized the reference noise levels from construction equipment compiled by Federal Transit Administration (FTA) to estimate noise levels resulting from the use of heavy-duty equipment for excavation of material, demolition of buildings, and material off-hauling during project construction. It was conservatively assumed that the loudest three pieces of equipment (a concrete saw, a dozer, and an excavator) would be operating simultaneously in close proximity to each other to generate a modeled maximum noise level during construction. Accounting for typical usage factors of individual pieces of equipment and activity types along with typical attenuation rates,

on-site construction related activities could result in hourly average noise levels of approximately 87 A-weighted decibels (dBA) at equivalent continuous sound level (Leq) and 92 dBA at maximum noise level (Lmax) at 50 feet. At a distance of 163 feet (i.e., the location of the nearest sensitive receptors to the west of the project site), construction related activities could result in hour average noise levels of approximately 73.3 dBA Leq and 78.6 dBA Lmax. The City's Municipal Code Section 8.28.060 exempts construction activities from the City's noise standards as long as the activities are limited to the hours of 7 a.m. to 6.p.m. Monday through Saturday, and 9 a.m. to 6 p.m. on Sunday. This exemption provides that construction equipment must include appropriately maintained exhaust and intake silencers. However, the City does not specify limits in terms of maximum noise levels that may occur during the allowable construction hours. The project construction activities occur within the allowable construction hours as discussed in Section 2.1, "Previously Approved Project." Therefore, the project would be in compliance with applicable noise standards.

Construction activities would also include hauling materials off-site to the appropriate disposal sites. The 2022 IS/MND assumed that up to 20 truck trips could occur per day (3 truck trips per hours) during demolition would be the most intensive truck hauling activity. Assuming up to three trucks per hour traveling on any given road, the project would not generate more noise than discussed above for multiple on-site construction equipment (i.e., 84 dBA Leq to 89 dBA Lmax) based on reference noise levels of 84 dBA Lmax for haul trucks compiled by FTA. Hauling activities would only occur for a short duration of time. Nearby receptors would not be exposed to truck hauling noise for long periods of time. All hauling activities would occur within the City's allowable construction hours, when noise is less likely to affect sensitive receptors, consistent with the City's noise standards.

Based on the analysis summarized above, the 2022 IS/MND concluded that the project would not generate a substantial temporary increase in ambient noise levels in excess of the City's noise standards. The impact would be less than significant, and no mitigation is required.

Similar in type, though lesser in scale, to activities comprising the approved project, the proposed modifications would include demolition of structures and soil excavation activities. The construction methods for the proposed modifications would be the same as described and evaluated in the 2022 IS/MND, including construction equipment, hours, personnel required, and hauling truck routes. Construction of the proposed modifications would generate similar construction noise levels as estimated in the 2022 IS/MND and would occur within the City's allowable construction hours. The proposed modifications would not generate a substantial temporary increase in ambient noise levels in excess of the City's noise standards. The temporary noise impact would be less than significant. The proposed modifications only include construction activities and would result in changes in the previously approved 4-year operation of the SVE system. Implementation of the proposed modifications would not result in noise impacts during operation. No new significant or substantially more severe impacts would occur.

b) Generation of excessive groundborne vibration or groundborne noise levels?

The 2022 IS/MND utilized the vibration source levels for construction equipment complied by FTA to estimate the maximum ground vibration levels result from project construction activities using heavy-duty equipment (e.g., large dozers). The 2022 IS/MND estimated that at a distance of 42 feet, construction activities would generate vibration levels exceeding the FTA threshold (80 vibration decibels) for sensitive uses and exceeding the Caltrans recommended level (0.089 inch/second peak particle velocity) for fragile buildings. However, construction activities would be located within 100 feet away from the nearest sensitive receptor and structure (located west of the project site) and hauling activities would occur at least 50 feet away from the existing sensitive receptors and structures. In addition, all construction activities would occur within the City's allowable construction hours. The 2022 IS/MND concluded that the construction impacts related to generation of excessive groundborne vibrations or groundborne noise levels would be less than significant. Continued project operation would not generate excessive vibration sources; therefore, operational impacts would be considered less than significant, and no new mitigation would be required.

The proposed modifications would include similar construction activities as evaluated in the 2022 IS/MND, including demolition, soil excavation, and hauling activities. The construction methods for the proposed modifications would be consistent with what was described and evaluated in the 2022 IS/MND, including construction equipment, hours, personnel required, and hauling truck routes. The proposed modifications would result in similar construction vibration levels as estimated in the 2022 IS/MND. The construction impacts related to generation of excessive groundborne vibrations or groundborne noise levels would be less than significant. The proposed modifications only include construction activities and would result in changes in the previously approved 4-year operation of the SVE system. Implementation of the proposed modifications would not result in vibration impacts during operation. No new significant or substantially more severe impacts would occur.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The 2022 IS/MND concluded that no impact regarding the exposure of people residing or working in the project area to excessive aircraft-related noise levels would occur because the project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The proposed modification would occur within the same project site evaluated in the 2022 IS/MND. Therefore, the finding of the 2022 IS/MND remains valid, and no impact would occur. No new significant or substantially more severe impacts would occur.

3.5.2 Mitigation Measures

No mitigation is required.

3.5.3 Conclusion

Recent verification shows that there are no new or substantially more severe impacts to noise related to implementation of the project. The findings of the 2022 IS/MND remain valid, and no further analysis is required.

4 List of Preparers

Sacramento Municipal Utility District

Keegan George ..... Senior Civil Engineer, Environmental Services
Rob Ferrera ..... Environmental Specialist, Environmental Services

Ascent Environmental

Mike Parker ..... Principal-in-Charge
Kirsten Burrowes ..... Project Manager
Yingying Cai ..... Environmental Planner
Gayiety Lane ..... Publications
Michele Mattei ..... Publications

5 Literature Cited

SMUD. 2022. *SMUD 59th Street Corporation Yard Demolition and Remediation Project IS/MND*.

Appendix A

SMUD 59th Street Corporation Yard Demolition and Remediation Project Air Emission Update Memorandum

Memo

455 Capitol Mall, Suite 300
Sacramento, CA 95814
916.444.7301

Date: June 27, 2023

To: Keegan George and Rob Ferrera, SMUD

From: Ascent Environmental, Inc.

Subject: 59th Street Corporation Yard Demolition and Remediation Air Emissions Update

---

1 INTRODUCTION AND PURPOSE

In April 2022, Ascent prepared an Initial Study/Mitigated Negative Declaration (IS/MND) for the 59th Street Corporation Yard Demolition and Remediation Project (project). The IS/MND included air quality emissions modeling that was prepared based on the anticipated construction activities and schedule for Phases I and II of the project at that time. The air quality assessment evaluated daily and annual emissions of criteria air pollutants and ozone precursors.

Since the time the IS/MND was prepared, Phase I of the project has been completed and based on site-specific conditions, additional soil hauling was required than what was anticipated in the IS/MND. Further, based on activities completed for Phase I, the anticipated soil hauling for Phase II and construction phasing schedule has also been modified from what the IS/MND evaluated. This memorandum provides updated emissions modeling that evaluates the activities that occurred for Phase I and the anticipated required demolition and soil remediation activities for Phase II. The memorandum includes a brief description of the methods, results, and a conclusion.

2 METHODS

The emissions modeling conducted in 2022 was done in accordance with Sacramento Metropolitan Air Quality Management District's (SMAQMD) CEQA guidance using the California Emissions Estimator Model (CalEEMod) recommended at the time (Version 2020.4.0). For ease of comparison between this updated analysis and the previous results, the same CalEEMod version was used. The emissions model was run using project-specific information (e.g., building demolition square footage, material import/export quantities, haul distance, phasing schedule) to override CalEEMod defaults. The emissions model incorporates dust suppression best management practices (i.e., watering exposed surfaces twice daily), as required by Mitigation Measure 3.3-2 of the IS/MND. Specific inputs are summarized below. For a complete summary of modeling inputs and outputs, see Attachment A.

2.1 SCHEDULE

The following table summarizes the construction schedule used in the emissions model.

Table 1. Modeled Phases and Durations

Phase	Start Date	End Date	Phase Duration (Days)
Phase I Demolition	7/18/2022	9/30/2022	55
Phase I Remediation	10/3/2022	8/31/2023	239
Phase II Demolition	9/1/2023	8/31/2024	261
Phase II Remediation	10/16/2023	3/11/2024	106

Notes: Model assumes 5 workdays per week to generate total phase duration.

2.2 MATERIAL QUANTITIES

The following table summarizes the inputs used to model haul (export/import) truck activity based on project-specific demolition and soil remediation activities. Soil export/import would occur for both remediation phases and demolition would require off-hauling of debris. A one-way trip distance of 37 miles to Hay Road Landfill was used for all material hauling as hauling activities were modeled together during the remediation phases, resulting in a conservative emissions estimate. Default "Vender Trip" lengths in CalEEMod were adjusted to a one-way trip distance of 17 miles from the Teichert Grant Line Road Facility.

Table 2. Haul Quantities

Phase	Total Haul trips	Export	Import
Phase I Demolition	195 (off-haul)	42,930 building sf	NA
Phase I Remediation	4,750 (export + import)	30,000 soil cy	30,000 soil cy
Phase II Demolition	691 (off-haul)	152,022 building sf	NA
Phase II Remediation	5,855 (export + import)	37,000 soil cy	37,000 soil cy

Notes: CY= cubic yards; SF= square fee; NA= not applicable.

3 RESULTS AND CONCLUSION

Using the methods described above, the following table summarizes both daily and annual emissions and compares them to the adopted SMAQMD CEQA thresholds of significance.

Table 3. Summary of Maximum Daily and Annual Construction Emissions

Years (2023-2024)	Maximum Daily Emissions (lbs/day)				Annual Emissions (tons/year)	
	ROG	NO_X	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Demolition and Removal of Contaminated Soil	5	46	11	6	<1	<1
SMAQMD Threshold of Significance	None	85	80	82	14.6	15
Exceeds Threshold?	No	No	No	No	No	No

Notes: ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; lbs/day = pounds per day; SMAQMD = Sacramento Metropolitan Air Quality Management District

Source: Modeled by Ascent Environmental in 2023.

CONCLUSION

As shown above in Table 3, emissions modeling conducted for the previously completed Phase I and anticipated activities associated with Phase II of the project, would not exceed adopted SMAQMD thresholds of significance for any criteria air pollutant or ozone precursor. No new impacts, that were not already disclosed during preparation of the IS/MND, would occur.

Appendix B

SMUD 59th Street Corporation Yard
Demolition and Remediation Project
IS/MND
Mitigation Monitoring and
Reporting Program

4 Mitigation Monitoring and Reporting Program

4.1 Introduction

This mitigation monitoring and reporting program summarizes identified mitigation measures, implementation schedule, and responsible parties for the SMUD 59th Street Corporation Yard Demolition and Remediation Project (project). SMUD will use this mitigation monitoring and reporting program to ensure that identified mitigation measures, adopted as conditions of project approval, are implemented appropriately. This monitoring program meets the requirements of CEQA Guidelines Section 15074(d), which mandates preparation of monitoring provisions for the implementation of mitigation assigned as part of project approval or adoption.

4.2 Mitigation Implementation and Monitoring

SMUD will be responsible for monitoring the implementation of mitigation measures designed to minimize impacts associated with the project. While SMUD has ultimate responsibility for ensuring implementation, others may be assigned the responsibility of actually implementing the mitigation. SMUD will retain the primary responsibility for ensuring that the project meets the requirements of this mitigation plan and other permit conditions imposed by participating regulatory agencies.

SMUD will designate specific personnel who will be responsible for monitoring implementation of the mitigation that will occur during project construction. The designated personnel will be responsible for submitting documentation and reports to SMUD on a schedule consistent with the mitigation measure and in a manner necessary for demonstrating compliance with mitigation requirements. SMUD will ensure that the designated personnel have authority to require implementation of mitigation requirements and will be capable of terminating project construction activities found to be inconsistent with mitigation objectives or project approval conditions.

SMUD and its appointed contractor will also be responsible for ensuring that its construction personnel understand their responsibilities for adhering to the performance requirements of the mitigation plan and other contractual requirements related to the implementation of mitigation as part of project construction. In addition to the prescribed mitigation measures, Table 3-1 (Mitigation Monitoring and Reporting Program) lists each identified environmental resource being affected, the corresponding monitoring and reporting requirement, and the party responsible for ensuring implementation of the mitigation measure and monitoring effort.

4.3 Mitigation Enforcement

SMUD will be responsible for enforcing mitigation measures. If alternative measures are identified that would be equally effective in mitigating the identified impacts, implementation of these alternative measures will not occur until agreed upon by SMUD.

Table 3-1: Mitigation Monitoring and Reporting Program			
Checklist Section	**Environmental Criteria**	**Mitigation Measure**	**Timing**
Air Quality	a, b	***Mitigation Measure 3.3-1: Implement SMAQMD Basic Construction Emission Control Practices.*** *During demolition and remediation, the contractor shall comply with and implement SMAQMD's Basic Construction Emission Control Practices, which includes SMAQMD-recommended BMPs and BACT, for controlling fugitive dust emissions. Measures to be implemented include the following:* • *Water all exposed surfaces at least two times daily <u>during working hours to keep soil moist and prevent dust</u>. Exposed surfaces include, but are not limited to, soil piles, graded areas, unpaved parking areas, staging areas, and access roads. <u>Contaminated stockpiles to be covered at all times. If a contaminated stockpile becomes inactive (no work for 14 days), it will continue to be covered.</u>* • *<u>Fabric will be installed on the perimeter chainlink fence to prevent fugitive dust from the site.</u>* • *<u>Monitor air quality for fugitive dust emissions.</u> Cover or maintain at least two (2) feet of freeboard space on haul trucks transporting soil, sand, or other loose material on the site. Cover any haul trucks that will be traveling along freeways or major roadways.* • *Use wet power vacuum street sweepers to remove any visible track-out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.*	Throughout construction activities

Table 3-1: Mitigation Monitoring and Reporting Program			
Checklist Section	**Environmental Criteria**	**Mitigation Measure**	**Timing**
		• *Limit vehicle speed on unpaved roads to 15 miles per hour.* • *All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.* • *Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (required by California Code of Regulations Title 13, Sections 2449[d][3] and 2485). Provide clear signage that posts this requirement for workers at the entrances to the site.* • *Maintain all equipment in proper working condition according to manufacturer's specifications. Equipment will be checked by a certified mechanic and determined to be running in proper condition before it is operated.* ***Mitigation Measure 3.3-2: Implement SMAQMD Basic Construction Emission Control Practices.*** *During operations, SMUD shall comply with and implement SMAQMD's BMPs for Operational PM Emissions to support the use of the SMAQMD's non-zero thresholds of significance. Measures to be implemented include the following:* • *Compliance with District rules that control operational PM and NO_x emissions. Reference rules regarding wood burning devices, boilers, water heaters, generators and other PM control rules that may apply to equipment to be located at the project.*	

Table 3-1: Mitigation Monitoring and Reporting Program			
Checklist Section	**Environmental Criteria**	**Mitigation Measure**	**Timing**
		• *Compliance with anti-idling regulations for diesel powered commercial motor vehicles (greater than 10,000 gross vehicular weight rating). This BMP focuses on non-residential land use projects (retail and industrial) that would attract these vehicles. The current requirements include limiting idling time to 5 minutes and installing technologies on the vehicles that support anti-idling.*	
Biological Resources	a	***Mitigation Measure 3.4-1: Avoid disturbance of nesting birds*** *Ornamental vegetation shall be removed within the project site outside of the nesting bird season (September 1 – January 31).* *If vegetation removal, demolition activities, or construction will occur during the nesting season (between February 1 and August 31), a SMUD project biologist/biological monitor will conduct pre-construction nesting bird surveys to determine if birds are nesting in the work area or within 0.25 mile for Swainson's hawk, and within 500 feet of the work area for non-listed raptors, and within the project site for all other nesting birds.* *The pre-construction nesting bird surveys will identify on-site bird species and any nest-building behavior. If no nesting Swainson's hawks are found on or within 0.25 mile or no nesting raptors are found within 500 feet or no nesting birds are found within the project site during the pre-construction clearance surveys, construction activities may proceed as scheduled.* *If active Swainson's hawk nests are found within the nest survey area, the construction contractor shall avoid impacts on such nests by establishing a no-disturbance buffer around the nest. Monitoring*	Prior to construction activities.

Table 3-1: Mitigation Monitoring and Reporting Program			
Checklist Section	**Environmental Criteria**	**Mitigation Measure**	**Timing**
		of the nest by a qualified biologist during construction activities shall be required if the activity has the potential to adversely affect the nest. Based on guidance for determining a project's potential for impacting Swainson's hawks (Swainson's hawk Technical Advisory Committee 2000), projects in urban areas have a low risk of adversely affecting nests greater than 600 feet from project activities. Therefore, 600 feet is anticipated to be the adequate buffer size for protecting nesting Swainson's hawks from disturbances associated with the proposed project. However, the qualified biologist shall consult with the California Department of Fish and Wildlife to confirm the adequacy of the no-disturbance buffer and/or if the buffer is reduced based on the biologist professional judgement. *If an active nest of non-listed raptor species is found in or within 500 feet of the project site during construction, a "No Construction" buffer zone will be established around the active nest. Similarly, if a passerine nest is found within the project site during construction a "No Construction" buffer zone will be established around the active nest (usually 500 feet for raptors) to minimize the potential for disturbance of the nesting activity. The project biologist/biological monitor will determine and flag the appropriate buffer size required, based on the species, specific situation, tolerances of the species, and the nest location. Project activities will resume in the buffer area when the project biologist/biological monitor has determined that the nest(s) is (are) no longer active or the biologist has determined that with implementation of an appropriate buffer, work activities would not disturb the bird's nesting behavior.* *If special-status bird species are found nesting on or within 500 feet of the project site, the project biologist/biological monitor shall notify*	

Table 3-1: Mitigation Monitoring and Reporting Program			
Checklist Section	**Environmental Criteria**	**Mitigation Measure**	**Timing**
		SMUD's project manager to notify CDFW or USFWS, as appropriate, within 24 hours of first nesting observation.	
Tribal Cultural Resources	a, b	***Mitigation Measure 3.5-1*** *If any suspected Tribal cultural resources are discovered during ground disturbing construction activities, including midden soil, artifacts, chipped stone, exotic rock (nonnative), or unusual amounts of baked clay, shell, or bone, all work shall cease within 100 feet of the find. Appropriate Tribal representative(s) shall be immediately notified and shall determine if the find is a Tribal cultural resource (pursuant to PRC Section 21074). The Tribal representative will make recommendations for further evaluation and treatment, as necessary.* *Preservation in place is the preferred alternative under CEQA and the Tribes' protocols, and every effort must be made to preserve the resources in place, including through project redesign. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, returning objects to a location within the project vicinity where they will not be subject to future impacts. The Tribe does not consider curation of tribal cultural resources to be appropriate or respectful and request that materials not be permanently curated, unless approved by the Tribe. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil.*	Throughout construction activities.

Table 3-1: Mitigation Monitoring and Reporting Program			
Checklist Section	**Environmental Criteria**	**Mitigation Measure**	**Timing**
Cultural Resources	a, b	***Mitigation Measure 3.6-1: Discovery of Archaeological Materials*** *In the event that indigenous subsurface archaeological features or deposits, including locally darkened soil ("midden") or historic-period archaeological materials (such as concentrated deposits of bottles or bricks with makers marks, or other historic refuse), is uncovered during construction activities, all ground-disturbing activity within 100 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. SMUD will be notified of the potential find and a qualified archeologist shall be retained to investigate its significance. If the qualified archaeologist determines the archaeological material to be Native American in nature, Mitigation Measure 3.18-1 shall be implemented. If the find is determined to be significant by the archaeologist (i.e., because it is determined to constitute a unique archaeological resource), the archaeologist shall work with SMUD to develop and implement appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures could include but would not necessarily be limited to preservation in place, archival research, subsurface testing, or contiguous block unit excavation and data recovery.*	Throughout construction activities.
Cultural Resources	c	***Mitigation Measure 3.6-2: Discovery of Human Remains*** *If human remains are discovered during any demolition/construction activities, potentially damaging ground-disturbing activities within 100 feet of the remains shall be halted immediately, and the project applicant shall notify the Sacramento County coroner and the NAHC immediately, according to Section 5097.98 of the PRC and Section 7050.5 of California's Health and Safety Code. If the remains are*	Throughout construction activities.

Table 3-1: Mitigation Monitoring and Reporting Program			
Checklist Section	**Environmental Criteria**	**Mitigation Measure**	**Timing**
		determined by the NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project applicant shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. Following the coroner's and NAHC's findings, the archaeologist, and the NAHC-designated Most Likely Descendant shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94.	
Traffic and Transportation	a, c, d	***Mitigation Measure 3.17-1: Traffic Control Plan*** *Prior to project construction within or adjacent to public roadways, SMUD's construction contractor shall develop a traffic control plan for the project and submit the plan to the City of Sacramento's Department of Public Works. The plan shall identify temporary lane, sidewalk, bicycle lane, and transit stop closures and provide information regarding how access and connectivity will be maintained during construction activities. The plan shall include details regarding traffic controls that would be employed, including signage, detours, and flaggers. The traffic control plan shall be implemented by the contractor during construction to allow for the safe passage of vehicles, pedestrians, and cyclists along the project route.*	Prior to work within or adjacent to public roadways.

This page intentionally left blank.