

**Addendum to the Mitigated Negative Declaration
for the Recess Self-Storage & Washington Crossing Flex Industrial
State Clearinghouse Number: 2019049085**

1. INTRODUCTION:

Pursuant to the provisions of the California Environmental Quality Act (CEQA), on May 16, 2019, the City of Roseville (City) adopted the Recess Self-Storage and Washington Crossing Flex Industrial Mitigated Negative Declaration (MND) for the approval of the Design Review Permit to allow the development of a 115,065 square-foot self-storage facility. The MND evaluated the impacts of the 9.36-acre area (Project site) from combining thirteen parcels which will be merged and re-subdivided into three parcels. During the site investigation prior to local land use approvals, soil contamination was identified at the Project site and mitigation measures were included in the MND to address anticipated future remediation activities. After receiving and responding to comments received, the City filed a Notice of Determination on May 23, 2019.

In accordance to CEQA Guidelines [Cal. Code Regs., Title 14, §15164 and §15162], DTSC is amending the MND to incorporate the recommended remedy selection from the Removal Action Workplan (RAW) which involves excavation and offsite land disposal of lead contaminated soil. This Addendum to the previously adopted MND is prepared to address activities associated with proposed soil excavation and offsite disposal of the lead contaminated soil identified in the RAW.

The American Olean Tile Company began operations in 1974. The company manufactured glazed ceramic tile using several hazardous materials. Water from the manufacturing processes was drained to three evaporation ponds. Glazed ceramic tile manufacturing ceased in about 1976 and was replaced with quarry tile manufacturing.

In 1991, a Report of Due Diligence Investigation for the Project site was performed by Dufour Environmental & Resource Management. The effort involved a limited Phase I environmental investigation as well as limited Phase II investigations including the drilling of four soil borings. Boring 1 was drilled within the vicinity of former underground fuel storage tanks. Boring 2 was drilled within the vicinity of surface impoundments. Boring 3 was drilled south of the building to determine if groundwater had been impacted by the underground fuel storage tanks and surface impoundments. Boring 4 was also drilled south of the building near a storm drain outfall of the American Olean roof drains. Petroleum hydrocarbons were not identified within 25 feet below ground surface (bgs) in the underground tank area, or at depths of 7 and 12 feet bgs within the surface impoundment area. Borings 3 and 4 revealed no near surface hydrocarbon contamination.

In 1992, a contractor for American Olean Tile Company identified issues of environmental concern in four areas including the evaporation ponds. Excavation of lead contaminated soils from the pond areas occurred in 1994.

In 1997, the results of further investigations conducted by Kleinfelder & Associates (Kleinfelder) were presented in the Soil Sampling and Analysis Report, Former American Olean Tile, dated December 15, 1997. This investigative effort was performed on the property because bank financing would not be provided for the property until it was removed from the DTSC's CalSites listing. DTSC requested additional work in four locations including the former evaporation ponds (impoundments), the former underground storage tank area, the soil stockpile, and at an area of stressed vegetation. Sampling identified petroleum hydrocarbons were not present in the underground tank area but elevated concentrations of lead in surface and shallow soil were present in a soil stockpile south of the evaporation ponds and beneath gutter downspouts on the northside of the building.

In January 1998, Kleinfelder performed additional sampling and testing of Project site surface soils located south and west of the northern evaporation pond, south of the building, and beneath a building downspout. Elevated concentrations of lead were found in soils beneath the building downspout and in soil located south of the excavated evaporation pond. Kleinfelder then directed limited excavation of lead contaminated soils at these two locations. An unusual blue and pink colored clay was reportedly present in the excavation south of the northern evaporation pond. DTSC indicated additional confirmation soil samples should be collected in the excavation area to confirm that the lead contaminated soil had been removed. These soil samples lead Kleinfelder to conclude that significant concentrations of lead remain in soils and that additional assessment of the soil at the American Olean site should be conducted using a sampling grid approach.

In May 2000, Raney Geotechnical completed a Preliminary Environmental Assessment (PEA) Report for lead contaminated soils at the Project site. The PEA included advancing 80 borings and sampling and testing soil from 109 locations on the Project site. A total of 234 soil samples were obtained and analyzed for total lead from the former evaporation ponds area. Most samples were obtained between the surface and a depth of five feet; however, several deeper samples also were obtained. In general, the sampling and analysis revealed that the extent of soil with significantly elevated lead concentrations in the evaporation ponds area is very limited.

A Land Use Covenant was recorded in October 2000 to restrict the future development and use of approximately 2.652 acres located in the central portion of the Project site. DTSC and the current owner (Symphony Dreams, LLC) entered into a Voluntary Cleanup Agreement (VCA) on September 27, 2018 and revised the VCA on September 23, 2019 in order to redevelop the property into office buildings and a self-storage facility.

The Project site is currently empty and has been subdivided into 13 parcels. The Project site already has various site improvements which were made in anticipation of future development. Existing improvements include a two-way access road encircling the entire site, a driveway stub into the middle of the site from Washington Boulevard, a stub connection to the two-way access road, sewer mains within the access road and along the frontage of the site, and some site grading.

Pursuant to CEQA Guidelines [Cal. Code Regs., Title 14, §15164(c)], this Addendum is not being circulated for public review. A Notice of Determination will be filed with the State of California Office of Planning and Research, State Clearinghouse, upon project approval.

2. PROJECT DESCRIPTION:

In preparation for the construction of development of a 115,065 square-foot self-storage facility located in the industrial zoned area of the City of Roseville, DTSC proposes to approve a RAW in order to remove lead contaminated soil from surface and shallow depths and dispose of the soil at EPA licensed Class I & Class landfills.

3. PURPOSE OF ADDENDUM AND CEQA REQUIREMENTS:

The purpose of this Addendum is to update the project description provided in the MND to include the removal activities described in the RAW and to address any potential environmental effects of the activities described in the RAW. This document has been prepared in accordance with the CEQA Guidelines, [Cal. Code Regs., Title 14, §15164 and §15162].

The CEQA Guidelines [Cal. Code Regs., Title 14, §15162(a)] provide that, for a project covered by a certified EIR or adopted Negative Declaration, preparation of a Subsequent EIR or Negative Declaration rather than an Addendum is required only if one or more of the following conditions occur:

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant 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 or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of the 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 of the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*
 - a) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*

- b) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;*
- 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 measure or alternative; or*
- d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternative.*

Cal. Code Regs., Title 14, § 15164(b) of the CEQA Guidelines states:

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.

Based on the analysis presented herein, DTSC has determined that an Addendum to the MND is the appropriate CEQA document to address the activities described in the RAW given that none of the conditions described in the CEQA Guidelines [Cal. Code Regs., Title 14, section 15162] calling for the preparation of a Subsequent EIR or Negative Declaration have occurred. This environmental analysis relies on the analyses completed in the MND and directly references the MND as appropriate.

4. APPLICATION OF PREVIOUS ENVIRONMENTAL DOCUMENTATION TO THE REMEDIAL ACTION WORKPLAN:

The MND evaluated the potential impacts associated with the proposed development, including construction and operational use of one (1) three-story building and two (2) two-story buildings, a 47,060 square-foot industrial flex facility consisting of two (2) single-story buildings and the associated parking, lighting, and landscaping (Figure 1). The City's May 23, 2019 Notice of Determination certified that with the implementation of the mitigation measures detailed in the monitoring program identified in the MND, impacts from the project will not have a significant environmental effect.

Although some potential environmental impacts associated with the removal activities described in the RAW were analyzed in the MND, the activities were not included in the project description. The following removal activities discussed in the RAW are proposed by the project Proponent to address the Chemical of Concern (COC) at the Project site and will be considered part of the project description associated with the MND:

- Implement the selected remedy for the Recess Self-Storage & Washington Crossing Flex Industrial which includes the excavation of lead from three areas within the Project site and transportation of the soils to an offsite landfill location;
- Remove soil using conventional grading and construction equipment and dust suppression, stockpiling, storm water best management practices, and perimeter air monitoring; and
- Excavate soil ranging from a depth of surface soil to approximately 2.5 feet below ground surface. The total volume of the impacted soils that expected to be removed is 415 cubic yards.

During site investigations, it was discovered that soil contamination on the Project site was elevated above screening thresholds. In response, the City of Roseville identified DTSC as the Responsible Agency for approval of the cleanup activities including a Soil Management Plan, Site Specific Health and Safety Plan, and the RAW.

As the Responsible Agency for the removal activity, DTSC will approve a RAW to remove the contaminated soil. The measures incorporated by reference to this Addendum and expanded to include the details of those discussed in the RAW.

5. ENVIRONMENTAL IMPACT ANALYSIS:

The MND addresses some of the potential impacts from the remedies proposed in the RAW, but it does not completely address the following activities: excavation of lead from three areas, onsite stockpiling of excavated soil and testing, and offsite disposal of the contaminated soil. The RAW activities are confined to the Project site and comply with the same regulatory requirements and implement the same components in the MND that serve to mitigate impacts on the environment. Based on these considerations, for the following impact issue areas there would be no change to the analyses and findings presented in the MND: Aesthetics, Energy, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems, and Wildfires. In addition, the RAW activities would have no new impacts associated with: Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, Transportation, and Tribal Cultural Resources. Therefore, the impacts associated with the RAW for these issue areas would be within the scope of impacts identified in the MND, as described below. Mitigation Measures from the MND and applicable to the RAW activities are also described below.

a. AIR QUALITY:

MND: The City of Roseville is located in the Sacramento Valley Air Basin (SVAB) and under the jurisdiction of the Placer County Air Pollution Control District (PCAPCD). The SVAB is within the Sacramento Federal Ozone Non-Attainment Area. Under the Clean Air Act, the city has been designated a "serious non-attainment" area for the federal 8-hour ozone standard, "non-attainment" for the state ozone standard, and a "non-attainment" area for the federal and state PM10 standard (particulate matter less than 10 microns in diameter). Within Placer County, the PCAPCD is responsible for ensuring that emission standards are not violated.

The project-related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation. To assist in making this determination, the PCAPCD adopted thresholds of significance, which were developed by considering both the health-based ambient air quality standards and the attainment strategies outlined in the State Implementation Plan. The PCAPCD-recommended significance threshold for reactive organic gases (ROG) and nitrogen oxides (NOx) is 82 pounds daily during construction and 55 pounds daily during operation, and for particulate matter (PM) is 82 pounds per day during both construction and operation. For all other constituents, significance is determined based on the concentration-based limits in the Federal and State Ambient Air Quality Standards.

The project involves construction of 162,000 square feet of non-residential buildings and approximately four acres of paved area (parking lots and drive aisles) on a 9.36-acre site. The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to model the construction emissions of the project. According to the model results, the project will result in maximum daily emissions of 38 lb/day of ROG and 46 lb/day of NOx during construction; these emissions fall below the 82-lb/day thresholds for these constituents. Therefore, construction air quality impacts are less than significant.

RAW: RAW activities will utilize heavy construction equipment for the completion of soil excavation that may extend to five feet below ground surface. Soil transportation will be completed by approximately 20 truckloads following standard Dust Control Measures, as identified in the RAW under the section 5.18 of the RAW's Site Specific Health and Safety Plan (HASP). Specifically, the HASP requires implementation of the following activities to control dust:

- Using water to maintain soil moisture to reduce the potential for dust generation;
- Covering all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard;
- Paving, applying water as necessary, or applying (nontoxic) soil stabilizers to all unpaved access roads, parking areas, and staging areas at construction sites;
- Sweeping daily (with water sweepers) all paved access roads, parking areas, and staging areas;

- Limiting vehicle speeds within the Restricted Area (2.652 acres located in the center of the site) to 5 miles per hour (mph);
- Installing erosion control measures to prevent silt runoff to public roadways;
- Storing and covering excavated odorous soil with 40-mil polyethylene wrap in a secured manner to prevent exposure to humans and the environment;
- Storing excavated odorous soil at the site of generation or at a temporary storage location on a base composed of impermeable material, and immediately covering with the same material or other suitable material so as to minimize the infiltration of precipitation, volatilization of contaminants, or erosion of the stockpile;
- Using and securing cover material that possesses the necessary physical strength to resist tearing by wind.
- Immediately repairing, replacing, or re-securing of any failed materials or procedures used in employing the base layer or cover layer so as to minimize precipitation infiltration, volatilization, or erosion/runoff of the excavated soil; and
- Suspending work upon sustained wind gusts in excess of 25 mph. However, at the discretion of the construction manager in consultation with the project manager, work could resume if the types of work being performed do not generate large amounts of dust.

Due to the limited quantity of Project-specific emissions and the temporary nature of the RAW activities, the remediation action is not expected to produce a cumulatively significant impact. In addition, activities required of the RAW HASP, including perimeter air monitoring and dust and odor control, would ensure potential air quality impacts remain at a less-than-significant level. Therefore, the RAW activities would not create any new significant impacts to Air Quality and no additional mitigation measures are required.

b. BIOLOGICAL RESOURCES:

MND: The project site is dominated by non-native grasses and herbaceous annuals. City of Roseville staff conducted a site visit, and determined there were no trees, shrubs, or evidence of wetlands or other protected waters on the site. As discussed in the Initial Study, the project site is an infill property in an urbanized setting, which does not contain native trees, shrubs, wetland resources, or other sensitive natural communities which are protected by federal, state or local policies. The site only supports non-native grasses and herbaceous annuals, and the site is not connected to any open space resources or other resources which could provide habitat to special status species. The entire site is surrounded by a paved roadway and other development. Therefore, the project would have no impacts on special status species, sensitive communities, riparian habitat, or wetlands.

The City of Roseville includes an interconnected network of open space corridors and preserves located throughout the City to ensure that the movement of wildlife is not substantially impeded as the City develops. The development of the Project site will not negatively impact these existing and planned open space corridors, nor is the Project site located in an area that has been designated by the City, United States Fish and Wildlife, or California Department of Fish and Wildlife as vital or important for the movement of wildlife or the use of native wildlife nursery sites. There are no Habitat Conservation Plans; Natural Community Conservation Plans; or other approved local, regional, or state habitat conservation plans that apply to the Project site.

RAW: The Project site remains undeveloped and in similar condition to the environmental analysis reviewed in the 2019 Initial Study (Figure 2). Activities associated with the RAW will disturb a smaller portion of the Project site than the proposed storage facility. Activities will include soil excavation and the use of heavy construction equipment but will not disturb any areas beyond those analyzed as part of the MND. Activities will limit vegetation removal and habitat disturbance to three areas as identified in the RAW. Activities associated with implementing the RAW would not create any new significant impacts to Biological Resources and no additional mitigation measures are required.

c. CULTURAL RESOURCES:

MND: As described within the Open Space and Conservation Element of the City of Roseville General Plan, the Roseville region was within the territory of the Nisenan (also Southern Maidu or Valley Maidu). Two large permanent Nisenan habitation sites have been identified and protected within the City's open space (in Maidu Park). Numerous smaller cultural resources, such as midden deposits and bedrock mortars, have also been recorded in the City. The gold rush which began in 1848 marked another settlement period, and evidence of Roseville's ranching and mining past are still found today. Historic features include rock walls, ditches, low terraces, and other remnants of settlement and activity. A majority of documented sites within the City are located in areas designated for open space uses.

The Project site contained three industrial wastewater evaporation ponds, starting in the 1970s. In 1992, lead contamination of the soil was discovered and deep excavation and removal of contaminated soil occurred as part of remediation activities. The originally proposed projects involved taking the remaining contaminated soil on the Project site (on the southern side of the site) and spreading that soil evenly over the lower-elevation portions of the site, and then placing clean fill on top. In summary, the Project site has been the subject of deep excavation and use, during which time no subsurface resources were encountered.

RAW: The proposed site excavation will be no deeper than what previously occurred during investigations. The soil on the site will be graded and spread over the lower-elevation areas on the Project site in order to create a restoration of the site for future development. The project is not anticipating backfill as site grading activities will closely follow the soil excavation limits. No cultural resources are known to exist on the Project site, and given the historic ground-disturbing activities on the site and the proposed activities, the likelihood of cultural resource presence is extremely low. However, the City applies standard mitigation for the discovery of unanticipated resources even to projects determined to have less-than-significant impacts. The City's standard measure requires an immediate cessation of work and then contact with the appropriate agencies to address the cultural resource before work can resume. Project-specific impacts would remain less than significant.

d. GREEN HOUSE GAS

MND: Greenhouse gases trap heat in the earth's atmosphere. The principal greenhouse gases (GHGs) that enter the atmosphere because of human activities are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. As explained by the United States Environmental Protection Agency (EPA), global average temperature has increased by more than 1.5 degrees Fahrenheit since the late 1800s, and most of the warming of the past half century has been caused by human emissions. The City has taken proactive steps to reduce greenhouse gas emissions, which include the introduction of General Plan policies to reduce emissions, changes to City operations, and climate action initiatives.

Greenhouse gases are primarily emitted as a result of vehicle operation associated with trips to and from a Project site and energy consumption from operation of the buildings. Greenhouse gases from vehicles is assessed based on the vehicle miles traveled (VMT) resulting from a project on a Citywide basis. Residential projects, destination centers (e.g., regional mall), and major employers tend to increase VMT in a study area either by adding new residents traveling in an area or by encouraging longer trip lengths and drawing in trips from a broader regional area. However, non-residential projects and neighborhood-serving uses (e.g. neighborhood parks) tend to lower VMT in a study area because they do not generate new trips within the study area but they divert existing trips. These trips are diverted because the new use location is closer to home, on their way to another destination (e.g. work), or is otherwise more convenient.

The proposed project involves construction of a self-storage facility and light industrial buildings, which are typical non-residential uses with low traffic generation and located in an infill area. As discussed, the project would not be anticipated to increase VMT because it would provide services in closer proximity to developed residential areas of the city. Therefore, the analysis focuses on the emissions which would result from operation of the proposed buildings. CalEEMod Version 2016.3.2 was used to calculate the operational emissions of the project which includes energy to run the building, area emissions such as landscape equipment to maintain the site, and water and wastewater energy demands. According to the CalEEMod results, the project would result in annual emissions of 903 MT CO₂e.

Construction related GHG emissions occur at one point in time and, therefore, are not typically expected to significantly contribute to climate change. Climate change is a cumulative effect that occurs over time as emissions increase on a year-to-year basis due to increases in developed area and other factors. Construction emissions are a one-time emission source which end once the project is built. However, the proposed project's construction related GHG has been estimated and have been amortized over the life of the project (25 years, based on PCAPCD guidance). The CalEEMod results indicate total construction emissions of 451 MT CO₂e, which amortized result in an additional 18 MT CO₂e per year over the life of the project. Including both construction and operational emissions, the project will generate 921 MT CO₂e annually which is below the PCAPCD screening threshold for GHG of 1,100 MT of CO₂e annually. Thus, project-generated GHG emissions would not conflict with, and are consistent with, the State goals listed in AB32 and policies and regulation adopted by the California Air Resources Board pursuant to AB32. This impact is considered less than significant.

RAW: Based on the average freight truck in the U.S. emits 161.8 grams of CO₂ per ton-mile, the amount of greenhouse gases generated from the planned work (approximately 20 truckloads to complete the activities) would be less than 1 MT CO₂e per year. This additional contribution in GHG emissions for hauling contaminated soil offsite will not cause the project to exceed the PCAPCD screening threshold for GHG. Impacts related to GHG emissions will remain a less-than-significant level.

e. HAZARDS AND HAZARDOUS MATERIALS:

MND: The site is listed as a hazardous materials site by DTSC, due to lead contamination of the soil. The existing building to the west of the site was originally built and operated by the Olean Tile Company beginning in 1974. The building is currently occupied by several uses which include California Bottling Company, Arena Softball and Beermann's Brewing Company among others. During operation of the Olean Tile Company, a number of hazardous substances, including lead, were used during the manufacturing of ceramic tile. As part of the production process, water used to create the tiles was drained to evaporation ponds on the project site. In 1992, lead contamination was discovered in the former location of the evaporation ponds. The majority of the contaminated areas were remediated, with the exception of 2.652 acres located in the center of the site. These 2.652 acres are on the DTSC list of contaminated sites (American Olean Tile Company, 31320001, 8250 Industrial Avenue).

A Covenant to Restrict Use of Property was recorded in October of 2000 with the Placer County Recorder. The deed restricts several uses from operating in the contaminated area, including:

- a residence, including any mobile home or factory-built housing, constructed or installed for use as residential human habitation,
- a hospital,
- a public or private school for persons under 21 years of age, and
- a day care center for children.

The deed requires approval of a Soil Management Plan and a Health and Safety Plan by DTSC prior to any activity within the restricted area that has the potential to disturb the soil at any depth. The applicant has prepared a Soil Management Plan and Health and Safety Plan, which were approved in October 2018 and posted to the DTSC public record for this site: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=31320001. The soil management plan indicates that any contaminated soils will be redistributed on the site, and then covered with clean fill.

RAW: The identified COC is lead in surface and shallow soils that exceeds unrestricted use/unrestricted exposure levels. Three areas are identified for excavation locations with an approximate total of 415 cubic yards to be removed. Once excavated, the soil will be stockpiled for on-site for testing and then transported off-site to an EPA licensed Class I or Class II landfill. The RAW will comply with the associated Health and Safety Plan; will obtain all applicable local permits for soil excavation, grading, and capping activities; utilize decontamination procedures; comply with the Dust Prevention Control Plan; and conduct perimeter air monitoring to reduce exposure to nearby sensitive receptors and the adjacent community.

f. NOISE:

MND: Noise generated from the use of heavy machinery during the construction phase of the Project may noticeably increase noise over current ambient conditions. However, any potentially significant noise impact would be reduced to a less-than-significant level with the implementation of mitigation measures and conformance to the City's Noise Ordinance standards which require construction activities to occur during daytime hours (between the hours of 7:00 AM and 7:00 PM Monday through Friday, and between the hours of 8:00 AM and 8:00 PM Saturday and Sunday).

RAW: RAW activities will utilize similar construction equipment for the completion of soil remediation. On-site use of heavy equipment for excavation is expected to increase ambient noise but will not permanently exceed the City's Noise Ordinance's noise thresholds. Any RAW impact will be temporary and further reduced by compliance to the City's Noise Ordinance. Therefore, the activities proposed in the RAW would not create any new impacts, and no additional mitigation measures are required.

g. TRANSPORTATION:

MND: The project site is located on Washington Boulevard, a four-lane arterial roadway with center turning median. It is surrounded on the remaining sides by a private two-lane access road which loops around the Project site and connects on either end of the loop by full-access driveways onto Washington Boulevard. An existing driveway stub on Washington Boulevard is located at the center of the site frontage. Washington Boulevard includes on-street, striped bicycle lanes and separated sidewalks.

The proposed project is non-residential development of an infill property surrounded by existing development. The project does not include any unique characteristics which would draw in regional traffic or would prompt longer trips. The project would locate services and employment in proximity to existing developed areas and, therefore, would have a neutral or positive impact on VMT. Project impacts to traffic would be less than significant.

The project has been reviewed by the City Engineering and City Fire Department staff and has been found to be consistent with the City's Design Standards. Furthermore, standard conditions of approval added to all City project require compliance with Fire Codes and other design standards. Compliance with existing City regulations ensure that impacts remain at a less-than-significant level.

RAW: Due to the short and temporary nature of the remediation action, RAW activities are not expected to significantly increase local traffic or regional traffic. Approximately 20 total truck trips will be routed for the transportation of contaminated soil along arterial roads and interstate highways in accordance with the RAW's Transportation Plan. Due to the small quantity of truck trips, close proximity to the interstate, and the temporary nature of the RAW activities, the remediation action is not expected to substantially affect the existing traffic levels or conditions in the Project area. Therefore, the activities proposed in the RAW would not result in any significant impacts related to traffic and transportation.

h. TRIBAL CULTURAL RESOURCES:

MND: As described within the Open Space and Conservation Element of the City of Roseville General Plan, the Roseville region was within the territory of the Nisenan (also Southern Maidu or Valley Maidu). Two large, permanent Nisenan habitation sites have been identified and protected within the City's open space (in Maidu Park). Numerous smaller cultural resources, such as midden deposits and bedrock mortars, have also been recorded in the City. A majority of documented sites within the City are located in areas designated for open space uses.

As discussed in the Cultural Resources section, the site was the location of industrial wastewater evaporations ponds, which were then removed, followed by extensive excavation for soil remediation. There are no known or eligible historical resources on the site. However, the City typically applies standard mitigation for the discovery of unanticipated resources even to projects determined to have less than significant impacts. The measure requires an immediate cessation of work and contact with the appropriate agencies to address the resource before work can resume. Project-specific impacts are less than significant.

Notice of the proposed project was mailed to tribes which had requested such notice pursuant to AB 52, on February 7, 2019. The City received a letter from the Shingle Springs Band of Miwok Indians on February 19, 2019, which included a request for any reports prepared for the project and a request to be informed if any unanticipated resources are discovered on the site; the letter did not include a request for consultation. A request for consultation was received from the United Auburn Indian Community (UAIC) on March 15, 2019. In further e-mail correspondence, the UAIC indicated that they remain concerned about the potential for discovery of tribal cultural resources, in case any original soil may still be present on the site. For this reason, the UAIC requested an unanticipated discoveries mitigation measure and requested the ability to have UAIC staff review the site after ground disturbance, to check for any resources (the UAIC indicated they have staff with certification to work in areas of hazardous material contamination). This mitigation measure was added as Mitigation Measure TCR-1. Although no resources are known to occur on the site, mitigation for unanticipated discoveries will ensure proper treatment should a resource be discovered, and measure TCR-1 will provide for UAIC review of the site for resource presence. Project-specific impacts are less than significant.

RAW: The proposed site excavation will be no deeper than what previously occurred during investigations. The soil on the site will be graded and spread over the lower-elevation areas on the Project site in order to create a restoration of the site for future development. The project is not anticipating backfill as site grading activities will closely follow the soil excavation limits. No tribal cultural resources are known to exist on the Project site and, given the historic ground-disturbing activities on the site and the proposed activities, the likelihood of cultural resource presence is extremely low. However, the City applies standard mitigation for the discovery of unanticipated resources even to projects determined to have less-than-significant impacts. The City's standard measure requires an immediate cessation of work and then contact with the appropriate agencies to address the cultural resource before work can resume. In addition, the RAW activities would comply with requirements of mitigation measure TCR-1 in the MND. Project-specific impacts would remain less than significant.

6. CONCLUSION:

Activities proposed in the RAW would not alter the significance levels or mitigation measures for Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, Transportation, or Tribal Cultural Resources, as presented in the MND. Further, there will not be any no new significant impacts or a substantial increase in the severity of impacts as compared to the issues identified in the MND. No additional mitigation measures are required for the RAW. Therefore, the impacts for the RAW are within the scope of impacts identified in the MND, and the MND adequately addressed all impacts of the project.

Based on the above, DTSC finds that an Addendum to the previously adopted MND is the appropriate CEQA document for the RAW activities pursuant to the CEQA Guidelines [Cal. Code Regs., Title 14, § 15164(b)] because none of the conditions described in the CEQA Guidelines [Cal. Code Regs., Title 14, §15162] apply. This Addendum has appropriately disclosed the potential impacts from the RAW activities and will be included as part of the CEQA record for the RAW. A Notice of Determination for this Addendum to the MND will be filed with the California State Clearinghouse within the State of California Office of Planning and Research.

CERTIFICATION

I hereby certify that the statements furnished above present the data and information required for this evaluation to the best of my ability and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

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DTSC Project Manager Signature		Date
<hr/>	<hr/>	<hr/>
Peter MacNicholl	Project Manager	916-255-3713
Name	Title	Peter.macnicholl@dtsc.ca.gov
		Telephone/Email Address

<hr/>		<hr/>
DTSC Branch Chief Signature		Date
<hr/>	<hr/>	<hr/>
Charlie Ridenour	Supervising Hazardous Substances - Engineer II	916-255-6442
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Figure 1 – Proposed Project Area



Figure 2 – Current Site Conditions

