

Addendum to the
Station East Residential / Mixed Use Project
Environmental Impact Report

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Site Mitigation and Restoration Program
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SECTION 1

Introduction

1.1 OVERVIEW

On April 27, 2021, the City of Union City adopted the *Station East Residential/Mixed Use Project Environmental Impact Report* (Station East EIR) (SCH # 2020039032), which analyzed the potential environmental impacts associated with demolition of onsite buildings and surface parking lots to develop up to 974 new residential units (i.e., apartments, condominiums, townhome-style condominiums) and approximately 30,800 sf of commercial space. The project site, located near 7th Street and Decoto Road in Union City, would include 11 planning areas (PAs) with 33 residential buildings and one community building. Most of the 34 proposed buildings would be between three and five stories tall. Vehicular access to the project site would be via Decoto Road on the north side of the project site, 7th Street on the east side of the project site, and Bradford Way and Zwissig Way on the south side of the project site. Three community parks, one tot lot, and one outdoor amphitheater would be located on the project site. Pedestrian, bicycle, and vehicular access would be provided throughout the project site. The proposed project would include approximately 1,791 parking spaces for vehicles (including 190 on-street surface stalls) and 458 parking spaces for bicycles, both long term (i.e., bike storage facilities) and short term (i.e., bicycle racks), and other vehicle, pedestrian, and bicyclist improvements. Construction of the proposed project would begin in mid-2023 and occur in two phases over approximately 4.5 years, with anticipated completion in late 2025.

Subsequent to the adoption of the Station East EIR, a Remedial Action Plan (RAP) were prepared for the necessary removal of impacted soil and soil vapor from the Project site and for the necessary operation of a vapor intrusion mitigation system (VIMS) and Soil Vapor Extraction (SVE) system at the Project site. Refer to Section 2 for detailed Project description. Therefore, this Addendum is necessary to address the potential environmental effects of the cleanup action as it relates to the mixed-use project evaluated in the prior Station East EIR.

1.2 PURPOSE OF ADDENDUM

According to Section 15164 of the State California Environmental Quality Act (CEQA) Guidelines, an addendum to a previously certified environmental impact report (EIR) or adopted negative declaration shall be prepared by a lead or responsible agency if changes or additions to the document are necessary but none of the conditions described in Section 15162 requiring the preparation of a subsequent EIR or negative declaration are applicable. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration. The decision-making body considers the addendum with the final EIR or adopted negative declaration prior to making a decision on the project, as modified.

Section 15162 of the State CEQA Guidelines states that, for a project covered by a certified EIR or adopted negative declaration, preparation of a subsequent EIR or negative declaration is required if one or more of the following conditions occur:

1. Substantial changes are proposed in the project that 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 that 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.

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 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;
 - 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 that 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.

This Addendum will show that some changes or additions to the prior EIR are necessary but none of the conditions requiring the preparation of a subsequent negative declaration are applicable.

1.3 SCOPE AND CONTENT OF ADDENDUM

This Addendum has been prepared in accordance with the requirements of CEQA (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (Title 14 California Code of Regulations Section 15000 et seq.). This Addendum considers each of the environmental impacts that were analyzed in the prior Station East EIR and focuses on determining whether the modified project would result in an increase in the severity of the impacts identified in the prior Station East EIR or would result in any new impacts not previously considered in the prior Station East EIR. The criteria for determining the significance of environmental impacts in this Addendum analysis are the same as those contained within the previous Station East EIR. The topic areas considered in the prior Station East EIR were as follows:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazardous and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning

- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

SECTION 2

Project Background and Proposed Modification

2.1 PROJECT BACKGROUND

The project evaluated in the *Station East Residential/Mixed Use Project Environmental Impact Report* (Station East EIR) consists of demolition of onsite buildings and surface parking lots to develop up to 974 new residential units (i.e., apartments, condominiums, townhome-style condominiums) and approximately 30,800 sf of commercial space. The project site would include 11 planning areas (PAs) with 33 residential buildings and one community building. Most of the 34 proposed buildings would be between three and five stories tall. Vehicular access to the project site would be via Decoto Road on the north side of the project site, 7th Street on the east side of the project site, and Bradford Way and Zwissig Way on the south side of the project site. Three community parks, one tot lot, and one outdoor amphitheater would be located on the project site. Pedestrian, bicycle, and vehicular access would be provided throughout the project site. The proposed project would include approximately 1,791 parking spaces for vehicles (including 190 on-street surface stalls) and 458 parking spaces for bicycles, both long term (i.e., bike storage facilities) and short term (i.e., bicycle racks), and other vehicle, pedestrian, and bicyclist improvements. Construction of the proposed project would begin in mid-2023 and occur in two phases over approximately 4.5 years, with anticipated completion in late 2026.

The project analyzed in the Station East EIR also identified construction activities that include demolition that would generate approximately 2,175 tons of demolished building material and approximately 80,000 cubic yards (cy) of demolished trees, landscaping, soil, concrete, and asphalt. In total, all 26.5 acres of the project site would be disturbed during construction activities identified in the Station East EIR.

Station East Voluntary Cleanup Agreement Area (Station East Site)

The Station East Voluntary Cleanup Agreement Area (Station East site) occupies approximately 18.71 acres located near 7th Street and Decoto Road within a commercial/industrial area of the City of Union City (refer to **Figure 1**). The Station East site operated as agriculture land from 1930s to the present and remains largely undeveloped, although two warehouses were added in the 1980s in the northern portion of the site. Historical agriculture use and a former rail spur were identified as sources for environmental impacts to surface soil at the site. In addition, volatile organic compounds (VOCs) released from the upgradient former McKesson facility has impacted groundwater and soil vapor at the site. Soil, soil vapor, and groundwater investigations at the Station East site go back 30 years. In shallow soil, elevated concentrations of pesticides, related to the area with historical agriculture use, and lead, along the former rail spur, were identified. The VOCs groundwater plume originated from the upgradient former McKesson facility lies below the eastern portion of the Site affecting shallow, intermediate, and deep aquifer zones. VOCs off-gassing from the groundwater plume also affect soil vapor.

2.2 PROPOSED MODIFICATION TO THE PROJECT

The proposed modification to the project evaluated in this Addendum includes the excavation and offsite disposal of impacted soils and installation and operation of a vapor intrusion mitigation system (VIMS) and soil vapor extraction (SVE) system for soil vapor as described in the Remedial Action Plan (RAP). Vapor intrusion involves the movement of chemical vapors from contaminated soil and groundwater into nearby buildings. Vapor intrusion mitigation methods are classified as either

“passive” or “active” and can include sealing openings, vapor barriers, passive venting, sub-slab depressurization, and building over-pressurization. SVE involves removing contaminant vapors from below ground for treatment above ground. SVE involves drilling one or more extraction wells into the contaminated soil and attached to the wells is equipment (such as a blower or vacuum pump) that creates a vacuum. The vacuum pulls air and vapors through the soil and up the well to the ground surface for treatment.

The RAP includes a detailed engineering plan for conducting the remedial action, a description of the on-site contamination, and the goals to be achieved by the removal action. The draft Remedial Action Plan, prepared by Fallon Consulting and dated August 15, 2022, is entitled *Second Revised Draft Removal Action Plan, Station East Voluntary Cleanup Agreement Area, Union City, California*, is incorporated by reference in this Addendum.

The RAP involves a two-fold approach to address soil contaminated with pesticides from former agricultural use and with lead from former rail spurs. Approximately 38,500 cubic yards (cy) of impacted soils will be excavated and disposed offsite during the site development process. The excavation activities will also remove rail lines where present. Additionally, construction and operation of a VIMS for future buildings will serve to mitigate potential human exposure to soil vapor containing volatile organic compounds (VOCs). This Addendum focuses on the potential effects of excavating and hauling the contaminated soil from the Station East site and installation of the VIMS and SVE system.

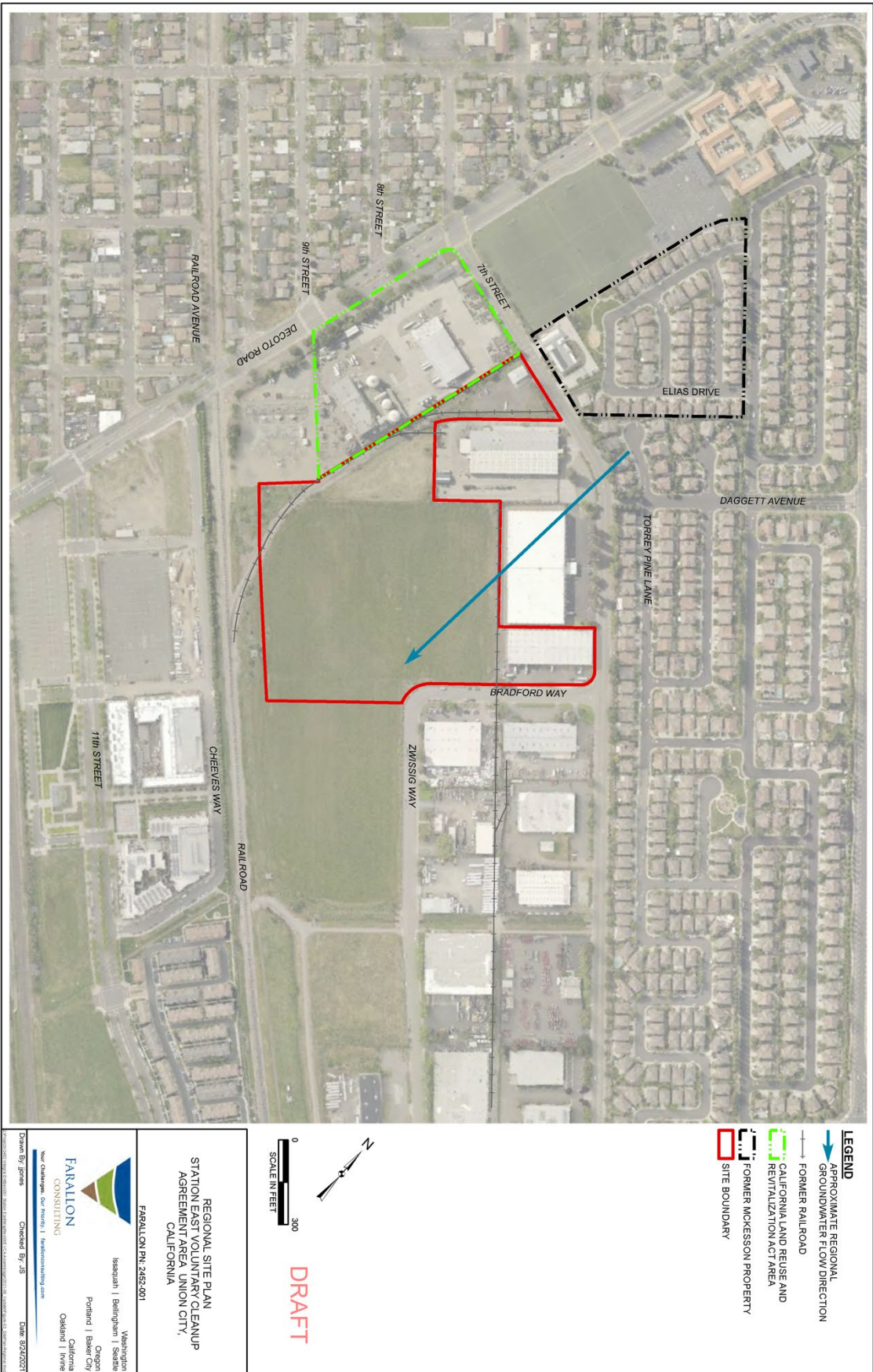
The excavation and offsite disposal activities will consist of removing and transporting impacted soil to an appropriate, permitted off-site facility for disposal. Excavation includes using loaders, backhoes, and/or other appropriate equipment. Excavation activities have the potential to generate dust emissions during the use of earth-moving equipment. Suppressant, water spray, and other forms of dust control will be implemented, as necessary, during excavation, and workers may be required to use personal protective equipment to reduce exposure to compound of concern (COCs). Sloping excavation sidewalls could result in increasing the volume of soil requiring excavation. Confirmation soil sampling and analysis will be conducted to verify that cleanup criteria have been met at the excavation bottom and sidewalls. Excavation may also require soil stockpiling prior to disposal. It is anticipated that soil excavation depths will range from 1 to 2.5 feet below ground surface (bgs). If cleanup goals are not met, step-out and/or step-down excavation could be performed beyond 2.5 feet bgs. The excavations will be backfilled using clean overburden or imported soil.

The cleanup activities for soil vapor will consist of constructing and operating a VIMS for all newly constructed buildings and an SVE system for the entire site. The design for the VIMS will be submitted to DTSC for review and approval. In addition, construction quality assurance, as-builts, and initial performance monitoring documentation for the VIMS will be submitted to DTSC following completion of buildings and prior to occupancy. Ongoing operations, maintenance, and monitoring (OM&M) of the VIMS will be performed in accordance with a DTSC-approved OM&M Plan until soil vapor cleanup goals are met or DTSC issues an alternative plan. Lastly, a land use covenant (LUC) will be recorded for the Site that addresses the presence of a potential vapor intrusion threat and any existing or planned VIMS. The LUC will restrict groundwater extraction for remediation purposes only, restrict construction of new buildings without a VIMS, and restrict site modifications that may impact engineering controls.

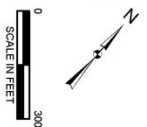
The SVE system will be constructed and operated to address the area most impacted with VOCs in soil vapor, located directly above the McKesson groundwater plume, where concentrations of perchloroethylene (PCE) and trichloroethylene (TCE) exceed 100 times the default soil vapor screening level. The SVE system is anticipated to consist of approximately 14 vertical SVE wells

screened from approximately 8 to 38 feet bgs, conveyance piping, and a centralized vapor-phase granular activated carbon (GAC) treatment system. The SVE system would require an air permit from the Bay Area Air Quality Management District (BAAQMD) and SVE system operation would commence after collection of paired soil vapor/indoor air data from the fully constructed residences.

The overall cleanup activities will occur at the same time as the overall development project and, therefore, the timeframe for completion of cleanup activities would be contingent on the overall project timeframe.



- LEGEND**
- APPROXIMATE REGIONAL GROUNDWATER FLOW DIRECTION
 - FORMER RAILROAD
 - CALIFORNIA LAND REUSE AND REVITALIZATION ACT AREA
 - FORMER MCKESSON PROPERTY
 - SITE BOUNDARY



DRAFT

REGIONAL SITE PLAN
STATION EAST VOLUNTARY CLEANUP
AGREEMENT AREA UNION CITY,
CALIFORNIA

FARALLON PL. 2452-001
FARALLON
 CONSULTING
Walt Chalmers, CEO/Principal | farallonconsulting.com

Washington Research Birmingham Seattle Chicago Portland Baker City Oakland Irvine	California Oakland Irvine
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Drawn By: jgms Checked By: JS Date: 02/26/2017

Figure 1
Station East Site

SECTION 3

Environmental Review

3.1 INTRODUCTION

The proposed modification to the project involves the implementation of a Remedial Action Plan (RAP), removal of impacted soil from the Station East site, and installation and operation of a VIMS and SVE system at the Station East site. Refer to Section 2 for detailed project description.

The prior Station East EIR was certified in April 2021. No substantial changes in circumstances have occurred since the prior Station East EIR was prepared and no new information of substantial importance has become available since the prior EIR was prepared.

The following sections include a summary of each of the environmental impact topics evaluated in the prior Station East EIR, and a determination as to whether the modified project would result in an increase in the severity of the impacts identified in the prior EIR, or any new impacts not previously considered in the prior EIR.

3.2 ENVIRONMENTAL ANALYSIS

3.2.1 AESTHETICS

The prior Station East EIR indicated that the Project would result in less-than-significant visual impacts because the Project is classified as a mixed-use residential project and is located on an infill site within a Transit Priority Area as defined by CEQA. Accordingly, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099, which prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA. The prior EIR did not recommend any mitigation measures for aesthetic impacts.

The cleanup activities (i.e., contaminated soil excavation and haul away, construction and operation of a VIMS and SVE system) will not have the potential to result in any long-term degradation of the Project site's visual character or quality. In addition, the proposed cleanup activities will not have the potential to create any new lighting impacts beyond what was evaluated in the prior EIR or exacerbate the conditions that led to the initial determination. Based on the above, the proposed cleanup activities will not result in any additional significant adverse aesthetic impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse aesthetic impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.2 AGRICULTURAL AND FORESTRY RESOURCES

As indicated in the prior EIR, no impacts related to agricultural resources will occur as there are no existing agricultural or forestry resources on the Project site. The cleanup activities will occur in the same footprint as the original project. Therefore, the cleanup activities will not result in any additional significant adverse impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse agricultural or forestry impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.3 AIR QUALITY

As indicated in the prior EIR, impacts related to air quality were found to be less than significant with implementation of recommended mitigation measures. The cleanup activities (i.e., contaminated soil excavation and haul, construction and operation of a VIMS and SVE system) will use diesel vehicles and equipment for the removal of contaminated soil similar in nature to that analyzed in the prior EIR (e.g., rubber-tired dozer, tractors/loaders/backhoes, excavators, graders, trenchers). In addition, cleanup activities will generate dust. The prior EIR determined project-related air pollutant emissions from demolition and grading would comply with all applicable regulatory standards including Bay Area Air Quality Management District's (BAAQMD) requirement for implementation of best management practices (BMPs) for fugitive dust. Mitigation measure AQ-2d of the prior EIR requires all construction contractors to implement the basic construction mitigation measures recommended by BAAQMD which include:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) will be watered two times a day.
- All haul trucks will be covered when transporting soil, sand, or other loose material offsite.
- All visible mud or dirt track-out material on adjacent public roads will be removed using wet-power vacuum-type street sweepers at least once a day. The use of dry-power sweeping is prohibited.
- All vehicle speeds will be limited to 5 miles per hour on unpaved roads.
- All roadways, driveways, and sidewalks that are to be paved will be paved as soon as possible.
- Building pads will be laid as soon as possible after grading, unless seeding or a soil binder is used.
- All construction equipment will be maintained and properly tuned in accordance with manufacturers' specifications. All equipment will be checked by a certified visible-emissions evaluator.
- Idling times will be minimized, either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure).
- Publicly visible signs will be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person will respond and take corrective action within 48 hours. BAAQMD's phone number will also be visible to ensure compliance with applicable regulations.

The cleanup activities will also be required to reduce fugitive dust in compliance with BAAQMD requirements as identified in the prior EIR. In addition, a project-specific Community Air Monitoring Plan (CAMP) would be prepared in support of remediation or removal activities that could release COCs into the air to ensure that public health and safety are protected, long-term environmental risks would be properly managed, and the appropriate regulations would be followed. The excavation of contaminated soil on the Project site would require additional construction activities in certain areas of the site. The prior EIR analyzed the potential impacts of peak daily construction emissions onsite and determined that the air quality impacts would be potentially significant for emissions of reactive organic gases (ROG) and nitrous oxide (NO_x). Mitigation measure AQ-2b and AQ-2c of the prior EIR requires all off-road diesel-powered equipment used during construction is equipped with EPA-approved Tier 4 Final engines and all diesel trucks to have 2010 model year or newer engines. The cleanup activities will also be required to implement these measures to reduce construction-related ROG and NO_x emissions. Lastly, the SVE system specifically would require obtaining an air permit from the BAAQMD prior to operation. Therefore, the cleanup activities would not result in any

additional significant adverse air quality impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse air quality impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.4 BIOLOGICAL RESOURCES

The prior EIR indicated that the project could result in direct and indirect effects on sensitive wildlife species during project construction. Specifically, determination was made that the project could result in potentially significant impacts related to burrowing owl habitat and nesting migratory birds. As a result, the project has the potential to impact migratory and other bird species if construction activities were to occur during the nesting season. Construction-related disturbances could result in nest abandonment or premature fledging of the young. Therefore, the EIR recommended three mitigation measures (BIO-1a, BIO-1b, and BIO-1c) that require project activities to take place outside of the breeding bird season and retaining a qualified biologist to conduct preconstruction surveys. Implementation of these mitigation measures were determined to reduce impacts to nesting birds to a less-than-significant level by ensuring that any active bird nests on or adjacent to the site are not disturbed by project construction.

As such, the cleanup activities are also made subject to these measures and requirements. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior EIR. With the implementation of adopted measures and compliance with state and federal regulatory requirements, the cleanup activities would not result in any additional significant adverse biological resource impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse biological resource impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.5 CULTURAL RESOURCES

The prior EIR indicated that project construction activities could result in significant impacts to unknown subsurface cultural or paleontological resources. However, implementation of recommended mitigation measures (CUL-2a, CUL-2b, and CUL-3) would reduce potential impacts to subsurface cultural or paleontological resources to a less-than-significant level by providing a process for evaluating and, as necessary, avoiding impacts to identified resources. As such, the cleanup activities are also made subject to these measures and requirements. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior EIR. With implementation of recommended mitigation measures, the cleanup activities would not result in any additional significant adverse cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.6 ENERGY RESOURCES

The prior EIR indicated demolition and construction activities for the project would result in a temporary increase in energy demand. Construction-related energy usage and consumption would vary throughout the course of project buildout, and would depend on the level of activity, length of construction period, specific construction operations, types of equipment, and number of personnel,

which could result in a potentially significant energy impact if best management practices (BMPs) are not implemented. However, implementation of recommended mitigation measure GHG-1a would reduce the amount of fossil fuel consumed during construction activities and not result in the wasteful, inefficient, or unnecessary consumption of energy resources. The cleanup activities involve the use of similar construction equipment that was evaluated in the prior EIR. With implementation of recommended mitigation measures, the cleanup activities would not result in any additional significant adverse energy resource impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse energy resource impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.7 GEOLOGY AND SOILS

The prior EIR indicated that project construction activities would not result in significant impacts to geology and soils, except as related to paleontological resources. The geologic unit exposed at and below ground surface at the project site is known to have yielded scientifically important fossils and this geologic unit is considered to have high paleontological sensitivity. Construction of the project would involve ground-disturbing activities including excavation for utility trenches. Therefore, project construction would disturb a geologic unit with high paleontological sensitivity and accordingly has potential to destroy unique paleontological resources. However, implementation of recommended mitigation measure GEO-7 would require a qualified paleontologist to prepare a Paleontology Monitoring and Mitigation Plan (PMMP) prior to initial ground disturbance on paleontologically sensitive geologic units. Implementation of mitigation measure GEO-7 would minimize impacts on paleontological resources by requiring training to enable construction personnel to recognize potential fossils unearthed during grading and excavation activities and paleontological monitoring to provide an additional mode for recognizing the presence of paleontological resources. The cleanup activities are also made subject to this measure and requirements. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior EIR. With implementation of the adopted measure and regulatory requirements, the cleanup activities would not result in any additional significant adverse geology and soils impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse impacts to geology and soils or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.8 GREENHOUSE GAS EMISSIONS

As indicated in the prior EIR, impacts related to greenhouse gas emissions were found to be potentially significant. Demolition and construction activities for the project would result in the temporary generation of greenhouse gas (GHG) emissions. Emissions would originate from mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. The Bay Area Air Quality Management District (BAAQMD) has not established a quantitative threshold for assessing construction related GHG emissions. Instead, the air district recommends evaluating whether construction activities would conflict with statewide emission reduction goals and implementing feasible best management practices (BMPs). If a project does not implement feasible BMPs, it is anticipated that it would conflict with statewide emission goals and construction related GHG emission impacts would be significant. Therefore, implementation of recommended mitigation measure GHG-1a would avoid any conflict with statewide emission reduction goals by requiring contractors, as a

condition of contracts (e.g., standard specifications), to reduce construction-related GHG emissions by implementing BAAQMD's recommended best management practices.

Similarly, the project would use diesel vehicles and equipment during implementation of the removal action that are comparable to those associated with construction that was evaluated in the prior EIR. With implementation of the mitigation measure and regulatory requirements, the cleanup activities would not result in any additional significant adverse impacts related to GHG emissions or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse impacts related to GHG emissions or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.9 HAZARDS AND HAZARDOUS MATERIALS

As indicated in the prior EIR, implementation of the project could result in potentially significant impacts to hazards and hazardous materials. The project site has a history of contamination and has undergone a series of environmental investigations, as detailed in the draft Remedial Action Plan (RAP). However, the prior EIR identified the need for oversight and management of onsite contamination and includes required actions in recommended mitigation measures HAZ-2a and HAZ-2b.

The RAP activities involve the excavation, transportation, and disposal of soil contaminated with hazardous substances along with construction and operation of a VIMS and SVE system. The RAP proposes a soil removal action to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste substance at the site. All removal, transportation, and disposal will be performed in accordance with applicable federal, state, and local laws, regulations, and ordinances, and Best Management Practices (BMPs). Overall, the RAP implements the oversight and management of onsite contamination as required in the recommended mitigation measures.

In addition, the cleanup activities are also made subject to the above-mentioned mitigation measures and requirements. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior EIR. With the implementation of adopted measures and regulatory requirements, the excavation and haul activities would not result in any additional significant adverse hazardous materials impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse impacts related to hazards and hazardous materials or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.10 HYDROLOGY AND WATER QUALITY

As indicated in the prior EIR, implementation of the project would not result in any potentially significant impacts to hydrology and water quality. The cleanup activities will occur in the same footprint as the original project. The cleanup activities, therefore, would not result in any changes to the conclusion of the prior EIR that potential impacts related to hydrology and water quality would remain less than significant.

Conclusion: *The cleanup activities will not result in any additional significant adverse impacts related to hydrology and water quality or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.11 LAND USE AND PLANNING

The prior EIR concluded that the project would have less than significant impacts with respect to land use and public land use policies. The cleanup activities will occur in the same footprint as the original project and will make no changes to the original project land use. As such, the cleanup activities will not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The potential impacts of the cleanup activities related to land use and public land use policies will remain less than significant.*

3.2.12 MINERAL RESOURCES

As indicated in the prior EIR, the project would not result in significant impact to mineral resources. The cleanup activities will occur in the same footprint as the original project and will, therefore, not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The potential impacts of the cleanup activities related to mineral resources will remain at no impact.*

3.2.13 NOISE

As indicated in the prior EIR, implementation of the project would potentially result in significant levels of noise exposure related to construction noise. A mitigation measure (NOI-1a) was recommended that will reduce this impact to a less-than-significant level. The mitigation measure requires the project applicant, prior to demolition or grading permit issuance, to submit a noise control plan to reduce construction noise levels such that project construction noise will be in compliance with the City's Community Noise Ordinance. The excavation and haul activities will involve noise generating activities that will be substantially the same as project construction activities. Such activities were determined by the prior EIR to be less than significant with the implementation of the recommended mitigation measure. The mitigation measure will apply to the excavation and haul activities and will, therefore, not result in any additional significant adverse noise impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse noise impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.14 POPULATION AND HOUSING

The prior EIR concluded that the project would have less than significant impacts with respect to population and housing. The cleanup activities will not displace housing nor induce growth and, therefore, will not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The potential impacts of the cleanup activities related to population and housing will remain less than significant.*

3.2.15 PUBLIC SERVICES

As stated in the prior EIR, impact to public services was determined to be less than significant. The cleanup activities will not increase the demand for public services as compared to the prior project.

Therefore, the cleanup activities will not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The potential impacts of the cleanup activities related to public services would remain less than significant.*

3.2.16 RECREATION

As indicated in the prior EIR, the project would not result in significant impact to recreation. The cleanup activities will not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The potential impacts of the cleanup activities related to recreation would remain less than significant.*

3.2.17 TRANSPORTATION

The prior EIR indicated that the project would not result in any significant impacts related to construction activities. The excavation and haul activities will increase the number truckloads of soil for off-site disposal. Specifically, it is anticipated approximately 2,139 truck trips total will be required to transport impacted soils for offsite disposal. Excavation of COC-impacted soil is anticipated to take approximately 60 days which result in an average of 36 truck trips per day for disposal of contaminated soils. However, these truck trips are already primarily accounted for in the truck trips generated by the overall redevelopment of the project site. Therefore, the truck trips associated with offsite disposal of contaminated soil are not considered significant in relation to the overall project-related truck trips (10,256 total haul trips during the grading/demolition construction stage) and their potential to conflict with a program, plan, ordinance, or policy addressing the circulation system. The prior EIR concluded that construction activities within the public right-of-way may need partial or full temporary closure of roadways, bikeways, and/or pedestrian facilities. Any needed closures would be temporary and include appropriate traffic control and detours for all users to ensure continued access and circulation. Thus, detours would be temporary and would not fully impede movement or have a sustained detrimental impact on existing transit, bicycle, or pedestrian facilities. The excavation and haul activities would similarly not produce a detrimental impact on existing bicycle and pedestrian facilities and potential conflicts with programs, plans, ordinances, or policies addressing the circulation system would remain at a less-than-significant level. Therefore, the excavation and haul activities will not result in any additional significant adverse traffic impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Senate Bill 743 and Vehicle Miles Traveled

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating Transportation impacts. SB 743 specified that the new criteria should promote the reduction of greenhouse gas emissions, promote the development of multimodal transportation networks, and promote a diversity of land uses. The bill also specified that delay-based LOS could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and

provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. The OPR guidelines allow lead agencies to adopt their own thresholds of significance that are supported by substantial evidence (CEQA Guidelines Section 15064.7(c)).

In its simplest form, VMT is calculated by multiplying the daily trip generation of a project by the average trip length. The planned residences and businesses as part of the project will generate long-term trips that are considered part of VMT. Even though the excavation and haul activities will create traffic trips, these temporary trips will only occur during construction activities. Therefore, the excavation and haul activities will not affect the long-term VMT of the project.

Conclusion: *The excavation and haul activities will not result in any additional significant adverse traffic impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.18 TRIBAL CULTURAL RESOURCES

The prior EIR indicated that project construction activities could not result in significant impacts to subsurface tribal cultural resources. Although no known tribal cultural resources were identified during the City's Native American consultation, the Sacred Lands File (SLF) search, or the Northwest Information Center (NWIC) records search, the project has the potential to encounter previously undocumented prehistoric archaeological resources. Specifically, the potential exists for previously undiscovered tribal cultural resources (as defined in CEQA Section 21074.2) to be encountered during demolition or construction activities associated with the project. Therefore, the prior EIR recommends implementation of mitigation measures CUL-2a, CUL-2b, and CUL-3 to ensure that impacts related to tribal cultural resources are reduced to a less-than-significant level. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior EIR. Therefore, the excavation and haul activities will not result in any additional significant adverse tribal cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior EIR.

Conclusion: *The cleanup activities will not result in any additional significant adverse tribal cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.19 UTILITIES AND SERVICE SYSTEMS

The prior EIR indicated that the project would have no significant utilities and services impacts. The cleanup activities will result in a minor increase in the demand for solid waste disposal at the designated sites listed in the RAP. Contaminated soil disposal will be performed in accordance with applicable federal, state, and local laws, regulations, and ordinances, and Best Management Practices (BMPs). The excavation and haul activities, therefore, will not result in any changes to the conclusion of the prior EIR that potential impacts related to utilities and services will remain less than significant.

Conclusion: *The potential impacts of the cleanup activities related to utilities and services will remain less than significant.*

3.2.20 WILDFIRE

The prior EIR determined that the project would not include any changes to the existing public roadways that provide emergency access to the site or surrounding area. The project site is located in an urban environment and would not have the potential to result in any impacts to wildfire. The cleanup activities will not result in any additional significant adverse impacts or increase in the severity of impacts to wildfire.

Conclusion: *The cleanup activities will not result in any additional significant adverse wildfire impacts or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.2.21 MANDATORY FINDINGS OF SIGNIFICANCE

The prior EIR found that the mandatory finding of significance items related to cumulatively considerable impacts were found to be less than significant with mitigation. As indicated by the prior analysis in Section 3 of this Addendum, the cleanup activities will not result in any additional significant impacts or substantially increase the severity of the impacts identified in the prior EIR. Furthermore, the findings determined that impacts related to adverse effects on human beings and biological resources and cultural resources associated with the project were found to be less than significant with implementation of recommended mitigation measures. The foregoing analysis in each of the subject areas in this Addendum indicates that neither of these impacts will be substantially increased due to the cleanup activities.

Conclusion: *The cleanup activities will not result in any additional significant adverse impacts specified in the Mandatory Findings of Significance or a substantial increase in the severity of the impacts identified in the prior EIR.*

3.3 CONCLUSION

Based on the forgoing analysis, DTSC has determined that the potential environmental impacts associated with cleanup activities have been analyzed and addressed in the previously prepared EIR and this Addendum and would not result in conditions outlined in State CEQA Guidelines Section 15162 that would require preparation of a subsequent Environmental Impact Report.