

REGIONAL TRANSIT ISSUE PAPER

Agenda Item No.	Board Meeting Date	Open/Closed Session	Information/Action Item	Issue Date
9	07/25/11	Open	Action	07/12/11

Subject: Adoption of Addendum for University/65th Street Transit Center Improvement Project

ISSUE

Whether to adopt the Addendum to the Mitigated Negative Declaration for the University/65th Street Transit Center Improvement Project.

RECOMMENDED ACTION

Adopt Resolution No. 11-07-___, Approving the Addendum to the Mitigated Negative Declaration for the University/65th Street Transit Center Improvement Project.

FISCAL IMPACT

None from this action.

DISCUSSION

RT initiated a project in 2007 to relocate its bus transfer facility at the University/65th Street light rail station to facilitate a transit-oriented development at the site. Redevelopment funds have been provided by the Sacramento Housing and Redevelopment Agency (SHRA) to advance this project.

In support of the University/65th Street Transit Center Improvement Project (proposed project), an Initial Study (IS) was undertaken pursuant to the California Environmental Quality Act (CEQA), resulting in a draft decision to prepare a Mitigated Negative Declaration (MND) under the Guidelines of the State Secretary for Resources, (Title 14, California Code of Regulations, Section 15070). The IS/MND was adopted by the Board on December 14, 2009.

Subsequently, SHRA and the City of Sacramento approached RT to add sidewalk extensions along the south side of Folsom Blvd. to the project. The sidewalk extensions would improve access to the light rail station and bus transit center from the surrounding businesses and from CSUS. Staff also desires to apply for a Community Design Grant from the Sacramento Area Council of Governments (SACOG) to improve the University/65th Street light rail station. The Addendum to the MND covers the additional scope of the project, including both the Folsom Blvd. sidewalks and the light rail station improvements. The Addendum found no additional impacts from the additional project scope. The findings of the Addendum do not commit RT to implement the additional scope; implementation depends on RT obtaining adequate funding for the additional scope.

Staff recommends Board approval of the attached resolution certifying the Addendum to the University/65th Street Transit Center Improvement Project.

Approved:

Presented:

Final 7/18/11

General Manager/CEO

Director, Civil and Track Design

C:\Temp\BCL Technologies\NitroPDF6\@BCL@140BC9F9\@BCL@140BC9F9.doc

RESOLUTION NO. 11-07-_____

Adopted by the Board of Directors of the Sacramento Regional Transit District on this date:

July 25, 2011

**APPROVING THE ADDENDUM TO THE MITIGATED NEGATIVE DECLARATION
FOR THE UNIVERSITY/65TH STREET TRANSIT CENTER IMPROVEMENT PROJECT**

WHEREAS, an Initial Study and Final Mitigated Negative Declaration (IS/MND) were prepared by and for the Sacramento Regional Transit District (RT) for the University/65th Street Transit Center Improvement Project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §21000 et seq.); the Guidelines for Implementation of CEQA (14 Cal. Code Regs. §15000 et seq.) (“Guidelines”); and the local procedures adopted by RT pursuant thereto; and

WHEREAS, on December 14, 2009, the RT Board of Directors adopted Resolution No. 09-12-0203, certifying the Initial Study and Mitigated Negative Declaration for the University/65th Street Transfer Center Improvement Project, adopting the Mitigation Monitoring and Reporting Program (MMRP, State Clearinghouse # 2009102059), and approving the Project; and

WHEREAS, this Addendum dated July 2011 (Exhibit A) pertaining to the additional scope for light rail station improvements and for sidewalks along the south side of Folsom Boulevard between 65th and 69th Streets, has been prepared in accordance with Section 15164 of the Guidelines.

BE IT HEREBY RESOLVED BY THE BOARD OF DIRECTORS OF THE SACRAMENTO REGIONAL TRANSIT DISTRICT AS FOLLOWS:

Section 1. Procedures. The Board of Directors of the Sacramento Regional Transit District finds as follows:

A. The revised project description for the proposed University/65th Street Transit Center Improvement Project (hereinafter the “Project”) is set forth in attached Exhibit A, which is incorporated herein by reference.

B. Sacramento Regional Transit District (RT) prepared this Addendum to the University/65th Street Transit Center Improvement Project IS/MND to evaluate the effects of the proposed project changes. Pursuant to the provisions of Section 15164 of the Guidelines, the RT Board finds that the environmental effects of the project changes described in this Addendum to the IS/MND are minor and will not result in increased impacts or greater impacts than those identified in the University/65th Street Transit Center Improvement Project IS/MND, nor will they require the adoption of new mitigation or monitoring measures.

The RT Board finds that the conditions set out in Section 15162 of the Guidelines are not applicable to the project or the changes described in this Addendum (Exhibit A) to the IS/MND because: (a) the changes are not substantial and do not require major revisions to the University/65th Street Transit Center Improvement Project IS/MND; (b) the changes do not create new significant environmental effects or an increase in the severity of the previously identified significant effects; (c) substantial changes have not occurred with respect to the circumstances under which the Project is undertaken and there is no new information of substantial importance which was not known or could have been known at the time the University/65th Street Transit Center Improvement Project IS/MND was certified which shows that the project and project changes could create significant effects not previously discussed, increase the severity of the previously identified effects, or require analysis or adoption of new mitigation measures or alternatives.

Section 2. The RT Board hereby approves this Addendum (Exhibit A) to the University/65th Street Transit Center Improvement Project IS/MND.

Section 3. The Project description provided in the University/65th Street Transit Center Improvement Project IS/MND is hereby amended by incorporating the Project changes described in Addendum to the University/65th Street Transit Center Improvement Project IS/MND. This Addendum is hereby appended to the University/65th Street Transit Center Improvement Project IS/MND as a part of the Administrative Record.

Section 4. The documents and other materials that constitute the record of proceedings upon which the RT Board has based its decision are located in the office of the Planning Manager, 1400 29th Street, Sacramento, California 95816.

DON NOTTOLI, Chair

A T T E S T:

MICHAEL R. WILEY, Secretary

By: _____
Cindy Brooks, Assistant Secretary

**Sacramento Regional Transit District
University/65th Street Station Improvement Project
CEQA Addendum**

Prepared for:

Sacramento Regional Transit District
1400 29th Street
P.O. Box 2110
Sacramento, CA 95812

Prepared by:

Atkins
475 Sansome Street, Suite 2000
San Francisco, CA 94111

July 2011

Sacramento Regional Transit District University/65th Street Station Improvement Project CEQA Addendum

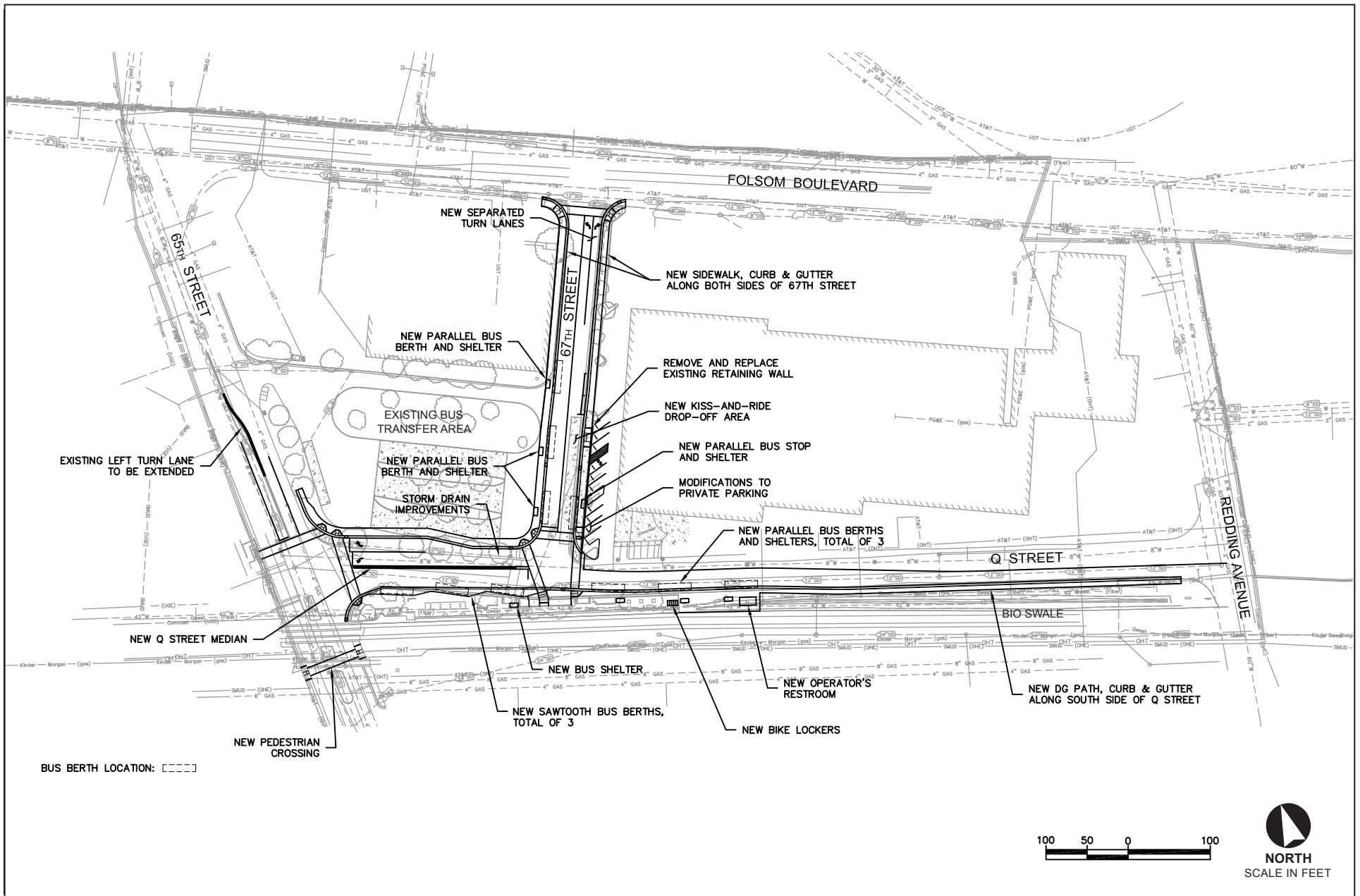
INTRODUCTION AND BACKGROUND

The Sacramento Regional Transit District (RT) manages, maintains, and operates the Sacramento Regional Transit system, which provides light rail transit (LRT) and bus service within Sacramento County, including the cities of Sacramento, Citrus Heights, Elk Grove, Folsom, and Rancho Cordova. RT operates an LRT/bus transfer station at the intersection of 65th and Q Streets. Additional transit service at this location is provided by Amador Regional Transit System (ARTS), California State University-Sacramento (CSU Hornet Shuttle), and Sutter Memorial Hospital.

In 2009, RT recognized an opportunity to improve LRT/bus transfers and simultaneously create a transit-supportive development at its transit center at 65th Street. On December 14, 2009, the RT Board approved the University/65th Street Transit Center Improvement Project (hereafter referred to as the “previously approved project”) and adopted an Initial Study and Mitigated Negative Declaration (IS/MND) in compliance with the California Environmental Quality Act (CEQA).¹ The purpose of project was to improve the convenience, safety and quality of the transit experience and to increase the numbers of potential riders by encouraging high-density development near the transit station. Figure 1, below, shows the basic elements of the previously approved project. The principal components of the project included, but were not limited to, the following:

- Relocation of the existing bus transfer area north of Q Street, between 65th Street and the future 67th Street, to the right-of-way (ROW) along the south side of Q Street (eastbound) and along the future 67th Street (southbound);
- Consolidation of the bus transfer area and the LRT station to free the existing bus transfer area property for future transit-supportive commercial and residential use;
- Relocation of all bus berths as close to the LRT platform as possible, to minimize patron travel time and distance between buses and trains;
- Dedication of an existing private access corridor to become 67th Street;
- Relocation of the existing traffic signal at the intersection of the re-aligned Q Street and 65th Street; and
- Improvement of the existing left turn lane from southbound 65th Street onto Q Street.

¹ California Public Resources Code Section 21000 et seq.



Source: Psomas and Sacramento Regional Transit District, 2009.



FIGURE 1
Previously Approved Project Conceptual Site Plan

100021799

DESCRIPTION OF THE REVISED PROJECT

Subsequent to the adoption of the IS/MND by the RT Board for the previously approved project, additional changes to the project facility were proposed by RT. Because these new modifications (hereafter referred to as the “revised project”) were not discussed in the IS/MND, the proposed modifications require further environmental evaluation in compliance with CEQA. The revised project is evaluated in this Addendum, pursuant to *Title 14, California Code of Regulations (CEQA Guidelines) Section 15164²*.

The modifications and additional features of the revised project include:

Phase 1:

- Extension of the previously approved sidewalks along Folsom Boulevard; and
- Drainage and street lighting improvements along Folsom Boulevard to connect to the previously approved storm drain improvements beneath the roadway.

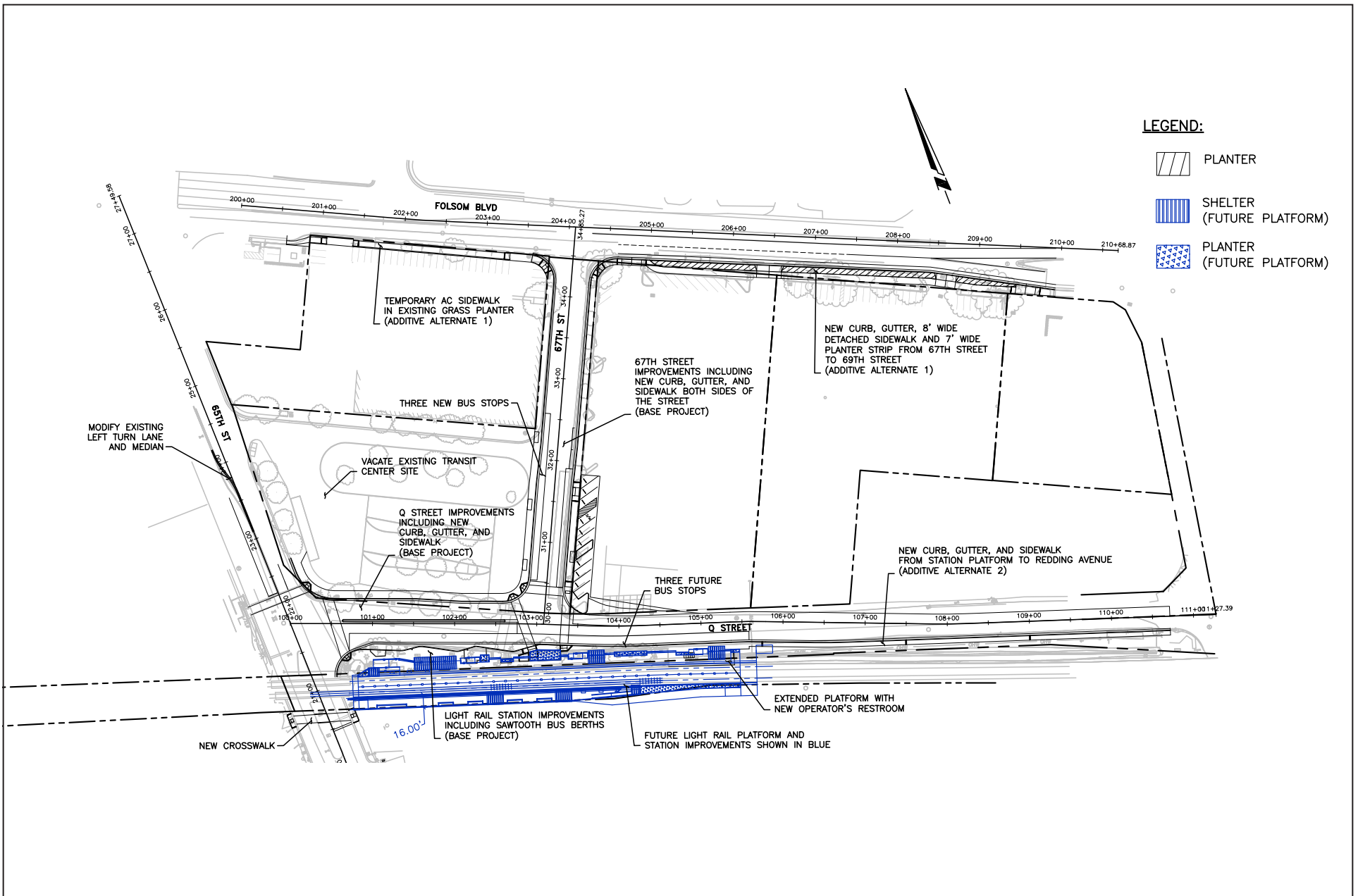
Phase 2:

- Elevation of the main LRT boarding platform by approximately 8 inches;
- Extension of the station platform approximately 15 feet to the south;
- Extension of the station platform approximately 100 feet to the east;
- Construction of a cross-track pedestrian walkway on the east end of the platform;
- Construction of additional passenger shelters and station-platform amenities; and
- Improvement of on-site communications, landscaping, and lighting.

The revised project is not intended to increase the capacity of the transit center, bus service, or LRT operations. Rather, it is intended to more effectively accommodate the relocation of the existing bus transit area to areas on Q Street adjoining the LRT platform. Other components of the revised project would provide for the efficient and safe flow of pedestrian traffic from, to, and within the project area.

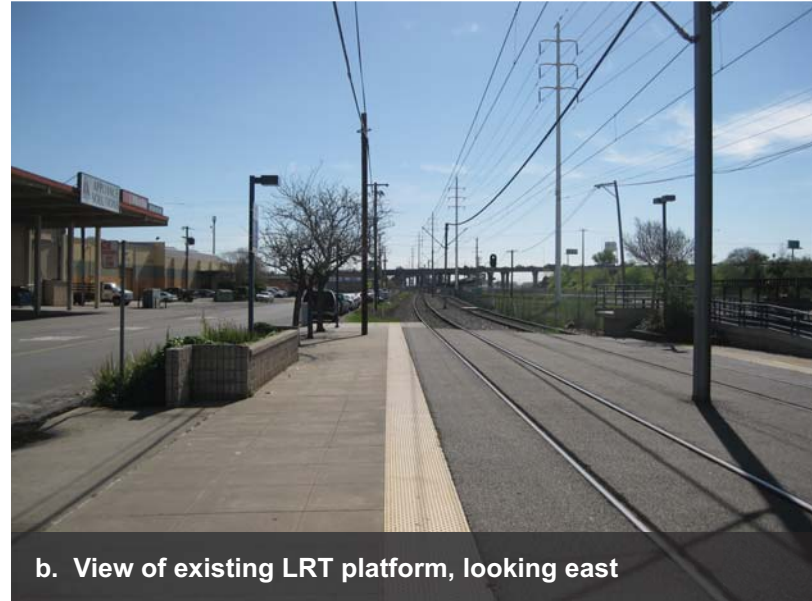
Construction of the revised project improvements would be integrated into the construction schedule for the previously approved project. The revised site plan for the University/65th Street Station Improvement Project is shown in Figure 2.

² Section 15164 of the CEQA Guidelines allows a Lead Agency to prepare an addendum to a previously certified environmental document if some changes or additions are necessary, as long as none of the conditions described in Section 15162 of the CEQA Guidelines requiring the preparation of a subsequent environmental document have occurred. In brief, Section 15162 states that when an environmental document has been certified, no subsequent document needs to be prepared for the project unless the Lead Agency determines, on the basis of substantial evidence in the light of the whole record, that there are substantial changes proposed in the project which require major revisions of the previous document, substantial changes are proposed with respect to the circumstances under which the project is to be undertaken, or there is new information of substantial importance regarding new significant effects, more severe effects, or the feasibility or effectiveness of mitigation measures.





a. View of existing LRT platform, looking west



b. View of existing LRT platform, looking east



c. View of Folsom and 67th Street intersection, looking west



d. View of Folsom and 67th Street intersection, looking east

ANALYSIS OF THE REVISED PROJECT

This Addendum summarizes the conclusions presented in the IS/MND for the previously approved project and analyzes the revised project in light of that information and other information now available. The IS/MND for the previously approved project determined that with mitigation, the project would not result in any significant environmental impacts. Analysis of the revised project for each of the topical issue areas assessed in the IS/MND is presented below.

Aesthetics

Photos of the site are included as Figure 3. There are no identified scenic vistas, resources, or scenic highways in the project vicinity.³ As identified in the previously adopted IS/MND and depicted in Figure 3, the site is currently within an urbanized and built-up area at the northeast corner of 65th Street and Q Street in East Sacramento. Surrounding uses include commercial and warehouse uses to the north and east, the LRT station and tracks to the south, and 65th Street live-work units and retail businesses to the west. The views in the project vicinity are limited because of the flat terrain and the number of service, commercial, and residential buildings that preclude long-range views. The views are largely close-up and typically reflect the urban character of the surroundings. The station environs do not include visual resources, such as significant landforms, rock outcroppings, historic resources, or architecturally or visually distinctive historic buildings.

The existing streetscape is vehicle-oriented, with very limited facilities for pedestrians. The provision of sidewalks in the area is currently limited, and pedestrians currently have to walk on the unpaved shoulder of Folsom Boulevard or through adjacent parking lots to travel to and from the transit center. The revised project would improve this condition by installing sidewalks on the south side of Folsom Boulevard, which would create a streetscape that is more conducive and safe for pedestrian travel and is more visually appealing. The revised project would therefore result in a less than significant impact with regards to aesthetics.

The IS/MND determined that the previously approved project would introduce minimal lighting. Existing nightlight and glare in the project site and vicinity is cast by roadway light fixtures, vehicle headlights, and other outdoor lighting from the surrounding commercial and industrial businesses. Existing light sources in the project area are numerous, so that introduction of any new lighting from the revised project would remain consistent with the ambient lighting levels. The introduction of new lighting from the revised project would not significantly decrease visibility or provide new sources of glare. Accordingly, the revised project would have a less-than-significant light and glare impact.

Temporary construction activities associated with both the previously approved project and the revised project would involve the use of heavy equipment to install sidewalks and platform extensions. Construction activities would be visible from public roadways and surrounding commercial establishments and residences. Due to the absence of any long-range views, and due to the short-term,

³ California Department of Transportation, Officially Designated Scenic Highways, http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, accessed, May 24, 2011.

temporary nature of construction activities, potential visual effects associated with revised project construction would be less than significant.

Agriculture and Forestry Resources

As discussed in the previously adopted IS/MND, the project site is designated as Urban/Built-Up land on the Farmland Mapping and Monitoring Program (FMMP) map for the area.⁴ The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. The project site is zoned General Commercial with a Transit Overlay (C-2 (TO)), which does not permit agricultural-related activities. The project site is not on land that is currently under a Williamson Act contract.⁵ Williamson Act contracts provide relief from property tax to owners of farmland and open-space land in exchange for a 10-year agreement that the land will not be developed or otherwise converted to another use. The motivation for the Williamson Act is to promote voluntary land conservation, particularly farmland conservation. Therefore, the revised project would be consistent with the previously approved IS/MND findings and would have no impact on agricultural resources.

The revised project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. The project site is zoned General Commercial with a Transit Overlay. The project site does not include forest land; therefore the revised project would not result in the loss of forest land or the conversion of forest land into non-forest land. Therefore, the revised project would have no impacts on forest land.

Air Quality

Within the project site, air quality is monitored, evaluated, and regulated by federal, state, regional, and local regulatory agencies and jurisdictions, including the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (CARB), and the Sacramento Metropolitan Air Quality Management District SMAQMD. EPA, CARB, and SMAQMD develop rules and/or regulations to attain the goals or directives imposed by legislation as described in the previously adopted IS/MND. With regard to particulate matter, air quality standards have been adopted for suspended particulate matter less than 10 microns in diameter (PM₁₀) as well as for smaller respirable particles that are 2.5 microns in diameter or less (PM_{2.5}). The Sacramento Valley Air Basin, which includes the project site, is designated as nonattainment for federal and state 8-hour ozone, state 1-hour ozone, state and federal PM₁₀, and the federal and state PM_{2.5} standards.

Construction activities would result in temporary emissions of fugitive dust (measured as PM₁₀). Some PM₁₀ emissions during project construction can be reduced through compliance with SMAQMD Rule 403 requirements for dust abatement and erosion control as discussed in the previously approved IS/MND. The revised project would also result in temporary emissions of Nitrous Oxide (NOX) and Reactive Organic Gases (ROG) from diesel fumes associated with operation of construction equipment during the construction phases. However, construction activities associated with the proposed project would not be

⁴ California Department of Conservation, Farmland Mapping and Monitoring Program, 2006 data, <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/sac06.pdf>, accessed June 2, 2011.

⁵ California Department of Conservation, Williamson Act Program, ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Map%20and%20PDF/Sacramento/sac_wa_2007.pdf, accessed June 3, 2011.

expected to exceed the SMAQMD's annual emission threshold for NOX and ROG. The revised project proposes no additional facilities or activities that would differ substantially from those already assessed in the previously adopted IS/MND. Therefore, the revised project would have a less-than-significant-impact regarding implementation of applicable air quality plans and policies.

The previously adopted IS/MND found that construction emissions would be well below applicable thresholds. Construction activities associated with the revised project include sidewalk installation, platform extensions, and addition of bus waiting shelters and site furniture that would result in negligible increases of temporary emissions of fugitive dust (measured as PM₁₀) and short-term Greenhouse Gas GHG emissions from the combustion of fuel during construction. Emissions of NOX and ROG from diesel fumes associated with operation of construction equipment would also be generated during the construction phase. However, the increase in the intensity of construction activities associated with the revised project would be minimal with regards to the construction activities that would be implemented. The SMAQMD has determined that construction emissions from diesel fumes cause a significant air quality impact only if they would exceed the SMAQMD thresholds for NOX of 85 pounds per day. The additional construction activities associated with the revised project would not substantially increase the amount of equipment used per day beyond that already assessed for the previously approved project. Based on calculations made in the previously adopted IS/MND, the revised project would not be expected to exceed the SMAQMD's thresholds for NOX, and would not result in emissions above established thresholds. As a result, construction air quality impacts associated with the revised project would be less than significant.

The revised project would not result in new operational trip generation since the minor reconfigurations to the existing bus transfer facility would not increase bus service or trips to the site. As a result, emissions associated with additional trips or idling vehicles would not be associated with the revised project. Further, as discussed in the previously adopted IS/MND, when projects are 5 acres or less in size, they are not sufficiently large to generate significant air quality emissions from traffic and do not require mitigation. The revised project would affect less than 5 acres; therefore, according to the screening guidelines, it would not result in a significant operational air quality impact.

While the project site is in a commercial-warehouse area, businesses, residents, and other receptors close to the project site may experience occasional odors from diesel equipment exhaust during construction. This effect would be intermittent and contingent on prevailing wind conditions. The generation of diesel exhaust is not generally considered to be a prime source of odor. Also, the generation of diesel odors would be short-term and periodic. Therefore, this impact is considered to be less than significant.

Biological Resources

As described in the previously adopted IS/MND, the project site is disturbed by vehicle and foot traffic associated with the commercial retail and transit operations. Portions of the project site are occupied by scattered trees and various ornamental, non-native plant species. The majority of the site is paved or covered with concrete sidewalks and platforms. No wetlands are present on the site, nor does the site provide suitable habitat for any special-status species known from the region based on a reconnaissance-level biological survey conducted by a project biologist for the previously approved IS/MND.

Trees and shrubs on the project site could provide potentially suitable nesting habitat for nesting birds. As discussed in the previously adopted IS/MND, mitigation measures have been developed to reduce impacts to nesting birds to a less-than-significant level. The revised project would not create additional impacts to potential nesting habitat, and the previously adopted mitigation measures would be equally effective in reducing impacts to nesting birds. Impacts would be mitigated to a less-than-significant level with implementation of Mitigation Measures BIO-1(a) through BIO-1(c) of the previously adopted IS/MND, which required specific protections for nesting sites during construction.

There are no approved Habitat Conservation Plans, Natural Conservation Community Plans, or other adopted biological resource management plans in the vicinity of the project site. Therefore, the revised project would have no effect on such plans.

The City of Sacramento has adopted an ordinance to protect qualifying trees as a significant resource to the community. As discussed in the previously adopted IS/MND, protected trees could be removed or affected as a result of the project during staging and other construction-related activities. However, implementation of IS/MND Mitigation Measure BIO-2 would require RT to comply with the City of Sacramento's tree ordinance. Compliance with this measure would reduce potentially significant impacts to a less-than-significant level. If protected trees would be removed during construction of the revised project, RT would be required to comply with the City of Sacramento's tree ordinance as prescribed in the previously adopted IS/MND. Therefore, the impact of the revised project would also be less than significant.

Cultural Resources

As discussed in the previously adopted IS/MND, a North Central Information Center (NCIC) records search indicated that no historic-age buildings, structures, districts, or features have been recorded within the project site or within a 200-foot radius. A qualified architectural historian visited the project site on June 10, 2009 to determine if any potential historical resources were present and could be affected by the proposed project, either directly by project construction or indirectly through adverse effects to the resource's setting. No potential historical resources were observed during the site survey. The project site and surrounding area is characterized by modern (post-1960) commercial and warehouse buildings. Construction and operation of the previously approved project would have no impact on recorded or previously unrecorded historical resources. Similarly, the revised project would occur within the same area that was assessed for the previously approved project. Therefore, the finding of no impact to historical resources would also apply to the revised project.

The NCIC records search also determined that there are no prehistoric archaeological sites that have been recorded within or immediately adjacent to the project site. However, it is possible that project-related ground-disturbing activities could encounter previously unidentified, subsurface archaeological or Native American resources. Implementation of Mitigation Measure CR-1 identified in the previously approved IS/MND ensures that any discovered resources would be examined by a qualified archaeologist and appropriate action taken that would reduce potential impacts to less-than-significant levels. This mitigation would also apply to the revised project. Therefore, the revised project would have a less-than-significant archaeological resource impact.

Geology and Soils

As noted in the previously adopted IS/MND, there are no Alquist-Priolo Earthquake Fault Zones within the City of Sacramento.⁶ Consequently, the revised project is not expected to expose people or structures to adverse effects caused by the rupture of a known fault.

Although no known fault lines lie in Sacramento, fault lines do exist approximately 25 miles outside the City. Depending on the strength of groundshaking, it is possible that structures in the area could be damaged during such an event. Bus shelters as part of the revised project improvements would be constructed to California Building Code standards and would not be intended for habitation. Consequently, the revised project is not expected to expose people or structures to strong groundshaking and the hazard in this regard would be less than significant. The project site is located in a flat area; there is no risk of landslides in such terrain. Therefore, the revised project would not expose people or structures to landslides and there would be no impact associated with landslide risk.

The project site is a fully developed site that is paved with minimal landscaping. As required by the previously adopted IS/MND, erosion control during construction would be subject to the City's Grading and Erosion and Sediment Control Ordinance and to Best Management Practices and preventative measures as outlined in the Stormwater Pollution Prevention Plan prepared by the project contractor. With implementation of these standard measures for erosion control as specified in the previously adopted IS/MND, the impact from the revised project would be less than significant.

The IS/MND found that soils on the project site do not possess characteristics associated with expansive soils. Therefore, the impact from construction on expansive soils would be less than significant. This situation has not changed, so that the impact from the revised project would also be less than significant.

Greenhouse Gas Emissions

As noted in the previously adopted IS/MND, the project is expected to result in short-term GHG emissions from the combustion of fuel during construction. The IS/MND found that these emissions would be less than significant. Furthermore, the project enhances access to and interconnection between mass transit services, which is intended to reduce regional vehicle trips associated with passenger cars along roadways and freeways in the Sacramento region. These vehicle trips are a substantial component of GHG emissions, and any activity that reduces these emissions can be considered a benefit with respect to reductions in GHG emissions and attainment of adopted regional GHG reduction goals. The revised project would neither add to the project's GHG emissions nor detract from the GHG reduction benefits associated with mass transit. Therefore, the revised project, like the previously approved project, would have a less-than-significant impact with respect to GHG emissions.

Hazards and Hazardous Materials

The previously approved project would require partial acquisition of the property at 6700 Folsom Boulevard to accommodate an improved turning radius at the southeast corner of Folsom Boulevard and

⁶ California Department of Conservation, California Geological Survey, Alquist-Priolo Earthquake Fault Zones, <http://www.consrv.ca.gov/cgs/rghm/ap/Pages/index.aspx>, accessed May 27, 2011.

67th Street. The 6700 Folsom Boulevard property is included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (State Water Resources Control Board List of Leaking Underground Storage Tank Sites).⁷ In 1987, three underground storage tanks (USTs) were removed from the southwest corner of the property and gasoline-contaminated soil was excavated from the former UST area.

In 2002, the Sacramento County Environmental Management Department (SCEMD) placed the 6700 Folsom Boulevard location into its Local Oversight Program (LOP), and assumed oversight of additional investigation. Groundwater depths in the area range from approximately 36 to 39 feet below the ground surface and generally flow southeast. A groundwater monitoring network consisting of three wells (MW1, MW2, and MW3) was installed in 2002, and groundwater samples have been collected and analyzed quarterly to evaluate the lateral and vertical extent of petroleum-impacted groundwater. In 2008, a fourth monitoring well (MW4) was installed, and at that time soil samples collected from the well boring showed low levels of total petroleum hydrocarbons gasoline (TPHg), ethylbenzene, and total xylenes.⁸ Groundwater in the wells are tested for TPHg, fuel oxygenates (MTBE and others), benzene, toluene, ethylbenzene, and total xylenes, collectively referred to as BTEX. Reported results from 2004 through 2008 show TPHg and BTEX are consistently detected in groundwater in MW1, MW3, and MW4. No contamination has been detected at MW2. Levels of contaminants in MW1 and MW3 in the southwest portion of the property are much lower than those detected in MW4, further southeast. The investigation consultants suggested there appear to be two separate releases of petroleum products contributing to groundwater contamination conditions. Contaminants detected in MW1 and MW3 are probably the result of the former USTs in the southwest corner, while those to the southeast may be associated with an off-site source.⁹ As described in the previously adopted IS/MND, improvement of the existing sidewalk, curb and gutter at the southwest corner of the 6700 Folsom Boulevard property could potentially interfere with MW2. Although no soil or groundwater contamination has been reported at that location, MW2 is part of an established groundwater monitoring network and if damaged would result in a significant impact. The IS/MND includes mitigation measures to ensure that during construction of the previously approved project the existing groundwater monitoring network is identified and avoided, and that appropriate precautions are taken to identify and manage contaminants discovered during construction.

Implementation of the revised project would extend the sidewalk on the northwest corner of the 6700 Folsom Boulevard property along Folsom Boulevard to the east. The revised project would also construct a sidewalk along Folsom Boulevard to the west, between 67th Street and 65th Street. As described above, there are no groundwater monitoring wells in the northwest portion of the 6700 Folsom Boulevard property. Therefore, ground-disturbing activities associated with the proposed sidewalk extensions would not affect the existing groundwater monitoring network. Further, as described in the previously adopted IS/MND, excavation activities associated with sidewalk installation would not extend more than two to

⁷ California Environmental Protection Agency, "Cortese List" Data Resources, <http://www.calepa.ca.gov/SiteCleanup/CorteseList>, <https://geotracker.waterboards.ca.gov>

⁸ Wallace Kuhl Associates, *Subsurface Investigation Report of Findings, 6700 Folsom Boulevard, Sacramento, California*, August 5, 2008.

⁹ Wallace Kuhl Associates, *Subsurface Investigation Report of Findings, 6700 Folsom Boulevard, Sacramento, California*, August 5, 2008.

three feet below ground surface (with the exception of storm drainage and light pole foundations, which would not extend more than five feet below ground surface). The sidewalk improvements included in the revised project would occur along Folsom Boulevard, northwest and northeast of the 6700 Folsom Boulevard property. As stated above, groundwater within the project site ranges from approximately 36 to 39 feet below grade and generally flows southeast. As such, it is unlikely that construction of sidewalks along Folsom Boulevard would expose workers or the public to contaminated groundwater. The revised project would result in ground-disturbing construction activities associated with extension of the existing LRT platform. However, improvements to the LRT platform would be located within the area previously evaluated for listed hazardous materials sites. The only known property containing hazardous materials within and/or surrounding the project site is at 6700 Folsom Boulevard, which is approximately 410 feet from the revised project area (near MW3 and MW4) and approximately 100 feet from the southwest corner of the larger transit facility property (near MW1 and MW2). Although groundwater in the project site generally flows southeast, the groundwater level is relatively deep (approximately 36 to 39 feet below grade) and excavation activities associated with construction of the LRT platform improvements would be limited to a shallow depth (approximately five feet at the deepest point). Therefore, it is unlikely that ground-disturbance associated with the proposed LRT platform extension would expose workers or the public to contaminated groundwater. In the event that unidentified contaminants are encountered during construction, mitigation included in the IS/MND would stop all construction activities immediately and would not resume until mandated remediation measures have been implemented to reduce potential hazards to human health and the environment. Therefore, impacts associated with both known and unknown soil and groundwater contamination on the project site would be less than significant.

Day-to-day operations of the revised project would not require the routine transport, use, or disposal of hazardous materials beyond the use of common hazardous materials found in household cleaning products. Construction activities would require routine use and transport of a limited number of hazardous materials, such as fuel and oil associated with construction equipment. However, these hazardous materials would only be present periodically and for a limited time during the construction phase of the revised project.

As described in the previously adopted IS/MND, prior to construction, a Hazardous Materials Management Plan would be prepared to ensure that potential impacts resulting from accidental spills would be contained and minimized. Hazardous wastes resulting from construction operations would be contained, recycled, and disposed of properly, in compliance with federal, state, and local regulations. Therefore, the use of construction-related hazardous materials would be a less-than-significant impact.

Further, as described in the previously adopted IS/MND, there are no schools located within one-quarter mile of the project site, the project site is not in the vicinity of a public or private airport or an airport land use plan, and the revised project does not include design features that would impede the provision of emergency access to or from the area. As such, implementation of the revised project would have a less-than-significant impact on hazards and hazardous materials.

Hydrology and Water Quality

As with the previously approved project, the revised project would be required to comply with all wastewater discharge requirements (WDR) identified in the previously adopted IS/MND including: the Municipal Separate Storm Sewer (MS4) Stormwater National Pollutant Discharge Elimination System (NPDES) permit (Order No. R5-2008-0142, NPDES No. CAS082597 [Municipal Stormwater NPDES Permit] and the Statewide Construction General NPDES permit for stormwater runoff (Order No. 2009-0009-DWQ, NPDES No. CAS000002 [Construction General NPDES Permit]), and potentially, the dewatering and low threat discharges general NPDES permit (Order No. R5-2008-0081 and NPDES No. CAG995001 [Dewatering General NPDES Permit]). In addition, the City of Sacramento has implemented a Stormwater Quality Improvement Program and developed a Stormwater Quality Improvement Plan (SQIP) in compliance with these WDRs. Compliance with these WDRs is considered protective of water quality by the State and Regional Water Quality Control Boards. Consequently, violation of WDRs or water quality standards would not be expected and water quality effects would be less than significant.

Groundwater within the project vicinity ranges from about 36 to 39 feet below ground surface. Excavation activities associated with the revised project would be limited to shallow depths and are not anticipated to interfere with groundwater resources. Further, because the revised project would result in a negligible increase in impervious cover, groundwater recharge would not be adversely affected. As identified in the previously adopted IS/MND, if construction dewatering is necessary it would be regulated under the Dewatering General Permit.

Implementation of the revised project would result in a total net increase of impervious surface cover of approximately 14,421 square feet (sf). The increase in impervious cover would be associated with the extension of the LRT platform and construction of sidewalks along Folsom Boulevard. The revised project would also widen the existing LRT platform by 15 feet and extend it 100 feet to the east. However, the additional sidewalks would include a curb and gutter to direct any increase in surface runoff to the City's stormwater drainage system. Therefore, the revised project would not substantially affect on-site or off-site erosion.

The project area is currently served by an existing 12-inch underground storm drain pipeline that runs beneath Folsom Boulevard. This 12-inch pipeline conveys storm flows westerly to the mainline storm drain, which is located beneath 65th Street. The 12-inch pipeline beneath Folsom Street has a modeled capacity of 2.5 cubic feet per second (cfs). Hydraulic analysis shows that the existing storm drain does not have the capacity to convey the entire 10-year storm event, which under existing conditions is predicted at 2.81 cfs. With the project, the needed capacity is predicted at 2.92 cfs, an increase of 0.11 cfs over existing conditions. Therefore, the project would impose a marginal increase to the currently deficient condition. However, the increase of 0.11 cfs represents only a marginal increase to storm flows, and would not significantly increase flow depths along Folsom Boulevard during a storm event. As such, the impact from the project would be less than significant.

As described in the IS/MND, the previously approved project would construct a bio-swale from the easternmost bus berth along Q Street to 69th Street/Redding Avenue. This swale would serve to filter stormwater runoff before the runoff enters the municipal storm drain system and would be designed in

accordance with Mitigation Measure HY-1 in the IS/MND. In addition, the proposed bio-swale would filter surface runoff due to the extended LRT platform, thereby reducing the potential for siltation and water quality degradation. Furthermore, development and implementation of a Storm Water Pollution Prevention Plan, in accordance with the Construction General NPDES Permit and the City's Stormwater Management and Discharge Control Ordinance, and compliance with the City's Grading, Erosion and Sediment Control Ordinance would ensure that potential on-site construction erosion and contribution of pollutants to stormwater runoff would not be substantial.

The revised project would remain within the same project site as analyzed in the previously adopted IS/MND. As such, the revised project would not be within a FEMA-designated 100-year floodplain.¹⁰ Further, the American River is confined in levees throughout most of the City of Sacramento and is located less than one mile up-gradient of the project site. The current FEMA maps have not certified the existing levees on the American River, and have therefore identified the areas along the American River as subject to flooding without these levees. The project site is located in an area that is protected by levees. The project site is located within the inundation zone from failure of the Folsom Dam and may be in the inundation zone from failure of the Nimbus Dam.¹¹ Both the Folsom and Nimbus Dams are under federal jurisdiction and administered by the U.S. Bureau of Reclamation (USBR). The USBR ensures the safety of dams through annual inspections for safety deficiencies, analyses that use current technologies and designs, and corrective actions, if needed, based on current engineering practices. Public Law 95-578 and Public Law 98-404, along with Federal Guidelines for Dam Safety and the Department manual, guide USBR's dam safety efforts. In 1996, an independent review team comprised of representatives from the Association of Dam Safety Officials was assembled to assess the Department of the Interior's Dam Safety Program. The report found that the USBR has "an effective Dam Safety Program" overseen by "highly competent" staff using "state-of-the-art technical standards and expertise."¹² USBR's ability to respond to dam safety issues and to take preventative, corrective actions to reduce the public risks under the authority of the USBR Safety of Dams Act was a critical component of this favorable peer review. Outside experts annually review USBR's dam safety activities to ensure that the program has adequate policies and procedures in place to address public safety issues. Therefore, the potential risk associated with dam failure from both the Nimbus and Folsom Dams are remote and flood impacts associated with levee or dam failure are less than significant.

Land Use and Planning

Existing land uses in the project vicinity are commercial, light industrial, and mixed-use residential uses. As with the previously approved project, the revised project improvements including sidewalks, a loading platform extension, drainage improvements, communications, landscaping or lighting improvements would not introduce a new physical or visual barrier that would divide a neighborhood or business community with established physical and visual connectivity and social/business interactions. The

¹⁰ Federal Emergency Management Agency, National Flood Insurance Program, Flood Insurance Rate Map (FIRM), Sacramento County, California, Panel 195 of 310, December 8, 2008.

¹¹ County of Sacramento, County of Sacramento General Plan, Safety Element, Figure III-4.

¹² Keys, John W. III, Commissioner, Bureau of Reclamation, Department of the Interior, Senate Report 108-296 – Reclamation Safety of Dams Act of 1978, July 7, 2004, <http://www.gpo.gov/fdsys/pkg/CRPT-108srpt296/pdf/CRPT-108srpt296.pdf>, accessed June 3, 2011.

features of the revised project are all at grade and would not inhibit movement, circulation, or interaction. The revised project continues to allow for the existing bus transfer area to be developed with transit-oriented uses, thereby facilitating the redevelopment of the area to support the proposed improvements and the existing bus and LRT service. Therefore, the revised project would have no impact in terms of physically dividing an established community.

The City of Sacramento's 2030 General Plan designates the project site, including the current bus transfer area, and adjacent areas as Urban Center Low and as Transform-Urban, which identifies areas expected to experience dramatic change through major development and redevelopment. The area is zoned General Commercial with a Transit Overlay. In addition, the project site is located within the City's East Sacramento Community Plan Area, which identifies the project vicinity as an area available for development as a mixed-use corridor. The revised project would be on the same site and vicinity as the previously approved project and would not require any zoning changes. Conflicts with any land use plan or zoning would not occur. Further, the layout of the additional sidewalks is in conformance with the 65th Street Station Area Study adopted by the City of Sacramento on October 26, 2010 (M09-019).

As stated in the previously adopted IS/MND, the project site and vicinity are not included in either a habitat conservation plan or natural community conservation plan. Because the revised project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, there would be no land use impact.

Mineral Resources

The previously adopted IS/MND found that the project vicinity is in mineral resource zone 3 (MRZ-3) which is defined as an area containing mineral deposits, the significance of which cannot be evaluated from available data.¹³ The project site is in an urbanized area and mineral resource extraction would not be compatible with existing land uses on and around the site. This situation has not changed. Therefore, the revised project would not result in adverse impacts to mineral resources.

Noise and Vibration

The project site is in an urban environment with a relatively high ambient noise level because of its close proximity to Highway 50, existing traffic on 65th Street and Folsom Boulevard, and light rail operations. The previously adopted IS/MND noted that the average noise within the project vicinity ranges from 66.7 to 69.9 L_{eq}.¹⁴ The IS/MND found that operation of the previously approved project would have no impact on long-term noise levels in the project area. The revised project would not introduce any additional noise sources beyond those already assessed for the previously approved project. As such, the operational noise from the revised project would have a similar less-than-significant impact.

Implementation of the revised project would result in intermittent, short-term construction-related noise impacts. Construction-related activities would include grading, paving, and construction associated with the elevated and extended LRT station platform and new sidewalks along Folsom Boulevard. Equipment

¹³ City of Sacramento, *General Plan Update Technical Background Report*, June 2005, Figure 6.4-1

¹⁴ City of Sacramento, Station 65 Project Draft EIR, October 2008, Table 4.4-3, Existing Background Noise Measurement Data, p. 4.4-5.

associated with the revised project would be similar to that identified in the IS/MND. As such, anticipated construction noise levels identified in the IS/MND would also apply to the revised project. The live/work lofts discussed in the IS/MND would be the closest sensitive receptors to the project site. Construction noise impacts associated with the modification of 65th Street would be approximately 50 feet from the closest residential receptor. In the previously adopted IS/MND, the peak noise level generated by these construction activities was determined to be 86 decibels (dB). Improvements to the LRT station platform under the revised project would involve the use of similar construction equipment as required by the previously approved project and would occur east of 65th Street approximately 100 feet from the identified residential uses west of 65th Street. However, the City of Sacramento's Noise Ordinance (Sacramento City Code Section 8.68.080) exempts construction activities from noise abatement requirements so long construction activities are restricted to the hours of 7:00 am and 6:00 pm Monday through Thursday, and 9:00 am and 6:00 pm on Sundays. Compliance with these restrictions would result in a less than significant impact with respect to construction noise. In addition, noise levels associated with construction of the LRT platform extension under the revised project would be equal to or less than 86 dB, as identified in the previously adopted IS/MND. The Federal Transit Administration (FTA) has adopted guidelines for construction noise adjacent to residential land uses. The FTA-recommended threshold is 90 dB during daytime hours. Therefore, the 86 dB predicted under the revised project would not expose additional sensitive receptors to excessive noise levels and would not exceed FTA's construction-generated noise criteria. Based on each of these considerations, no additional impacts with respect to construction noise would result from implementation of the revised project.

Groundborne vibration would occur during project construction as a result of demolition and construction. Activities that typically cause the most substantial ground vibration, such as pile driving or blasting, are not proposed for the revised project. Of the construction equipment likely to be used on site, grading equipment and loaded trucks are the most likely to produce vibration in areas close to the adjacent uses. As mentioned above, the revised project would not require the use of construction equipment not already assessed in the IS/MND. Analysis conducted in the previously adopted IS/MND found that the previously approved project would not result in significant vibration impacts because vibration levels would be below the FTA-established 80 VdB¹⁵ threshold at distances of 50 feet or more. Therefore, based on analysis of the previously approved project, the revised project would have a less-than-significant vibration impact.

Population and Housing

As stated in the project description, the revised project is not intended to increase the capacity of the transit center, bus service, or LRT operations. Rather, it is intended to accommodate the relocation of the existing bus transit area to areas on Q Street adjoining the LRT platform. Other components of the revised project would provide for the efficient and safe flow of pedestrian traffic from, to, and within the project area. The revised project does not include the construction of any residential units, and thus would not directly induce population growth.

Additional ROW may be required along the south side of Folsom Boulevard for the new sidewalks. Portions of properties to be acquired would be at 6620 Folsom Boulevard (APN 015-0010-003), 6700

¹⁵ Vibration intensity is measured in VdB

Folsom Boulevard (APN 015-0010-023), 6750 Folsom Boulevard (APN 015-0010-024), 6760 Folsom Boulevard (APN 015-0010-025), and 6800 Folsom Boulevard (APN 015-0010-015). Property owners have been notified and would be compensated (in the form of in-kind sidewalk and frontage improvements) for the partial acquisition of their property in accordance with applicable federal and state laws. These property acquisitions would not result in impacts to the displacement of existing housing, as the portions of each property being acquired are located along the outer edges of existing parking lots. No residential or business displacements would be required to implement the revised project.

No ROW acquisition is needed for the light rail station improvements, because the widening of the platforms and other improvements would occur within existing RT ROW and ROW owned by the Sacramento-Placerville Transportation Corridor Joint Powers Authority and controlled by RT. The revised project components would not remove any existing housing units and therefore would not displace existing housing units or people necessitating the construction of housing replacement elsewhere. As a result, the revised project would have no impact on land acquisitions that would result in the displacement of residents or businesses.

Public Services

The project site is served by the Sacramento Fire Department for fire protection and emergency medical services. Station 8, at 5990 H Street approximately 1.5 miles north of the project site, is the closest fire station and would provide first response emergency services. The revised project would not include residential units, would not require any additional permanent RT staff, and would not create additional demand for fire protection services. As was the case with the previously approved project, there would likewise be no physical impacts associated with the provision of new or physically altered facilities or require the need for the construction new facilities which could cause significant environmental impacts under the revised project.

The project site is served by the Sacramento Police Department for police protection services. South Command, at 5303 Franklin Boulevard, is the closest police station and would provide police services. Because the revised project would not include residential units and would not require any additional permanent RT staff, there would be no additional demand for police protection services. As stated in the project description, the revised project is intended to accommodate the relocation of the existing bus transit area to areas on Q Street adjoining the LRT platform. Other components of the revised project would provide for the efficient and safe flow of pedestrian traffic from, to, and within the project area. For these reasons, there would be no physical impacts associated with the provision of new or physically altered facilities or any need for the construction of new facilities that could cause significant environmental impacts under the revised project. As described above under Population and Housing, the revised project, like the previously approved project, would not directly increase the number of residents in the City, since it does not include residential units. Because the demand for schools, park services, and other public facilities is driven by population, the revised project would not increase demand for those services. As a result, the revised project would result in no impacts to these services.

Recreation

The IS/MND determined that the previously approved project would have no impact on existing recreation facilities and would not require construction of new recreation facilities. Similarly, the revised project would not increase the number of residents in the City of Sacramento, and would not generate additional demand for recreation facilities. As such, the revised project would have no impact on recreation.

Transportation/Traffic

As described in the previously adopted IS/MND, implementation of the previously approved project would directly affect bus circulation patterns because of the relocation of the existing transfer station and roadway improvements surrounding the project site. These changes would result in a re-distribution of bus traffic on Q Street and 67th Street surrounding the LRT station. However, the traffic improvements described in the IS/MND would make it possible to accommodate the increase in bus traffic on Q and 67th streets. Improvements associated with the revised project are limited to extension and elevation of the LRT platform, implementation of LRT station amenities, and extension of sidewalks along Folsom Boulevard. These improvements would not result in modifications to the road network within the project site that could adversely affect traffic circulation. Therefore, operation of the revised project would not cause a substantial increase in existing traffic loads or result in changes to current levels of service, making potential impacts on existing traffic load and capacity of street systems less than significant.

In addition, the previously approved IS/MND found that the previously approved project would result in short-term construction-related traffic impacts from movement of construction equipment and construction workers' vehicles within the project vicinity. The IS/MND determined that although construction activities associated with the improvements would be temporary, construction-related traffic impacts due to lane closures, detours, and temporary disturbance to roadways would be significant. To reduce these impacts to a less-than-significant level, the IS/MND identified mitigation measures that would require the project contractor to develop and implement a traffic control plan, along with measures to reduce potential damage to roadways.

Implementation of the revised project would be subject to all traffic mitigation measures identified in the previously adopted IS/MND, and would not introduce additional impacts to the existing roadway network described above. Extension of the east-bound and west-bound LRT station platforms would require ground-disturbing construction activities that could impact operations at the station platform, such as LRT passenger loading and unloading. However, compliance with RT standard contractor requirements for work involving active transit stations would ensure that all station platform functions are maintained during construction. According to RT's standard construction specifications, the contractor must provide access for passengers at all times between and among the light rail and bus boarding areas, the fare vending machine, signage, and various site amenities on the platform. All work with the potential to disrupt passenger circulation must be described in a Pedestrian Traffic Control Plan prepared by the contractor and submitted to RT for approval. These requirements would also apply to the revised project. Therefore, the revised project's impact on LRT platform operations and rider circulation would also be less than significant, with mitigation and implementation of standard RT procedures.

The revised project would construct new sidewalks on both the west and east sides of 67th Street, the south side of Q Street from the light rail station to 69th Street/Redding Avenue, and sidewalks and a bike lane along the south side of Folsom Boulevard roughly between 65th Street and 69th Street. Currently, there are no existing sidewalks in the location of the proposed sidewalk construction; and therefore, construction activities required for implementation of the new sidewalks would not adversely impact pedestrian circulation in the project area.

Utilities and Service Systems

As described in the project description above, the proposed improvements associated with the revised project would not increase the capacity of the LRT station, generate additional bus trips, or increase the level of LRT service at the existing station. Revisions to the previously approved project would be limited to modification of the existing station platform and the pedestrian circulation network in the surrounding area. The existing operator's restroom would be demolished and replaced with a relocated restroom of similar design and capacity. Similar to the previously approved project, the revised project would not include dwellings, businesses, or other structures that would further increase the demand for water or wastewater treatment services. Operation of the revised project would not result in additional water demand or wastewater discharge above the level analyzed in the previously adopted IS/MND. Operational solid waste within the project site is primarily generated as a result of the day-to-day use of the transit center, bus service, or LRT operations. Because the level of transit service and pedestrian circulation evaluated in the previously adopted IS/MND would not change as a result of the revised project, operational solid waste generation would remain unaffected. Construction activities associated with the proposed revisions to the previously approved project would generate additional construction-related solid waste. However, as described in the previously adopted IS/MND, during construction activities, all debris would be disposed of at a permitted landfill according to the Sacramento County Department of Waste Management & Recycling's guidelines. The revised project would also be required to divert (recycle) 50 percent of solid waste generated by construction and operation to comply with the 50 percent solid waste diversion rate mandated by the California Integrated Waste Management Act of 1989 (AB 939). This would help to lessen the revised project's impact on landfill capacity and the expansion of existing or construction of new solid waste facilities would not be necessary.

The previously approved project would require minor relocations of several existing utilities, including an AT&T telephone vault at the southeast corner of Folsom Boulevard and 67th Street, a MCI/Verizon overhead cable line, a PG&E gas meter at the southeast corner of Folsom Boulevard and 67th Street, a Qwest fiber optic vault east of the light rail station on the south side of Q Street, and an abandoned SMUD vault at the southeast corner of Q Street and 65th Street that would be removed. However, implementation of the improvements included in the revised project would not affect additional utilities. Therefore, the revised project would have no impact with respect to the relocation of utilities.

Conclusion

Based on the analysis in the above assessment, RT finds that the impacts of the revised University/65th Street Transit Center Improvement Project are consistent with the analysis and findings contained in the previously adopted IS/MND for the project. The proposed project meets the criteria established in

Sections 15162 and 15164 of the CEQA Guidelines for an addendum to a Mitigated Negative Declaration. Based on substantial evidence in the light of the whole record, it is determined that:

- 1) No substantial changes are proposed which would require major revisions of the IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 2) No substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 3) There is no new information of substantial importance, which was not shown or could not have been known with the exercise of reasonable diligence at the time the MND was adopted that shows that:
 - a. The project will have one or more significant effects not discussed in the IS/MND.
 - b. Mitigation measures or alternatives previously found not to be feasible in the IS/MND would in fact be feasible, and would substantially reduce one or more significant effects of the project; and
 - c. Mitigation measures or alternatives which are considerably different from those analyzed in the IS/MND would substantially reduce one or more significant effects on the environment.

Based on the discussion provided above, no subsequent changes are proposed or would occur that would necessitate the preparation of a subsequent IS/MND or other applicable CEQA documentation. Per CEQA Guidelines Section 15164(c), this addendum to the previously adopted IS/MND for the University/65th Street Transit Center Improvement Project need not be circulated for public review. Rather, the RT Board may consider this addendum in light of its findings and the substantial evidence contained in the addendum and the previously adopted IS/MND.