

REGIONAL TRANSIT ISSUE PAPER

Agenda Item No.	Board Meeting Date	Open/Closed Session	Information/Action Item	Issue Date
8	07/28/14	Open	Action	06/26/14

Subject: Approving CEQA Addendum No. 3 and NEPA Re-evaluation of the Final Initial Study/Mitigated Negative Declaration for the Sacramento Regional Transit District Bus Maintenance Facility at McClellan Park

ISSUE

Whether or not to approve California Environmental Quality Act (CEQA) Addendum No. 3 and National Environmental Policy Act (NEPA) Re-evaluation of the Final Initial Study/Mitigated Negative Declaration for the Sacramento Regional Transit District Bus Maintenance Facility (BMF#2), McClellan Park.

RECOMMENDED ACTION

Adopt Resolution No. 14-07 _____. Approving CEQA Addendum No. 3 and NEPA Re-evaluation of the Final Initial Study/Mitigated Negative Declaration for the Sacramento Regional Transit District Bus Maintenance Facility at McClellan Park.

FISCAL IMPACT

None as a result of this action.

DISCUSSION

On September 17, 2004, the Federal Transit Administration (FTA) approved a Categorical Exclusion (CE) under NEPA for the Bus Maintenance Facility at McClellan Park (the Project) located at 3701 Dudley Blvd., Sacramento, CA, pursuant to 23 C.F.R Section 771.117(d)(8).

On February 28, 2005, the Sacramento Regional Transit District (RT) Board of Directors adopted Resolution No. 05-02-0039, certifying the Final Initial Study/Mitigated Negative Declaration (FIS/MND) for the Project pursuant to CEQA.

On June 27, 2005, the RT Board of Directors adopted Resolution No. 05-06-0118, approving Addendum No. 1 to the FIS/MND for the Project to address comments from the State Department of Toxic Substances Control in accordance with Section 15164 of the CEQA Guidelines (Title 14, California Code of Regulations).

On January 25, 2010, the RT Board of Directors adopted Resolution No. 10-01-0007 approving a CEQA Addendum No. 2 to the FIS/MND and NEPA Re-evaluation for the Project adding a bus washer, a 4 inch steel natural gas line, two access driveways from the east and west, demolition of buildings 660 and 683, and installation of concrete blocks on the perimeter. The Board determined that the 2004 NEPA CE remained valid for the Project.

Approved:

Presented:

Final 07/16/14

General Manager/CEO

Chief of Facilities and Business Support Services

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On February 5, 2010, FTA found that the CE dated September 17, 2004 remains valid under 23 C.F.R Section 771.117(d)(8), in considering the January 25, 2010 NEPA Re-evaluation.

RT staff determines that several minor changes to the Project are necessary and desirable to achieve RT's objectives for the Project. In addition, because more than three years have passed since approval of the CE by the FTA, the FTA requires another NEPA re-evaluation of the CE. Consequently, RT staff undertook an analysis to determine if the proposed changes to the Project necessitate preparation of a subsequent Environmental Impact Report (EIR) or negative declaration or affect the viability of the CE.

The proposed CEQA Addendum No. 3 and NEPA Re-evaluation summarizes the conclusions presented in the BMF#2 CE and FIS/MND, and analyzes the Revised Project (defined as the BMF #2 project approved in 2004 and 2005, the modifications included in the 2010 CEQA Addendum No. 2, and the currently-proposed change listed below) in light of information, including the proposed changes to the project and other information now available. The proposed CEQA Addendum No. 3 concludes that the Revised Project is within the scope of previous environmental analyses, will not result in any new significant environmental effects, will not trigger any mitigation measures not already being carried out as part of the Project, and does not require additional environmental review. This CEQA Addendum No. 3 and NEPA Re-evaluation has been submitted to the FTA for approval pursuant to 23 CFR 771.117(d).

The modifications and additional features of the Revised Project include the following:

- The acquisition and use of a 1.503-acre parcel (Parcel 1) at the northeast corner of the project site, a portion of which (0.705 acres) will be used to provide improved internal circulation between the Compressed Natural Gas (CNG) fueling operations and the bus washer, as well as additional parking.

Parcel 1 was not included in the original project site for the bus maintenance facility at McClellan Park because it was not owned by RT and the acquisition of the parcel was uncertain.

Parcel 1 consists of two areas: 1) an approximately 0.705-acre 'usable' area south of an existing fence that is currently covered with an asphalt parking lot, as well as some unpaved and unimproved areas to the east of the parking lot; and 2) an area north of the fence that extends to the centerline of Dean Street, including railroad tracks and a drainage ditch. The area north of the fence is considered the 'unusable' portion of the parcel: it contains a drainage ditch, right-of-way and easements for the roadway and railroad tracks.

The elevation of the parcel is approximately three feet above the new bus maintenance facility to the south. For the usable area south of the fence, RT will remove the existing parking lot, excavate the parcel down approximately three feet to make it level with the remainder of the bus maintenance facility, and repave the entire parcel, including the area that is currently unimproved. A nested piezometer (single borehole containing wells PZ-155 through 158) is located in the

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northwestern corner of the usable portion. The piezometer would be protected in place and adjusted to grade during planned excavation, grading, and pavement work.

The usable portion of the parcel will be used only for parking and bus circulation. No structures will be built. No improvements will occur north of the fence in the unusable portion of Parcel 1. The bus circulation and parking improvements will not require any physical modifications between the fence and the Dean Street centerline, and Dean Street will not be used for bus circulation or parking access.

The documents and other materials that constitute the record of proceedings upon which the Board of Directors will base its decision on the Revised Project are located in the Engineering and Construction Division Office, 2811 O Street, Sacramento, California 95816. The custodian of these documents and other materials is the Regional Environmental Services Manager.

RESOLUTION NO. 14-07-_____

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

July 28, 2014

APPROVING CEQA ADDENDUM NO. 3 TO AND NEPA RE-EVALUATION OF THE FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE SACRAMENTO REGIONAL TRANSIT DISTRICT BUS MAINTENANCE FACILITY AT MCCLELLAN PARK.

WHEREAS, on September 17, 2004, the Federal Transit Administration (FTA) approved a Categorical Exemption (CE) for the Bus Maintenance Facility at McClellan Park, 3701 Dudley Blvd., Sacramento, CA (the Project) under the National Environmental Policy Act (NEPA); and

WHEREAS, on February 28, 2005, the Sacramento Regional Transit District (RT) Board of Directors adopted Resolution No. 05-02-0039, certifying the Final Initial Study/Mitigated Negative Declaration (FIS/MND) for the Project pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and its implementing regulations (Title 14, California Code of Regulations, Section 15000 et seq.) (CEQA Guidelines), and the procedures adopted by RT pursuant thereto; and

WHEREAS, on June 27, 2005, the RT Board of Directors adopted Resolution No. 05-06-0118, approving Addendum No. 1 to the FIS/MND for the Project to address comments from the State Department of Toxic Substances Control in accordance with Section 15164 of the CEQA Guidelines; and

WHEREAS, on January 25, 2010, the RT Board of Directors adopted Resolution No. 10-01-0007 approving a CEQA Addendum No. 2. and NEPA Re-Evaluation to the FIS/MND for the Revised Project adding a bus washer, a 4 inch steel natural gas line, two access driveways from the east and west, demolition of buildings 660 and 683 and installation of concrete blocks on the perimeter, and determined that the 2004 NEPA CE remained valid for the Project as revised; and

WHEREAS, on February 5, 2010, the FTA found that the CE dated September 17, 2004 remains valid pursuant to 23 C.F.R Section 771.117(d)(8), in considering the NEPA Re-evaluation; and

WHEREAS, RT now determines that several minor changes to the Project are necessary and desirable to achieve RT's objectives for the Project, including: The acquisition and use of a 1.503-acre parcel (Parcel 1) at the northeast corner of the project site, a portion of which (0.705 acres) will be used to provide improved internal circulation between the Compressed Natural Gas (CNG) fueling operations and the bus washer, as well as additional parking ("Revised Project"); and

WHEREAS, because more than three years have passed since the FTA approved the CE in 2004 and 2010, the FTA requires a NEPA Re-evaluation of the CE before it will grant further approval for the Project. Consequently, RT undertook an analysis to

determine if the proposed changes to the Revised Project affect the viability of the CE; and

WHEREAS, pursuant to CEQA, RT undertook an analysis to determine if the proposed changes to the Revised Project necessitate preparation of a subsequent EIR or negative declaration.

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

THAT, pursuant to Section 15164(c) of the CEQA Guidelines, RT prepared Sacramento Regional Transit District Bus Maintenance Facility at McClellan Park Parcel 1 Addition CEQA Addendum No. 3 and NEPA Re-Evaluation ("CEQA Addendum No. 3 and NEPA Re-Evaluation") (Exhibit A), dated February 2014, to analyze whether proposed changes to the Project, located at 3701 Dudley Blvd., Sacramento, CA, necessitate preparation of a subsequent EIR or negative declaration or affect the viability of the CE; and

THAT, the RT Board of Directors finds that the changes to the Project are minor and that none of the conditions described in Section 15162 or 15164 of the CEQA Guidelines calling for preparation of a subsequent EIR or negative declaration have occurred because the proposed changes (as further discussed in Exhibit A): (a) are not substantial and do not require major revisions to the Project's FIS/MND; (b) do not create new significant environmental effects or an increase in the severity of the previously identified significant effects; and (c) do not create substantial changes with respect to the circumstances under which the Revised Project is undertaken. In addition, there is no new information of substantial importance which was not known or could have been known at the time the Project's FIS/MND was certified that shows the proposed 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; and

THAT, the RT Board has considered the information contained in the CEQA Addendum No. 3 and NEPA Re-Evaluation; and

THAT, the CEQA Addendum No. 3 and NEPA Re-Evaluation for the Revised Project reflects the independent judgment of the RT Board; and

THAT, in accordance with Section 15164 of the CEQA guidelines, the RT Board of Directors hereby approves CEQA Addendum No.3 and NEPA Re-Evaluation to the Revised Project FIS/MND, which is attached hereto and incorporated herein as Exhibit A; and

THAT, the CEQA Addendum No. 3 and NEPA Re-Evaluation (Exhibit A) is intended to serve as the written NEPA Re-evaluation required by 23 C.F.R. Section 771.129; and

THAT, the RT Board of Directors finds, after re-evaluation of the Revised Project, including the changes set forth above, that the Revised Project still meets the criteria set forth in 23 C.F.R. Section 771.117(d)(8) for a Categorical Exclusion, subject to approval by the FTA. This revised Project has been submitted to the FTA for approval of the CE determination.

THAT, the documents and other materials that constitute the record of proceedings

upon which the Board of Directors has based its decision are located in the Engineering and Construction Division Office, 2811 O Street, Sacramento, California 95816. The custodian of these documents and other materials is the Regional Environmental Services Manager.

PHILLIP R. SERNA, Chair

A T T E S T:

MICHAEL R. WILEY, Secretary

By: _____
Cindy Brooks, Assistant Secretary

**SACRAMENTO REGIONAL TRANSIT DISTRICT
BUS MAINTENANCE FACILITY AT MCCLELLAN PARK
PARCEL 1 ADDITION
CEQA ADDENDUM No. 3 AND NEPA RE-EVALUATION**

Prepared for:

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RT

June 2014

Sacramento Regional Transit District Bus Maintenance Facility at McClellan Park, Parcel 1 CEQA Addendum No. 3 and NEPA Re-evaluation

Introduction

This CEQA Addendum No. 3 and NEPA Re-evaluation addresses the acquisition and use and operation of the 1.503-acre Parcel 1 property located northeast of the current 14.05-acre Sacramento Regional Transit District (RT) bus facility at McClellan Park.

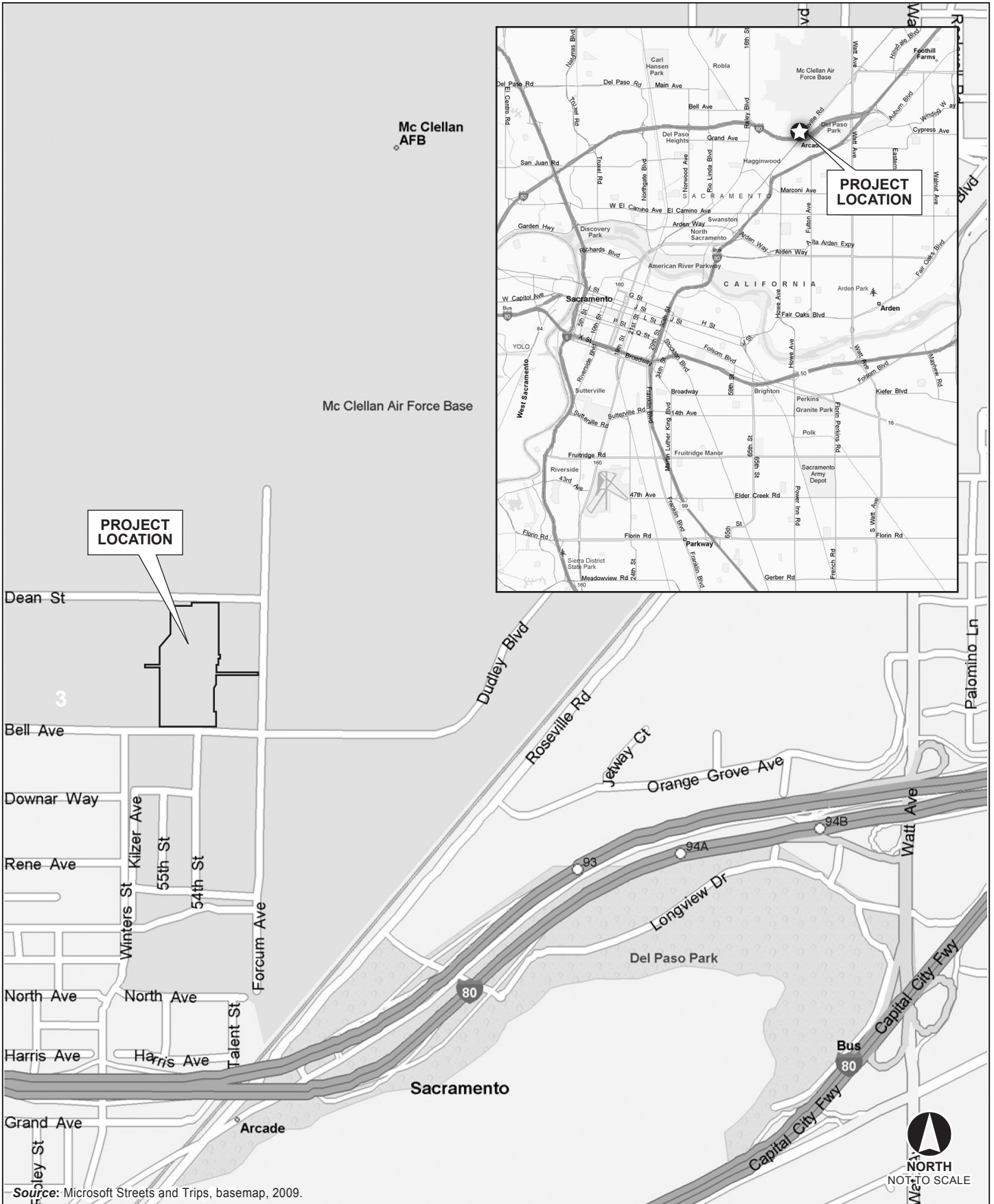
Background

Sacramento RT operates a bus network of 248 buses that are powered by compressed natural gas (CNG) and service a 418-mile service area that has reached the effective capacity of its sole bus maintenance facility in Midtown Sacramento. In order to meet the projected 150 percent increase in transit service needs of urban Sacramento and the recommendations of regional plans for transportation and air quality, RT requires a new bus maintenance and operations facility. The purpose of the Bus Maintenance Facility #2 (BMF#2) project is to provide sufficient maintenance facilities to accommodate the planned growth of RT's bus service and to locate the new maintenance and operations facility at an optimal site from an environmental, cost, and operations point of view. The new maintenance facility would need to provide space for fueling and maintenance for up to 250 compressed natural gas (CNG) buses and allow modest expansion of the existing facility's capacity.

From 2002 to 2004, RT engaged a team of professional maintenance facility design consultants to assist in reviewing the existing facility and to design and site a new facility. The approach taken in the resulting studies was to maximize the efficiency of the RT bus system by strategically locating a new maintenance facility. The project included preliminary site planning, space needs forecasts and analyses, and screening of 28 alternative sites.

On December 9, 2002, the RT Board approved an Initial Study and Mitigated Negative Declaration (IS/MND) in compliance with the California Environmental Quality Act (CEQA) for the then-preferred 31.7-acre site at Main Avenue near the intersection of Raley Boulevard (Main Avenue site). In addition, the Federal Transit Administration (FTA) approved a Categorical Exclusion (CE) for the Main Avenue site on July 2, 2003 in compliance with the National Environmental Policy Act (NEPA). RT was subsequently presented with an opportunity at a site in McClellan Park (the former McClellan Air Force Base [AFB]) for its new Bus Maintenance Facility (BMF) #2, which offers even more desirable amenities in terms of location, cost, and the ability to reuse existing buildings.

RT initiated an evaluation to document the environmental impacts, if any, of the BMF#2 project at 3701 Dudley Boulevard in the southwest corner of the former McClellan AFB (see Figure 1). BMF#2 also involves modifications to the existing Midtown Maintenance Facility to allow it to operate more efficiently and to modestly increase its capacity. The facilities will provide repair and service for CNG



Source: Microsoft Streets and Trips, basemap, 2009.

FIGURE 1
Project Location Map

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Sacramento Regional Transit Bus Maintenance Facility #2 Project



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buses, as RT has phased out its entire diesel bus fleet to meet the more stringent air quality requirements of the Sacramento region.

The BMF#2 project involves modifications at the existing Midtown facility as well as at the new facility at McClellan Park; however, the Midtown improvements have already been addressed in the prior environmental document and approved by RT and the FTA in 2002.

FTA approved a CE on September 17, 2004 (2004 CE), and the RT Board approved an IS/MND on February 28, 2005 for the BMF#2 at McClellan Park (2005 IS/MND). Shortly after the approval of the IS/MND, RT received a letter from the California Department of Toxic Substances Control (DTSC) in March 2005, which provided minor corrections to the document in regards to hazardous materials conditions at the former McClellan AFB. The comments were responded to by RT, and CEQA Addendum No. 1 was prepared to update the IS/MND. The amendments to the 2005 IS/MND did not result in changes to the impacts or mitigation measures. Thus, no subsequent EIR or IS/MND was required. The RT Board approved CEQA Addendum No. 1 on June 27, 2005, in accordance with Section 15164(d) of the CEQA Guidelines.

Additional changes to the facility evaluated in the 2004 and 2005 environmental documents were proposed by RT in 2009-2010. A CEQA Addendum #2 and NEPA Re-evaluation was prepared and issued in 2010 to address the proposed new elements, including the addition of a bus washer, demolition of Building 660, addition of two emergency access driveways, installation of concrete blocks, installation of compressed natural gas (CNG) fueling facilities, construction of a service building, and a gas pipeline connection from Roseville Road to the proposed CNG equipment yard. The amendments to the 2005 IS/MND did not result in changes to the impacts or mitigation measures, and no subsequent EIR or IS/MND was required. The RT Board approved Addendum #2 on January 25, 2010, in accordance with Section 15164(d) of the CEQA Guidelines and a NEPA re-evaluation. On February 5, 2010, the FTA approved the NEPA re-evaluation in a letter to RT and found that the CE dated September 17, 2004 remains valid.

Description of Changes

At this time, RT is proposing additional changes to the facility. Because these new modifications were not discussed in the 2005 IS/MND and 2004 CE, the proposed modifications require further environmental evaluation in compliance with NEPA and CEQA.

The Revised Project (defined as the BMF#2 project approved in 2004 and 2005, the modifications included in the 2010 Addendum #2, and the currently-proposed change listed below) has been evaluated in this Addendum #3 and Re-evaluation, pursuant to the 23 *Code of Federal Regulations (C.F.R.) Section 771.129 (Re-evaluations)*, and pursuant to the *Title 14, California Code of Regulations (CEQA Guidelines) Section 15164*. As a result of this re-evaluation, RT has concluded that no new significant impacts or substantial increases in the severity of previously identified significant effects would result from the Revised Project as proposed.

This CEQA Addendum #3 and NEPA Re-evaluation summarizes the conclusions presented in the BMF#2 2004 CE and 2005 IS/MND, analyzes the proposal in light of that information and other information now available, and concludes that the Revised Project is within the scope of previous environmental analyses, would not result in any new significant environmental effects, would not trigger any mitigation measures not already being carried out as part of the BMF#2 project, and does not require additional environmental review. The modifications and additional features include the following:

- The acquisition and use of a 1.503-acre parcel (Parcel 1) at the northeast corner of the project site, a portion of which (0.705 acres) would be used to provide improved internal circulation between the CNG fueling operations and the bus washer, as well as additional parking.

Parcel 1 was not included in the original project site for the bus maintenance facility at McClellan Park because it was not owned by RT and the acquisition of the parcel was uncertain. Figure 2 shows the previously approved project site boundary and the proposed Parcel 1 addition relative to the previously approved project.

Parcel 1 consists of two areas: 1) an approximately 0.705-acre ‘usable’ area south of an existing fence and is currently covered with an asphalt parking lot, as well as some unpaved and unimproved areas to the east of the parking lot; and 2) an area north of the fence that extends to the centerline of Dean Street, including railroad tracks and a drainage ditch. The area north of the fence is considered the ‘unusable’ portion of the parcel: it contains a drainage ditch and right-of-way and easements for the roadway and railroad tracks. The Parcel 1 boundary and usable and unusable areas are illustrated in Figure 3.

The elevation of the parcel is approximately three feet above the new bus maintenance facility to the south. For the usable area south of the fence, RT would remove the existing parking lot, excavate the parcel down approximately three feet to make it level with the remainder of the bus maintenance facility, and repave the entire parcel, including the area that is currently unimproved. A nested piezometer (single borehole containing wells PZ-155 through 158) is located in the northwestern corner of the usable portion.¹ The piezometer would be protected in place and adjusted to grade during planned excavation, grading, and pavement work.

The usable portion of the parcel would be used only for parking and bus circulation. The internal bus circulation pattern for the Revised Project is shown in Figure 4. No structures would be built. No improvements would occur north of the fence in the unusable portion of Parcel 1. The bus circulation and parking improvements (Figures 2 and 4) would not require any physical modifications between the fence and the Dean Street centerline, and Dean Street would not be used for bus circulation or parking access.

¹ GEOCON Consultants, Inc., “Bus Maintenance Facility – Parcel 1 McClellan Park, Sacramento, California, Preliminary Summary Report – Environmental Review,” letter report to Dawn Fairbrother, Sacramento Regional Transit District, June 4, 2010.

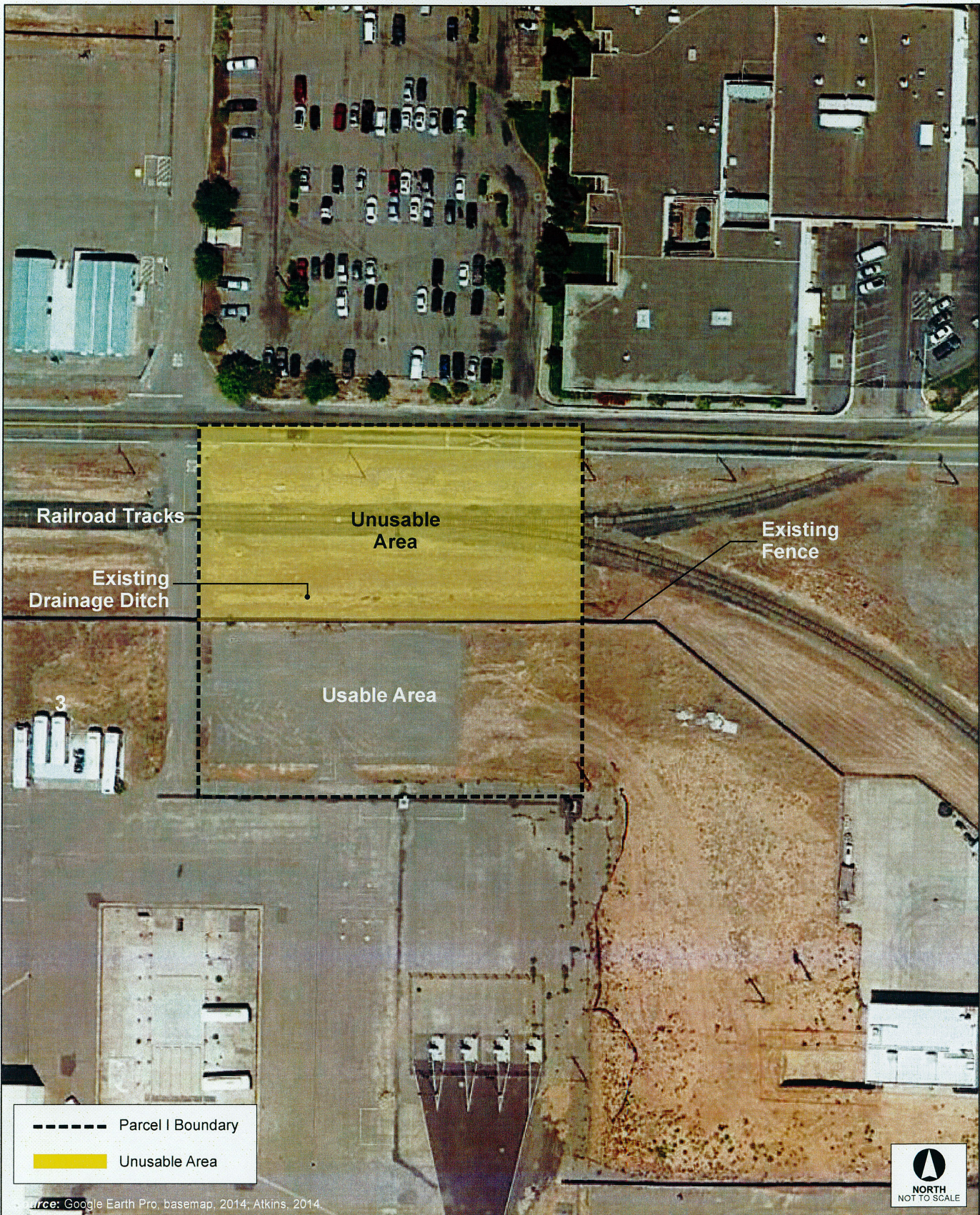


Figure 2
Parcel I Addition

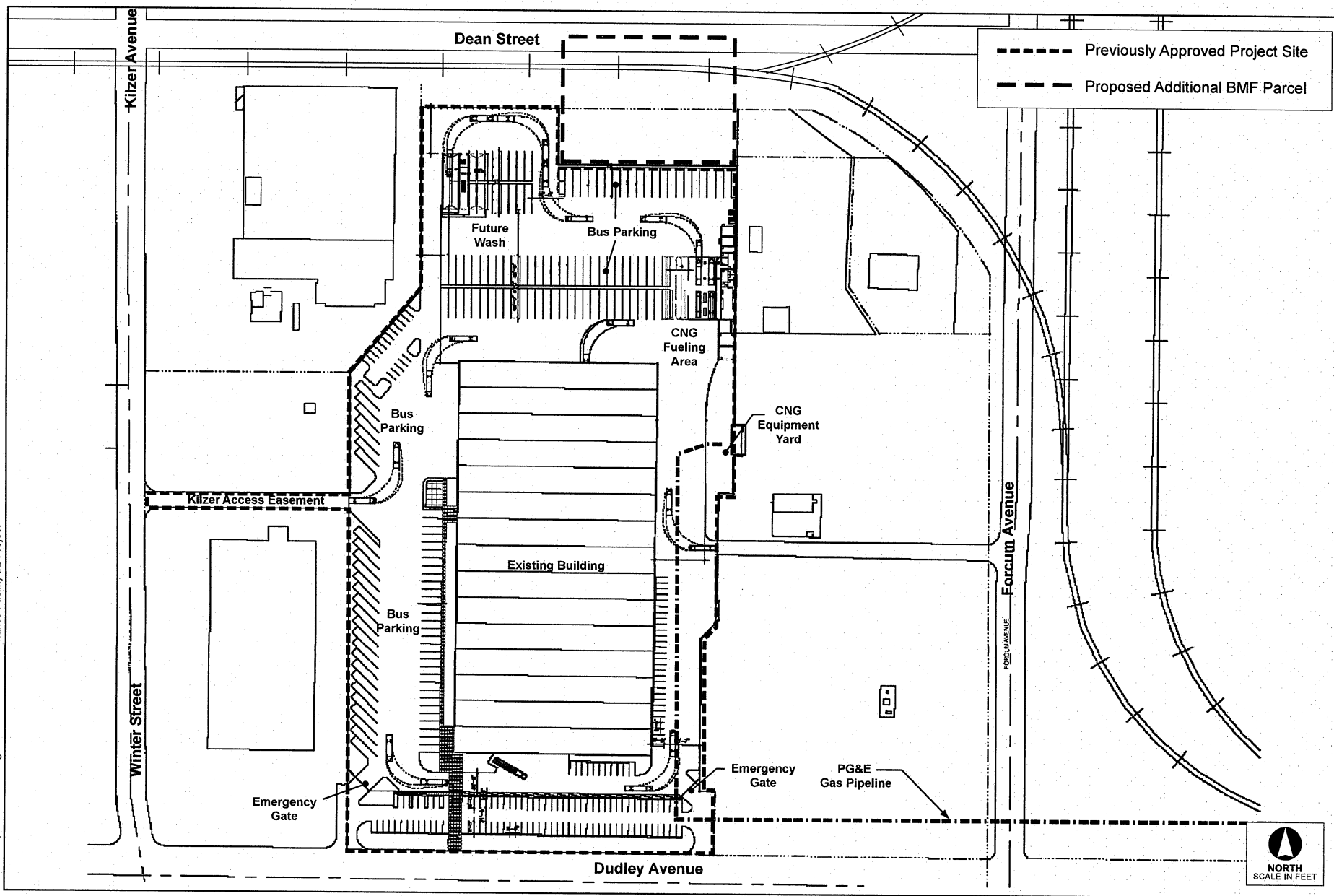


Figure 3
Bus Maintenance Facility #2

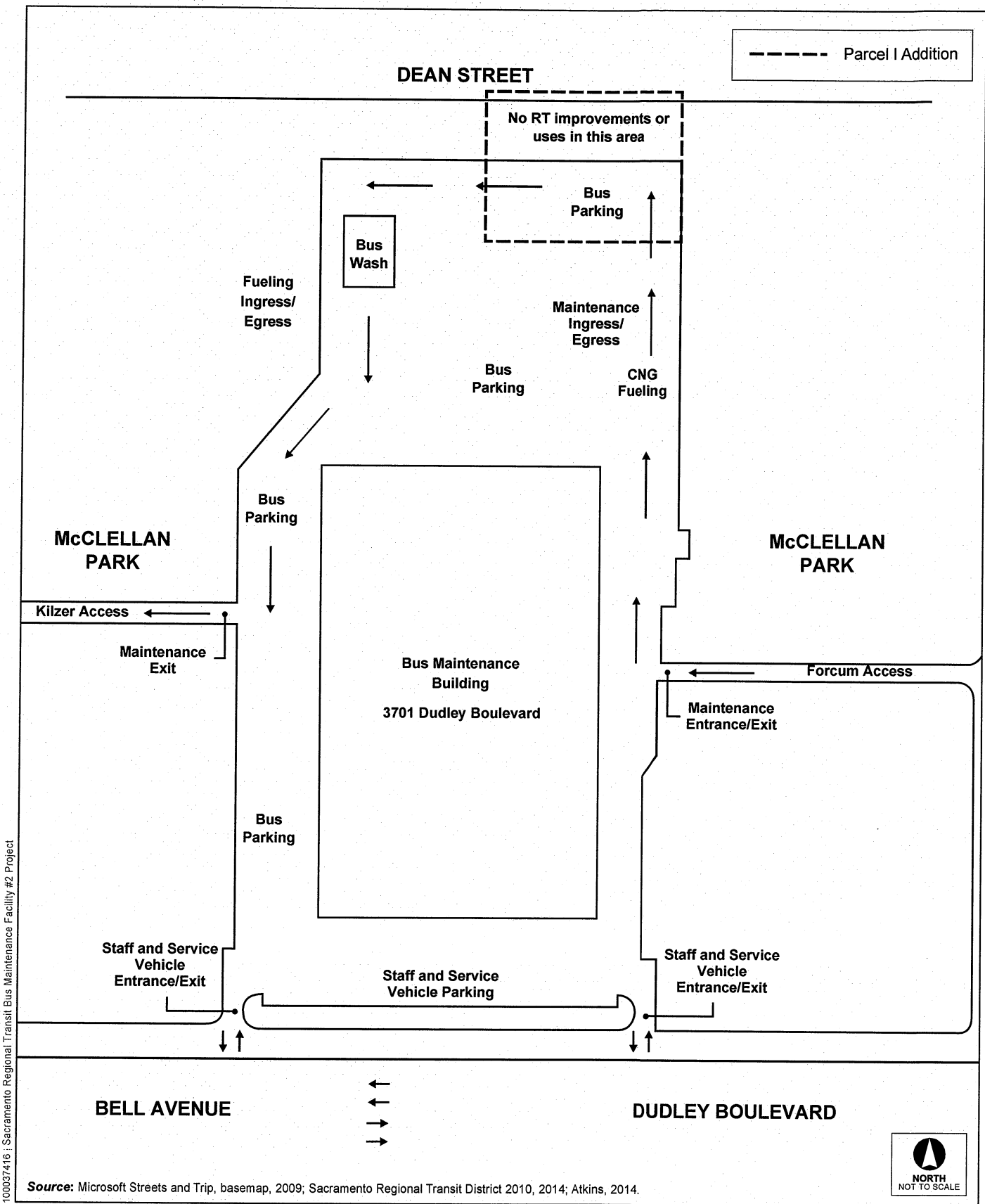


Figure 4
Circulation Plan

Construction

Construction of the Revised Project will take approximately 18 months and will occur in nine phases (see Table 1). Initial demolition began in June 2009 and the project will be completed by September 2016.

Phase	Begin Date	Completion Date
Exterior Facilities Demolition	June 2009	August 2009 (completed)
Gas Line Installation	January 2011	April 2011 (completed)
CNG Fueling Equipment Installation	July 2011	February 2013 (completed)
Steam Plant Demolition	July 2015	October 2015
Replace Roof, Building 655	July 2015	September 2015
Solar Installation, Building 655	July 2016	September 2016
CNG Service Building	March 2015	October 2015
Bus Washer Installation	June 2016	September 2016
Site Improvements	July 2015	July 2016

Source: Jim Olsen, 4Leaf, Inc, January 2014.

Analysis

The proposed inclusion of an additional parcel of land, including construction of improvements, would not change the impacts discussed in the BMF#2 2004 CE and 2005 IS/MND. The 2004 CE and 2005 IS/MND did not identify any significant impacts associated with the previously-proposed site plan and project features. However, because the majority of actions proposed under the 2004 CE have not occurred within three years of the CE approval, topics required to be addressed in a CE have been revisited and are discussed below in this document.

Metropolitan Planning and Air Quality Conformity

The Revised Project is located in the Sacramento Valley Air Basin, which is designated as nonattainment for federal and State 8-hour ozone, State and federal PM₁₀, and the federal and State PM_{2.5} standards. Monitoring data for Sacramento County shows that the county is currently in attainment of the federal PM₁₀ standard. However, the Sacramento Metropolitan Air Quality Management District (SMAQMD) must request redesignation and submit a PM₁₀ maintenance plan to EPA prior to any redesignation to attainment. Consequently, EPA has not officially changed the County's designation from nonattainment to attainment for the federal PM₁₀ standard. Under 40 C.F.R. Section 93.126 (Exempt Projects), the Revised Project is exempt from federal transportation conformity determination requirements. As shown in Table 2 of 40 C.F.R. Section 93.126, "Construction of new bus or rail/storage/maintenance facilities," is included among types of projects that are exempt. Nonetheless, the Revised Project would include implementation of Mitigation Measures AQ-3.1 and AQ-3.2 (Attachment 1) of the approved 2004 CE and 2005 IS/MND, which call for implementing the Sacramento Metropolitan Air Quality Management

District's mitigation for reducing emissions from heavy-duty construction vehicles and standard dust control measures, which would minimize fugitive dust emissions during construction.

Proposed Amendment – Parcel 1

The addition of Parcel 1 and the construction of improvements would not generate additional vehicle trips or increase operational air emissions. The acquisition and use of Parcel 1 would improve internal circulation within the Revised Project site only. There would be no changes to off-site circulation patterns or vehicle trips. Construction on Parcel 1 would increase the total area to be paved by less than one acre. Mitigation Measures AQ-3.1 and AQ-3.2 would be implemented, and the change to the project would not substantially increase the severity of this impact.

Zoning

The Revised Project is located at the former McClellan AFB in unincorporated Sacramento County within the West McClellan District of the larger McClellan Park. The project site is zoned Special Planning Area (SPA), which allows for continued use of the property and facilities at McClellan Park for the maintenance, repair, procurement, supply, distribution, and transportation of aircraft, parts, and component systems. The SPA originally supported the retention of existing uses and jobs while providing for future expansion of McClellan Park in a manner consistent with the capacity and capabilities of the McClellan facilities, equipment, and workforce. The project site was formerly used as an automotive repair facility; thus, the bus maintenance facility would be consistent with previous uses at the site as well as surrounding light industrial uses. Therefore, the Revised Project would result in no adverse effects on land use and zoning. There would be no effect on zoning at the parcel that adjoins Dean Street on the north.

Proposed Amendment – Parcel 1

The proposed amendment for the acquisition and use of Parcel 1 would not result in any inconsistencies with existing zoning because the parcel would also be used for bus circulation and parking, which is permitted by the SPA zoning for the site.

Traffic

As part of the environmental review for the McClellan Park Reuse Plan, Sacramento County studied the effects of redevelopment on transportation facilities at the former McClellan AFB as well as surrounding areas.² Since 2004, no new land uses have been proposed within McClellan Park that were not accounted for in the McClellan AFB Reuse Plan and no new traffic studies have been prepared since the approval of the 2004 CE and 2005 IS/MND and the McClellan Air Force Base Reuse Plan Supplemental Environmental Impact Report (SEIR). The McClellan Air Force Base Reuse Plan SEIR assumed industrial uses for the project site (1,272 daily trips, 178 during the A.M. peak hour, and 191 during the P.M. peak hour).

² County of Sacramento, *McClellan AFB Draft Final Reuse Plan, Draft SEIR*, July 2002.

The Revised Project still assumes the same number of trips as the 2004 CE and 2005 IS/MND for the BMF #2 (1,900 daily trips, 45 during the A.M. peak hour, and 80 during the P.M. peak hour). As analyzed in the 2004 CE and 2005 IS/MND, all intersections within the traffic study area would operate at acceptable levels of service (LOS D or better) considering both existing traffic and cumulative traffic impacts. The same analysis and conclusions apply to the Revised Project.

The internal bus circulation pattern for the Revised Project is shown in Figure 4. Bus access at the site would be from two access easements to Forcum Avenue on the east and Kilzer Avenue on the west. Bus traffic would enter from Forcum Avenue and exit onto Kilzer Avenue. The east driveway would be two-way to account for a small amount of other government-agency fueling of CNG, exiting the property to Forcum Avenue. The Kilzer Avenue driveway would also be two-way; however, it would primarily be used as an exit. Typically, buses would enter from the Forcum Avenue entrance and travel north to refuel at the CNG fueling area. Occasionally, buses would travel northwest within the site and pass through the bus washer. From there, buses would either park at bus stalls within the project site or enter the maintenance facility building for maintenance and repairs. Buses would enter and exit the maintenance facility from the north at the northeast corner of the maintenance facility building. On occasion, the CNG fueling area would also serve non-RT vehicles belonging to other government agencies). The non-RT vehicles would enter the site from Dudley Boulevard on the east, refuel, and then exit using the Forcum Avenue driveway. These changes to on-site circulation are mainly for improved internal flow and to separate buses from other non-bus vehicles. Because all on-site traffic would exit onto Dudley Boulevard as analyzed in the previous project, changes to internal circulation would not affect nearby roadway levels of service.

The 2004 CE and 2005 IS/MND concluded the Revised Project would also not interfere with existing or planned bicycle facilities in the Sacramento City/County Bikeway Master Plan. There are no existing bicycle facilities in the immediate vicinity of the McClellan park site, and the roadways would be upgraded with on-street bicycle facilities as McClellan Park is redeveloped. Implementation of the project would not result in removal of existing pedestrian facilities and would result in the installation of pedestrian sidewalks in accordance with Sacramento County regulations. Therefore, there would not be adverse changes to the existing transit, bicycle, or pedestrian systems. The installation of the gas pipeline, which was addressed in CEQA Addendum No. 2, only resulted in short-term temporary closures and detours of lanes during construction.

Proposed Amendment – Parcel 1

The addition of Parcel 1 would not generate additional vehicle trips. The acquisition and use of Parcel 1 would improve internal circulation on the Revised Project site and would not alter the existing bicycle or pedestrian facilities in the area. The additional parcel would not adversely affect existing transit, bicycle, or pedestrian systems by eliminating such non-motorized facilities, introducing design hazards, or impeding planned improvements to the facilities. Therefore, the inclusion of the additional parcel of land in the Revised Project would result in no new adverse traffic impacts.

Climate Change

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as a driving force for global climate change. Climate change is commonly used interchangeably with “global warming” and the “greenhouse effect.” Definitions of climate change vary between and across regulatory authorities and the scientific community, but in general can be described as the changing of the earth’s climate caused by natural fluctuations and anthropogenic activities that alter the composition of the global atmosphere. Individual projects contribute to the cumulative effects of climate change by emitting GHGs during demolition, construction, and operational phases. The principal GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor.

As discussed in the 2010 CEQA Addendum No. 2 and NEPA Re-Evaluation, it is expected that the Revised Project would result in short-term GHG emissions from the combustion of fuel during construction and long-term GHG emissions from local traffic increases (mobile sources). However, the Revised Project is a bus maintenance facility intended to reduce regional vehicle trips associated with passenger cars along roadways and freeways in the Sacramento region. The Revised Project would service up to 250 CNG buses, which would increase transit capacity and would contribute to a reduction in GHG emissions associated with personal vehicles. Because of this, the Revised Project would not be expected to result in a net increase in GHG emissions on a regional level. The SMAQMD has not adopted significance criteria or methodologies for estimating a project’s contribution of GHGs or evaluating its significance. However, no individual project, including the Revised Project, could, by itself, generate sufficient emissions of GHGs to result in a significant impact in the context of the cumulative effects of GHG emissions. Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, requires the California Air Resources Board to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions). It is also important to note that future State actions taken pursuant to AB 32, including requirements for lower carbon-content in motor vehicle fuels, improved vehicle mileage standards, and increased share of renewable energy in electricity generation would also serve, in time, to further reduce GHG emissions related to the Revised Project. Therefore, there would be no adverse effects related to GHG emissions.

Proposed Amendment – Parcel 1

The addition of Parcel 1 would not generate additional vehicle trips or increase operational air emissions. The acquisition and use of Parcel 1 would improve internal circulation on the Revised Project site and not increase the generation of GHG emissions.

CO Hot Spots

As mentioned previously, the Revised Project is exempt from transportation conformity determination requirements per 40 C.F.R. Section 93.126, which includes a requirement to perform a localized carbon monoxide (CO) hot-spot analysis. As analyzed under the traffic discussion, the Revised Project would

not result in any significant increases in local roadways or result in significant changes to the existing roadway traffic circulation patterns. Therefore, the Revised Project would not worsen any existing CO hot spots.

Proposed Amendment – Parcel 1

The addition of Parcel 1 would not require a localized carbon monoxide hot-spot analysis. The acquisition and use of Parcel 1 would improve internal circulation on the Revised Project site and would not worsen operations at nearby intersections or within the maintenance facility.

Historic Resources

Since the Revised Project received, and will receive additional, federal funding, compliance with Section 106 of the National Historic Preservation Act (NHPA) was and is required. In accordance with the NHPA, an area (“area of potential effects” [APE]) was delineated and identified in the previously approved 2004 CE and 2005 IS/MND around the project site to encompass potential direct and indirect effects on cultural resources that might occur within the area. No known prehistoric or historic archaeological sites are located in the project vicinity.³ In addition, the gas pipeline installed in 2013 did not traverse any cultural sites or resources outside the immediate project area. Because the Revised Project would involve ground-disturbing activities, there is a potential to disturb unknown archaeological resources during project construction. Mitigation Measure CR-2.1 (Attachment 2) from the 2004 CE and 2005 IS/MND would require that RT implement recommendations of a qualified archaeologist in the event of a discovery. Implementation of this mitigation measure would reduce potential impacts to archaeological resources to no adverse effect. Project-related construction activities may uncover unmarked graves. Implementation of Mitigation Measure CR-4.1 (Attachment 2) from the 2004 CE and 2005 IS/MND, which requires that the project contractor contact the Sacramento County Coroner to make a determination and provide recommendations on treatment and disposition in the event of a discovery or recognition, would reduce potential impacts due to disturbance to previously unidentified human remains to no adverse effect.

In regards to paleontological resources, the project area is underlain by alluvial soils developed on old river plains and terraces that have been reworked numerous times by river action. In their recent geologic history, it is unlikely that any pre-existing fossil-bearing deposits would remain intact.⁴ Consequently, no adverse effect on paleontological resources is expected.

Proposed Amendment – Parcel 1

The Revised Project would have no adverse direct or indirect effects on historic resources. The additional parcel of land is adjacent to the previously-analyzed project site and consists of an asphalt parking lot

³ JRP Historical Consulting, *Historic Architectural Resources Compliance under Section 106 of the National Historic Preservation Act and the California Environmental Quality Act for the Sacramento Regional Transit’s Bus Maintenance Facility at McClellan Park, Sacramento, California*, Letter Report, November 26, 2003.

⁴ Sacramento Regional Transit District, *Bus Maintenance Facility at McClellan Park Categorical Exclusion*, August 3, 2004, p. 3.2-2.

along with some unpaved and unimproved areas with no existing structures in the usable portion, and a drainage ditch, railroad tracks, and Dean Street in the unusable portion. The northern boundary of the APE originally delineated and identified in the 2004 CE and 2005 IS/MND extended to an area approximately between the drainage ditch and the railroad tracks (in the unusable portion of Parcel 1).⁵ Although Parcel 1 would extend slightly further north than the original APE evaluated, there would be no physical improvements or any modification of any structure or feature in that area, nor to any buildings north of Dean Street.

The addition of Parcel 1 as part of the project would involve additional excavation, but no demolition of structures would occur, and implementation of Mitigation Measures CR-2.1 and CR-4.1 would ensure that excavation and construction work ceases if either archaeological resources or human remains are discovered. Mitigation Measure CR-2.1 requires that RT retain a qualified archaeologist to evaluate potential archaeological finds and implement the archaeologist's recommendations, and Mitigation Measure CR-4.1, set forth in the 2004 CE and 2005 IS/MND, requires that RT's contractor notify the Sacramento County Coroner if human remains are found. The mitigation measures would apply to all planned activities on the additional parcel and would reduce potential effects from discovery of cultural resources to no adverse effect.

Noise

Under current conditions and as discussed in the 2004 CE and the 2005 IS/MND, there are no noise-sensitive receptors within 500 feet of the project site, which is the required screening distance for noise assessments by FTA for bus facilities located in areas with intervening buildings.⁶ The primary sources of noise associated with the Revised Project would be bus trips to and from the project site and general bus maintenance activities. Noise levels recorded in McClellan Park and its surroundings, which included former military operations, indicated that baseline noise levels are between 60 and 70 decibels (dB) within the project vicinity.⁷ Acceptable noise levels for industrial uses in the project area range from 50 to 70 dB. As stated in the 2004 Categorical Exclusion, exterior noise levels of up to dBA Ldn⁸ are normally acceptable for commercial, industrial, and public/governmental uses, per the City of Sacramento General Plan Noise Element. Also, according to the County of Sacramento's General Plan Noise Element, exterior noise levels of 75 dBA Ldn and lower are acceptable for industrial uses. Since maintenance activities associated with the Revised Project would be less intensive than military operations, noise levels generated by the Revised Project are not expected to exceed the established

⁵ Sacramento Regional Transit District, *Bus Maintenance Facility at McClellan Park Categorical Exclusion*, August 3, 2004, Figure 3.2-1.

⁶ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

⁷ County of Sacramento, *McClellan AFB Draft Final Reuse Plan, Draft SEIR*, July 2002. Table 3.5-2.

⁸ The unit of measurement used to describe a noise level is the decibel (dB). The human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, the "A weighted" noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A weighted measurements are written dB(A) or dBA. Noise standards for land use compatibility are stated in terms of the Community Noise Equivalent Level (CNEL) and the Day-Night Average Noise Level (Ldn). CNEL is a 24-hour weighted average measure of community noise. Ldn is a very similar 24-hour weighted average that weights only the nighttime hours and not the evening hours.

acceptable range of noise levels. Furthermore, potential sensitive receptors within the project vicinity are located outside of the 500-foot impact zone established by the FTA as the area of noise impact for bus maintenance facilities. Finally, the gas pipeline route traverses an undeveloped area, where there are no sensitive receptors, as discussed in Addendum 2.

Proposed Amendment – Parcel 1

The additional parcel of land contains no sensitive receptors and would not increase the previously-identified noise levels of the Revised Project site, because it would not add bus maintenance operations that would generate noise or increase the number of bus trips on and off the Revised Project site. Therefore, the Revised Project would have no adverse noise effects on surrounding land uses.

Vibration

As previously discussed in CEQA Addendum No. 2, the Revised Project would involve renovation and demolition of existing buildings, as well as construction of a new bus washer and CNG fueling area.

Although RT is a public transit district and is not subject to local regulations, RT will adhere to the County's noise ordinance in carrying out the Revised Project. Furthermore, construction and operation of the Revised Project would not involve new land uses, equipment, or other features that would result in substantial vibration within the project area. Therefore, there would be no adverse vibration effects.

Proposed Amendment – Parcel 1

The acquisition and use of Parcel 1 would not result in additional vibration effects because only grading and paving would take place; no heavy construction equipment or pile-driving activities that could generate vibration effects would be needed to improve Parcel 1. The additional parcel would not involve any additional land use, equipment, or increase in daily activities that would result in adverse vibration effects.

Acquisitions and Relocations

The previously-analyzed project site is currently being leased to RT by MP-655, LLC, a wholly-owned subsidiary of McClellan Business Park, LLC, the development entity hired by Sacramento County to market and redevelop the former Air Force base, as discussed in CEQA Addendum No. 2. The site is mostly vacant and is currently occupied by some RT Community Bus Service staff and is temporarily used for obsolete RT bus vehicle storage. Since the Revised Project (including the additional parcel of land and off-site portion where the gas pipeline was installed) is within McClellan Park that is intended to be purchased and redeveloped and would not require relocation of residences or businesses, the Revised Project would not result in adverse acquisition or relocation effects.

Proposed Amendment – Parcel 1

The Revised Project would require acquisition and use of a 1.503-acre parcel (Parcel 1) at the northeast corner of the previously-analyzed project site to provide improved internal circulation between the CNG

fueling operations and the bus washer, as well as additional parking. This parcel is owned by the County, but is presently not being used. The Revised Project would not require relocation of existing uses. RT use would occur only in the usable portion of the Parcel (i.e., the 0.705 acres south of the fence). There would be no RT activities north of the fence in the unusable portion.

Hazardous Materials

The former McClellan AFB is a National Priority List (Superfund) site. Contaminants on the site are mainly confined to groundwater contamination created at various industrial sites around McClellan due to the historical military, industrial, and aviation operations of the facility. Groundwater contaminants of concern are volatile organic compounds (VOCs). Hazardous materials historically handled at the former McClellan AFB included industrial solvents, caustic cleaners, electroplating chemicals, heavy metals, fuels, oils, lubricants, paints, pesticides, and radioactive substances. The Department of Defense (DOD) has executed a Federal Facilities Agreement with the Environmental Protection Agency (EPA) in which the DOD affirms its responsibility to remediate the contamination. In addition, the DOD is responsible for the costs to clean the site and all liability associated with the contamination through the Economic Development Conveyance with the County of Sacramento. Therefore, the County and any successors are indemnified from any liability as long as they do not disturb hazardous materials underground. The DOD manages an Encroachment Permit process for all digging on the former base. Under the terms of this permit, DOD will oversee all encounters with contaminated soil and manage the contaminated construction spoils. Upon transfer of the property, McClellan Business Park, LLC will take over and administer the Encroachment Permit process. There are no restrictions affecting the reuse of the facilities and no issues that pose an environmental risk.

Subsurface (e.g., potential soil and groundwater contaminants) and surface (e.g., past on-site building uses, waste containers and above-ground storage tanks, storage bins, asbestos-containing materials (ACM), and lead) hazardous materials are known to exist at the project site, and soil and groundwater contamination exists at the larger former McClellan AFB site. As discussed in the 2005 IS/MND and the CEQA Addendum No. 2 (“previous environmental documents”), while groundwater is not likely to be encountered during development activities associated with the Revised Project, exposure to contaminated soils in the vicinity of the project site is possible. The primary contaminants are volatile organic compounds, polychlorinated biphenyls, and heavy metals. Furthermore, hazardous waste containers found on site could also be leaking contaminants into the ground and nearby drains. The existing PG&E gas pipeline that enters the west side of the site could also be leaking contaminants into the soil and groundwater. There has been no evidence to date to suggest that the gas pipeline is leaking. Furthermore, the PG&E 3,750-foot, 4-inch steel gas pipeline from Roseville Road to the bus maintenance facility area operates in compliance with federal, state, and local regulations, and, therefore, does not pose an environmental hazard.

As discussed in the previous environmental documents, during grading and excavation, demolition, and other construction activities, construction workers and members of the public could be at risk for exposure to contaminated soil and/or groundwater. Construction workers would be at the greatest risk of exposure, particularly if hazardous materials in the soil or groundwater are not adequately identified and proper precautions are not implemented. Exposure to on-site environmental contamination, if

encountered, could occur through dermal contact or inhalation and result in various short-term or long-term health effects specific to each chemical present if of sufficient concentration and duration. Acute effects, often resulting from a single exposure, could range from major to minor effects, such as nausea, vomiting, headache, or dizziness.

As discussed in the previous environmental documents, site remediation itself, if required, could also have adverse health and safety impacts. If site remediation were conducted without appropriate safeguards, workers, and possibly the public, could be exposed to chemical compounds in soils, soil gases (gases or vapors, mostly air, trapped within soil), or groundwater, or to airborne chemicals. Workers directly engaged in on-site activity would face the greatest potential for exposure. The public could be exposed to contaminants if access to the project site were insufficiently controlled. The Air Force has an Encroachment Permit process in place to monitor and provide guidance during construction operations for on-site activities. The proposed bus maintenance facility includes operation of a gas pipeline extending from Roseville Road into the maintenance facility area, already installed. If contaminants are encountered during construction of on-site activities, the Air Force would be notified and remediation safeguards would be placed into effect immediately.

As discussed in the previous environmental documents, worker and public health/safety requirements would apply during remediation activities. Potential adverse impacts of remediation would be mitigated almost entirely by legally-required safety and hazardous waste handling precautions. For hazardous waste workers, California Division of Occupational Safety and Health regulations mandate an initial 40-hour training course and subsequent annual training review. Additionally, site-specific training would be required for some workers. These measures, along with application of cleanup standards subject to review by responsible agencies, would serve to protect human health and the environment during site remediation, thus reducing potential impacts. Nevertheless, unless these plans are adequately prepared and implemented, the Revised Project could pose a significant impact by creating a substantial human health hazard or involving the disposal of materials in a manner that poses substantial hazards to people or to animal or plant populations. Implementation of Mitigation Measures HM-1.1 and HM-1.2 (Attachment 3) from the 2004 CE and 2005 IS/MND, which require preparation and implementation of a Site Health and Safety Plan and an on-site industrial hygienist present, as necessary, during project construction, would reduce potential impacts from exposure to hazardous materials to no adverse effect.

Prior to installation of the CNG fueling station in 2013, RT coordinated with McClellan Park in 2011 to assess and remediate an area was known to contain radium-226 in excess of background levels in soil (DOD cleanup site PRL S-030A). That area was part of a larger site that DOD had identified for cleanup activities. Remediation actions at the CNG fueling station location included excavating 1 to 2 feet below the ground surface that had been identified as impacted by radium-226. Asphalt and soils removed were transferred to two separate staging piles and then transported off-site to an Air Force radiologically controlled area. Field surveys were performed by the remediation contractor to demonstrate that no

residual radioactive materials remained at that location that could result in a risk to future occupants.⁹ The CNG fueling station footprint is outside the Parcel 1 boundary.

The Revised Project would include demolition and renovation of buildings constructed prior to 1960. As discussed in the 2004 CE and 2005 IS/MND, the 1995 asbestos survey of the former McClellan AFB states that 205 buildings with some form of ACM exist at McClellan Park and could include buildings on the project site. Implementation of Mitigation Measure HM-2.1 (Attachment 3) from the 2004 CE and 2005 IS/MND, which requires RT to conduct surveys prior to construction to identify structures with ACMs, would reduce potential adverse effects from release of ACMs.

Day-to-day operations of the Revised Project would include bus washing and refueling, equipment cleaning, and deposition of fuel oils, and potential accidental spills of hazardous materials could adversely affect the health and safety of workers at the facility and adjacent uses. However, hazardous wastes resulting from day-to-day operations would not exceed existing volumes and would be disposed of properly in compliance with federal, State, and local regulations, similar to the procedures that RT already follows at the existing Midtown Maintenance Facility. Therefore, there would be no additional adverse effects resulting from a public health hazard as a result of RT's routine operations at the new bus maintenance facility.

Proposed Amendment – Parcel 1

The additional parcel of land does not contain any structures that need to be demolished. Parcel 1 would improve internal circulation without increasing overall operations, and the additional parcel would not result in an increase of the day-to-day washing and refueling activities at the bus maintenance facility that would result in an increase in hazardous materials use. A Preliminary Summary Report (“Report”) of documented environmental conditions for a 0.705-acre area extending north to the east-west fence that separates the usable portion of Parcel 1 from the unusable portion as completed in June 2010 by Geocon Consultants.¹⁰ The Report included a review of documents provided by RT, Sacramento County, and the United States Air Force (USAF) Real Property Agency. In addition, a site visit was performed on May 17, 2010 to observe existing site conditions. The Report concluded that no Installation Restoration Program or Potential Release Location contamination sources, targeted assessment, cleanup or significant soil impacts have been identified within the usable portion of Parcel 1. The existing nested piezometers would be protected in place and adjusted to grade during planned excavation, grading, and pavement work, per the recommendations of the 2010 Report.

The study area in the Report noted the presence of the drainage ditch and railroad tracks north of the fence that separates the usable portion of Parcel 1 from the unusable portion. The drainage ditch was previously used to transfer wastewater effluent and may have received discharges from fuel tanks. Under

⁹ Cabrera Services Inc., Final Status Survey Report, Potential Release Location S-030A SAC RT, McClellan, prepared for Sacramento Regional Transit, 2012.

¹⁰ GEOCON Consultants, Inc., “Bus Maintenance Facility – Parcel 1 McClellan Park, Sacramento, California, Preliminary Summary Report – Environmental Review,” letter report to Dawn Fairbrother, Sacramento Regional Transit District, June 4, 2010.

the DOD cleanup program, the drainage ditch (identified as site PRL P-009) has land use restrictions in place for PRL P-009 based on identified soil and soil vapor impacts.¹¹ The drainage ditch is within Parcel 1, but it is not within the usable area that RT will be modifying to accommodate the bus circulation improvements.

The Final Remedial Design/Remedial Action Work Plan to remove the contaminated soil from the drainage ditch was prepared by McClellan Park's remediation contractor in May 2013, pursuant to an agreement (Administrative Order on Consent for Remedial Investigation/Feasibility Study and Remedial Design/Remedial Action for Cleanup of Portions of the Former McClellan AFB) between McClellan Business Park, LLC, the U.S. Environmental Protection Agency, Department of Toxic Substance Control, and the Central Valley Regional Water Quality Control Board (Attachment 4). Remediation will be completed prior to RT construction activities in Parcel 1. Contaminated soil from the ditch (approximately 100 cubic yards) will be excavated and managed elsewhere at McClellan Park by the remediation contractor. A small portion of the proposed excavation extends a few feet into the usable portion of Parcel 1, just south of the fence.¹² The excavation and removed material will be sampled and analyzed to ensure contamination in excess of cleanup levels has been fully delineated and removed. If post-excavation sampling demonstrates that the full extent of contamination has not been captured and removed, the excavations will be extended as needed, to a depth not to exceed 15 feet below ground surface (bgs), to remove the contamination. If an excavation floor or sidewall is extended, post-excavation sampling will be conducted for the expanded floor or sidewall. Upon receipt of confirmation that the soil exceeding cleanup levels has been adequately removed, contaminated soil that exceeds the cleanup levels set forth in the overall site cleanup plan will be disposed at an EPA-approved waste management facility, the excavation area will be filled either with excavated soil suitable for reuse or imported backfill, and the excavation area will be restored to its pre-excavation condition. Once the remedial action has been completed, a Remedial Design Completion Plan (RDGP) will be prepared and submitted to the Regulatory Agencies. An institutional control (IC) in the form of deed restrictions and land use controls will be maintained for any site where contaminants remain below industrial use levels, but above levels allowing for residential use.¹³

Therefore, acquisition and use of Parcel 1 would not result in any new or additional adverse hazardous materials contamination effects.

Community Disruption and Environmental Justice

The project site is located within McClellan Park, which already supports industrial, commercial, and aviation uses. No residences, schools, or other sensitive uses are located near the project site. The

¹¹ GEOCON Consultants, Inc., "Bus Maintenance Facility – Parcel 1 McClellan Park, Sacramento, California, Preliminary Summary Report – Environmental Review," letter report to Dawn Fairbrother, Sacramento Regional Transit District, June 4, 2010.

¹² Tetra Tech, Inc., McClellan Business Park Initial Parcel #3 Restoration Project, Final Remedial Design/Remedial Action Work Plan, May 2013. Figure 3-5.

¹³ Tetra Tech, Inc., McClellan Business Park Initial Parcel #3 Restoration Project, Final Remedial Design/Remedial Action Work Plan, May 2013. Figure 3-5.

Revised Project would result in a new maintenance facility on property already leased by and minimally occupied by RT. The Revised Project would not result in community disruption, land use changes, or disproportionately high and adverse human health or environmental effects related to minority or low-income populations. As mentioned above, any hazardous materials at the site would be stored, handled, and disposed of in accordance with federal, State, and local regulations. Thus, the Revised Project would have no new adverse effects related to community disruption and environmental justice.

Proposed Amendment – Parcel 1

The addition of Parcel 1 would not result in land use changes, community disruption, adverse human health or environmental effects, or additional hazardous materials use or disposal. The acquisition and use of Parcel 1 would improve internal circulation without increasing operations, which would increase efficiency at the maintenance facility.

Use of Public Parkland and Recreational Areas

The Revised Project would not increase population in the area; therefore, there would be no increase in demand for parks and recreational areas. There are no publicly-owned parks and recreational areas within the project vicinity. Consequently, the Revised Project would have no adverse effects on these resources.

Proposed Amendment – Parcel 1

The acquisition and use of Parcel 1 would not result in an increased population in the surrounding area. Therefore, its use by RT would not result in an increased demand for parks and recreational areas.

Wetlands

The additional parcel of land is an asphalt parking lot (useable portion), north of which is a drainage ditch, railroad tracks, and Dean Street (unusable portion). The project site is located in a mostly developed business park, with some pockets of undeveloped areas. The DOD determined the drainage ditch contained no evidence of sensitive habitat and is routinely maintained by clearing and grading. Based on a site visit by a PBS&J biologist on June 8, 2009, and re-confirmed on November 22, 2013, there was no evidence of wetlands on or immediately adjacent to the BMF#2 project site, including the additional 1.503-acre parcel.

Proposed Amendment – Parcel 1

Parcel 1 consists of an asphalt parking lot that includes some unpaved and unimproved areas to the east. There is no evidence of wetlands on, or adjacent to, the Revised Project site. As a result, the acquisition and use of this parcel for improved internal circulation by RT would have no direct or indirect effects on wetlands.

Floodplains

The project site for the BMF#2, including the additional parcel of land, is not located within a Federal Emergency Management Agency (FEMA) designated 100- or 500-year floodplain area. The route for the gas pipeline is outside the designated 100- and 500-year floodplain area until it crosses under the railroad tracks to Roseville Road, as discussed in CEQA Addendum No. 2. Therefore, the Revised Project would have no adverse effects related to floodplain hazards.

Proposed Amendment – Parcel 1

Parcel 1 is located adjacent to the previously-analyzed project site and is not located in a floodplain area. The additional parcel of land would improve internal operations and daily functions at RT's BMF #2. It would not have any adverse effects related to floodplain hazards.

Water Quality, Navigable Waterways, and Coastal Zones

As discussed in the 2004 CE and 2005 IS/MND, the land disturbance and construction activity associated with the Revised Project may result in potential temporary impacts to water quality and potential violation of water quality objectives and discharge prohibitions stipulated in the Sacramento Valley Basin Plan, prepared and administered by the local Regional Water Quality Control Board.

Grading, excavation, and construction activities could disturb either existing and/or introduced soil, resulting in increased rates of erosion during project development. Surface water runoff could remove particles of fill, excavated soil, or construction materials from the project area, or could erode soil down gradient.

Chemicals (e.g., nutrients, metals, hydrocarbons, pesticides, and herbicides) may be attached to sediment particles. Potential sources of these chemicals include the inadvertent release of petroleum-based fluids used in construction equipment and machinery, and possible construction materials that contain hazardous constituents or heavy metals. Pre-existing soil contamination could be released during construction activities; however, the Air Force Encroachment Permit covers any cleanup associated with accidental exposure of pre-existing soil contamination during construction. Chemicals released with construction-related runoff may be toxic to aquatic organisms and may impair water quality conditions in Arcade Creek and the Natomas East Drain Canal (NEMDC), where runoff from the site would flow.

Furthermore, operational activities such as bus washing, cleaning of bus maintenance equipment, release of bus or maintenance equipment fuel and oil deposits, and release of contaminants from parked cars and buses would also contribute to potential water quality degradation. Deposits of these constituents on the ground surfaces could be swept up during storm events and carried into Arcade Creek and the NEMDC.

However, as part of the provisions of the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Construction Permit and the existing NPDES permit in place for McClellan Park, RT and PG&E are required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) prior to construction and operation of the proposed project. This SWPPP is submitted to Sacramento County Building Department as part of the permit process and is

approved by the SWRCB. The SWPPP includes standard Best Management Practices (<http://www.dot.ca.gov/hq/construc/stormwater/manuals.htm>) that the construction contractor must follow to prevent soil erosion during ground-disturbing activities. The SWPPP also includes a construction and post-construction pollutant control plan and associated monitoring program to control surface runoff and discharge of pollutants. The NPDES permits also require RT to prepare a grading plan for the Revised Project prior to construction and operation. The SWPPP and monitoring program is prepared and submitted concurrently with the final grading plan to the Central Valley Regional Water Quality Control Board. Preparation of these plans and adherence with the recommended measures, as required by law, would mitigate the potential adverse water quality effects of the bus maintenance facility.

The project site is not located near a coastal zone or in close proximity to a navigable waterway. The nearest navigable waterway is the American River, approximately 5 miles southwest from the site. Thus, the Revised Project would have no adverse effects on navigable waterways or coastal zones.

Proposed Amendment – Parcel 1

Parcel 1 is not located near a coastal zone or in close proximity to a navigable waterway. Grading and paving of the usable portion (0.705 acres) where the bus circulation and parking improvements are proposed would be subject to the Best Management Practices in the SWPPP. There would be no physical changes to the area north of the fence containing the drainage ditch, railroad tracks, or Dean Street in the unusable portion. Therefore, the acquisition and use of Parcel 1 would not create any additional adverse water quality effects.

Ecologically-Sensitive Areas and Endangered Species

On June 8, 2009, an Atkins biologist conducted a reconnaissance-level biological survey at the BMF#2 site. The survey consisted of walking the entire site, followed by a brief examination of the interior of buildings to be demolished as a part of the previously-approved and revised project. The survey included an evaluation of the site for any special-status species known from the region, any nesting birds protected under the Migratory Bird Treaty Act, roosting bats, and wetlands.

As described in the 2004 CE and 2005 IS/MND, the BMF#2 site is entirely developed, with the exception of two small unpaved areas along the north perimeter. These small areas are occupied by mowed ruderal (weedy) grassland species. No wetlands were present in these areas, nor was there any habitat for special-status species known from the region. The DOD determined the drainage ditch contained no evidence of sensitive habitat and is routinely maintained by clearing and grading. The project site does not include forest land, and the project would not result in the loss of forest land or the conversion of forest land to non-forest use. The interior of the buildings contained rock doves (pigeons) (*Columba livia*), and domestic cats. No evidence of use by bats was observed in any of the buildings.

On November 22, 2013, an Atkins biologist visited the Parcel 1 site to determine whether vegetation and wildlife conditions had changed compared to the June 2009 observations. There have been no changes in biological resources conditions in the useable portion of Parcel 1 where the bus circulation and parking

improvements are proposed. In the unusable portion of Parcel 1, between the fence and the railroad tracks, there is a shallow, unlined drainage ditch. The drainage ditch will be excavated and soils removed as part of the DOD's cleanup of the ditch to remove contaminants, as described above. Further, no changes to the drainage ditch are required or proposed by RT to accommodate the internal bus circulation and parking activities that would be accommodated by the acquisition of Parcel 1.

Proposed Amendment – Parcel 1

Based on the survey data described in CEQA Addendum No. 2 and site observations in November 2013, no sensitive biological resources are present at the BMF#2 site or Parcel 1, and none would be affected by the acquisition of Parcel 1 and use of the useable portion of Parcel 1. Therefore, implementation of the Revised Project would have no adverse effects on sensitive biological resources.

Safety and Security

The Revised Project would not result in an increase in population, and would result in the same increase in employment assumed in the 2004 CE and 2005 IS/MND. Thus, no additional fire or police services would be required to serve the Revised Project. The project site, as well as the surrounding McClellan Park, are served by the Sacramento County Sheriff Department and would not require additional police services. Additionally, the Revised Project would be secured by a security fence and partial block wall, an electronic security system, and would be patrolled by RT Police. The additional parcel of land would be secured by a gate which would provide an additional emergency evacuation route, and emergency vehicle access. These measures would help to reduce the need for additional law enforcement services. Therefore, there would be no adverse effects on police services.

The on-site CNG fueling area is required by the State Building Code to meet rigorous fire/explosion prevention standards as well as code requirement for barriers and separation for all spark proceeding activities. Similarly, the PG&E 4-inch steel gas pipeline operates under strict local and state regulations to avoid risks from accidental rupture or other security considerations. Compliance with these requirements would result in no adverse effects on fire protection services.

Proposed Amendment – Parcel 1

The acquisition and use of Parcel 1 would not result in an increase in population. It would result in the same increase in employment assumed in the 2004 CE and 2005 IS/MND. The parcel would be secured by a gate that provides an additional emergency evacuation route and emergency vehicle access. These measures would not require additional law enforcement services or create any adverse effects on police services.

Construction

Construction of the Revised Project would take approximately 18 months and would include ground-disturbing activities, such as grading and excavation. These activities could cause temporary water quality, traffic, noise, and air quality impacts.

As discussed above, preparation and implementation of a SWPPP during construction would ensure that construction-related water quality and stormwater discharge impacts would not be adverse.

All construction activities would occur at BMF#2 and within the usable portion of Parcel 1 only (i.e., south of the fence, on RT property). The on-site construction activities would not cause lane closures or disruptions to adjacent streets and intersections. Temporary construction noise could occur and as reported in the 2004 CE and 2005 IS/MND, noise levels could reach a maximum of up to 89 dB during the daytime and could substantially increase existing noise levels. These activities would occur in compliance with the County Noise Ordinance and would not occur during nighttime hours, on Sundays, or on various public holidays. Since there are no noise-sensitive land uses identified within 0.5 mile of the project site, or the additional parcel of land, there would be no adverse effect related to construction noise.

As discussed above under the Air Quality Conformity discussion, the Revised Project would include implementation of Mitigation Measures AQ-3.1 and AQ-3.2 of the approved 2004 CE and 2005 IS/MND, which are the SMAQMD's standard techniques for reducing emissions from heavy-duty construction vehicles and fugitive dust emissions during construction.

Proposed Amendment – Parcel 1

The addition of Parcel 1 would not cause lane closures or disruptions to adjacent streets and intersections during construction. The acquisition and use of Parcel 1 would improve internal circulation and operational activities within the usable portion of the Revised Project site. There would be no physical modification of Dean Street. The usable portion of the additional parcel is partially paved and includes some unpaved and unimproved areas to the east of the parking lot. Grading and paving of the useable portion of the Revised Project site (0.705 acres) would also be subject to the Best Management Practices in the SWPPP. Mitigation Measures AQ-3.1 and AQ-3.2 would be implemented, and the change to the project would not substantially increase the severity of this air quality impact.

Conclusion

Based on the analysis and discussion above, the Revised Project still meets the criteria for a NEPA categorical exclusion in accordance with 23 C.F.R. Section 771.117, and RT certifies that the project falls under the following criteria:

- 1) The action does not have any significant environmental impacts as described in 23 C.F.R. Section 771.117(a).
- 2) The action does not involve unusual circumstances as described in 23 C.F.R. Section 771.117(b).
- 3) The action is consistent with the circumstances described in 23 C.F.R. Section 771.117(d)(9) that pertains to

Construction of new bus storage and maintenance facilities in areas used predominantly for industrial or transportation purposes where such construction is not inconsistent with existing zoning and located on or near a street with adequate capacity to handle anticipated bus and support vehicle traffic.

- 4) The action is consistent with circumstances described in 23 C.F.R. Section 771.129 regarding reevaluations for CE designations to establish if it remains valid.

As described in the analysis above, no revisions are needed in the BMF#2 2004 CE and 2005 IS/MND because: (1) there have not been substantial changes in the proposed action relevant to environmental concerns; (2) no new significant impacts would result from the proposed changes included in the Revised Project; (3) no substantial changes to environmental circumstances have occurred since the CE and IS/MND were approved in 2004 and 2005; and (4) no new information relevant to environmental concerns bearing on the proposed action has come to light that would indicate the potential for new significant impacts not discussed in the 2004 CE and 2005 IS/MND. Therefore, no further evaluation is required pursuant to the Council on Environmental Quality Regulations for Implementing NEPA Section 1502.9, and no subsequent negative declaration is needed pursuant to CEQA Guidelines Section 15162 and 15164.

The 2004 CE is re-approved, and will be submitted to the FTA for approval.

The documents and other materials that constitute the record of proceedings upon which the Board of Directors will base its decision on the Revised Project are located in the Engineering and Construction Division Office, 2811 O Street, Sacramento, California 95816. The custodian of these documents and other materials is the Regional Transit Services Manager.

Vehicular traffic is the main source of CO. The highest concentrations of CO are found along sidewalks and at intersections, where cars are idling or operating in slow, congested conditions. In particular, intersections that are rated to operate at LOS E or F are locations where a potential CO violation could occur. There are no intersections within the project vicinity that operate at levels worse than LOS D (see Section 3.6, Transportation above for discussion of traffic impacts).

Sensitive Receptors. Land uses such as schools, hospitals, residences and convalescent homes are considered to be relatively sensitive to poor air quality because the young, the old, and the infirm are more susceptible to respiratory infections and other air-quality-related health problems than the general public. There are no sensitive receptors in the immediate vicinity of the project site. The nearest sensitive receptor is an elementary school located more than half a mile away from the site. Adjacent land uses are predominantly commercial and light industrial uses.

Environmental Analysis

AQ-1 The proposed bus maintenance facility would not conflict with the regional Air Quality Plan. (NI)

Automobile and truck emissions are the primary source of ROG and NOx (ozone precursors). These pollutants are addressed in regional and county air quality attainment plans. Development of the proposed bus maintenance facility would contribute to growth of the RT transit system, which is an adopted transportation control measure under the current SMAQMD Air Quality Plan. Without an adequate and expanded maintenance and operations facility, growth of the RT bus system is not possible. Expansion of bus service could contribute to a shift away from single-occupant motor vehicle transportation. This shift could help reduce air pollutant emissions through a reduction in local and regional vehicle miles traveled and would be consistent with the adopted SMAQMD AQAP. Implementation of the proposed project could therefore assist the region in meeting state and federal clean air standards. In addition, implementation of the new facility would allow RT to proceed with phasing in an all-CNG bus fleet. This conversion of the bus fleet would also assist the region in meeting air quality standards. As a result, the project would not conflict with or obstruct implementation of the AQAP adopted by SMAQMD. In fact, it would help implement both the Metropolitan Transportation Plan and the Air Quality Attainment Plan.

AQ-2 The proposed bus maintenance facility would not violate air quality standards, expose sensitive receptors, or create odors. (LTS)

Federal and state regulatory agencies set upper limits on airborne concentrations of ozone, CO, NOx, SOx, particulate matter, and lead. The Sacramento Valley Air Basin is an attainment area for ozone, NOx, SOx, and lead. Vehicular emissions are the major sources of these criteria air pollutants. The use of unleaded gasoline has removed the concern of lead emission from vehicles. Also, unleaded gasoline emits low levels of ozone, Nox, and SOx. Due to the nature of the proposed project, a bus maintenance facility that would service and clean buses,

operation of the facility is not expected to result in increases in these criteria pollutants. Therefore, the project would not have an adverse effect on regional compliance with ambient air quality standards. Particulate matter (PM₁₀) emissions are of concern during the construction phase of the project and are discussed below. This impact is considered less than significant.

There are no sensitive receptors located within the vicinity of the proposed project. However, an elementary school is located approximately a half mile away from the project site. None of the activities associated with the proposed project would have the potential to expose nearby sensitive receptors to objectionable odors. Industrial and commercial operations such as wastewater treatment plants, sanitary landfills, petroleum refineries, chemical factories, and paint and coating operations are typical facilities that emit objectionable odors. The proposed project its operations are not known to emit substantial objectionable odors, such as diesel exhaust emissions, which would impact sensitive receptors or sensitive land uses since this maintenance facility is expected to service buses fueled by compressed natural gas (CNG).

AQ-3 Construction of the proposed bus maintenance facility would create significant air pollutant emissions during construction activities. (PS)

Exhaust emissions, primarily ROG and NO_x, during construction would result from vehicular traffic generated by the construction equipment and machinery. SMAQMD has standard recommended mitigation measures for reducing emissions from heavy-duty construction vehicles and these mitigation measures shall be implemented with this project. Furthermore, the re-grading and re-paving activities associated with construction of the project could result in the emissions of dust particles (including potential PM₁₀ emissions). Without mitigation, dust emissions could result in a *potentially significant impact*.

MITIGATION MEASURE. Implementation of the following mitigation measures would reduce potential construction-period air quality impacts to less-than-significant levels:

AQ-3.1 Implement SMAQMD Mitigation for Reducing Emissions from Heavy-Duty Construction Vehicles. RT shall provide a plan for approval by SMAQMD demonstrating that the heavy-duty (greater than 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NO_x reduction and 45 percent particulate reduction compared to the most recent CARB fleet average. RT shall submit to SMAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and hours of use or fuel throughput for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity

occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide SMAQMD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.

AQ-3.2 Implement Standard Dust Control Measures. Standard dust control measures, listed below, shall be implemented during project construction. These measures shall be incorporated into the contractor bid specifications.

- a. Sprinkle all unpaved construction areas, including stockpiles of soil, sand or similar materials, with water at least twice a day during grading and excavation to reduce dust emissions. On hot or windy days, watering shall be required more frequently, resulting in particulate emission reductions by up to 50 percent.
- b. Cover stockpiles of soil, sand and similar materials with tarp.
- c. Cover trucks hauling dirt and debris to reduce spillage onto paved surfaces.
- d. Sweep dirt or debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter through vehicle movement over these surfaces.

Conformity Assessment

Implementation of the bus maintenance and operations facility as a federally funded project requires a demonstration of project conformity with regional transportation plans and air quality plans for attainment of the ambient air quality standards. The Metropolitan Transportation Plan (MTP) and transportation model developed by SACOG include the bus maintenance and operations facility and encourage replacement of diesel fleets with CNG-powered vehicles. Transit improvements such as this have been adopted as transportation control measures. This means that this project is considered by the federal conformity rule as a "regionally significant" project, and that it is in conformity with the SMAQMD Air Quality Plan.

In order to demonstrate conformity with the federally approved MTP and the California Clean Air Act (CCAA), a project must (1) come from a transportation plan and program that have been found to conform, and (2) not cause or contribute to any new localized pollutant violations or increase the frequency or severity of any existing violations.

The project is in compliance with transportation conformity regulations as defined by 40 CFR Part 93, Subpart A. The project would not interfere with any transportation control measures; in fact, the project allows for a CNG fleet, planned fleet expansion, and improved public transit, which are air quality transportation control measures. The MTP and transportation model developed by SACOG include this bus maintenance and operations facility project that serves regional transportation needs. The proposed project is included among the road and transit improvements that are counted upon to

Environmental Analysis

CR-1 *The proposed bus maintenance facility would have no effect on historical resources. (NI)*

Two of the structures within the APE would be demolished as part of the development of RT's bus maintenance facility, including Buildings 656, 658, and 695. These buildings were constructed in 1954 and 1965 and are not historic structures 50 years or older. Furthermore, based on the historic resource evaluation completed for the proposed project (see Appendix A), these buildings retain integrity but they lack historic and architectural significance. They served routine logistical functions on the McClellan AFB and are not important for their association with the role McClellan AFB played in the significant historic contexts of the Cold War. The buildings are also not associated with any known historic person. These buildings do not appear to embody distinctive architectural or engineering qualities and also have not yielded, and will likely not yield, important information for history.¹⁶ Since these buildings are not listed in or potentially eligible for the NRHP, their demolition would not result in an adverse effect. Similarly, none of the other structures within the APE are listed or considered eligible. Thus, the proposed bus maintenance facility would not have a direct or indirect effect on historic resources.

CR-2 *The proposed bus maintenance facility would have no effect on known archaeological resources but could encounter previously unknown resources. (PS)*

As described above in Environmental Setting, no known prehistoric or historic archaeological sites were identified on the project site, and the nearest sites of significance are located approximately 2 miles away from McClellan Park where project activities would not occur. Therefore, the proposed project would not affect known archaeological resources. However, it is possible that previously unknown and unrecorded archaeological resources may be discovered during construction activities. As a result, project-related ground disturbing activities could damage or disturb archaeological resources. This impact is considered potentially significant.

MITIGATION MEASURE. The following mitigation measure would reduce this potentially significant impact to archaeological resources to a less-than-significant level. (LTS)

CR-2.1 *Cease Work upon the Discovery of Archaeological Resources.* In the event of discovery or recognition of any archaeological resources during project construction, the contractor shall halt construction until a qualified archaeologist can evaluate such finds. RT shall implement the recommendations of the

¹⁶ JRP Historical Consulting. *Historic Architectural Resources Compliance under Section 106 of the National Historic Preservation Act and the California Environmental Quality Act for the Sacramento Regional Transit's Bus Maintenance Facility at McClellan Park, Sacramento, California.* Letter Report. November 26, 2003. Page 5.

archaeologist concerning proper removal and handling of the discovered archaeological resources, subject to SHPO approval.

CR-3 *The proposed bus maintenance facility would have no effect on unique paleontological resources. (NI)*

As described above under Environmental Setting, no unique paleontological resources are known to exist at the project site. In addition, it is unlikely that significant fossils are located in the geologic deposits, which underlie the project site. Therefore, construction and operation of the proposed project would not affect such resources.

CR-4 *The proposed bus maintenance facility could disturb previously unidentified human remains. (PS)*

The project site is not located on a site known to contain human remains. However, it is possible that excavation, grading, and trenching activities associated with project-related construction activities may uncover unmarked human remains. As a result, project-related ground disturbance could disturb human remains, a potentially significant effect.

MITIGATION MEASURE. The following mitigation measure would reduce this potentially significant impact to a less-than-significant level. (LTS)

CR-4.1 *Cease Work upon the Discovery of Human Remains.* In the event of discovery or recognition of any human remains at the project site, the contractor shall contact the Sacramento County Coroner, pursuant to Section 7050.5(b) of the California Health and Safety Code. In this event, there would be no further excavation or disturbance of the site until the coroner determines that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code.

The Coroner, upon recognizing the remains as being of Native American origin, will contact the Native American Heritage Commission within 24 hours. No further disturbance of the site may be made except as authorized by the County Coroner. The Commission has various powers and duties to provide for the ultimate disposition of any Native American remains, including the designation of a Native American Most Likely Descendant. Sections 5097.98 and 5097.99 of the Public Resources Code also call for "protection to Native American human burials and skeletal remains from vandalism and inadvertent destruction." To achieve this goal, construction personnel on the project shall be instructed as to both the

potential for discovery of cultural or human remains, and the need for proper and timely reporting of such finds, and the consequences of failure to do so.

Building 695. Also, a Dust Hog was located on the northeast corner of Building 655. Because the interior was not accessible, it is not known what permitted equipment remains inside.

U.S. Air Force storage bins were off-loaded to the paved area north of Building 660. The content of the storage bins was not readily apparent. No obvious evidence of a release of a hazardous substance or petroleum product was observed in this area.

Discolored water and a sheen were observed in the grated drain, which originated at Building 695 - Media Blast, on the northwest corner of the site. It was not readily apparent whether the water was adversely affected by a hazardous substance or petroleum product. A Pacific Gas & Electric Company gas line enters the site from the west side.

Hazardous Materials of McClellan Air Force Base. McClellan Air Force Base is a National Priority List (superfund) site. Contaminants on the site are mainly confined to groundwater contamination created at various industrial sites around McClellan due to the historical military, industrial, and aviation operations of the facility. Groundwater contaminants of concern are VOCs. Hazardous materials historically handled at the former McClellan AFB included industrial solvents, caustic cleaners, electroplating chemicals, heavy metals, fuels, oils, lubricants, paints, pesticides, and radioactive substances. The DOD has executed a Federal Facilities Agreement with the Environmental Protection Agency (EPA) in which the DOD affirms their responsibility to remediate the contamination. In addition, the DOD is responsible for the costs to clean the site and all liability associated with the contamination through the Economic Development Conveyance with the County of Sacramento. Therefore, the county and any successors are indemnified from any liability related to the existence of known or unknown contamination at the former base. There are no restrictions affecting the reuse of the facilities and no issues that pose an environmental risk.

Other Hazardous Materials. Off-site facilities have the potential to affect the project site (e.g., groundwater contamination plume, the Boiler Plant, and fuel storage area). Limited radioactive materials were found in a landfill at the former air base on the west side of the base airport. The proposed project site is located south of the airport and, based on information provided, radioactive materials have not been reported on site²².

Environmental Analysis

HM-1 Construction of the proposed bus maintenance facility could expose workers to contaminants in surface and subsurface areas within and adjacent to the project site. (PS)

Subsurface (e.g., potential soil and groundwater contaminants) and surface (e.g., past on-site building uses, waste containers and ASTs, AFB storage bins, ACMs, lead) hazardous materials are known to exist at the project site, and soil and groundwater contamination exists at the larger AFB. While groundwater is not likely to be encountered during development activities associated with the proposed bus maintenance facility, exposure to contaminated soils in the

²² Kleinfelder. *Preliminary Hazardous Materials Evaluation*. November 24, 2003. Page 6.

vicinity of the project site is possible. The primary contaminants are VOCs, polychlorinated biphenyls (PCBs), and heavy metals. Furthermore, hazardous waste containers found on site could also potentially be leaking contaminants into the ground and nearby drains. The existing PG&E gas pipeline could also potentially be leaking contaminants into the soil and groundwater.

During grading and excavation, demolition, and other construction activities, construction workers and members of the public could be at risk for exposure to contaminated soil and/or groundwater. Construction workers would be at the greatest risk of exposure, particularly if hazardous materials in the soil or groundwater are not adequately identified and proper precautions not implemented. Exposure to on-site environmental contamination could occur through dermal contact or inhalation and result in various short-term or long-term health effects specific to each chemical present if of sufficient concentration and duration. Acute effects, often resulting from a single exposure, could range from major to minor effects, such as nausea, vomiting, headache, or dizziness.

Site remediation itself could also have adverse health and safety impacts. If site remediation were conducted without appropriate safeguards, workers, and possibly the public, could potentially be exposed to chemical compounds in soils, soil gases (gases or vapors, mostly air, trapped within soil), or groundwater, or to airborne chemicals. Workers directly engaged in on-site activity would face the greatest potential for exposure. The public could be exposed to contaminants if access to the project site were insufficiently controlled.

Worker and public health/safety requirements would apply during remediation activities. Potential adverse impacts of remediation would be mitigated almost entirely by legally required safety and hazardous waste handling precautions. For hazardous waste workers, Cal/OSHA regulations mandate an initial 40-hour training course and subsequent annual training review. Additionally, site-specific training would be required for some workers. These measures, along with application of cleanup standards subject to review by responsible agencies, would serve to protect human health and the environment during site remediation, thus minimizing impacts. Nevertheless, unless these plans are adequately prepared and implemented, the project could pose a significant impact by creating a substantial human health hazard or involving the disposal of materials in a manner that poses substantial hazards to people or to animal or plant populations.

MITIGATION MEASURE. The following mitigation measures would reduce impacts from exposure to hazardous materials to a less-than-significant level. (LTS)

HM-1.1 Prepare Site Health and Safety Plan. In the event that contaminated soil or groundwater is encountered, RT shall comply with the *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities* regulatory requirements for hazardous materials/waste health and safety plans. The *Site Health and Safety Plan* shall establish policies and procedures to protect workers and the public from potential hazards posed by residual contamination issues at the

site. The Plan shall include items applicable to site conditions, such as identification of contaminants, potential hazards, material handling procedures, dust suppression measures, personal protection clothing and devices, controlled access to the site, health and safety training requirements, monitoring equipment used during construction to verify health and safety of workers and the public, measures to protect public health and safety, and emergency response procedures. If contamination were present in the soil and/or groundwater proposed for the use of backfill or disposal, the handling and disposal of the contaminated soil and groundwater would be governed by the applicable local and federal hazardous materials regulations.

HM-1.2 Require an on-site Industrial Hygienist to be Present during Construction. An industrial hygienist or other qualified professional (i.e., registered geologist, professional engineer or other scientist qualified to identify and sample soil and/or groundwater) shall be present at the project site during construction of the proposed bus maintenance facility. During excavation activities, the industrial hygienist shall take air samples to measure the level of VOCs present. If the level of VOCs collected is above the allowable state and federal standards, construction shall be stopped until further evaluation of the level of contamination can be characterized and appropriate remediation measures can be implemented.

HM-2 Construction, demolition, and remodeling of structures at the project site could expose workers to asbestos containing materials and lead-based paints. (PS)

Project construction would include the demolition and removal of two existing buildings constructed prior to 1960. As indicated in the 1995 asbestos survey of the AFB, 205 buildings with some form of ACM exist at McClellan Park and could include the buildings on the project site. Additionally, the *Base Reuse Plan* assumed that lead-based paint might be present in buildings constructed prior to 1978, such as those existing on the project site.

If any unidentified ACM and/or lead-based paint were to remain in existing facilities when demolition or renovation occurs, these hazardous materials could create worker health hazards, result in releases that could present a risk to current or future occupants or visitors on or off the project site, and/or result in inappropriate waste disposal. This is considered a potentially significant impact.

To reduce potential hazards to individuals who would be performing demolition or renovation work and individuals outside the work areas who could be exposed to potential releases of hazardous substances via airborne releases or spills, State regulations require that buildings be tested for the presence of asbestos and lead-based paints, and removal and disposal procedures must also be implemented in accordance with adopted regulations. During abatement activities, on-site controls would be in place to ensure ACM and lead-based paint is removed, packaged,

and transported off-site for disposal in a manner that minimizes the potential for airborne releases that could affect adjacent uses, within the project area and its vicinity.

MITIGATION MEASURE. Implementation of the following mitigation measure would reduce potential impacts resulting from the release of hazards related to ACMs and/or lead-based paint to a less-than-significant level.

HM-2.1 Identify Structures with ACMs and Lead-Based Paints Prior to Constructing the Bus Maintenance Facility. RT shall conduct comprehensive surveys for hazardous materials that may be present in building components, including but not limited to, flooring, roofing, and piping insulation in the steam tunnels and crawl spaces. Potential hazardous materials that shall be identified shall include, but would not be limited to, asbestos, lead-based paint, PCBs, mercury, and other substances that a qualified professional deems necessary. The results of the assessment shall be used to determine appropriate abatement procedures, including on-site controls, packaging, transport, disposal, and reporting, that shall follow all established State (e.g., Department of Toxic Substances Control, Occupational Safety and Health Administration) and local (SMAPCD) standards.

HM-3 The proposed bus maintenance facility's routine operations could potentially create a public health hazard, but RT's standard operating procedures, in compliance with federal, state, and local regulations governing use, handling, and disposal of hazardous materials would reduce the impact to less than significant. (LTS)

Currently, the existing Midtown Maintenance Facility produced (year to date) 3.77 tons of aqueous solvents (parts cleaners), 5.8 tons of oily solids (kitty litter), 51 tons of oily water (steam pit and wash rack), 9.53 tons of used antifreeze, 0.87 tons of crushed filters, 30.43 tons of waste oil, and 0.3 tons of fluorescent tubes for a fleet of approximately 250 buses. The proposed maintenance facility would initially service approximately 100 buses, and would eventually service up to 250 buses. Similar day-to-day operations such as bus washing and refueling, equipment cleaning, and deposition of fuel oils, and potential accidental spills of hazardous materials could adversely affect the health and safety of individuals working at the facility and other adjacent land uses. However, hazardous wastes resulting from day-to-day operations would not exceed existing volumes and would be disposed of properly in compliance with federal, state, and local regulations, similar to the procedures that RT already follows at the Midtown Maintenance Facility. Therefore, there would not be a significant impact resulting in a public health hazard as a result of RT's routine operations at the new bus maintenance facility.

McCLELLAN BUSINESS PARK INITIAL PARCEL #3 RESTORATION PROJECT

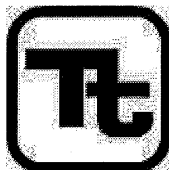
FINAL REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN May 2013

Prepared For:



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EXECUTIVE SUMMARY

Tetra Tech, Inc. (Tetra Tech) has been contracted by McClellan Business Park, LLC (MBP) to provide project management and technical environmental services in support of the McClellan Business Park Initial Parcel (IP) #3 Restoration Project, hereinafter referred to as "Project," at the former McClellan Air Force Base (AFB), in McClellan, California. MBP, the U.S. Environmental Protection Agency (EPA), the Department of Toxic Substance Control (DTSC), and the California Central Valley Regional Water Quality Control Board (Central Valley Water Board) entered into the agreement: Administrative Order on Consent (AoC) for Remedial Investigation/Feasibility Study (RI/FS) and Remedial Design/Remedial Action (RD/RA) for Cleanup of Portions of the Former McClellan AFB. Paragraphs 28 and 29 of the AoC, and Task 4 of the AoC Statement of Work (SOW), require that MBP provide a RD/RA Work Plan to the EPA for review and approval, in consultation with the DTSC and Central Valley Water Board. Collectively, these federal and state agencies providing Project oversight will hereinafter be referred to as "Regulatory Agencies."

The RD/RA Work Plan describes the actions and procedures to be followed to perform the field work required to implement remedies selected in the Local Reuse Authority IP#3 Record of Decision (ROD; EPA 2012). For IP #3 sites, the remedy that requires field work is excavation and off-site disposal for removal of contamination above cleanup goals. The plan to implement excavation and off-site disposal is therefore the subject of this RD/RA Work Plan. Other remedies selected in the IP#3 ROD require implementation of institutional controls (ICs). ICs do not require field work. ICs are non-engineered instruments, such as administrative and or legal controls, that help to minimize the potential for human exposure to contamination. Implementation of ICs is addressed by the IP#3 Institutional Controls Implementation and Assurance Plan (ICIAP).

SUMMARY OF PLANNED ACTIVITIES

The IP #3 ROD has selected excavation and off-site disposal and the vapor intrusion remedy to address contamination that poses or may pose an unacceptable risk based on the future land use scenarios at 41 Installation and Restoration Program (IRP) sites. These IRP sites are known as Building 600, Confirmed Site (CS) 023, CS 030, CS 036, CS 047, CS 048, CS T-061, Operable Unit (OU) B1 Drainage Ditch, Potential Release Location (PRL) 060, PRL L-005 B, D, F, and G, PRL L-005C, PRL L006-A-B, PRL P-009, PRL S-005, PRL S-012, PRL S-013, PRL S-028, PRL S-029, PRL S-030, PRL S-034, PRL S-035, PRL T-006, PRL T-007, PRL T-060, Study Area (SA 001), SA 002, SA 005, SA 007, SA 011, SA 014, SA 018, SA 088, SA 090, SA 092, SA 095, Special Study Area (SSA) 002, and Wastepile.

Remediation field work will consist of excavating the excavation target areas of CS 047, CS T-061, OU B1 Drainage Ditch, PRL L-005C (which surrounds PRL S-030), PRL P-009, PRL S-012, PRL S-013, PRL T-060/Study Area SA 005, SA 007, SA 011, SA 014, SA 092, and Wastepile (Attachment 10). The IP #3 ROD estimated the volume of soil requiring excavation at approximately 100 cubic yards from CS 047, 200 cubic yards from CS T-061, 60 cubic yards from OU B1 Drainage Ditch, 860 cubic yards from PRL L-005C (which includes PRL S-030), 100 cubic yards from PRL P-009, 2,810 cubic yards from PRL S-012, 1,400 cubic yards from PRL S-013, 230 cubic yards from PRL T-060/SA 005, 890 cubic yards from SA 007, 2,050 cubic yards from SA 011, 2,010 cubic yards from SA 014, 550 cubic yards from SA 092, and 200 cubic yards from Wastepile. Unless direct-loaded for immediate disposal at an EPA-approved waste management facility, the excavated soil will be placed in accumulation areas on the Project Sites for analysis and disposition evaluation. Sampling of the excavations and stockpiles will be conducted to ensure the contamination in excess of cleanup levels has been fully delineated and removed. If post-excavation sampling demonstrates that the full extent of contamination has not been captured and removed, the excavations will be extended as needed, to a depth not to exceed 15 feet below ground

TETRA TECH, INC.

surface (bgs), to remove the contamination. If an excavation floor or sidewall is extended, post-excavation sampling will be conducted for the expanded floor or sidewall. Upon receipt of confirmation that the soil exceeding cleanup levels has been adequately removed, contaminated soil that exceeds the cleanup levels set forth in the IP #3 ROD will be disposed at an EPA-approved waste management facility, the excavation areas will be filled either with excavated soil suitable for reuse or imported backfill, and the excavation areas will be restored to their pre-excavation landscaping.

Once the remedial action has been completed, a Remedial Design Completion Plan (RDCP) will be prepared and submitted to the Regulatory Agencies. ICs in the form of deed restrictions and land use controls will be maintained according to the ICIAP at IRP sites where contaminants remain below industrial use levels, but above levels allowing for residential use.

PROJECT OBJECTIVES

The objectives of the Project are as follows.

1. Safely remove and properly manage contaminated soil and/or debris during remedial activities;
2. Dispose contaminated soil and Construction Derived Waste (CDW) at an EPA-approved waste management facility;
3. Backfill and compact the excavated areas with soil below Project cleanup levels; and
4. Receive Regulatory Agencies approval of RDCP for the Project Sites.

To meet the first three objectives, a Site-Specific Health and Safety Plan (SSHASP), Construction-Derived Waste Management Plan (CDWMP), and Sampling and Analysis Plan (SAP; Attachment 1, Attachment 5, and Attachment 7 of this RD/RA Work Plan, respectively) have been developed to ensure the safe removal and proper management of contaminated soil and CDW during remedial activities at the Project Sites. The SAP, in conjunction with the *McClellan Park Soils Management Manual (SMM) for Transfer Parcels* (Tetra Tech 2008, latest version, March 2010), establish the sampling criteria for determining when soil requires excavation and disposal. The management of excavated soils is addressed in the CDWMP and the Transportation Plan (Attachment 6).

To meet the fourth objective, the ROD establishes the cleanup levels for the Project Sites. When those levels are met, Regulatory Agencies may make determinations of No Further Remedial Action for the relevant site(s).

REMEDIAL ACTION OBJECTIVES AND CLEANUP LEVELS

The primary Remedial Action Objectives (RAOs) for this Project are to:

- Eliminate or reduce direct contact, inhalation or ingestion exposures to humans that are the result of contaminated soil and soil gas from the surface to 15 feet bgs by meeting the cleanup levels;
- Prevent migration of contaminated soil to protect surface water quality; and
- Prevent exposure to residual contamination by limits on land use.

To achieve the RAOs, the soil with concentrations greater than cleanup levels will be excavated and disposed per this RD/RA Work Plan. The cleanup levels based on the protection of human health for the Project Sites are equivalent to the lesser of the carcinogenic risk of 10^{-6} or an HQ of 1 for each contaminant for exposure to soil through direct contact, inhalation, and ingestion. Several of the cleanup levels are based on the protection of surface water or groundwater quality. Therefore, removing the soil with contaminant concentrations exceeding cleanup levels will achieve the RAOs.

REMEDIAL ACTION IMPLEMENTATION

Upon approval of the RD/RA Work Plan, several pre-construction activities will be initiated in preparation for the remedial action. These pre-construction activities include surveys, permitting, initial community involvement/notification, securing access, pre-mobilization conference, and subcontracting. Surveys will be performed before and during excavation activities to identify utility locations, sampling locations, cut and fill areas, and to develop as-built drawings. The planned activities at the Project Sites will be coordinated through MBP, and permits and authorizations will be obtained at this stage. The appropriate equipment, supplies, and subcontractors will also be acquired. Once all these pre-construction activities are completed, a pre-mobilization conference will be conducted with the key field staff, MBP, County, and Regulatory Agencies to review the scope of the planned activities and the field work schedule.

Under MBP's directive, Tetra Tech will mobilize equipment and field crew to the Project Sites in preparation for the soil removal activities, in accordance with the requirements of this RD/RA Work Plan. Tetra Tech will set up areas for construction support, soil staging, and decontamination operations. To control access to Project Sites—and for safety reasons—fencing will be erected and removed where necessary. This RD/RA Work Plan includes a Storm Water Pollution Prevention Plan ([SWPPP] Attachment 4) that identifies measures and controls to be implemented at the Project Sites to minimize potential impacts from the remedial operations on storm water discharges. The Project staff will implement best management practices, in accordance with the SWPPP, to control sediment erosion. Once all these activities are complete, the Project Sites will be ready for excavation.

Earthwork will consist of a field survey to establish a grade-staking cut for excavation of contaminated soil, and staging of soil by expected classification. Excavation will be conducted in a manner that minimizes the waste volume. The excavation will be planned and conducted with the goal of capturing the soil that exceeds cleanup levels by targeting locations that data show to exceed cleanup levels. Excavated soil will be classified and segregated based on sample results from previous investigations, and visual and/or olfactory evidence of contamination, if present. Soil which is known to exceed cleanup levels shall be considered to be located within a Class 1 survey unit area. Soil in which COCs are not expected to exceed cleanup levels, but is present above background and/or laboratory detection limits shall be considered to be located within a Class 2 survey unit area. Soil with a low probability of contamination exceeding background and/or laboratory detection limits shall be considered to be located within a Class 3 survey unit area (SAP Attachment 1). The survey unit classifications are determined through an assessment of sample data from previous investigations. Additionally, locations discovered with soil having visual or olfactory evidence of contamination will be re-designated as a Class 1 area if not already established as such. The possible range of survey unit sizes vary based on these classifications. All excavation areas are considered Class 1 areas for the purpose of establishing survey units. Excavated soil will be segregated by EPA-approved waste management facility classification and separated into stockpiles and/or containers in a designated soil accumulation area. To further minimize the potential waste volume, excavated soil may be managed to remove rocks and construction-derived waste prior to, or after, placement in stockpiles and/or containers. The stockpiles and/or containers will be sampled as required in the SAP (Attachment 7). The excavated soils will then either be transported to

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an EPA-approved waste management facility for disposal in accordance with the CDWMP (Attachment 5) and Transportation Plan (Attachment 6), or used as backfill in the excavation from which the soil originated, if sampling demonstrates that the soil is suitable for backfill.

After the contaminated soil has been removed as confirmed by post-excavation sampling, the excavated areas will be backfilled with soil suitable for backfill and restored to the pre-construction condition. Once Project Site restoration is completed, all equipment and personnel will be demobilized from the Project Sites. The remedial action implementation—including as-built drawings, field sampling results, and waste disposal documentation—will be included in the RDCP.

If, during the implementation of the IP#3 remedial activities, MBP finds contamination exceeding the cleanup levels deeper than 15 feet below ground surface (which is defined as a "Retained Condition" in the 2009 AOC), the AOC recognizes the Environmental Services Cooperative Agreement (ESCA) process in which MBP (on behalf of the County of Sacramento) consults with the AF on how to address the Retained Condition (AFRPA 2009c). Pursuant to the ESCA and as recognized in the AOC, one alternative is that the AF (with the approval of EPA, MBP and the County of Sacramento) may choose to treat the Retained Condition as an "Added Condition" under the AOC, in which case the AOC shall govern the response action to be implemented by MBP and the funding for such action shall be paid by the AF through the ESCA. To the extent necessary due to the scope of the discovered Retained Condition, the Air Force retains the responsibility for addressing any remedial change in accordance with 40 CFR [Code of Federal Regulations] 300.435(c)." (ROD; EPA 2012)

1.3.5 Surface Features, Source/Potential Sources of Contamination, and Rationale for Selected Remedies for PRL P-009

PRL P-009 consists of a shallow unlined drainage ditch in the northern portion of Investigation Cluster 7 in OU B (Figure 1-7). The shallow unlined drainage ditch source/potential sources of contamination are contaminants from locations such as IWTP No. 4, Building 654, and Building 699, which may have collected and migrated into the subsurface, and pose the potential for infiltration of contaminants in runoff/wastewater. Alternatives VOC3 and Non-VOC4a were selected to address the VOCs in SSG and PCBs and metals in soil that exceed the industrial use cleanup levels. An industrial use target volume of 100 cubic yards was estimated for removal to address concentrations of contaminants in soil that exceed the industrial use cleanup levels for protection of human health. A second target volume, of 2,800 cubic yards of soil, was estimated to evaluate cleanup to unrestricted use. This target volume includes all areas where concentrations of contaminants in soil exceed unrestricted use cleanup levels and cleanup levels for protection of surface water. Surface water from PRL P-009 discharges to SA 014. A sediment trap/media filter will be installed at SA 014. The costs for this sediment trap/media filter are associated with SA 014. Monitoring of the sediment trap/media filter will be required to evaluate potential threats to surface water quality in future five-year reviews. Because the site will be industrial and potential surface water impacts will be addressed by the installation of a sediment trap/media filter and will receive long-term monitoring, the smaller target volume was selected for the Non-VOC4a remedy. If new construction is built on the site, the property owner must sample or maintain a surface cover or other engineered controls, as warranted. The selected alternatives result in restricted land use with ICs (deed restrictions and SLUC) prohibiting residential and other use restrictions.

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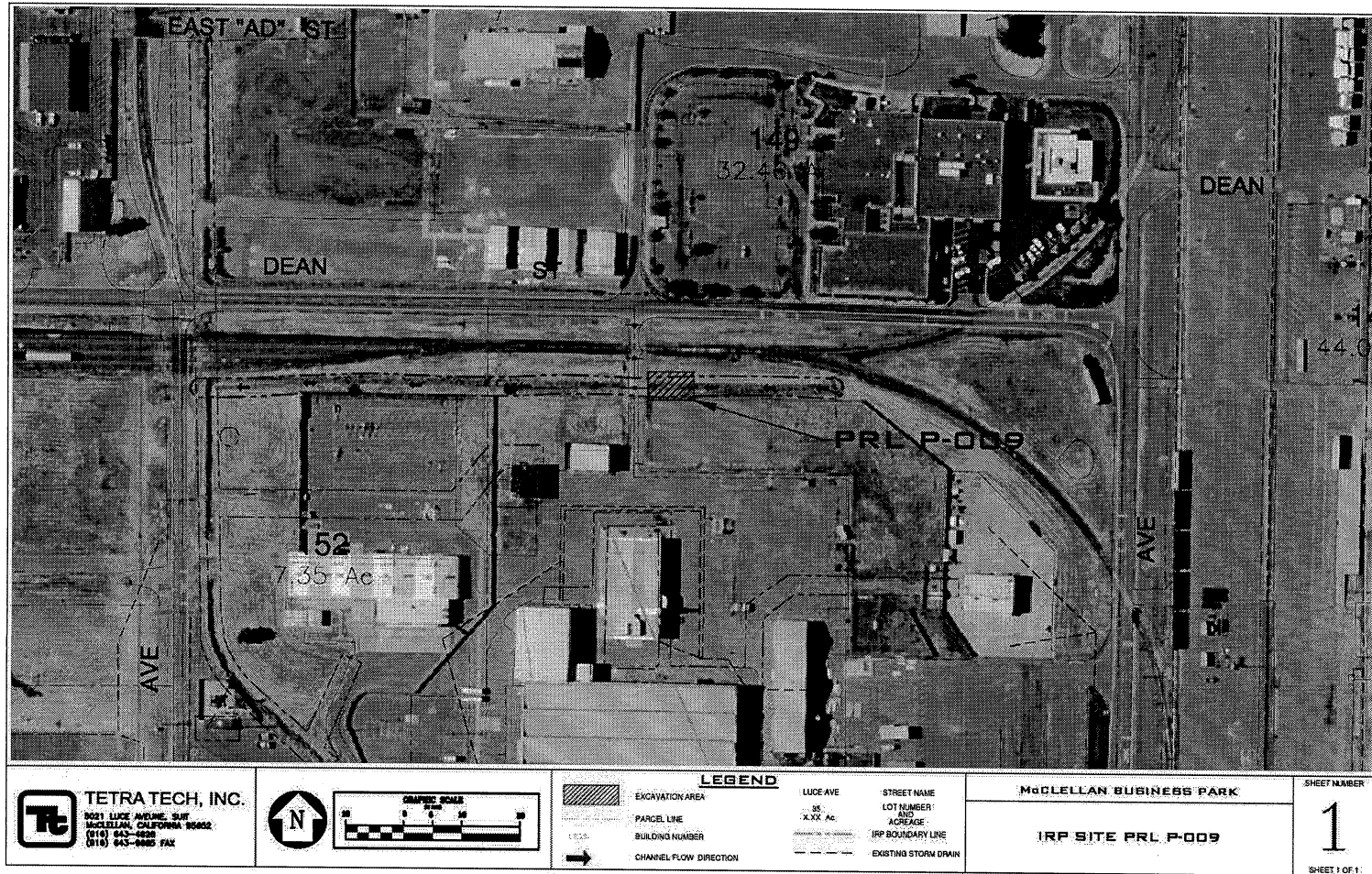


Figure 1-7 PRL P-009 Site Map

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