

ADDENDUM
to the
Initial Study and Mitigated Negative Declaration
Southern California Edison
Alhambra Warehouse Project
SCH# 2020039065

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1.0 INTRODUCTION

1.1 Overview

On June 15, 2020, the City of Alhambra (City) adopted the *Southern California Edison Alhambra Warehouse Project Initial Study Mitigated Negative Declaration* (IPD-19-01 and CU-19-01), State Clearinghouse # 2020039065 (City of Alhambra 2020) also referred herein as the “IS/MND” which analyzed the potential environmental impacts associated with consolidating storage materials and associated staff from Buildings C, D, and E, at the Southern California Edison (SCE) Alhambra Combined Facility (Facility) into a proposed new warehouse (Project). The project site is located at 501 South Marengo Avenue, Alhambra, CA (Assessor Parcel Numbers 5342-029-800 and -801). The approved project involves demolition of approximately 3.3 acres of asphalt and concrete ground cover and construction of a new approximately 54,000 square foot (SF) warehouse on current yard space in the southwestern corner of the existing Facility. A new site access gate will also be constructed at the intersection of South Raymond Avenue and Chestnut Street. Refer to Section 2.1 for a more detailed description of the Project background.

Subsequent to the City’s approval of the IS/MND in preparation for the Project’s warehouse construction, the California Department of Toxic Substances Control (DTSC), pursuant to authority granted under Section 25398.2(b) of the Health and Safety Code, required preparation of a focused Removal Action Workplan (RAW) (Northgate Environmental Management, Inc. 2023) because of the presence of known soil contamination onsite. The RAW was developed in response to SCE’s proposed removal of contaminated soil prior to the planned over-excavation and decompaction of soil in the southwest portion of the Facility for construction of the warehouse as part of the approved Project. The RAW identifies excavation and offsite disposal of approximately 960 cubic yards (CY) of contaminated soils that need to be properly removed and disposed of prior to construction of the new warehouse at the Facility. Implementation of the RAW is expected to take approximately 1 to 2 months.

Because the RAW had not been developed at the time of the City’s adoption of the IS/MND, the activities and recommendations described in the RAW will be considered a modification to the approved Project within the proposed warehouse construction area of the Facility. These modified actions include additional sampling to delineate contaminated soil and removal of the contaminated soil within the warehouse construction area. Therefore, this Addendum is necessary to address the potential environmental effects of the modified activities relative to the previously approved Project. See Section 2.2 for further details of these modification to the Project.

1.2 Purpose of Addendum

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

addendum with the final EIR or adopted negative declaration prior to making a decision on the project, as modified.

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

1. Substantial changes are proposed in the project that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Addendum will show that the modifications or additions to the approved Project that were not evaluated in the prior IS/MND are necessary per the RAW requirements but none of the conditions requiring the preparation of a subsequent negative declaration are applicable.

1.3 Scope and Content of Addendum

This Addendum has been prepared in accordance with the requirements of CEQA (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (Title 14 California Code of Regulations Section 15000 et seq.). This Addendum considers each of the environmental impacts that were analyzed in the previously adopted SCE Alhambra Warehouse Project IS/MND (City of Alhambra 2020) and focuses on determining whether the modified Project would result in an increase in the severity of the impacts identified in the adopted IS/MND or would result in any new impacts not previously considered in that

document. The criteria for determining the significance of environmental impacts in this Addendum analysis are the same as those contained within the previous IS/MND for the 20 environmental topics analyzed. Based on excavations depths considered in the approved Project, it is likely that excavation and material disposal proposed under the modified activities was accounted for in the analysis of the IS/MND; however, to be conservative this Addendum analyzes the 960 CY of soil removal to be independent of, and in addition to, the previously considered actions.

2.0 PROJECT BACKGROUND AND PROPOSED MODIFICATION

2.1 Project Background

The project evaluated in the SCE Alhambra Warehouse Project IS/MND at the Facility would serve to consolidate storage materials and associated staff from Buildings C, D, and E into a proposed new warehouse that would better optimize the function and operation of the aged campus, which was built in the 1930s. The Project would consolidate all indoor storage (11,000 SF from Building C, 27,000 SF from Building D, and 17,300 SF from Building E) and develop a centralized logistics intake, yard consolidation, parking restriping, and physical on-site distribution point to handle all indoor storage for Transmission and IT functions. The Project's demolition and construction activities would occur in two phases over approximately 12 months. Demolition activities would include removal of approximately 3.3 acres of existing asphalt and concrete, associated utilities, and two non-native trees to prepare the site for the proposed warehouse and new gate. Construction would include the new gate, warehouse structure, underground stormwater treatment basins, landscaping, surface parking restriping, and associated utilities and connections. The new warehouse would be approximately 40 feet in height and built to accommodate approximately 11,045 SF of office space and 42,655 SF of warehouse space. The analysis assumed approximately 3,873 CY of material would be exported from the site and to be excavated at depths of 5 to 8 feet below ground surface (bgs).

The IS/MND described that disposal of site materials would occur off-site in a proper disposal facility. The analysis noted that total petroleum hydrocarbon (TPH)-contaminated soil has been identified at the SCE Alhambra Campus and has been discarded at three landfills within the County of Los Angeles and that during construction of the Project, TPH-impacted soil would also be disposed of at these facilities as appropriate.

2.2 Modified Project Activities

Since the adoption of the IS/MND, the Project has advanced in planning and design and there are now more details of the site conditions that require specific actions for the identification and safe removal of contaminated materials onsite. Based on the known contaminants of the site and construction requirements, the RAW was developed in response to comments made by the DTSC in May 2023 regarding SCE's proposed removal of contaminated soil prior to the planned over-excavation and recompaction of soil in the southwest portion of the Facility for construction of the proposed warehouse. This RAW is only for soil removal activities associated with the construction of the warehouse, within the Proposed Warehouse Disturbance Area. While the requirements specified within the RAW generally fall within the overall scope of work analyzed in the IS/MND for the Project, some of the actions vary slightly from what was anticipated at the time of the preparation of the IS/MND, such as soil vapor sampling to depths of 15 feet, over-excavation of impacted soils to lower depths, and increased volume of material that would require offsite disposal. These actions associated with the RAW that are modified from those analyzed in the IS/MND (modified Project) are summarized below with full details available in the RAW.

Future construction of the warehouse would involve the over-excavation and recompaction of the top 2 to 9 feet of soil in the vicinity of the proposed warehouse, with deeper (up to 13 feet) localized excavations for building footings, utilities, and support columns, as shown in the RAW. The goal of the proposed modified activities (i.e., soil sampling, soil excavation, soil disposal) is to remove soil that contains containments of concern (COC) at concentrations above the removal action goals from areas where future excavation is planned for the construction of the proposed warehouse. Excavating and removing this soil prior to construction activities would minimize construction worker contact, spreading of the soil to other areas of the site, and potential mismanagement of the soil. Soil that contains COC concentrations above the removal action goals but is not within any planned construction excavation area would remain undisturbed in situ and would be addressed by a focused health risk evaluation to be conducted following the soil removal action. In addition, a quantitative human health risk assessment would be conducted after construction is completed for the entire Area of Concern 1 (AOC-1), which includes the warehouse and the data center.

The following is a summary of the proposed interim soil testing and removal actions that are included in the focused RAW and are considered in the analysis for this Addendum. Details regarding execution of all proposed actions can be found in the RAW.

- **Pre-Construction Soils Sampling:** Pre-excavation confirmation sampling is proposed for soils with COCs above removal action goals (and above the ambient screening level for arsenic) for locations within the planned warehouse construction excavation area to delineate impacted soils (see Figures 1a and 1b). The proposed sampling is based on the goal of better defining the extent of soil that exceeds screening levels within the planned construction excavation areas, and hence, the areas for soil removal prior to construction activities. Approximately 69 proposed sampling locations are anticipated to delineate the proposed 16 soil removal areas, with samplings depths ranging from 0.5 feet to 6 feet bgs.
- **Soil Vapor Sampling:** Soil vapor sampling is proposed to provide additional data in support of evaluating potential vapor mitigation measures during warehouse construction. The RAW proposes 19 additional soil vapor samples from 12 sampling locations for volatile organic compounds (VOCs) and TPH analysis. Samples would be collected at five locations within the proposed warehouse footprint at a depth of 10 feet bgs, and at seven locations outside of the building footprint but within the Proposed Warehouse Area at depths of 5 feet and 15 feet bgs. Locations within the building footprint would not be sampled at 5 feet bgs because all soil within the building footprint will be over-excavated to a minimum depth of 6 to 9 feet bgs.
- **Soil Removal and Off-Site Disposal:** The excavation conducted in 16 separate areas would result in approximately 960 CY of soil removed for disposal, with approximately 31 CY of waste estimated to be classified as non-Resource Conservation and Recovery Act (RCRA) hazardous, and the remaining 929 CY are anticipated to be classified as non-hazardous waste. Based on the known contaminants under this RAW, there are two anticipated separate waste streams for off-site

disposal¹: (1) hazardous waste would be transported to a permitted hazardous waste facility; and (2) non-hazardous waste would be transported to the nearest accessible waste disposal site. These volumes are subject to change based on sampling results.

Based on the previous soil sampling results, excavation layout and proposed pre-excavation soil sampling locations discussed above and detailed in the RAW, approximately 16 soil removal areas are anticipated, with depths ranging from 1.5 feet to 4 feet bgs. The anticipated depth and volume of each soil removal area is summarized in Table 1. The anticipated total volume of soil to be excavated and removed from the site is approximately 960 CY ex-situ including a 25% swell factor of in-situ soil and including materials removed in association with soil vapor sampling.

Table 1. Soil Removal Excavation Areas and Anticipated Volumes*

Excavation Area	Previous Sample Location(s) with Exceedance	Anticipated Soil Removal Depth (feet bgs)	Area (SF)	In-situ Volume (CY)	In-situ Volume (CY) Silty Sand, Swell Factor of 25%
1	IT-4	2	400	29.6	37.0
2	IT-7	2	400	29.6	37.0
3	IT-10	3	400	44.4	55.5
4	IT-11	4	400	59.3	74.1
5	IT-16	1.5	400	22.2	27.8
6	IT-18	3.5	400	51.9	64.8
7	IT-22	2	400	29.6	37.0
8	IT-23, SB-6	3	660	73.3	91.7
9	IT-122, IT-79	4***	1,150	114.8	143.5
10	J-200	2	440	32.6	40.7
11	IT-137A	2	400	29.6	37.0
12	K-400, IT-100, IT-101	4	750	111.1	138.9
13	WQI Sample HA-8**	2.5	400	37.0	46.3
14	WCI Samples: HA16, HA17, HA18, HA19, HA20, HA25, HA27, HA28, HA29, HA30	2.5	270	25.0	31.3
15	WCI Sample HA10**	2.5	400	37.0	46.3
16	WCI Sample HA13**	2.5	400	37.0	46.3

Source: RAW (Northgate Environmental Management, Inc. 2023), Table 7

*Volumes are subject to change based on soil sampling results.

** = Samples depths are shown in feet below the top of soil, beneath the surficial asphalt and base material.

*** = *** = The anticipated depth of soil removal around IT-122 is likely 2 feet and the anticipated depth of soil removal around IT-79 is likely 4 feet based on existing data.

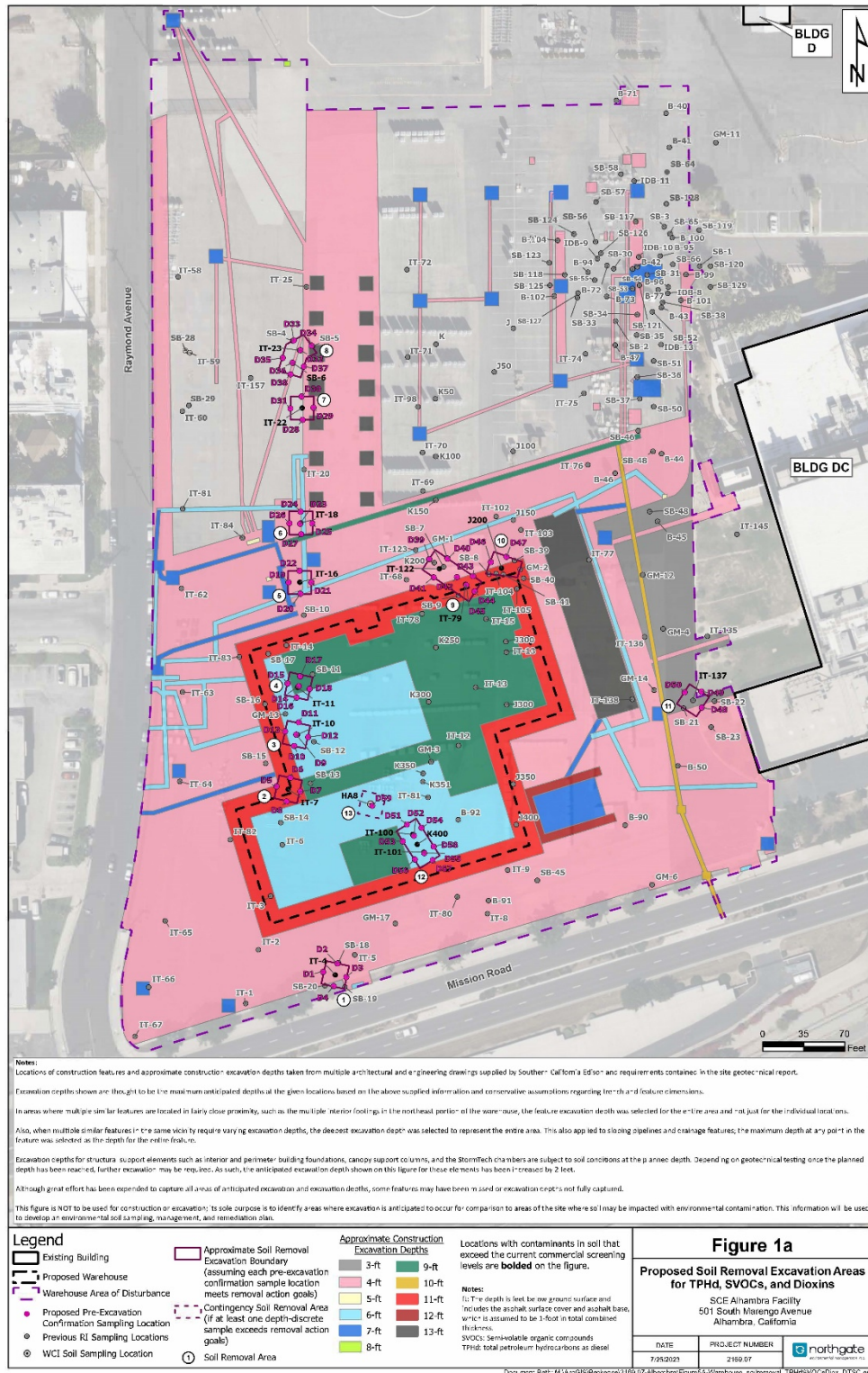
bgs = below ground surface

CY = cubic yards

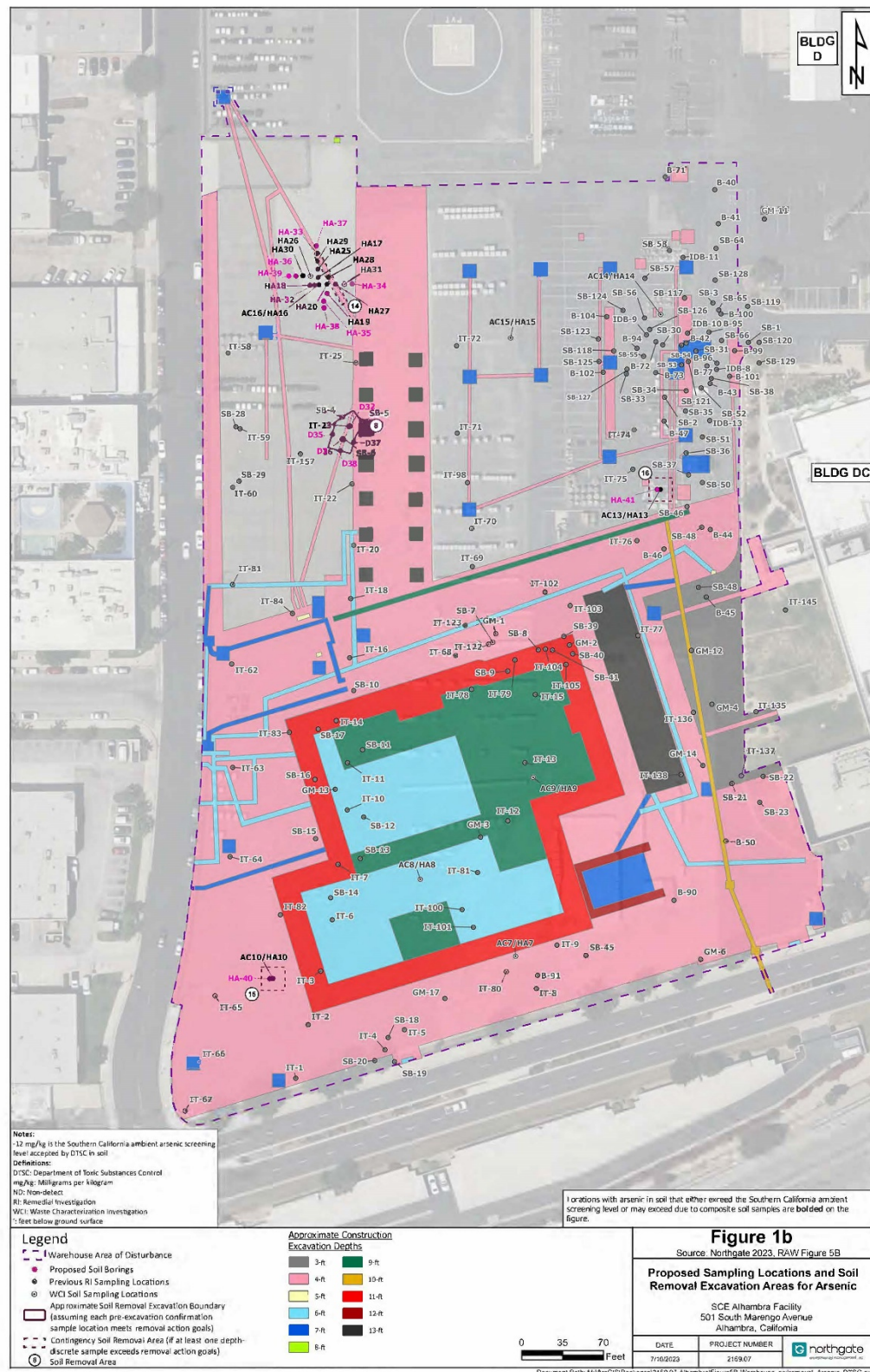
SF = square feet

¹ This RAW does not include the volume associated with PCB-impacted soil since that is covered in a separate plan under U.S. Environmental Protection Agency (USEPA). PCB results have been reported to USEPA and they are providing oversight for additional PCB sampling and cleanup. Therefore, removal of PCB soil is not included in this RAW.

Figure 1a. Proposed Sampling Locations and Soil Removal Excavation Areas for TPH-d, SOVCs, and Dioxins



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3.0 ENVIRONMENTAL REVIEW

3.1 Introduction

The proposed modifications to the approved Project involve the implementation of the RAW, which includes additional testing and the removal of contaminated soil that exceeds the commercial regulatory screening levels to minimize human or environmental exposure to arsenic, semi-volatile organic compounds (SVOCs), dioxins, polychlorinated biphenyls (PCBs), and total petroleum hydrocarbons (TPH). Regulation of the PCB removal is being administered by U.S. EPA. Refer to Section 2 for detailed modified activity descriptions.

The prior IS/MND was adopted in June 2020 by the City. While the proposed modifications to the approved Project would result in increased testing and excavation of soils from the site, there are no substantial changes in circumstances that have occurred since the prior IS/MND was prepared and no new information of substantial importance has become available since that time. Based on excavations depths considered in the approved Project, it is likely that excavation and material disposal proposed under the modified activities was accounted for in the analysis of the IS/MND; however, to be conservative this Addendum analyzes the 960 CY of soil removal to be independent of, and in addition to, the previously considered actions.

The following sections include a summary of each of the environmental impact topics evaluated in the IS/MND and a determination as to whether the modified activities would result in an increase in the severity of the impacts identified in the prior IS/MND or result in any new impacts not previously considered in the prior IS/MND. Information in this section is sourced from the adopted IS/MND (City of Alhambra 2020).

3.2 Environmental Analyses

3.2.1 Aesthetics

The prior IS/MND indicated that the approved Project would result in no visual impacts because there are no officially designated scenic vistas in the immediate Project vicinity. The site is not considered a scenic vista as it is bordered by an urban setting, including existing transportation and mostly industrial land uses, and does not possess any highly valued scenic resources. Additionally, the Project site does not contain any rock outcroppings or historic buildings visible from a state scenic highway. There are no scenic highways within the City. The IS/MND indicated that Project does involve removal of two trees within the industrial campus; however, it was determined that these trees do not contribute to or are no part of a scenic resource. It was also determined in the IS/MND, that the Project site is zoned for industrial use and the Project features would be constructed with applicable industrial design guideline; thus, the approved Project would be in compliance with applicable Commercial developments General Plan policies LU-2a through LU-2E. The IS/MND determined that new lighting from the Project would not create substantial light or glare that would adversely affect day or nighttime views.

The sampling and soil removal activities as part of the modified activities would not have the potential to result in any long-term degradation of the Facility's visual character or quality as they are interim steps in the construction process that would impact areas already included within the Project footprint and would not impact the final visual context of the Project. In addition, the modified activities would not include any new lighting beyond what was evaluated in the prior IS/MND or exacerbate the conditions that led to the initial determination.

Conclusion: *The modified activities would not result in any additional significant adverse aesthetic impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.2.2 Agricultural and Forestry Resources

As indicated in the IS/MND, no significant impacts related to agricultural resources would occur as a result of Project implementation. The Project site does not include land identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. It was also determined that there are no existing agricultural or forestry resources on the Project site or lands under a Williamson Act Contract per the Department of Conservation. There are no lands in agricultural use in the Project vicinity that could be directly or indirectly converted to non-agricultural uses as a result of Project implementation.

The modified activities would occur in the same footprint as the approved Project and would not create conditions that could affect agricultural or forestry resources.

Conclusion: *The modified activities would not result in any additional significant adverse agricultural or forestry impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.2.3 Air Quality

Emissions Generation

As indicated in the prior IS/MND, air quality impacts related to conflicts with applicable air quality plans, cumulatively considerable net increase of criteria pollutants, exposure to pollutant concentrations, and odors were found to be less than significant with no mitigation measures required. Construction activities for the approved Project would generate temporary emissions of precursors to ozone (VOCs), oxides of nitrogen (NOX), carbon monoxide (CO), particulate matter (PM₁₀, and PM_{2.5}). VOCs, NOX, and CO emissions are associated primarily with mobile equipment exhaust, including off-road construction equipment and on-road motor vehicles. Fugitive PM emissions are associated primarily with site preparation and travel on unpaved roads. The IS/MND analysis included emission modeling for demolition and construction of the approved Project. Construction emissions were estimated for worker commutes, haul trucks, and the use of off-road equipment and the analysis assumed approximately 3,873 CY of material would be exported from the site. The modeling showed that peak daily construction emissions would not approach or exceed any of the South Coast Air Quality Management District (SCAQMD) daily or local significance thresholds. The Project would also be required to comply with SCAQMD Rule 403 Best Available Control Measures (BACM), which would further reduce fugitive dust emissions during construction activities.

The modified activities proposed by the RAW would generate similar air emissions as a result of equipment use onsite and haul trips required to dispose of soil. Modified activities would be short-term, approximately 1 to 2 months. The modified activities would be very similar to the construction activities modeled for the approved Project, which also included heavy earth moving equipment and haul trips. The 960 CY of soil that would be removed and disposed of as part of the modified actions was likely accounted for in the exported material volume assumed in the IS/MND; however, to be conservative and ensure potential impacts from all activities have been considered, this analysis assumes the modified action material removal is in addition to that analyzed in the IS/MND. The anticipated 960 CY of soil to be removed and disposed of per the RAW equates to approximately 23% of the export that was anticipated and modeled for the approved Project. While the haul trips to disposal sites for the soil removal and disposal associated with the modified activities may be slightly longer as some of the material would require disposal at specifically licensed facilities, the volume of soil is a relatively small percentage of effort as compared to the amount of material removal anticipated for the approved Project. Based on the emissions calculated for the approved Project that do not exceed applicable threshold levels, the increase of effort by approximately 23% to perform the modified activities would also not cause an exceedance of applicable emissions thresholds. Regulatory requirements to minimize emissions, such as Rule 403 BACM and standard SCE best management practices would also be implemented as part of the modified activities to further reduce equipment emission generation.

With an expected 960 CY of soil identified in the RAW for excavation and offsite disposal, it can be expected that the modified activities would generate less than 54 truck trips (assuming an 18 CY dump truck) to dispose of the contaminated soils. The IS/MND analyzed a total of 484 hauling trips associated with the approved Project's construction process. While the modified activities-related to haul trips were likely accounted for in the analysis for IS/MND, this Addendum considered them separately and in addition to the approved Project.

The addition of less than 54 truck trips to the overall construction process would not be of the magnitude to increase the generation emissions to a level that would cause an exceedance of applicable emissions thresholds.

Additionally, the IS/MND did not include or assume implementation of SCAQMD Rule 1466, a regulatory requirement regarding the control of particulate emissions from soils with toxic air contaminants. The proposed modified activities would be subject to Rule 1466 because soils found near the proposed warehouse construction area include arsenic, dioxins, and polycyclic aromatic hydrocarbons (PAHs) and involves earth-moving activities of more than 50 CY of soil with applicable toxic air contaminants. Therefore, excavation and management of arsenic, dioxin, and PAH-impacted soil would be performed in accordance with Rule 1466 requirements. Prior to equipment mobilization for modified activities, a Rule 1466 permit would be obtained and signage required by Rule 1466 would be appropriately installed. As detailed in the RAW, Rule 1466 requires that dust emissions be monitored and dust suppression implemented as directed.

To further minimize the generation of fugitive dust, the RAW requires implementation of a Dust Control Plan to monitor and mitigate for the generation of airborne dusts by soil excavation activities. Examples of

required dust control procedures include enclosing earthmoving activities with 6+ foot-tall windscreen fencing, wetting of soils, 15 miles per hour speed limit on site, stabilized traffic and parking areas, cleaning soils from exterior of vehicles, and various measures at ingress/egress points. The RAW also requires a Dust Control Supervisor (DCS) with the authority to stop work in the event that onsite activities generate dust levels in excess of the action levels specified in the RAW. The DCS would also monitor onsite meteorological instrumentation to identify conditions that require cessation of work. All earthwork activities would cease in the event wind conditions change, creating an uncontrollable condition. In addition, controls would be in place to comply with Rules 401 (visual emissions), 402 (nuisance odors), and 403 (fugitive dust).

By implementing required and standard emission and PM reducing procedures during modified activities, generation of emissions and fugitive dust associated with the modified activities would be further minimized. For these reasons, the modified activities would not result in any additional significant adverse air quality impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.

Airborne Soil Contaminants

SCAQMD governs air pollution control requirements and permitting rules that apply to the modified activities including Rule 1466 for excavation of soils with toxic air contaminants and Rule 1166 for excavation of soils with VOCs.

As described above, Rule 1466 would be applicable to modified activities because the site COC's include arsenic, dioxins, and PAHs and more than 50 CY of soil containing these contaminants would be removed. Dust monitoring would consist of real-time dust monitors that are capable of collecting ambient PM₁₀ data every 1 minute or less. The dust and air monitoring would be conducted to ensure worker health and safety is maintained and to maintain safe conditions for workers on the overall property as well as offsite and adjacent properties. Based on real-time air monitoring results, the field geologist would direct the contractors to implement appropriate dust suppression activities and document fieldwork, monitoring, and meteorological conditions. The Dust Control Plan required by the RAW also includes specific measures if soil containing Rule 1466 COCs are stockpiled and during loading of Rule 1466 COC impacted soils onto trucks.

A soil vapor assessment concluded that VOCs were detected at low levels in onsite soils. Thus, SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) would be applicable to the approved Project as described in the IS/MND and would also be applicable to the modified activities. The purpose of Rule 1166 is to control the emission of VOCs from excavating, grading, handling, and treating VOC contaminated soil. Rule 1166 requires monitoring at 15-minute intervals with required actions to suppress VOC vapors (such as water or other VOC suppressants). Additional site-specific actions would be implemented according to a mitigation plan that would be authorized by SCAQMD to reduce exposure to VOCs.

The monitoring and reduction measures dictated by regulatory requirements including SCAQMD Rule 1466, Rule 1611, Rule 401, and Rule 403; the requirements stipulated in the RAW including a fugitive Dust Control Plan, onsite DCS, site specific Health and Safety Plan (HASp); and other standard SCE measures

would serve to reduce and minimize potential for soil contaminants to become airborne and create a hazard to the public or environment. Thus, with implementation of these requirements and procedures, modified activities would result in a less than significant impact related to the exposure of sensitive receptors to substantial pollutant concentrations due to release of chemicals during soil disturbance.

Conclusion: *The modified activities would not result in any additional significant adverse air quality impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3 Biological Resources

As described in the IS/MND, the City is fully developed and retains no suitable natural habitat for special-status species; no rare, endangered, or special-status plant or animal species are known or suspected to exist in the City and the City does not have a Habitat Conservation Plan and/or Natural Community Conservation Plan. The approved Project would occur on a developed industrial site, located within an urbanized setting and would not alter habitat. There are no riparian habitats, wetlands, or other sensitive habitats within the Project site as it is in a heavily industrialized area and is separated by development and infrastructure from open space. The IS/MND found that implementation of the Project would have no significant impact on riparian habitat or other sensitive natural communities.

The proposed modifications to activities would occur within the same footprint as the approved Project and thus, would not create a new or different potential to cause an impact to riparian, wetland, or other sensitive habitat as those resources do not exist on the site or within the immediate area. The potential for impacts to sensitive natural communities would not increase or worsen beyond those identified for the approved Project.

The prior IS/MND concluded that Project construction activities could result in significant impacts to sensitive species, specifically nesting birds. The IS/MND determined that if the removal of existing vegetation associated with the developed area within the limits of work were to occur during the avian breeding season (February 1 through September 15), impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA) could be significant. The IS/MND requires that if vegetation removal would take place within the avian breeding season, Mitigation Measure BR-1 would be implemented:

MM BR-1 Should vegetation removal occur within the breeding season (February 1 through September 15), a qualified biologist² shall be retained no more than 3 days prior to vegetation removal to survey the trees and other vegetation for nests. If nests are found, no vegetation removal shall occur until the Applicant and biologist consult with the CDFW regarding the appropriate buffer that should be established until the nestlings fledge. The

² A qualified biologist is defined as having a bachelor's degree in biology or a closely related field with appropriate areas of study to understand Alhambra's local avian species; sufficient local field experience in identification of avian species; experience in habitat evaluation and in quantifying environmental impacts; and familiarity with suitable mitigation methods, including revegetation design and implementation.

Applicant shall comply with CDFW guidance. If nesting birds are not detected during the survey, then no further mitigation is required.

With implementation of MM BR-1, the potential impact to avian species would be reduced to less than significant.

The modified activities would also be required to implement MM BR-1 as needed. The modified activities involve ground disturbing activities within the same footprint of disturbance associated with the approved Project that was evaluated in the prior IS/MND. With the implementation of the adopted mitigation measure and compliance with state and federal regulatory requirements, the modified activities would not create additional or worsened impacts to avian species beyond those previously identified and implementation of MM BR-1, if necessary, would continue to reduce potential impacts to less than significant.

Conclusion: *The modified activities would not result in any additional significant adverse biological resource impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3.1 Cultural Resources

The prior IS/MND determined that the approved Project would not result in significant impacts to cultural resources. No potentially historic resources were identified within 100 feet of the proposed warehouse site location. Additionally, it was concluded that while the possibility of undiscovered resources cannot be completely ruled out, the potential for the discovery of significant intact buried archaeological resources is low. The IS/MND determined that all ground disturbance related to the approved Project would be within prior disturbed soil related to industrial use and that no further archaeological investigation is recommended. The IS/MND states that if any human remains are encountered during ground-disturbing activities, they are required to be treated in accordance with California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA), which states the mandated procedures of conduct following the discovery of human remains.

The modified activities are within the same disturbance footprint analyzed in the IS/MND. The modified activities involve ground disturbing activities comparable to ground disturbance associated with construction that were evaluated in the prior IS/MND; however, the depth of disturbance may extend deeper in some areas than that anticipated in the IS/MND. Even though the modified activities may include additional disturbance depth within the Project footprint, the Project site and area are not known to have produced cultural resources based on research conducted as part of the IS/MND investigation. Thus, while the modified activities may require deeper excavation in certain locations than anticipated as part of the approved Project and the possibility of unknown cultural resources cannot be entirely ruled out, the potential to cause an adverse change to a historical or archaeological resource is not substantially increased or worsened beyond that identified for the approved Project.

Similarly, implementation of the modified activities are required adhere to the regulatory requirements related to disturbance of human remains. With adherence to California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e),

the modified activities would not result in additional significant adverse impacts or a substantial increase in the severity of the impacts related to the discovery of human remains as identified in the IS/MND.

Conclusion: *The modified activities would not result in any additional significant adverse cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3.2 Energy Resources

The prior IS/MND indicated that neither construction nor operation of the approved Project would result in wasteful, inefficient, or unnecessary consumption of energy resources. Title 24 of the California Administrative Code mandates uniform energy conservation standards for new construction. New development projects are required to incorporate green building standards, which promote environmentally responsible and resource-efficient design through siting, construction, operation, maintenance, renovation, and de-construction. It was determined in the prior IS/MND that the green project design features have been incorporated into the warehouse design (such as solar tubes and skylights, water saving measures, energy saving measures, and landscaping and design) and operation of the approved Project would result in increased energy efficiency at the Facility.

The modified activities involve the use of similar construction equipment to that evaluated in the prior IS/MND and while additional energy and resources would be used to conduct the increased soil testing and removal, these activities are not considered wasteful, inefficient, or unnecessary and are required for the safe disposal of the contaminated materials.

Conclusion: *The modified activities would not result in any additional significant adverse energy resource impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3.3 Geology and Soils

The prior IS/MND indicated that approved Project construction activities would not result in significant impacts to geology and soils, except as related to paleontological resources. The IS/MND found that the Project site is not within an Alquist-Priolo Earthquake fault zone and no known active faults are believed to cross through the property. The Project area is generally flat with no slopes immediately adjacent and poses low risk for liquefaction, is not located within a landslide hazard zone, and does not contain clays soils that would shrink or swell. The approved Project would comply with all applicable CBC requirements and recommended engineering design. Therefore, the Project would not result in an increased risk related to unstable geologic conditions.

The same site conditions described in the IS/MND apply to the modified activities as they occur within the same Project footprint. While additional excavation to greater depths would occur with the modified activities as detailed in the RAW, the modified actions would comply with all applicable CBC requirements and recommended engineering design relative to soil removal and would not increase the potential for risk associated with unstable soil or other geologic hazards beyond that outlined in the IS/MND. No wastewater treatment or disposal systems are included as part of the modified activities.

The prior IS/MND discussed how the City of Alhambra's General Plan does not identify paleontological resources in the Project area.; However, sub-surface paleontological resources have been found throughout southern California; therefore, such resources may also potentially exist within the City. The IS/MND indicated that the Facility is located on a previously developed area, and it is unlikely that paleontological resources would be discovered. Thus, the IS/MND concluded that during any construction-related ground disturbance undiscovered paleontological resources could possibly be uncovered in the underlying geologic formations. Unlike discovering cultural resources during ground disturbance activities, there is no regulatory protection of unknown paleontological resources. Therefore, the prior IS/MND required Mitigation Measure GEO-1, which would reduce impacts to paleontological resources to less than significant.

MM GEO-1 To avoid potential impacts to unknown (i.e., buried) paleontological resources, mitigation in the form of monitoring during construction-related ground disturbance activities shall be required. Monitoring shall be performed by qualified paleontological monitors. In the event that previously unidentified potentially significant paleontological resources are discovered, the monitor(s) shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery until such time that the sensitivity of the resource can be determined.

Similarly, MM GEO-1 would also be required for the modified activities since the possibility of ground disturbance uncovering paleontological resources in the underlying geologic formations could occur. As determined for the approved Project, with implementation of the required mitigation measure, the modified activities would not result in any additional significant adverse geology and soils impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND relative to paleontological resources.

Conclusion: *The modified activities would not result in any additional significant adverse impacts to geology and soils or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3.4 Greenhouse Gas Emissions

As indicated in the prior IS/MND, impacts related to greenhouse gas emissions were found to be less than significant. The IS/MND determined that heavy-duty off-road equipment, materials transport, and worker commutes during construction of the approved Project would result in exhaust-related GHG emissions. It was also noted in the IS/MND, that the City has not established screening thresholds for GHG emissions, the analysis uses the applicable significance thresholds developed by the SCAQMD. The SCAQMD has adopted a significance threshold of 10,000 metric tons (MT) of CO₂e per year for industrial (stationary source) projects. Total GHG emissions associated with construction of the approved Project would be approximately 372 MT CO₂e. Amortized over the 30-year life of the Project, annual construction emissions would be approximately 12 MT CO₂e per year.

As described in the IS/MND, the approved Project includes more efficiently accommodating existing staff and storage functions at the existing Facility. As such, the approved Project would not be anticipated to result in an increase in vehicle trips associated with staff or warehouse operations as capacities and operations would not substantially change. Additionally, it was determined in the IS/MND that the

approved Project would not conflict with the City of Alhambra General Plan; AB 32 and SB 32 Scoping Plan; or any other plans, policies, or regulations for the purpose of reducing GHG emissions.

Similarly, the modified activities would use diesel vehicles and equipment during implementation of the testing and material removal activities that are comparable to those associated with the Project construction that was evaluated in the prior IS/MND. The 960 CY of soil that would be removed and disposed of as part of the modified actions was likely accounted for in the exported material volume assumed in the IS/MND; however, to be conservative and ensure potential impacts from all activities have been considered, this analysis assumes the modified action material removal, including haul trips, is in addition to that analyzed in the IS/MND. With an expected 960 CY of soil identified in the RAW for excavation and offsite disposal, it can be expected that the modified activities would generate less than 54 truck trips to dispose of the contaminated soils. The IS/MND analyzed a total of 484 hauling trips associated with the approved Project's construction process. While the modified activities-related to haul trips were likely accounted for in the analysis for IS/MND, this Addendum considered them separately and in addition to the approved Project.

The addition of less than 54 truck trips to the overall construction process would not be of the magnitude to increase the generation of greenhouse gases associated with the Project to near the 10,000 MT CO₂e threshold. Additionally, the implementation of the modified activities would not conflict with a plan, policy or regulation related to reducing greenhouse gas emissions.

Conclusion: *The modified activities would not result in any additional significant adverse impacts related to GHG emissions or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3.5 Hazards and Hazardous Materials

As indicated in the prior IS/MND, implementation of the approved Project would result in less than significant impacts related to hazards and hazardous materials, including the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, creation of a risk due to location near a school or airport, or interference with an emergency plan. The Facility has a history of contamination and has undergone a series of environmental investigations, as detailed in the RAW. The analysis noted that total petroleum hydrocarbon (TPH)-contaminated soil has been identified at the SCE Alhambra Campus and has been previously discarded at three landfills within the County of Los Angeles and that during construction of the approved Project, TPH-impacted soil would also be disposed of at these facilities as appropriate. Project construction would require the transport, temporary storage, and use of asphalt fuels, paints, and solvents. Limited amounts of hazardous materials may be transported to the Project site for construction or used during the construction phase (e.g., certain building materials, equipment, diesel engines, engine oil, etc.). During construction of the approved Project, regulatory requirements as well as standard construction BMPs and safety procedures would be implemented to minimize the risk of accidental release. The operation of the warehouse would be similar to that of the existing SCE Alhambra campus uses and would be consistent with applicable federal, state, and local regulations pertaining to the handling of hazardous substances.

Since the adoption of the IS/MND, the Project has advanced in planning and design and there are now more details of the site conditions that require specific actions for the identification and safe removal of contaminated materials onsite. Based on the known contaminants of the site and construction requirements, the RAW was developed in response to comments made by the DTSC in May 2023 regarding SCE's proposed removal of contaminated soil prior to the planned over-excavation and recompaction of soil in the southwest portion of the Facility for construction of the proposed warehouse.

Future construction of the warehouse would involve the over-excavation and recompaction of the top 2 to 9 feet of soil in the vicinity of the proposed warehouse, with deeper (up to 13 feet) localized excavations for building footings, utilities, and support columns, as shown in the RAW. The goal of the proposed modified activities (i.e., soil sampling, excavation, and disposal) is to remove soil that contains COC at concentrations above the removal action goals from areas where future excavation is planned for the construction of the proposed warehouse. Excavating and removing this soil prior to construction activities would minimize construction worker contact, spreading of the soil to other areas of the site, and potential mismanagement of the soil. Soil that contains COC concentrations above the removal action goals but is not within any planned construction excavation area would remain undisturbed in situ and would be addressed by a focused health risk evaluation to be conducted following the soil removal action. In addition, a quantitative human health risk assessment would be conducted after construction is completed for the entire Area of Concern 1, which includes the warehouse and the data center. See Section 2.2 for details describing the modified activities.

The RAW provides details on the regulatory requirements, procedures, and limitations that would be in place during testing, excavation, and disposal of contaminated materials conducted as the modified activities for the purpose of controlling, mitigating, or eliminating the potential health risks associated with the Site COCs. Removal actions generally have the potential to introduce environmental risks or physical hazards to construction workers. Examples of these requirements include SCAWMD Rule 1466 and Rule 1166 (see Air Quality for more details); DTSC's California's Hazardous Waste Management Program that mandates the control of hazardous wastes from the point of generation through accumulation, transportation, treatment, storage, and disposal; Sections of CCR Title 22, Division 4.5, pertaining to the identification, treatment and disposal of hazardous wastes; a Stormwater Pollution Prevention Plan (SWPPP) to minimize potential for polluted runoff; a DTSC approved Site-Specific HASP conforming to requirements of Title 29 of the Federal Code of Regulations, Section 1910.120; health and safety requirements of state and federal Standards for Hazardous Waste Operations and Emergency Response (HAZWOPER); and all other requirements detailed in the RAW or other applicable regulations.

With the implementation of regulatory requirements identified in the RAW and others as applicable that serve to avoid and minimize public and environmental hazards due to the release of hazardous materials, the modified activities would not result in any additional significant adverse hazardous materials impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.

Conclusion: *The modified activities would not result in any additional significant adverse impacts related to hazards and hazardous materials or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3.6 Hydrology and Water Quality

As indicated in the prior IS/MND, implementation of the approved Project would not result in potentially significant impacts to hydrology and water quality. The approved Project would not use groundwater for any purpose, and implementation of the bioretention basins at the site would provide for groundwater recharge during small storm events. In addition, the Project does not involve operations that would interfere substantially with groundwater recharge. The approved Project would include grading, repaving, utility installation, and building construction, which could result in generation of water quality pollutants such as silt, debris, chemicals, paints, and other solvents that could affect water quality if uncontrolled. The IS/MND noted that during construction, the construction contractor would remove the existing concrete and asphalt ground cover, stockpile soil, and grade the site, which may expose loose soil to potential erosion and potential movement offsite. However, the approved Project would require compliance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit 2009-0009-DWQ, which includes the preparation and implementation of a SWPPP to obtain grading and building permits. The SWPPP would identify site-specific construction BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater runoff from the Project site and ensure that short-term water quality impacts during construction are not significant. Construction BMPs would include, but are not limited to, the following:

- Minimization of disturbed areas to the portion of the Project site necessary for construction
- Stabilization of exposed or stockpiled soils (if greater than 14 days)
- Establishment of permanent revegetation or landscaping as early as feasible
- Removal of sediment from surface runoff before it leaves the Project site by silt fences or other similar devices around the site perimeter
- Diversion of upstream runoff around disturbed areas of the Project site
- Protection of all storm drain inlets on-site or downstream of the Project site to eliminate entry of sediment
- Prevention of tracking of soil through use of a gravel and shaker plates at exits from the Project area
- Proper storage, use, and disposal of construction materials
- Continual inspection and maintenance of all specified BMPs through the duration of construction

These regulatory standards would enable the approved Project to meet the City of Alhambra's adopted Municipal Code Chapter 16.36 Stormwater Low Impact Development (LID) Standards, which contain requirements for construction activities and facility operations of development and redevelopment projects to comply with the current Municipal NPDES permit. Subsequently, the Low Impact Development Plan and SWPPP have been developed.

The proposed modified activities would occur in the same footprint as the approved Project and would also be subject to the comply with LID Standards, NPDES, SWPPP, and BMPs. Similar to the approved Project, implementation of these regulatory requirements during modified activities would serve to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater runoff from the Project area. Thus, impacts related to hydrology and water quality would remain less than significant during implementation of the modified activities.

Conclusion: *The proposed activities would not result in any additional significant adverse impacts related to hydrology and water quality or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3.7 Land Use and Planning

The prior IS/MND concluded that the approved Project would have no impacts with respect to established communities, land use designations, or public land use policies. The proposed modified activities would occur in the same footprint as the approved Project and is simply an interim step added within the overall process of Project construction. The modified activities would make no change to the existing or approved Project land use that would continue and maintain the existing industrial use of the Project site.

Conclusion: *The potential impacts of the modified activities related to land use and public land use policies would remain less than significant as identified in the prior IS/MND.*

3.3.8 Mineral Resources

As indicated in the prior IS/MND, the approved Project would not result in significant impacts to mineral resources. The IS/MND discusses how soil types found in the City of Alhambra, such as gravelly loams, sandy loams, and clays, do not contain any significant mineral resources. The modified activities would occur in the same footprint as the approved Project and would not create a new or additional impact to mineral resources as they are not known to be present within the Project site.

Conclusion: *The potential impacts of the modified activities related to mineral resources would remain at no impact as identified in the prior IS/MND.*

3.3.9 Noise and Vibration

As indicated in the prior IS/MND, implementation of the approved Project would not result in significant impacts related to noise and vibration. It was determined that there are no noise-sensitive receptors (e.g., residences, educational facilities, or hospitals) located on or adjacent to the Facility.

Additionally, the IS/MND describes that per the City of Alhambra General Plan Noise Element (2019a), industrial land uses may generate a decibel level of 70 dBA. The Noise and Vibration Control Ordinance (City Municipal Code Section 18.02.050) addresses and limits excessive noise. The IS/MND identifies that construction activities for the Project were deemed to be exempted from the ordinance, per Section

18.02.060(C). The IS/MND also determined that the Facility is not within an airport land use plan or within 2 miles of a publicly used airport.

Additionally, the IS/MND states that vibration levels would be below the thresholds of human annoyance and risk of structural damage (0.2 in/sec peak particle velocity (ppv)) for structures 25 feet or farther from construction equipment and City vibration thresholds per Municipal Code Section 18.02.100 (0.5 in/sec ppv).

The proposed sampling, excavation, and removal activities would involve noise generation that would be very similar to that of the approved Project construction activities. Modified activities would require the use of standard construction equipment similar to what was anticipated in the IS/MND. The slight increase in equipment use for additional sampling, excavation, and hauling of contaminated materials relative to what was anticipated in the IS/MND would not be of the magnitude to create increased or more severe noise or vibration impacts. Such construction activities were determined by the prior IS/MND to be less than significant and would be exempt from City Municipal Code Section 18.02.050.

Conclusion: *The modified activities would not result in any additional significant adverse noise impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3.10 Population and Housing

The prior IS/MND concluded that the approved Project would have no impacts with respect to population and housing. The modified activities would also not displace housing nor induce growth as the proposed activities include soil sampling and removal of material from within the existing Facility and within the same footprint analyzed in the IS/MND. Generally, the same workforce anticipated for the approved Project would be applicable to support the modified activities and would not create additional demand for housing, goods, or services.

Conclusion: *The potential impacts of the modified activities related to population and housing would remain with no impacts as identified in the prior IS/MND.*

3.3.11 Public Services

As stated in the prior IS/MND, the approved Project would have no impact to public services as it would result in a more efficient consolidation of existing storage and staff within an existing industrial complex with similar operating capacity as under current conditions. Thus, there would be no effect on emergency response times or other public services such as schools, parks, or other public facilities.

Similarly, the modified activities would not increase the demand for public services as compared to the approved Project, as the proposed actions are interim steps within the planned construction process and include soil sampling and increased material removal for the proposed warehouse area and would not alter the approved Project operations. The modified activities are not of the nature to create an increased demand on public services.

Conclusion: *The potential impacts of the modified activities related to public services would remain with no impacts as identified in the prior IS/MND.*

3.3.12 Recreation

As indicated in the prior IS/MND, the approved Project would not result in a significant impact to recreation. The approved Project does not propose any public residential use that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. Rather, the approved Project would be a consolidation of storage facilities and associated staff within an existing industrial campus in an urbanized setting.

Similarly, the modified activities would not include any action that involves recreational uses or could create additional demand on recreational resources.

Conclusion: *The potential impacts of the modified activities related to recreation would remain less than significant as identified in the prior IS/MND.*

3.3.13 Transportation

The prior IS/MND indicated that the Project would not result in any significant impacts related to transportation. It was determined that the approved Project would not conflict with Southern California Association of Government's (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the City of Alhambra's traffic regulations and design standards. The IS/MND found that the approved Project would not produce a detrimental impact on existing bicycle and pedestrian facilities and would not create potential conflicts with programs, plans, ordinances, or policies addressing the circulation system. Potential impacts to road hazards or emergency access were also found to be less than significant.

The IS/MND identified that the approved Project would result in a short-term increase in vehicle miles traveled (VMT) during construction but would not increase the number of trips or VMT during operation of the Project as operations or staffing at the Facility would not be increased as a result of the Project. The approved Project would not include road widening or other improvements that would induce travel or increase VMT.

The IS/MND described that disposal of site materials would occur off-site in a proper disposal facility. The analysis noted that total petroleum hydrocarbon (TPH)-contaminated soil has been identified at the SCE Alhambra Campus and has been discarded at three landfills within the County of Los Angeles and that during construction of the Project, TPH-impacted soil would also be disposed of at these facilities as appropriate. Construction analyzed in the IS/MND included the assumption of approximately 3,873 cubic yards of material being exported from the Facility with heavy trucks transporting materials with the understanding of contaminated soils being part of the Facilities existing condition.

During the 1 to 2-month timeframe for implementation of the modified activities, haul trips to and from the Project site would occur, similar to those anticipated for material disposal associated with the approved

Project. The IS/MND analyzed a total of 484 hauling trips associated with the approved Project's construction process. While the modified activities-related haul trips were likely accounted for in the analysis for IS/MND, this Addendum considered them separately and in addition to the approved Project. With an expected 960 CY of soil identified in the RAW for excavation and offsite disposal, it can be expected that the modified activities would generate less than 54 truck trips (assuming use of an 18 CY dump truck) to dispose of the contaminated soils. Even if the modified activities were to be completed within one month, that would total approximately 20 workdays (Monday-Friday) and the average of 54 truck trips over that time period would be less than 4 truck trips per day. This volume of required haul trips for material disposal associated with the modified activities would not be of the magnitude to create significant impacts related to transportation plans, VMT, or other transportation-related operations or facilities. Additionally, all transportation associated with the modified activities would be subject to the requirements and limitations set forth in the Traffic Control Plan prepared for the approved Project. Additionally haul trips would only occur during construction activities. Any transportation-related activities or changes would cease at the completion of the modified activities.

Conclusion: *The modified activities would not result in any additional significant adverse traffic impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND.*

3.3.14 Tribal Cultural Resources

At the time of the approval of the prior IS/MND, the City was undergoing AB52 consultation with interested parties and the potential for impact to tribal cultural resources was unknown and dependent on the outcome of the consultation effort. If the consultation resulted in the identification of tribal cultural resources that could be substantially impacted and there were mitigation or other measures required of the approved Project to minimize those impacts, the modified activities would also be subject to those same requirements. Because the modified activities are within the same disturbance footprint of the approved Project, it is assumed that no new substantially increased impacts to tribal cultural resources would result.

Conclusion: *The modified activities would not result in any additional significant adverse tribal cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior IS/MND or as a result of the City's AB 52 consultation process.*

3.3.15 Utilities and Service Systems

The prior IS/MND indicated that the approved Project would have no significant utilities and services impacts as sufficient supplies are available and the Project would not result in a substantial increase in demand or need for new or additional service or associated infrastructure.

While the modified activities-related soil removal and disposal was likely accounted for in the analysis for IS/MND, this Addendum considered it separately and in addition to the approved Project. The modified activities would result in an increase in the demand for solid waste disposal as the proposed soil removal and off-site disposal of approximately 960 CY of material through multiple waste streams (dependent on soil condition). The RAW notes that DTSC administers California's Hazardous Waste Management Program which mandates the control of hazardous wastes from the point of generation through

accumulation, transportation, treatment, storage, and disposal. The DTSC implements Sections of the CCR Title 22, Division 4.5, pertaining to the identification, treatment, and disposal of hazardous wastes.

The excavated soil would be sampled and characterized prior to transport offsite. Soil samples would be collected and analyzed in accordance with disposal facility requirements for soil characterization and profiling. The selected SCE approved offsite disposal facility would be screened to determine if it is suitable to accept waste from the modified activities. Although generation of RCRA-hazardous soils is not anticipated, should testing confirm that any waste from the Project site shall be classified as RCRA hazardous waste, it would be transported to an SCE-approved licensed Class 1 disposal facility. California (non-RCRA) hazardous soils would be transported to a SCE approved licensed Class 1 disposal facility or proper out-of-state disposal facility licensed to accept such waste. Non-hazardous soils would be transported to a Class III landfill, either as fill or to be recycled as alternate daily cover, or to a Class II facility, depending on the chemical composition within the soil.

All waste would be transported and disposed of in accordance with applicable laws and regulations. The quantity of soil removed from the Project site would be documented in the field, and tonnage would be confirmed with truck (weight) tickets or bills of lading, provided by the receiving facilities to the excavation contractor, for each load of waste that has been transported offsite. Soil disposal would be documented with appropriate documentation (a Uniform Hazardous Waste Manifest, Non-Hazardous Waste Manifest, or bill-of-lading, as appropriate). It is anticipated that of the estimated 960 CY to be removed, the majority of the soil (approximately 929 CY) would be transported as non-hazardous waste and approximately 31 CY would be removed from the Project site and disposed of as non-RCRA hazardous waste.

Because the receiving facility has not yet been selected, truck routes to the facility cannot be provided; however, truck traffic would be minimized through residential areas and local streets. The route would be finalized following a decision on the disposal facilities and a visual inspection of each route. If additional areas of contaminated soil are detected during construction activities, other than the designated 16 soil removal areas, the soil would be managed in accordance with the Soil Management Plan (SMP) provided in Appendix G of the RAW.

Contaminated soil removal and disposal performed as part of the proposed modified activities would be in accordance with applicable federal, state, and local laws, regulations, and ordinances related to solid waste and would adhere to the requirements of the RAW, SMP, and any other applicable Project plans. The facilities selected for disposal of the contaminated materials would be appropriate in level of license to accept the material and available capacity. For these reasons, the modified activities that include sampling, excavation, and disposal of additional material beyond that considered in the prior IS/MND would not result in any changes to the conclusion of the prior IS/MND and potential impacts related to utilities and services would not worsen in severity.

Conclusion: *The potential impacts of the modified activities related to utilities and services would remain less than significant as identified in the prior IS/MND*

3.3.16 Wildfire

The prior IS/MND determined that the approved Project would not include any changes to the existing public roadways that provide emergency evacuation or access to the site or surrounding area. The Project site is located in an urban environment and would not have the potential to result in any impacts to the potential for wildfire risk. The IS/MND notes that the City is a built-out community not highly subject to wildfire risk.

The modified activities would include additional sampling, excavation, and disposal of contaminated materials and these actions would not result in any additional significant adverse impacts or increase in the severity risk from wildfire in the urbanized and developed Project site and vicinity.

Conclusion: *The potential impacts of the modified activities related to wildfire risk would remain as no impact as identified in the prior IS/MND.*

3.3.17 Mandatory Findings of Significance

The conclusions drawn in the IS/MND relative to mandatory findings of significance are also applicable to the modified activities. As documented in this Addendum, the modified activities could degrade the quality of the environment as a result of impacts to special-status avian species and/or common birds protected by the MBTA. Mitigation Measure BR-1 would be required to reduce these impacts to less than significant.

The modified activities could degrade the quality of the environment as a result of impacts to biological resources and paleontological resources, similar to those impacts identified in the IS/MND for the approved Project. These impacts could be cumulatively considerable without mitigation; however, the proposed mitigation measures for these impact areas reduce the impact and the modified activities' potential contribution to cumulative impacts to less than significant.

Compliance with applicable federal, state, and local regulations would result in the modified activities having no substantial adverse direct or indirect impacts on human beings.

4.0 CONCLUSION

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

5.0 REFERENCES

City of Alhambra. 2020. *Southern California Edison Alhambra Warehouse Project Initial Study Mitigated Negative Declaration* (IPD-19-01 and CU-19-01), SCH# 2020039065. Adopted June 15.

Northgate Environmental Management, Inc. 2023. *Removal Action Work Plan for the Proposed Warehouse Area. SCE Alhambra Facility, 501 South Marengo Avenue, Alhambra, California.* July.