

**Dumbarton Quarry Reclamation Plan Amendment
(Fremont File Number: PLN2018-00065)**

**Addendum to Initial Study/Mitigated Negative Declaration
(SCH No. 2012052059)**

Background

This Addendum has been prepared in accordance with the California Environmental Quality Act (CEQA) for a Mitigated Negative Declaration (*Rec Plan MND*) that was adopted by the City of Fremont Planning Commission on September 27, 2012, for the Dumbarton Quarry Reclamation Plan Amendment and associated entitlements (see Appendix A: *Dumbarton Quarry Reclamation Plan Amendment Initial Study*). The project evaluated in the *Rec Plan MND* was described as follows:

The project consists of an amendment to an existing and previously approved Reclamation Plan for Dumbarton Quarry, California Mine ID#91-01-0001. The major change to the plan is to backfill the previously excavated quarry rather than divert water to fill the excavation pit. The project sponsor has submitted applications for a Preliminary Grading Plan and amendment to Conditional Use Permit U-66-53 to import up to six million cubic yards of fill material that will be placed in the former quarry pit. Site grading, erosion control and revegetation measures are also included in the project. This analysis evaluates the potential on-site impacts from earthwork activities to move material into the pit and establish contour grades in areas outside of the pit. Up to one bulldozer, one grader and one water truck would be used on site for these activities. (For additional detail, see Appendix A: *Dumbarton Quarry Reclamation Plan Amendment Initial Study*.)

Activities associated with the approved Reclamation Plan Amendment, Preliminary Grading Plan, and amendment to Conditional Use Permit U-66-53 commenced in January 2013 and have been ongoing. In September 2017, Dumbarton Quarry Associates, filed an application for a subsequent amendment to the above-mentioned entitlements.

The Dumbarton Quarry site is being reclaimed in two phases, shown in *Attachment 1: Grading Plan*. Phase 1 encompasses the area east of the quarry pit excavation and is shown in Sheets 3 (grading) and 4 (erosion control). This phase is currently being completed and is approved for a park use to be operated by the East Bay Regional Park District (EBRPD). Phase 2 encompasses the quarry pit excavation and is shown in Sheets 5 (grading) and 6 (erosion control).

Rather than leave a meadow in place of the quarry pit (Phase 2 area), as was evaluated in the *Rec Plan MND*, the currently proposed amendment to the Reclamation Plan would allow the continued import of soil to create a hill atop the quarry pit, better conforming to the site's pre-mining topography, as discussed in the *Revised Project Description* below. This Addendum to the *Rec Plan MND* considers the proposed changes to the quarry pit to re-create the pre-mining hill topography.

Separate from the Reclamation Plan, the Dumbarton Quarry Park Plan, approved in 2013, allows public park uses in the Phase 1 and Phase 2 areas. The then-approved Park Plan envisioned a meadow atop the quarry pit and creation of 17 walk-in and 20 car campsites at the edges of the area. A Mitigated Negative Declaration for the Dumbarton Quarry Park Plan was adopted by the City Council on September 3, 2013 (*Park Plan MND*). Phase 1 of the Dumbarton Quarry Park Plan is currently under building permit review. The applicant has submitted a Planned District Major Amendment application to amend the Dumbarton Quarry Park Plan's Phase 2 area, to allow hiking trails atop the re-created hill (that is the subject of this Addendum), and 20 walk-in and 26 car campsites (rather than the previously approved 17 walk-in and 20 car campsites). Should the proposed Reclamation Plan Amendment be approved, environmental review will be conducted in conformance with CEQA for the proposed Planned District Major Amendment application.

Revised Project Description

The proposed project revision includes a continuation of earthwork activities and truck traffic to import soil material at Dumbarton Quarry with an estimated completion date of 2034. The former quarry pit is currently being filled with excavations from various construction sites throughout the San Francisco Bay Area region to a grade roughly level with the surrounding topography. This is being conducted under an approved Reclamation Plan. The approved end use of this activity will be a regional park with recreation opportunities. The proposed project revision would restore the pre-mining topography by re-creating a hill atop the quarry pit, rather than leaving the site at level grade. The hill restoration would be achieved through the import of up to an additional four million cubic yards (cy) of fill. As discussed in more detail in Appendix B: *Dumbarton Quarry Project Description July 2018*, the site previously included a hill in the area of the quarry pit. The currently proposed amendment to the Reclamation Plan would allow that pre-mining site topography to be restored.

From Appendix B: *Dumbarton Quarry Project Description July 2018*:

The project consists of revising the topography of the fill being placed in the Dumbarton Quarry excavation to more closely resemble pre-mining conditions, which included a hill reaching 280 feet above mean sea level (msl). Dumbarton Quarry's current Reclamation Plan calls for the grading of backfill into a meadow with a final elevation of 36 feet above msl using up to six million cubic yards of imported fill. The proposed project would instead allow the continued placement of imported fill on a portion of the property to create a hill up to 165 feet above msl to more closely resemble pre-mining conditions (see Figures 1 and 2). The proposed hill would consist of approximately 9.2 million cubic yards of fill (in place). The actual quantity of additional fill imported to the site to achieve the final reclamation surface of 165 feet above msl is estimated to be 3.5 million cubic yards; however, the actual amount would depend on settlement and compaction rates and the availability of fill material. The exact final elevation would depend on the availability of fill materials, but shall not exceed 165 feet above msl. Thus, the project consists of increasing fill elevations by up to 129 feet above msl and fill quantities up to approximately 3.2 million cubic yards (in place). Fill slopes would be 3:1 (horizontal to vertical).

Previous Environmental Analysis

Previous relevant environmental analysis includes:

1. Draft and Final Environmental Impact Report 76-6 (*EIR 76-6*), which was certified on July 22, 1976, for the expansion of the existing quarry operations to remove an additional seven million cubic yards of material.
2. An addendum to EIR 76-6 was approved on February 5, 1997, to evaluate continued quarry operations for ten years to 2007 and deeding the property to East Bay Regional Park District for eventual rehabilitation to a regional park. This addendum did not identify any new impacts that were not analyzed in previous environmental documents.
3. A second addendum to EIR 76-6 was prepared and adopted on April 14, 2011, for the import of 1.5 million cubic yards of material to the site and to be placed in the quarry pit. This addendum did not identify any new impacts that were not analyzed in previous environmental documents.

The prior environmental review documents evaluated the entire expanded quarry operations as it was proposed and existed from 1977 to 2007 with reclamation to a regional park. The EIR project description included the removal of approximately seven million cubic yards of rock and associated grading, crushing, asphalt manufacturing, and trucking off-haul. The following provides a summary of the previous environmental analysis and topics studied:

- In regards to truck traffic, EIR 76-6 assumed a yearly average of 80 trucks per day, however, depending on demand, the number of truck trips was assumed up to 400 on any given day with time of year and weather conditions influencing number of trips. Due to the proximity of Route 84 and proposed expansion which has since occurred, and the small percentage increase in overall daily traffic combined with little to no traffic occurring on local roads, truck trips were determined to be a less than significant impact.
- Air quality was also evaluated in EIR 76-6. The air quality analysis evaluated air quality impacts from both the actual quarrying operation and the operation of diesel trucks which haul the material. Since the quarry has ceased operations, direct impacts from the quarry itself no longer exist. The EIR evaluated diesel emissions against U.S. Environmental Protection Agency (EPA) guidelines at that time and the percentage of carbon monoxide, hydrocarbons and nitrogen oxide emitted compared to traffic on Route 84. During average quarry truck trips of 80 trips per day the trucks would account for only 0.5 percent of the carbon monoxide emissions from Route 84; and, one percent of the hydrocarbons and six percent of the nitrogen oxide emissions. These levels are considered less than significant impacts. Given improved emission standards over time, these levels would be expected to be slightly lower. Existing mitigation to control dust of street sweeping, use of watering trucks and covering loads are still applicable.
- Addendum to EIR 76-6 was approved on February 5, 1997, and evaluated certain potential impacts from continued quarry operations. The Addendum evaluated the project's potential impacts related to traffic, air quality, hydrogeology, wildlife and vegetation, noise, odor and visual quality. The Addendum did not identify any new impacts associated with the continued quarry operations, and no new mitigation was required. In regards to traffic and air

quality, the Addendum found that no additional vehicle trips beyond existing levels will be generated, thus, not increasing vehicle emission levels. Existing mitigation and conditions of approval to control dust will continue to be required.

- A second Addendum to EIR 76-6 was prepared in April 2011, to consider impacts to importing up to 1.5 million cubic yards of material to the site. This analysis evaluated the on-site impacts of up to 100 loads of material per day and the operation of a bulldozer to push the material into the pit; a water truck to control dust and dampen areas of the site to limit dust accumulation; and a street sweeper to clean nearby roadways, namely Quarry Road, which is under California Department of Transportation (Caltrans) jurisdiction. Because this project did not raise new issues to make the previous EIR inadequate under CEQA and because these changes do not raise new significant impacts on the environment, the analysis was prepared as an addendum to the previous EIR.
- The *Rec Plan MND* evaluated an amendment to the prior Reclamation Plan (approved by the City in 1997) to allow the import of an additional six million cubic yards of fill material to fully backfill the quarry excavation pit to a final elevation of 36 feet above msl. The prior Reclamation Plan specified that the quarry pit would be filled with water for public recreation uses and conversion to a regional park; however, the planned lake had no identified water source or drainage outlet. It was determined that procuring a water source and permitting an internally draining basin created obstacles in implementation due to changes in environmental and regulatory conditions. As such, the Reclamation Plan was amended in 2012 to allow the quarry pit to be filled with soil to create a meadow rather than a lake. The *Rec Plan MND* evaluated fill operations to place approximately six million cubic yards of material into the former quarry pit and associated grading, erosion control, and stabilization.

CEQA Framework for Addendums

In accordance with CEQA and Section 15164 of the CEQA Guidelines, an Addendum to an adopted MND may be prepared if only minor technical changes or additions are necessary or none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent MND have occurred. Under CEQA Guidelines Section 15162, the lead agency shall prepare a subsequent MND if it determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- (1) *Substantial changes are proposed in the project which will require major revisions of the previous . . . negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*¹
- (2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous . . . negative declaration*

¹ CEQA Guidelines Section 15382 defines “significant effect on the environment” as “. . . a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance . . .” (see also Public Resources Code, Section 21068)

due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous . . . negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous negative declaration;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. (CEQA Guidelines Section 15162(a); see also Public Resources Code Section 21166).

Staff has reviewed the previously adopted *Rec Plan MND* in relation to the proposed changes. Based on this review and the analyses provided below, staff has determined that none of the above conditions are present and a new MND or Environmental Impact Report (EIR) is not required. Thus, this Addendum to the *Rec Plan MND* is the appropriate CEQA document. The following chart explains why no further environmental analysis is required for each of the impacts evaluated in the *Rec Plan MND*, with the exception of air quality, greenhouse gas emissions, and traffic, all of which are discussed in further detail below.

Environmental Topic	Summary of Previous Analysis
Aesthetics	The aesthetics analysis provided in the <i>Rec Plan MND</i> determined that the project would have a less than significant impact on the visual character or quality of the site and its surroundings and no impact to a scenic vista or scenic resources and would not create a new source of substantial light or glare. The proposed project revision to allow restoration of the hill over the quarry pit to better match the site's pre-mining topography would not alter this determination. Therefore, no further environmental review is necessary on this topic.
Agriculture/Forestry Resources	The project site does not contain agricultural land or forest resources.
Biological Resources	No new land area on the project site would be excavated or filled as a result of the proposed changes to the project, and existing mitigation for biological resources remain applicable. As such, it can be concluded

Environmental Topic	Summary of Previous Analysis
	<p>that the revised project would not have previously undisclosed impacts on biological resources that would necessitate further environmental review.</p> <p>Public comments concerning biological resources that were received for the <i>Rec Plan MND</i> were re-examined in the context of the current proposal (see <i>Dumbarton Quarry Updated Responses to Comments from the Citizens Committee to Complete the Refuge</i>). As discussed in that document, the revised park plans are likely to have a more beneficial ecological outcome than the 2012 plans, due to the remediation of the site to more closely resemble its original pre-mining topography and habitat. The Coyote Hills Regional Park was originally a series of low, bayside hills and the proposed plan would recreate that topography with an approximately 180-foot elevation hill that would more closely match the other hills to the north. Landscaping the re-created hill with native grasses, shrubs and trees would increase the amount of native habitat and provide significant ecological benefit to wildlife in the surrounding areas. Human activities in the campground, trails, and amphitheater would be consistent with allowing public access to open spaces and would have far fewer negative impacts to the area than the past 40 years of quarry activity.</p>
Cultural Resources	No new land area on the project site would be excavated or filled as a result of the proposed changes to the project.
Geology/Soils	<p>The approved end use for the quarry site is a regional park with recreation opportunities, including a hiking trail. A portion of the proposed hiking trail would be located atop the restored hill, after the hill is formed and the fill material has settled. It is anticipated that a majority of the fill settlement would occur during the approximately eight-year process of soil import, though additional settlement may occur shortly afterwards. See <i>Appendix E: Geotechnical Peer Review Letter 9-18-2018</i> for further discussion.</p> <p>The settling process would require monitoring to ensure that the hill may be used safely. The need for monitoring is part of the process of constructing the hill, and is not considered a significant environmental effect because settling would not create off-site impacts. Even though settling would not pose a previously undisclosed significant environmental effect, the following condition of approval is proposed to ensure appropriate monitoring and safety.</p> <p>Condition of Approval: Prior to approval of a grading permit for Phase 2 of the Reclamation Plan, the applicant shall submit a fill settlement monitoring program detailing the types and locations of settlement monitoring stations, the frequency of monitoring observations, and the proposed rate of</p>

Environmental Topic	Summary of Previous Analysis
	settlement that may be deemed to be within acceptable limits for the construction of surface improvements, to the satisfaction of the City Engineer. Prior to final approval of any Phase 2 Improvement Plan elements (or permits for element construction), a Phase 2 Geotechnical Investigation shall be submitted to the City Engineer for review. This investigation shall document the extent of any remaining static or seismic settlement related to the fill (after the hill is formed) and would inform final design of the hilltop area and Phase 2 Improvement Plan elements, to ensure public safety.
Hazards & Hazardous Materials	As discussed in the <i>Rec Plan MND</i> , the site is not known or suspected to contain hazardous waste, debris or contaminated materials. All imported fill material is tested against regional water quality standards prior to import. All material imported to the quarry is considered clean fill.
Hydrology & Water Quality	<p>The <i>Rec Plan MND</i> identified no potentially significant impacts involving hydrology and water quality but included mitigation measures to address revegetation of the Phase 1 site area (Mitigation Measure 8: Revegetation) and a mitigation measure requiring compliance with the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharge Associated with Construction Activity. Both mitigation measures will be adopted as Conditions of Approval and implemented with the proposed project.</p> <p>It should be noted that Mitigation Measure 8: Revegetation addresses the Phase 1 area only, as surfacing for the Phase 2 area to facilitate its future use as a part of a regional park is required by the Reclamation plan. The exact type of surfacing needed for the Phase 2 area will need to be determined based its compatibility with the final cover material imported to the site (estimated to occur in 2034). As the surfacing of the Phase 2 area is a part of the Reclamation Plan project, no change to Mitigation Measure 8: Revegetation is necessary.</p>
Land Use/Planning	The proposed project continues to involve the construction of a regional park on the same site as was previously evaluated, which does not bisect an existing community.
Mineral Resources	Quarrying at the project site ceased in 2007. The quarry is at the end of its useful life and is undergoing reclamation. The purpose of this project is to amend the approved Reclamation Plan for purposes of recreating the hill topography that existed prior to mining activity. Therefore, the revised project will not have previously undisclosed impacts on mineral resources that would necessitate further environmental review.
Noise	As was discussed in the <i>Rec Plan MND</i> , the project site remains isolated and located on the western edge of the City of Fremont. Surrounding

Environmental Topic	Summary of Previous Analysis
	uses include San Francisco Bay, open space lands, and a vacant industrial site. There are no residential or sensitive uses in the vicinity of the site. The primary noise sources related to the proposed amendment to the Reclamation Plan would be from diesel trucks hauling and dumping material and from bulldozers pushing the fill material into place to re-create the hill. Only this limited truck and heavy machinery noise would result from the project, but is not expected to increase over past or existing conditions previously analyzed.
Population/Housing	The project does not involve construction of new housing, and proposed changes in the project are not expected to new job opportunities that would attract a significant number of new residents to the local area.
Public Services	Increasing the amount of fill brought to the project site will not increase demand for public services.
Recreation	The proposed project will provide new recreation opportunities rather than create demand for such opportunities, and the intent of the proposed changes in the project is to improve the experience of visitors to the park by providing a windbreak for the previously proposed campground facility.
Tribal Cultural Resources	No new land will be excavated or filled as a result of the proposed changes to the project.
Utilities/Service Systems	Increasing the amount of fill brought to the project site will not increase demand for utilities at the project site.

Air Quality and Greenhouse Gas Emissions

The analysis provided in the *Rec Plan MND* determined that the Reclamation Plan Amendment project would not cause significant impacts to air quality. As the revised project would include the transport of additional fill for the hill restoration, an Air Quality and Greenhouse Gas Emissions Study (*AQ Memo*, see Appendix C: *Dumbarton Quarry Project Air Quality and Greenhouse Gas Emissions Memo*) was prepared to evaluate the revised project.

Existing Conditions

As discussed in the *AQ Memo*, sources of air pollutant and greenhouse gas (GHG) emissions from the project include use of off-road (construction) equipment operating on-site and truck traffic that transports fill material to the project site. For on-site activities, the project includes the following equipment activity:

Table 1: Equipment Type and Activity

Equipment	Model Year	Horsepower	Estimated Typical Annual Hours
CAT D-10 Dozer	2017*	600	1,200
CAT 825 Compactor	2017*	405	1,600
CAT 14 Motor Grader	2015*	200	800

3800 Gallon Water Truck	2015*	--	1,600
Tymco Vacuum Sweeper	2015*	--	1,600
* Based on the model year, equipment is assumed to meet U.S. EPA Tier 4 standards (currently most stringent)			

Truck traffic varies from year to year. During the last three years, the quarry has received an average of about 72,000 annual truckloads of material (range = 66,173 - 75,584 trucks). This equates to 197 truckloads per average day. Based on the number of truckloads over the last three years and assuming ten cy/load, the quarry is currently importing about 720,000 cy annually. During 2017, there was an average of 181 trucks per day.

Proposed Project

As discussed in the *AQ Memo*, the proposed project would utilize the same, existing on-site equipment listed above. Currently, material can be placed at three locations at the quarry. With construction of the proposed hill, placement would only occur at one location. An estimated import of 400,000 to 437,500 cy per year over eight years (depending on material compaction) would be needed to restore the hill over the quarry pit. Truck traffic activity is estimated to decrease from an average of 181 trucks per day in 2017 to 168 trucks per day, assuming six days of operation per week, including a five percent contingency.

As discussed in the *AQ Memo*, on-site operations involving the handling of fill material and management of dust emissions are not anticipated to increase with the proposed project. With the reduced daily quantity of material to be imported to the site under the proposed project, the average truck trips per day and the use of on-site equipment would also be reduced. As proposed truck traffic and the use of on-site equipment would be proportional to the quantity of fill material imported, air pollutant, traffic and on-site activity would decrease by over 30 percent for seven-day/week operations and 19 percent for six-day/week operations (based on the overall project timeframe).

CEQA Checklist

The following subsection provides analysis of the proposed project revision in the context of the CEQA Guidelines checklist questions for Air Quality and Greenhouse Gas Emissions.

Air Quality (a). Would the project conflict with or obstruct implementation of the applicable air quality plan?

The most recent clean air plan is the *2017 Clean Air Plan* that was adopted by Bay Area Air Quality Management District (BAAQMD) in April 2017. The proposed project would not conflict with the latest clean air planning efforts because the project would not increase air pollutant emissions with respect to baseline conditions and the quarry would continue to operate in accordance with BAAQMD rules and regulations. There are no *2017 Clean Air Plan* measures that specifically apply to this project. No substantial project changes or circumstances are proposed and no new or more severe impacts would result than those that were previously identified in the *Rec Plan MND*. Thus, the impact would remain *Less-Than-Significant*.

Air Quality (b). Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The project would not increase emissions over existing conditions. Emissions are likely to decrease as the amount of material received at the quarry decreases in the future from an estimated 720,000 cy to 400,000 to 437,500 cy annually. This would result in a decrease in trucks traveling to the project and on-site use of construction equipment. Air pollutant emissions are estimated to be reduced by over 30 percent in comparison to existing conditions. As no substantial changes to the project or circumstances are proposed and there would be no new or more severe impacts than were previously identified, the impact would remain *Less-Than-Significant*.

Air Quality (c). Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable State or federal ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The Bay Area is considered a non-attainment area for ground-level ozone and fine particulate matter (PM_{2.5}) under both the Federal Clean Air Act and the California Clean Air Act. The area is also considered non-attainment for respirable particulate matter (PM₁₀) under the California Clean Air Act, but not the federal act. The area has attained both State and federal ambient air quality standards for carbon monoxide. As part of an effort to attain and maintain ambient air quality standards for ozone and PM₁₀, BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for ozone precursor pollutants (reactive organic gases or ROG and nitrogen oxides or NOX), PM₁₀, and PM_{2.5} and apply to both construction period and operational period impacts. The thresholds address increases in annual and average daily emissions caused by the operation of projects. As described above, the project would not increase average daily or annual emissions. No substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*. As such, the impact would remain *Less-Than-Significant*.

Air Quality (d). Would the project expose sensitive receptors to substantial pollutant concentrations?

Project impacts related to increased community risk can occur by introducing a new source of TACs and PM_{2.5} or increasing the amount of TACs and PM_{2.5} emitted from an existing source where there is the potential to adversely affect existing sensitive receptors in the project vicinity. BAAQMD recommends using a 1,000-foot screening radius around a project site for purposes of identifying community health risk from a new source of TACs and PM_{2.5}. Diesel-powered construction equipment and trucks are a source of TACs and PM_{2.5} emissions, so the quarry operations would be considered a source of TACs and PM_{2.5}. The health effects from these emissions are chronic in nature, i.e.,

causing increase lifetime cancer risk and an increased annual exposure to PM_{2.5}. There are no adverse community risk effects for short-term exposures.

As discussed under Checklist Question *Air Quality (b)*, the project would not increase the amount of on-site equipment usage or the amount of truck traffic. Therefore, emissions of TACs and PM_{2.5} would not increase and lead to increased health risks. Furthermore, the closest sensitive receptors to the quarry, which are residences, are well over 3,000 feet away. Additionally, much of the truck traffic accessing the quarry would be on Highway 84 from the west that is over 3,000 feet from residences in the area of the quarry. Low volumes of truck traffic would be dispersed on other roadways. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, there would continue to be *No Impact*.

Air Quality (e). *Would the project create objectionable odors affecting a substantial number of people?*

The project currently generates localized emissions of diesel exhaust during construction equipment operation and truck activity. This effect would not change with the project. These emissions may be noticeable from time to time at the site or along access roads. However, they are localized and do not adversely affect people off-site by resulting in confirmed odor complaints. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, there would continue to be *No Impact*.

Greenhouse Gas Emissions (a). *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

As discussed under Checklist Question *Air Quality (b)*, the reclamation activity at the project site is a source of air pollutant emissions. Likewise, it is a source of GHG emissions. The proposed project would not increase emissions of GHG. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, the impact would continue to be *Less-Than-Significant*.

Greenhouse Gas Emissions (b). *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?*

The proposed project would not conflict or otherwise interfere with the statewide GHG reduction measures identified in CARB's current Scoping Plan or City policies and plans to reduce GHG emissions. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, the impact would continue to be *Less-Than-Significant*.

Transportation/Traffic

The analysis provided in the *Rec Plan MND* determined that the Reclamation Plan Amendment project would not cause significant impacts to transportation/traffic. As the revised project would include the transport of additional fill for the hill restoration, a Transportation Analysis (Transportation Memo, see Appendix D: *Dumbarton Quarry Transportation Analysis*) was prepared to evaluate the revised project.

Existing Conditions

As discussed in the *Transportation Memo*, the quarry is currently receiving fill material, with a slight decline in operations over the past several years. The table below shows the daily average and annual total truck trips received by the quarry for the past three years.

Table 2: Trucks Served by Quarry

Year	Total Annual Trucks	Average Daily Trucks
2015	75,784	207
2016	74,178	203
2017	66,173	181

The original EIR for the quarry (*EIR 76-6*) assumed an average daily truck trip limit of 100 trucks per day, with peak single-day counts of 400 trucks. This assumption was carried through to the 1997 and 2011 Addendums. The 2012 Reclamation Plan Amendment restated this as a limit of 400 truck trips per day, without a daily average requirement, which helped result in the amendment's identification of no significant impacts. The 2012 Reclamation Plan Amendment concluded with a determination by the City of Fremont that a mitigated negative declaration would be prepared, with a continuation of the 1976 EIR mitigations to revegetate the site when possible and water the site to minimize dust.

The 2011 EIR Addendum and 2012 Reclamation Plan Amendment signified a change in operations to allow the import of material to the project site. This import was planned by the amendment to result in a flat plain across the project site at 36 feet above msl and was scheduled for completion in 2017.

Proposed Project

The proposed project revision would increase the permitted fill quantity by approximately four million cy, to a total of ten million cy, by constructing a hill at the quarry pit area, up to 165 feet above msl. Due to compaction of material and the challenge that comes in the measuring of the incoming fill per truck load at the gate, based on a certain volume per load, it is possible that additional fill material may be required to achieve the target hill elevation. Per condition of approval of the project, any increase of fill import beyond the ten million cy total may be allowed, strictly for the purpose of achieving the target elevation for the hill, subject to approval by the Planning Manager and City Engineer. It is estimated that the import of fill material for the purpose of re-creating the pre-mining hill topography would take at least eight years.

Based on an average of ten cubic yards per truck to haul four million cy of material six days per week, as allowed by the Hours of Operation adopted as a Condition of Approval of the project, then 168 trucks per day would be required, including a five percent contingency. Should the

overall project timeframe extend beyond eight years, even fewer trucks per day would be utilized. This is less than the 2012 Reclamation Plan Amendment's limit of 400 truck trips per day, and less than existing conditions, which averaged 181 trucks per day in 2017. The proposed project revision would result in no change to the routes the trucks take to deliver fill material to the project site.

CEQA Checklist

The following subsection provides analysis of the proposed project revision in the context of the CEQA Guidelines checklist questions for Traffic/Transportation.

Traffic/Transportation (a). Would the project exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

The proposed project revision would not increase the quantity of trucks delivering fill material to the site beyond what has previously been evaluated and would not exceed the capacity of the existing circulation system. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, the impact would remain *Less-Than-Significant*.

Traffic/Transportation (b). Would the project conflict with an applicable congestion management program, including, but not limited to a level of service standard, standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

The proposed project revision would not increase the quantity of trucks delivering fill material to the site beyond what has previously been evaluated and would not exceed the capacity of the existing circulation system. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, the impact would remain *Less-Than-Significant*.

Traffic/Transportation (c). Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The proposed project revision would result in no changes in air traffic patterns or air traffic levels. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, there would continue to be *No Impact*.

Traffic/Transportation (d). Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project revision involves no new routing or design features that would increase hazards. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, there would continue to be *No Impact*.

Traffic/Transportation (e). Would the project result in inadequate emergency access?

The proposed project revision involves no increase in traffic to or from the site and would not result in inadequate emergency access. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, there would continue to be *No Impact*.

Traffic/Transportation (f). Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The proposed project revision involves no increase to the number of trucks delivering fill material to the site and would not conflict with adopted policies related to alternative transportation. As no substantial changes to the project or circumstances are proposed and no new or more severe impacts would occur than those that were previously identified in the *Rec Plan MND*, there would continue to be *No Impact*.

Basis for Decision to Prepare an Addendum

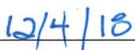
The proposed project would not result in any of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent MND/EIR. As outlined above, the updated air quality and traffic operation analyses did not identify any new or more severe significant impacts, and no new mitigation measures would be required. The project, as modified, would not increase the previously analyzed quantity of truck trips to the site.

The proposed project modifications would not constitute substantial changes to the project or the project circumstances, which would require major revisions to the *Rec Plan MND* due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The previously adopted *Rec Plan MND* did not decline to adopt mitigation measures that would have reduced one or more significant effects. There have been no other changes, evidence or new information which would require revisions to the *Rec Plan MND*. Since none of the criterion in CEQA Guidelines Section 15162 has been met, an Addendum is the appropriate CEQA document.

As required by Public Resources Code Section 21081.6(a)(1), the 2012 Mitigation Monitoring and Reporting Program (MMRP) for the *Rec Plan MND* was adopted as part of the previous project approvals. All mitigation measures set forth in the 2012 Mitigation Monitoring and Reporting Program, except as modified herein, would apply to the project thereto.



Kristie Wheeler, Planning Manager
City of Fremont



Date