

# **South San Francisco Bay Shoreline Phase I Study**

## **Addendum No. 5 to the Final Environmental Impact Statement/ Environmental Impact Report**

State Clearinghouse No. 2006012020

Valley Water Project No. 26444001

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## Table of Contents

1. Background .....	5
2. CEQA Considerations .....	8
3. Description of Proposed Changes to the Project .....	9
Air Quality and Greenhouse Gases .....	13
Noise .....	15
Transportation .....	16
5. Conclusion .....	18
6. References .....	19

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# 1. Background

On March 22, 2016, the Santa Clara Valley Water District (Valley Water) approved the South San Francisco Bay Shoreline Phase I Study (project) after certifying an Environmental Impact Report (EIR) for the project. The document titled Final Integrated Interim Feasibility Study and Environmental Impact Statement/Environmental Impact Report ("Final EIS/EIR", SCH NO. 2006012020) was prepared as a joint environmental review document to comply with the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA). The project is undertaken as a partnership with federal and state agencies, including the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS) and the California State Coastal Conservancy to provide coastal flood protection, restore/enhance tidal marsh and related habitats, and provide recreational and public access opportunities. The USACE and the USFWS acted as the co-lead agencies under NEPA, and Valley Water acted as the lead agency under CEQA. The USACE is responsible for design and construction of this project and Valley Water is responsible for obtaining necessary rights of way and temporary work area easement for construction. Valley Water is also responsible for a portion of the overall project cost.

The area between Alviso Slough and Coyote Creek has considerable risk for coastal flooding due to its low-lying terrain protected by non-engineered dikes. The flood risk will substantially increase over the next several decades due to sea level rise. In addition to flood risk, the past creation of commercial salt harvesting ponds along southern San Francisco Bay has resulted in a loss of most of the tidal salt marsh habitat within the Study Area. The Study Area is shown in Figure 1. These local tidal marsh losses are in addition to San Francisco estuary-wide losses of approximately 90 percent of all tidal wetlands.

The project would provide coastal flood protection to the community of Alviso and infrastructure between Alviso Slough and Coyote Creek. The flood protection levee will allow approximately 2,900 acres of former salt ponds to be restored to tidal marsh by breaching levees to San Francisco Bay. The new levees will be used as a trail and include connection to the Bay Trail network with viewing platforms, interpretive signs, and benches.

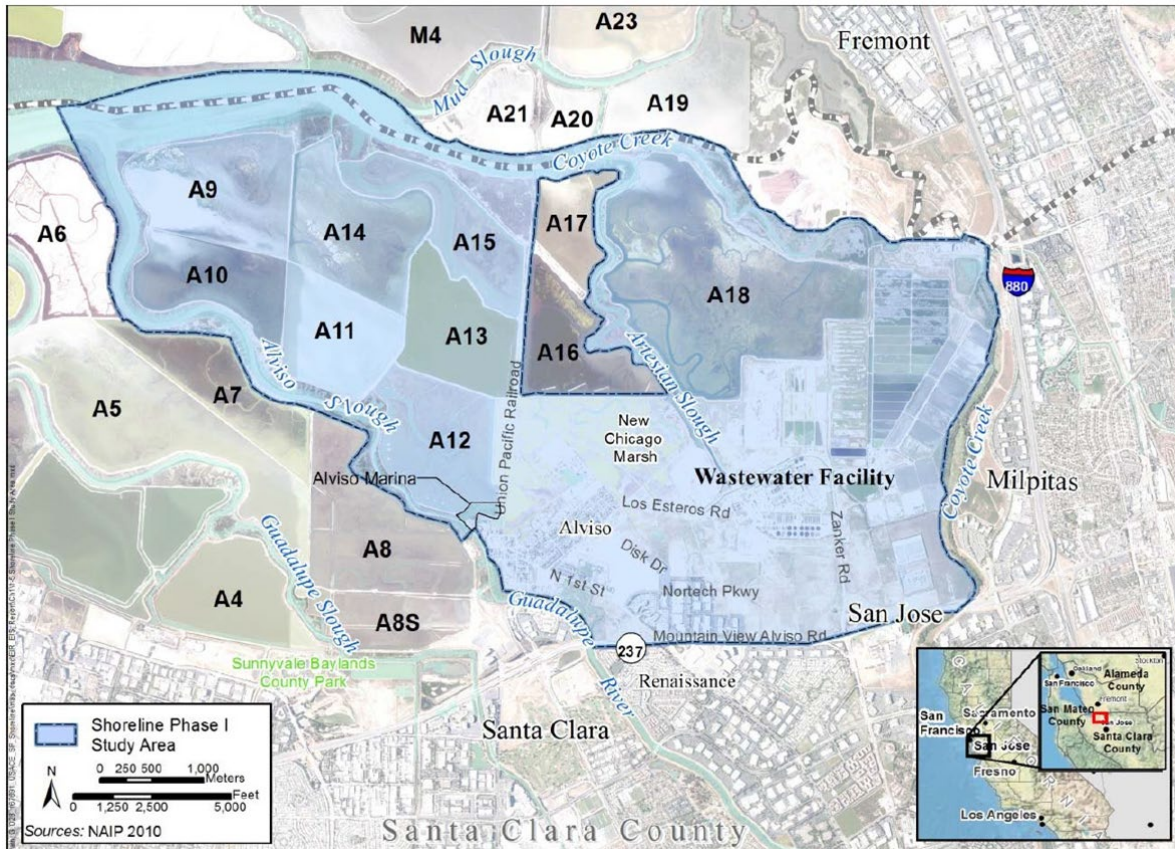
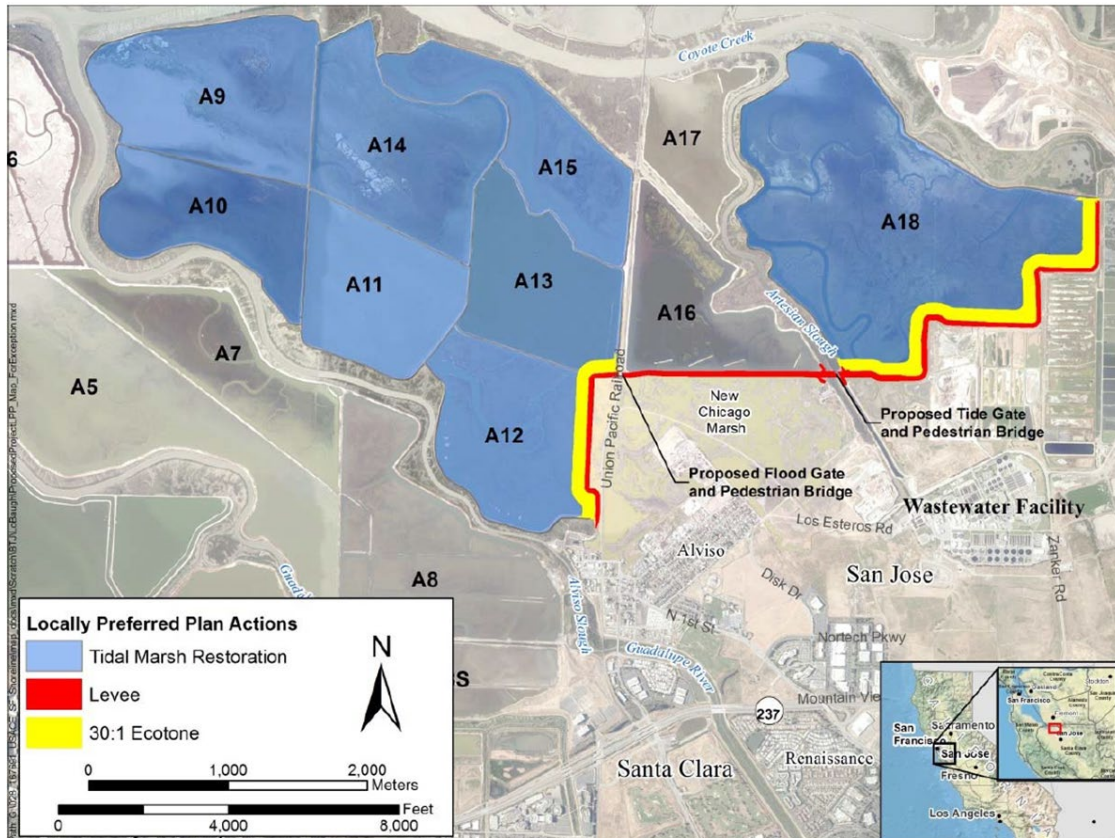


Figure 1: South San Francisco Bay Shoreline Phase 1 Study Area – Alviso Subarea within Santa Clara County

### **Approved Project Elements**

The project, as approved, includes the construction of an engineered levee, restoration of Ponds A9-A15 and A18, tide gates, and pedestrian bridges shown in Figure 2. The project area consists of Reaches 1, 2, 3, 4, and 5 shown in Figure 3. The new levee would be constructed up to an elevation of 15.2 feet (NAVD 88) along existing salt pond berms – the eastern border of Pond A12 and southern borders of Ponds A13, A16, and A18. Additional flood risk management (FRM) features include a flood gate for the Union Pacific Railroad crossing and a gate closure system at Artesian Slough (Artesian Slough Crossing). Restoration at Ponds A9-A15 and A18 would consist of breaching existing salt pond berms, guided by results of monitoring and adaptive management from other South Bay restoration activities, to establish tidal connection with San Francisco Bay. An average 30:1 ecotone would be built adjacent to the levee in Ponds A12, A13 and A18, which would provide transitional habitat for endangered species. Recreation features include two pedestrian bridges, access to an unpaved trail on the improved levees, connection of the new levee trail to the Bay Trail network, and viewing platforms, interpretive signs, and benches. The major elements and environmental impacts of the project are detailed in the Final EIS/EIR that was certified by the Valley Water Board of Directors on March 22, 2016.





## **Additional Environmental Review**

The project description in the Final EIS/EIR was based on 30 percent design plans available when Valley Water certified the CEQA document and approved the project. In March 2019, Valley Water prepared an Addendum No. 1 to the Final EIS/EIR to evaluate minor design changes to the approved project reflected in the 95 percent design plans for Reach 1 (Alviso Marina County Park to the Union Pacific Railroad), as well as other minor modifications to project schedule and activities, to support approval of a purchase and sale agreement (Purchase and Sale Agreement) between Valley Water and County of Santa Clara (County) for Valley Water to obtain temporary use of County property for project construction.

In August 2019, Valley Water prepared Addendum No. 2 to the Final EIS/EIR to evaluate minor changes to the approved project in Reach 1, 2, and 3. Addendum No. 2 evaluated the addition of two new staging areas in the study area. No ground disturbing or soil stockpiling/hauling activities were proposed at those two new staging areas. Only equipment storage, and temporary placement of a construction trailer were proposed at the two new staging areas.

In March 2020, Addendum No. 3 was prepared to evaluate the environmental impacts of the acquisition of an additional temporary work area easement and two ingress/egress easements. The ingress/egress easements would provide additional access for construction and maintenance activities associated with Pond A18 and the Artesian Slough Crossing. The additional work area was required to facilitate construction of the Artesian Slough Crossing element.

Addendum No. 4 was prepared and approved in November 2020. Addendum No. 4 evaluated the environmental impacts of minor changes to the design, construction, and operation of the project including removal and replacement of an existing force main and culverts in Reach 1, installation of a sacrificial berm, extension of truck hauling and construction during peak hours, reduction in buffer distance for the western snowy plover (*Charadrius nivosus*), placement of chain-link fabric, and updates to Reaches 1, 2, and 3 construction schedule within Alviso Marina County Park.

Since the preparation of Addendum No. 4, the project partners have developed an alternative haul route that would allow for more efficient construction and identified a need to revise a segment of a previously approved haul route, as described in more details below. This Addendum No. 5 was prepared to evaluate the environmental impacts associated with these proposed changes.

## **2. CEQA Considerations**

Once the environmental review for a project has been conducted and the lead agency has adopted its findings with respect to impacts and proposed mitigation, these decisions need no additional review, unless further discretionary approval on that project is required and there are substantial changes to the project or its circumstances (CEQA Guidelines §15162 (c)).

When there are changes to a project, CEQA and its implementing regulations provide various levels of review to document that the lead agency has adequately considered the environmental effects of the changes in making its decisions. Under CEQA Guidelines §15162(a), the appropriate level of review is based, among other factors, on whether proposed changes to the project, changes to circumstances under which the project is undertaken, or new information of substantial importance that was not known at the time of approval of the project, would create or show new significant effects or a substantial increase in the severity of previously identified significant effects.



If project changes would not result in new significant impacts or a substantial increase in severity of a previously identified significant impact, CEQA Guidelines §15164(a) provide for the use of an Addendum. The lead agency's decision to use an Addendum must be supported by substantial evidence that the conditions that would trigger the preparation of a Subsequent EIR, as provided in CEQA Guidelines §15162, are not present.

### **3. Description of Proposed Changes to the Project**

On page 3-85 of the Final EIS/EIR, Figure 3.8-2 shows proposed staging areas and ingress/egress routes for haul trucks to reach and exit from the various project areas. On page 4-447 of the Final EIS/EIR, the construction access (truck hauling) routes are further described. Three potential truck hauling access routes were identified: (a) Trucks would enter Staging Areas No. 1 and No. 2 via Dixon Landing Road and a private access road off of McCarthy Boulevard and would exit via Zanker Road; (b) Trucks would access Pond A18 directly via Zanker Road, travel north along Los Esteros Boulevard, use an established easement north of the Wastewater Facility to drop off the fill materials, and exit the site via Zanker Road; and (c) Trucks would access Staging Areas No. 3 and No. 4 via North First Street through Alviso and the Marina parking lot.

Pursuant to Addendum No. 1 which was prepared in March 2019, the haul route to Reach 1 and Reach 2/3 was revised such that haul trucks would access Reaches 1,2, and 3 via State Route 237 to the Lafayette Street/Great America Parkway, the Gold Street Connector to Gold Street, continuing on to Elizabeth Street, then to Hope Street and into the Alviso Marina County Park. Empty haul trucks would exit in the reverse order but may access State Route 237 via Great America Way to Great America Parkway. This amended haul route would entirely avoid adding truck trips to North First Street along which community facilities such as library, fire station, and elementary school are located. The approved haul routes, as described in the final EIS/EIR and further amended through Addendum No. 1, are shown in Figure 4.

Subsequent to Addendum No. 4 which was prepared in November 2020, the USACE has identified an alternative haul route along Grand Boulevard that would shorten the travel distance between Reach 1 site at the Alviso Marina and Reaches 2 and 3 site at the Don Edwards San Francisco Bay National Wildlife Refuge Environmental Educational Center (EEC). Figure 5 shows a comparison between the previously approved and currently proposed routes.

In addition, while evaluating the proposed alternative haul route as described above, Valley Water became aware that it would be infeasible to implement one segment of a previously approved haul route to access Staging Area No. 3 and the Reaches 2 and 3 site at EEC. Specifically, the Final EIS/EIR and subsequent addenda have assumed that the Reaches 2 and 3 site and Staging Area No. 3 would be accessible from the Zanker Landfill entrance. However, the Staging Area No. 3 can only be accessed through Grand Boulevard. Thus, that segment of the haul route would need to be amended. Figure 6 shows a comparison between the previously approved and currently proposed routes. The environmental analysis of these two proposed changes will be discussed separately below.



Figure 4: Approved haul routes amended by subsequent addenda.

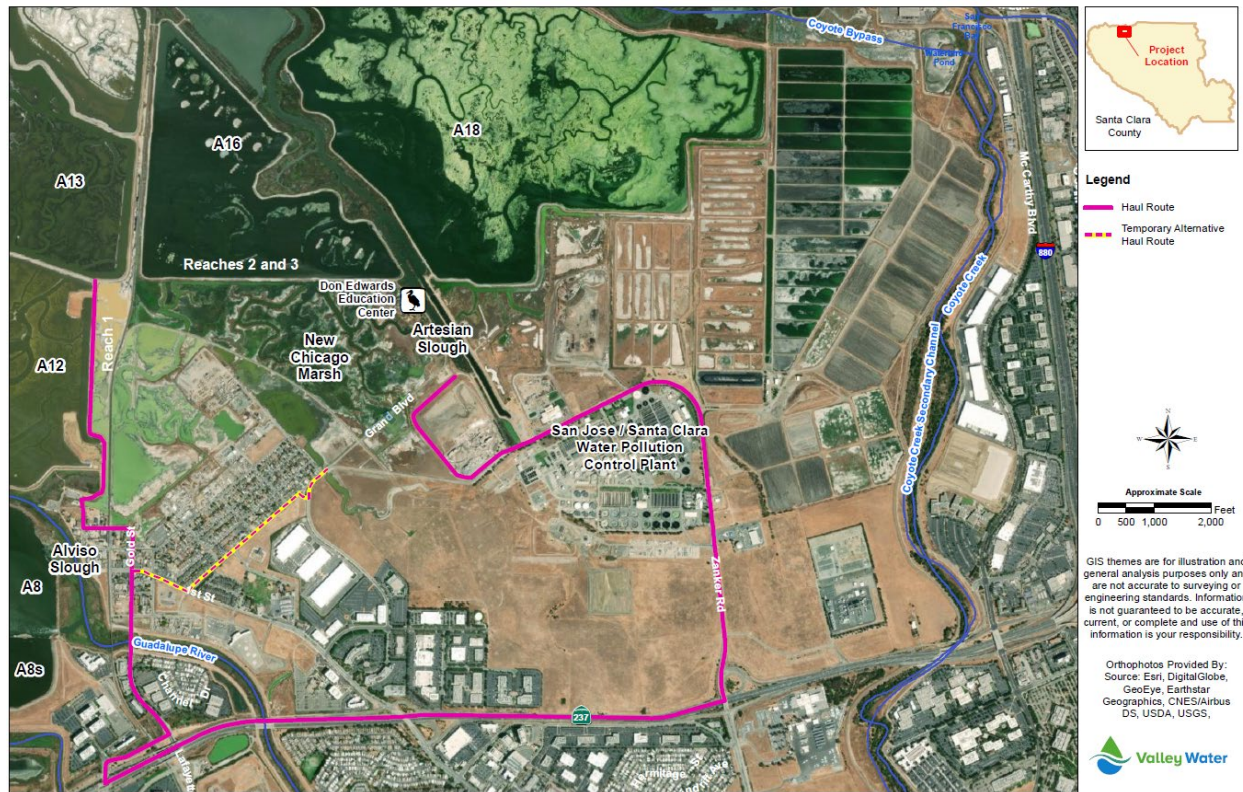


Figure 5: Temporary alternative haul route along Grand Boulevard shown in yellow dashed line.





Figure 6: Revised haul route allowing construction access to Staging Area No. 3 and Reaches 2 and 3 site.

## 4. Environmental Analysis

### 4A) Minor Revision to Haul Route Allowing Construction Access to Staging Area No. 3 and Reaches 2 and 3 Site

As shown in Figure 6 the previously approved haul route provides for construction vehicles accessing Pond A18 and the Reaches 2 and 3 site via Zanker Road, to Los Esteros Road, and through an established easement north of the Wastewater Facility to drop off fill material. As proposed, the Reaches 2 and 3 site and Staging Area No. 3 would be accessed through Los Esteros Road and then north along Grand Boulevard which is an access road to the EEC. The construction access route along Grand Boulevard would be slightly longer (approximately 0.71 miles) than the route shown in previous environmental review documents. However, changing the haul route would not result in any change in impacts on most of the resource areas (including mineral resources, geology/soils, land use and planning, hydrology, water quality, biological resources, hazards and hazardous materials, recreation, aesthetics, public health, cultural resources, and public utilities and service systems) because the haul route, as revised and if approved, would not change any construction activities other than utilizing a slightly different path to transport materials in and out of the project sites. With respect to air quality, since the modified route is only slightly longer than the previous route and no additional truck trips are proposed, this project modification would not result in substantially worse air quality impacts relating to air pollutant/greenhouse gas emissions or odors. Accessing the project sites through the revised route would result in similar traffic impacts compared to the approved project, because no additional truck trips are proposed and the amended route does not include roadways that are

susceptible to traffic congestion. With respect to noise impacts, because as revised, the haul trucks would be driving through the same industrial area (near the landfill) and no additional truck trips are proposed, implementation of the revised route would not substantially increase any temporary noise impacts or expose sensitive receptors to increased noise. Finally, to avoid and minimize project impacts, the USACE and/or its contractors would continue to implement the same applicable best management practices (BMPs) and avoidance and minimization measures (AMMs) as prescribed in the Final EIS/EIR during the use of the revised haul route, and thus this proposed minor project change would not result in new or substantially worse significant impacts.

#### ***4B) Alternative Haul Route Segment***

As previously approved, construction vehicles would haul excavated material from Reaches 2 and 3 to Pond A12 in Reach 1 by following the path shown in Figure 4. The proposed modification to add an alternative haul route, which is shown in Figure 5, would allow contractors to drive approximately 0.65 miles on Grand Boulevard through a residential neighborhood for hauling of excavated material from Reaches 2 and 3 to Pond A12 in Reach 1. The inclusion of the proposed haul route segment along Grand Boulevard would give the contractor the option to use the alternative route during the decommissioning of the existing Reaches 2 to 3 levee, which would take 90 to 120 days to complete. Thus, the use of this alternative haul route would be limited to four months. Specifically, the project modifications would route the trucks from the Reach 1 site to south of Hope Street, left on Elizabeth Street to Gold Street, then left on North First Street to Grand Boulevard and on to the Reaches 2 to 3 site. The alternative haul route would also be used in reverse directions. This alternative haul route would reduce truck delivery time and hauling distance between Reaches 2 to 3 site and Pond A12.

The following analysis discusses the potential impacts from the proposed changes to add an alternative haul route between the Reaches 2 to 3 site and Pond A12.

Implementation of the alternative haul route during a four month period would not create new or substantially worse significant impacts on agricultural/forest resources or mineral resources as these resources are not found to be located in the vicinity of proposed work area. It would also not create new or substantially worse impacts in the resource areas relating to aesthetics, biological resources, cultural resources, geology, soils and seismicity; hazards and hazardous Material; hydrology and flood risk management; land use and planning; public safety and aviation; public utilities and service Systems; surface water and sediment quality; recreation, and growth Inducement, because the construction activities (other than the minor modifications in haul routes) and the duration of project construction would not substantially change compared to the project as evaluated in the Final EIS/EIR. In addition, the USACE and/or its contractors would continue to implement the same applicable best management practices (BMPs) and avoidance and minimization measures as prescribed in the Final EIS/EIR when using the alternative haul route.

Potential impacts from implementing the alternative haul route to air quality/greenhouse gases, noise, and transportation are further analyzed below because truck hauling through a small distance (0.65 miles) along a residential area during a four month period could potentially increase these impacts to the communities residing in this area.

## **Air Quality and Greenhouse Gases**

### **Impact AIR-1: Violate any air quality standard or contribute substantially to an existing or projected air quality violation**

According to the Final EIS/EIR on page 4-489, project construction would result in temporary increase in emissions of ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO<sub>2</sub>. Construction emissions were quantified using CalEEMod. The Final EIS/EIR finds that the ROG and NO<sub>x</sub> emissions during construction would exceed BAAQMD emission thresholds for maximum pounds per day from the large amount of material to be moved and placed to form new levees and transitional habitat. The Final EIS/EIR concludes that implementation of Mitigation Measure M-AIR-1a and Mitigation Measure M-AIR-1b would reduce the ROG and NO<sub>x</sub> emissions during construction. Implementation of Mitigation Measure M-AIR-1a would require the contractor to develop a plan demonstrating that off-road equipment would achieve project-wide fleet average of 20 percent NO<sub>x</sub> reduction and 45 percent PM reduction compared to the Air Resources Board fleet average. In addition, implementation of Mitigation Measure M-AIR-1b requires all construction equipment, diesel trucks, and generators be equipped with best available control technology and all equipment meeting the Air Resources Board's most recent certification standard for off-road heavy-duty diesel engine. On page 4-491 of the Final EIS/EIR, NO<sub>x</sub> and ROG emissions associated with levee construction and ecotone activities would be considered significant after mitigation. The impact was concluded to be significant and unavoidable.

This project change to add an alternative haul route does not add new construction or project activities beyond those already evaluated in the Final EIS/EIR, and no additional truck trips are proposed. Thus, no change in emissions from equipment and truck trips during construction would occur if the alternative route is used.

Following the shorter alternative route for transport of materials during a four month period would reduce the overall amount of vehicle emissions during that period of time. The alternative haul route is approximately shorter by 4.7 miles than the haul route evaluated in the Final EIS/EIR. The alternative haul route would allow trucks to travel a shorter distance to reach the construction sites. Therefore, overall air quality emissions associated with truck hauling activities during Reach 1 to 3 construction would be reduced. The proposed alternative haul route would result in emissions less than the amount estimated in the Final EIS/EIR. While trucks would drive through a residential neighborhood, this alternative route would only be used for four months and would not expose the community to a substantial increase in air pollutants. In addition, USACE and/or its contractors will continue to implement AMM AIR-1: Dust Control Measures and AMM AIR-3: Prepare SWPPP, as well as Mitigation Measures M-AIR-1a and M-AIR-1b, to reduce construction-related impacts. The proposed alternative haul route would not result in substantially worse air quality impacts relating to ROG, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO<sub>2</sub> emissions.

### **Impact AIR-2: Expose sensitive receptors to substantial pollution concentrations**

As discussed in the Final EIS/EIR on page 4-491, the project impacts relating to exposure of Toxic Air Contaminants (TAC) to sensitive receptors would be less than significant. As described in Impact AIR-1 above, the proposed project changes would reduce the overall air pollutant emissions during the four month period. While taking the alternative route would result in trucks passing through approximately 0.65 mile of residential areas on Grand Boulevard, the original route described in the Final EIS/EIR would have resulted in exposure of air emissions to a larger number of residences. In addition, USACE will continue to implement AMM-AIR-2: Limit Idling Time, AMM-AIR-5: Cleaner Construction Equipment, and AMM-AIR-6: Use Electrical Power, and

Mitigation Measure M-AIR-1a and Mitigation Measure M-AIR-1b to further reduce diesel PM exhaust emissions. Therefore, impacts from the proposed project changes would remain less than significant as evaluated in the Final EIS/EIR.

**Impact AIR-3: Conflict with or obstruct implementation of the applicable air quality plan**

As discussed on pg. 4-491 of the Final EIS/EIR, a project would be inconsistent with an air quality plan if it would result in population and/or employment growth that exceed growth estimates included in the plan, which would generate emissions not accounted for. Both the approved and modified project would not result in population or employment growth, and thus there would be no conflict with, or obstruction of, air quality plans. This impact would remain less than significant.

**Impact AIR-4: Create objectionable odors affecting a substantial number of people**

According to page 4-491, the project would generate odors associated with diesel exhaust and other construction-related sources. The project site is located approximately 50 feet from the Alviso Marina County Park, 500 feet from residential neighborhoods, and 200 feet from commercial development. The contractor would limit idle time for diesel-powered equipment which would minimize construction-related odor. Implementation of AMM-AIR-2, AMM-AIR-5, and AMM-AIR-6 would reduce overall construction-related odors. Based on the distances, and the short-term nature of potential odors to be generated, the Final EIS/EIR concludes this impact to be less than significant. Generally, construction related odors are caused by use of construction equipment and material stockpiling activities. No additional stockpiling or use of construction equipment are proposed. The proposed alternative haul route would not result in additional truck trips or construction activities. Other project activities would remain similar in location, nature, and duration of work activities, and the USACE and/or its contractors would continue to comply with applicable AMMs and MMs during project construction. Thus, the proposed use of the alternative haul route would not create substantial increase in odors affecting people. Therefore, the impact related to objectionable odors would remain less than significant.

**Impact AIR-5: Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases**

On page 4-493 of the Final EIS/EIR, the majority of GHG emissions generated from the project would be CO<sub>2</sub>. GHG emissions are estimated to be a maximum of 94,267 lb./day for the levee and Pond A12 transitional habitat construction phase. BMPs identified by the BAAQMD to reduce GHG emissions during construction include using alternatively fueled construction equipment for at least 15 percent of the fleet, using local building materials for at least 10 percent of the total, and recycling or reusing at least 50 percent of construction waste or demolition materials. The Final EIS/EIR states that the BMPs would reduce project impacts to GHG to a less than significant level. As described in the other air quality impact discussions above, the alternative haul route would reduce the overall amount of GHG emissions because of the shorter truck trip distance. Implementation of AMM-AIR-4: Greenhouse Gas BMPs would reduce GHG emissions during construction by requiring the contractor to use alternatively fueled construction equipment for at least 15 percent of the fleet, use local building materials for at least 10 percent of the total, and recycle or reuse at least 50 percent of construction waste or demolition material. Therefore, this impact to GHG emissions would remain less than significant.



## Noise

**Impact NOI-1: Expose people to or generate noise levels in excess of standards established in the City of San José's municipal code for land inside the city limits or the Santa Clara County Code standards for land in unincorporated areas of Santa Clara County**

**Impact NOI-2: A substantial temporary or periodic increase in ambient noise levels in the project vicinity due to construction activities**

According to page 4-579, project construction-related noise would exceed the local noise standards and result in significant temporary increase in ambient noise. The modified project would not propose additional truck trips, construction activities, and equipment. As discussed on page 4-579 of the Final EIS/EIR, truck hauling activities would not be substantial enough to increase ambient noise levels along these routes. The Final EIS/EIR concluded that the impact from haul route traffic for soil importing would be less than significant.

The alternative haul route would use approximately 0.65 miles of an existing residential street (Grand Boulevard) to connect the Reach 1 site to the Staging Area No. 3 and Reaches 2 and 3 site. The alternative haul route would be used for the duration of Reaches 2 to 3 levee decommissioning construction, whereby the excavated Reaches 2 and 3 levee material would be hauled to Reach 1 site and placed within Pond A12 stockpile. Truck hauling activities occurring along Grand Boulevard would generate ambient noise for a four month period. The truck hauling hours would remain the same as evaluated in Addendum No. 4. Similar to the already approved project and as concluded in the Final EIS/EIR, truck hauling activities would not substantially increase ambient noise levels along the haul routes including the proposed alternative route. Implementation of AMM-NOI-3: Noise BMPs and Mitigation Measure M-NOI-1 would reduce construction-related noise impacts during implementation of the proposed alternative haul route. These measures would require the contractor to implement BMPs to reduce noise, obtain a conditional use permit from the city, and comply with all provisions of the conditional use permit. The conditional use permit is expected to include time-of-day restrictions, equipment setback requirements, notification requirements, equipment maintenance, and equipment muffler requirements. The contractor is further required to monitor construction noise levels, and if noise levels exceed the permitted levels, the contractor will reduce the number of noise-generating equipment at any one time or install temporary noise barriers. Therefore, this impact would remain less than significant with mitigation.

**Impact NOI-3: Expose people to or generate excessive ground-borne vibration or ground-borne noise levels**

The Final EIS/EIR discusses on pg. 4-579 that low to moderate levels of ground-borne vibration could be produced during construction activities. Heavy equipment use and pile driving would produce the highest levels of ground-borne vibration. Ground-borne vibration dissipates rapidly with distance from the source, and, because the nearest sensitive residential receiver would be about 500 feet from the construction area, ground-borne vibration produced during construction would dissipate to below background levels before reaching the sensitive receivers. No additional construction activities or truck trips are proposed. While the alternative haul route would include the use of an existing residential road along Grand Boulevard, the truck trips through the

residential area would not substantially increase the exposure of people to excessive ground-borne vibration or ground-borne noise levels. Therefore, construction-generated vibration and ground-borne noise impact would remain less than significant.

**Impact NOI-4: A substantial permanent increase in ambient noise levels or vibration in the project vicinity above existing levels without the project**

The proposed project changes would not result in a substantial permanent increase in ambient noise levels or vibrations in the project vicinity above existing levels without the project. The proposed project changes would not result in a substantial increase in ground-disturbing activities. The alternative haul route would be limited to four months, throughout the duration of the Reaches 2 and 3 levee decommissioning construction. No additional construction activities or truck trips are proposed beyond those evaluated in the Final EIS/EIR. Truck hauling activities and work hours would remain consistent with city and local ordinances. Therefore, impacts relating to permanent increase in ambient noise levels or vibration from the project modifications would remain less than significant.

**Impact NOI-5: Exposure of people residing or working in the study area to excessive aircraft-generated noise levels**

The proposed alternative haul route would not result in any changes to exposure of people residing or working near the project sites to excessive aircraft-generated noise levels.

## **Transportation**

**Impact TRN-1: Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit; or conflict with congestion management program standards and goals for freeway segments listed in Section 4.9.1 Affected Environment.**

According to the Final EIS/EIR on page 4-456, project construction would result in temporary increases in traffic volumes on area roadways and would cause short-term degradation of traffic level of service at intersections and freeway segments. As described on page 4-448 in the Final EIS/EIR, the project would generate a maximum of 320 daily truck trips for levee construction, 360 daily truck trips for Pond A12 restoration, and 220 daily truck trips for Pond A18 restoration. This addendum addresses the impacts associated with the clarification to Staging Area No. 3 and Reaches 2 and 3 construction access route and the proposed alternative haul route along Grand Boulevard. To access sites west of Artesian Slough, trucks would travel along Zanker Road, to Los Esteros Road and Grand Boulevard. Traffic impacts associated with access to Staging Area No. 3 and Reaches 2 and 3 site have already been analyzed. The construction access route would be limited to four months, throughout the duration of Reaches 2 and 3 levee decommissioning. As described on page 4-448 in the Final EIS/EIR, the project would generate temporary increases in traffic volumes along Grand Boulevard and Los Esteros Road.

The proposed change would provide the contractor an alternative haul route to access the construction sites. The alternative haul route is approximately 0.65 miles long along Grand

Boulevard. The alternative haul route would connect the Reach 1 site to the Reaches 2 and 3 site. The haul route would be an alternative option for the contractor to use to access the site at a shorter distance. This would allow on-site fill delivery to occur at a shorter distance and time. The proposed change would result in temporary increase in traffic volumes along Grand Boulevard. The alternative haul route would be limited to four months, throughout the duration of the decommissioning of Reaches 2 and 3 levee. As described in Addendum No. 3, truck hauling activities would occur during work hours from 7:00 AM to 5:30 PM. The level of service (LOS) along Grand Boulevard in the project site is unknown. However, the Final EIS/EIR determined the nearby study intersections are operating at an acceptable LOS of LOS C or better during both peak hours. According to page 4-435 of the Final EIS/EIR, the Highway 237, to Zanker Road to North First Street mixed-flow freeway segment operates at an unacceptable LOS F during PM hours. The alternative haul route would provide the contractor the option to use Grand Boulevard haul route in addition to the haul route along Highway 237. Although truck hauling would primary occur outside AM and PM Peak hours, the use of the alternative haul route would reduce overall truck trips traveled along Highway 237. Therefore, the proposed change would alleviate some traffic at along the Highway 237 freeway segment. Similar other nearby study intersections, the addition of construction traffic would not substantially degrade LOS at the Grand Boulevard intersections. As described on page 4-456 of the Final EIS/EIR, all study intersections would continue to operate at an acceptable LOS D or better with additional construction traffic. The proposed project changes would be substantially similar in terms of nature, location, and duration of the work activities to the approved project. The proposed changes would not exceed jurisdictional specific impact thresholds or significantly degrade roadway performance. Therefore, the proposed change would not result in new or substantially worse significant impacts on transportation resource beyond those evaluated in the Final EIS/EIR.

**Impact TRN-2: Substantially increase hazards related to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., slow-moving construction equipment)**

The alternative haul route would allow trucks to enter and exit the project sites through an existing residential road. The project change would not change any design features of the existing road. Implementation of AMM-TRN-3: Traffic Control Plan would require the contractor to prepare and implement a traffic control plan to ensure trucks and other construction vehicles can safely enter and exit public roads when accessing the construction site. The proposed change would not increase the total maximum daily truck trips evaluated in the Final EIS/EIR and would not increase hazards related to a design feature of incompatible use. Since Grand Boulevard is maintained by the City of San José, the use of the alternative haul route would be coordinated with the City's Department of Transportation. Therefore, the proposed change would not result in new or substantially worse significant impacts on transportation beyond those evaluated in the Final EIS/EIR.

**Impact TRN-3: Result in inadequate emergency access to areas that are near the project and that rely on the same transportation facilities.**

As described on page 4-460, slow-moving construction equipment would stay within the active work area and would not normally use public roads. A traffic control plan would be prepared by the contractor to ensure vehicles have a safe ingress and egress from public road. Construction work would be staged and conducted well away from public roads and would therefore not impact emergency access. No additional construction work or truck trips are proposed. Implementation of AMM-TRN-3: Traffic Control Plan would ensure trucks and other construction vehicles can safely enter and exit public roads when accessing the construction site. The added alternative

route would not impact emergency access. Therefore, the proposed change would not result in new or substantially worse significant impacts on emergency access beyond those evaluated in the Final EIS/EIR.

**Impact TRN-4: Conflict with the City of San José, Santa Clara County, or Alameda County adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.**

According to page 4-460 of the Final EIS/EIR, the project would not generate additional pedestrian, bicycle, or transit-oriented trips. The project is anticipated to generate construction-related truck and worker traffic that would be temporary in nature and would only last for the duration of the construction activity. As described in the Final EIS/EIR, construction activities would occur within the project boundaries, and no lane or road closure would occur on any public roadways as a result of construction or operation of the project. The proposed project change to add an alternative route would not generate additional construction-related truck and worker traffic. The proposed change would allow truck hauling activities to occur along Grand Boulevard. No truck trips would occur outside the project boundaries. Truck hauling activities along Grand Boulevard would not conflict with pedestrian, bicycle, or bus transit facilities. The USACE and/or its contractor would continue to implement AMM-TRN-2 to coordinate with Union Pacific Railroad and rail transit providers to confirm peak rail traffic hours and cooperatively establish speed and traffic restrictions for rail and truck activities during construction. The proposed change would not result in new or substantially worse significant impacts on transportation beyond those evaluated in the Final EIS/EIR.

## **5. Conclusion**

Based on the analysis above, none of the conditions described in CEQA Guidelines §15162 would occur as a result of the proposed project changes. The proposed changes described in this addendum would not create new significant environmental impacts or substantially increase the severity of the previously identified impacts. There are no significant changes to the project circumstances, and there is no new information of substantial importance requiring revisions of the previous CEQA findings. Therefore, Valley Water, as Lead Agency has determined that the addendum to the South San Francisco Bay Shoreline Phase I Study Final EIS/EIR is the appropriate level of review under CEQA Guidelines §15164.

## 6. References

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USFWS, 2015. South Bay Shoreline Flood Risk Management Project Biological Opinion for USACE. April 15, 2015.

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Valley Water, 2020.

South San Francisco Bay Shoreline Phase I Study Addendum No. 4. Amended November 2020.