

#### **ADDENDUM TO THE**

## Riverbank Regional Recycled Water Project Initial Study/Mitigated Negative Declaration

Prepared for:



City of Riverbank 6707 3<sup>rd</sup> Street Riverbank, CA 95367

February 2025

# Addendum to the Riverbank Regional Recycled Water Project Initial Study/Mitigated Negative Declaration

Prepared for: City of Riverbank 6707 3rd Street Riverbank, CA 95367

Prepared by:



Ascent Environmental 455 Capitol Mall, Suite 300 Sacramento, CA 95814

February 2025

#### TABLE OF CONTENTS

Section		Page
1 ADDE	NDUM TO THE RIVERBANK REGIONAL RECYCLED WATER PROJECT IS/MND	1
1.1	Project Location	1
1.2	Project Background and Revised Project Description	1
1.3	Environmental Analysis	7
1.4	Cumulative Impacts	13
1.5	Conclusion	14
1.6	References	14
APPENDICES Appendix A	2022 IS/MND	
Appendix B	Mitigation Monitoring and Reporting Program	
Appendix C	Biological Resources Report and Aquatic Resources Delineation Report	
FIGURES		
Figure 1	Project Location	
Figure 2	Previously Approved Project	3
Figure 3	Proposed Project	5

This page is intentionally left blank.

### 1 ADDENDUM TO THE RIVERBANK REGIONAL RECYCLED WATER PROJECT IS/MND

At the request of the City of Riverbank (City), Ascent has prepared this evaluation of the potential environmental impacts that may be associated with updates to the approved 2022 Riverbank Regional Recycled Water Project (2022 project). This evaluation assesses whether the potential impacts of the current project are within the scope of analysis and adequately addressed by the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the 2022 project (State Clearinghouse No. 2022090345) (Appendix A). This analysis determines whether new or different impacts would occur because of changes to the proposed project design and changes in circumstances under which the project is undertaken since the prior IS/MND analysis), pursuant to Section 15162 of the California Environmental Quality Act (CEQA) Guidelines. Based on the analysis contained in this memorandum, the City has determined that an addendum is the appropriate environmental document for the project consistent with Section 15164 of the CEQA Guidelines.

#### 1.1 PROJECT LOCATION

The City of Riverbank is located on the south side of the Stanislaus River along State Route 108 in Stanislaus County, 94 miles east of San Francisco, 75 miles south of Sacramento, 100 miles north of Fresno, and 108 miles west of Yosemite National Park. The City's Wastewater Treatment Plant (WWTP) is located on the north side of the Stanislaus River, in unincorporated San Joaquin County, at 23865 Santa Fe Road (Assessor Parcel Numbers: 247-260-02, 247-250-04, and 247-250-22). The project location is shown in Figure 1.

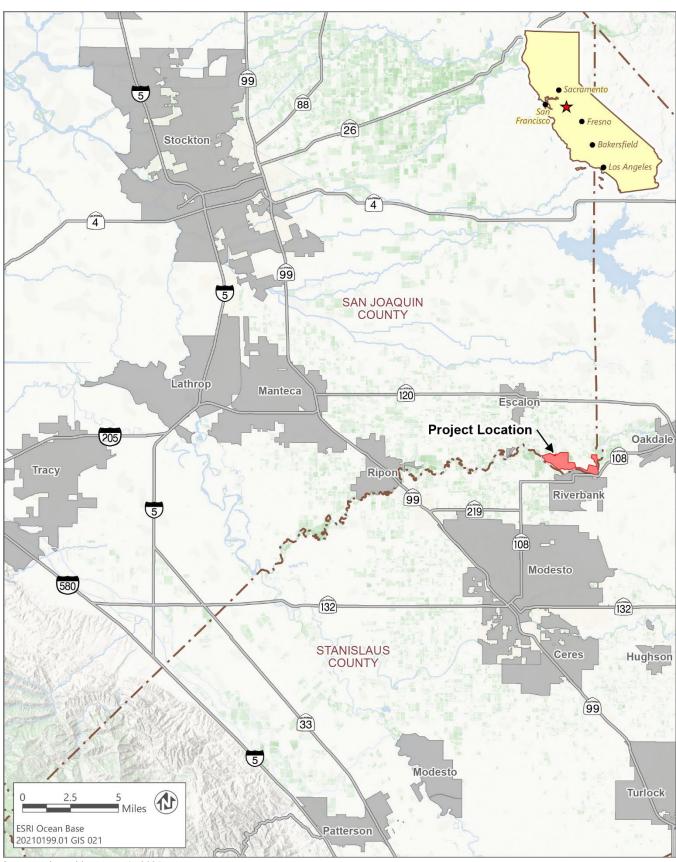
Jacob Myers Park, a regional park along the northern bank of the river, is located along the southern border of the Riverbank WWTP; agricultural lands surround the remainder of the project area. A Burlington Northern and Santa Fe Railway railroad track runs through the project area east of the WWTP.

#### 1.2 PROJECT BACKGROUND AND REVISED PROJECT DESCRIPTION

In 2022, the City adopted the IS/MND for the Riverbank Regional Recycled Water Project. The 2022 IS/MND evaluated upgrades to the existing City WWTP, including new secondary and tertiary treatment and disinfection facilities, construction of a recycled water storage tank, reconfiguration of existing treatment and percolation ponds to provide additional seasonal recycled water storage, and installation of a recycled water distribution system (i.e., Pipelines A, A1, A2, and B) to serve nearby agricultural users.

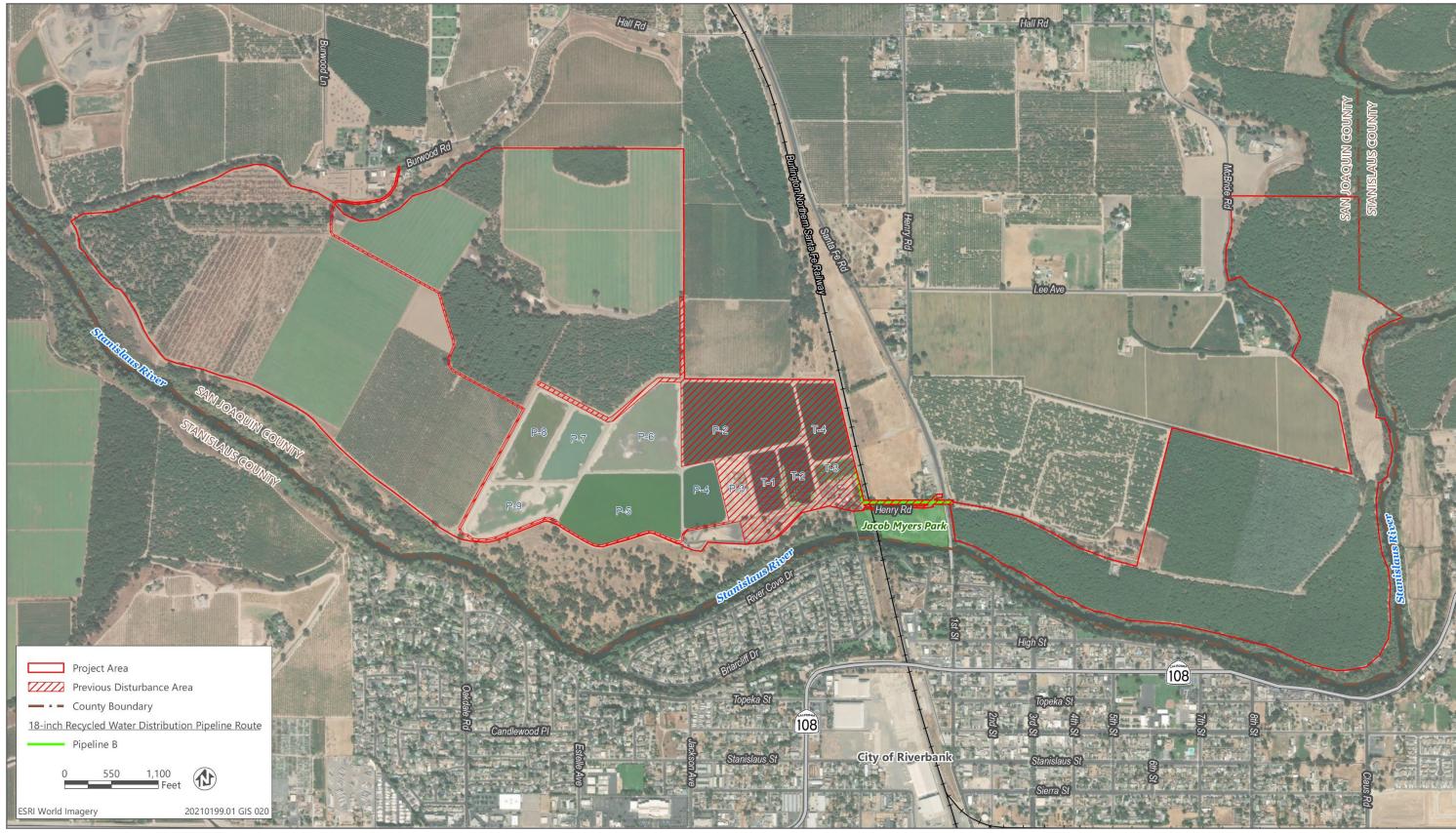
In September 2024, the 2022 project was updated and now includes a modified disturbance area (proposed project), including a new route for recycled water Pipeline B. As shown in Figure 2, the previously approved project considered the disturbance of areas P-2, P-3, T-1, T-2, T-3, T-4, construction staging areas within the southwestern portion of the site, and areas along Henry Road and north of Henry Road for installation of Pipeline B. The currently proposed project would no longer involve disturbance of area T-4; P-9 would instead be excavated for borrow and fill material to construct the treatment facilities. Additionally, Pipeline B would be routed south of Henry Road, within the northern boundary of Jacob Myers Park, to maintain full-time access to the WWTP (Figure 3).

Construction activities would last approximately 30 months and would involve similar amounts of earthmoving activity as well as use of construction equipment identified and analyzed in the 2022 IS/MND (see Appendix A).



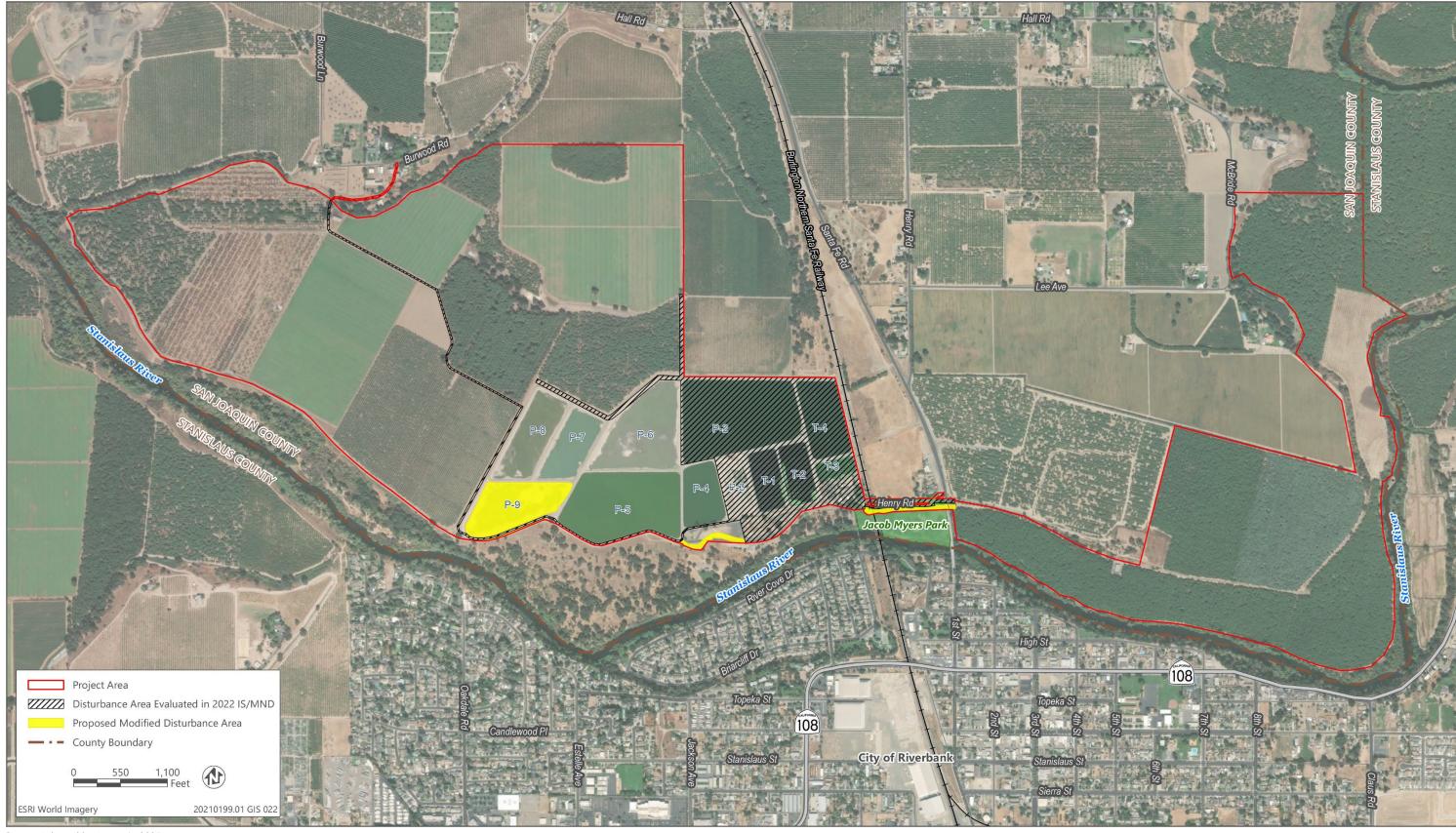
Source: Adapted by Ascent in 2025.

Figure 1 Project Location



Source: Adapted by Ascent in 2025.

Figure 2 Previously Approved Project



Source: Adapted by Ascent in 2025.

Figure 3 Proposed Project

#### 1.3 ENVIRONMENTAL ANALYSIS

Using Appendix G, Environmental Checklist, of the CEQA Guidelines as an analytical tool, the following discussion evaluates the potential environmental impacts of implementation of the project in the context of the 2022 IS/MND to determine if those impacts are sufficiently covered, or if additional analysis is necessary. All mitigation measures referenced in this section are included in Appendix B, Mitigation Monitoring and Reporting Program.

#### 1.3.1 Aesthetics

The 2022 IS/MND determined that impacts related to aesthetics would be less than significant. Implementation of the project would involve modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. The project would result in the same level of construction activities as previously analyzed. While temporary construction activities would be visible within portions of the park, the project would not permanently introduce any project features or components that would alter the visual quality or nature of the project area such that different or more severe aesthetic impacts would result.

The potential environmental impacts related to aesthetics and associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.2 Agricultural and Forestry Resources

The 2022 IS/MND determined that no impacts related to agriculture and forestry resources would occur. Implementation of the project would involve modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. Project construction and operation would occur within developed areas, including existing private roadways and within areas of the WWTP facility, as analyzed in the 2022 IS/MND. The WWTP and proposed alignment of Pipeline B is not located within any designated Farmland or Williamson Act-enrolled lands (DOC 2024a; DOC 2024b). No forestry resources exist within the project site.

As a result, the potential environmental impacts related to agricultural and forestry resources associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.3 Air Quality

The 2022 IS/MND determined that impacts related to air quality would be less than significant and that the project would not conflict with or obstruct an applicable air quality management plan nor result in increased criteria air pollutants or other emissions that would adversely affect sensitive receptors. The project as revised would result in similar construction activity, equipment, and level of construction-generated emissions as previously evaluated in the 2022 IS/MND. Because of this, the current project would also not result in a significant air quality impact. As previously described, construction activities associated with Pipeline B would be temporary, and therefore, would not result in long-term exposure to sensitive receptors (i.e., park users).

As a result, the potential environmental impacts related to air quality associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.4 Biological Resources

The 2022 IS/MND determined that no impacts to state or federally protected wetlands, or to adopted conservation plans would occur. Impacts related to riparian habitat or other sensitive natural communities, to the movement of native resident or migratory species, movement corridors, or nursery sites, and to local policies or ordinances were determined to be less than significant. Impacts to special-status species would be less-than-significant with implementation of Mitigation Measures 3.4-1 through 6, presented below. These mitigation measures would continue to remain applicable if the project were approved.

- Mitigation Measure 3.4-1: Avoid and Minimize Impacts to Valley Elderberry Longhorn Beetle.
- ▶ Mitigation Measure 3.4-2: Avoid and Minimize Impacts to Western Pond Turtle.
- ▶ Mitigation Measure 3.4-3: Avoid and Minimize Impacts to Swainson's Hawk, Coopers Hawk, Osprey, and White-tailed Kite.
- Mitigation Measure 3.4-4: Avoid and Minimize Impacts to Other Special-Status Birds.
- Mitigation Measure 3.4-5: Avoid and Minimize Impacts to Common Raptors and Other Nesting Birds.
- Mitigation Measure 3.4-6: Avoid and Minimize Impacts to Western Red Bat Roosts.

Implementation of the project would involve modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. An updated Biological Resources Report and Aquatic Resources Delineation Report were prepared in January 2025 (see Appendix C). A biological resources reconnaissance-level survey conducted within the modified disturbance areas on December 9th, 2024, identified additional elderberry shrubs proximate to the modified disturbance area. These additional elderberry shrubs are located within Jacob Meyers Park, and to the west of Jacob Meyers Park, and south of the WWTP. Mitigation Measure 3.4-1 would continue to be implemented during project activities. The December 2024 survey did not identify any additional special-status species or sensitive biological resources that were not addressed by the 2022 IS/MND, and Mitigation Measures 3.4-2 through 3.4-6 would continue to be implemented during project activities.

The potential environmental impacts related to biological resources associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.5 Cultural Resources

The 2022 IS/MND determined that impacts related to historical resources and human remains would be less than significant. Impacts related to archaeological resources were determined to be less-than-significant with implementation of Mitigation Measure 3.5-1, presented below, which would require preservation and proper curation of potential cultural materials, if discovered. This mitigation measure would continue to remain applicable if the project were approved.

▶ Mitigation Measure 3.5-1: Protect Unanticipated Archaeological Resource Discoveries.

Implementation of the project would involve modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. An updated cultural resources survey was conducted within the modified disturbance areas on December 9th, 2024; the updated cultural resources memo was prepared in February 2025. Results of the survey and report did not reveal any new cultural resources within the project site. While the proposed alignment of Pipeline B would be located under a portion of the Burlington Northern and Santa Fe Railway railroad track piers, this is consistent with the previously approved project; the new alignment is located further south than the approved alignment. The proposed project would not result in any adverse changes to the railroad track and supporting structures. Additionally, Mitigation Measure 3.5-1 would continue to be implemented during project construction activities.

The potential environmental impacts related to cultural resources associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.6 Energy

The 2022 IS/MND determined that impacts related to energy would be less than significant. The project would result in similar construction activity, equipment, and level of construction-generated emissions as previously evaluated in the 2022 IS/MND. As a result, the project's energy consumption through construction and operation would not be considered wasteful, inefficient, or unnecessary. Project construction and operation would continue to be subject to state and local requirements and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The potential environmental impacts related to energy associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.7 Geology and Soils

The 2022 IS/MND determined that no impacts related to use of septic or alternative wastewater systems, nor seismic hazards involving rupture of known earthquake fault and landslides would occur. Impacts related to seismic hazards involving ground shaking and liquefaction, erosion, and unstable and expansive soils were determined to be less than significant. Impacts related to paleontological and geologic features were determined to be less-than-significant with incorporation of the mitigation measures 3.7-1, 3.7-2, and 3.7-3, presented below, which would require paleontological design review, preparation of a Paleontological Mitigation Plan, conducting paleontological monitoring, and in the event paleontological resources are discovered, providing data retrieval, fossil collection and processing, and curation as appropriate. These mitigation measures would continue to remain applicable if the project were approved.

- ▶ Mitigation Measure 3.7-1: Retain Qualified Paleontologist to Conduct Project Design Review.
- ▶ Mitigation Measure 3.7-2: Prepare Paleontological Resources Impact Mitigation Plan.
- ▶ Mitigation Measure 3.7-3: Conduct Paleontological Monitoring.

Implementation of the project would involve modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. No changes related to seismic activity, ground shaking, ground failure, landslides, or soil have occurred. The project would not require septic systems or alternative wastewater systems.

The potential environmental impacts related to geology and soils associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.8 Greenhouse Gas Emissions

The 2022 IS/MND determined that impacts related to greenhouse gas emissions (GHGs) would be less than significant. Implementation of the project would involve modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. The project would result in similar construction activity, equipment, and level of construction-generated emissions as previously evaluated in the 2022 IS/MND. As a result, the project would not directly or indirectly generate GHG emissions such that significant environmental impact would occur, nor conflict with any application plan, policy, or regulations related to GHG emission reduction.

The potential environmental impacts related to GHG emissions associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.9 Hazards and Hazardous Materials

The 2022 IS/MND determined that no impacts related to hazardous emissions or materials within 0.25 mile of schools, safety hazards or noise within 2 miles of an airport, or exposure to significant risks involving wildland fires would occur. Impacts related to the handling and/or accident conditions involving hazardous materials, hazardous materials and waste sites, and interference with adopted emergency response or evacuation plans were determined to be less than significant. As described above, implementation of the project would involve similar levels of construction activities and modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. The project would continue to comply with applicable hazardous materials regulations and waste discharge requirements related to WWTP operations. No new hazardous materials and/or waste sites exist within the project vicinity (DTSC 2024; SWRCB 2024a). A former leaking underground storage tank site (i.e., former gas station with identified petroleum contamination) located at 23659 South Santa Fe Road has completed cleanup and the case has been considered closed as of August 2024 (SWRCB 2024b). During project construction, temporary traffic controls would continue to be implemented to maintain roadway and park access; all roadways would be repaved and returned to pre-project conditions once construction activities are completed.

The potential environmental impacts related to hazards and hazardous materials associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.10 Hydrology and Water Quality

The 2022 IS/MND determined that impacts related to hydrology and water quality would be less than significant. Implementation of the project would involve modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. The project would result in similar construction activities considered with the previously approved project and would not result in any substantial changes to surface water or groundwater quality and supply, drainage patterns or flood flows, or conflicts with water quality control or sustainable groundwater management plans beyond those anticipated in the 2022 IS/MND.

The potential environmental impacts related to hydrology and water quality associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.11 Land Use and Planning

The 2022 IS/MND determined that no impacts related to land use and planning would occur. The project would involve modified disturbance areas within the WWTP and the northern boundary of Jacob Myers Park. The project would not result in any land use changes or conflicts, nor result in physical division of an established community.

The potential environmental impacts related to land use and planning associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.12 Mineral Resources

The 2022 IS/MND determined that no impacts related to mineral resources would occur. The project would involve modified disturbance areas within the WWTP and the northern boundary of Jacob Myers Park. The project does not include any mineral resource extraction and therefore would not result in the loss of known mineral resources or a mineral resource site.

The potential environmental impacts related to mineral resources associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.13 Noise and Vibration

The 2022 IS/MND determined that no impact related to exposure of excessive noise levels within the vicinity of an airport or airport land use plan would occur. Impacts related to generation of ambient noise levels and groundborne vibration and noise levels were determined to be less than significant. Implementation of the project would involve modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. As previously described, the project would result in similar construction activity and equipment considered with the previously approved project. Therefore, project construction activities would result in similar duration, as well as type and number of construction equipment operating at similar levels of intensity as previously contemplated. Potential increases in shortand long-term noise and vibration exposure of sensitive receivers would be similar to those evaluated in the 2022 IS/MND.

The potential environmental impacts related to noise and vibration associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.14 Population and Housing

The 2022 IS/MND determined that no impact related to displacement of existing people or housing would occur, while impacts related to substantial unplanned population growth were determined to be less than significant. Project implementation would involve similar levels of construction as previously contemplated in the 2022 IS/MND associated with modified disturbance areas within the WWTP and the northern boundary of Jacob Myers Park. The project would not generate demand for temporary construction-related employment or population growth beyond what was considered in the 2022 IS/MND, nor would the project result in displacement of any people or housing.

The potential environmental impacts related to population and housing associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.15 Public Services

The 2022 IS/MND determined that impacts related to public services would be less than significant. The project would involve modified disturbance areas within the WWTP and the northern boundary of Jacob Myers Park; construction activities, duration, and equipment would be similar to that contemplated for the previously approved project. As described above, the project would not generate demand for population growth beyond what was considered in the 2022 IS/MND. Additionally, temporary traffic controls would continue to be implemented to maintain roadway and park access, including access for emergency vehicles. No new physical impacts requiring new physically altered governmental facilities would occur.

The potential environmental impacts related to public services associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.16 Recreation

The 2022 IS/MND determined that no impacts related to recreation would occur. The project would involve modified disturbance areas within the WWTP and the northern boundary of Jacob Myers Park. As discussed above, temporary traffic controls would continue to be implemented during project construction activities to maintain roadway and park access; all roadways would be repaved and returned to pre-project conditions once construction activities are completed. The project would not result in increased use of recreational facilities nor include new or expanded recreational facilities. Access to existing recreational facilities (i.e., Jacob Myers Park) would be maintained.

The potential environmental impacts related to recreation associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.17 Transportation

The 2022 IS/MND determined that impacts related to conflicts with any program, plan, ordinance, or policy addressing the circulation system as well as conflicts with CEQA Guidelines section 15064.3(b) would be less than significant. Impacts related to transportation hazards and emergency access were determined to be less-than-significant with incorporation of Mitigation Measure 3.17-1, presented below, which would require preparation and implementation of a temporary traffic control plan prior to and during project construction activities. This mitigation measure would continue to remain applicable if the project were approved.

Mitigation Measure 3.17-1: Prepare and Implement a Temporary Traffic Control Plan.

The project would involve modified disturbance areas within the WWTP and the northern boundary of Jacob Myers Park. Temporary traffic controls would continue to be implemented during construction activities to appropriately maintain access within the project area; all roadways would be repaved and returned to pre-project conditions once construction activities are completed.

The potential environmental impacts related to transportation associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.18 Tribal Cultural Resources

The 2022 IS/MND identified that no California Native American Tribe(s) had requested consultation in accordance with Public Resources Code Section 21080.3.1(b) and determined that impacts related to tribal cultural resources would be less-than-significant with implementation of Mitigation Measure 3.18-1. Mitigation Measure 3.18-1 would require appropriate treatment and proper care of significant tribal cultural resources, if discovered. This mitigation measure would continue to remain applicable if the project were approved.

Mitigation Measure 3.18-1: Protect Unanticipated Discoveries of Potential Tribal Cultural Resources.

The project would involve modified disturbance areas within the WWTP and the northern boundary of Jacob Myers Park. Continued implementation of Mitigation Measure 3.18-1 would ensure that any tribal cultural resources, if discovered during project construction activities, would be appropriately treated. Therefore, the potential environmental impacts related to tribal cultural resources associated with implementation of the project are adequately

addressed by the 2022 IS/MND and no additional CEQA documentation is required. Because the addendum will not result in an additional certification, the AB 52 procedures specified in PRC Sections 21080.3. 1(d) and 21080.3.2 do not apply and no additional tribal consultation under AB 52 is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.19 Utilities and Services Systems

The 2022 IS/MND determined that no impacts related to wastewater treatment capacity would occur; impacts related to new or expanded utilities, water supplies, and solid waste were determined to be less than significant. The project would involve modified disturbance areas, however, would involve similar construction activities, duration, and equipment to those contemplated with the previously approved project. No new utility infrastructure would be introduced beyond what was considered in the previously approved project. As previously described, Pipeline B would be routed south of Henry Road, within the northern boundary of Jacob Myers Park. The project would continue to be adequately served by the City's existing and future water source for water supplies and the Manteca Landfill for solid waste generation; the project would comply with regulations and requirements related to solid waste.

The potential environmental impacts related to utilities and service systems associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.3.20 Wildfire

The 2022 IS/MND determined that no impacts related to exacerbation of wildfire risks or exposure to post-fire conditions would occur; impacts related to emergency response and evacuation plans were determined to be less than significant. The project site is located within the Local Responsibility Area for fire protection and is not within a designated fire hazard severity zone (CALFIRE 2025). Project implementation would involve modified disturbance areas within the WWTP and northern boundary of Jacob Myers Park. Construction activities, duration, and equipment would be similar to those contemplated with the previously approved project. As previously discussed, temporary traffic controls would be implemented during project construction activities to ensure adequate access (including emergency vehicle access) is maintained in the project area. Once construction is completed, all roadways would be restored to pre-project conditions.

The potential environmental impacts related to wildfire associated with implementation of the project are adequately addressed by the 2022 IS/MND and no additional CEQA documentation is required. Further, pursuant to Section 15162 of the State CEQA Guidelines, no new information of substantial importance has been identified that would otherwise necessitate subsequent/supplemental environmental analysis.

#### 1.4 CUMULATIVE IMPACTS

The project would result in modified disturbance areas within the WWTP (area P-9) and along the northern boundary of Jacob Myers Park for installation of Pipeline B. Construction activities, equipment, and duration would be similar to what was evaluated in the previously approved project. Mitigation measures presented in the analysis above would remain applicable to reduce any potential biological resource, cultural resource, paleontological, transportation, and/or tribal cultural resource impact to a less-than-significant level. Therefore, the project would not result in cumulative impacts beyond those previously analyzed.

#### 1.5 CONCLUSION

As described throughout this document, the proposed project would involve modified disturbance areas within the WWTP and the northern boundary of Jacob Myers Park; construction activities, equipment, and level of construction would be similar to what was contemplated in the 2022 IS/MND. The project would continue to comply with applicable federal laws and regulations identified in Chapter 3, "Environmental Checklist," and Chapter 4, "Compliance with Federal Regulations," of the 2022 IS/MND (see Appendix A).

Based on the analysis presented above, the City has concluded that an addendum to the previously approved 2022 IS/MND is the appropriate document under CEQA for the project. In summary, the analysis concludes that the implementation of the proposed project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant impacts beyond those analyzed in the previously approved document. None of the conditions described in Section 15162 of the CEQA Guidelines calling for preparation of a subsequent environmental document have occurred, and thus, an addendum to the 2022 IS/MND is appropriate to satisfy CEQA requirements for the proposed project changes.

#### 1.6 REFERENCES

California Department of Fire Protection. 2025. Fire Hazard Severity Zone Viewer. Available: https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/. Accessed February 9, 2025.

City of Riverbank. 2022. Riverbank Regional Recycled Water Project Initial Study/Mitigated Negative Declaration.

Department of Conservation. 2024a. California Important Farmland Finder. Available: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed December 18, 2024.

———. 2024b. California Williamson Act Enrollment Finder. Available:

https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed

Department of Toxic Substances Control. 2024. Envirostor Database. Available: https://www.envirostor.dtsc.ca.gov/public/map/?global\_id=38330005. Accessed December 18, 2024.

DOC. See Department of Conservation.

DTSC. See Department of Toxic Substances Control.

State Water Resources Control Board. 2024a. Geotracker Database. Available: https://geotracker.waterboards.ca.gov/map/?global\_id=T0607302824. Accessed December 18, 2024.

———. 2024b. Geotracker Database: Barrera's Market LUST Cleanup Site. Available: https://geotracker.waterboards.ca.gov/profile\_report.asp?global\_id=T10000013865. Accessed December 18, 2024.

SWRCB. See State Water Resources Control Board.