

# **Riverbank Army Ammunition Plant Specific Plan**

## **Addendum to the Final Environmental Impact Report**

**State Clearinghouse #2011022015**

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Riverbank Army Ammunition Plant Specific Plan  
in the City of Riverbank and Stanislaus, California

## Addendum to the Environmental Impact Report

City of Riverbank

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Date of Certification

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## **INTRODUCTION**

The City of Riverbank (City) previously approved the Riverbank Army Ammunition Plant (RAAP) Specific Plan. The RAAP site was formerly owned and operated under control of the United States Army (Army) and was selected for closure as part of the Base Closure and Realignment (BRAC) in 2005. The site is approximately 146 acres in area. The northern and southern areas of the site remain undeveloped, and the central portion of the site contains the RAAP's existing buildings and infrastructure which was previously used to manufacture shell casings, mortar grenades and other ammunition components. The Specific Plan provides the zoning for the RAAP site and permits a mix of industrial, office/research and development, and retail uses within the Specific Plan Area. The environmental study of the Specific Plan culminated in an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA). The City is the Lead Agency under CEQA.

## **BACKGROUND**

On March 29, 2013, the Draft EIR for the Specific Plan was made available for public review. The Draft EIR was distributed to local and State responsible and trustee agencies and the general public was advised of the availability of the Draft EIR through public notice published in the local newspaper and on the City website. The EIR was approved by the City Council on February 10, 2014 (as approved, the "EIR").

As part of the ongoing development of the RAAP Site, the City acquired title to a portion of the property from the Army referred to as Parcel B. The City subsequently sold Parcel B to Aemetis Properties Riverbank, Inc. for development purposes. Aemetis is planning to drill a geologic characterization well on Parcel B to provide information it can use to determine potential future uses (described more below). The City has previously determined that the well is a permitted use within the Parcel B zoning established by the Specific Plan, and development on Parcel B is part of the overall development of the RAAP site that is covered by the EIR. The Specific Plan's description of the environmental review process for projects at the RAAP site states that the EIR may cover some development without need for additional CEQA documentation, but some potential development may need additional documentation. (See Specific Plan, p. 117.) This current Addendum is intended to update the project description in the EIR to include the planned geologic characterization well.

## **PROJECT DESCRIPTION**

### **Specific Plan Project Description**

The RAAP site was formerly owned and operated under control of the United States Army (Army) and was selected for closure as part of the Base Closure and Realignment (BRAC) in 2005. The site is approximately 146 acres in area. The northern and southern areas of the site remain undeveloped, and the central portion of the site contains the RAAP's existing buildings and infrastructure which was previously used to manufacture shell casings, mortar grenades and other ammunition components. The developed portion of the RAAP site contains approximately 150 existing structures, most of which are industrial in character. These structures are generally single-story, utilitarian buildings designed to house manufacturing activities. Areas between buildings are generally paved and used for parking, storage, or circulation. The undeveloped areas to the north and south of the existing RAAP site facilities are generally grasslands. Portions of the northern area serve as grazing land.

The existing industrial area on the RAAP site is bordered on the north, east, and south by pasture land and rural residential uses. Low-density residential uses are located across Claus

Road on the northern half of the site. A small vehicle storage lot is located across Claus Road between Minniear and Van Dusen Avenues. The Hetch Hetchy Aqueduct and power lines run roughly east-west across the site on a strip of land approximately 100 feet wide. The Oakdale Irrigation District Canal runs northeast-southwest through the site and is approximately 60 feet wide. An active rail line with a 50-foot easement enters the site at the north-west corner, crosses both the Hetch Hetchy Aqueduct and Oakdale Irrigation District Canal, and continues into the site where it serves many of the existing buildings.

The purpose of the Specific Plan was to create zoning for the RAAP site that would permit a mix of industrial, office/research and development (R&D), and retail uses within the Specific Plan Area. The EIR anticipated redevelopment of the site would occur in the following ways:

*Existing Industrial Areas.* The Specific Plan recommends that existing industrial areas should generally be retained as they are now. The Specific Plan also allows for additional buildings, and removal of and modifications to existing buildings in this area, with policies in place to maintain the historic character and preserve the viability of this area for future industrial uses. Additional landscaping is also recommended for this area in the Specific Plan, both for improved aesthetics and to implement principles of low-impact development (LID). It is anticipated that new development in this area would be of a similar character to existing development.

*North End Cap.* The Specific Plan recommends a mix of R&D and industrial uses in this area. Recommended uses range from industrial uses to higher-end office and R&D uses.

*Retail.* The zoning established by the Specific Plan allows primarily retail uses in certain areas, including the west side of the RAAP site along Claus Road, between the Van Dusen Avenue and Minniear Avenue intersections, and at the prominent corner of Claribel and Claus Roads. Other specified uses in these areas can be built subject to a conditional use permit.

*South End Cap.* Most of the southern undeveloped area on Claribel Road is proposed for R&D/industrial uses.

For purposes of evaluating the effects of establishing the above zoning areas pursuant to the Specific Plan, the EIR analyzed the effects of the zoning changes as well as the build-out of the site pursuant to the new zoning.

### **New Project Features**

Aemetis is planning to drill a geologic characterization well, otherwise known as a vertical stratigraphic test well. The well would be drilled at the Riverbank pad located approximately 1,140 feet east of Claus Road and 1,000 feet south of Kentucky Avenue in the northeast quadrant of the RAAP property. The primary purpose of the well is to help determine whether the area around Riverbank is suitable for future carbon capture and sequestration. Those types of future activities are not yet completely determined and will require a host of separate federal and state permits, as well as additional environmental review if a specific project is developed.

The geologic characterization well would be drilled to a total depth of approximately 7,100 feet. At approximately 80 feet, a 14-inch conductor will be set. At approximately 1,500 feet, a 9 5/8-inch surface casing will be set to protect underground source of drinking water zones. At

approximately 4900 feet, a 5 ½ -inch casing would be set. Core samples will be taken in portions of the Sawtooth and Lathrop Formations. The Sawtooth Formation occurs at an approximate depth of 4768 feet and the Lathrop Formation occurs at an approximate depth of 5823 feet. Electric logs will be run and sidewall cores will be taken from the Sawtooth and Lathrop Formations. The well bore will initially be plugged back to the base of the 5 ½-inch casing, and may later be completely closed in. In addition to any other permits required by applicable law, Aemetis plans to seek a permit from California Department of Conservation's Geologic Energy Management Division (CalGEM) for the characterization well, which will incorporate compliance with CalGEM's standards for such wells.

Well drilling would take approximately 8 weeks and drilling operations will take place up to 24 hours per day during that period. During the drilling operations, a 24-ft high sound barrier wall will be constructed including a 200-foot section of wall on the north side and 120-foot section of wall on the east side of the proposed site, which would join together in the northeast corner.

### **APPROPRIATE CEQA DOCUMENTATION FOR THE PROPOSED REVISION**

In accordance with Section 15164(a) of the CEQA Guidelines, "The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."

The conditions in Sections 15162(a) include:

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

In order for the City, as the lead agency, to use an Addendum as the appropriate CEQA document, CEQA Guidelines § 15164(e) states that "A brief explanation of the decision to not prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to the EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence."

### **Environmental Analysis**

As previously stated, the 2014 EIR identified potentially significant impacts for several environmental resources associated with the development and build out of the RAAP site, including air quality, cultural resources, noise, and transportation and traffic. As a result, the EIR necessarily analyzed these impacts and for the construction activities and discussed mitigation measures. Pursuant to the determinations in the EIR, most of the impacts from the full site build out would be less than significant or reduced to a less than significant level with implementation of mitigation. This addendum covers an update to the Project to also describe the new geologic characterization well and determine whether the addition of the well to the EIR's project description would have impacts satisfying the criteria of Section 15162 described above.

### Aesthetics

Would the Project result in:

- a) *Have a substantial adverse effect on a scenic vista?*
- b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*
- c) *In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*
- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The new geologic characterization well would not have any potential impact on a scenic vista, as it will not be located near any scenic views as designated in the Riverbank General Plan. There would be no potential impact on a scenic highway. The nearest official State Scenic Highway is Interstate 5, which is located 20 miles to the west of the Project area. The existing visual character of the RAAP site is predominantly industrial. The site's visual character is composed of corrugated metal warehouses, chillers, smokestacks, water and gas storage tanks, the metal tubing, and electrical wiring. Viewing the site is possible from all directions surrounding the property, through barbed wire fences. The Project would involve constructing a temporary 24-foot-high sound barrier wall around the drill site during construction. The wall is expected to be a steel framed structure (similar to large fence posts) covered on the outside with earth-toned sound deadening fabric. The wall will be evaluated prior to construction to determine if it needs a building permit. The temporary wall would not degrade the visual quality of the site and its surroundings because it falls in line with the land use designation. The proposed Project would likely introduce new lighting features during construction operations, similar to those currently existing within the Project site. The sound barrier wall and lighting would be temporary during drilling activities, which are only anticipated to last up to 8 weeks. After construction, the well will only consist of a small permanent wellhead, which would not generally be visible. The previous EIR did not find any significant impacts relating to aesthetics, and the geological characterization well would not result in any new, previously unidentified impacts.

### Agriculture and Forest Resources

Would the Project result in:

- a) *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- b) *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- c) *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*
- d) *Result in the loss of forest land or conversion of forest land to non-forest use?*
- e) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

The new geologic characterization well site does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The areas of Farmland of Local Significance in the Plan Area are not considered farmland of concern under CEQA. There are no

Williamson Act lands within the Project site. There are no timber resources in Riverbank, so impacts to timber resources are not anticipated. The Project site contains very few trees and construction of the new well would not result in conversion of forest land. The new well would not result in conversion of farmland to non-agricultural use, since the well would not be located on farmland, but rather industrial land. The previous EIR already analyzed a project that would involve construction on virtually all of the RAAP site and did not find any significant impacts relating to agriculture and forest resources, and the geological characterization well would not result in any new, previously unidentified impacts.

### **Air Quality**

Would the Project:

- a) *Conflict with or obstruct implementation of the applicable air quality plan?*
- b) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*
- c) *Expose sensitive receptors to substantial pollutant concentrations?*
- d) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Construction of the geologic characterization well would not conflict with or obstruct implementation of an applicable air quality plan. The well installation activities will be only temporary, with no air impacts following completion. The impacts during construction will be similar to but less than the construction activities already analyzed in the EIR, which could include a temporary increase in particulate dust and other criteria pollutants, emissions from construction equipment exhaust and worker vehicle trips. This impact was already determined in the existing EIR to be potentially significant, and mitigation measures adopted. Construction emissions would be temporary and would cease upon completion. The well is not expected to create significant odor sources. The construction of the well will be required to comply with San Joaquin Valley Air Pollution Control District air emissions and permitting rules, to the extent applicable, which will include notices and registration of portable equipment. The previous EIR found significant impacts relating to air quality; however, the geological characterization well would not result in any new, previously unidentified impacts not previously analyzed.

### **Biological Resources**

Would the Project:

- a) *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?*
- b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- c) *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*
- d) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*
- e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree*

- preservation policy or ordinance?*
- f) *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Construction of the new geologic characterization well would not have the potential to impact biological resources. The previous EIR analyzed the build out of the entire RAAP site and found that impacts relating to biological resources would be less than significant with implementation of mitigation measures. The geological characterization well would occupy only a small portion of the RAAP site, so would not result in any new, previously unidentified significant impacts.

### **Cultural Resources**

Would the Project:

- a) *Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?*
- b) *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*
- c) *Disturb any human remains, including those interred outside of dedicated cemeteries?*

Construction of the geologic characterization will occur on unoccupied land so would not involve demolition or alteration of buildings within an area that is eligible to be listed on the California Register of Historic Places. There are no known archaeological resources in the Project site and a records search of files at the Central California Information Center indicated there are no recorded prehistoric cultural resources in Riverbank. Human remains dating to the prehistoric period of California have been located at numerous locations along rivers and streams within the San Joaquin Valley, but there are no known prehistoric human remains in the vicinity of Riverbank. Nevertheless, given that prehistoric and historic settlement has generally occurred along rivers, the EIR recognized the possibility that as yet undiscovered human remains could potentially be present at the RAAP site, since the Stanislaus River is located approximately 1.5 miles north of the Project site. The previous EIR already found significant impacts relating to cultural resources and imposed mitigation measures. The geological characterization well would not result in any new, previously unidentified impacts.

### **Energy**

Would the Project:

- a) *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- b) *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Proposed project construction would primarily consume diesel and gasoline through temporary operation of heavy-duty construction equipment, material deliveries, and debris hauling. This temporary operation represents a small demand on local and regional fuel supplies that would be easily accommodated, and this demand would cease once construction is complete. Moreover, construction-related energy consumption would be temporary and not a permanent new source of energy demand, and demand for fuel would have no noticeable effect on peak or baseline demands for energy. The proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during short-term construction operations. The Project would not conflict with or obstruct a state or local plan for renewable energy. The previous

EIR did not analyze impacts relating to energy; however, the geological characterization well would not result in any new, previously unidentified impacts.

### **Geology and Soils**

Would the Project:

- a) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
  - i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
  - ii) *Strong seismic ground shaking?*
  - iii) *Seismic-related ground failure, including liquefaction?*
  - iv) *Landslides?*
- b) *Result in substantial soil erosion or the loss of topsoil?*
- c) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*
- d) *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*
- e) *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*
- f) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The new geologic characterization well site is not located within an Alquist-Priolo Earthquake Fault Zone and is not located on an active fault as designated by the California Geologic Survey. Appropriate geological research and modeling has been performed as part of the well design, and there is no expected risk of seismic events as a result of the well or any future activities. The Project site has flat topography, which means that landslides or other similar hazards would not occur. Land subsidence is not characteristic of soils in Riverbank and the Project site. As such, the well would not be located on a geologic unit that is unstable. The new well would not create substantial direct or indirect risks to life or property. No septic tanks or alternative wastewater disposal systems would be required to serve the new well. The EIR determined that there are no known paleontological resources located at the RAAP site. Since the well site is located on small portion of the larger site, it is unlikely that, yet undiscovered paleontological resources would be disturbed. The previous EIR did not find any significant impacts relating to geology and soils, and the geological characterization well would not result in any new, previously unidentified impacts.

### **Greenhouse Gas Emissions**

Would the Project:

- a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Short-term construction emissions from the new geologic characterization well are anticipated. Emissions from construction equipment would include all equipment powered by gasoline and diesel engines. The EIR previously analyzed the overall construction of the entire RAAP site, so the temporary construction of the well is within the size and length of construction anticipated.

The previous EIR found that impacts relating to greenhouse gases would be less than significant with implementation of mitigation measures. The geological characterization well would not result in any new, previously unidentified impacts.

### **Hazards and Hazardous Materials**

Would the Project:

- a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b) *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*
- c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*
- d) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*
- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*
- f) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*
- g) *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

The new geologic characterization well is not anticipated to emit hazardous air emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The nearest school is California Ave. Elementary School which is approximately half a mile away from the Project site. Construction of the well would be temporary, and all well drilling byproducts would be captured in tanks or other lined structures and then disposed off-site at properly licensed landfills. The Project site is located approximately 1.2 miles from the Peterson Airport, a privately owned airport located at 5800 Langworth Road. The landing strip runs from east to west, and the landing approach is from the southwest. The Project would not interfere with an adopted emergency response plan or emergency evacuation plan. The geologic characterization well would not expose people, either directly or indirectly, to a significant risk of loss, injury or death involving wildfires. The previous EIR did not find any significant impacts relating to hazards and hazardous materials, and the geological characterization well would not result in any new, previously unidentified impacts.

### **Hydrology and Water Quality**

Would the Project:

- a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?*
- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
  - (i) *result in substantial erosion or siltation on- or off-site;*
  - (ii) *substantially increase the rate or amount of surface runoff in a manner which would result in*

- flooding on- or offsite;*
- (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
  - (iv) impede or redirect flood flows?*
- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*
- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The new geologic characterization well would be constructed per the California Department of Conservation's Geologic Energy Management Division (CalGEM) permitting and regulatory program requirements. A CalGEM permit to construct and drill a well requires the operator to follow standard best practices and measures to protect the hydrology and water quality of subsurface formations and underground sources of drinking water (USDWs). During drilling of the well, a 9 5/8-inch surface casing will be set to protect underground source of drinking water zones. No impacts to drainage patterns are anticipated to result due to the project. The well site is not within a flood hazard, tsunami, or seiche zones, and would not risk the release of pollutants due to project inundation. The well would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The previous EIR did not find any significant impacts relating to hydrology and water quality, and the geological characterization well would not result in any new, previously unidentified impacts.

### **Land Use and Planning**

Would the Project:

- a) Physically divide an established community?*
- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The new geologic characterization well would have no potential to divide an established community, or conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The previous EIR did not find any significant impacts relating to land use and planning, and the geological characterization well would not result in any new, previously unidentified impacts.

### **Mineral Resources**

Would the Project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

Mineral resources are known to be present in the Project site. The Project site is classified as MRZ-3 and concrete aggregate (sand and gravel) are potentially present in this portion of the Project site, although it has not been determined whether significant quantities of this commodity are in fact present at this location. The EIR already analyzed a project that would develop most of the RAAP site, and the well will take only a small area. The Site is also surrounded by land uses incompatible with mining activities, including residences and agricultural land. Future use of this site for mineral extraction is unlikely and therefore implementation of the well would not result in a significant loss of available minerals at this location. There are no mines located in the Project

site. The closest active mine is the Munn and Perkins Pit, located approximately 3.8 miles to the northwest of the RAAP Site in Escalon, San Joaquin County. While the RAAP Site could potentially contain significant quantities of construction aggregate, it has not been determined that significant quantities of the commodity do in fact exist on the site. The construction of a new geologic characterization well would have no potential to affect any mineral resources within the area. The previous EIR did not find any significant impacts relating to mineral resources, and the geological characterization well would not result in any new, previously unidentified impacts.

### **Noise**

Would the Project:

- a) *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*
- b) *Generation of excessive groundborne vibration or groundborne noise levels?*
- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

Construction of the geologic characterization well would result in temporary construction noise during the 8-week drilling period. A Drilling Noise Management Plan was prepared to be implemented during construction of the proposed geologic characterization well. The plan recommended a 320 linear foot long 24-ft high sound barrier wall with a Sound Transmission Class (STC) rating of at least 25 on the partial north and east sides of the proposed site with no openings or gaps in the wall. This sound barrier wall would be implemented as a project feature and construction noise would remain within the City and County's noise thresholds. Construction noise would be temporary and no permanent increase in noise is anticipated as result of the geologic characterization well. The previous EIR found potentially significant impacts relating to noise; the geological characterization well would not result in any new, previously unidentified impacts.

### **Population and Housing**

Would the Project:

- a) *Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*
- b) *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The proposed project is a geologic characterization well and would have no potential to effect population and housing. The previous EIR did not find any significant impacts relating to population and housing, and the geological characterization well would not result in any new, previously unidentified impacts.

### **Public Services**

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered

governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- a) Fire protection?
- b) Police protection?
- c) Schools?
- d) Parks?
- e) Other public facilities?

The new geologic characterization well is not anticipated to require any public services. Construction of the geologic characterization well would not require any fire or police protections, and would have no potential to affect service ratios, response times or other performance objectives of public services. The previous EIR did not find any significant impacts relating to public services, and the temporary approximately 8-week period of drilling the geological characterization well would not result in any new, previously unidentified impacts.

### **Recreation**

Would the project:

- a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The new geologic characterization well site is not within or near any recreational facilities; therefore, there would be no potential to impact recreation. The previous EIR did not find any significant impacts relating to recreation, and the geological characterization well would not result in any new, previously unidentified impacts.

### **Transportation**

Would the Project:

- a) *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
- b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*
- c) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
- d) *Result in inadequate emergency access?*

The proposed project is a geologic characterization well and would have no effect on transportation and traffic. The previous EIR found significant impacts relating to transportation and traffic associated with major construction at the RAAP site. The traffic activity associated with the geological characterization would be relatively small compared to the traffic analyzed in the EIR, so would not result in any new, previously unidentified impacts.

### **Tribal Cultural Resources**

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place,

cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*
- b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

There are no known tribal or archaeological resources at the site of the geologic characterization well, and a records search of files at the CCIC indicated there are no recorded prehistoric cultural resources in Riverbank. Construction of the geological characterization well would have no potential to impact tribal cultural resources. The previous EIR did not analyze impacts relating to tribal cultural resources; however, the geological characterization well would not result in any new, previously unidentified impacts.

### **Utilities and Service Systems**

Would the project:

- a) *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- b) *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*
- c) *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*
- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e) *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The new geologic characterization well would not require any new utilities or service systems to be constructed. Construction of the geologic characterization well will be self-contained and would not exceed any utility or service system demands and would comply with all regulations regarding utilities or service systems. The previous EIR did not find any significant impacts relating to utilities and service systems, and the geological characterization well would not result in any new, previously unidentified impacts.

### **Wildfire**

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b) *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

As discussed in the City of Riverbank General Plan, no areas or zones in the RAAP site are defined as Very High Fire Hazard Severity, and the RAAP site is not in a State responsibility area. The well construction would not expose people, either directly or indirectly, to a significant risk of loss, injury or death involving wildfires; therefore, there would be no potential to impact wildfire. The previous EIR did not analyze impacts relating to wildfire; however, the geological characterization well would not result in any new, previously unidentified impacts.

### **Mandatory Findings of Significance**

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

The proposed geological characterization well would not result in the substantial degradation of the environment or habitat impacts and would not result in cumulative considerable or substantial direct or indirect impacts to human beings. The well drilling will be a temporary activity that is located at the same property analyzed in the EIR and the construction activity is within the envelope of activity analyzed in the EIR. The previous EIR did analyze impacts relating to cumulative impacts; however, the geological characterization well would not result in any new, previously unidentified impacts.

### **Environmental Analysis Summary**

No new significant impacts to the environment as a result of constructing the geologic characterization well have been identified.

## DETERMINATION OF APPROPRIATE CEQA DOCUMENTATION

### Section 15162 - Subsequent EIRs and Negative Declarations

a) "When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency 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 EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;"

Based on the analysis above, the addition of the geologic characterization well to the project description will not create "new significant environmental effects" or "substantially increase" "the severity of previously identified significant effects." Therefore, an addendum is appropriate under this standard.

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

The proposed modifications to the project description have been evaluated for potential environmental impact. There is nothing to indicate that circumstances have changed so that the conclusions of the EIR are no longer sufficient. The modifications to the project description are minor and would not result in a new or more severe significant environmental effect.

- 3) "New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

- A) "The project will have one or more significant environmental effects not discussed in the previous EIR or negative declaration;"

No new information is available to determine that significant environmental effects identified in the EIR were not properly analyzed.

- B) "Significant effects previously examined will be substantially more severe than shown in the previous EIR;"

No new information is available to determine that the potentially significant impacts previously discussed in the EIR would be more severe in relation to the geologic characterization well.

- 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"

Not applicable. No mitigation measures or evaluated alternatives were previously found to be infeasible in the EIR.

- D) "Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative."

Not applicable. No mitigation measures or evaluated alternatives which are considerably different from those analyzed in the EIR would substantially reduce one or more significant effects on the environment from the 2013 Final EIR.

None of the conditions listed in subsection (a) would occur due to the proposed modification. No subsequent EIR is required.

#### **Section 15164 - Addendum to an EIR or Negative Declaration**

*"(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."*

This Addendum, and the information provided herein, satisfies the requirements of this Section of the CEQA Guidelines. This Addendum provides the necessary changes to the project description of the EIR. None of the conditions described in Section 15162 calling for preparation of a subsequent EIR are present. Therefore, an addendum to the adopted EIR is the appropriate CEQA document for the proposed project modifications.

*"(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration."*

This Addendum will be attached to the approved EIR and maintained in the administrative record files at the City.

*"(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project."*

The City of Riverbank will consider this Addendum as part of the full environmental record prior to making a decision on the proposed project revision.

*"(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence."*

This document provides substantial evidence for the City of Riverbank to support the decision to prepare an Addendum for the proposed project modification.

#### **CONCLUSION**

This Addendum has been prepared in accordance with the provisions of the State CEQA Guidelines and it documents that none of the conditions or circumstances that would require preparation of a subsequent EIR, pursuant to Sections 15162 and 15164 of the State CEQA guidelines, exist in connection with the currently proposed project. No major revisions would be required to the prior environmental documents as a result of the changes to include construction of a new geologic characterization well. No new or more severe significant environmental impacts have been identified and preparation of a subsequent EIR is not needed for the proposed project.

Pursuant to the provisions of California Public Resources Code §21082.1, the City will review and analyze the information contained in this Addendum and the EIR prepared pursuant to CEQA and the State CEQA Guidelines. This Addendum and the approved EIR will be maintained in the administrative record files at the City offices.