ADDENDUM TO THE

Initial Study/Mitigated Negative Declaration Biosolids Management Plan Project

Prepared for:

City of Modesto
Utilities Department,
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September 2025

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BACKGROUND AND ACTION TRIGGERING THE ADDENDUM

IS/MND Adoption and Project Approval. In 1993, the City of Modesto (City) adopted an Initial Study/Mitigated Negative Declaration (IS/MND) for the Biosolids Management Plan Project and approved the project. The approved Biosolids Management Plan Project included the drying and transportation of digested and dried sludge (i.e., biosolids) from wastewater treatment operations conducted by the City to agricultural fields in the area. Mitigation measures were made conditions of approval and incorporated into the project. Per the 1993 IS/MND, biosolids would be used for agricultural purposes as a soil amendment and source of nutrients for field crops. The IS/MND identified three sites (5019 Maze Boulevard, 4545 West Service Road, and city-owned agricultural land along Jennings Road [hereafter referred to as the Modesto Ranch]) for potential application of biosolids. Currently, the City anaerobically digests and dries the primary solids at the Sutter Campus Primary Treatment Facility (Sutter Campus) and trucks the digested and dried Class B biosolids to the Modesto Ranch for land application. This practice generates about 2,500 dry tons of biosolids that are land applied each year on average. In addition, the City operates the Jennings Campus Secondary/Tertiary Treatment Facility (Jennings Campus). Biosolids generated at the Jennings Campus are currently treated on-site within existing ponds associated with the Jennings Campus, dredged, and mechanically dried at the Jennings Campus prior to land application on the Modesto Ranch.

The proposed modifications would occur at both of the City's Water Quality Control Facility (WQCF) and the Modesto Ranch. The Sutter Campus is located at 1221 Sutter Avenue in Modesto, at the southern terminus of Sutter Avenue. The Sutter Campus property consists of one parcel (Assessor's parcel number [APN] 037-037-001). The total land area associated with the Sutter Campus is 73 acres. The Jennings Campus is located at 7007 Jennings Road, as the western terminus of Jennings Road. The Jennings Campus property consists of ten parcels (APNs 017-061-010, 017-061-018, 017-061-022, 017-062-020, 022-001-002, 022-001-004, 022-001-007, 022-001-008, 022-001-009, and 022-001-010). The total land area associated with the Jennings Campus is approximately 1,423 acres. The Modesto Ranch is located directly south of the Jennings Campus and includes eight parcels (APNs 022-001-002, 022-001-004, 022-001-005, 022-003-002, 022-004-001, 022-004-002, 022-004-003, and 058-001-001). The total acreage for the Modesto Ranch is 2,458 acres. The total land area associated with the proposed modifications is 3,954 acres.

Summary of Minor Changes to the Project. Following approval of the Biosolids Management Plan Project in 1993, the City procured permits related to implementation of the Biosolids Management Plan Project. This addendum to the Biosolids Management Plan analyzes proposed modifications of current biosolids management on the Modesto Ranch and the potential increase of biosolids application at the Modesto Ranch. Biosolids management by the City of Modesto would continue to stay below the previously evaluated capacity of 23,000 cubic yards (approximately 22,000 dry tons) of digested and dried sludge, annually. As a result, consistent with the California Environmental Quality Act (CEQA), the City has conducted additional review of the proposed modifications to the Modesto Ranch land application area to determine whether the proposed changes would result in new or substantially more severe environmental impacts than those previously described in the 1993 IS/MND for the Biosolids Management Plan Project. Based on the results of the subsequent environmental analysis provided herein, in accordance with Section 15164 of the State CEQA Guidelines, the City has determined that preparation of an Addendum describing the proposed modifications/changes to the previously approved Biosolids Management Plan Project and adopted IS/MND would be appropriate.

PREVIOUS ENVIRONMENTAL ANALYSES

The environmental process for the Biosolids Management Plan involved the preparation of the following documents that are relevant to the consideration of the project:

- Initial Study/Mitigated Negative Declaration (IS/MND) for the Biosolids Management Plan, July 1993, State Clearinghouse No. 1993072082.

CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES REGARDING AN ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT OR NEGATIVE DECLARATION

Altered conditions, changes, or additions to the description of a project that occur after certification of an EIR or Negative Declaration may require additional analysis under CEQA only if they have the potential to result in new or more severe significant environmental impacts. The legal principles that guide decisions regarding whether additional environmental documentation is required are provided in the State CEQA Guidelines, Sections 15162 and 15164, which establish three types of documentation to address these changes: a subsequent EIR, a supplement to an EIR, or an addendum to an EIR or negative declaration.

Section 15162 of the State CEQA Guidelines describes the conditions under which a Subsequent EIR or Negative Declaration would be prepared. In summary, when an IS/MND has been adopted for a project, no subsequent environmental document 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 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 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 or Negative Declaration;

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

According to Section 15164(b) of the State CEQA Guidelines, an addendum to an adopted negative declaration may be prepared if only minor technical changes or additions to the previous analysis are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

The analysis herein is intended to determine if the project would result in the circumstances described in Section 15162 of the State CEQA Guidelines. As described in the following sections, none of the criteria for a subsequent or supplemental EIR are met; therefore, an addendum is the appropriate CEQA documentation to address the project.

This addendum evaluates each environmental topics covered in the 1993 IS/MND prepared by Brisco Enterprises, and also addresses the updated guidance for environmental analysis under CEQA that was recently adopted by the California Natural Resources Agency. As explained below, the evaluation considers, for each environmental topic, any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different (i.e., new or substantially more severe) environmental impact significance conclusion than identified in the 1993 IS/MND.

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LIST OF ABBREVIATIONS

APN	assessor's parcel number
CEQA	California Environmental Quality Act
City	City of Modesto
IS/MND	Initial Study/Mitigated Negative Declaration
Jennings Campus	Jennings Campus Secondary/Tertiary Treatment Facility
Regional Water Board	Central Valley Regional Water Quality Control Board
Sutter Campus	Sutter Campus Primary Treatment Facility
WDR	Waste Discharge Requirements
WQCF	Water Quality Control Facility

1 INTRODUCTION AND PURPOSE

1.1 INTRODUCTION

In 1993, the City of Modesto (City) adopted an Initial Study/Mitigated Negative Declaration (IS/MND) for the Biosolids Management Plan Project and approved the project. The approved Biosolids Management Plan Project included the drying and transportation of digested and dried sludge (i.e., biosolids) from wastewater treatment operations conducted by the City at the Sutter Campus Primary Treatment Facility (Sutter Campus) to agricultural fields in the area. Mitigation measures were made conditions of approval and incorporated into the project. Per the 1993 IS/MND, up to 23,000 cubic yards (approximately 22,000 dry tons) of biosolids would be used each year for agricultural purposes as a soil amendment and source of nutrients for field crops.

Currently, approximately 2,500 dry tons of biosolids generated by the Sutter Campus are applied each year to the Modesto Ranch, located adjacent to the City's Jennings Campus Secondary/Tertiary Treatment Facility (Jennings Campus). Solids generated at the Jennings Campus are currently discharged to the treatment ponds at the plant, where they are treated and stored. The City also directs Waste Activated Sludge (WAS) from the Biological Nutrient Removal (BNR)/Tertiary facilities to the facultative ponds for treatment and storage. The City removes biosolids from the ponds at the Jennings Campus through dredging. The removed biosolids are then mechanically dewatered and stored/further dried within disturbed, vacant land that was previously used for composting operations within the Jennings Campus property, prior to application within the Modesto Ranch. Between 2,500 and 8,500 dry tons of biosolids are removed from the Jennings Campus ponds each year and land applied.

The City is proposing the continued drying and land application of biosolids generated by the Sutter Campus within the Modesto Ranch. The City is also proposing continued removal, dewatering, and storage/drying of biosolids that are treated/stored in the Jennings Campus ponds and continued land application of these solids within the Modesto Ranch.

1.2 PROJECT APPROVAL

Consistent with CEQA Guidelines Section 15052(2)(a), the City, as the agency responsible for carrying out the project, will serve as the lead agency for this addendum to the Biosolids Management Plan 1993 IS/MND.

1.3 PURPOSE OF THIS DOCUMENT

The addendum is intended to evaluate and confirm CEQA compliance for proposed changes to the Biosolids Management Plan Project, which has been modified from what is described and evaluated in the IS/MND, as adopted in 1993. This addendum is organized as an environmental checklist and is intended to evaluate all environmental topic areas for any changes in circumstances or the project description, as compared to the 1993 IS/MND, and determine whether such changes were or were not adequately covered in the 1993 IS/MND. This checklist is not the traditional CEQA Environmental Checklist, that is found in Appendix G of the CEQA Guidelines. Rather, the purpose of this analysis is to evaluate the checklist categories in terms of any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different environmental impact significance conclusion from the IS/MND. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Sections 15162, 15163, 15164, and 15168.

2 PROJECT DESCRIPTION AND DESCRIPTION OF PROPOSED MODIFICATIONS

2.1 PROJECT LOCATION

The proposed modifications would occur at both campuses of the City's Water Quality Control Facility (WQCF) and city-owned agricultural fields adjacent to the Jennings Campus (i.e., Modesto Ranch). The Sutter Campus of the WQCF, is located at 1221 Sutter Avenue in Modesto, at the southern terminus of Sutter Avenue (see Figure 1). The Sutter Campus property consists of one parcel (Assessor's parcel number [APN] 037-037-001) (Figure 2). The total land area associated with the Sutter Campus is 73 acres.

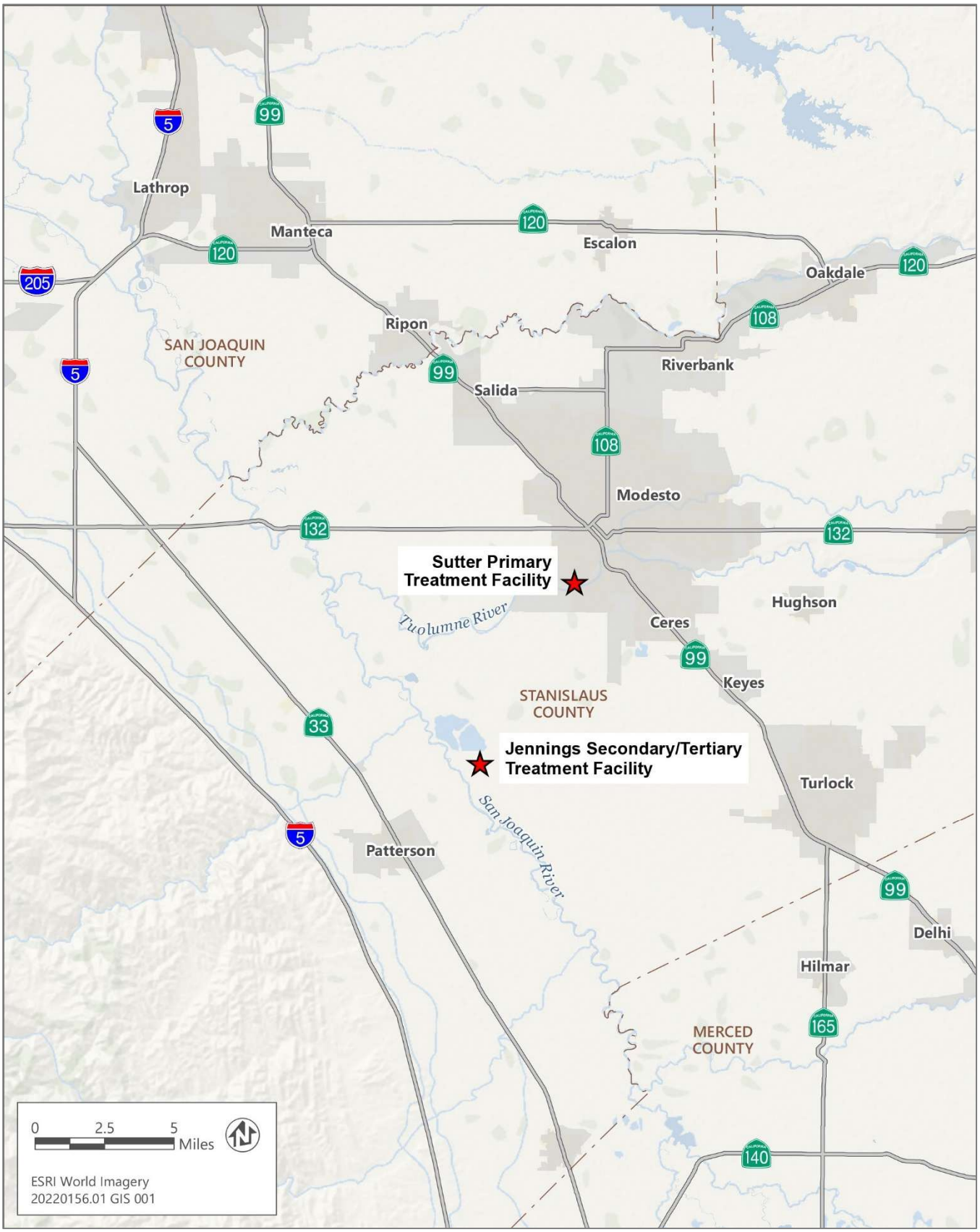
The Jennings Campus is located at 7007 Jennings Road, as the western terminus of Jennings Road (see Figure 1). The street address is 7007 Jennings Road. The Jennings Campus property consists of ten parcels (APNs 017-061-010, 017-061-018, 017-061-022, 017-062-020, 022-001-002, 022-001-004, 022-001-007, 022-001-008, 022-001-009, and 022-001-010), as shown in Figure 3. The total land area associated with the Jennings Campus is approximately 1,423 acres. Adjacent to the Jennings Campus, the Modesto Ranch is located directly south of the Jennings Campus and includes eight parcels (APNs 022-001-002, 022-001-004, 022-001-005, 022-003-002, 022-004-001, 022-004-002, 022-004-003, and 058-001-001), as shown in Figure 3. The total acreage for the Modesto Ranch is 2,458 acres. The total land area associated with the proposed modifications is 3,954 acres.

2.2 PREVIOUSLY APPROVED PROJECT

As evaluated in the 1993 IS/MND, the City previously approved a project that included the removal of 23,000 cubic yards (approximately 22,000 dry tons) of digested and dried sludge (i.e., biosolids) from its primary wastewater treatment plant, Sutter Campus. The biosolids would then be used for agricultural purposes as a soil amendment and source of nutrients to field crops. Under the previously approved project, the biosolids could be applied to land at the following addresses, 5019 Maze Boulevard, 4545 West Service Road, and the Modesto Ranch, which is city-owned agricultural land along Jennings Road. As part of the previously approved project, biosolids would be dried within the existing Sutter Campus property and trucked to agricultural land for application. Some temporary storage of biosolids at the agricultural fields may also be necessary so as not to interfere with herbicide applications and harvesting. The primary purpose of the approved project was to allow for the sustainable reuse of biosolids generated by WQCF processes and to provide an economically and environmentally superior method of biosolids disposal.

2.3 PROJECT MODIFICATIONS

The City intends to continue current biosolids drying and treatment processes at the Sutter Campus, which currently generates approximately 2,500 dry tons. Dried biosolids would continue to be transported from the Sutter Campus to the Modesto Ranch for land application, consistent with existing practices. Additionally, the City intends to continue to remove biosolids currently generated and stored within ponds at the Jennings Campus through dredging of the ponds. These biosolids would continue to be mechanically dewatered and then dried within disturbed, vacant land that was previously used for composting operations within the Jennings Campus property. Following this drying process, the biosolids would continue to be applied within the Modesto Ranch. Between 2,500 and 8,500 dry tons of biosolids are removed from the Jennings Campus ponds each year and land applied. The actual amount of biosolids removed and land applied each year depends on several factors, but the biosolids drying and application is not anticipated to exceed 11,000 dry tons (11,500 cubic yards) at both plants within a given year. This would be less than the 23,000 cubic yards (approximately 22,000 dry tons) evaluated as part of the 1993 IS/MND.



Source: adapted by Ascent Environmental in 2023.

Figure 1 Regional Location Map

Source: adapted by Ascent Environmental in 2023.

Figure 2 Sutter Campus Primary Treatment Facility

Source: adapted by Ascent Environmental in 2023.

Figure 3 Jennings Campus Secondary/Tertiary Treatment Facility

Due to the cost and timeline associated with the current practices, the City has begun investigating strategies for increasing their capacity through land application of biosolids to the Modesto Ranch year-round. The City's Biosolids Permit issued by the Central Valley Regional Water Quality Control Board (Regional Water Board) currently prohibits land application of biosolids between October 15 and May 1 (note that the 1993 IS/MND states that no land application of biosolids would occur between October 16 and April 30). The Regional Water Board is in the process of developing modified WDRs, which the City expects would allow year-round biosolids application.

The City has also recently been approached by two local municipalities regarding the feasibility of accepting Class B biosolids for land application on the Modesto Ranch. The City has reviewed the available land application capacity for the Modesto Ranch, and it is considered feasible for the Modesto Ranch to accept these biosolids from a nitrogen and metals loading perspective. The received biosolids would be temporarily stored within areas permitted to store the City's biosolids (either at the Sutter Campus or the Jennings Campus) and land applied to the Modesto Ranch. Although the area required for biosolids land application would increase with this project, the existing boundaries of Modesto Ranch are sufficient to accommodate this increase. This potential increase is considered as part of the 8,500 dry tons of biosolids for the Jennings Campus that was described above.

2.4 CONSTRUCTION

Construction of new facilities would not be required as part of the proposed modifications.

2.5 OPERATION AND MAINTENANCE

Existing operational activity includes the dredging and processing of biosolids, and commercial haul truck trips associated with land application. If biosolids are accepted from other municipalities, the project could result in additional trucks compared to existing conditions, but less than what was previously evaluated in the 1993 IS/MND. The additional trucks would be associated with transport of solids contributed from other municipalities from a temporary storage area on the Sutter or Jennings Campus to the Modesto Ranch – either similar distance or significantly shorter distance than evaluated in the 1993 IS/MND.

2.6 REQUIRED DISCRETIONARY ACTIONS

2.6.1 Lead Agency

As the lead agency, the City is responsible for approving the project modifications, at which time the City must also consider the addendum with the Negative Declaration, per State CEQA Guidelines Section 15164(d).

2.6.2 Responsible Agencies

Under CEQA, responsible agencies are State and local public agencies, other than the lead agency, that have the discretionary authority over a project or a portion of it. Trustee agencies are State agencies with legal jurisdiction over natural resources affected by a project that is held in trust for the people of the state of California.

The agency listed below may have responsibility for or jurisdiction over implementation of elements of the project. The list of agencies also identifies potential permits and other approval actions that may be required before implementation of certain project elements. The list is not intended to imply that specific permits would be required or that specific actions would occur; rather, it identifies agencies that *may* have responsibilities related to project components and the potential associated reasons.

- Central Valley Regional Water Quality Control Board – Waste Discharge Requirements (WDRs) related to the continued drying and land application of biosolids generated at the Sutter Campus and the drying and land application of biosolids generated at the Jennings Campus.

3 AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND MITIGATION MEASURES

This section of the addendum analyzes the potential effects on the existing physical environment from implementation of the proposed modifications, as compared to the approved Biosolids Management Plan Project. This analysis has been prepared to determine whether any of the conditions described above that would require preparation of an Addendum would occur as a result of the project modification.

3.1 APPROACH TO ENVIRONMENTAL ANALYSIS

As stated previously, the City has determined that, in accordance with PRC Section 21166 and Section 15164 of the State CEQA Guidelines, minor technical changes or additions to the Biosolids Management Plan IS/MND are necessary to address the modifications to the approved Project.

An addendum to an adopted IS/MND is prepared when changes to a project are required, and the changes:

- will not result in any new significant environmental effects, and/or
- will not substantially increase the severity of previously identified effects.

The analysis of environmental effects provided below addresses the same impacts addressed in the Biosolids Management Plan 1993 IS/MND. The environmental analysis evaluates for each environmental topic area (e.g., air quality, biological resources, hydrology and water quality) whether there are any changes in the project or the circumstances under which it would be undertaken that would result in new or substantially more severe environmental impacts than considered in the 1993 IS/MND.

3.1.1 Issues Not Analyzed Further in this Addendum

The proposed modifications described in this addendum constitute changes to the approved Biosolids Management Plan Project that will not result in new significant impacts not previously identified in the IS/MND, nor a substantial increase in the severity or intensity of the significant impacts that were previously identified. The proposed modifications, compared to what was previously described and evaluated in the 1993 IS/MND, would not involve an expanded area of disturbance or substantial changes to operations. For these reasons, an addendum was deemed appropriate for the proposed modifications. Resource areas that do not result in the need for additional detailed consideration therefore include:

- Aesthetics;
- Cultural Resources;
- Geology, Soils, and Mineral Resources;
- Hazards and Hazardous Materials;
- Land Use, Agriculture, and Forestry Resources;
- Employment, Population, and Housing;
- Geology, Soils, Seismicity, Minerals, and Paleontology;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Land Use, Agriculture, and Forestry Resources;
- Noise;
- Transportation; and
- Utilities.

Moreover, the proposed modifications are located within active WQCF property and agricultural land and would continue to be subject to the regulations and requirements associated with the existing operations. In particular, the proposed modifications would represent a continuation of existing conditions. In all cases, the area has been previously disturbed, excavated, and recompacted numerous times during the history of WQCF and agricultural operations at the subject properties. As a result, no new ground disturbance that could otherwise disturb certain resources, including cultural and tribal cultural resources, would occur.

In addition, the proposed modifications would not result in an increase in capacity of organics processing at either WQCF beyond what was previously evaluated in the 1993 IS/MND nor would they result in higher visibility of operations from external viewpoints. The proposed modifications would not involve temporary (construction-related) activities in addition to what was previously evaluated in the 1993 IS/MND, and none of the contemplated project modifications would affect the previously disclosed operational impacts of the Biosolids Management Plan Project.

Further, the mitigation identified in the adopted IS/MND to reduce impacts would be implemented at the Sutter Campus, Jennings Campus, and Modesto Ranch as well as compliance with applicable WDRs to prevent additional or more substantial impacts. As noted below, one adopted mitigation measure, related to Aleutian Canada Geese and described below, is no longer considered applicable to the Biosolids Management Project because the identified species is considered recovered and no longer listed as an endangered species by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS).

3.1.2 Issues Carried Forward for Further Analysis in This Addendum

The following issue areas have been evaluated in further detail in this addendum with respect to the proposed modifications to the approved Biosolids Management Plan Project, because of the potential for the modification to adversely affect these resources:

- Biological Resources, and
- Hydrology and Water Quality.

3.2 EXPLANATION OF FURTHER ANALYSIS CATEGORIES

The purpose of this checklist, as tailored for biological resources, and hydrology and water quality, is to evaluate the categories in terms of any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in environmental impact significance conclusions different from those found in the Biosolids Management Plan Project IS/MND. The row titles of the checklist include a range of environmental topics, which generally include those presented in Appendix G of the State CEQA Guidelines for biological and cultural resources. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Section 15162. A "no" answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact that was analyzed and addressed with mitigation measures in the Biosolids Management Plan Project IS/MND. For instance, the environmental categories might be answered with a "no" in the checklist because the impacts associated with the project were adequately addressed in the Biosolids Management Plan Project IS/MND, and the environmental impact significance conclusions of the 1993 IS/MND remain applicable. The purpose of each column of the checklist is described below.

3.2.1 Where Impact was Analyzed

This column provides a cross-reference to the pages of the 1993 IS/MND where information and analysis may be found relative to the environmental issue listed under each topic.

3.2.2 Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?

Pursuant to Section 15162(a)(1) of the State CEQA Guidelines, this column indicates whether the changes represented by the current project may result in (1) new significant impacts that have not already been considered in the prior environmental review document, or (2) a substantial increase in the severity of a previously identified impact. If "Yes," then preparation of a subsequent IS/MND or supplement to the IS/MND would be required.

3.2.3 Any New Circumstances Involving New or Substantially More Severe Significant Impacts?

Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (circumstances under which the project is undertaken) that have occurred subsequent to the prior environmental documents, which would result in the project having new significant environmental impacts that were not considered in the prior environmental documents or having substantial increases in the severity of previously identified significant impacts. If "Yes," then preparation of a subsequent IS/MND or supplement to the IS/MND would be required.

3.2.4 Any New Information Requiring New Analysis or Verification?

Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether 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 environmental documents were certified or adopted as complete, is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigation measures remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that 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) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, the question would be answered "Yes," requiring the preparation of a subsequent IS/MND or supplement to the IS/MND. However, if the additional analysis completed as part of this Environmental Checklist Review finds that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or previously identified significant environmental impacts are not found to be substantially more severe, the question would be answered "No" and no additional IS/MND documentation (supplement to the IS/MND or subsequent EIR IS/MND) would be required.

3.2.5 Do Prior Environmental Documents Mitigations Address/Resolve Impacts?

This column indicates whether mitigation measures in the 1993 IS/MND or new mitigation measures identified in the additional analysis completed as part of this Environmental Checklist Review have been adopted to address effects in the related impact category. In some cases, the mitigation measures have already been implemented.

3.3 DISCUSSION AND MITIGATION SECTIONS

3.3.1 Discussion

A discussion of the elements of the checklist is provided under each environmental category to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

3.3.2 Mitigation Measures

Applicable mitigation measures from the prior environmental review that would apply to the proposed amendment are listed under each environmental category. New mitigation measures are included, if needed.

3.3.3 Conclusions

A discussion of the conclusion relating to the need for additional environmental documentation is contained in each section.

3.4 BIOLOGICAL RESOURCES

	Environmental Issue Area	Where Impact Was Analyzed in the 1993 IS/MND	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
Would the proposed modifications:						
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 or U.S. Fish and Wildlife Service?	p. 25 through 27 of the IS/MND	No	No	No	Mitigation related to Aleutian Canada geese is no longer applicable.
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	p. 25 and 27 of the 1993 IS/MND	No	No	No	Mitigation related to weed control will be implemented.
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	p. 25 and 27 of the 1993 IS/MND	No	No	No	No mitigation is necessary.
d)	Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	p. 27 of the 1993 IS/MND	No	No	No	Mitigation related to Aleutian Canada geese is no longer applicable; No mitigation is necessary.
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Not previously analyzed	No	No	No	No mitigation is necessary.
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?	Not previously analyzed	No	No	No	No mitigation is necessary.

PRIOR ANALYSIS

With respect to biological resources, the adopted Biosolids Management Plan 1993 IS/MND determined that, with mitigation, potentially significant impacts may occur with respect to the introduction of weeds, which could affect native species and/or agricultural crops in the area, and operational impacts to Aleutian Canada goose. Of note, the Aleutian Canada goose was first listed as endangered in 1967, reclassified as threatened in 1990, and then delisted due to recovery in 2001 (after adoption of the 1993 IS/MND for the Biosolids Management Plan Project). All other biological resource impacts were determined to be either no impact or less than significant. The following discussion provides a brief summary of the biological resources analysis provided in the IS/MND.

3.4.1 Discussion

a) With implementation of the Biosolids Management Plan Project, the IS/MND determined that operational activities associated with the application of biosolids to agricultural lands could result in the ingestion of biosolids by Aleutian Canada geese during migration. The geese have the potential to be in the area between November and April. It was noted that no correlation of disease to geese from ingestion of biosolids has ever been shown. However, mitigation measure 5-b-a was adopted so as to require the project to operate in a manner that would not provide the opportunity for ingestion of solids by the geese. With implementation of the mitigation measures, impacts were reduced to less than significant. Since adoption of the IS/MND, Aleutian Canada geese were delisted and are no longer considered a special status species; as a result, the aforementioned mitigation measure is no longer considered applicable to the Biosolids Management Plan Project and can be removed and no longer implemented.

   The IS/MND also determined that the application of biosolids within existing agricultural practices would not result in the loss of sensitive habitat or otherwise result in impacts to special status species. As the proposed modifications would represent a continuation of existing practices at Sutter Campus and an expansion of biosolids management practices within Jennings Campus and Modesto Ranch, but wholly within existing disturbed areas that are owned and operated by the City of Modesto, no additional impacts to special status species would occur.

b) The proposed modifications would take place within either existing disturbed/active areas of the Sutter Campus and Jennings Campus or within existing agricultural land (on the Modesto Ranch). As a result, no disturbance of sensitive habitat (i.e., special status natural community or riparian habitat) would occur as a result of implementation of the proposed modifications. Further, the 1993 IS/MND identified one mitigation measure related to the introduction of weeds to the project area. Because not all weeds are destroyed through existing wastewater treatment and biosolids drying practices, the IS/MND identified a potential for new species to be introduced in the area. As a result, mitigation related to the inspection for weeds and implementation of weed control within all biosolids drying areas was adopted and would be considered applicable to the proposed temporary storage of biosolids from other municipalities. With implementation of these mitigation measures, impacts were reduced to be less than significant, consistent with the findings of the 1993 IS/MND, and no further mitigation is necessary.

c) Within the proposed modifications areas, no wetlands are present. The proposed biosolids drying, temporary storage, and application areas are existing disturbed areas within either WQCF or active agricultural land. As a result, implementation of the proposed modifications would not result in the removal of or otherwise impacts to wetlands that may be located in the area. Of note, WDRs associated with the proposed modifications would further ensure the appropriate control and treatment of biosolids to ensure that off-site impacts do not occur. As a result, no impacts are anticipated as a result of the proposed modifications, and no mitigation is necessary.

d) As noted above under Item 3.4.1.a), mitigation was adopted as part of the 1993 IS/MND related to the potential for the Biosolids Management Plan Project to impact the migration of Aleutian Canada geese, which were also a special status species at the time of the previous analysis. However, the proposed modifications would not result in the interference of or otherwise impact migration patterns of species through the area. No new ground

disturbance or loss of habitat connectivity would occur. Therefore, no impacts would occur as a result of the proposed modifications, and the previous mitigation measure associated with Aleutian Canada goose is no longer considered applicable. No mitigation is necessary.

e) Although this impact was not previously analyzed in the 1993 IS/MND, the project would involve the continuation and expansion of WQCF activities within the existing WQCF. As no sensitive habitat or species are anticipated to be affected by the proposed modifications, the project would be considered consistent with applicable plans and policies related to protecting biological resources. As a result, no impact would occur, and no mitigation is necessary.

f) Although this impact was not previously analyzed in the 1993 IS/MND, no adopted habitat conservation plans or natural community conservation plans are adopted for the project area. As a result, the proposed modifications would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur, and no mitigation is necessary.

MITIGATION MEASURES

The following mitigation measures were adopted as part of the 1993 IS/MND and would be considered applicable to the proposed modifications:

- Continue efforts of Stanislaus County Agricultural Commissioner to prevent vegetables contaminated with undesirable weed seeds from entering the county from elsewhere.
- Inspect solids as they dry in the drying beds and remove undesirable weeds before they produce seeds.
- Develop and implement a weed control system for elimination of all weeds in the area of the biosolids drying beds by means of annual preemergent application and maintenance spraying.
- Monitor for weed growth in fields after application.

The following mitigation measure was adopted as part of the 1993 IS/MND but, due to changes in circumstances, is no longer considered applicable to the Biosolids Management Plan Project. As a result, the following mitigation measure is removed:

- Applications on all fields will be done between May 1 and October 15, as long as geese are not present.

CONCLUSION

Since the 1993 IS/MND was adopted, no new circumstances with the exception of delisting of Aleutian Canada goose have occurred nor has any new information been found requiring new analysis or verification. Therefore, the conclusions of the adopted IS/MND remain valid and approval of the project would not result in new or substantially more severe significant impacts to biological resources. As noted previously, mitigation related to the prohibition of biosolids between October 16 and April 30 is no longer considered applicable and is removed.

3.5 HYDROLOGY AND WATER QUALITY

Environmental Issue Area	Where Impact Was Analyzed in the 1993 IS/MND	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents Mitigations Address/Resolve Impacts?
Would the proposed modifications:					
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	p.23 and 24 of the 1993 IS/MND	No	No	No	Yes
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	p.22 and 24 of the 1993 IS/MND	No	No	No	No mitigation is necessary.
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 on- or offsite erosion or siltation;	p. 20, 22, and 23 of the IS/MND	No	No	No	No mitigation is necessary.
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;		No	No	No	No mitigation is necessary.
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		No	No	No	No mitigation is necessary.
iv) Impede or redirect flood flows?		No	No	No	No mitigation is necessary.
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	p. 24 and 25 of the 1993 IS/MND	No	No	No	No mitigation is necessary.
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Not previously analyzed	No	No	No	No mitigation is necessary.

PRIOR ANALYSIS

With respect to hydrology and water quality, the 1993 IS/MND determined that, due to regulatory compliance requirements, the previously approved project would largely result in no or less-than-significant impacts. Mitigation measures were adopted for the previously approved with respect to limiting the off-site transport of biosolids as applied to agricultural fields. These measures included maintaining a buffer zone of at least 10 meters from any surface water course, appropriate dust control, limiting the application of biosolids to areas with less than a two-percent slope, capturing and reuse of tailwater, and appropriate seals of agricultural wells. No significant and unavoidable impacts would occur through regulatory compliance, and no mitigation measures were required or adopted as part of the project. The following discussion provides a brief summary of the hydrology and water quality analysis provided in the 1993 IS/MND.

3.5.1 Discussion

a) The 1993 IS/MND determined that although the proposed areas for biosolids treatment and application were located within existing upland agricultural areas or active portions of a WQCF, the potential for off-site transport of biosolids required mitigation to ensure that it did not affect water quality conditions in the area. Because the proposed modifications would involve the temporary storage of biosolids in areas that are currently used as either land application or drying areas, no additional impacts are anticipated. Existing and future biosolids drying, handling, and application would be subject to WDRs (as noted above) but the adopted mitigation measures from the 1993 IS/MND would be considered applicable. Continued implementation of the aforementioned mitigation measures would ensure that water quality in the area would not be affected due to possible runoff contamination of surface water with sediments and non-degradable constituents. As a result, impacts would remain less than significant with mitigation, and no further mitigation is necessary.

b) The 1993 IS/MND evaluated potential impacts to groundwater and determined that the use of biosolids will not change irrigation or other practices to the extent that the direction or rate of groundwater flow will change. Similarly, no excavations, cuts, additions or withdrawals from a groundwater aquifer are needed or anticipated to manage the use of biosolids, including with implementation of the proposed modifications. There would continue to be little or no water to impact groundwater quantity as a result of implementation of the proposed modifications. As a result, impacts would be less than significant consistent with the findings of the adopted 1993 IS/MND, and no mitigation is necessary.

c) The 1993 IS/MND evaluated the potential for the project to alter the existing drainage pattern of the Sutter Campus and Modesto Ranch and runoff. Impacts related to runoff and drainage were found to be less than significant. With respect to the proposed modifications, additional grading or otherwise modification of the Sutter Campus and Modesto Ranch would not be required beyond that anticipated under the 1993 IS/MND. With respect to Jennings Campus, the proposed modifications would occur within active/disturbed areas of the property and further modification/grading of the area is not anticipated. As a result, none of the proposed modifications would result in changes in drainage patterns, the addition of substantial impervious areas, or the alteration of a river or stream. Therefore, the proposed modifications are similar to the approved project evaluated in the 1993 IS/MND, and the proposed modifications would not result in new or substantially more severe impacts than those analyzed in the 1993 IS/MND, and no mitigation is necessary.

d) With respect to flood hazards, including dam inundation and seiche risks, the 1993 IS/MND evaluated the potential impacts related to risk of release of pollutants due to project inundation during a flood event and concluded that the use of biosolids does not involve activities which would expose humans or property to water related hazards. As noted previously, the project would involve the expansion of biosolids management beyond what was previously anticipated, but would not involve the expansion of biosolids management activities into new areas that are at risk of flooding. As a result, no new impacts would occur. No mitigation is necessary.

e) Although the 1993 IS/MND did not evaluate this threshold, the proposed modifications would involve changes increased biosolids application within the Modesto Ranch, but less than what was previously anticipated in the

1993 IS/MND. Further, the Modesto Subbasin groundwater sustainability plan includes the Sutter Campus; however, project activities (under the proposed modifications) would continue in a manner similar to existing conditions at the Sutter Campus and are not anticipated to result in a potential conflict with existing groundwater management activities. As the proposed modifications would not involve additional withdrawals of groundwater as a result of implementation and would comply with applicable WDRs to prevent impacts to groundwater quality, no new significant impacts are anticipated as a result of implementation of the proposed modifications. No mitigation is necessary.

MITIGATION MEASURES

The following mitigation measures were adopted as part of the 1993 IS/MND and would be considered applicable to the proposed modifications:

- A buffer zone of at least 10 meters shall be maintained between application areas and surface water courses.
- Dust control practices will be implemented to mitigate surface water impacts from airborne solid particles.
- Biosolids shall be applied to surface irrigated fields with less than two percent slope.
- Tailwater will be captured and reused on the site.
- Agricultural wells shall be provided with sanitary seals, and a berm will be placed around the well at least 50-foot radius from the well and shall be maintained for 30 days after application.

CONCLUSION

No new circumstances or project changes have occurred nor has any new information been found requiring new analysis or verification. The project as now proposed would not result in new or substantially more severe significant impacts to hydrology and water quality and the conclusions of the 1993 IS/MND remain valid, and no new mitigation is required.

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5 LITERATURE CITED

City of Modesto. 1993. Initial Study/Mitigated Negative Declaration for Biosolids Management Plan. State Clearinghouse Number 1993072082.