

WATER+ TREATMENT PLANTS AND RESILIENCY AND IMPROVEMENTS PROJECT

Addendum to the Environmental Impact Report
State Clearinghouse No. 2022040138

Prepared for
City of Sacramento

June 2026



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2600 Capitol Avenue
Suite 200
Sacramento, CA 95816
916.564.4500
esassoc.com



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Appendices

- A. Biological Resources Supplemental Survey Memorandum
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SECTION 1

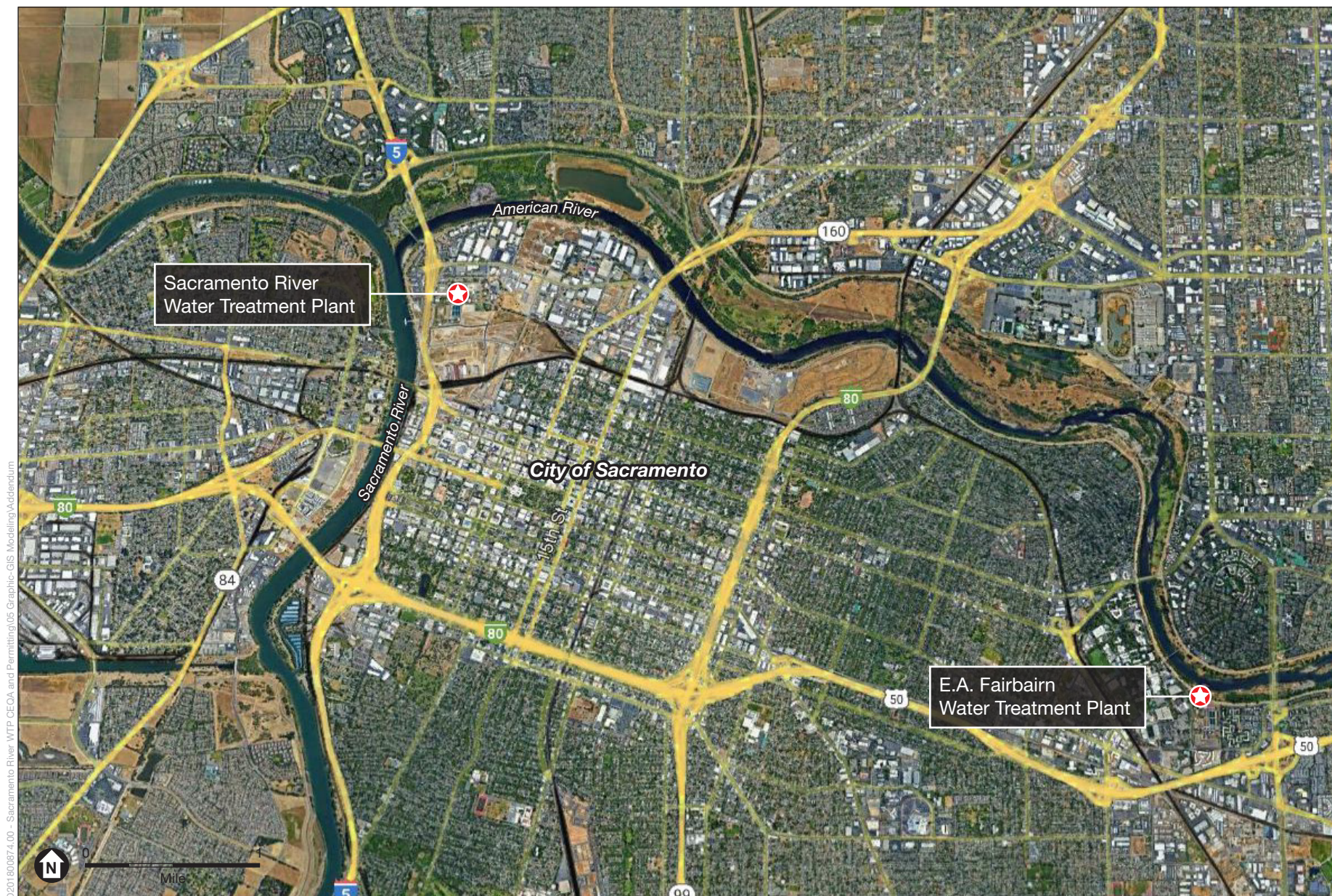
Background and Purpose of this Addendum

1.1 Background

The City of Sacramento (City) is implementing the Water+ Treatment Plants Resiliency and Improvements (Water+) Project to provide treatment resiliency for changing water quality in both the American and Sacramento Rivers, to address reliability of the City's water treatment plants and raw water supply facilities with infrastructure currently approaching the end of its useful life, and to meet the projected potable water demands. The City's water treatment plants and raw water supply facilities are located within the City of Sacramento (see **Figure 1**, Regional Location Map).

As the lead agency, the City prepared and circulated a Draft Environmental Impact Report (EIR) on the Water+ Project (State Clearinghouse [SCH] #2022040138) in accordance with the requirements of the California Environmental Quality Act (CEQA). The Notice of Preparation (NOP) for the EIR was published on Wednesday April 6, 2022, and sent to public agencies, organizations, and individuals that requested receipt of the City's public notices, to invite them to provide input. The Draft EIR was published on June 20, 2025. An official 45-day public review period for the Draft EIR ended August 4, 2025. The City received five letters during the comment period. On April 14, 2026, the City certified the Final EIR; adopted CEQA findings, a statement of overriding considerations, and a mitigation monitoring and reporting program (MMRP); approved the Water+ Project; and filed the Notice of Determination (NOD) with the State Clearinghouse on April 21, 2026.

Since certification of the Water+ Project EIR (certified EIR) and project approval (approved project), the City has proposed changes to the approved project that include: (1) expansion of the existing Sacramento River Water Treatment Plant (SRWTP) property through incorporation of an approximately two acre City-owned parcel (new area) located adjacent to eastern boundary of the SRWTP; and (2) adjusting the location of the new gravity thickeners infrastructure to this new area (proposed changes). Because the expansion of the SRWTP property and adjustment of the gravity thickeners infrastructure location to this new area was not evaluated in the certified EIR, this Addendum is being prepared to assess potential environmental impacts of these proposed changes to the approved project. All other components of the approved project remain unchanged.



SOURCE: Carollo, 2022

City of Sacramento's Water+ Treatment Plants Resiliency and Improvements Project

Figure 1
Regional Location Map

1.2 Purpose of the EIR Addendum

Section 15160 of the CEQA Guidelines explains that CEQA allows a lead agency to tailor an environmental document to different situations and intended uses. Specifically, Section 15160 allows lead agencies to tailor the use of CEQA mechanisms (such as this Addendum) to fit the circumstances presented to the lead agency by a project or changes to a project. The City has prepared this Addendum to assess the minor changes to the approved project that are necessary since preparation of the certified EIR, in accordance with Section 15164. According to Section 15164(a) of the CEQA Guidelines, the lead agency or a 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 requiring preparation of a subsequent EIR have occurred. Section 15162 of the CEQA Guidelines lists the conditions that would require the preparation of a subsequent EIR rather than an addendum. These include 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;
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 of 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.

This Addendum concludes that the minor changes to the approved project (i.e., expanding the SRWTP property boundary and adjusting the construction and operation location of the new gravity thickener infrastructure to this new area) does not trigger any of the CEQA Guidelines Section 15162 conditions described above, and that the preparation of an addendum therefore is appropriate.

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SECTION 2

Description of Project Changes

2.1 Project Overview

The general objective of the approved project is to provide a reliable, resilient, and safe water supply while meeting the City's projected potable water demand. The approved project involves several components including treatment plant improvements at the SRWTP. The approved project will occur over multiple phases starting with an initial phase to occur between 2027 and 2038 and ending with project buildout to occur between 2039 and 2050.

Improvements approved to be constructed and operated within the SRWTP property include:

- Replacement of aging infrastructure at the end of its effective life to support treatment reliability.
- Integration of ozone treatment into the treatment process to increase its resiliency in addressing changing river water quality conditions and reducing the formation of disinfection byproducts.
- Conversion from chlorine gas to sodium hypochlorite as the primary chemical for disinfection of water to support the safety of the facilities for City staff and the public, as well as increase resiliency against issues with chemical availability.
- Increase in treatment capacity¹ in a phased manner to support projected water demand within the City's service area.

2.2 Project Changes

Since certification of the EIR and project approval, the City proposes changes to the approved project that include an expansion of the existing eastern boundary of the SRWTP property to incorporate an approximately two-acre adjacent City-owned parcel (Assessor Parcel Number 001-0061-026-0000) (new area). The proposed changes also include adjusting the construction and operation location of the new gravity thickeners infrastructure (see number 18 in Table 2-2 and Figure 2-5 in Chapter 2, *Project Description*, of the certified EIR) at this new area. **Figure 2** shows the proposed changes to the approved project. The new gravity thickeners would be moved into the new area to provide additional space between these tanks for improved operational and maintenance access, and to reduce impact to the existing sludge drying area. The new area would include hardscape to accommodate the gravity thickeners and support maintenance activities. In addition, new vegetated areas or swales would be established along the perimeter of the new area to provide stormwater management.

¹ During the initial phase, the approved project will increase the treatment capacity of the SRWTP from 160 MGD to 235 MGD (an increase of 75 MGD). The buildout phase will be staged to meet the increasing water demands of the City's service area through 2050, for an ultimate SRWTP treatment capacity of 310 MGD (a total increase of 150 MGD). Refer to Chapter 2, *Project Description*, of the certified EIR for additional details regarding the approved project.



SOURCE: NAIP 2022, ESA, 2024

City of Sacramento's Water+ Treatment Plants Resiliency and Improvements Project

Figure 2
Sacramento River Water Treatment Plant Project Area

No new treatment infrastructure, beyond what is already included in the certified EIR, is proposed to be added at the SRWTP under this Addendum.

Construction considerations and operation and maintenance (O&M) activities are described below.

2.2.1 Construction Considerations

Existing vegetation on the new area would be cleared and any remnant concrete (remaining after the structures were demolished in 2024) would be removed to accommodate the construction of the new gravity thickeners. Site preparation and construction activities would be consistent with those described for the approved project in Chapter 2, *Project Description*, subsection 2.5 of the certified EIR and would involve the same construction materials and equipment at the SRWTP described in the certified EIR and presented in Chapter 2, *Project Description*, Tables 2-3, 2-4, 2-5, and 2-6. Site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that associated with the approved project. As needed, during construction, dust control measures would include the use of water trucks to spray down exposed dirt piles and trenches. Other best management practices would include the installation of silt fences and waddles, a truck washdown area, and mud removal treads for outgoing traffic from construction areas. No additional staging areas would be required.

No additional equipment, workforce, or vehicle trips for construction activities at the SRWTP would be required beyond that which was already described in the certified EIR. The proposed changes would occur within the approved project's schedule and phasing for the SRWTP between January 2027 and January 2035 (refer to Table 2-7 of the certified EIR).

2.2.2 Operation and Maintenance

Once construction is complete, O&M activities at the SRWTP associated with the new gravity thickeners infrastructure and drainage swales relocated to the new area would be the same as the approved project (i.e., generally similar to existing O&M activities). No additional employees or truck trips would be needed beyond that which was already described in the certified EIR.

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SECTION 3

Analysis of Potential Environmental Effects

3.1 Introduction

The certified EIR evaluated potential environmental impacts in the following resource categories: aesthetics; agricultural resources; air quality; aquatic biological resources; terrestrial biological resources; cultural resources; energy; geology, soils, paleontological resources, and mineral resources; greenhouse gas (GHG) emissions; hazards and hazardous materials; hydrology, water quality, and water supply; land use and planning; noise and vibration; public services; recreation; transportation; tribal cultural resources; utilities and service systems; and wildfire.

These issues are re-evaluated in this Addendum considering the proposed changes to the approved project. This evaluation determines whether implementation of the proposed changes would result in any new significant impacts or substantially more severe impacts than identified in the certified EIR. The resource sections in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*, of the certified EIR describe the criteria used to determine the significance of environmental impacts (see Sections 3.2 through 3.20). All mitigation measures identified in the certified EIR for construction and operation of improvements at the SRWTP were adopted by the City as conditions of approval. All applicable mitigation measures and permits will also apply to the proposed changes to the approved project evaluated in this Addendum.

As described in Section 2.2.2, the proposed changes to the approved project would not result in changes to O&M activities described in the certified EIR. The new area would be an extension of the SRWTP property and O&M associated with the new gravity thickeners infrastructure would not change. Therefore, the approved project as changed would not result in additional O&M impacts at the SRWTP, and the certified EIR adequately addresses O&M impacts. Therefore, impacts associated with O&M activities are not further evaluated in this Addendum.

As described in Section 2.2.1, proposed changes to the approved project would involve the same staging areas and access, construction activities, construction materials and equipment, and construction workforce at the SRWTP consistent with the approved project; and therefore, associated impacts are adequately evaluated in the certified EIR. However, while general construction activities are adequately evaluated in the certified EIR, site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that associated with the approved project. In addition, to accommodate the relocation of the gravity thickeners to the new area, additional hardscape would be installed within the SRWTP property. Furthermore, adjusting the location of the new gravity thickeners would result in that infrastructure being installed at a different location within the SRWTP property than what was identified in the approved project and evaluated in the certified EIR.

As a result, the analysis in this Addendum evaluates potential impacts of construction of the proposed changes on the following resource areas: aesthetics (adjusting the location of the new gravity thickeners to the new area); air quality (increased ground disturbance associated with the new area); terrestrial biological resources (new area of ground disturbance); cultural resources (new area of ground disturbance); geology, soils, paleontological resources, and mineral resources (increased ground disturbance associated with the new area); hazards and hazardous materials (new area of ground disturbance); hydrology, water quality, and water supply (increased construction-related degradation of water quality due to soil erosion and increased runoff associated with additional impervious surface cover); noise and vibration (new area of construction related noise and operation of gravity thickeners); tribal cultural resources (new area of ground disturbance); and utilities and service systems (additional stormwater drainage associated with the additional impervious surface cover). The evaluation of each of these resource areas are described below.

3.2 Effects Related to Project Changes

The following resource topics have been re-evaluated to determine whether the proposed changes to the approved project would result in any new significant impacts or substantially more severe impacts than those described in the certified EIR.

3.2.1 Aesthetics

Section 3.2, *Aesthetics*, of the certified EIR concluded that construction activities would result in the presence and movement of equipment, vehicles, and personnel for varying periods of time in various locations within the SRWTP property. These activities could result in temporary, short-term loss of visual quality and cohesion within the SRWTP property for sensitive viewers (e.g., recreationists and residents), but these transient and temporary effects would not result in permanent or substantial effects to the existing visual character or quality. The analysis also concluded that proposed water treatment plant improvements would be constructed within the SRWTP property and would be consistent with current uses and would not substantially degrade the existing visual character or quality of public views of the SRWTP and its surroundings or conflict with applicable zoning and other regulations governing scenic quality. As a result, it was determined that implementation of the approved project, including proposed water treatment improvements at the SRWTP, would not substantially degrade the existing visual character of the SRWTP property or the quality of public views or conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts related to existing visual character or quality would be less than significant.

Changes to the approved project include site preparation and construction activities associated with adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. Site preparation and installation of the gravity thickeners at the new area would involve the same staging areas, access and construction activities at the SRWTP as the approved project. Adjusting the location of the new gravity thickeners would be located within the expanded SRWTP property east of the location identified in the approved project and evaluated in the certified EIR. Therefore, the proposed changes would result in similar impacts as those identified for the approved project as described in the certified EIR. In addition, there are no changes in the environmental setting, regulatory setting or project characteristics that would result in new or substantially more severe aesthetic impacts.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified aesthetic impacts.

3.2.2 Air Quality

Section 3.4, *Air Quality*, of the certified EIR concluded that construction activities within the SRWTP property could result in short-term and intermittent emissions of criteria air pollutants primarily from construction equipment exhaust and fugitive dust generated during site preparation and grading activities. Emissions from construction activities associated with the proposed water treatment plant improvements were estimated for each year of construction activity (refer to Impact 3.4-3, Tables 3.4-8 through 3.4-10). The total emissions generated from construction activities of the approved project would not exceed Sacramento Management Air Quality Management District (SMAQMD) thresholds for any of the pollutants analyzed for any year during the construction. Particulate matter (PM) in size fractions of 10 microns or less in diameter (PM₁₀) and 2.5 microns or less in diameter (PM_{2.5}) were modeled assuming incorporation of SMAQMD best management practices (BMPs) during construction to help reduce fugitive dust emissions. However, if those BMPs are not implemented, emissions could exceed the thresholds. The certified EIR concluded that implementation of Mitigation Measures 3.4-1(a) and 3.4-1(b), including the use of CARB Tier 4 Final equipment and fugitive dust control BMPs, would reduce these impacts to less than significant.

Changes to the approved project with this Addendum include site preparation and construction activities associated with adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. Site preparation and construction activities would be consistent with those described for the approved project and would involve the same construction materials and equipment at the SRWTP described in the certified EIR. No additional equipment, workforce, or vehicle trips for construction activities at the SRWTP would be required. However, site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that associated with the approved project. The additional earth disturbance would result in a minor increase in temporary fugitive dust emissions than associated with the approved project. As described above, estimates of PM₁₀ and PM_{2.5} emissions associated with construction of the proposed water treatment plant improvements are below SMAQMD thresholds and the additional two acres of site preparation would not result in an increase in fugitive dust emissions in excess of these thresholds. As a result, the proposed changes would result in similar impacts as those identified for the approved project as described in the certified EIR, and implementation of Mitigation Measure 3.4-1(b) would reduce impacts associated with PM₁₀ and PM_{2.5} emissions to less than significant. In addition, there are no changes in the environmental setting, regulatory setting, or project characteristics that would result in new or substantially more severe air quality impacts.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified air quality impacts.

3.2.3 Biological Resources – Terrestrial

Section 3.6, *Biological Resources – Terrestrial*, of the certified EIR concluded that construction activities within the SRWTP property could impact nesting migratory birds and birds of prey and valley elderberry longhorn beetle (VELB). As described in the certified EIR, these impacts would be potentially significant; however, implementation of Mitigation Measures 3.6-1, 3.6-2(a) and 3.6-2(b), including preconstruction

surveys, establishment of avoidance buffers, biological monitoring, transplanting and compensatory mitigation for elderberry shrubs, and compliance with applicable regulatory permits, would reduce these impacts to less than significant with mitigation. The certified EIR also concluded that construction activities within the SRWTP property would not impact riparian habitat or waters of the U.S. or State, as these resources are not present within the SRWTP boundary.

Changes to the approved project include site preparation and construction activities associated with adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. Site preparation and construction activities would be consistent with those described for the approved project and would involve the same construction materials and equipment at the SRWTP described in the certified EIR. However, site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that associated with the approved project. Construction activities in this area could impact nesting migratory birds and birds of prey and VELB.

A biological resources survey of the new area was conducted by an ESA biologist on May 1, 2026 (refer to Appendix A). Consistent with the surveys conducted for the approved project, the surveys were conducted in the new area where construction activities were expected to occur, and existing habitat types, plants, and wildlife species were recorded. The survey found trees and shrubs onsite that provide potential habitat for nesting birds and raptors protected by the Migratory Bird Treaty Act and Fish and Game Code, as well as state threatened Swainson's hawk (*Buteo swainsonsi*) and state fully protected white-tailed kite (*Elanus leucurus*). Trees onsite are located on City property and thus are considered City trees per the City of Sacramento tree ordinance (City Code Title 12, Chapter 12.56, Ordinance 2016-0026 Section 4). No elderberries (*Sambucus mexicana*) or habitat for the federally threatened valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) occur on the site. Additionally, no special-status natural communities, including wetlands, waters, and riparian, are present. No other habitat for special-status species is present in the new area.

Therefore, the proposed changes would result in similar impacts as those identified for the approved project as described in the certified EIR. Implementation of Mitigation Measures 3.6-1 would reduce impacts to nesting migratory birds and birds of prey in the new area to less than significant. Implementation of Mitigation Measure 3.6-5 would avoid and minimize impacts to protected trees in the new area to less than significant. In addition, there are no changes in the environmental setting, regulatory setting, or project characteristics that would result in new or substantially more severe impacts to terrestrial biological resources.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified terrestrial biological resource impacts.

3.2.4 Cultural Resources

Section 3.7, *Cultural Resources*, of the certified EIR concluded that construction of the approved project could result in impacts to historical resources, archaeological resources, and human remains. Cultural resources identified within the SRWTP property include historic-era architectural resources, historic-era archaeological resources, and the potential for unknown buried resources. Two historical resources within the SRWTP were determined eligible for listing in the National and California Registers. Construction-

related activities at the SRWTP, including demolition of contributing elements, construction adjacent to historic structures, and potential vibration effects, were determined to result in a significant and unavoidable impact to historical resources due to changes to the setting and integrity of the SRWTP. However, implementation of Mitigation Measures 3.7-1(a) through 3.7-1(d), including compliance with the Secretary of the Interior's Standards, vibration monitoring and protection measures, and documentation through HABS-level recordation, would reduce impacts where feasible, although impacts to historical resources at the SRWTP would remain significant and unavoidable.

Impacts to archaeological resources were determined to be potentially significant due to the possibility of encountering previously undiscovered subsurface resources during ground-disturbing activities. However, implementation of Mitigation Measures 3.7-2(a) through 3.7-2(c), including worker training, procedures for inadvertent discovery, evaluation by a qualified archaeologist, and avoidance or data recovery where necessary, would reduce impacts to less than significant. Impacts to human remains were also determined to be potentially significant due to the possibility of encountering previously undiscovered subsurface resources during ground-disturbing activities. However, implementation of Mitigation Measure 3.7-3, requiring compliance with State laws and procedures for the treatment of human remains, including coordination with the County Coroner and Native American Heritage Commission, would reduce impacts to less than significant.

Changes to the approved project include site preparation and construction activities associated with adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. Because existing structures on the new area have previously been removed, there would be no impact to historic resources. Site preparation and construction activities would be consistent with those described for the approved project and would involve the same construction materials and equipment at the SRWTP described in the certified EIR. However, site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that associated with the approved project. These activities could potentially affect unknown buried archeological resources and/or human remains, resulting in similar impacts as those identified for the approved project as described in the certified EIR.

On May 1, 2026, an ESA archeologist completed a pedestrian survey of the new area to revisit previously recorded cultural resources and determine the presence of additional cultural resources (refer to Appendix B). No historical resources or unique archaeological resources were identified in the new area and no new impacts to historical resources or unique archaeological resources are anticipated by the proposed changes to the approved project.

Therefore, the proposed changes would result in similar impacts as those identified for the approved project as described in the certified EIR. Implementation of Mitigation Measures 3.7-2(a) through 3.7-2(c), and 3.7-3 would reduce impacts to cultural resources to less than significant. In addition, there are no changes in the environmental setting, regulatory setting, or project characteristics that would result in new or substantially more severe impacts on cultural resources.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified cultural resource impacts.

3.2.5 Geology, Soils, Paleontological Resources, and Mineral Resources

Section 3.9, *Geology, Soils, Paleontological Resources, and Mineral Resources*, of the certified EIR concluded that construction activities within the SRWTP property would result in less than significant impacts related to seismic hazards, geotechnical hazards (e.g., liquefaction), and expansive soils. Construction within the SRWTP property could result in temporary soil erosion and/or the loss of topsoil due to earth-disturbing activities (e.g., excavation, trenching, grading). However, compliance with the State Construction General Permit and the City's Grading Ordinance, preparation of a Stormwater Pollution Prevention Plan (SWPPP), and adherence to site-specific BMPs (e.g., developing an erosion and sediment control plan) would reduce potential impacts to less than significant. While the City is not highly sensitive for paleontological resources and thus there exists little potential for the SRWTP property to contain these resources, the City is required to adhere to General Plan policy HCR-1.1 (Preservation of Historic and Cultural Resources Site Features and Landscaping) should paleontological resources be discovered during excavation or construction. Therefore, the certified EIR concluded less than significant impacts to paleontological resources.

Changes to the approved project include site preparation and construction activities associated with the adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. Site preparation and construction activities would be consistent with those described for the approved project and would involve the same construction materials and equipment at the SRWTP described in the certified EIR. However, site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that associated with the approved project. Earth disturbance in the additional two acres could result in an increase in soil erosion and loss of topsoil compared to the approved project. However, the proposed changes would result in similar impacts on soil erosion and loss of topsoil as those identified for the approved project as described in the certified EIR. Compliance with the State Construction General Permit and City's Grading Ordinance, preparation and implementation of a SWPPP, and adherence to applicable BMPs, would reduce impacts to less than significant.

Earth disturbing activities at the new area would result in an increase in potential to encounter paleontological resources. However, based on the low sensitivity and requirements to City General Plan policy HCR-1.1, this impact would be less than significant consistent with the approved project. In addition, there are no changes in the environmental setting, regulatory framework, or project characteristics that would result in new or substantially more severe geology, soils, paleontological resources, and mineral resources impacts.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified geology, soils, paleontological resources, and mineral resources impacts.

3.2.6 Hazards and Hazardous Materials

Section 3.11, *Hazards and Hazardous Materials* of the certified EIR concluded that construction within the SRWTP property would result in less than significant impacts related to the use, transport, and disposal of hazardous materials; the handling of hazardous materials within one-quarter mile of an existing school; exposure to contaminated sites; and wildfire risks. Construction of the SRWTP improvements would

involve the routine use of hazardous materials such as fuels, oils, solvents, and other chemicals; however, compliance with federal, state, and local regulations governing hazardous materials handling, storage, transport, and disposal would ensure that impacts would be less than significant. There are no schools located within a quarter of a mile of the SRWTP property, therefore, there would be no impact associated with the treatment plant improvements at the SRWTP. There are no active clean-up sites within the fence line of the SRWTP, and therefore excavation and other earthwork near the site would not be anticipated to disturb contaminated soil that would create a significant hazard to the public or the environment. The SRWTP is located within a relatively flat, urban, developed area; therefore, uncontrolled spread of wildfire would not be anticipated. Construction activities at the SRWTP could interfere with emergency response or emergency evacuation routes and were determined to result in potentially significant impacts. However, implementation of Mitigation Measure 3.11-1 that requires a Traffic Control Plan and coordination with emergency service providers would reduce this impact to less than significant.

Changes to the approved project include site preparation and construction activities associated with adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. Site preparation and construction activities would be consistent with those described for the approved project and would involve the same construction materials and equipment at the SRWTP described in the certified EIR. No additional equipment or vehicle trips for construction activities at the SRWTP would be required. Because construction activities would be consistent with the approved project, there would not be an increased risk of exposure associated with the storage, use or transport of hazardous materials or construction-related wildfires. Site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that of the associated with the approved project. The new area is not identified as an active clean-up hazardous materials site (DTSC, 2026; State Water Resources Control Board, 2026); therefore, the addition of this new area would not result in potential release of hazardous materials associated with an active/open clean-up site over that identified in the certified EIR. Furthermore, construction activities would be subject to compliance with existing regulations which would ensure that hazardous materials associated with construction activities would be properly stored, handled, transported and disposed of.

Construction activities at the new area would not result additional equipment or vehicle trips; therefore, temporary increases in traffic on designated emergency access or evacuation routes that could impair emergency access would be the same as the approved project, and implementation of Mitigation Measure 3.11-1 would reduce the impact to less than significant. In addition, there are no changes in the environmental setting, regulatory setting, or project characteristics that would result in new or substantially more severe hazards impacts.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified hazards and hazardous materials impacts.

3.2.7 Hydrology, Water Quality, and Water Supply

Section 3.12, *Hydrology, Water Quality, and Water Supply*, of the certified EIR evaluated potential impacts on hydrology and water quality resulting from construction of the proposed water treatment plant

improvements within the SRWTP property.² The certified EIR concluded that construction within the SRWTP property could result in impacts related to surface water quality, including violation of water quality standards or waste discharge requirements due to erosion and sedimentation during construction, as well as potential degradation of surface water quality during post-construction operation. Construction activities associated with the proposed water treatment plant improvements would involve ground disturbance, grading, and excavation, which could result in erosion, sedimentation, and the discharge of pollutants into stormwater runoff. However, compliance with the State Construction General Permit, preparation and implementation of a SWPPP, and adherence to site-specific BMPs (e.g., developing an erosion and sediment control plan) would reduce potential water quality impacts to less than significant.

The certified EIR also concluded that construction within the SRWTP property would not substantially alter the existing drainage patterns of the site nor would it decrease groundwater supplies or interfere substantially with groundwater recharge at the basin-scale. Construction would occur in previously disturbed areas with established drainage patterns routing stormwater to existing stormwater systems. Structures associated with the SRWTP improvements would be constructed at-grade unless there exists a need to facilitate gravity flow of water across the structure, in which case part or all of the structure would be located below grade. A minor amount of additional impervious surface would be constructed (e.g., existing pervious/grassy areas that would be permanently converted to impervious area). Following construction, these areas would be landscaped and on-site detention structures would be installed to ensure any additional stormwater flows that are created due to new impervious surfaces needed for the various project improvements are detained on-site with runoff routed to the existing stormwater drainage system.

Changes to the approved project include site preparation and construction activities associated with adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. Site preparation and construction activities would be consistent with those described for the approved project and would involve the same construction materials and equipment at the SRWTP described in the certified EIR. However, site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that associated with the approved project resulting in an increase potential for runoff containing sedimentation, and pollutant discharge to adversely affect receiving water quality. Consistent with the approved project, the City would comply with the State Construction General Permit, prepare and implement a SWPPP, and install site-specific BMPs during construction, including silt fences and wattles, to limit sedimentation and pollutants from entering receiving waters. The new area would include hardscape to accommodate the gravity thickeners and support maintenance activities, resulting in a minor increase in runoff compared to the approved project. New vegetated areas or swales would be established along the perimeter of the new area to provide stormwater management. The new hardscape within the additional two acres would not result in a substantial increase in runoff compared to the approved project.

As a result, the proposed changes would result in similar impacts as those identified for the approved project as described in the certified EIR. Compliance with the State Construction General Permit, preparation and implementation of a SWPPP, and adherence to applicable BMPs, would reduce impacts to hydrology and water quality to less than significant. In addition, there are no changes in the

² The certified EIR evaluated water supply impacts on operation of the new water intake, an approved project component that is not changing and therefore is not discussed in this Addendum.

environmental setting, regulatory framework, or project characteristics that would result in new or substantially more severe hydrology and water quality impacts.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified hydrology and water quality impacts.

3.2.8 Noise and Vibration

Section 3.14, *Noise and Vibration*, of the certified EIR concluded that both daytime and nighttime construction of proposed water treatment plant improvements within the SRWTP property would generate a substantial temporary increase in ambient noise levels in excess of standards established in the City's General Plan or noise ordinance, and applicable standards of other agencies. The certified EIR concluded that implementation of Mitigation Measure 3.14-1 would reduce construction-related noise impacts by limiting construction hours, requiring properly muffled equipment, restricting high-noise activities to daytime hours, and incorporating shielding or barriers where feasible. However, nighttime construction noise associated with the water treatment plant improvements could remain significant and unavoidable. The certified EIR also concluded that construction of the water treatment plant improvements at the SRWTP would not generate a substantial temporary vibration effect and therefore impacts were less than significant.

Changes to the approved project include site preparation and construction activities associated with adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. Site preparation and construction activities would be consistent with those described for the approved project and would involve the same construction materials and equipment at the SRWTP described in the certified EIR. The construction activities within the new area would occur further east than the approved project and could generate a substantial temporary increase in ambient noise levels at adjacent uses (e.g., the Union Gospel Mission). However, because construction activities would involve similar equipment, construction methods, and sequencing, it would not result in a substantial change in the type, intensity, or duration of construction activities previously analyzed in the certified EIR.

Therefore, the proposed changes would result in similar impacts as those identified for the approved project as described in the certified EIR. Implementation of Mitigation Measure 3.14-1 would reduce impacts associated with temporary construction noise, but the impact would remain significant and unavoidable because it is unlikely that these measures would be sufficient to reduce nighttime noise below sleep interference levels during nighttime hours. Construction activities at the new area would not generate a substantial temporary vibration effect. In addition, there are no changes in the environmental setting, regulatory framework, or project characteristics that would result in new or substantially more severe noise or vibration impacts.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified noise and vibration impacts.

3.2.9 Tribal Cultural Resources

Section 3.18, *Tribal Cultural Resources*, of the certified EIR concluded that construction of the approved project may cause a substantial adverse change to tribal cultural resources, including previously unidentified resources that could be encountered during ground-disturbing activities within the SRWTP property. Although no known tribal cultural resources listed or eligible for listing in the California Register or a local register were identified within the SRWTP property, consultation with culturally affiliated Tribes and a search of the Native American Heritage Commission Sacred Lands File indicated that portions of the SRWTP property are sensitive for tribal cultural resources and may include Sacred Lands.³ Therefore, construction activities involving ground disturbance could result in potentially significant impacts to tribal cultural resources. The certified EIR concluded that implementation of Mitigation Measures 3.18-1(a) through 3.18-1(c) would reduce impacts to tribal cultural resources to less than significant. These measures include requirements for tribal cultural resources awareness training (Worker Environmental Awareness Program), procedures for halting work and evaluating discoveries of potential tribal cultural resources in coordination with culturally affiliated Tribes, and the retention of qualified Tribal Monitors during ground-disturbing activities to assist in the identification and protection of tribal cultural resources.

Changes to the approved project include site preparation and construction activities associated with the relocation of the gravity thickeners to the new area to be incorporated into the SRWTP property. Site preparation and construction activities would be consistent with those described for the approved project and would involve the same construction materials and equipment at the SRWTP described in the certified EIR. However, site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that associated with the approved project. Additionally, site preparation activities could potentially affect unknown buried tribal cultural resources and/or human remains, resulting in similar impacts as those identified for the approved project as described in the certified EIR. Implementation of Mitigation Measures 3.18-1(a) through 3.18-1(c) would reduce impacts to tribal cultural resources to less than significant. In addition, there are no changes in the environmental setting, regulatory framework, or project characteristics that would result in new or substantially more severe impacts to tribal cultural resources.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified tribal cultural resources impacts.

3.2.10 Utilities and Service Systems

Section 3.19, *Utilities and Service Systems*, of the certified EIR concluded that construction of the water treatment plant improvements within the SRWTP property would result in less than significant impacts related to the need to relocate or construct new utilities and service systems (i.e., water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunications facilities); and generation of solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure. Construction would result in additional impervious areas that could increase stormwater

³ As part of the certified EIR, the City sent tribal outreach letters on April 29, 2022, to Native American representatives on the City's Assembly Bill (AB) 52 consultation list, in accordance with the requirements of Public Resources Code (PRC) Section 21080.3.

runoff. However, the additional stormwater runoff would be routed to the existing stormwater drainage system and thus would be accommodated by existing and/or new infrastructure and would not require or result in the need for new or expanded facilities beyond those that are part of the approved project.⁴

Changes to the approved project include site preparation and construction activities associated with adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. The new area would include hardscape to accommodate the gravity thickeners and support maintenance activities, consistent with the approved project. In addition, new vegetated areas or swales would be established along the perimeter of the new area to provide stormwater management. The additional stormwater runoff generated from the new hardscape would be minimal and routed to the existing drainage system and thus accommodated by either existing or infrastructure constructed as part of the approved project. Therefore, the proposed changes would result in similar impacts associated with drainage as those identified for the approved project as described in the certified EIR. In addition, there are no changes in the environmental setting, regulatory setting or project characteristics that would result in new or substantially more severe new utilities and service systems impacts.

Changes to the approved project would not alter the conclusions of the certified EIR, result in any new significant impacts, or substantially increase the severity of the previously identified utilities and service systems impacts.

3.2.11 Cumulative Impacts

Chapter 4, *Cumulative Impacts*, of the certified EIR, evaluated the significance of the approved project's contribution to potential significant cumulative impacts. As described in Chapter 4, the certified EIR concluded that construction of the water treatment plant improvements within the SRWTP property could result in significant cumulative effects to: air quality; terrestrial biological resources; cultural resources; geology, soils, paleontological resources and mineral resources; hydrology, water quality, and water supply; and tribal cultural resources. The approved project's contribution to these significant cumulative impacts on these resources in the SRWTP property would be reduced to less than consideration with compliance with existing regulations (e.g., State Construction General Permit, the City's Grading Ordinance, General Plan policy HCR 1.1) as well as implementation of Mitigation Measures 3.4-1(b) (air quality); 3.6-1, 3.6-2(a), 3.6-2 (b) and 3.6-5 (terrestrial biological resources); 3.7-2(a) through 3.7-2(c) and 3.7-3 (cultural resources); 3.11-1 (hazards and hazardous materials); and 3.18-1(a) through 3.18-1(c) (tribal cultural resources). Therefore, the approved project's contribution to potentially significant cumulative impacts on these resources would not be considerable and would be a less-than-significant cumulative impact.

The certified EIR concluded that construction of the water treatment plant improvements within the SRWTP property would result in significant and unavoidable impacts on noise and vibration. Implementation of Mitigation Measure 3.14-1 would reduce temporary increases in noise generated by construction activities during daytime hours but would not likely reduce nighttime noise below sleep interference levels during nighttime hours. Therefore, the approved project's contribution to potentially

⁴ Refer to Chapter 2, *Project Description*, of the certified EIR for a description of stormwater drainage upgrades at the SRWTP included as part of the approved project.

significant cumulative impacts on noise would be considerable and would be a significant and unavoidable cumulative impact.

Changes to the approved project with this Addendum include site preparation and construction activities associated with adjusting the location of the new gravity thickeners to the new area to be incorporated into the SRWTP property. Site preparation and construction activities would be consistent with those described for the approved project and would involve the same construction materials and equipment at the SRWTP described in the certified EIR. No additional equipment, workforce, or vehicle trips for construction activities at the SRWTP would be required. However, site preparation of the new area would result in a minor increase in vegetation removal and soil disturbance than that associated with the approved project and therefore could result in: a minor increase in temporary fugitive dust emissions; potential impacts to nesting migratory birds and birds of prey, and City trees; potential impacts to historic-era archaeological resources, tribal cultural resources, or unknown buried resources; potential increases in soil erosion and loss of topsoil; changes to surface water quality; and temporary construction noise that exceeds sleep interference levels during nighttime hours.

As a result, compliance with the same regulations for the approved project (e.g., State Construction General Permit, the City's Grading Ordinance, General Plan policy HCR 1.1), and implementation of Mitigation Measures 3.4-1(b), 3.6-1, 3.6-5, 3.7-2(a) through 3.7-2(c), 3.7-3, 3.11-1, and 3.18-1(a) through 3.18-1(c) would reduce the contribution to cumulative impacts to a less than considerable level, resulting in less than significant cumulative impacts. Implementation of Mitigation Measure 3.14-1 would not likely reduce nighttime noise below sleep interference levels during nighttime hours. Therefore, consistent with the approved project, the project changes contribution to potentially significant cumulative impacts on noise would be considerable and would be a significant and unavoidable cumulative impact.

The proposed changes do not alter the underlying impact conclusions or cumulative assumptions of the certified EIR. Therefore, there would be no change in the cumulative effects of the proposed changes to the approved project. None of the significance conclusions or findings in the certified EIR would be altered, result in any new significant impacts, or substantially increase the severity of the previously identified cumulative impacts.

3.3 Conclusion

This Addendum documents that the proposed changes (expansion of the existing SRWTP property and location adjustment of the new gravity thickeners infrastructure to this new area) would not result in any new or more severe impacts than those evaluated in the certified EIR, as updated by this Addendum. None of the conditions or circumstances that would require preparation of a subsequent or supplemental EIR pursuant to Public Resources Code Section 21166 exists for the approved project with these changes.

SECTION 4

References

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Appendix A
**Biological Resources
Supplemental Survey
Memorandum**



2600 Capitol Avenue
Suite 200
Sacramento, CA 95816
916.564.4500 [phone](tel:916.564.4500)
916.564.4501 [fax](tel:916.564.4501)

esassoc.com

memorandum

date May 11, 2026

to Megan Thomas, City of Sacramento

cc Catherine McEfee, ESA; Kelley Sterle, ESA

from Jessica Orsolini, ESA

subject Biological Resources Supplemental Survey Memorandum for the City of Sacramento Water+ Treatment Plants Resiliency and Improvement Project

This memorandum summarizes the results of a biological resources survey conducted in an expanded area of the Sacramento River Water Treatment Plant (SRWTP) property for the City of Sacramento (City) Water+ Treatment Plants Resiliency and Improvements (Water+ Project). A Draft Environmental Impact Report (EIR) was prepared for the Water+ Project in 2025 and the Final EIR was certified by the City on April 14, 2026. The biological survey and this memorandum supplement the survey results and analysis described in the certified EIR to include the expanded area of the SRWTP property. The expanded area consists of an approximately two acre City-owned parcel (new area) located along the eastern boundary of the SRWTP along Bannon Street. The survey of the new area was conducted by ESA biologist, Jessica Orsolini, on May 1, 2026.

The survey site is located in a highly disturbed area. The site formerly contained a structure, playground, and paved parking areas, roads, and pathways. At the time of the survey, all infrastructure had been removed except for a paved parking lot in the southeast corner and paved roads/paths along the northern and western edges. Vegetation onsite consisted primarily of nonnative herbaceous ruderal species in the understory, landscaped oleander (*Nerium oleander*) shrubs along the northern edge, and a mix of native and nonnative trees in the overstory. Common herbaceous species onsite include Bermuda grass (*Cynodon dactylon*), bull mallow (*Malva nicaeensis*), musk filaree (*Erodium moschatum*), prickly lettuce (*Lactuca serriola*), field bindweed (*Convolvulus arvensis*), toothed medick (*Medicago polymorpha*), American pokeweed (*Phytolacca americana* var. *americana*), asthmaweed (*Erigeron bonariensis*), and fluvellin (*Kickxia elatine*). Trees onsite were dominated by nonnative landscaped trees including silk tree (*Albizia julibrissin*), pepper tree (*Schinus molle*), ornamental pines (*Pinus* sp.), a row of landscaped Italian cypress (*Cupressus sempervirens*), American sweetgum (*Liquidambar styraciflua*), Mexican fan palm (*Washingtonia robusta*), and common hackberry (*Celtis occidentalis*). Three large native black walnuts (*Juglans hindsii*) also occurred on the site. A row of fruit trees consisting of apple (*Malus domestica*), peach (*Prunus persica*), and lemon (*Citrus limon*) occurred near the southern end of the site.

Trees and shrubs onsite provide potential habitat for nesting birds and raptors protected by the Migratory Bird Treaty Act and Fish and Game Code, as well as state threatened Swainson's hawk (*Buteo swainsonsi*) and state fully protected white-tailed kite (*Elanus leucurus*). Mitigation Measure 3.6-1 of the certified EIR protects nesting birds, including Swainson's hawks and white-tailed kites, from potential impacts. Implementation of Mitigation Measure 3.6-1 is sufficient to also avoid impacts to nesting birds, including Swainson's hawks and white-tailed kites, in the new area.

Trees onsite are located on City property and thus are considered City trees per the City of Sacramento tree ordinance (City Code Title 12, Chapter 12.56, Ordinance 2016-0026 Section 4). All City trees are protected under the ordinance. Mitigation Measure 3.6-5 of the certified EIR avoids and mitigates impacts to trees protected by the City ordinance. Implementation of Mitigation Measure 3.6-5 will also avoid and minimize impacts to protected trees in the new area.

No elderberries (*Sambucus mexicana*), which provide habitat for the federally threatened valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), occur on the site. Additionally, no special-status natural communities, including wetlands, waters, and riparian, are present. No other habitat for special-status species is present in the new area.

Appendix B

Confidential

Cultural Resources Supplemental Survey Memorandum