SK FOODS

CEQA INITIAL STUDY

2 May 2007

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TABLE OF CONTENTS

INTRODUCTION 1
Purpose 2
Sources 2

DISCUSSION OF INITIAL STUDY CHECKLIST 4

LIST OF FIGURES

Figure 1. Project Location 3
Figure 2. FEMA Flood Zones 14

APPENDICES

Appendix A Environmental Checklist Form
Appendix B EDR NEPA Check
Appendix C Parcel List

INTRODUCTION

The purpose of this Initial Study is to provide the necessary California Environmental Quality Act (CEQA) documentation to support SK Foods' purchase of an approximately 2,597-acre property from the Westlands Water District (WWD). The Regional Water Quality Control Board (Regional Water Board) will act as the lead agency in adoption of this Initial Study and Waste Discharge Requirements (WDRs).

SK Foods operates a tomato processing plant in Lemoore, California. The SK Foods facility currently land applies wastewater during the fresh pack season (July through early October) onto an 860-acre land application area owned by Westlake Farms, located to the southeast of the facility. The proposed 2,597-acre property will replace the existing land application site. The proposed 2,597-acre property is already used for agricultural purposes. For the purposes of this study, wastewater includes:

- process water from the processing of tomatoes;
- cleaning and disinfecting wash and rinse water;
- water softener regenerant; and
- boiler blowdown.

SK Foods proposes to land apply both the seasonal bulk process (paste/dice) line and year-round food process (retail) line wastewater flows to the proposed property. During the fresh pack season, July through early October, wastewater from the bulk process and food process lines will be pumped from the facility to the proposed land application site. During the off-season, late October through June, wastewater from the food process line would be temporarily stored at the facility and intermittently pumped to the proposed land application site. SK Foods has submitted, under separate cover, a Report of Waste Discharge requesting new WDRs from the Regional Water Board to allow land application of wastewater to the proposed property.

This CEQA Initial Study addresses the operation and management of the proposed land application system. The project area and parcel numbers are shown in Figure 1. A National Environmental Protection Act (NEPA) search was conducted by Environmental Data Resources (EDR) to provide information to determine whether the project site or proposed wastewater reuse operations would have significant environmental effects. The NEPA investigation area is shown in Figure 1. A table listing the project area parcels and corresponding assessor parcel numbers, size, and section-township-range designations is included as Appendix C.

Wastewater from the tomato processing facility will be reused for crop irrigation on the proposed property. Wastewater will be pumped into head ditches and distributed by ridge and furrow. Planting and harvesting will be staggered to allow continual irrigation

during drying and harvesting activities. Daily monitoring of flow rate and application schedules will be used to calculate mass balances to demonstrate that the quantity of wastewater and organic material applied will not exceed the capacity of the land. Wastewater will be blended with irrigation water to meet the irrigation requirement of the crop.

Purpose

Section 15063 of the CEQA Guidelines provides for preparation of Initial Studies. The purpose of an Initial Study is to:

1. Provide the lead agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or Negative Declaration.
2. Enable an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling a project to qualify for a Negative Declaration.
3. Assist in the preparation of an EIR, if one is required.
4. Facilitate environmental assessment early in the design of a project.
5. Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment.
6. Eliminate unnecessary EIRs.
7. Determine whether a previously prepared EIR could be used with the project.

Sources

The primary source of information for this Initial Study is the EDR NEPA Check, Report of Waste Discharge, and monitoring data collected from the operation of the existing land application facility. The monitoring reports and Report of Waste Discharge are part of public record and are available for review at the Regional Water Board's offices.

California Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, California 93706

Environmental Data Resources, Inc.
EDR NEPA Check in Appendix B

Figure 1. Project Location

DISCUSSION OF INITIAL STUDY CHECKLIST

The following discussion provides an evaluation of the environmental factors listed in the environmental checklist form (Appendix A), which may be potentially affected by the project. A brief explanation is provided for each factor in the order presented in the environmental checklist form.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	X	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	X

I. a, b, d) The project would not affect a scenic vista, damage scenic resources, or create a new source of light or glare.

I. c) The proposed site will be planted with a variety of annual crops, which would not diminish the visual quality of the site and is consistent with the agricultural nature of surrounding areas. Thus, the impact is less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	X

c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	X

II. a - c) The site would not be converted to a non-agricultural use. The proposed land application site is currently developed agricultural land and would be operated to grow a variety of crops such as corn, winter wheat, sudan grass, and alfalfa. The project would introduce needed organic material. The use of the site as proposed would be consistent with existing zoning (General and Exclusive Agriculture).

Crop management is a critical factor in operating and maintaining a land application system. Healthy and productive crops are required to remove nutrients and salts as part of the treatment of applied wastewater. Much of the crop management is accomplished in the same way for land application sites as conventional agricultural operations. Crops will be rotated to allow for cultivation between crops, irrigation with wastewater, and harvesting of crops. Discharging wastewater to the farmland provides a majority of the crop needs for water and nutrients. Supplemental water and fertilizers will be added as required to maintain a healthy crop.

Daily monitoring of the land application fields during the tomato processing season will be conducted. Observations and required mitigation measures will be submitted in monthly reports to the Regional Water Board as required by the Monitoring and Reporting Program (MRP) to be adopted as part of the new WDR.

SK Foods currently operates 860 acres of farmland as a land application site for disposal of tomato process wastewater. The following crop yields were recorded for the 2003, 2004, and 2005 harvesting seasons:

Crop	2003 Harvest		2004 Harvest		2005 Harvest	
	Wet Ton	Dry Ton	Wet Ton	Dry Ton	Wet Ton	Dry Ton
Tomatoes	--	--	18,564	3,494	17,680	3,536
Wheat, Silage	--	--	463	185	--	--
Corn, Silage	10,536	4,200	1,651	852	3,165	1,646
Safflower	--	--	--	--	123	99

III. AIR QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	X

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	X
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	X
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	X
e) Create objectionable odors affecting a substantial number of people?	☐	☐	X	☐

III. a - c) The project would not conflict with the local air quality plan, violate any air quality standard, or result in a cumulatively considerable net increase of any criteria pollutant.

III. d - e) The Project should not expose sensitive receptors to substantial pollutant concentrations or create objectionable odors that affect a substantial number of people. There are no known sensitive receptors within the vicinity of the proposed property. New WDRs, to be issued by the Regional Water Board, typically require that any objectionable odors originating at the land application site not be perceivable beyond the limits of the property.

Potential sources of nuisance odors include anaerobic conditions within the distribution pipeline, stagnant puddles or pools of wastewater allowed to stand on the land application field (especially during hot weather), or saturation of the soil with wastewater due to hydraulic overloading and/or insufficient drying times between applications. Various onsite management measures shall be incorporated in to the project to minimize the potential for nuisance odors.

The wastewater will pass through one 0.020-inch rotary screen prior to discharge from the processing facility. The screens remove coarse solids and organic matter from the wastewater, which will eliminate or reduce solids build up on the irrigated land, which would otherwise become a significant source of odors. An additional benefit screening offers is to reduce plugging of the distribution system piping and valves. Screening also serves to increase the dissolved oxygen concentration of the wastewater through mechanical aeration prior to discharge for land application.

Wastewater will be applied to the land application areas at rates to allow the water to infiltrate within 48 hours, a requirement the Regional Water Board includes in all new WDRs. Minimum drying cycles determined by the expected

hydraulic and organic loadings will maximize oxygen transfer through the soil, lead to aerobic conditions, and reduce the potential for odor issues.

Water balances were conducted for both normal-year and 100-year precipitation scenarios to determine the hydraulic capacity of the land. Precipitation, wastewater, and supplemental water for crop irrigation were incorporated into the water balance to ensure that the additional hydraulic loading would not exceed typical soil loading limitations.

The new MRP to be adopted by the Regional Water Board will require process wastewater and supplemental flow rates to be recorded. Land application areas will also be inspected at least daily during irrigation events. Monitoring observations will be documented for inclusion in monthly monitoring reports submitted to the Regional Water Board. In addition, any other relevant field conditions and corrective actions (i.e. pipeline flushing, pipe/valve repair, etc.) taken will be recorded. If standing water or odors from the fields are observed, the frequency of rotation of the irrigated checks would be increased to reduce the time wastewater is applied to a given field, thereby minimizing soil saturation and reducing potential for odors.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	X
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?	☐	☐	☐	X

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	X
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?	☐	☐	☐	X

IV. a – f) The project would not impact any sensitive or special status biological species, riparian habitats, sensitive natural communities, federally protected wetlands, or interfere with the movement of native or migratory wildlife species. In addition, the project would not conflict with any local policies or ordinances protecting biological resources or adopted conservation plans. The proposed property is currently in agricultural production and is located in an area zoned for agricultural production. No wildlife impacts are expected as the land is already in agricultural usage. The EDR NEPA investigation, contained in Appendix B, provides information on search results for the project area regarding natural areas and biological resources.

V. CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☐	☐	X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☐	X
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	X
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	X

V. a-d) The project would not impact cultural resources. There are no resources within the project area, which are included in a local register of historical resources to be presumed to be historically or culturally significant. Additionally, the project is not within an area of geological or historical resource. The proposed property is

located in an area zoned for agricultural production. The EDR NEPA investigation, contained in Appendix B, provides information on search results for the project area regarding cultural and historical resources.

VI. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	X	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	X	☐
ii) Strong seismic ground shaking?	☐	☐	X	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	X	☐
iv) Landslides?	☐	☐	X	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	X	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	X	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	X	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	X

VI. a - d) The project site is not located in an Alquist-Priolo Special Studies Zone designated by the California Department of Conservation, Division of Mines and Geology. Therefore, it is not susceptible to rupture of a known earthquake fault. Because the project site is not located in close proximity to an active fault, there is a low potential for the project site to experience seismic activity, including strong seismic ground shaking, which could cause structural and nonstructural

damage to the proposed project. The project is located on flat land and is not susceptible to landslide hazards. Therefore, implementation of the proposed project would not expose persons or structures to landslide-related risks. Agricultural activities will introduce organic material needed to return the fields to a prime and would not result in soil erosion or loss of topsoil.

VI. e) The proposed project is anticipated to have no such impact.

VII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where	☐	☐	☐	X

wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

VII. a - h) The Project does not use hazardous materials, does not create hazardous wastes, nor does it have any other characteristics that could create hazards to the public or the environment.

VIII. HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	X	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	X	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	X	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	X	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	X	☐
f) Otherwise substantially degrade water quality?	☐	☐	X	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	X

j) Expose people or structures to a significant risk of loss injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	X
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	X

VIII. a, f) The Regional Water Board will issue WDRs for the proposed land application area with compliance limits to protect existing groundwater. The wastewater being reused for irrigation will be monitored regularly. The monitoring will help in process control and ensure that the effluent can be safely applied to the cropping system. In addition, SK Foods has installed a monitoring well network at the project site. A groundwater sampling program has been initiated to characterize the shallow groundwater quality underlying the project site prior to discharging wastewater. Some degradation of the shallow groundwater may occur; however, no impact of its uses is expected.

Normal-year and 100-year rainfall water balances were performed to determine the supplemental water required for crop production and to demonstrate that the projected process flow rates would not exceed the capacity of the land. The project site would be divided into separate management units for better control of irrigation and harvesting practices. Planting and harvesting of management units will be staggered to allow continual irrigation during drying and harvesting activities. The project area would be more than adequate to meet the combined hydraulic load from the tomato processing facility and the supplemental water required for crop growth.

A site investigation was conducted on August 30 and 31, 2006. Twelve soil borings were drilled with a direct push rig. Three soil samples were collected from each boring at depths ranging from 0.5 to 5 feet below ground surface. A shallow groundwater sample was also collected from 11 of the 12 borings. The samples were considered representative of background conditions underlying the project site. Analytical results from the site investigation are discussed in the Report of Waste Discharge. Shallow groundwater underlying the proposed land application site exceeds many of the drinking water and agricultural water quality objectives and limits. The applied wastewater typically has lower constituent concentrations compared with the background conditions, especially in regards to dissolved solids and nutrient concentrations. Site investigation results indicate the wastewater application will not impact the underlying regional shallow groundwater due to the elevated background concentrations. As such, potential groundwater quality impacts are reduced to a less-than-significant level.

VIII. b) Groundwater at the site may be used to supplement wastewater in order to meet the crop irrigation demand. SK Foods will have water rights to 2,000 acre-feet per year from the water supply wells onsite. If required, additional water can be purchased from WWD and distributed through WWD irrigation canals. Use of groundwater for this purpose, typically limited to the processing season between

July and October, would not interfere substantially with groundwater recharge or result in a net deficit of aquifer volume.

VIII. c, d) The proposed land application area would be prepared by SK Foods to accommodate land application. Some amount of regrading would occur and a system of checks would be installed to facilitate the furrow irrigation method. The quantity of water applied would be based on agronomic demand. No offsite discharge of surface runoff would occur. There would also not be any increase in erosion or siltation on- or off-site.

VIII. e) The project has been developed to incorporate precipitation from a 100-year rainfall event. As a result, the application area is designed to withstand the proposed wastewater flows from the processing facility in addition to rainfall. In the event capacity is exceeded, SK Foods will cease operations.

VIII. g - j) The project would not deplete groundwater supplies; place housing or structures within a 100-year flood hazard area; expose people or structures to a flooding risk; or result in inundation by seiche, tsunami, or mudflow. The project site is located in Zone X, according to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map as shown on Figure 2. Zone X designates areas that are outside the 500-year flood zone.

Figure 2. FEMA Flood Zones

IX. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	X	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	X

IX. a, c) The project would not divide an established community or conflict with a habitat conservation plan or natural community conservation plan.

IX. b) The project is an expansion of the SK Foods' wastewater disposal activities. As previously discussed, the project will reuse wastewater for irrigation of various annual crops. As such, the project is consistent with the County General Plan and Zoning Ordinance.

X. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	X

X. a, b) The Project would not involve the loss of a mineral resource.

XI. NOISE. Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	X
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	X
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	X
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	X	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	X

XI. a – d) There would be no substantial permanent noise issues associated with operation of the proposed project. Noise associated with farming equipment used to harvest crops would produce a temporary increase in ambient noise levels. Impacts associated with agricultural operations are less-than-significant due to the lack of sensitive receptors in the vicinity of the project site.

XI. e, f) The project is not within an airport land use plan or in the vicinity of a private airstrip.

XII. POPULATION AND HOUSING.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by processing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	X
b) Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	X

XII. a - c) The project would provide for additional land area for disposal of treated wastewater from the SK Foods facility. The project would not induce population growth, displace existing housing, or displace substantial numbers of people.

XIII. PUBLIC SERVICES.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☐	X
Fire protection?	☐	☐	☐	X
Police protection?	☐	☐	☐	X
Schools?	☐	☐	☐	X
Parks?	☐	☐	☐	X
Other public facilities?	☐	☐	☐	X

XIII. a) The project would not result in the need for new or physically altered governmental facilities. The project does not involve the discharge of waste to community sewers. SK Foods currently discharges the food process line wastewater to the City of Lemoore wastewater treatment plant and uses a City

pipeline to convey bulk process wastewater from the plant to the current land application area. As part of the project, SK Foods will land apply the food process wastewater to the proposed land application site, thereby reducing dependence on City wastewater treatment facilities. In addition, a new pipeline will be installed to convey process water from the plant to the new land application site. The new pipeline will be used instead of the City's pipeline. Therefore, no additional demand on, or impacts to, public utilities or services are expected.

XIV. RECREATION.

	Potentially Significant Impact		Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	X

XIV. a, b) The project would not affect the use of existing recreational facilities, does not include recreational facilities, nor does it require the construction or expansion of recreational facilities.

XV. TRANSPORTATION/TRAFFIC. Would the Project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☐	X
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☐	X
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	X	☐
e) Result in inadequate emergency access?	☐	☐	X	☐

f) Result in inadequate parking capacity?	☐	☐	☐	X
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	X

XV. a - c, f, g) The project would not generate new vehicle trips or change air traffic patterns. The project would also not result in inadequate parking capacity or conflict with adopted policies, plans, or programs supporting alternative transportation.

XV. d, e) The proposed area would be used for agricultural purposes, requiring the use of farm equipment for planting and harvesting various annual crops. The project consists of fields and dirt agricultural roads with limited emergency access. Additional infrastructure for emergency access is not planned as part of the project.

XVI. UTILITIES AND SERVICE SYSTEMS.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	X	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	X	☐
c) Require or result in the construction of new storm water drainage facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	X
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	X
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	X
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	X
g) Comply with federal, state, and local statutes and regulations	☐	☐	☐	X

related to solid waste?

XVI. a) The Regional Water Board will issue revised WDRs for disposal of wastewater on the project site. A monitoring program would be adopted with the revised WDRs requiring the performance of the waste disposal operation to be monitored and to assure that compliance limits will be met. If necessary, corrective action measures can be implemented by SK Foods. No significant impacts are anticipated.

XVI. b) During construction of irrigation and wastewater distribution piping in the project area there is the potential that existing subsurface utilities (gas, electrical, water, sewer, etc.) would be encountered and if appropriate safeguards are not followed, significant health and safety impacts could occur. SK Foods would conduct a utilities search prior to installation of subsurface piping, which would involve identification of utilities within the alignment and appropriate interaction with utility owners to further refine any alignment issues.

No new water or wastewater treatment facilities would be expected or required for the proposed project. Existing pre-treatment facilities will provide adequate treatment prior to discharging the wastewater to the proposed land application sites.

XVI. c – g) The project would have no impact on water, wastewater, storm drainage, or solid waste facilities.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	X	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	X
c) Does the project have environmental effects which will cause substantial adverse effects on human beings,	☐	☐	☐	X

either directly or indirectly?

XVII. a) The project does have the potential to degrade groundwater quality. However, proper management of the wastewater will reduce this impact to less-than-significant levels.

XVII. b, c) The project does not have cumulative impacts, nor would substantial adverse effects occur on human beings.

APPENDIX A

Environmental Checklist Form

APPENDIX B

EDR NEPA Check

APPENDIX C

Parcel List