

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY/CHECKLIST
And
MITIGATED NEGATIVE DECLARATION**

A. PROJECT TITLE:

Adoption of Conditional Waiver of Waste Discharge Requirements and a Monitoring and Reporting Program for Discharges of Wine, Beverage and Food Processing Waste to Land in the North Coast Region.

B. LEAD AGENCY:

California Regional Water Quality Control Board, North Coast Region
5550 Skylane Blvd., Suite A, Santa Rosa, CA 95403

C. CONTACT PERSON:

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D. PROJECT LOCATION:

This project is located in the North Coast region, which comprises all basins from the California-Oregon state line including Lower Klamath Lake and Lost River Basins draining into the Pacific Ocean to the southerly boundary of the watershed of Estero de San Antonio and Stemple Creek in Marin and Sonoma Counties.

E. PROJECT SUMMARY:

The project is the adoption of a general conditional waiver of waste discharge requirements (WDRs) for eligible wine, beverage and food (WBF) processing facilities that discharge process wastewater or process solids to land. Eligible WBF processing facilities may apply for enrollment under the general conditional waiver rather than obtaining an individual conditional waiver of WDRs, enrolling under the general WBF WDR Order, or obtaining individual WDRs.

Eligible types of WBF processing facilities include, but are not limited to: wineries, breweries, cider houses, non-alcoholic beverage producers, distilleries, post-slaughter cut and wrap meat processing facilities, fruit and vegetable processors and dairy product manufacturers. Those eligible types of WBF processing facilities that produce 1,500 gallons per day (gpd) or less of process wastewater, as measured during the peak production period of the facility, and discharge that process wastewater to land may apply for coverage. Additionally, wineries that: produce 3,000 gpd or less of process wastewater as measured during the peak production period; discharge that process wastewater to land; and produce no more than five gallons of wastewater

for each gallon of wine produced annually (5:1 wastewater to wine ratio), may apply for coverage. Eligible WBF processing facilities must comply with the requirements of the conditional waiver of WDRs including land application of process wastewater and process solids at agronomic rates, meeting groundwater limitations, and implementing a monitoring and reporting program (MRP).

F. PROJECT DESCRIPTION:

The project entails the adoption of Order No. R1-2016-0003, *Conditional Waiver of Waste Discharge Requirements for Discharges of Wine, Beverage and Food Processor Waste to Land in the North Coast Region* (WBFP Waiver Order),¹ which conditionally waives WDRs for small discharges of WBF processing solid wastes, and wastewaters to land located with the North Coast.

California Water Code section 13260 subdivision (a) requires that any person discharging waste or proposing to discharge waste, other than to a community sewer system, that could affect the quality of the waters of the State, to file a Report of Waste Discharge (ROWD) with the Regional Water Board to obtain coverage under WDRs or a waiver of WDRs. "Waste" is defined in California Water Code section 13050 subdivision (d).

Discharges to land of process wastewater and process solids originating from a WBF processing facility have the potential to affect the quality of waters of the State. Such discharges have certain common characteristics, such as similar constituents, concentrations of constituents, disposal techniques, flow ranges and they require the same or similar treatment standards.

Pursuant to California Water Code section 13269, waivers of WDRs may be issued as to a specific discharge or type of discharge. Waivers shall not exceed five (5) years in duration. Enrollment in this Order: (a) is conditional; (b) may be terminated at any time; (c) does not permit an illegal activity; (d) does not preclude the need for permits which may be required by other local or governmental agencies; and (e) does not preclude the Regional Water Board from administering enforcement remedies (including civil penalties) pursuant to the California Water Code and other applicable law.

Determinations of whether a WBF processing facility should be covered by this WBFP Waiver Order or is appropriate for coverage under the general WBF WDR Order, facility specific WDRs, or some other WDRs or conditional Waiver will be made on a case-by-case basis by Regional Water Board staff, based on the information provided in the ROWD. In general, discharges from smaller WBF processor operations where the average monthly production of process wastewater is 1,500 gpd or less, as measured during the peak production month, or from a winery where the average monthly production of process wastewater is 3,000 gpd or less and a wastewater to wine ratio of 5:1 is met, will be eligible for coverage under the WBFP Waiver Order.

WBF processor waste authorized for discharge by the WBFP Waiver Order includes fruit and vegetable matter, pomace, lees, soil, rinse water, wash water, cooling water, and water softener waste. The waste produced by agricultural operations associated with the growing of the fruits

¹ The tentative Conditional Waiver of Waste Discharge Requirements for Discharge of Wine, Beverage and Food Processor Waste to Land in the North Coast Region will be made available at http://www.waterboards.ca.gov/northcoast/water_issues/programs/wine_beverage_food/, on October 23, 2015.

or vegetables is not covered by the WBFP Waiver Order.

WBF processing waste can have elevated levels of organic matter, solids, nutrients, and salts with swings in pH requiring physical, biological, and/or chemical treatment. Whether an individual discharge of WBF processing waste may affect the quality of waters of the State depends on the quantity of waste, the quality of waste, extent of treatment, soil characteristics, distance to surface waters, depth to groundwater, and other factors.

An owner or operator of a WBF processing facility seeking authorization to discharge under this Order shall submit a complete Form 200 and Technical Information Form (TIF), which will include the appropriate documentation of CEQA compliance. The information required with the Form 200 and TIF is equivalent to a ROWD. Only smaller volume WBF processing discharges are eligible for coverage under the WBFP Waiver Order.

The WBFP Waiver Order is expected to improve water quality in the areas where discharges of small volumes of WBF processing waste are currently taking place by identifying such discharges, gathering information on the existing treatment and disposal methods, requiring compliance with conditions of the WBFP Waiver Order, and requiring annual monitoring and reporting. Additionally, the WBFP Waiver Order will allow for a more stream-lined permitting process for these smaller discharges of WBF processing waste to land.

Historically, discharges of processing waste to land by small WBF processing facilities located in the north coast region have not been regulated by the Regional Water Board. Since 2002, over fifty small wineries have applied for coverage under Order No. R1-2002-0012, *General Waste Discharge Requirements for Discharges of Winery Waste to Land* (Winery WDR Order) and were deferred enrollment by Regional Water Board staff. Deferral of enrollment was based on the winery being a small winery, producing less than 1,500 gallons per day of process wastewater, and the discharge posing a minimal risk to groundwater quality. These smaller wineries were advised of the deferral of coverage under the Winery WDR Order and told of the future development of a general conditional Waiver of WDRs which would authorize discharges from their facility. The WBFP Waiver Order, once adopted by the Regional Water Board, may be utilized as the conditional Waiver of WDRs for these smaller WBF processing facilities.

G. SURROUNDING LAND USES AND SETTING:

The project is located within the North Coast Region, which comprises all basins from the California-Oregon state line including Lower Klamath Lake and Lost River Basins draining into the Pacific Ocean to the southerly boundary of the watershed of the Estero de San Antonio and Stemple Creek in Marin and Sonoma Counties. The North Coast Region encompasses a total area of approximately 19,390 square miles, including 340 miles of scenic coastline and remote wilderness areas, as well as urbanized and agricultural areas, and includes all of Del Norte, Humboldt, Trinity, and Mendocino counties, major portions of Siskiyou and Sonoma counties, and small portions of Glenn, Lake, Modoc, and Marin counties.

The North Coast Region is characterized by distinct temperature zones. Along the coast, the climate is moderate and foggy and the temperature variation is not great. For example, at Eureka, the seasonal variation in temperature has not exceeded 63°F for the period of record. Inland, however, seasonal temperature ranges in excess of 100°F have been recorded. Precipitation over the North Coast Region is greater than for any other part of California, and

damaging floods are a fairly frequent hazard. Particularly devastating floods occurred in the North Coast area in December of 1955, in December of 1964, and in February of 1986.

Ample precipitation in combination with the mild climate found over most of the North Coast Region has provided a wealth of fish, wildlife, and scenic resources. The mountainous nature of the Region, with its dense coniferous forests interspersed with grassy or chaparral covered slopes, provides shelter and food for deer, elk, bear, mountain lion, furbearers and many upland bird and mammal species. The numerous streams and rivers of the Region contain anadromous fish, and the reservoirs, although few in number, support both coldwater and warmwater fish. Tidelands, and marshes too, are extremely important to many species of waterfowl and shore birds, both for feeding and nesting. Cultivated land and pasture lands also provide supplemental food for many birds, including small pheasant populations. Tideland areas along the north coast provide important habitat for marine invertebrates and nursery areas for forage fish, game fish, and crustaceans. Offshore coastal rocks are used by many species of seabirds as nesting areas.

Major components of the economy are tourism and recreation, logging and timber milling, aggregate mining, commercial and sport fisheries, sheep, beef and dairy production, vineyards and wineries.

H. BASELINE CONDITIONS:

This environmental analysis considered potential environmental impacts of adoption of the WBFP Waiver Order. Specifically, it considers actions that may be taken to comply with the WBFP Waiver Order, beyond those actions currently being implemented through volunteer actions or under existing regulations.

The baseline conditions for purposes of this environmental analysis include:

- Discharges from WBF processing facilities that currently discharge process wastewater or process solids to land.
- Existing physical conditions at WBF processing facilities that currently discharge process wastewater or solids to land.

I. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The North Coast Regional Water Quality Control Board has prepared this Initial Study to evaluate reasonably foreseeable environmental impacts associated with adopting the proposed WBFP Waiver Order. The WBFP Waiver Order could be used to regulate smaller WBF processing facilities throughout the North Coast Region, and thus the evaluation of the environmental factors does not address a specific site.

Discharges of wastewater from WBF processors poses a risk to water quality; the conditions of the proposed WBFP Waiver Order are designed to ensure that these discharges will be mitigated to less than significant levels. However, environmental review may need to be performed by local agencies that issue land use approvals for new or expanding WBF processing facilities. Impacts associated with those land use determinations fall outside the purview of this analysis. Discharges that do not qualify for coverage, such as discharges from WBF processing facilities producing greater than 1,500 gpd of wastewater or wineries producing greater than 3,000 gpd of

CEQA: Initial Study and Environmental Checklist

wastewater and meeting a wastewater to wine ratio of 5:1 are prohibited from enrollment under the proposed WBFP Waiver Order and similarly fall outside the purview of this analysis. If a particular proposed discharge does not meet the criteria of the proposed WBFP Waiver Order, the North Coast Regional Water Board may prepare an individual waiver or WDRs, as appropriate, and this would be accompanied by separate CEQA findings.

The environmental factors checked below would be potentially affected by this project. Please see the following checklist for additional information.

- | | |
|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Land Use/Planning |
| <input checked="" type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Population/Housing |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Geology/Soils | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

J. DETERMINATION:

On the basis of this initial evaluation;

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed project COULD have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared By:

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Land Disposal and Groundwater Permitting Unit

Date: October 20, 2015

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
ENVIRONMENTAL CHECKLIST**

SECTION 1. AESTHETICS. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Aesthetics a): Less than Significant Impact

Discussion: The adoption of the WBF Waiver Order would not change existing zoning or land use policy pertaining to scenic vistas and the limiting of potential impacts due to development or land use. An existing, new or expanding WBF processor facility that is enrolled under the WBF Waiver Order may be located or constructed in a variety of settings in the North Coast Region. Typically WBF processing facilities will be located in areas of existing agriculture or industrial development. These privately owned and operated process wastewater treatment and disposal systems will be located in close proximity to the processing facility it is serving. Depending on the type of wastewater system, the components of that system, the footprint, and construction activities, the potential for visual impact will vary greatly.

Subsurface wastewater treatment and disposal systems, including sump tanks, septic tanks, and disposal fields, are located underground. Any associated aboveground components such as boxes enclosing pump controls, or valves typically have a low profile. The subsurface disposal fields receiving the wastewater are covered with shallow rooted vegetation that would not obstruct

views. Subsurface treatment and disposal systems are unlikely to impact a scenic vista.

Aboveground treatment and disposal systems may include aerobic or anaerobic treatment units, activated sludge package systems, wetlands, overland flow, spreading basins and pond systems. Treatment units and package plants are constructed in close proximity to the processing facility, and their relatively small size allows them to be concealed within buildings, or behind fencing or vegetation and are unlikely to impact a scenic vista.

Wetlands, overland flow, spreading basins and pond systems require the largest footprint of aboveground systems and are generally constructed in agricultural zoned areas at or slightly above ground level. Vegetation associated with these systems is maintained so as to allow the system to function properly, which may include mowing, and thinning excessive vegetation and removal of dead or diseased vegetation. Such systems will likely blend in with the other agricultural infrastructure, such as irrigation ponds and are unlikely to impact a scenic vista, and are therefore less than significant.

Existing wastewater treatment systems serving WBF processing facilities seeking coverage under the WBFP Waiver Order would be considered part of the existing baseline conditions. A project specific CEQA evaluation will be required for new construction and expansion of a WBF processing facility and the process wastewater treatment system serving that facility. The issue of scenic vistas will be evaluated on a site-specific basis. Siting criteria of the local authority will continue to establish appropriate locations for new structures or modifications to existing structures on a site-specific basis. Many local agencies have ordinances in place establishing standards for construction within scenic areas. The WBFP Waiver Order will not affect those requirements. As site-specific issues are identified, site-specific mitigation would be developed if needed.

Aesthetics b): Less than Significant Impact

Discussion: See response to section Aesthetics a) above. Although a small WBF processing facility and the associated wastewater treatment system covered by the WBFP Waiver Order could be located or constructed within the view shed of scenic highways, above ground portions of these wastewater treatment systems would be relatively low-profile and impacts to scenic highways would be less than significant. The nature of these wastewater systems would also preclude construction in or on historic buildings and rock outcroppings.

Aesthetics c): Less than Significant Impact

Discussion: See response to section Aesthetics a) above.

Aesthetics d): Less than Significant Impact

Discussion: Permanent sources of external lighting may be associated with wastewater systems serving small WBF processing facilities enrolled under the WBFP Waiver Order. Lighting associated with existing wastewater treatment systems would be considered part of the existing baseline conditions. Adoption of the WBFP Waiver Order will not directly require new sources of light or glare. However, it is possible that WBF processing facilities may add external lighting to better manage the wastewater system. The possible increase in lighting resulting from adoption of this WBFP Waiver Order would likely be limited to specific areas of the facility and that

increase from baseline conditions would not have a significant impact on day or night time views, considering that most WBF processing facilities already have some external lighting associated with their operation. The additional external lighting that may be added to better manage an existing wastewater treatment system should not result in a substantial new source of light or glare, and are therefore less than significant. Additionally, the construction and installation of a new lighting system would likely require the issuance of an electrical and/or building permit issued by the local land use authority at which time possible visual impacts not complying with local land use light pollution ordinances and/or regulations would be evaluated.

The local authority will continue to establish design standards and lighting requirements for new construction and expansion of WBF processing facilities. This issue would be addressed during the site-specific evaluation of individual projects by the local authority.

SECTION 2. AGRICULTURAL AND FOREST RESOURCES.

In determining whether impacts to agricultural resources are significant environmental impacts, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping & Monitoring Program of the California Resources Agency, to non-agricultural uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

c) Conflict with existing zoning for, or cause rezoning of, forest land [as defined in PRC section 12220(g)] or timberland (as defined by PRC section 4526)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Agricultural and Forest Resources b) and c): No Impact

Discussion: The adoption of the WBF Waiver Order would not change zoning or land use designations. The WBF Waiver Order does not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned for timber production.

Agricultural and Forest Resources a), d) and e): Less than Significant Impact

Discussion: The adoption of the WBF Waiver Order would not directly result in the conversion of agricultural lands or forest lands. The Regional Water Board does not have any evidence to conclude that any of the waste treatment and disposal practices regulated under the WBF Waiver Order would require the conversion of farmland or forest land to other uses, or that different entitlements would be required by local land use authorities. Therefore the project is likely to have a less than significant impact on agricultural and forest resources.

Any existing wastewater treatment system serving a WBF processing facility seeking coverage under the WBF Waiver Order would be considered part of the existing baseline conditions being evaluated. The issue of farmland and forest land conversion for existing facilities would have been evaluated on a site-specific basis by the local land use authority when these WBF processing facilities were originally proposed.

The issue of farmland and forest land conversion for the construction of new or expanding WBF processing facilities will be evaluated on a site-specific basis by the local land use authority as these projects are identified. The WBF WDR Order does not change zoning or land use designation, and will not alter the economics of farmland or forest land conversion to other uses. Prior to conversion of farmland or forest lands to other uses, entitlements would be required by local land use authorities, and a project specific CEQA evaluation would be performed.

SECTION 3. AIR QUALITY.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Air Quality a), b) c) and d): Less than Significant Impact

Discussion: The adoption of the WBF Waiver Order would not directly result in a conflict with an applicable air plan; violate an air quality standard; result in a cumulatively considerable net increase of a criteria pollutant or expose a sensitive receptor to a substantial pollutant concentration.

The potential for a process wastewater treatment and disposal system covered by the WBF Waiver Order to conflict or be in violation of an air quality plan is low. The majority of equipment at a WBF processing facility that is used for wastewater treatment and disposal is powered by electricity. An emergency internal combustion engine generator may be used as a backup power

source for the continued operation of a WBF processor wastewater treatment and disposal system during times of power outages. Emergency generators powered by stationary internal combustion engines that exceed a horsepower rating (typically 50 HP) must be permitted by local air quality management districts. The use of emergency equipment is generally limited to short-term periods, and is therefore likely to have a less than significant impact on air quality.

Any existing impact from a currently operating wastewater treatment system serving a WBF processing facility seeking coverage under the WBFP Waiver Order would be considered part of the existing baseline conditions being evaluated. Any changes to an existing WBF processor wastewater system resulting from the Order, such as possible repairs or improvements, should not cause a significant increase in power usage from existing baseline conditions. Any additional air quality impacts caused by a repaired or upgraded systems would be negligible. Additionally, the repair and upgrade activities would likely require the issuance of an electrical and/or building permit issued by the local land use authority at which time possible air quality impacts not complying with air quality plans or local land use ordinances and regulations would be evaluated.

For new and expanding facilities, the overall air quality impacts caused by the uses for which the systems would serve would be analyzed by the local land use authority permitting agency in a project specific analysis. As specific systems are identified, site-specific environmental review will be conducted which will consider any additional air quality impacts not addressed in this document.

Emissions generating equipment, such as heavy equipment powered by fossil fuels could be employed by a WBF processing regulated under the WBFP Waiver Order, for the purpose of operating or repairing the wastewater treatment system or land applying process waste. Where such equipment could create impacts to air quality, permits would be required or operating requirements would be imposed by one of the regulatory programs summarized below.

The air quality regulatory framework is complex and varies at the federal, state, and local levels. Multiple federal and state laws provide the California Air Resources Board and local air districts with authority to protect public health by regulating air contaminants with potential to cause adverse health effects:

- California Clean Air Act Requirements - The California Health and Safety Code (H&SC) section 39607(e) requires the California Air Resources Control Board (CARB) to establish and periodically review and designate areas of California as attainment, nonattainment, or unclassified for State standards. The CARB makes area designations for ten pollutants: ozone, suspended particulate matter (PM10 and PM2.5), carbon monoxide, nitrogen dioxide, sulfur dioxide, sulfates, lead, hydrogen sulfide, and visibility reducing particles.
- Federal Clean Air Act Requirements - Like the CARB, US EPA designates areas for each pollutant for which there is a national ambient air quality standard: Ozone 8-Hour Standard, PM10, PM2.5, Carbon Monoxide, Nitrogen Dioxide, and Sulfur Dioxide.
- Local Air Quality Management/Air Pollution Control - The State of California is divided into Air Pollution Control Districts (APCD) and Air Quality Management Districts (AQMD); referred to

herein as air districts. Air districts are county or regional governing authorities that have primary responsibility for controlling air pollution from stationary sources.

WBF processing facilities enrolled under the WBFP Waiver Order will continue to be regulated by the above cited regulatory authorities.

Air Quality e): Less than Significant Impact with Mitigation Incorporated

Discussion: The adoption of the WBFP Waiver Order would not directly create objectionable odors affecting a substantial number of people. However the management of process wastewater and/or residual solids from small WBF processing facilities that are enrolled and regulated under the WBFP Waiver Order could create objectionable odors. WBF processing wastes are typically high in biodegradable organic matter and enough water is typically present to foster aerobic decay (when sufficient oxygen is present) and anaerobic decay (when atmospheric oxygen cannot diffuse into the waste). Though both aerobic and anaerobic decay create odors, most people find the odor associated with anaerobic decay to be more offensive.

The use of common best management practices developed and implemented by the WBF processing industry have been shown to effectively prevent the creation of nuisance odors in the majority of cases. The underlying principles are to prevent anaerobic conditions, prevent standing water in the land application areas, and distributing land applied waste over a large area to maximize contact with atmospheric oxygen. The WBFP Waiver Order includes the following prohibitions and discharge specifications to mitigate the potential for nuisance odor conditions to occur to a less-than-significant level:

- The WBFP Waiver Order requires a 1.0 mg/l dissolved oxygen concentration in pond systems at any time.
- The WBFP Waiver Order prohibits the land application of process wastewater or processing solids during times of soil saturation.
- The WBFP Waive Order prohibits the creation of pollution, contamination, or nuisance as defined by section 13050 of the California Water Code (CWC).

Any existing odor impact from a currently operating wastewater treatment system serving a WBF processing facility seeking coverage under the WBFP Waiver Order would be considered part of the existing baseline conditions being evaluated. The new construction and expansion of WBF processing facilities is subject to local agency approvals, permits, and possibly a project-level CEQA review, at which time potential adverse impacts must be evaluated and appropriate mitigation measures implemented for both construction and operations-related air quality impacts. WBF processing facility pollutant sources will be regulated by the local air district to ensure compliance with air quality standards.

SECTION 4. BIOLOGICAL RESOURCES. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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 Wildlife (DFW) or United States Fish and Wildlife Service (USFWS)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 DFW or USFWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, <i>etc.</i>) through direct removal, filling, hydrological interruption or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Biological Resources a), b), c), d), e) and f): Less than Significant Impact.

Discussion: The adoption of the WBFP Waiver Order would not directly result in potential impacts to biological resources. The adoption of the WBFP Waiver Order allows an eligible WBF processing facility discharging process waste to land to apply for coverage under the general WBFP Waiver Order rather than obtaining an individual facility specific Waiver of WDRs. A WBF processing facility seeking coverage under the WBFP Waiver Order may be located in a variety of settings, including sensitive habitat areas. Depending on the nature of the WBF processing facility, footprint, and operational activities, the potential for biological resource impacts will vary. Any existing impacts to biological resources from currently operating wastewater treatment system serving a WBF processing facility seeking coverage under the WBFP Waiver Order would be considered part of the existing baseline conditions being evaluated.

Changes to an existing WBF processor wastewater treatment and disposal system resulting from enrollment under the WBFP Waiver Order, such as repairs or upgrades to the wastewater system should not cause a significant increase in impacts to biological resources from existing baseline conditions. WBF processor wastewater treatment and disposal systems will be located on lands currently used for industrial or agricultural purposes and therefore are not in the sensitive natural habitat or habitat of wildlife species. Any impact would therefore be less than significant.

Small WBF processing facilities regulated by the WBFP WDR Order are limited to discharging process wastewater to land and discharging process solids to agricultural lands as a soil amendment. Discharges of WBF processing waste to surface waters are prohibited by the WBFP Waiver Order. Federally protected wetlands and streams are considered surface waters and as such are prohibited from being discharged to by the WBFP Waiver Order.

The construction of new or expanding WBF processing facilities regulated by the WBFP Waiver Order could result in potential impacts to biological resources. The approval and construction of new or expanding WBF processing facilities will be evaluated by the local land use authority and will include a project specific CEQA analysis. The analysis will identify any site-specific biological resources that may be impacted by the proposed construction project. Construction and expansion of new WBF processing facilities regulated by the WBFP Waiver Order are subject to local agency approvals and permits. The WBFP Waiver Order does not address, preempt, or supersede the authority of local policies or ordinances in protecting biological resources. Therefore, conflicts with such plans, policies or ordinances are unlikely to occur.

SECTION 5. CULTURAL RESOURCES. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Calif. Code Regs. title 14 section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in Calif. Code Regs. title 14 section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Cultural Resources a), b), c) and d): Less than significant Impact

Discussion: WBF processing facilities may be located in a variety of settings, including sites that have historical resources, archeological resources, or tribal cultural resources. Depending on the nature of the WBF processing facility, footprint, and operational activities, the potential for impacts will vary. It is unlikely that the majority of management measures and activities at existing WBF processing facilities that pertain to the disposal of process wastewater or process solids on land would result in changes to baseline conditions that would cause a substantial adverse change in the significance of a historical or archaeological resource pursuant to section 15064.5, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, disturb any human remains, including those interred outside of formal cemeteries, or cause a substantial adverse change in tribal cultural resources. However, where repairs or maintenance of onsite wastewater treatment system components or the application of process solids to cropped agricultural lands is necessary to attain or maintain compliance with the WBF Waiver Order, soil excavation or disturbance may, at times, take place. If possible, the location of the excavation or soil disturbance shall be chosen as to avoid the disturbance of

known archeological, historical, or tribal cultural resources while still complying with the requirements of order. Most of the work is anticipated to occur in areas already disrupted and the likelihood of encountering historical, archaeological, human remains, tribal cultural resources and paleontological resources is low. In the event that excavation activities take place in previously undisturbed areas, a cultural resources investigation shall be required prior to any substantial disturbance. The cultural resources investigation will include, at a minimum, a records search for previously identified cultural resources and previously conducted cultural resources investigations of the project parcel and vicinity. This record search should include, at a minimum, contacting the appropriate information center, such as the information centers of the California Historical Resources Information System. In coordination with the information center or a qualified archaeologist, or in coordination with tribes culturally affiliated with the geographic area of the site, a determination regarding whether previously identified cultural resources will be affected by the proposed activity must be made and if previously conducted investigations were performed. The purpose of this investigation would be to identify resources before they are affected and avoid or mitigate any significant impact.

Upon discovery of human remains, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains (Health & Safety Code, section 7050.5; Public Resource Code, section 5097.9 et seq).

In addition, the expansion of existing WBF processing facilities and construction of new WBF processing facilities that are regulated under the proposed WBF Waiver Order could result in site disturbance that might, in some circumstances, disturb or cause changes to cultural resources. New or expanding WBF processing facilities are subject to local agency approvals, permits, and possibly a project-level CEQA review, at which time potential adverse impacts must be evaluated and appropriate mitigation measures implemented in accordance with local, state, and federal requirements as follows:

- A cultural resources investigation should be conducted before any substantial disturbance. The cultural resources investigation will include, at a minimum, a records search for previously identified cultural resources, including sites, features, places, cultural landscapes, sacred places, and objects with cultural value pursuant to the California Register of Historical Resources or included in a local register of historical resources.
- The lead agency will consider the impact of the project on tribal cultural resources and follow consultation requirements pursuant to Public Resources Code sections 21080.3.1, 21080.3.2, and 21082.3.
- Upon discovery of human remains during construction of expanded or new WBF processing facilities that would be regulated under the Order, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains. (Health & Safety Code, Section 7050.5; Public Resource Code, Section 5097.9 et seq).

SECTION 6. GEOLOGY and SOILS. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated in 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 & Geology Special Publication No. 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternate wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Geology and Soils a), i), ii), iii) and iv): Less than significant Impact

Discussion: The adoption of the WBFP Waiver Order would not directly result in exposure of people or structures to potential adverse effects involving: rupture of a known fault; landslides; or strong seismic ground shaking or ground failure. There is wide variation in the north coast region for risk related to faulting, ground shaking, seismically related ground failure, and liquefaction. Existing wastewater treatment systems serving WBF processing facilities seeking coverage under the WBFP Waiver Order would be considered part of the existing baseline conditions. Expansion or new construction of WBF processing facilities and their associated process wastewater treatment and disposal system will be subject to local land use permits and an associated project-level CEQA review, at which time potential adverse geologic related impacts must be evaluated and appropriate mitigation measures implemented. At a minimum these projects would be subject to local building codes developed to reduce the risk of loss, injury, or death to a less than significant level.

Geology and Soils b): Less than significant Impact with Mitigation Incorporated

Discussion: The discharge of treated wastewater aboveground to land has the potential to result in soil erosion and loss of topsoil. Aboveground discharges from existing wastewater treatment systems serving WBF processing facilities seeking coverage under the WBFP Waiver Order would be considered part of the existing baseline conditions. Additionally, the WBFP Waiver Order incorporates the following conditions of discharge that will prevent erosion and loss of topsoil within areas used for the land application of waste:

- Treated WBF process wastewater or processing solids shall not be applied to the land application area during times of soil saturation.
- The Discharger shall visually observe (inspect) the land application area to confirm the non-saturation status of soils.
- Treated WBF processing wastewater or processing solids shall not be applied within 25 feet of surface water or a surface water drainage course unless the land application area is graded or bermed to prevent runoff into the surface water or drainage course.
- Discharge of wastes to surface waters or surface water drainage courses is prohibited.

The construction of expanding or new small WBF processing facilities may involve excavation, grading, and/or surface soil disturbance. Local governments typically have established protocols for construction projects to minimize soil erosion and sedimentation, and minimize storm water runoff. Such projects are subject to local agency approvals, permits, and possibly a project-level CEQA review, at which time potential adverse impacts must be evaluated and appropriate mitigation measures implemented.

Geology and Soils c) and d): Less than significant Impact

Discussion: Adoption of the WBFP Waiver Order would not directly cause impacts associated with soil instability, or expansive soils. Existing wastewater treatment systems serving WBF processing facilities seeking coverage under the WBFP Waiver Order would be considered part of the existing baseline conditions. The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time potential impacts of soil instability or presence of expansive soils will be evaluated and appropriate mitigation measures implemented.

Geology and Soils e): Less than significant Impact with Mitigation Incorporated

Discussion: Adoption of the WBF Waiver Order will not directly cause a discharge of wastewater to soils incapable of adequately supporting the use of septic tanks or alternate wastewater disposal systems, however there is the potential for a small WBF processing facility seeking enrollment under the WBF Waiver Order, to utilize a septic tank or alternate wastewater disposal system and to discharge to inadequate soils.

Existing wastewater treatment systems serving WBF processing facilities seeking coverage under the WBF Waiver Order would be considered part of the existing baseline conditions.

Additionally, any WBF processing facility seeking enrollment under the WBF WDR Order is required to submit a Form 200 and Technical Information Form (TIF) to the Regional Water Board for review and evaluation of eligibility for enrollment under the WBF Waiver Order. The TIF requires information on the design, location and operation and maintenance of the disposal system. Those small WBF processing facilities utilizing septic tank subsurface disposal fields or spreading basins are required to meet a minimum separation to groundwater and be designed for the unique characteristics of the process wastewater. Design includes evaluation of proposed disposal area soils for adequate treatment and disposal capacity. Confirmation of the soil's ability to adequately support the disposal system will be included with the wastewater systems design and site evaluation plans, which will be included with the TIF. Small WBF processing facilities that apply for enrollment under the WBF Waiver Order and document through the submittal of the TIF the existence of a soil type that Regional Water Board staff has found to be inadequate for type or volume of waste being disposed, will not be eligible for enrollment under the WBF Waiver Order.

The construction of expanding or new WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential to directly cause a discharge of wastewater to soils incapable of adequately supporting the use of septic tanks or alternate wastewater disposal systems will be evaluated and appropriate mitigation measures implemented.

SECTION 7. GREENHOUSE GAS EMISSIONS. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Greenhouse Gas Emission a): Less Than Significant Impact

Discussion: The adoption of the WBF Waiver Order itself would result in less than significant generation of greenhouse gas emissions, or in effects associated with adaptation to global climate change. Global climate change is a change in the average weather of the earth, which can be measured by wind patterns, storms, precipitation, and temperature. It is exacerbated by greenhouse gases, which trap heat in the atmosphere (thus the “greenhouse” effect). Greenhouse gases include carbon dioxide, methane, and nitrous oxide, and are emitted by natural processes and human activities. Greenhouse gas accumulates in the atmosphere and regulates Earth’s temperature, and is natural and desirable as without it Earth’s surface would be significantly cooler, and generally uninhabitable by current standards. The effects of Global Climate change at levels exceeding natural and desirable levels includes increased drought and associated increase in wildfires, increased flooding events, and increased vector-borne disease.

The discharge of organic waste by a WBF processing facility enrolled and regulated under the WBF Waiver Order may result in generation of some greenhouse gas (GHG) emissions as organic matter degrades in the soil of the land application area. The primary gasses of concern produced are carbon dioxide (CO2) and methane (CH4). The amount of these gases produced will vary depending on land application operation and maintenance practices related to the discharge of wastewater and residual solids. However, this amount is expected to be less than significant from current baseline conditions and applications. Furthermore, based on the WBF Waiver Orders restrictions on the volume of discharges of process solid wastes to land at agronomic rates, the discharges will contribute a small amount of GHGs when considered both individually and cumulatively, and the impact is generally less than significant. Additionally, emissions from existing WBF processing facilities associated with the treatment, disposal or land application of process wastewater and process solids would be considered part of the existing baseline conditions.

Construction activities associated with operating or improving an existing WBF processor wastewater system is not expected to obstruct an applicable air quality plan, or result in a significant increase in greenhouse gasses. Construction of this type generally requires very few construction vehicles and would be temporary, likely short in duration, and thus resulting in a less than significant increase in greenhouse gas emissions.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential to directly result in the generation of greenhouse gas emissions, or in effects associated with adaptation to global climate change directly will be evaluated and appropriate mitigation measures implemented.

Greenhouse Gas Emission b): Less Than Significant Impact

Discussion: The adoption of the WBF Waiver Order itself would not directly result in a conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing

the emissions of greenhouse gases. The discharge of organic waste by a small WBF processing facility enrolled and regulated under the WBFP Waiver Order may result in generation of some small amount of greenhouse gas (GHG) emissions as organic matter degrades in the soil of the land application area. The primary gasses of concern produced are carbon dioxide (CO₂) and methane (CH₄). The amount of these gases produced will vary depending on land application operation and maintenance practices related to the discharge of wastewater and residual solids. However, it is expected that this will have a less than significant impact. Other sources of air emissions, such as transportation, industrial activities, and power generation, are the major contributors to significant cumulative air quality impacts. The slight increase in greenhouse gas emissions are not in conflict with plans, policies, or regulations adopted for the purpose of reducing emission of greenhouse gases, such as AB 32 and Executive Order No. S-3-05, and would have a less than significant impact.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential to directly conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases will be evaluated and appropriate mitigation measures implemented.

SECTION 8. HAZARDS and HAZARDOUS MATERIALS. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

CEQA: Initial Study and Environmental Checklist

d) 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 a public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 a public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Hazards and Hazardous Materials a), b), c), d), e), f), g), and h): No Impact

Discussion: The adoption of the WBFP Waiver Order would not directly result in potential impacts associated with hazards and hazardous materials. Although some of the small WBF processing facilities enrolled and regulated under the WBFP Waiver Order may store and use some hazardous materials, the WBFP Waiver Order would not regulate the storage or use of these materials, nor would it authorize on-site disposal of them. Small WBF processors enrolled under the WBFP Waiver Order are authorized to discharge non-hazardous process wastewater and processing solid waste to land. Discharges of hazardous waste are not authorized by the WBFP Waiver Order and are specifically prohibited from being discharged to the wastewater treatment and disposal system.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential direct hazard and hazardous material impact of the project will be evaluated and appropriate mitigation measures implemented.

SECTION 9. HYDROLOGY and WATER QUALITY. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 (<i>e.g.</i> , 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

h) Place housing within a 100-year flood hazard area structures which would impede or redirect flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Hydrology and Water Quality a) and f): Less than Significant Impact

Discussion: Adoption of the WBFP Waiver Order will not violate any water quality standards or waste discharge requirements. The WBFP Waiver Order will be implemented by the North Coast Regional Water Quality Control Board and in compliance with the Water Quality Control Plan for the North Coast Region (Basin Plan). The WBFP Waiver Order was crafted to implement the Basin Plan and in so doing took into consideration the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other (including previous) waste discharges, the need to prevent nuisance, and the provisions of Water Code section 13241.

Small WBF processing facilities seeking enrollment under the WBFP Waiver Order are required to design an appropriate method of wastewater treatment based on site-specific conditions. All WBF processing facilities enrolled under the WBFP Waiver Order are required to meet groundwater limitations, which are based on the Basin Plan’s water quality objective for groundwater. The WBFP Waiver Order includes a Monitoring and Reporting Program (MRP) which should identify any violation of the WBFP Waiver Order, or accidental discharges that may occur if the treatment systems did not function properly.

Owners or operators of small WBF processing facilities enrolled under the WBFP Waiver Order that fail to meet water quality standards or waste discharge requirements will be subject to enforcement by the Regional Water Board. Additionally the Regional Water Board may revoke any enrollment deemed inappropriate and issue a site-specific, individual Waiver or WDRs Order.

Hydrology and Water Quality b): Less than Significant Impact

Discussion: Adoption of the WBFP Waiver Order will not have a direct depleting impact on groundwater supplies or interfere with recharge. Small WBF processing facilities enrolled under the WBFP Waiver Order would be discharging process wastewater to land, which may result in an increase rather than a depletion of groundwater supplies. Additionally, the reuse of process wastewater as irrigation water for landscaped areas or crops or frost protection will replace water that was otherwise used for that purpose, including groundwater.

In cases where the source water for a small WBF processing facility will be groundwater; the pumping of groundwater has the potential to affect the groundwater supply. However, the WBFP Waiver Order does not change local zoning or land use designation, and would not alter the economics of converting land to WBF processing uses. Existing small WBF processing facilities that expand or new facilities that are constructed after adoption of the proposed WBFP Waiver Order, and seek enrollment under the WBFP Waiver Order, are subject to local agency approvals,

permits, and possibly a project-level CEQA review, at which time potential adverse impacts must be evaluated and appropriate mitigation measures implemented.

Hydrology and Water Quality c), d) and e): Less than Significant Impact

Discussion: Adoption of the WBFP Waiver Order will not have a direct impact on the alteration of existing drainage patterns or create or contribute runoff water exceeding a drainage systems capacity. Small WBF processing facilities enrolled under the WBFP Waiver Order are prohibited from discharging process wastes to surface waters or drainage courses.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential direct impact of the WBF processing facility project on the alteration of existing drainage patterns or the creation or contribution of runoff water exceeding a specific drainage systems capacity will be evaluated and appropriate mitigation measures implemented.

Hydrology and Water Quality g): No Impact

Discussion: The adoption of the WBFP Waiver Order does not entail construction of new housing. The WBFP Waiver Order does not address or modify local zoning, which determines acceptable housing locations; therefore, the WBFP Waiver Order would not result in housing or other structures being placed within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary Map, Flood Insurance Rate Map, or other flood hazard delineation map.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential direct impact of the WBF processing facility project and the placement of housing within a 100-year flood hazard area will be evaluated and appropriate mitigation measures implemented.

Hydrology and Water Quality h): Less than Significant Impact

Discussion: The WBFP Waiver Order authorizes discharges of WBF processing waste to land by eligible WBF facilities, it does not address the construction of new small WBF processing facilities or other major structures. The WBFP Waiver Order does not address or modify local zoning, which determines acceptable locations for new small WBF processing facilities; therefore, the WBFP Waiver Order would not result in WBF processing facilities or other structures being placed within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary Map, Flood Insurance Rate Map, or other flood hazard delineation map.

Hydrology and Water Quality i): Less than Significant Impact

Discussion: Adoption of the WBFP Waiver Order is not expected to expose people or structures to a significant risk involving flooding. Some small WBF processing wastewater systems will use wastewater ponds either as treatment or storage facilities. In most cases, the ponds will be small and outside the jurisdictional size limits of the California Department of Water Resources (DWR) Division of Safety of Dams. Wastewater ponds that are subject to DWR Division of Safety of Dams statutes and regulations will be approved and inspected by DWR engineers and geologist.

CEQA: Initial Study and Environmental Checklist

A project specific CEQA evaluation will be performed for new or expanding small WBF processor wastewater systems seeking coverage under the WBFP Waiver Order; the issue of flood hazard will be evaluated on a site-specific basis at that time. Any new or expanding small WBF processing facility constructed after adoption of the proposed WBFP Waiver Order is subject to local agency approvals, permits, and possibly a project-level CEQA review, at which time potential adverse impacts such as exposure of people or property to water related hazards including flooding must be evaluated and appropriate mitigation measures implemented.

Hydrology and Water Quality j): Less than Significant Impact

Discussion: The WBFP Waiver Order does not address local zoning, which determines acceptable facility locations; therefore, the WBFP Waiver Order would not result in WBF processing facilities being placed within a location subject to inundation by seiche, tsunami, or mudflow. A project specific CEQA evaluation will be performed for new or expanding small WBF processing facilities seeking coverage under the General Order; the issue of inundation by seiche, tsunami, or mudflow will be evaluated on a site-specific basis at that time.

SECTION 10. LAND USE AND PLANNING. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Land Use and Planning a), b) and c): No Impact

Discussion: The adoption of the WBFP Waiver Order itself would not cause potential land use impacts by dividing a community, or conflicting with a land use plan, land use policy, habitat

conservation plan or natural community conservation plan. Small WBF processing facilities whose discharges of waste would be regulated under the WBFP Waiver Order need to comply with applicable land use plans, policies, and regulations by local agencies, including habitat conservation areas or natural community conservation plan areas.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential direct impact of the WBF processing facility project on land use will be evaluated and appropriate mitigation measures implemented.

SECTION 11. MINERAL RESOURCES. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Mineral Resources a) and b): No Impact

Discussion: The adoption of the proposed WBFP Waiver Order would have no direct effects on mineral resources. WBF processor waste discharge activities authorized by the WBFP Waiver Order will not result in loss of availability of a known mineral resource that would be of future value to the region and the residents of the state, or 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. A significant adverse effect on mineral resources due to the on-site disposal of process wastewater and process solids is unlikely.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential direct impact of the WBF processing facility project on mineral resources will be evaluated and appropriate mitigation measures implemented.

SECTION 12. NOISE. Would the project result in:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 in or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing in or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Noise a) b), c), d) e) and f): Less than Significant Impact

Discussion: The adoption of the WBFP Waiver Order would not directly cause potential noise impacts. However, a small WBF processing facility enrolled in and regulated by the WBFP Waiver Order may cause some noise impact from operation of the facilities wastewater treatment and disposal system or the land application of process solids. These noise levels are not expected to have a substantial change from existing baseline conditions. The WBFP Waiver Order does not

authorize construction of a small WBF processing facility in an area within an airport land use plan or in the vicinity of a private airstrip. Such decisions are within the purview of the local land use authority including the planning and building departments.

Construction activities associated with improving or repairing an existing WBF processing facility wastewater treatment and disposal system would be temporary and of short duration, resulting in a less than significant impact.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential direct impact of the WBF processing facility project on noise levels will be evaluated and appropriate mitigation measures implemented.

SECTION 13. POPULATION AND HOUSING. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area either directly (<i>e.g.</i> , by proposing new homes and businesses) or indirectly (<i>e.g.</i> , through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Population and Housing a), b), c): No Impact

Discussion: The adoption of the WBFP Waiver Order would not directly or indirectly induce substantial population growth. Existing small WBF processing facilities seeking enrollment under the WBFP Waiver Order to discharge process wastewater and process waste solids to land as a soil amendment are unlikely to cause substantial population growth in an area, or displace housing or people. Existing small WBF processing facilities have already been constructed and are currently operating in a specific location with established roadways and infrastructure in place which would be considered part of the existing baseline conditions.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential direct impact of the WBF processing facility project on population and housing will be evaluated and appropriate mitigation measures implemented.

SECTION 14. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Public Services a), b), c), d) and e): No Impact

Discussion: The adoption of the WBF Waiver Order would not directly impact public services. Existing small WBF processing facilities seeking enrollment under the WBF Waiver Order for the purpose of discharging process wastewater and process waste solids to land would not result in a need for new or altered fire protection services, police protection services, schools, parks, or other public facilities. These existing small WBF processing facilities have already been constructed and are currently operating in a specific location with established public services and would be considered part of the existing baseline conditions.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential direct

impact of the WBF processing facility project on public services will be evaluated and appropriate mitigation measures implemented.

SECTION 15. RECREATION. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Recreation a) and b): No Impact

Discussion: The adoption of the WBFP Waiver Order would not directly cause any impacts to recreation facilities. Existing small WBF processing facilities seeking enrollment under the WBFP Waiver Order for the purpose of discharging process wastewater and process waste solids to land would not directly cause the deterioration or expansion of an existing recreation facility or cause the need to construct a new recreational facility.

The construction of expanding or new small WBF processing facilities will be subject to local land use permits and an associated project-level CEQA review, at which time the potential direct impact of the WBF processing facility project on recreational facilities will be evaluated and appropriate mitigation measures implemented.

SECTION 16. TRANSPORTATION / TRAFFIC. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Transportation/Traffic a), b), c), d) e) and f): Less than Significant Impact

Discussion: The adoption of the WBFP Waiver Order would not directly cause any impacts to transportation or traffic. Existing small WBF processing facilities seeking enrollment under the WBFP Waiver Order for the purpose of discharging process wastewater and process waste solids to land would not directly cause a change in the capacity of an existing circulation system, conflict with a congestion management program, result in a change in air traffic patterns, increase traffic hazards, or result in inadequate emergency access. These existing small WBF processing facilities have already been constructed and are currently operating in a specific location with established transportation structures, and emergency access and would be considered part of the existing baseline conditions.

The WBFP Waiver Order does not address, preempt, or supersede the authority of local policies or ordinances in supporting transportation or traffic. Therefore, conflicts with such plans, policies or ordinances are unlikely to occur.

Construction of new or expanding small WBF processing facilities is subject to local agency approvals, general plans, permits, and possibly a project-level CEQA review, at which time potential adverse impacts must be evaluated and appropriate mitigation measures implemented. Potential impacts may include temporary impacts on traffic from the mobilization of earth-moving equipment and construction materials to and from the sites and the projected total new trips generated to access the processing facility. The long-term operation and maintenance of the wastewater treatment and disposal system serving the new or expanded small WBF processing facility is unlikely to be a significant trip generating activity.

SECTION 17. UTILITIES AND SERVICE SYSTEMS. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

CEQA: Initial Study and Environmental Checklist

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Utilities and Service Systems a) b), c), d and e): No Impact

Discussion: The adoption of the WBFP Waiver Order by the Regional Water Board will not cause a direct impact on the capacity of public water or wastewater treatment facilities or storm drainage. Existing small WBF processing facilities seeking enrollment under the WBFP Waiver Order for the purpose of discharging process wastewater and process waste solids to land would not directly cause a change in the capacity of an existing public water or wastewater treatment facility or storm drainage. These existing WBF processing facilities have already been constructed and are currently operating in a specific location with an established water supplier, wastewater treatment service and storm drainage systems.

Construction of new or expanding WBF processing facilities is subject to local agency approvals, general plans, permits, and possibly a project-level CEQA review, at which time potential adverse impacts must be evaluated and appropriate mitigation measures implemented.

Utilities and Service Systems f) and g): No Impact

Discussion: The adoption of the WBFP Waiver Order by the Regional Water Board will not cause a direct impact on solid waste services or landfill services. Existing small WBF processing facilities seeking enrollment under the WBFP Waiver Order for the purpose of discharging process wastewater and process waste solids to land would not directly cause a change on solid waste or landfill services. These existing WBF processing facilities have already been constructed and are currently operating in a specific location with established solid waste and landfill services.

Construction of new or expanding WBF processing facilities is subject to local agency approvals, general plans, permits, and possibly a project-level CEQA review, at which time potential adverse impacts must be evaluated and appropriate mitigation measures implemented.

SECTION 18. MANDATORY FINDINGS OF SIGNIFICANCE. Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Mandatory Findings of Significance a): Less than Significant Impact

Discussion: The WBFP Waiver Order only addresses and authorizes small discharges of process wastewater and process solids to land. Direct or indirect discharges to surface water are prohibited under the WBFP Waiver Order. Furthermore, the discharge of WBF processing wastewater and processing solids shall not affect beneficial uses of groundwater and surface water, or cause an exceedance of any applicable Basin Plan water quality objective for

groundwater and surface water. As a result, surface water quality, groundwater quality and aquatic species are unlikely to be affected. The WBFP Waiver Order is expected to improve water quality in the areas where discharges of small volumes of WBF processing waste are currently taking place by identifying such discharges, gathering information on the existing treatment and disposal methods, requiring compliance with conditions of the WBFP Waiver Order, and requiring annual monitoring and reporting. Additionally, the WBFP Waiver Order will allow for a more stream-lined permitting process for these smaller discharges of WBF processing waste to land and will expand coverage to other food and beverage processing facilities in addition to wine processing facilities. Any impacts to biological resources and cultural resources are expected to be less than significant. Based upon these analyses, the adoption of the WBFP Waiver Order will not: degrade the quality of the environment; substantially reduce the habitat of 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 major periods of California's history or prehistory.

A project specific CEQA evaluation will be performed for new construction or expansion of WBF processing facilities seeking coverage under the WBFP Waiver Order; the potential for the factors to be degraded will be evaluated on a site-specific basis at that time. Expanding or new WBF processing facilities whose discharges would be regulated under the WBFP Waiver Order are subject to local planning policies and building permits and may be required to undergo project-level CEQA review, at which time potential adverse impacts and appropriate mitigation measures will be evaluated and implemented in accordance with local, state, and federal requirements.

Mandatory Findings of Significance b): Less than Significant Impact

Discussion: The adoption of the WBFP Waiver Order would not result in cumulatively considerable impacts. The WBFP Waiver Order is a regulatory mechanism that will apply to eligible WBF processing facilities, seeking enrollment under the WBFP Waiver Order.

Construction of any new or expanding small WBF processing facilities will be subject to local planning policies and building permits and may be required to undergo project-level CEQA review.

As described in Section I of this Initial Study, *Environmental Factors Potentially Affected*, the proposed WBFP Waiver Order could be used to regulate small WBF processing facilities throughout the North Coast Region, and thus the evaluation of the environmental factors does not address a specific site or WBF processing facility. Any foreseeable changes to the processes and operations of an existing WBF processing wastewater system due to enrollment under the WBFP Waiver Order, such as repairing an existing wastewater treatment and disposal system, installing lighting to better observe operation of the wastewater system are expected to result in less than significant impacts. Individually these actions are expected to have a less than significant impact and cumulatively they are expected to have a less than significant impact.

Additionally, enrollment of a WBF processing facility under the WBFP WDR Order is unlikely to change the land development economics. Therefore it will not change the number of WBF processor facilities in the north coast region or the number of wastewater treatment systems constructed to properly treat and dispose of those facilities' process wastewater.

Construction of a new or expanding WBF processing facilities will be subject to local planning policies and building permits and may be required to undergo project-level CEQA review. It is at the discretion of each local land use authority whether to allow the construction of new or expanded WBF processing facilities in a given area. Local land use authorities also have discretion over more specific siting and design requirements. Therefore, it is speculative to analyze the cumulative impacts associated with constructing new WBF processing facilities in a given area.

Mandatory Findings of Significance c): Less than Significant Impact

Discussion: The adoption of the WBFP Waiver Order would not result in an environmental effect that will cause substantial adverse effects on human beings. Existing WBF processing facility regulated by the WBFP Waiver Order that are discharging process wastewater and process solids to land in compliance with the WBFP Waiver Order are not expected to cause a substantial adverse effects on human beings. The implementation of the monitoring and reporting program, and specific and general conditions required by the WBFP Waiver Order may improve certain environmental conditions, such as groundwater and surface water quality, thus benefitting human beings, either directly or indirectly.

Construction of new or expanding WBF processing facilities is subject to local agency approvals, general plans, permits, and possibly a project-level CEQA review, at which time potential adverse effects on human beings, either directly or indirectly must be evaluated and appropriate mitigation measures implemented.