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ENVIRONMENTAL PROTECTION

San Diego Regional Water Quality Control Board

Draft Initial Study and Environmental Checklist

Proposed Adoption of General Waste Discharge Requirements for the Commercial Agricultural Operations Regulatory Program

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I. INITIAL STUDY

A. PROJECT TITLE

Proposed Adoption of General Waste Discharge Requirements for Discharges from Commercial and Agricultural Operations for Third-Party Groups, Members of Third-Party Groups, and Dischargers not Participating in a Third-Party Group by the California Regional Water Quality Control Board, San Diego Region.

B. LEAD AGENCY

California Regional Water Quality Control Board, San Diego Region
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C. CONTACT PERSON

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D. PROJECT LOCATION

The Project is located within the jurisdictional boundaries of the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board). The San Diego Region is located in the southwest corner of California and occupies approximately 3,900 square miles. The western boundary of the San Diego Region is the 85 miles of the Pacific Ocean coastline from southern Orange County, California to the U.S. and Mexico international border. The northern boundary of the San Diego Region is formed by the hydrologic divide starting near Laguna Beach and extending inland through El Toro and easterly along the ridge of the Elsinore Mountains into the Cleveland National Forest. The eastern boundary of the San Diego Region is formed by the Laguna Mountains and other lesser known mountains located in the Cleveland National Forest. The southern boundary of the Region is formed by the U.S. and Mexico international border.

E. PROJECT SUMMARY

The San Diego Water Board is preparing two general waste discharge requirements orders (collectively referred to herein as General Orders):

1. Tentative Order No. R9-2016-0004, *General Waste Discharge Requirements for Discharges from Commercial Agricultural Operations for Third-Party Groups and Members.*
2. Tentative Order No. R9-2016-0005, *General Waste Discharge Requirements for Discharges from Commercial Agricultural Operations for Dischargers Not Participating as Members of Third-Party Groups.*

This Initial Study is prepared to address California Environmental Quality Act (CEQA) requirements for the discretionary action of adopting the General Orders and the resulting potential for reasonably foreseeable effects on the environment that may have. The San Diego Water Board has discretion whether to use the General Orders or

individual waste discharge requirements for regulatory coverage. Commercial farms, nurseries, orchards and medicinal cannabis cultivators (collectively referred to as Agricultural Operations) will be eligible for coverage under the General Orders. The General Orders will regulate discharges to groundwater and to surface water from Agricultural Operations, and will be applicable throughout the San Diego Water Board jurisdictional boundaries. This Initial Study analysis is limited to the general effects associated with the construction and implementation of new and/or expanded management practices designed to control or eliminate irrigation runoff, storm water runoff and other non-storm water runoff discharges from Agricultural Operations

Waste discharges from Agricultural Operations to surface waters and groundwaters are subject to regulation by the Regional Water Quality Control Boards (Regional Water Boards). Regional Water Boards may regulate waste dischargers through the issuance of waste discharge requirements (WDRs). WDRs require the discharge to conform to the Porter-Cologne Water Quality Control Act (Porter-Cologne Act), the Regional Water Board's Water Quality Control Plan (Basin Plan), and applicable policies of the State Water Resources Control Board (State Water Board) and Regional Water Board. The Regional Water Boards may prescribe general WDRS (e.g. General Orders) to a category of dischargers, such as Agricultural Operations, rather than issue individual waste discharge requirements to separate entities. General Orders are adopted to efficiently address applications for WDRs when discharges contain similar waste constituents and are treated or managed using similar methods.

F. PROJECT DESCRIPTION

Irrigation runoff, other non-storm water runoff, and storm water runoff from Agricultural Operations can contain pesticides, fertilizers, pathogens, and other pollutants that have been shown to adversely affect the quality of surface waters and groundwater in the San Diego Region.

If adopted, the first General Order comprising the Project will allow Agricultural Operations to form discharger coalitions (referred to as Third-Party Groups), which will be responsible for complying with several requirements of the General Order. The General Order will assign certain requirements to the individual Agricultural Operations (Members) and certain requirements to the Third-Party Group. Each Member must implement management practices to minimize waste discharges to surface waters and groundwater, and comply with receiving water limitations which prohibit the Member from causing or contributing to exceedances of applicable water quality objectives in surface water and groundwater. Each Member is also responsible for conducting farm evaluations, and completing yearly education in water quality control techniques, to document the Member's management practices. The Third-Party Group collects data from Members regarding management practice implementation, conducts regional surface water monitoring, pays annual WDR fees to the State Water Board, and analyzes and reports aggregated information on such implementation to the San Diego Water Board.

The second General Order comprising the Project will apply to Agricultural Operators who elect not to participate in a Third-Party Group, or are issued individual WDRs. The chief elements of the second General Order include similar requirements for education, monitoring of receiving waters, annual reporting, requirements to implement and evaluate management practices to minimize discharges of wastes to surface waters and groundwaters and receiving water limitations.

Although the San Diego Water Board's consideration and adoption of the General Orders will have no environmental effect, the reasonably foreseeable actions needed to comply with the requirements in the General Orders can potentially affect the environment. These potential environmental effects are evaluated in this Initial Study and Environmental Checklist.

The most reasonably foreseeable methods that a discharger may utilize to comply with the requirements in the General Orders include both non-structural and structural management practices to control or eliminate discharges of waste. The San Diego Water Board is prohibited under Water Code section 13260 from specifying the design, location, type of construction, or particular manner of compliance with its orders, and dischargers can comply in any lawful manner. The actual environmental impacts of the management practices will depend upon the compliance strategy selected by the individuals enrolled in the General Order. Typical non-structural and structural controls are described below.

1. Non-structural Controls

Non-structural controls address the source of pollution and generally do not involve new construction. Non-structural controls are expected to be the first methods to be utilized by the permittee. The following are examples of non-structural controls that may be applicable to Agricultural Operations:

- a. Proper Irrigation, Fertilizer, and Pesticide Application
- b. Proper Material/Waste Management
- c. Agricultural Operation Inspection and Maintenance
- d. Design, Sizing and Location of Agricultural Operations
- e. Education

2. Structural Controls

Structural controls are management practices that divert, store, and/or treat wastes prior to being discharged to waters of the State. Types of structural controls include:

- a. Riparian Buffers, Buffer Strips and Vegetated Swales
- b. Infiltration Trenches
- c. Diversion and Containment Systems

G. SURROUNDING LAND USES AND SETTING

The San Diego Region encompasses most of San Diego County, parts of southwestern Riverside County, and southwestern Orange County. The San Diego Region is divided into a coastal plain area, a central mountain-valley area, and an eastern mountain-valley area. It consists of eleven hydrologic units that ultimately drain to the Pacific Ocean.

The San Diego Region's climate is generally mild with annual temperatures averaging around 65°F near the coastal areas. Average annual rainfall ranges from 9 to 11 inches along the coast to more than 30 inches in the eastern mountains. There are two distinct seasons in the San Diego Region. Summer dry weather occurs from late April to mid-October. During this period almost no rain falls. The winter season (mid-October through early April) consists of generally dry weather interspersed by occasional rain storms.

Eighty-five to 90 percent of the annual rainfall occurs during the winter season. Changes to the climate are expected as a result of global climate change.

The land use of the San Diego Region is highly variable. The western coastline areas are highly developed with industrial, commercial, and residential land uses, and the inland areas primarily consist of open space. The predominant land uses in the San Diego Region are open space or recreational land use, followed by low-density residential and agriculture/livestock land uses. Other major land uses are commercial/institutional, high-density residential, industrial/transportation, military, transitional, and water.

H. BASELINE CONDITIONS

This environmental analysis considered potential environmental impacts of adoption of the General Orders. Specifically, it considers actions that may be taken to comply with the General Orders beyond baseline conditions. The determination of baseline conditions includes an evaluation of how the San Diego Water Board's previously regulated Agricultural Operations.

If adopted, the General Orders will require Agricultural Operations to implement management practices to control or eliminate discharges of waste. These activities will occur at locations where the environment has already been disturbed due to existing Agricultural Operations.

I. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project. Please see the checklist beginning on page 8 for additional information.

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

J. DETERMINATION

On the basis of this initial evaluation

<input checked="" 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 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:

 Mr. Barry S. Pulver, PG, CHG, CEG
 Engineering Geologist
 California Regional Water Quality Control Board, San Diego Region

Date:

II. 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Aesthetics a), b), c), and d): No Impact

Discussion: The adoption of the General Orders would not directly impact aesthetics within the Project area. Reasonably foreseeable management practices would not be of the size or scale that would:

- 1) Obstruct the view of a scenic vista.
- 2) Damage scenic resources.
- 3) Degrade the existing visual character or quality of a site or its surroundings.
- 4) Create a new source of substantial light or glare that would adversely affect day or nighttime views.

SECTION 2 - AGRICULTURAL AND FOREST RESOURCE. 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 type="checkbox"/>	<input checked="" 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), c), and d): No Impact

Discussion: Adoption of the General Orders will not change zoning or land use designations. The General Orders will not conflict with existing zoning for, or cause rezoning of agricultural land, forest land, or timberland, or the loss of forest land or conversion of forest land to non-forest land use. The adoption of the General Orders will not conflict with existing Williamson Act contract.

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

Discussion: Adoption of the General Orders will not result in the loss of forest land or the conversion of forest land to non-forest use because it will not require the conversion of forest land to non-forest land use. The economic burden of the implementation of reasonably foreseeable management practices and compliance with the monitoring and reporting program may result in a small number of Agricultural Operations ceasing commercial operations. These Agricultural Operations are likely to be small growers, commonly called hobby farms. These agricultural properties are located on parcels zoned as agricultural or residential with minimum lot sizes that would prevent increased residential densities or the conversion to non-agricultural or non-residential land use. The cessation of commercial activities would not result in the land being converted to non-agricultural land use.

SECTION 3 - AIR 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) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Air Quality a), b), c), and d): No Impact

Discussion: Adoption of the General Orders will not impact air quality. Reasonably foreseeable management practices are not expected to be on a scale large enough that would result in significant conflict with or obstruction of an applicable air quality plan, or expose sensitive receptors to substantial pollutant concentrations.

Air Quality e): Less than Significant Impact

Discussion: Objectionable odors may result from construction of reasonably foreseeable structural controls, but are expected to be short-term and limited to the immediate construction area. These limited, short-term exposures are not expected to be on a scale large enough that would result in the significant creation of objectionable odors affecting a substantial number of people.

Sources of limited, short-term objectionable odors may be the result of the following:

- a) Exhaust from construction equipment and vehicles used for the construction and installation of structural controls.
- b) Odors from retention basins should stagnant water conditions occur.

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, etc.) through direct removal, filling, hydrological interruption or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Biological Resources c), e), and f): No Impact

Discussion: Adoption of the General Orders will not impact biological resources. Reasonably foreseeable management practices are not expected to be on a scale large enough that would result in direct removal or filling of riparian habitat, wetlands, or any sensitive natural communities or conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Biological Resources a), b), and d): Less than Significant Impact

Discussion: Reasonably foreseeable management practices will have less than significant impact on biological resources. The rationale for this conclusion is as follows:

- 1) Reasonably foreseeable structural controls are not expected to be on a scale large enough that would result in the significant impacts to biological resources.
- 2) The elimination of irrigation return flows could result in a reduction of stream flows in historically non-perennial streams. The reduction of non-storm water flows during the dry season will return dry weather flows of perennialized streams to a more natural, pre-development condition. This would be benefit native, indigenous species.
- 3) Structural controls, such as vegetated swales or buffer strips, could increase the diversity or number of species, which is beneficial by creating habitat for those species.
- 4) Structural controls could divert, or reduce storm water runoff discharge, which could decrease the number and/or diversity of species within the stream channels and create habitat where native species can thrive.
- 5) Projects that may implement structural controls to comply with the General Orders are not expected to be of the size or scale that could result in change in a significantly adverse change in diversity of species, or numbers of any species.
- 6) Non-structural controls will not result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife (DFW) or United States Fish and Wildlife Service (USFWS) because the controls would not introduce any physical effects that could impact these characteristics.
- 7) The General Orders do not authorize any action that may adversely affect any unique, rare, or endangered species. To protect sensitive species a focused protocol plant survey and/or a search of the California Natural Diversity Database should be performed to identify and protect potentially sensitive or special status species in the site area. If sensitive species occur on the project site, mitigation measures should be developed in consultation with the DFW and USFWS.
- 8) Non-structural controls will not 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 because the controls would not introduce any physical effects that could impact these characteristics.
- 9) The reduction or elimination of irrigation return flows could result in a barrier to the migration or movement of animals especially in the dry weather season by eliminating habitat dependent on those flows. If dry weather flows return to a more natural, pre-development condition, animal species that thrived in the creek and stream channels in the absence of nuisance flows are not expected to be adversely impacted by habitat changes.

- 10) Implementing structural controls would not foreseeably introduce new species. Construction of reasonably foreseeable structural controls likely would not restrict wildlife movement because the sizes of structural controls are generally too small to obstruct a corridor.
- 11) Terrestrial animal corridors would be maintained regardless of stream flow as reduced flows would not cause physical barriers for these animals. In the event that any structural controls, such as animal exclusion controls, impede some wildlife migration, design features such as fence gaps large enough to allow migrating wildlife to pass through could be included in the design.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Cultural Resources a), b), c), d), and e): No Impact

Discussion: Adoption of the General Orders will have less than significant impacts on cultural resources. At most sites, reasonably foreseeable management practices are not expected to result in a substantial adverse change in the significance of a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, disturb any human remains, or cause a substantial adverse change in tribal cultural resources because most management practices will be implemented in previously disturbed agricultural lands.

However, compliance with the General Orders may, at times, require excavation or earth moving activities of previously undisturbed soils. A cultural resource investigation shall be required under the General Orders prior to any substantial soil disturbance in a previously undisturbed area. The purpose of this investigation is to avoid impacts by identifying cultural resources, including tribal cultural resources as defined in Public Resources Code section 21704, before soil disturbance occurs. The cultural resources investigation will include a search of relevant records, databases, and published literature to identify cultural resources on the property. Should cultural resources be identified, the impacts will be less than significant because the proposed excavation site shall be moved to another area of the property to the greatest extent feasible.

Additionally, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity. Should human remains be discovered during excavation or earth moving activities, the impacts will be less than significant because California law provides for the sensitive treatment

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and disposition of those remains (Health & Safety Code, section 7050.5; Public Resources 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Geology and Soils a), i), ii), iii), iv), c), d), and e): No Impact

Discussion: Adoption of the General Orders would have no impact on geology and soils. The rationale for this conclusion is as follows:

1. Reasonably foreseeable management practices are not expected to be on a scale large enough that would result in exposure of people or structures to geologic hazards because none of these controls would result in earth moving activities.

2. Reasonably foreseeable structural controls will not be located in unstable geologic units and are not expected to be on a scale large to potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
3. Reasonably foreseeable structure controls will not be located in unstable geologic units and are not expected to be on a scale large to potentially result in loss of life or property resulting from soil expansion.
4. Reasonably foreseeable structural controls will not have any effect on siting of septic tanks or alternate wastewater disposal systems.

Geology and Soils b): Less than Significant Impact

Discussion: Adoption of the General Orders would have less than significant impact on geology and soils. Reasonably foreseeable management practices are not expected to be on a large enough scale that would result in increase in wind or water erosion of soils, either on or off site because none of the non-structural controls would result in increased surface runoff discharge, or in exposing soils to erosion by wind and water.

The installation of structural controls may result in minor soil disturbance. However, construction-related erosion impacts will be short-term and will end with the cessation of construction. Wind or water erosion of soils may occur as a potential short-term impact. Typical established best management practices should be used during to minimize offsite sediment runoff or deposition. Structural controls are not expected to be of the size or scale that could result in significant erosion of soils, either on or off the site.

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"/>

Greenhouse Gas Emissions a) and b): Less than Significant Impact

Discussion: Adoption of the General Orders would have less than significant impact on greenhouse gas emissions. The rationale for this conclusion is as follows:

1. Construction and installation of structural controls may result in the short-term generation of greenhouse gases due to exhaust from construction equipment and vehicles. These reasonably foreseeable structural controls, however, are not expected to be on a scale large enough that would result in the significant generation of greenhouse gases.
2. Reasonably foreseeable management practices are not expected to be on a scale large enough that would result in conflict with any applicable plan, policy or agency adopted regulation for the purpose of reducing the emissions of greenhouse gases.

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"/>
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"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Discussion: Adoption of the General Orders would have not directly result in potential impacts associated with hazards and hazardous materials. The rationale for this conclusion is as follows:

1. Reasonably foreseeable management practices are not expected to be of a large enough scale that would create a significant hazard to the environment from transport or disposal of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation).
2. Reasonably foreseeable management practices will not result in a release of hazardous substances (including, but not limited to oil, pesticides, chemicals

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or radiation) as a result of a reasonably foreseeable upset or accident conditions. The reasonably foreseeable management practices included in this evaluation would not cause the release of hazardous substances in the event of an accident because these types of substances would not be present.

3. Reasonably foreseeable management practices will not involve hazardous emissions or the handling of hazardous or acutely hazardous materials, substances. In addition, the Orders would not induce a project that would involve emission or generation of hazardous wastes. Individual projects would be required to obtain any necessary permits from the appropriate public or government agencies, and in compliance with CEQA, evaluate impacts from hazards and hazardous materials.
4. The General Orders would not induce a project that would be located within an airport land use plan. However, individual projects would be required to obtain any necessary permits from the appropriate public or government agencies, and in compliance with CEQA, evaluate impacts from hazards and hazardous materials.

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 type="checkbox"/>	<input checked="" 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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), b), and f): No Impact

Discussion: Adoption of the General Orders would have not violate any water quality standards or waste discharge requirements, result in potential impacts, deplete groundwater supplies, or interfere substantially with groundwater recharge. The rationale for this conclusion is as follows:

1. The management practices required by the General Orders will eliminate or reduce the existing loading of pollutants to the waters of the State. This will improve water quality.
2. The management practices required by the General Orders may include actions that will result in the increased groundwater recharge.

Hydrology and Water Quality g), h), i), and j): No Impact

Discussion: Adoption of the General Orders does not entail construction of new housing or structures, or expose people or structures to a significant risk of loss, injury, or death from flooding or inundation by seiche, tsunami, or mudflow.

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

Discussion: Adoption of the General Orders will not have a direct impact on the alteration of existing drainage patterns or create or contribute runoff water exceeding a drainage systems capacity. The rationale for this conclusion is as follows:

1. Structural and non-structural controls would not be of the size or scale to result in significant changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff. Implementation of the management practices required by the General Orders is expected to minimize the amount of erosion occurring on and off the site.
2. Grading and excavation during construction and installation of structural controls could result in alterations in absorption rates, drainage patterns, and surface water runoff. Several types of structural controls collect and/or inhibit surface water runoff flow, which could alter drainage patterns and/or decrease the rate and amount of surface water runoff. For example, buffer strips (a form of structural control) would increase infiltration rates and reduce the amount of runoff to the adjacent water body. The amount of flow within the water body may change; however, the drainage pattern would remain essentially unchanged. Projects that may implement structural controls to comply with the General Orders are not expected to be of the size or scale that would result in significant changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff.
3. Reasonably foreseeable management practices would not be of the size or scale to 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. Implementation of management practices required by the General Orders is expected to minimize the amount of polluted runoff.

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: Adoption of the General Orders 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.

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: Adoption of the General Orders will have no effect on mineral resources. The management practices required by the General Orders 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.

SECTION 12 - NOISE. Would the project:

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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Noise a), b), c), e), and f): No Impact

Discussion: Adoption of the General Orders will not cause potential noise impacts. The management practices required by the General Orders will not result in noise impacts greater than baseline conditions.

Noise d): Less than Significant Impact

Discussion: Adoption of the General Orders will not directly cause potential noise impacts. The construction and installation of structural controls could result in temporary increases in existing noise levels, but any impacts are expected to be short-term, localized impacts that would exist only in close proximity to the construction area. The type and duration of noise impacts due to installation of any structural controls are not expected to be significant.

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 (e.g., by proposing new homes and businesses) or indirectly (e.g., 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), and c): No Impact

Discussion: Adoption of the General Orders will not directly or indirectly induce substantial population growth.

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 ratios, 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: Adoption of the General Orders will not directly or impact public services.

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: Adoption of the General Orders will not cause any impacts to recreational facilities.

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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Transportation/Traffic a), b), c), d), e), and f): No Impact

Discussion: Adoption of the General Orders will not directly cause any impacts to transportation or traffic. Reasonably foreseeable management practices would be installed on existing agricultural operations and not cause any impact to areas beyond the limits of the agricultural operation. The transportation of equipment and material needed for the installation of structural controls will be minimal, and are not expected to cause any impacts to transportation or traffic. Water sampling required to comply with the monitoring requirements will also be minimal and will not cause any impacts to transportation or traffic.

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"/>
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 checked="" type="checkbox"/>	<input 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), and e): No Impact

Discussion: Adoption of the General Orders will not directly cause any impacts to utilities and service systems. Reasonably foreseeable management practices would not be of the size or scale that to exceed wastewater treatment capacity and/or requirements.

Utilities and Service Systems d): No Impact

Discussion: Adoption of the General Orders will not directly cause any impacts on water supplies. Implementation of reasonably foreseeable management practices will only require minor amounts of water and will not have any impact on water supplies. The requirement to apply irrigation water at agronomic rates and the elimination of irrigation runoff will result is a decrease in water use.

Utilities and Service Systems f): No Impact

Discussion: Adoption of the General Orders will not directly cause any impacts on solid waste services or landfill services. Implementation of reasonably foreseeable management practices may generate solid waste, but the amounts would be minor and will not have any impact on solid waste services or landfill services.

Utilities and Service Systems c): Less than Significant Impact

Discussion: Adoption of the General Orders will not directly cause any impacts to the existing storm drain system. Structural controls may alter existing storm water flow patterns, but would not add to the volume of storm water entering the existing storm water system.

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: As discussed above in Section 4 - Biological Resources of this Environmental Checklist, plant and animal species could potentially be affected due to the reduction or elimination of nuisance flows, especially in the dry weather season. However, projects that implement management practices to comply with the Orders are not expected to be of the size or scale that could result in significant changes that could have an adverse effect on native plant and animal species. In addition, individual projects are subject to further CEQA evaluation on a site-specific basis from appropriate local or State agencies prior to implementation.

Mandatory Findings of Significance b): Less than Significant Impact

Discussion: Cumulative impacts, as defined in the CEQA Guidelines,¹ refer to two or more individual effects, that when considered together, are considerable or that increase other environmental impacts. Cumulative impacts associated with complying with the Orders and other water quality control programs are expected

¹ Cal. Code Regs. title. 14, section 15355.

to be less than significant. Non-structural controls are expected to be the most likely initial strategy for complying with the Orders, and because of their nature (i.e., plans, educations, inspections, etc.), are not expected to have negative effects on the environment.

The permittees may use structural controls to minimize or eliminate the transport of pollutants to the waters of the State. Doing so may increase the likelihood of potential impacts to the environment that may have significant cumulative impacts. The construction of structural controls could have short-term cumulative effects. However, these effects are not cumulatively considerable in the long-term because the effects will cease with the completion of construction.

Compliance with the General Orders could result in less than significant environmental impacts. Agricultural Operations that implement non-structural and/or structural controls to comply with the General Orders are not expected to be of the size or scale that could result in any significant impacts on the environment, even when considered cumulatively.

Mandatory Findings of Significance c): Less than Significant Impact

Discussion: Reasonably foreseeable and properly implemented non-structural and/or structural controls would not be of a size or scale that would cause substantial adverse effects on human beings, either directly or indirectly.

Discharger's compliance with the General Orders is not expected to result in substantial adverse effects on human beings, and the implementation of management practices required by the Orders is expected to improve environmental conditions, benefitting human beings, either directly or indirectly.

CEQA states that economic or social effects of a project shall not be treated as significant effects on the environment.² While the economic burden to comply with the General Orders may result in a relatively small loss of agricultural production, it is not expected to result rezoning of areas designated for agricultural land use.

² Pub. Resources Code, Section 21083.