

November 19, 2008 DRAFT

**DRAFT STAFF REPORT
AND
CERTIFIED REGULATORY PROGRAM ENVIRONMENTAL ANALYSIS
FOR THE
STATE WATER RESOURCES CONTROL BOARD
RECYCLED WATER POLICY**

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Section 1: Project Description

1- A: Purpose of Proposed Policy

Increasing the use of recycled water is a major part of the state's plan for addressing its water supply needs. Drought, the health of the Delta ecosystem and reduced snowpack caused by global warming, present challenges that will likely limit the state's developed water supply. The state needs to encourage the development of recycled water projects to address the water demands of its population, businesses, industries and agricultural producers.

In 1999, the Legislature authorized the establishment of the Recycled Water Task Force (Task Force). The Task Force included representatives from water utilities, public interest groups, federal, state, and local government, agency and industry associations, and the University of California. The Task Force issued its final report in June 2003, which included numerous recommendations for increasing the use of recycled water in the state. Two of the primary Task Force recommendations are increasing funding and reducing regulatory uncertainty.

Although the State Water Resources Control Board (State Water Board) has an existing Recycled Water Policy (Resolution No. 77-1) that encourages the use of recycled water, this existing policy has not provided uniform interpretation of regulatory requirements throughout the state. In April 2006, during its hearing on the Alamitos Barrier Recycled Water Project,¹ the State Water Board decided to update its Recycled Water Policy to address the need for more uniform interpretation of regulatory requirements.

This proposed Recycled Water Policy (Policy) would reduce uncertainty regarding the regulatory requirements for recycled water use by providing a uniform interpretation of state statutes, regulations, and policies. It has been drafted through a collaborative process including representatives from public interest groups, local agencies, and agency and industry associations (the stakeholders). The stakeholders have been supported by members of the State Water Board and their staff. The proposed Policy is a key step in implementing the Task Force recommendations.

1-B: Scope of Proposed Policy

The proposed Policy sets forth the State Water Board's commitment to encourage the use of recycled water by:

- Outlining the role of recycled water as part of a holistic strategy to increase the sustainability of the State's water supply;
- Establishing mandates for the use of recycled water;

¹ The Petition of Water Replenishment District of Southern California, WaterReuse Association and County Sanitation Districts of Los Angeles County for Review of Waste Discharge and Water Recycling Requirements for the Alamitos Barrier Recycled Water Project, Order No. R4-2005-0061, issued by the Los Angeles Regional Water Board.

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- Clarifying the roles among the State Water Board, the Regional Water Quality Control Boards (Regional Water Board), the California Department of Public Health (CDPH), the California Department of Water Resources (DWR), the California Public Utilities Commission (PUC) and water and wastewater agencies in encouraging and regulating recycled water use;
- Establishing requirements for the development of regional salt/nutrient management plans;
- Specifying permitting criteria for landscape irrigation and groundwater recharge projects including criteria for streamlined permitting;
- Providing mechanisms for resolving the fundamental tension between the State Water Board's commitment to water recycling and the State Water Board's "Statement of Policy with Respect to Maintaining High Quality of Waters in California." (Resolution No. 68-16, often referred to as the "Anti-Degradation Policy");
- Establishing a program to evaluate the risks of constituents of emerging concern (CECs) to public health and the environment; and
- Promoting incentives to encourage and facilitate recycled water use.

By addressing water quality issues in a comprehensive, holistic manner and outlining a strategy in which recycled water and storm water use can work together, the proposed Policy provides strategic guidance on resolving the full range of issues associated with a sustainable water supply for the state. This proposed Policy aids in implementing Resolution No. 2005-0006, which set sustainability as a core value for the State Water Board.

1-C: Components of the Proposed Policy

Mandate to Use of Recycled Water

The proposed Policy mandates an increase of 500,000 acre-feet per year (afy) in recycled water use by the year 2030. Achieving use consistent with this mandate assures that recycled water provides at least the minimum level of water supply envisioned by the most current California Water Plan.

The mandate in the proposed Policy requires collective action by water and wastewater agencies, the environmental community, the State Water Board, Regional Water Boards, DWR, and CDPH. The mandate assumes that regulatory streamlining, consistent with this proposed Policy, is implemented and commits the water associations and the environmental community to collective advocacy for funding recycled water projects.

To meet the mandates, the Policy states that agencies discharging recycled water shall make water available to water purveyors at reasonable rates and terms and that water

agencies shall make use of available recycled water, in accordance with the requirements of Water Code sections 275 and 13550 et. seq..

State Agency Roles

The proposed Policy explains the roles that state agencies have in managing the state's water supply. These agencies include the State Water Board, Regional Water Boards, CDPH, CDWR, and CPUC. The purpose of this section is to clarify the roles of each of these agencies in respect to recycled water projects.

Salt/Nutrient Management Plans

Increases in salt and nutrient concentrations in groundwater are a concern in many areas of the state. To resolve this concern, the proposed Policy would require the development of regional salt/nutrient management plans that provide holistic, watershed-based control of these constituents and that manage all sources of salts and nutrients as necessary to protect water quality. The proposed Policy requires that water and wastewater agencies lead the development of the salt/nutrient management plans and in a letter water and wastewater agencies have agreed to provide funding for the development. The proposed Policy requires completion of the salt/nutrient management plans within five years from the date of adoption of the proposed Policy, although the Regional Water Board can extend this deadline by two years if the stakeholders are making substantial progress toward the development of the plan. After receipt of the salt/nutrient management plans, the Regional Water Board would have to consider revising their Water Quality Control Plans (Basin Plans) to incorporate the procedures in the salt/nutrient management plans, where water quality objectives for salts or nutrients are being, or threatening to be, exceeded.

The salt/nutrient management plans would provide, in part:

- A level of detail that is dependent upon the site-specific characteristics;
- Anti-degradation analyses within each plan; and
- Provisions for regional monitoring.

The proposed Policy does not alter or affect existing adopted salt/nutrient management plans and does not require re-analysis in areas where the analysis has already been completed.

Landscape Irrigation Projects

The proposed Policy addresses incidental runoff and streamlined permitting of landscape irrigation. For control of incidental runoff of applied recycled water, the proposed Policy provides a definition for incidental runoff and contains requirements for ensuring that any runoff that occurs is no more than incidental as defined in the proposed Policy.

Under the proposed Policy, absent unusual circumstances, such as a site that has highly transmissive soils, a shallow depth to groundwater, and high quality groundwater, landscape irrigation projects are eligible for streamlined permitting if they: comply with

the Water Recycling Criteria in Title 22, California Code of Regulations²; develop and implement an operation and management plan that specifies agronomic rates and measures to ensure application at these rates; comply with any applicable salt and nutrient management plan; and take into account nutrient levels in recycled water when applying fertilizers. The proposed policy requires State and Regional Water Boards to consider within 90 days the adoption of requirements for landscape irrigation projects that meet eligibility requirements for permit streamlining. Existing law requires Regional Water Boards to issue waste discharge requirements within 140 days after submittal of a complete application, if the Regional Water Board is a responsible agency under CEQA, and at least 90 days have expired since certification or approval of the environmental documentation by the lead agency. For recycled water irrigation projects meeting the criteria and eligible for enrollment under general permits, the Policy requires enrollment within 60 days from receipt of an application deemed complete by the State or Regional Water Board.

When adopting requirements for projects eligible for streamlined permitting, the proposed Policy does not allow the State or Regional Water Board to establish project-specific receiving water and groundwater monitoring requirements, unless such project-specific monitoring is required by a salt/nutrient management plan that has been adopted by the Regional Water Board. Nevertheless, during the interim period while a salt/nutrient management plan is being developed, a landscape irrigation project proponent can either perform project-specific monitoring or actively participate in the development of the salt /nutrient management plan, including basin/sub-basin monitoring.

For all landscape irrigation projects, the proposed Policy requires, in addition to any appropriate recycled water monitoring requirements, effluent monitoring for CECs once a year and priority pollutant twice a year.

The State Water Board is developing a general permit for use of recycled water for landscape irrigation as required by Assembly Bill 1481(Chapter 535, Statutes of 2008). The proposed Policy states that it is the State Water Board's intent that this general permit be consistent with the proposed Policy.

Recycled Water Groundwater Recharge Projects

Groundwater recharge projects recharge groundwater with recycled water for later extraction and use for municipal supply. There are two methods of recharge: through percolation ponds (also called spreading basins) and by injection through wells.

Groundwater recharge project proposals are evaluated by CDPH on a case-by-case basis, although CDPH is developing regulations for these projects. After completing an evaluation, CDPH issues a recommendation for a project. If the recommendation is to approve, the approval contains a set of conditions. After receiving an affirmative recommendation from CDPH, the Regional Water Board prepares an order that contains waste discharge and water reclamation requirements that include the CDPH

² California Code of Regulations, Title 22, sections 60301- 60355

conditions. Additional requirements may also be established to protect other uses besides municipal supply.

The proposed Policy contains two requirements that apply to groundwater recharge reuse projects. The first is that the project must comply with regulations adopted by CDPH or, in the interim until such regulations are approved, CDPH's recommendations for the project. The second is the implementation of a monitoring program for CECs that is consistent with the recommendation of the "blue ribbon panel" discussed below.

Anti-degradation

In 1968, the State Water Board adopted Resolution No. 68-16, which is often referred to as the Anti-Degradation Policy. Resolution No. 68-16 has been found by the State Water Board to apply to groundwater as well as surface water.

Resolution No. 68-16 requires that the State Water Board balance the preservation of "high quality waters" with the maximum benefit of the people of the state. It also requires the use of "best practical treatment and control" to protect "high quality" waters.

Specifically Resolution No. 68-16 states, in part:

"Whenever the existing quality of water is better than the quality established in policies as of the date on which such policies become effective, such existing high quality will be maintained until it has been demonstrated to the State that any change will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial use of such water and will not result in water quality less than that prescribed in the policies.

Any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in the best practicable treatment or control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained."

The proposed Policy provides direction on how to interpret this language when evaluating recycled water projects. The proposed Policy allows recycled water irrigation projects that meet the criteria for streamlined permitting and that are consistent with adopted Regional Water Board salt/nutrient management plans to be approved without further analysis of degradation. Until a salt/nutrient plan is adopted, a project that meets the criteria for streamlined permitting may be approved by a Regional Water Board without further analysis if it is demonstrated through a salt/nutrient mass balance or similar means that: (1) the project will use less than ten percent of the assimilative capacity of a basin/sub-basin or (2) for multiple projects, less than twenty percent of the available assimilative capacity.

For groundwater recharge projects, the proposed Policy states that a project that uses less than ten percent of the available assimilative capacity with respect to salts and

nutrients or for multiple projects uses less than 20% of the available assimilative capacity need only conduct an analysis verifying the use of assimilative capacity.

CECs

CECs include a wide range of chemicals that are being detected in our water supply at very low levels. Some are from personal care products and prescription and non-prescription drugs, which people use directly, at much larger concentrations. Some CECs have been found to have effects on fish at low concentrations.

The impacts of persistent but low-level exposure to CECs in the environment and the potential human-health implications are unknown. However, some Regional Water Boards have utilized the narrative water quality objectives for toxicity in their Basin Plans to establish enforceable limits for recycled water quality. Similar enforceable limits do not yet exist for potable water quality, because of the lack of scientifically based risk assessments. This practice of interpreting narrative objectives to establish enforceable limits results in a disincentive for recycled water use because the recycled water is regulated to a quality standard that exceeds the regulatory standard applied to potable water. At the same time, a firm scientific understanding of the effects of CECs and the appropriate standards for setting regulatory limits is necessary.

The proposed Policy states that knowledge regarding CECs is incomplete and establishes a “blue ribbon” advisory panel of scientific experts to provide guidance to the State Water Board on future actions.

Incentives for the Use of Recycled Water

The proposed Policy has provisions to provide incentives for the use of recycled water and storm water. These include a request to DWR to provide priority funding for recycled water projects and a directive to State Water Board staff to promote the use of the State Revolving Fund for water recycling and storm water use projects. The incentive section also includes a request to DWR to provide twenty million dollars in grant funds for the development of the salt/nutrient management plans.

Section 2 - Environmental Analysis

2-A: Mandate to Use Recycled Water

The proposed Policy’s mandate to increase the use of recycled water is consistent with previous direction provided by the state Legislature³ and the State Water Board.⁴ To achieve the mandate, the proposed Policy states that that State Water Board shall use the authority provided in Water Code sections 13550 *et seq.* This is essentially a statement that the State Water Board shall implement existing law.

³ California Water Code section 13577.

⁴ State Water Board Resolution No. 77-1

2- B: State Agency Roles

This section of the proposed Policy on State Agency Roles is a summary of roles established by existing statutory authority. It does not create new directives. Hence, its effect on the environment is less than significant.

2- C: Salt/Nutrient Management Plans

The proposed Policy requires the development of salt/nutrient management plans, consistent with California Water Code sections 13240 through 13242, which require the adoption of water quality control plans that establish water quality objectives and implementation plans for meeting these objectives. There are no significant environmental effects associated with the development of the salt/nutrient management plans, although there may be significant environmental effects associated with the implementation of the salt/nutrient management plans. The adoption of the salt/nutrient management plans is subject to the California Environmental Quality Act's (CEQA) certified regulatory program process, which would require review of the potential environmental effects of implementing the salt/nutrient management plans.

2- D: Landscape Irrigation Projects

The proposed Policy defines incidental runoff as unintended, small amounts of runoff from recycled water use areas, such as unintended, minimal over-spray from sprinklers that escape the recycled water use area. It states that incidental runoff may be regulated under waste discharge requirements or NPDES permits, including municipal separate storm sewer permits. As such, the proposed Policy may, in some cases, allow the discharge the incidental runoff of recycled water into a municipal separate storm sewer system. Any incidental runoff, however, would be minimal and would be limited by the requirements in the proposed Policy. The proposed Policy requires water recyclers to implement operation and management plans that include detection and correction of leaks, proper design and aim of sprinkler heads, refraining from application during precipitation events, and managing ponds to prevent discharge, except during extreme (25-year, 24-hour) storm events under approval by the appropriate Regional Water Board Executive Officer. With these requirements, the impacts of incidental runoff will be reduced to a less than significant level.

The proposed Policy establishes a streamlined permitting process for landscape irrigation projects that meet criteria specified in the proposed Policy. This shortened review period for recycled water irrigation projects eligible for streamlined permitting may create delays in the issuance of some waste discharge requirements for other types of discharges. The streamlined permitting, however, is not expected to have a significant effect on the environment.

The proposed Policy states that recycled water irrigation projects eligible for streamlined permitting shall not be required to include a project-specific receiving water and groundwater monitoring component. This requirement, however, does not apply if such monitoring is required by an adopted salt/nutrient management plan; and before a salt/nutrient management plan is adopted, a Regional Water Board may require either active participation in the development of a salt/nutrient management plan or project-

specific monitoring. The cost of such groundwater monitoring tends to discourage the use of recycled water, since Regional Water Boards do not require such monitoring for irrigation with potable water. Regional Water Boards, however, have occasionally required groundwater monitoring for some recycled water irrigation projects, which has created uncertainty about the regulatory requirements that would be applied to a recycled water irrigation project.

Under the proposed Policy, the goal of groundwater monitoring will be shifted from evaluating the effect of a specific irrigation site on groundwater to a regional monitoring program that evaluates the effect of all discharges to the groundwater basin. Section 6(b)(3) of the proposed Policy describes this regional monitoring program and how it must be included in the adopted salt/nutrient management plans.

The regional monitoring program will provide a more comprehensive means of evaluating groundwater quality than the current limited project-specific monitoring. Hence, the monitoring provisions for recycled water irrigation projects eligible for streamlined permitting will not have a significant environmental effect.

2-E: Recycled Water Groundwater Recharge Projects

The provisions for groundwater recharge projects do not limit the authority of Regional Water Boards. Hence, they will have no significant environment effect.

2-F: Anti-degradation

The intent of the proposed Policy is that degradation of groundwater quality be evaluated regionally, and that a regional salt/nutrient management plan be developed to address any degradation that may be occurring. After the plan is adopted, any proposed project that is consistent with the anti-degradation provisions of the plan would be found to be in compliance with the Anti-degradation Policy. Such a strategy will be more effective in preventing or limiting degradation and establishing more consistent requirements than the current case-by-case method of implementing the Anti-degradation Policy.

There will be a six to eight year period, however, during which the salt/nutrient management plans are being developed by the stakeholders and adopted by the Regional Water Boards. During this period, the proposed Policy allows projects that use less than ten percent of the available assimilative capacity within a groundwater basin or sub-basin, or for multiple projects less than twenty percent of the available assimilative capacity, to be approved without further anti-degradation analysis.

For landscape irrigation projects, the ten/twenty percent allowance is unlikely to have a significant effect on groundwater quality. Recycled water used for landscape irrigation must be of relatively high quality. Otherwise, the salt within the water will impair the growth of the plants being irrigated. The provision will also exist for only six to eight years, until the salt/nutrient management plans are adopted. This short duration will limit any potential impacts on groundwater quality.

For groundwater recharge projects, previously approved groundwater recharge projects have had effluent limitations that required compliance with CDPH primary and secondary maximum contaminant limitations. This requirement is unlikely to change if the proposed Policy is adopted. The purpose of a groundwater recharge reuse project is to recharge groundwater for later extraction and use as municipal supply. Hence, much of the recycled water used for recharge will later be extracted. The anti-degradation provisions of the proposed Policy are expected to provide an overall improvement in groundwater quality.

2-G: CECs

The proposed Policy establishes a “blue ribbon” scientific advisory panel to guide future State Water Board actions regarding CECs. These include endocrine disruptors, personal care products, pharmaceuticals, and other constituents such as antibiotic resistant bacteria or genes that may potentially be harmful to human health or the environment. Since the panel only has advisory power, its establishment will not have a significant environmental effect.

2- H: Incentives for the Use of Recycled Water

The section of incentives requests that CDWR provide grant funds for the development of salt/nutrient management plans and for the development of projects that have recycled water components. If these projects receive grants, then there may be other projects, such as water conservation projects, that do not receive these funds. CDWR will have to evaluate its own priorities and its statutory requirements, along with the State Water Board request, in establishing its priorities for grants. Since the State Water Board is not making the funding decisions, this request is not considered a project under CEQA.

Section 3 – Alternatives

The project alternatives are the current proposed Policy, the proposed Policy that was prepared for consideration at the March 18, 2008 board meeting, and the no project alternative. The current proposal was discussed previously. This section will explain the other two alternatives.

3-A: Proposal Prepared for Consideration at the March 18, 2008 State Water Board Meeting

Before the development of the current proposed Policy, staff had worked on an earlier version. A draft version was presented at a State Water Board workshop on October 2, 2007. The State Water Board received comments on this draft and staff made revisions to the proposed Policy. The revised Policy was released for public comment on the revisions, and the Water Board received another set of written public comments.

The policy that was proposed for consideration at the March 18, 2008 State Water Board meeting, included several components. In summary, these are:

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- **Salt Management Plans:** The proposal required the Regional Water Boards to prepare implementation plans for salts, including nitrates, for those groundwater basins that violate, or threaten to violate, water quality objectives.
- **Interim Irrigation Requirements:** In the interim, while the salt management plans are being developed, the proposal required the monthly average concentration of total dissolved solids for recycled water used for irrigation to not exceed the concentration of the source water supply, plus 550 mg/l; it required water recyclers to implement nutrient management plans, when the nitrogen concentration in the recycled water is more than 3 mg/l; and it required Regional Water Boards to defer groundwater monitoring until the applicable salt management plan is approved, except for certain specified circumstances.
- **Narrative Toxicity Objectives:** The proposal included some procedures for interpreting narrative objectives for toxicity.
- **Groundwater Recharge Reuse Projects:** The proposal allowed consideration of attenuation in groundwater and required consideration of potential changes in groundwater geochemistry.
- **Anti-degradation:** The proposal stated that Water Recycling Projects that comply with the Policy shall be considered to have complied with the Anti-degradation Policy.
- **Ongoing Responsibility:** The proposal stated that water recyclers shall be responsible for any past or continuing discharge that has caused groundwater constituent concentrations to exceed water quality objectives, even if these objectives are new or more stringent.
- **Coordination with CDPH -** The proposal required Regional Water Boards to implement CDPH recommendations or follow the dispute resolution procedures in the 1996 "Memorandum of Agreement between the Department of Health Services and the State Water Resources Control Board on the Use of Reclaimed Water.

The proposal was criticized in comment letters from environmental organizations and recycled water producers. Principal complaints about the proposal from environmental interests were that the proposal would not ensure compliance with water quality objectives, that the anti-degradation provisions would weaken water quality protections, and that the proposal failed to consider constituents of emerging concern. Water recyclers stated that the proposal would not achieve the objective of promoting the use of recycled water.

3-B: No Project Alternative

Under the "No Project Alternative, the State Water Board would not adopt a Recycled Water Policy. It does not have a legal mandate to do so.

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The Legislature, however, recently passed legislation (Senate Bill 1391, 2008, Padilla) that would have required the State Water Board to adopt a Recycled Water Policy. This bill was vetoed by the Governor, who stated in his veto message that the bill was unnecessary because the State Water Board is already working on a Recycled Water Policy. Hence, the State Water Board has received direction from the Governor to adopt a Recycled Water Policy.

Under the “no project” alternative, water recyclers would continue to face uncertainty as to what requirements would be placed on new recycled water projects. Some of this uncertainty would be reduced when the State Water Board adopts a General Permit for Recycled Water Irrigation Use as required by Assembly Bill 1481 (De La Torre, Chapter 535, Statutes of 2007). State Water Board staff are currently developing this general permit.

3-C: Selected Alternative

The recommendation is to adopt the current proposed Recycled Water Policy. Given the criticisms of the previous proposal, it was considered preferable to revise that proposal to address the expressed concerns. Although the General Permit for Recycled Water Irrigation Use is expected to alleviate some of the current regulatory uncertainty, the current proposed Recycled Water Policy will provide a more comprehensive solution to the water quality issues related to water recycling.

APPENDIX

Environmental Checklist

1. AESTHETICS

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☒ | ☐ |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | ☐ | ☐ | ☒ | ☐ |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | ☐ | ☐ | ☒ | ☐ |
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☐ | ☒ |

- a. The proposed Policy may encourage the development of more recycled water projects. A new recycled water facility may improve or adversely affect a scenic vista. The construction of any new facility with the potential to affect aesthetics would be subject to CEQA on an individual case-by-case basis, and potential impacts to scenic vistas would be evaluated at that time.
- b. Recycled water may be used for landscape irrigation, including irrigation of landscape within a state scenic highway. Irrigation of a salt-sensitive tree with certain recycled water could damage the tree. This potential must be evaluated before initiating the irrigation, as specified in the proposed Policy, which requires consideration of unusual circumstances. In addition, the proposed Policy requires irrigators to use fertilizers appropriately, after taking into account nutrient levels in the recycled water. The potential impact to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway is less than significant.
- c. A new recycled water facility subject to the proposed Policy could affect the existing visual character or quality of a site and its surroundings. Any potential effect is speculative but would be subject to CEQA on an individual case-by-case basis, and potential impacts to scenic vistas would be evaluated at that time.
- d. The increased use of recycled water will not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

2. **AGRICULTURAL 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 (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping & Monitoring Program of the California Resources Agency, to non-agricultural uses? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use? | ☐ | ☐ | ☒ | ☐ |
- a. The proposed policy is not expected to convert farmland to non-agricultural uses.
- b. The proposed Policy is not expected to conflict with existing zoning for agricultural use or a Williamson Act contract.
- c. If not properly managed, salts in recycled water could cause a loss of soil productivity. Consequently, a grower may take agricultural land out of production and sell it for conversion to a non-agricultural use. It is expected, however, that growers will properly manage soil salinity and that this impact will be less than significant.

3. **AIR QUALITY/ CLIMATE CHANGE.** 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.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☐ | ☒ |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | ☐ | ☐ | ☐ | ☒ |
| c) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☒ | ☐ |

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) 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)?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
f) Contribute to climate change by causing the emission of additional greenhouse gasses?	☐	☐	☒	☐
a. Recycled water projects implemented in accordance with the proposed Policy are not expected to conflict with or obstruct implementation of the applicable air quality plan.				
b. Recycled water projects implemented in accordance with the proposed Policy are not expected to violate any air quality standard or contribute substantially to an existing or projected air quality violation.				
c. Recycled water projects implemented in accordance with the proposed Policy are generally not expected to expose sensitive receptors to substantial pollutant concentrations. However, in some limited situations sensitive receptors could be exposed to recycled water, in the form of spray, mist, or runoff of recycled water. The Water Recycling Criteria in the California Code of Regulations, Title 22 sections 60301-60355, includes requirements to protect outdoor eating areas, food handling facilities, drinking fountains, and employees. The potential for exposure of sensitive receptors to substantial pollutant concentrations is less than significant.				
d. The operation of facilities for producing and conveying recycled water may generate small amounts of criteria air pollutants, primarily hydrogen sulfides and oxides of nitrogen emitted from water treatment processes. The emissions, however, will not result in a cumulative considerable net increase of any criteria pollutant.				
e. Chlorine is frequently used as a disinfectant in the wastewater industry; residual chlorine odors could be considered objectionable by some people in the immediate vicinity of the point of use. The number of people potentially affected by chlorine-derived odors is expected to be insubstantial; therefore, the quality impact is expected to be less than significant.				
f. The operation of wastewater treatment facilities and the infrastructure necessary to convey recycled water (e.g., pumps, back-up systems, etc.) may generate greenhouse gasses (GHGs), including carbon dioxide and methane. While recycled water production, distribution and use contributes a small amount of GHG emissions, the proposed Policy would not affect the volume of existing GHG production, most of which occurs at the wastewater treatment facilities, not the point of use. However, a goal of the proposed Policy is to increase the use of recycled water. If this goal is achieved, it will lessen the demand for surface water supplies and the need to pump surface water over long distances. This pumping requires large amounts of energy, which in the				

state is generated primarily from natural gas, a fossil fuel. It is expected that this reduction will offset any energy use needed to produce and distribute recycled water. Therefore, the proposed project's contribution to climate change is expected to be less than significant.

4. BIOLOGICAL RESOURCES.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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 DFG or USFWS?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☒	☐

- a. Recycled water could potentially be used to develop land that is habitat for candidate, sensitive, or special status species. Predicting any potential impacts from such development would be speculative. However, any development would be analyzed under CEQA and subject to regional plans, policies and regulations.
- b. Recycled water could be used to develop land within a riparian habitat. However, predicting any potential impacts from such development would be speculative. Any development would be analyzed under CEQA and subject to regional plans, policies and regulations.
- c. It is unlikely that a consequence of the proposed Policy will be the discharge of dredge or fill material into a wetland. The proposed Policy's management practices will minimize any hydrologic impacts to less than significant levels.

- d. A recycled water irrigation site could be proposed to be located within a migratory corridor. See 4a. above for discussion of potential impacts.
- e. Recycled water projects implemented in accordance with the proposed Policy are not expected to conflict with local policies or ordinances.
- f. The proposed Policy does not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other local, regional, or state habitat conservation plan.

5. CULTURAL RESOURCES.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

	☐	☐	☐	☒
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

The implementation of the proposed Policy is not expected to directly impact cultural resources. This does not, however, preclude the possibility that cultural resources could be impacted by construction activities in response to this proposed Policy. Any future construction would be subject to CEQA on an individual case-by-case basis, and potential impacts to cultural resources would be evaluated at that time.

6. GEOLOGY and SOILS.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
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 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐

- a-d. The implementation of the proposed Policy is not expected to directly impact geologic or soils conditions. However, this does not preclude the possibility of geologic or soils conditions that could be impacted by construction activities in response to the proposed Policy. Any future construction would be subject to CEQA on an individual case-by-case basis, and potential impacts to geology and soils would be evaluated at that time.
- e. Application of recycled water to landscaped and recreational areas in excess of agronomic rates could alter some soil properties that influence the suitability of a site to be used for septic tanks or alternate wastewater disposal systems. To be eligible for the permit streamlining provisions of the proposed Policy, the proposed Policy requires the application of recycled water at agronomic rates that do not exceed infiltration rates or nutrient demands. To be eligible for the permit streamlining provisions under the proposed Policy, a water recycler must prepare an operations and maintenance plan that specifies the agronomic rates and describes a set of reasonably practicable measures to ensure compliance with these rates. These requirements in the proposed Policy will ensure that impacts to the soils of a site to be used for septic tanks or alternate wastewater disposal systems would be less than significant for recycled water irrigation projects.

7. HAZARDS and HAZARDOUS MATERIALS.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or to the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
a. A consequence of adoption of the proposed Policy may be the construction of more recycled water treatment facilities. These additional facilities may use chlorine gas or sodium hypochlorite for disinfection. Both of these materials are hazardous. Use of these materials, however, is subject to hazardous material regulations and inspection by local regulatory agencies. This impact is not expected to be significant.				
b.-h. The implementation of the proposed Policy is not expected to directly impact hazards and hazardous materials other than as discussed in the above paragraph.				

8. HYDROLOGY and WATER QUALITY.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
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)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site, including through alteration of the course of a stream or river, or substantially increase the rate or volume of surface runoff in a manner that would:	☐	☐	☒	☐
i) result in flooding on- or off-site	☐	☐	☒	☐
ii) create or contribute runoff water that would exceed the capacity of existing or planned stormwater discharge	☐	☐	☒	☐
iii) provide substantial additional sources of polluted runoff	☐	☐	☒	☐
iv) result in substantial erosion or siltation on-or off-site?	☐	☐	☒	☐
d) Otherwise substantially degrade water quality?	☐	☒	☐	☐
e) Place housing or other structures which would impede or re-direct flood flows within a 100-yr. flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
f) Would the change in the water volume and/or the pattern of seasonal flows in the affected watercourse result in:				
i) a significant cumulative reduction in the water supply downstream of the diversion?	☐	☐	☒	☐
ii) a significant reduction in water supply, either on an annual or seasonal basis, to senior water right holders downstream of the diversion?	☐	☐	☒	☐
iii) a significant reduction in the available aquatic habitat or riparian habitat for native species of plants and animals?	☐	☐	☒	☐
iv) a significant change in seasonal water temperatures due to changes in the patterns of water flow in the stream?	☐	☐	☒	☐
v) a substantial increase or threat from invasive, non-native plants and wildlife	☐	☐	☐	☒
g) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
h) 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?	☐	☐	☐	☒
i) Be subject to inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

- a. The intent of the proposed Policy is to ensure attainment of water quality objectives. The proposed Policy may increase the use of recycled water and, hence, the salt / nutrient loadings on groundwater basins. The proposed Policy, however, mitigates this effect by requiring the development of regional salt/nutrient management plans that would consider all sources of salts and nutrients and that would prescribe requirements for meeting groundwater quality objectives for all dischargers within a basin.
- b. If the proposed Policy results in an increased use of recycled water, this use may be a substitute for groundwater use. Hence, the proposed Policy may help prevent the reduction of groundwater supplies. Groundwater recharge reuse projects directly augment groundwater supplies.
- c. It is possible that a golf course or other landscape area whose construction is facilitated by the availability of recycled water could alter drainage patterns. Turf, however, is relatively permeable. Hence, it is unlikely that this type of facility would greatly increase runoff from the previous condition. Such a facility would be evaluated under CEQA at the time it is proposed. Hence, this potential impact is less than significant.
- d. See response to “a”.
- e. It is unlikely that the adoption of the proposed Policy would promote the construction of structures within areas that could be flooded.
- f. It is possible that the proposed Policy could encourage an agency to reduce the volume of wastewater it discharges to a stream, and to increase the volume of wastewater it recycles. This could affect downstream water users and the aquatic community in the stream. Before an agency can do this, however, it must obtain authorization to do so from the State Water Board, Division of Water Rights. This authorization is required to contain conditions established to protect downstream beneficial uses.
- g. It is unlikely that the adoption of the proposed Policy would promote the construction of structures that could impede or redirect flood flows.
- h. It is unlikely that the adoption of the proposed Policy would create a flood risk.
- i. The failure of recycled water distribution pipe could potentially saturate a hillside and create a mudflow. This potential, however, exists with any potable water pipe and would be considered in the engineering design and review process. This potential impact is less than significant.

9. LAND USE AND PLANNING.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
a. Implementation of the proposed Policy is not expected to physically divide and established community.				
b. Implementation of the proposed Policy is not expected to conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.				
c. Implementation of the proposed Policy is not expected to result in conflict with any applicable habitat conservation plan or natural community conservation plan.				

10. MINERAL RESOURCES.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Staff is not aware of any mineral resources that could be affected by the proposed Policy. Our lack of awareness, however, does not preclude the possibility of mineral resources that could be impacted by construction activities in response to this proposed Policy. Any such construction would be subject to CEQA on an individual case-by-case basis, and potential impacts to mineral resources would be evaluated at that time.

11. 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?	☐	☐	☒	☐
b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
a. In some circumstances, noises typical of irrigation systems (sprinkler heads, pumps, valves, water hammer) could expose some individuals in the immediate vicinity of the point of use to elevated noise levels. Projects are generally expected to be subject to local noise ordinance restrictions, therefore the impacts are expected to be less than significant.				
b. In extreme circumstances, it may be possible that water hammer induced vibrations could elevate ground borne vibration or noise levels for some individuals in the immediate vicinity of the point of use. Such ground borne vibration or noise levels are generally expected to be subject to local noise ordinance restrictions, therefore the impacts are expected to be less than significant.				
c. The implementation of the proposed Policy is not expected to result in a substantial permanent increase in ambient noise levels in the vicinity of a recycled water project.				
d. The implementation of the proposed Policy is not expected to result in a substantial temporary or periodic increase in ambient noise levels in the vicinity of a recycled water project.				
e. For a recycled water 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, the implementation of the proposed Policy is not expected to expose people residing in or working in a recycled water project area to excessive noise levels.				

- f. For a recycled water project within the vicinity of a private airstrip, the implementation of the proposed Policy is not expected to expose people residing in or working in the project area to excessive noise levels.

12. POPULATION AND HOUSING.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 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)? | ☐ | ☐ | ☒ | ☐ |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |

- a. An effect of the proposed Policy may be the production of more recycled water to address the state's limited water supply, which frequently does not meet existing demand. Some communities have limited water resources and must have additional water resources to allow for population growth. Using recycled water can be a strategy to obtain water resources necessary for growth. This strategy, however, has been used without the presence of a water recycling policy. Although the proposed Policy will standardize recycled water use requirements, it is not expected that the increase in recycled water use will result in growth substantially beyond what would occur in the absence of the proposed Policy.
- b. The proposed Policy is not expected displace substantial numbers of existing residences.
- c. The proposed Policy is not expected to displace substantial numbers of people.

13. PUBLIC SERVICES.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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:

a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Implementation of the proposed Policy is not expected to directly impact public services. This does not, however, preclude the possibility that public services could be impacted by construction activities in response to this proposed Policy. Any such construction activity would be subject to CEQA on an individual case-by-case basis, and potential impacts to public services would be evaluated at that time.

14. RECREATION.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

Implementation of the proposed Policy is not expected to directly impact recreational uses. This does not, however, preclude the possibility of recreational uses that could be impacted by construction activities in response to the proposed Policy. Any such construction would be subject to CEQA on an individual case-by-case basis, and potential impacts to recreational resources would be evaluated at that time.

15. TRANSPORTATION / CIRCULATION.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (<i>i.e.</i> , result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	☐	☐	☐	☒
b) Exceed, either individually or cumulatively, a level-of-service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (<i>e.g.</i> , sharp curves or dangerous intersections) or incompatible uses (<i>e.g.</i> , farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Result in inadequate parking capacity?	☐	☐	☐	☒
g) Conflict with adopted policies supporting alternative transportation (<i>e.g.</i> , bus turnouts, bicycle racks)?	☐	☐	☐	☒

Implementation of the proposed Policy is not expected to directly impact transportation uses or circulation patterns. This does not, however, preclude the possibility of transportation uses or circulation patterns being impacted by construction activities in response to the proposed Policy. Any such construction would be subject to CEQA on an individual case-by-case basis, and potential impacts to transportation/circulation would be evaluated at that time.

16. UTILITIES AND SERVICE SYSTEMS.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

The implementation of the proposed Policy is not expected to directly impact utilities and service systems.

- a. The implementation of the proposed Policy is not expected to result in exceedances of wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- b. The proposed Policy may facilitate an increased use of recycled water that could result in construction of more wastewater conveyance and treatment facilities. Any future construction would be subject to CEQA on an individual case-by-case basis, and potential impacts to utilities and service systems would be evaluated at that time.
- c. It is unlikely that implementation of the proposed Policy would create a need for significant construction of additional storm water drainage facilities. The need for construction of any additional storm water drainage facilities, for example, for an expanded wastewater treatment plant, would be less significant.
- d. The implementation of the proposed Policy is not expected to affect water supplies available to serve the project from existing entitlements and resources, or otherwise require new or expanded entitlements.
- e. Implementation of the proposed Policy is not expected to result in more wastewater being generated. Hence, it does not require a determination by a wastewater treatment provider regarding the availability of adequate treatment capacity.
- f. Implementation of the proposed Policy is not expected to require a determination of sufficient landfill capacity.
- g. The implementation of the proposed Policy is expected to comply with federal, state, and local statutes and regulations related to solid waste.

17. MANDATORY FINDINGS OF SIGNIFICANCE.

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?	☐	☒	☐	☐
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)	☐	☒	☐	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a. The intent of the proposed Policy is to increase the use of recycled water and to improve groundwater quality. Increasing the use of recycled water would reduce the demand on surface water and groundwater supplies, making more water available for fish and wildlife habitat. The development of the salt/nutrient management plans is a mitigation measure intended to address the existing degradation of groundwater supplies in the state due to salinization.

b - c. Irrigation with all types of water has the potential to cause an increase in salt and nutrient concentrations in groundwater over time. Without controls in place, in some cases this could result in loss of beneficial uses of the groundwater. The proposed Policy provides for the development of locally tailored salt/nutrient management plans throughout the state, which take into consideration all salt and nutrient inputs and provide for locally appropriate mitigation to preserve beneficial use. This provision of the proposed Policy effectively mitigates the potentially cumulative impact to water quality from irrigation.

Groundwater recharge projects also have the potential to contribute salts and nutrients and this potential cumulative impact is mitigated by the preparation of the local salt and nutrient management plans described above. Unlike irrigation projects, groundwater recharge projects intentionally place large quantities of water in aquifers either to serve as a barrier to seawater intrusion or for later recovery and use. Because of this, groundwater recharge projects could potentially have cumulative impacts on both water quality and public health.

However, the proposed Policy and existing law requires site specific review and permitting conditions for proposed groundwater recharge projects. These include

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requirements intended to prevent the recycled water project from changing the geochemistry of the aquifer or interfering with a contaminant plume. These provisions of the proposed Policy, coupled with existing law, effectively mitigate the potentially cumulative impacts to both groundwater quality and human health.

All waters have the potential to contain Constituents of Emerging Concern (CECs) in very low quantities. However, we do not have complete information to fully understand the effects on human health. The proposed Policy establishes a panel of scientist to provide advice to the State Water Board on what regulatory actions it should take for these constituents, given the current state of scientific knowledge. The proposed Policy mitigates this potential cumulative impact by requiring the State Water Board to take official action to follow through on the panel's recommendations.