CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

INITIAL STUDY

GENERAL WASTE DISCHARGE REQUIREMENTS FOR FRUIT AND VEGETABLE PACKING FACILITIES WITHIN THE CENTRAL VALLEY REGION

California Regional Water Quality Control Board
Central Valley Region
Fresno, California

27 August 2026

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GLOSSARY

Basin Plan ..... Water Quality Control Plan

BMPs ..... Best management practices

BOD ..... Biochemical oxygen demand

BPTC ..... Best practicable treatment and control

CARB ..... California Air Resource Control Board

CCR ..... California Code of Regulations

Central Valley Water Board ..... Central Valley Regional Water Quality Control Board

CEQA ..... California Environmental Quality Act, Public Resources Code section 21000 et seq.

CEQA Guidelines ..... CCR, title 14, section 15000 et seq.

CDFW ..... California Department of Fish and Wildlife

CFR. ..... Code of Federal Regulations

CV-SALTS ..... Central Valley Salinity Alternatives for Long-Term Sustainability

CWC ..... California Water Code

DO ..... Dissolved oxygen

EIR ..... Environmental Impact Report

ESA ..... Endangered Species Act

FDS ..... Fixed dissolved solids

FEMA ..... Federal Emergency Management Agency

GHGs ..... Greenhouse gases

LAA(s) ..... Land application area(s)

mgy ..... Million gallons [per year]

mg/L ..... Milligrams per liter

MND ..... Mitigated Negative Declaration

ND ..... Negative Declaration

pm ..... Particulate matter

R[O]WD ..... Report of Waste Discharge

RCRA.....Resource Conservation and Recovery Act

State Water Board.....State Water Resources Control Board

TCRs.....Tribal Cultural Resources

Title 22.....California Code of Regulations, Title 22

Title 23.....California Code of Regulations, Title 23

Title 27.....California Code of Regulations, Title 27

Unified Guidance.....Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance (USEPA, 2009)

US EPA.....United States Environmental Protection Agency

US FWS.....United States Fish and Wildlife Service

USGS.....United States Geological Service

WDRs.....Waste Discharge Requirements

WQO[s].....Water quality objective[s]

INTRODUCTION

The Central Valley Regional Water Quality Control Board (Central Valley Water Board or Board) has developed proposed waste discharge requirements for land application and disposal of wastewater and associated solids from fruit and vegetable packing facilities within the Central Valley region ("General Order" or "Project"). The California Environmental Quality Act (CEQA) (Pub. Res Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15000 et seq.) requires the Board, as lead agency, to conduct a review of potentially significant impacts to the environment that could foreseeably result from the adoption of the General Order. To this end, the Board has prepared this Initial Study to determine whether it should prepare a negative declaration (ND), mitigated negative declaration (MND), or environmental impact report (EIR) evaluating the proposed Project. (See Cal. Code Regs., tit. 14, §§ 15365, 15060-15065.)

Background

California's Central Valley is a major agricultural area, and numerous food processing facilities, including fruit and vegetable packing facilities, are present within the region. The discharge of food processing wastes to land is a common practice within the Central Valley region since the facilities that generate these wastes are generally located in rural areas not served by municipal sewer systems and land application is often the most cost-effective method for disposal. Reuse of wastewater for irrigation of crops or landscaping has additional beneficial uses by replacing otherwise potable water sources and providing low-cost organic soil amendments and fertilizers for crops. Land disposal of process wastewater and solids from fruit and vegetable packing facilities can create environmental risks to groundwater quality, create odors, and affect beneficial uses.

The Central Valley Water Board is the agency responsible for regulating water quality within the Central Valley region in accordance with the Porter-Cologne Water Quality Control Act (Wat. Code, div. 7). One of the Board's responsibilities is the issuance of waste discharge requirements (WDRs) orders (i.e., permits) that conditionally authorize discharges of waste to surface and ground waters of the state. WDRs orders prescribe prohibitions, limitations, and requirements for waste dischargers, which are intended to protect the beneficial uses of the waters of the state and prevent conditions of pollution and nuisance.

The proposed General Order is a WDRs order that, if adopted, will provide streamlined and consistent regulation of waste discharges to land from fruit and vegetable packing facilities within the Central Valley region. Discharges to land from these types of facilities share certain common characteristics. While the discharge volume can vary depending on the size of the facility or crop type, the facilities proposed for coverage under the General Order generally involve similar operations and, therefore, generate similar types of wastes such as rinse water, condensate, conveyance water, cooling water, and equipment wash water which requires similar types of treatment and/or

control measures (e.g., screening, aeration, settling, filtration, etc.). Consistent with the Water Code and the Central Valley Water Board's water quality control plans (i.e., Basin Plans), the proposed General Order contains requirements and limits intended to prevent or mitigate potential impacts as a result of the regulated discharges. The General Order would apply on a regionwide basis to all eligible facilities that have enrolled for coverage under the Order.

Purpose

The primary purposes of this Initial Study are to provide the Central Valley Water Board with information to use as a basis for deciding whether to prepare an EIR or ND for the Project and to enable the Board to modify the project as needed to mitigate potentially significant impacts that might result from the Project as initially proposed. Other purposes are discussed in California Code of Regulations, title 14, section 15063, subdivision (c).

Statutes Regulating the Proposed Project

The Water Code provides the legal authority for the Central Valley Water Board to issue the General Order. Relevant statutes include:

1. Water Code section 13260, which requires any person discharging waste, or proposing to discharge waste, that could affect the quality of waters of the state to file a report of waste discharge (ROWD) containing the information that may be required by the regional water board, and

2. Water Code section 13263, which requires the regional water board to prescribe waste discharge requirements (WDRs) that implement the applicable Basin Plan and regulate discharges of waste to prevent pollution, nuisance, and impairments to designated beneficial uses. Subdivision (i) conditionally authorizes the regional water boards to adopt general WDRs for categories of discharges or dischargers if determined that the discharges involve similar operations, types of wastes, and treatment standards and are appropriately regulated under general rather than individual requirements.

Public Review and Comment

This Initial Study is available for a 30-day public review period beginning 19 June 2026 and ending 20 July 2026. Public comments should be submitted **by 5:00 pm on 20 July 2026**.

Please email comments to centralvalleyfresno@waterboards.ca.gov and copy Katie.Carpenter@waterboards.ca.gov. In the subject line of the email please include **"Comments – Fruit and Vegetable Packing General Order Initial Study"** and address the email to Katie Carpenter. Written Comments may also be submitted to:

Katie Carpenter
Central Valley Regional Water Quality Control Board
1685 E Street, Fresno, CA 93706

Prior to the public review period, the Central Valley Water Board notified Native American Tribes of the opportunity to consult, identify, and address any potential adverse impacts to tribal resources of cultural, historical, and/or archaeological significance (TCRs). "A project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment" (Pub. Res. Code, § 21084.2). The Central Valley Water Board transmitted the consultation notice on 5 March 2026. No Tribes submitted a request to be consulted during preparation of the Initial Study.

PROJECT DESCRIPTION

The Central Valley Water Board regulates discharges of waste to surface and ground waters through the issuance of WDRs orders, which prescribe prohibitions, limitations, and requirements for dischargers of waste to waters of the state. (See Wat. Code, § 13263.) The proposed General Order would establish general WDRs regulating discharges to land of process wastewater and associated solids from fruit and vegetable packing facilities (e.g., facilities that pack citrus, grapes, cherries, stone fruit, raisins, tomatoes, carrots, potatoes, beans, onions, etc.) within the Central Valley region that:

- Discharge between 10,000 gallons and 180 million gallons of process wastewater to land annually; and

- Do not produce concentrated waste from dicing, cooking, crushing, juicing, canning, or dehydrating. *(Note: Raisin packing facilities that utilize an onsite mechanical dehydrator may be covered by the General Order if all waste from the dehydrating operation is handled and disposed of separately [i.e., sent to a regional wastewater treatment facility, or land applied separately under individual WDRs or a waiver]).*

The primary concerns associated with waste discharges to land from fruit and vegetable packing facilities are: (1) degradation of water quality; and (2) odors from the over

application of waste to land or upset of treatment and disposal systems. Typical waste constituents of concern (COCs) and their potential environmental effects are discussed below.

1. **Biochemical Oxygen Demand (BOD)**: A measurement of the concentration of biodegradable organic content in process wastewater that represents the amount of oxygen required by microorganisms while oxidizing the waste constituents under aerobic conditions. Excessive BOD loading can create malodorous conditions as well as anoxic conditions in soil mobilizing certain metals which may reach groundwater and affect beneficial uses.

2. **Nitrogen**: Nitrogen in process wastewater may come in with the product, or originate from chemicals used for sanitation purposes such as quaternary ammonium, source water, soil residue and fertilizers, as well as damaged or spilled commodities. Excessive application of nitrogen to land over time can cause groundwater degradation for nitrate and may affect the beneficial uses of drinking water.

3. **Salinity**: Salinity in process wastewater is made up of organic and inorganic constituents. Organic constituents typically break down in the soil. Inorganic salts including constituents such as calcium, chloride, magnesium, potassium, and sodium can be utilized by crops, absorbed to soils, or leach to groundwater. To differentiate between inorganic salts and dissolved organic constituents, fixed dissolved solids (FDS) is the best indicator of salinity in wastewater containing organics. The majority of FDS in process wastewater originates from the source water, and chemicals used in sanitation and disinfection processes. Excessive application of inorganic salts may degrade soils, cause groundwater degradation, and affect beneficial uses.

4. **Disinfection byproducts**: Disinfection byproducts (e.g., trihalomethanes or THMs) form in process wastewater when chlorine used as a disinfecting agent reacts with organic material in the wastewater. Generally, disinfection byproducts are not a significant concern for land application if applied at agronomic rates since they are attenuated in the soil column. However, shallow groundwater or high concentrations stored in unlined ponds may increase the potential to impact groundwater and affect beneficial uses.

Degradation of surface waters and groundwaters can be reduced to less than significant levels with implementation of best management practices (BMPs) to minimize the threat posed by these wastes (e.g., treatment, even application and spreading, sprinkler or drip application, etc.). Treatment and disposal systems may include collection sumps, settling tanks, wastewater ponds, and/or land application areas (LAAs). Facilities covered by the General Order may discharge process wastewater and/or solids to land only; discharge to regulated surface water bodies is prohibited. Discharges regulated under the General Order will be grouped into regulatory tiers based in part on wastewater management

practices and the volume of process wastewater discharged to land as outlined in Table 1 below:

Table 1. Tier Specifications

Tier Designation	Description
Exempt	Less than 10,000 gallons of process wastewater per year
Tier 1	10,000 to 1 million gallons of process wastewater per year (mgy) with no ponds
Tier 2a	10,000 to 12 mgy of process wastewater with lined ponds and/or just LAA
Tier 2b	10,000 to 12 mgy of process wastewater with unlined ponds
Tier 3	12 to 30 mgy of process wastewater
Tier 4	30 to 180 mgy of process wastewater

The General Order also contains loading and effluent limits for various wastewater constituents. Dischargers with ample acreage may rely on natural treatment processes that occur within the soil and are not required to provide extensive pretreatment. Dischargers with limited acreage may need to provide a higher level of treatment prior to discharge. In some cases, discharge to an unlined storage and/or disposal pond may be allowed; however, an assessment must be conducted by a California registered professional to demonstrate that it is protective of groundwater and sensitive receptors.

The General Order is intended to provide standardized regulation for discharges of fruit and vegetable process wastewater to land throughout the Central Valley region. The General Order is not intended for, and does not address, any specific site(s). For eligible facilities that are already regulated by WDRs issued by the Central Valley Water Board, adoption of the General Order would result in minimal-to-no changes to' existing operations and waste disposal processes. New or expanding facilities that would be eligible for coverage under the General Order will generally require local governmental approval (e.g., issuance of a conditional use permit or other authorization) and associated CEQA review prior to construction, expansion, and/or operation. These facilities will generally be located in existing agricultural areas that have been or are already being farmed with existing crops and infrastructure for transport and application of irrigation water. The General Order would not authorize or otherwise regulate construction activities associated with development of new or expanded facilities; nor would it authorize or regulate operational activities that are unrelated to the enrolled facilities' waste discharges to land.

To the extent that a facility is not eligible for coverage under the General Order, or additional requirements are determined to be necessary based on site-specific conditions, the Central Valley Water Board may issue individual WDRs in lieu of enrolling a facility under the General Order. Accordingly, this Initial Study evaluates

foreseeable potential impacts that may result from typical treatment and disposal of wastewater and solids associated with those facilities, as would be approved by the General Order.

ENVIRONMENTAL SETTING

Bioregions

California is geographically diverse with desert, coastal, alpine, riparian, and grassland areas. Diversity of geography, temperature, and moisture creates significant variation in biological resources. California is divided geographically into ten bioregions consisting of relatively large areas with geographically distinct assemblages of natural communities and species. Biodiversity of flora, fauna, and ecosystems that characterize an individual bioregion tend to be distinct from that of other bioregions. Figure 1 provides an overview of the various bioregions in California.

As shown in Figure 1 the Central Valley region covers several bioregions resulting in highly variable soil and geographic conditions. It is anticipated that most if not all fruit and vegetable packing facilities that will be regulated under the General Order will be located in existing agricultural areas already maximized for crop production including plowing or deep-ripping of soil, and installation of infrastructure for irrigation of crops.

Figure 1. Bioregions in California

The majority of fruit and vegetable packing facilities within the Central Valley region are located primarily within four of these bioregions: the Sacramento Valley, Bay/Delta, San Joaquin Valley, and Sierra bioregions. A brief description of these bioregions is provided below:

a. The Sacramento Valley Bioregion makes up the northern portion of California's Great Valley, extending south roughly from Redding in the north to the northern edge of the Sacramento-San Joaquin River Delta (or Delta) at the confluence of the Sacramento and American Rivers. The eastern boundary spans the northern third of the Sierra Nevada foothills. The bioregion is relatively flat, consisting of shallow basins, plains, terraces, alluvial fans, and scattered hills or buttes.

b. The Bay/Delta Bioregion extends from the Pacific Ocean to the Sacramento and San Joaquin Valley bioregions on the east. This bioregion is a vast and complex ecosystem and makes up the largest estuary of the West Coast, blending freshwater from California's Central Valley with saltwater from San Francisco Bay. The bioregion is relatively flat, consisting of costal terraces, marshes, plains, ridges, and marine habitats.

c. The San Joaquin Valley Bioregion is the heart of California's Great Central Valley and is the state's top agricultural region, producing a wide variety of fruits and vegetables in its fertile soil. The region is bordered by the Coast Ranges on the west and the southern two-thirds of the Sierra Bioregion on the east. The bioregion is relatively flat, consisting of shallow basins, plains, terraces, alluvial fans, and scattered hills or buttes.

d. The Sierra Bioregion is named for the Sierra Nevada mountain range and extends approximately 380 miles from the Feather River in the north to Tejon Pass in the Tehachapi mountains. The bioregion includes the headwaters of 24 river basins extending to the foothills on the west where it adjoins the Sacramento and San Joaquin Valley Bioregions and the base of the Sierra escarpment on the east. These watersheds generate much of California's water supply. The bioregion includes rolling grasslands, hills, alpine forests, and steep mountain ridges.

Other bioregions present to a limited extent within the Central Valley region include the Klamath/North Coast Bioregion, Modoc Bioregion, and a sliver of the Central Coast Bioregion. These Bioregions consist of volcanic plains, steep mountain ridges, and forests, which are generally not conducive for irrigated agriculture and are less likely to support fruit and vegetable packing facilities.

Hydrology

Most of California is within one hydrological region as defined by the United States Geological Survey (USGS), which is subsequently subdivided into 153 hydrological units or watersheds. This section provides a brief overview of the key hydrological elements in California and the Central Valley region.

The Central Valley region is the largest in California covering most of the central portion of the State extending from the Modoc Plateau in the north, the Sierra Mountains in the east, Tejon Pass in the south, and Coast Ranges and Sacramento Delta to the west. The Central Valley region encompasses three major hydrologic regions with several minor subregions resulting in diverse hydraulic and geologic conditions ranging from high-quality surface waters consisting primarily of “snow-melt” on the eastern edge of the Sierras to highly saline groundwater in the central portion of the Tulare Lake bed. Given that the General Order regulates discharges to numerous groundwater basins/sub-basins throughout the region, there is insufficient data to determine the quality of every potential receiving water. However, some will likely be considered “high quality waters” and some degradation is to be expected. The terms and conditions in the General Order are designed to minimize groundwater degradation and protect beneficial uses to the extent feasible.

The majority of precipitation in the State is concentrated in areas remote from most large urban centers and major agricultural areas. Much of the climatic variation results from global weather patterns, oceanic influences and the location and orientation of the mountains. As shown in Figure 2 most of the Central Valley region is primarily semiarid to arid.

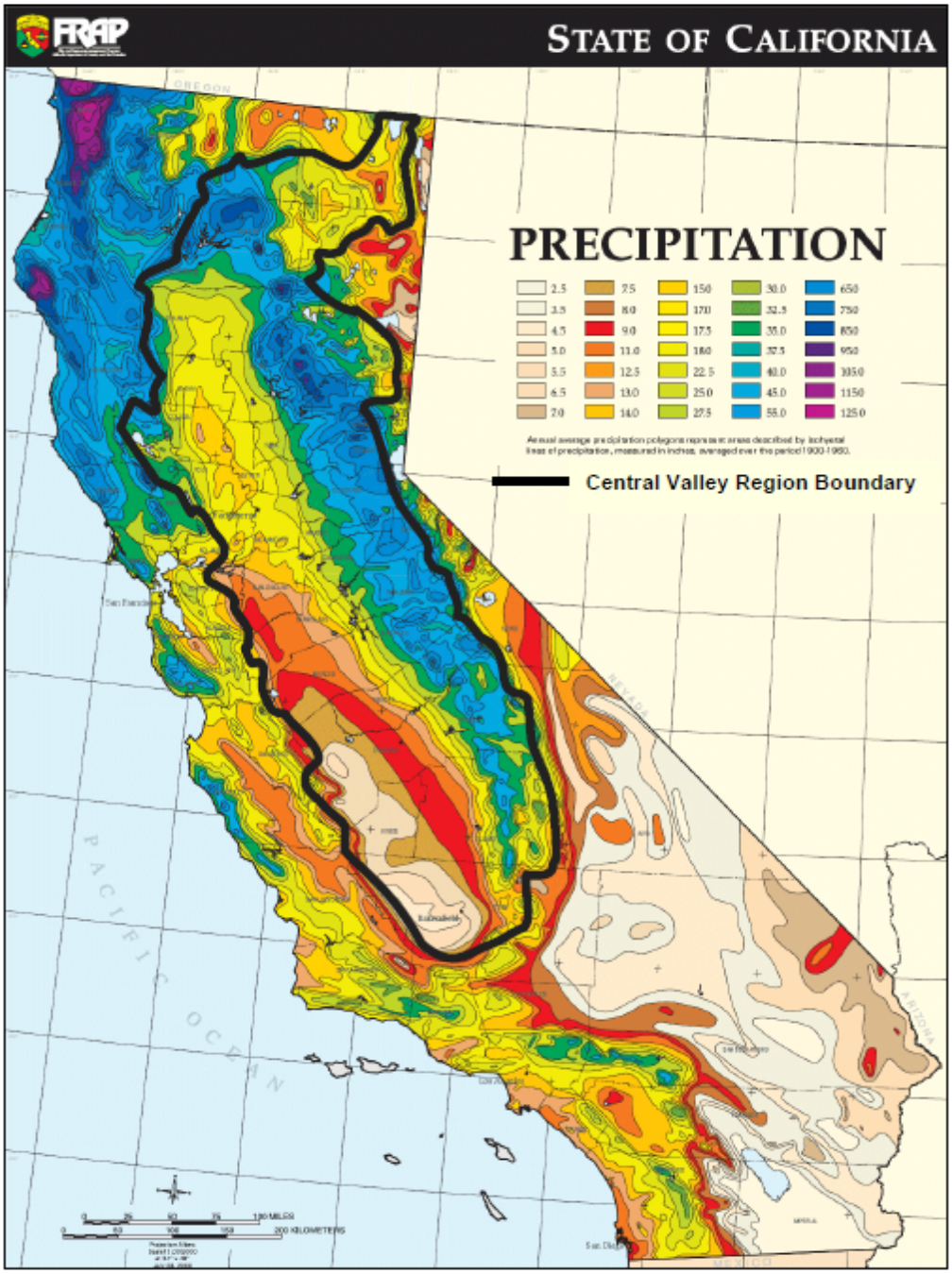

Figure 2. Average precipitation levels in California

Most of the precipitation in the State falls between November and April with typically dry summers except in mountain areas in the eastern and northern parts of the State. However, precipitation can vary greatly from year to year making surface water supplies unreliable. The relation between precipitation and evapotranspiration is a major factor in

determining water availability. If the annual precipitation exceeds the evapotranspiration there is a net water surplus. However, when the annual evapotranspiration exceeds precipitation there is a net water deficit. Water is available to recharge aquifers only when precipitation and snowmelt is greater than actual evapotranspiration. A net annual moisture deficit is generally present almost everywhere within the Central Valley region except the mountainous areas of northern and east-central California.

As mentioned above, hydrologists divide California into several watersheds. The regional water boards are primarily delineated by the boundaries of these watersheds as described in Water Code section 13200. The Central Valley Water Board includes the following watersheds.

Table 2. Hydrologic Watersheds Within the Central Valley Region

Hydrologic Watersheds	Description
Sacramento River	The Sacramento River watershed includes the entire drainage area of the Sacramento River, the largest river in California, and its tributaries. Groundwater in the northern half of the watershed is, for the most part, contained in volcanic rock aquifers. The southwestern half of the watershed is underlain by part of the Central Valley aquifer system. The remaining areas comprising portions of the southeastern and northern half of the watershed are underlain by fractured hard rock. Surface water and groundwater quality in the Sacramento River watershed is generally good although there are localized problems.
San Joaquin River	A portion of the Central Valley aquifer system underlies nearly the entire eastern half of the San Joaquin River watershed, while the western half is primarily underlain by fractured hard rock. Surface water and groundwater quality throughout the San Joaquin River watershed is generally good and usable for most urban and agricultural uses, although localized problems occur.

Hydrologic Watersheds	Description
Tulare Lake	The Tulare Lake watershed covers the southern half of the Central Valley, south of the San Joaquin River. A small area on southern end of the Tulare Lake watershed is underlain by a portion of the Central Valley aquifer system. The Tulare Lake Watershed is essentially a closed basin with no outlets under normal climatic conditions. The watershed is one of the most important agricultural areas in the world, with industries related to agricultural, packing, canning, and wine making prominent throughout the area. Surface water supplies are generally inadequate to support the area. Therefore, groundwater resources are being depleted to provide additional water to meet demands. Major rivers that drain the southern portion of the Sierra include the Kings, Kaweah, Tule, and Kern Rivers are generally of good quality. Additional surface water is also imported through the San Luis Canal/California Aqueduct System, Friant-Kern Canal and the Delta-Mendota Canal. However, with no outlet, salts from natural and imported water accumulates in soils and groundwater within the watershed making portions of it unusable for municipal or agricultural beneficial uses.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below could be potentially affected by the Project.

☒ Aesthetics
☒ Air Quality
☒ Cultural Resources
☒ Geology/Soils
☐ Hazards & Hazardous Materials
☐ Land Use/Planning
☒ Noise
☐ Public Services
☐ Transportation
☒ Utilities/Service Systems
☒ Mandatory Findings of Significance
☒ Agriculture and Forestry Resources
☒ Biological Resources
☒ Energy
☒ Greenhouse Gas Emissions
☒ Hydrology/Water Quality
☐ Mineral Resources
☐ Population/Housing
☐ Recreation
☒ Tribal Resources
☐ Wildfire

ENVIRONMENTAL CHECKLIST

The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) recommend that lead agencies use an Initial Study Checklist to determine the potential impacts of a proposed project on the physical environment. (See *id.*, § 15063.) The Initial Study Checklist provides questions concerning a comprehensive array of environmental issues potentially affected by the project. This section of the Initial Study incorporates that portion of the Environmental Checklist Form, contained in the CEQA Guidelines Appendix “G”. Impact questions and responses are included in both tabular and narrative forms.

There are four possible answers to the environment impacts to the Initial Study Checklist on the following pages. Each possible answer is explained below:

1) A “Potentially Significant Impact” answer is appropriate if there is enough relevant information and reasonable inferences from the information that a fair argument can be made to support a conclusion that a substantial, or potentially substantial, adverse change may occur to any of the physical conditions within the area affected by the project. When one or more “Potentially Significant Impact” entries are made, an Environmental Impact Report (EIR) is required.

2) A “Less Than Significant with Mitigation Incorporated” answer is appropriate where the applicant has agreed to incorporate a mitigation measure to reduce an impact from “Potentially Significant” to “Less Than Significant”. The lead agency must describe the mitigation measure(s) and briefly explain how they reduce the effect to less-than-significant level. For the purpose of this analysis, this response means that mitigation has been incorporated as one or more conditions or prohibitions in the proposed General Order.

3) A “Less Than Significant Impact” answer is appropriate if there is evidence that one or more environmental impacts may occur, but that impacts are determined to be less than significant. For the purpose of this analysis, this response means that the potential impacts are not significant even without mitigation measures incorporated into the General Order.

4) A “No Impact” answer is appropriate where it can be clearly seen that there is no potential to adversely affect the physical environment.

A brief explanation is provided for all answers except “No Impact”

I. Aesthetics

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, 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) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☐	☒

Discussion

a–c) **Less than significant.** The discharge of wastes and management practices regulated under the proposed General Order will have a less than significant impact on aesthetic resources, as the minor alteration of current practices are not aesthetically different from existing agricultural practices currently utilized in areas that would be regulated under the General Order. Facilities whose discharges could be regulated under the General Order may engage in activities within view of scenic highways; however, federal, state, and local regulations would prohibit construction within the highway right of way. Further, the local authorities will continue to have jurisdiction to establish appropriate locations and design standards for new construction or modifications to existing structures.

d) **No impact.** The General Order is intended as a regulatory mechanism to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities and will not foreseeably create sources of substantial light or glare. Further, while some facilities may operate at night requiring outdoor lighting, regulations regarding use of outdoor lighting would fall within the scope of the local authority and land use permits issued for these types of facilities and is beyond the scope of this analysis.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will result in a less than significant impact to aesthetic resources. Expansion of existing facilities and construction of new facilities after adoption of the General Order will be subject to local agency approvals, permits, and potential site-specific CEQA review. The local authority will continue to have jurisdiction to establish appropriate locations and design standards for new construction or modifications to existing structures on a site-specific basis. The adoption of the General Order will not affect those requirements.

II. Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant, 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. In determining whether impacts to forest resources, including timberland, are significant, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Control Board.

Issues (and Supporting Information Sources):	***Potentially Significant Impact***	***Less than Significant with Mitigation Incorporated***	***Less-than-Significant Impact***	***No Impact***
II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☒	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☒	☐
e) Involve other changes, 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?	☐	☐	☒	☐

Discussion

a–e) **Less than significant.** Because packing facilities depend on agricultural commodities, dischargers covered under the General Order will be more likely to preserve farmland rather than convert it to another use. Construction related to new or expanding facilities after adoption of the General Order could occur on a wide variety of land use types throughout the region. Because site-specific projects have not been determined, this evaluation cannot address potential site-specific impacts related to conversion of prime farmland, forest lands, or Williamson Act contracts. However, such changes would require zoning modifications or additional entitlements which would require discretionary action by local land use authorities and preparation of a site-specific environmental analysis, that is beyond the scope of this analysis.

The General Order is intended as a regulatory mechanism to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities. At existing facilities the General Order will not change zoning or land use designations but may indirectly affect conversion of farmland to other uses (i.e., construction of berms, pipelines, access roads, and storage/treatment areas) to comply with General Order requirements. Most of these changes are expected to be relatively minor and/or transitory. The potential impacts of the General Order on agricultural land use and forestry resources are considered less than significant.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact on zoning or designation of agricultural and forestry resources. The local authority will continue to have jurisdiction on land use and zoning for new construction or modifications to existing structures on a site-specific basis. The adoption of the General Order will not affect those requirements.

III. Air Quality

Where available, the significance criteria established by the applicable air quality management district 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*
III. AIR QUALITY. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

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

- California Clean Air Act requirements – California Health and Safety Code section 39607(e) requires the California Air Resources Control Board (CARB) to establish potential air quality impacts and periodically review and designate areas of California. The CARB makes area designations for attainment, nonattainment, and unclassified for ten pollutants including ozone, suspended particulate matter (PM10 and PM2.5), carbon monoxide, nitrogen dioxide, sulfur dioxide, sulfates, lead, hydrogen sulfide, and visibility reducing particles.

- Federal Clean Air Act Requirements – the CARB and US Environmental Protection Agency (US EPA) designates areas for each pollutant for which there is a national ambient air quality standard (e.g., ozone 8-hour standard, PM10, PM2.5, carbon monoxide, nitrogen dioxide, and sulfur dioxide).

- Local Air Quality Management/Air Pollution Control – The State of California is divided into Air Pollution Control Districts and Air Quality Management Districts, referred to herein as air districts. Air districts are local county or regional governing authorities that have the primary responsibility for controlling air pollution from stationary sources.

a–c) **Less than Significant.** The General Order will not directly result in the generation of potential air quality impacts. However, emissions generating equipment, such as pumps, boilers, refrigeration, and loading equipment powered by fossil fuels or electrical generators could be employed by facilities regulated under the General Order. Packing facilities are required to meet local agency ordinances and regulations related to air quality impacts and the General Order would not affect these requirements. Where such equipment could create impacts to air quality, permits or operating requirements would be imposed through one of the regulatory programs summarized above.

d) **Less than significant.** Management of process wastewater and solids from packing facilities regulated under the General Order could create objectionable odors. These wastes typically contain high levels of organic material and water to foster aerobic and anaerobic decay which can create objectionable odors. However, the use of common BMPs developed by the food processing industry has been effective in controlling and preventing objectionable odors. The General Order includes the following conditions intended to reduce the potential for nuisance odor conditions to less than significant levels:

1. Requires the discharger maintain dissolved oxygen (DO) levels above 1.0 milligram per liter (mg/L) in any wastewater storage or percolation pond.

2. Requires application of all process wastewater and solids be at agronomic rates consistent with the water and nutrient needs of the crop.

3. Requires all water be applied and distributed with reasonable uniformity on adequate acreage and infiltrate completely within 48 hours following application to avoid nuisance conditions.

4. Requires solids applied to the land application areas be incorporated into the soil within 72 hours following application.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact on air quality. New or expanding facilities constructed after adoption of the General Order will be subject to local agency approvals, permits, and possibly a project-level CEQA review, at which time potential adverse air quality impacts must be evaluated and appropriate mitigation measures implemented for both construction and operation. Additionally, air pollutant sources within packing facilities potentially regulated under the General Order will be regulated by the local air districts to ensure compliance with air quality standards. For nuisance odors, the General Order includes conditions that will reduce potential odor impacts to less than significant levels.

IV. Biological Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
IV. BIOLOGICAL RESOURCES. 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 California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
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 CDFW or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands (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 wildlife 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?	☐	☐	☒	☐

Discussion

a-b) **Less than significant.** The General Order will not directly cause potential impacts to biological resources. However, facilities potentially regulated under the General Order may be located in a variety of settings, including areas with sensitive habitats. Depending on the nature of the facility and operational activities, the potential impacts to biological resources could vary based on site-specific conditions, which is beyond the scope of this analysis. The General Order does not directly permit habitat modification or other forms of construction. Expansion of existing facilities or creation and operation of new facilities and land application areas after adoption of the General Order will be subject to local agency approvals, permits, and possibly a project level CEQA review, at which time potential adverse impacts to wildlife, biological resources, and sensitive habitats would be evaluated.

c) **No impact.** The General Order specifically prohibits discharges to wetlands and surface waters. Therefore, adoption and implementation of the General Order would not result in impacts to federally protected wetlands.

d–f) **Less than significant.** See response to item (a-b) above. Further the General Order is intended as a regulatory mechanism to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities and will not substantially interfere with movement or migration of fish and wildlife.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact on biological resources and will not interfere with the movement or migration of fish and wildlife. Local authorities will continue to have jurisdiction to establish appropriate locations and design standards for new construction or modifications to existing structures on a site-specific basis. The adoption of the General Order will not affect those requirements.

V. Cultural Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Directly or indirectly destroy a unique paleontological resource or unique geological feature?	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Discussion

a-d) **Less than significant.** The General Order will not directly authorize or otherwise foreseeably result in potential impacts to cultural, archeological, or paleontological resources. However, activities at facilities that could potentially be regulated under the General Order may result in site disturbances that could, under some circumstances, disturb or result in changes to cultural, historical, or paleontological resources. Facilities whose discharges could be regulated under the General Order may be located in a variety of settings, including cultural and historically sensitive areas. Construction-related activities at existing facilities would generally be minor and the potential for unknown cultural, historical, and paleontological resources to be encountered is unlikely in areas that have already been disturbed. Locations for new facilities are unknown at this time, so it is not possible to evaluate the potential for impacts to cultural, historical, or paleontological resources. However, packing facilities are typically located in active farming areas close to the product supply. Construction associated with expansion of existing facilities or new facilities after the General Order is adopted will be subject to local agency approvals, permits, and possibly a project level CEQA review, at which time potential adverse impacts to cultural, historical, and paleontological resources would be evaluated and appropriate mitigation implemented in accordance with federal, state, and local requirements as follows:

1. Compliance with Pub. Resource Code section 21159 to ensure implementation of necessary site-specific actions to avoid, minimize, and mitigate potential impacts to significant historical, archaeological, and paleontological resources or unique geological features.

2. Compliance with CEQA requirements for tribal consultation in accordance with Senate Bill and Government Code section 65352 including detailed search of records and associated databases to identify and minimize potential impacts to tribal cultural resources prior to initiating construction.

3. Compliance with Health and Safety Code section 7050.5 and Pub. Resource Code section 5097.98 upon discovery of human remains during construction.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact on cultural, historical, and paleontological resources. Expansion of existing facilities and construction of new facilities after adoption of the General Order will be subject to local agency approvals, permits, and potential project level CEQA review. The local authority will continue to have jurisdiction to establish appropriate locations and design standards for new construction or modifications to existing structures on a site-specific basis. The adoption of the General Order will not affect those requirements.

VI. Energy

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

a-b) **Less than significant.** The General Order will not directly impact energy resources. However, compliance with General Order requirements will result in the consumption of energy related to transportation, treatment, and disposal or reuse of process wastewater and solids. Energy for electrical equipment including lighting, pumps, ventilation, and vehicles, as well as climate controls (e.g., refrigeration and heating) are typically necessary for proper operation of packing facilities. Because users pay for energy (i.e., electricity, natural gas, and petroleum) based on usage, they are incentivized to prevent wasteful, inefficient, or unnecessary consumption of energy. Further the adoption and implementation of the General Order would not conflict with or obstruct state or local plans for use of renewable or energy efficiency. Therefore, impacts would be less than significant.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact on energy resources and would not result in the wasteful, inefficient, or unnecessary consumption of energy. In addition, adoption and implementation of the General Order will not conflict or obstruct state or local plans for use of renewable energy or energy efficiency.

VII. Geology/Soils

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
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 soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐

Issues (and Supporting Information Sources):	***Potentially Significant Impact***	***Less than Significant with Mitigation Incorporated***	***Less-than-Significant Impact***	***No Impact***
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☒	☐

Discussion

a) **Less than significant impact.** The General Order is intended as a regulatory mechanism to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities. The adoption and implementation of the General Order will not have a significant adverse effect associated with seismic related ground failures, ruptures, or landslides. However, facilities potentially regulated under the General Order may be subject to seismic related impacts. There is a wide variation in the state relative to seismic risk with respect to faulting, ground shaking, seismically related ground failure, and liquefaction. Expansion of existing facilities or new facilities constructed after the General Order is adopted will be subject to local agency use permits and an associated project level CEQA review at which time potential adverse impacts must be evaluated and appropriate mitigation measures implemented. At a minimum these projects would be subject to local building codes developed to reduce the risk of loss, injury, or death to a less than significant level.

b) **Less than significant.** The General Order in itself will not have the potential to cause soil erosion. However, facilities that could be regulated under the General Order may apply process wastewater and solids to land that could potentially cause soil erosion resulting from runoff or ponding. The General Order includes the following specific conditions to prevent erosion and loss of topsoil within areas used for land application of wastes and reduce potential impacts to less than significant levels:

1. Prohibiting the application of process wastewater and solids to the land application areas during significant precipitation events or when soils are saturated.

2. Requiring crops to be grown within the land application areas to stabilize topsoil and reduce the potential for erosion.

3. Requiring dischargers to ensure that all water is applied and distributed with reasonable uniformity on adequate acreage to preclude the creation of nuisance conditions including erosion channels and ponding.

4. Requiring process wastewater used for dust control be applied at the minimum hydraulic loading rates necessary to meet the intended purpose and not cause ponding or runoff from the area intended for dust suppression.

Expanding facilities or new facilities constructed after adoption of the General Order may involve excavation, grading, and/or soil disturbances. However, these activities are outside the scope of this analysis. Local authorities typically have established protocols for construction projects to minimize erosion, sedimentation, and storm water runoff. Such projects are subject to local agency approvals, permits, and possibly a project-level CEQA review.

c–e) **Less than significant impact.** See response to item (a) above.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact from seismic related ground failures, ruptures, landslides, or liquefaction. For new or expanding facilities local authorities will continue to have jurisdiction to establish appropriate locations and design standards for new construction or modifications to existing structures on a site-specific basis. The adoption of the General Order will not affect those requirements. Potential adverse impacts from erosion and loss of topsoil in areas used for land application of process wastewater and solids will be reduced to less than significant levels with the conditions incorporated as part of the adoption and implementation of the General Order.

VIII. Greenhouse Gas Emissions

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

Global climate change is a change in average weather conditions, which can be measured by wind patterns, storms, precipitation, and temperature. It is exacerbated by greenhouse gases, which trap heat in the atmosphere. Greenhouse gases (GHGs) include carbon dioxide, methane, and nitrous oxide which can be emitted by natural processes as well as human activities. GHGs accumulate in the atmosphere and regulate the Earth's temperature, some accumulation is natural and necessary, however too much can increase temperatures to undesirable levels.

Climate change is a global problem, and GHGs are global pollutants, unlike criteria air pollutants (e.g., ozone and particulate matter), which are primarily pollutants of regional and local concern. No single emitter of GHGs is large enough to trigger global climate change on its own, rather, climate change is the result of numerous individual contributions from countless sources. Therefore, GHG impacts are inherently cumulative. Based on the CEQA Guidelines 2018 update, an impact pertaining to climate change is considered significant if it would generate GHG emissions either directly or indirectly, that may have a significant impact on the environment or conflict with any applicable plan adopted for the purpose of reducing GHGs. In accordance with the CEQA Guidelines and scientific consensus regarding the cumulative nature of GHG emissions, this analysis includes a cumulative rather than a project level evaluation.

a) **Less than significant.** The General Order will not directly generate GHGs. However, the application of organic waste as allowed under the General Order will result in the generation of some GHG emissions as the organic matter degrades. The primary GHGs of concern from the degradation of organic matter are carbon dioxide and methane. The amount of GHGs produced is variable and dependent on operational and maintenance practices at the facility; however, GHG emissions from land application of process wastewater and solids at fruit and vegetable packing facilities are not expected to differ significantly from normal farming practices. In addition, the General Order includes requirements such as ensuring infiltration of wastewater within 48 hours and requires that any associated solids applied to the land application areas be incorporated into the soil within 72 hours reducing the release of GHGs into the atmosphere. Thus, reducing potential impacts from GHG emissions both individually and cumulatively to less than significant.

   Facility operations including transporting product and waste materials (using gas or electrically powered vehicles) as well as power for processing equipment and pumps will also contribute to the generation of GHGs. The amount of GHGs produced will vary depending on site-specific operations, which is beyond the scope of this analysis. Packing facilities are required to meet local agency ordinances and regulations related to GHG emissions, and the General Order would not affect those requirements. Where such equipment could create impacts related to GHG emissions, permits or operating requirements would be imposed. Further, GHG emissions associated with construction activities and use of heavy equipment for expansion of existing facilities or construction of new facilities after

adoption of the General Order will be subject to local agency use permits and an associated project level CEQA review.

b) **Less than significant.** The General Order will not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing emissions of GHGs. The purpose of the General Order is to regulate waste discharges to land from fruit and vegetable packing facilities in a manner that protects water quality and does not include provisions that would alter GHGs regulations or ordinances. Impacts would be less than significant.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact on GHG emissions, both individually and collectively. In addition, adoption and implementation of the General Order will not conflict with any applicable plans, policies, or regulations adopted to reduce emissions of GHGs. New or expanding facilities that are constructed after adoption of the General Order are subject to local agency approvals, permits, and possibly a project-level CEQA review, at which time potential adverse impacts associated with GHGs would be evaluated and appropriate mitigation measures implemented for both construction and operational related impacts. Additionally, pollutant sources (i.e., vehicles and processing equipment, etc.) will be regulated by the local air districts to ensure compliance with air quality standards.

IX. Hazards & Hazardous Materials

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
IX. HAZARDS AND HAZARDOUS MATERIALS. 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 one-quarter 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 Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

Discussion

a-e) **No impact.** The General Order will not directly result in potential impacts associated with hazards and hazardous materials. Some facilities regulated under the General Order may store and use some hazardous materials. However, the General Order does not regulate the storage, transport, or use of these materials and prohibits on-site discharge or disposal of any hazardous materials. Further, adoption and implementation of the General Order will not impair or physically interfere with adopted emergency response and evacuation plans. Construction related hazards associated with expansion of existing facilities or new facilities after the General Order is adopted will be subject to local agency approvals, permits, and possibly a project level CEQA review. Siting of facilities potentially regulated by the General Order near a hazardous material site is outside the scope of this analysis since such determinations are under local planning and building departments jurisdiction.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have no impact in relation to the storage and disposal of hazardous materials. Further, the General Order does not authorize or otherwise regulate the generation, storage, transport, or disposal of hazardous materials nor will it impair or interfere with emergency response and evacuation plans. Expansion of existing facilities and construction of new facilities after adoption of the General Order are subject to local agency approvals, permits, and potential CEQA review at which point potential construction and sitting hazards will be evaluated and mitigation measures identified and addressed. The adoption and implementation of the General Order will not affect those requirements.

X. Hydrology/Water Quality

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion, siltation, or increase surface runoff contributing to on- or off-site flooding?	☐	☐	☒	☐
d) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
e) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
f) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

a) **Less than significant.** Adoption and implementation of the General Order will not violate any water quality standards or waste discharge requirements. Compliance with the Basin Plans and other applicable State and regional water board policies is required as part of General Order enrollment. Facilities seeking coverage under the General Order must comply with requirements for treatment and disposal of process wastewater and solids to protect water quality. Facilities that cannot meet General Order requirements will not be enrolled and may be required to seek coverage under individual WDRs. Occasional violations or accidental discharges may occur if the treatment and discharge systems are not properly managed; however, monitoring requirements imposed as part of General Order enrollment will identify such circumstances so that they can be corrected.

Adoption and implementation of the General Order will not substantially degrade surface or groundwater quality. While process wastewater and solids contain constituents (i.e., salinity, organics, nutrients, etc.) that could degrade water quality proper management of the discharge including routine monitoring and reporting requirements as well as compliance with the salt and nitrate control programs as required by the General Order would reduce potential impacts to less than significant levels.

b) **Less than significant.** The General Order will not directly result in potential impacts to groundwater supplies or groundwater recharge, nor would it interfere with any sustainable groundwater management plans. In most cases source water for facility operations will come from groundwater, thus potentially affecting groundwater supplies. However, reuse of wastewater for crop irrigation or percolation of wastewater into subsurface soils as implemented under the General Order will off-set potential groundwater losses reducing potential impacts to groundwater supplies and recharge to less than significant levels.

c–e) **Less than significant.** The General Order will not directly increase impervious surfaces, alter drainage patterns, or increase storm water runoff. However, facilities that could potentially be regulated under the General Order may intercept storm water that falls within the facility footprint which may be contained in on-site ponds or combined with wastewater and sent to the LAAs. The use of ponds and other means for storage and reuse of storm water runoff will reduce peak storm water discharges. The General Order includes requirements to prevent overflow from ponds and runoff from the land application areas. In addition, the General Order restricts application of process wastewater during significant precipitation events or when soils are saturated and requires controls to prevent runoff, thus reducing potential impacts from storm water runoff to less than significant levels. Expansion of existing facilities or construction of new facilities after the General Order is adopted will be subject to local agency use permits and an associated project level CEQA review, at which time potential adverse impacts to drainage patterns must be evaluated and appropriate mitigation measures implemented.

At a minimum, these projects will be subject to local building codes and storm water controls and permits.

f) **No impact.** Adoption and implementation of the General Order will not conflict with or obstruct implementation of any water quality control plan or sustainable groundwater management plan.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact associated with hydrologic changes and water quality. Compliance with General Order requirements will ensure the discharge of process wastewater and solids to land will be managed in a manner to protect water quality and reduce potential impacts to less than significant levels. In addition, the General Order will not conflict with or obstruct implementation of any water quality control plan or sustainable groundwater management Plan. Further expansion of existing facilities and construction of new facilities after adoption of the General Order will be subject to local agency approvals, permits, and potential CEQA review. The local authority will continue to have jurisdiction to establish appropriate locations and design standards for new construction or modifications to existing structures on a site-specific basis. The adoption and implementation of the General Order will not affect those requirements.

XI. Land Use/Planning

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

a-c) **No impact.** The General Order will not conflict with any land use plans or physically divide an established community. The General Order is intended to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities. Facilities that would potentially be regulated under the General Order are required to comply with applicable land use plans, policies, and regulations by local planning authorities including habitat conservation areas. Local authorities will continue to have jurisdiction on land use and zoning for new construction or modifications to existing structures on a site-specific basis, at which time potential impacts to land use and planning would be evaluated. The adoption and implementation of the General Order will not affect those requirements.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project would have no impact on land use and planning.

XII. Mineral Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Discussion

a-b) **No impact.** The General Order will not directly impact the availability of known mineral resources or minerals of statewide importance. The General Order is intended to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities typically located in agricultural areas. No impact to known or important mineral resources is expected. Local authorities will continue to have jurisdiction on land use and zoning for new construction or modifications to existing structures on a site-specific basis, at which time potential impacts to mineral resources would be evaluated. The adoption and implementation of the General Order will not affect those requirements.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project is expected to have no impact on the availability of known or important mineral resources.

XIII. Noise

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XIII.NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Discussion

a-c) **Less than significant.** The General Order will not directly cause potential noise-related impacts or ground-borne vibrations. However, Facilities that could potentially be regulated under the General Order may cause some impacts for noise or vibrations during operation or construction. The amount of noise or vibrations produced will vary depending on site-specific operations, which is beyond the scope of this analysis. Packing facilities are required to meet local agency ordinances and regulations related to noise impacts and the General Order would not affect those requirements. Where operations could create significant noise impacts, permits or operating requirements would be imposed. Noise impacts related to expansion of existing facilities or construction of new facilities after adoption of the General Order will be subject to local agency use permits and an associated project level CEQA review, at which time potential mitigation measures would be identified and addressed. The adoption and implementation of the General Order will not affect those requirements.

Construction of facilities potentially regulated by the General Order within an airport land use plan or in the vicinity of a private airstrip is outside the scope of this analysis since such determinations would be handled by local planning and building authorities.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project would result in less than significant impacts from noise and ground-borne vibrations. Expansion of existing facilities and construction of new facilities after adoption of the General Order will be subject to local agency approvals, permits, and potential site-specific CEQA review. The local authority will continue to have jurisdiction to establish appropriate standards for noise-related impacts associated with new construction or modifications to existing structures and equipment on a site-specific basis. The adoption of the General Order will not affect those requirements.

XIV. Population/Housing

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a-b) **No impact.** A Project that removes an obstacle to growth is generally considered growth-inducing. The General Order is intended as a regulatory mechanism to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities. Facilities potentially regulated by the General Order are generally located in rural agricultural areas. Adoption and implementation of the General Order will not increase the need for fruit and vegetable packing facilities and would, therefore, not be considered growth-inducing, or leading to an increased need for population and housing.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project would have no substantial impact either directly or indirectly on the need for increased population and housing.

XV. Public Services

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Discussion

a) **No impact.** The General Order is intended as a regulatory mechanism to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities. The General Order will not add new residents, change land uses, or impede public services. Therefore, no additional public services would be required as a result of the adoption or implementation of the General Order.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will not have a substantial impact either directly or indirectly on public services or result in the need for additional fire protection, police protection, schools, parks, or other public services.

XVI. Recreation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XVI. RECREATION. 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 which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

a) **No impact.** The General Order is intended as a regulatory mechanism to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities. Facilities potentially regulated by the General Order are predominantly in rural agricultural areas and generally not located near neighborhood parks or recreational areas. The General Order will not increase population or change land uses. Therefore, it is not expected to impact the use of existing neighborhood and regional parks or result in the need for additional recreational facilities.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will not have a substantial impact on recreational facilities or result in the need for new recreational parks or facilities.

XVII. Transportation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

Discussion

a-d) **No impact.** The General Order will not conflict with any local traffic or circulation plans or contribute to potential adverse impacts to transportation services or facilities. Facilities potentially regulated under the General Order will generally result in vehicle traffic associated with product delivery, and employee and/or visitor access. The amount of vehicle traffic will vary depending on the facility. However, adoption and implementation of the General Order will not directly lead to increase production or processing capacity. Potential traffic impacts from facility operations are beyond the scope of this analysis since design and land use planning is within the jurisdiction of local authorities. Expansion of existing facilities or construction of new facilities after the General Order is adopted will be subject to local use permits and an associated project level CEQA review at which time potential adverse traffic impacts must be evaluated and appropriate mitigation measures implemented.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have no impact on transportation services and facilities. The local authority will continue to have jurisdiction on vehicle access and traffic plans for new construction or modifications to existing structures on a site-specific basis. The adoption and implementation of the General Order will not affect those requirements.

XVIII. Tribal Cultural Resources (TCRs)

Recognizing that California tribes are experts in their tribal cultural resources and heritage, Assembly Bill 52, which became effective on 1 July 2015, requires CEQA lead agencies provide tribes that requested notification an opportunity to consult at the commencement of the CEQA process to identify TCRs. Furthermore, because a significant effect on a TCR is considered a significant impact on the environment under CEQA, consultation is used to develop appropriate avoidance, impact minimization, and mitigation measures. On 5 March 2026, Project notification letters with invitations to consult on the Project were sent to identified tribal representatives within the Central Valley region. No tribes requested to be consulted during preparation of this Initial Study.

Issues (and Supporting Information Sources):	***Potentially Significant Impact***	***Less than Significant with Mitigation Incorporated***	***Less-than-Significant Impact***	***No Impact***
XVIII. TRIBAL CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Pub. Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Pub. Resources Code Section 5020.1(k), or	☐	☐	☒	☐

Issues (and Supporting Information Sources):	***Potentially Significant Impact***	***Less than Significant with Mitigation Incorporated***	***Less-than-Significant Impact***	***No Impact***
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Pub. Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Pub. Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Discussion

a-b) **Less than significant.** The General Order will not directly impact TCRs. However, facilities potentially regulated under the General Order may be located in a variety of settings, including areas with potential TCRs. Impacts to TCRs at existing facilities is unlikely given previous ground disturbing activities during construction and routine agricultural operations. However, it is not possible to evaluate potential impacts to TCRs from expansion or construction of new facilities after the General Order is adopted. Expansion of existing facilities or new facilities constructed after the General Order is adopted will be subject to local agency permits and an associated project level CEQA review, at which time potential impacts to TCRs would be evaluated and appropriate mitigation measures implemented, reducing potential impacts to less than significant.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact on TCRs. Expansion of existing facilities or new facilities constructed after the General Order is adopted will be subject to local agency permits and an associated project level CEQA review. The adoption and implementation of the General Order will not affect those requirements.

XIX. Utilities/Services

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

a-c) **Less than significant.** The General Order will not in itself directly cause potential adverse impacts to publicly owned treatment works or result in increased need for power, water, storm water, and sewer services. Facilities that would potentially be regulated under the General Order may be required to make improvements in treatment, storage, or disposal methods. New or expanded treatment may be required to comply with General Order requirements. However, these treatment systems will be privately owned and will not affect publicly owned treatment works. Most fruit and vegetable packing facilities are located in rural areas away from public water and sewer services as such most utilize onsite water supply wells and onsite septic systems to provide water and handle domestic wastewater. Therefore, any addition or expansion to existing facilities is unlikely to significantly impact public utility services. Construction of new facilities after the General Order is adopted will be subject to local use permits and an associated project level CEQA review at which time potential adverse impacts and need for utility services must be evaluated and appropriate mitigation measures implemented.

d) **Less than significant.** Packing facilities will generally apply waste solids to agricultural land as a soil amendment or haul it off for livestock feed. Facilities regulated under the General Order may generate some solids that would be sent to a regulated composting facility or landfill for disposal. However, these quantities are expected to be small and not significant enough to cause capacity issues.

e) **Less than significant.** The General Order requires dischargers to comply with federal, state, and local statues and regulations related to solid waste handling and disposal.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project will have a less than significant impact on the need for utility services or result in an increased need for public wastewater treatment or landfill capacity. Expansion of existing facilities or new facilities constructed after the General Order is adopted will be subject to local use permits and an associated project level CEQA review. The adoption and implementation of the General Order will not affect those requirements.

XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones.

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XX. WILDFIRE. Would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion

a-d) **No impact.** The General Order is intended as a regulatory mechanism to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities and will not conflict with any wildfire emergency response or evacuation plan. Facilities whose discharges would potentially be regulated under the General Order may be located in a variety of settings, including wildfire prone areas. Because site-specific projects have not been determined, this evaluation cannot address potential site-specific impacts. The General Order does not directly permit habitat modification or other forms of construction that would exacerbate potential wildfire risks. Expansion of existing facilities or creation and operation of new facilities and land application areas after adoption of the General Order will be subject to local agency approvals, permits, and possibly a project level CEQA review, which shall address potential mitigation for wildfire risk including grading plans and emergency access.

Mitigation Measure(s):

None

Conclusion:

The Proposed Project would have no impact on wildfire safety and emergency response plans. The local authority will continue to establish appropriate locations and design standards for new construction or modifications to existing structures on a site-specific basis. At a minimum these projects would be subject to local building codes developed to reduce the risk of loss, injury, or death from potential wildfire hazards. The adoption and implementation of the General Order will not affect those requirements.

XXI. Mandatory Findings of Significance

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially 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, substantially 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 which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion

a) The General Order is intended as a regulatory mechanism to regulate the discharge of process wastewater and solids from fruit and vegetable packing facilities and is not tied to a specific site. Direct or indirect discharges to surface waters are prohibited. Furthermore, dischargers are prohibited from polluting groundwater or surface water and adversely affecting beneficial uses or causing an exceedance of a water quality objective as outlined in the applicable Basin Plan or other applicable State Water Board or Central Valley Water Board policy. Facilities potentially regulated under the General Order are generally located in existing agricultural areas. As a result, adoption and implementation of the General Order is unlikely to substantially reduce the habitat of any fish or wildlife species, threaten or eliminate a plant or animal community, or reduce or restrict the range of a threatened or endangered species. Expansion of existing facilities or creation and operation of new facilities will be subject to local agency approvals, permits, and project level CEQA review, which shall address the potential for environmental impacts to plant, wildlife, and aquatic species.

b) As described in item (a) above, this evaluation does not address a specific site; however, based on typical packing facility operations, adoption and implementation of the General Order is unlikely to result in cumulatively significant effects on the environment. Further, adoption and implementation of the General Order is unlikely to increase production or result in an increased number of packing facilities operated within the region. The General Order contains an analysis of potential impacts to water quality. The limited degradation of groundwater by typical waste constituents released from the application of process wastewater and solids to land as allowed under the General Order is consistent with the maximum benefit to the people of the State. The General Order incorporates BMPs and BPTC to minimize degradation of water quality, reducing potential impacts to less than significant levels. Cumulative impacts associated with the sitting of multiple facilities within a limited area is beyond the scope of this analysis since placement and design for construction of new facilities is at the discretion of the local authorities in a given area. Adoption and implementation of the General Order will not change these requirements.

c) Potential impacts to human beings from adoption and implementation of the General Order, such as impacts to water quality or public health, are expected to be less than significant. Dischargers obtaining coverage under the General Order are subject to plans and policies adopted by the State and Central Valley Water Board as well as local agency sitting and design criteria. Thus, reducing potential cumulative impacts to less than significant levels. Expansion of existing facilities or creation and operation of new facilities will be subject to local agency approvals, permits, and possibly a project level CEQA review, which shall address the potential for environmental impacts that might cause adverse impacts on human beings.

DETERMINATION: (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ 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.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ 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.

☐ 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.

Alexander Mushegan
Digitally signed by Alexander Mushegan
Date: 2026.09.10 15:02:03 -07'00'
Water Boards

Signature