

Initial Environmental Study
&
Mitigated Negative Declaration

**LIVINGSTON FARMERS
ASSOCIATION
EXPANSION
PROJECT**

*Major Modification No. MM18-007 to Conditional Use Permit
No. CUP 3101*

Livingston Farmers Association

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SECTION 1: INTRODUCTION

1.1 - Purpose

Pursuant to Section 15063 of the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code Regulations, Sections 15000 et seq.), an Initial Study (IS) is a preliminary environmental analysis that is used by the lead agency as a basis for determining whether an Environmental Impact Report (EIR), a Mitigated Negative Declaration (MND), or a Negative Declaration (ND) is required for a project. The CEQA *Guidelines* require that an IS contains a project description, description of environmental setting, an identification of environmental effects by checklist or other similar form, an explanation of environmental effects, a discussion of mitigation for significant environmental effects, an evaluation of the project's consistency with existing applicable land use controls, and the names of persons who prepared the study.

The purpose of this IS is to identify the potential environmental impacts associated with the proposed Livingston Farmers Association Expansion Project also known as Major Modification No. MM18-007 to Conditional Use Permit No. CUP 3101 in the Livingston area of Merced County, California and to describe measures that would avoid or mitigate significant impacts. The IS includes information to substantiate the conclusions made regarding the potential of the proposed project to result in significant environmental effects and provides the basis for input from public agencies, organizations, and interested members of the public. Pursuant to Section 15367 of the California Environmental Quality Act (CEQA) Guidelines, Merced County is the Lead Agency for the proposed project and as such, has the primary responsibility for approval or denial of the project.

1.2 - Project Location

A. Location

The existing site consists of a permitted sweet potato storage and packing facility and an almond hulling and processing facility, which has been in operation for approximately 60 years. The existing agricultural processing facility and proposed expansion is located on the southwest corner of Eucalyptus Avenue and Sultana Drive, approximately 0.75 miles northeast of the City of Livingston, in the County of Merced. The property is a generally rectangular shaped parcel, consisting of approximately 40 acres surrounded by orchards and sweet potato fields (see Figure 1 – Vicinity Map). The property is designated Agricultural in the General Plan and zoned A-1 (General Agricultural). The property is identified as Assessor's Parcel numbers 143-020-020 and 143-020-017, located within the NE ¼ of Section 19, Township 6 South, Range 12 East, Mount Diablo Base and Meridian.

Figure 2 – Aerial provides an aerial photograph of the project site with the existing buildings. The facility consists of six buildings totaling 27,012 square feet used for processing almonds and sweet potatoes, and a 27,618 square foot shade structure.

Figure 1: Vicinity Map

Vicinity Map for Major Modification 18-007 for Livingston Farmers Association



Figure 2: Aerial

Aerial Photo: Major Modification No. 18-007 for Livingston Farmers Association



1.3 - Project Objective

Project objectives of the proposed Livingston Farmers Association Expansion are as follows:

- Establish 31,690 square feet of new facilities for a sweet potato warehouse, sweet potato processing, and office space, in the form of a new steel building at their current facility.
- Construct two new sweet potato storage buildings 14,400 square feet each.
- Construct a new 53,040 square foot almond hulling plant that includes new steel buildings, conveyor belts, dryers and loading areas.
- Reduce truck trips by providing greater on-site capacity and reducing the need for off-site storage rental.

1.4 - Project Description

Major Modification No. MM18-007 to Conditional Use Permit No. CUP 3101 proposes to construct a new 31,690 square foot sweet potato processing facility with an office, two new 14,400 square foot sweet potato storage buildings, and a 53,040 square foot almond hulling and processing facility. The project site is located at 11018 W. Eucalyptus Avenue, Livingston, California. The proposed expansion would increase Livingston Farmers Association's storage capacity, reduce the need to rent off-site storage, and improve the efficiency of their operations.

Located approximately 0.75 miles northeast of the City of Livingston, California, the agricultural food processing facility currently includes six structures totaling 27,012 square feet that are used for sweet potato storage, packing, shipping, an office, scale house, almond hulling, and equipment maintenance, and a 27,618 square foot shade structure. The remainder of the parcel is used to store shells, hulls and farm equipment. Upon completion, the proposed buildings would be used to expand both the sweet potato operation and the almond hulling operations. This IS will evaluate the impacts of the proposed project to ensure they are properly addressed and analyzed in accordance with the California Environmental Quality Act (CEQA).

Site Plan (See Figure 3 – Site Plan): The proposed site plan shows the location of the proposed buildings. Construction of Almond Hulling Plant will commence at a future date that will be determined by the business' growth and demand.

Agricultural Operations: Existing on-site operations include two buildings totaling approximately 13,500 square feet for sweet potato storage, fumigation, cleaning, packing, and distribution. Additionally there are four structures totaling approximately 13,000 square feet for almond processing, administrative operations, maintenance, and a 27,618 square foot shade structure. Approximately 20 persons are

employed year round, with approximately 60 additional workers added as needed to accommodate crop cycles and demand. For office staff, hours of operation are between 7:00am and 4:00pm, Monday through Friday most of the year. Sweet potato employees work from 6:00am to 4:00pm, Monday through Friday, most of the year and during harvest they may work until 11:00pm. The almond employees work from 7:00am to 3:30pm most of the year and during harvest season they generally work 24 hours a day.

Parking: The existing parking area consists of approximately 18 parking spaces on an all-weather surface. A total of 35 parking spaces (including 2 accessible spaces) are proposed at full buildout with this permit.

Circulation: Vehicular access to the site is provided by three driveway accesses along Eucalyptus Avenue and one driveway access on Sultana Drive.

Landscaping: There are no landscaping requirements in the Agricultural zone.

Lighting: Existing lighting fixtures are in compliance with Section 18.41.060 of the Merced County Zoning Code which require exterior lighting be designed and maintained in a manner so that glare and reflections are contained within the boundaries of the parcel. Lighting fixtures shall be hooded, directed downward and away from adjoining properties and public rights-of-way. Any additional lighting that is required as a result of the additional buildings will be required to be in compliance with this section of the Zoning Code as well.

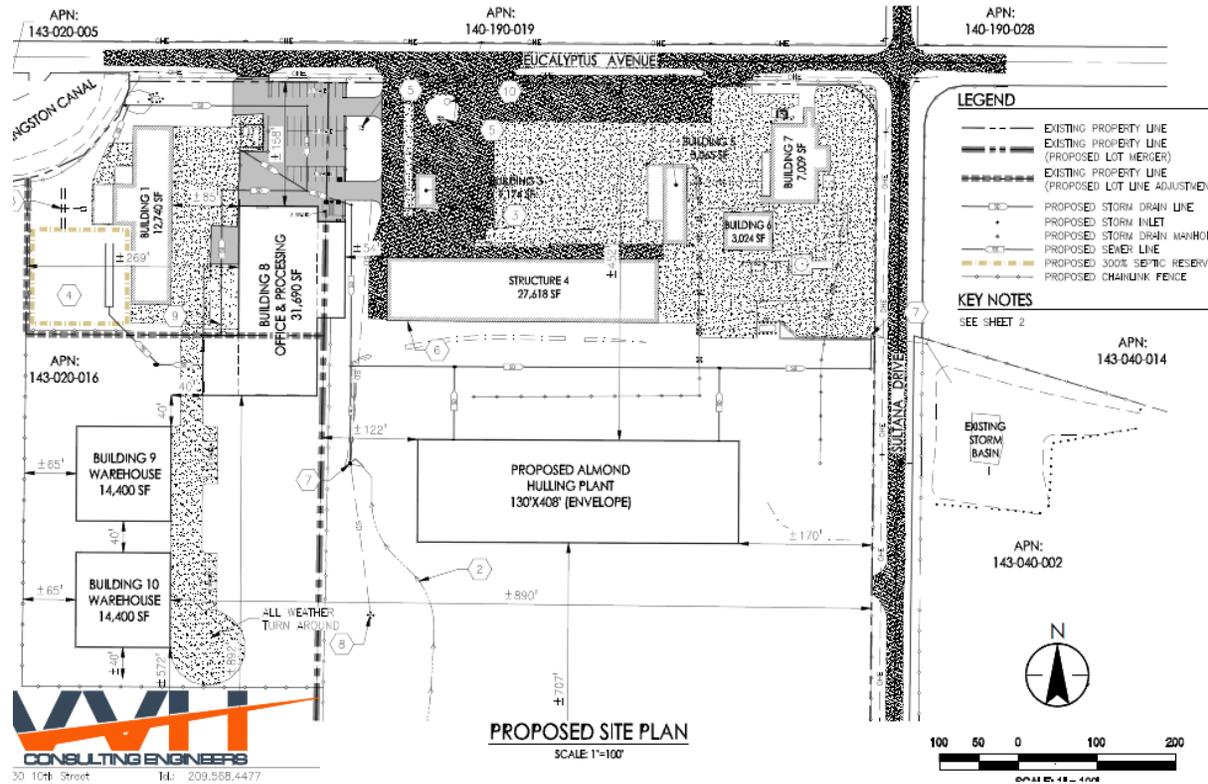
Utilities and Services: The existing sweet potato and almond processing facility is served by a private on-site septic system and well. Waste Management provides trash services and Pacific Gas and Electric provides electricity for the facility. Fire Protection is provided by the Merced County Fire Department. Police services are provided by the Merced County Sheriff.

Permit History

The original permit, LU 1927, was approved by the Planning Commission on May 21, 1974 to construct a supply and equipment shop to be added to an existing operation. Subsequently, CU 2671 was approved on September 23, 1981 to construct a fumigation building; CU 3101 was approved on May 22, 1985 to legalize an existing almond huller and scale house; CU 3225 was to convert existing storage to an almond processing plant and was withdrawn; MM 04-001 was approved on February 17, 2004 to legalize an almond hulling facility and a dryer building; Certificate of Compliance No. CC01-024, and Minor Subdivision No. MS08-016.

Required Discretionary Actions: Based on past permit history, Staff has determined that a Major Modification to the Conditional Use Permit is required for the proposed development to properly address potential impacts to the site and surrounding area.

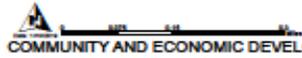
Figure 3: Site Plan



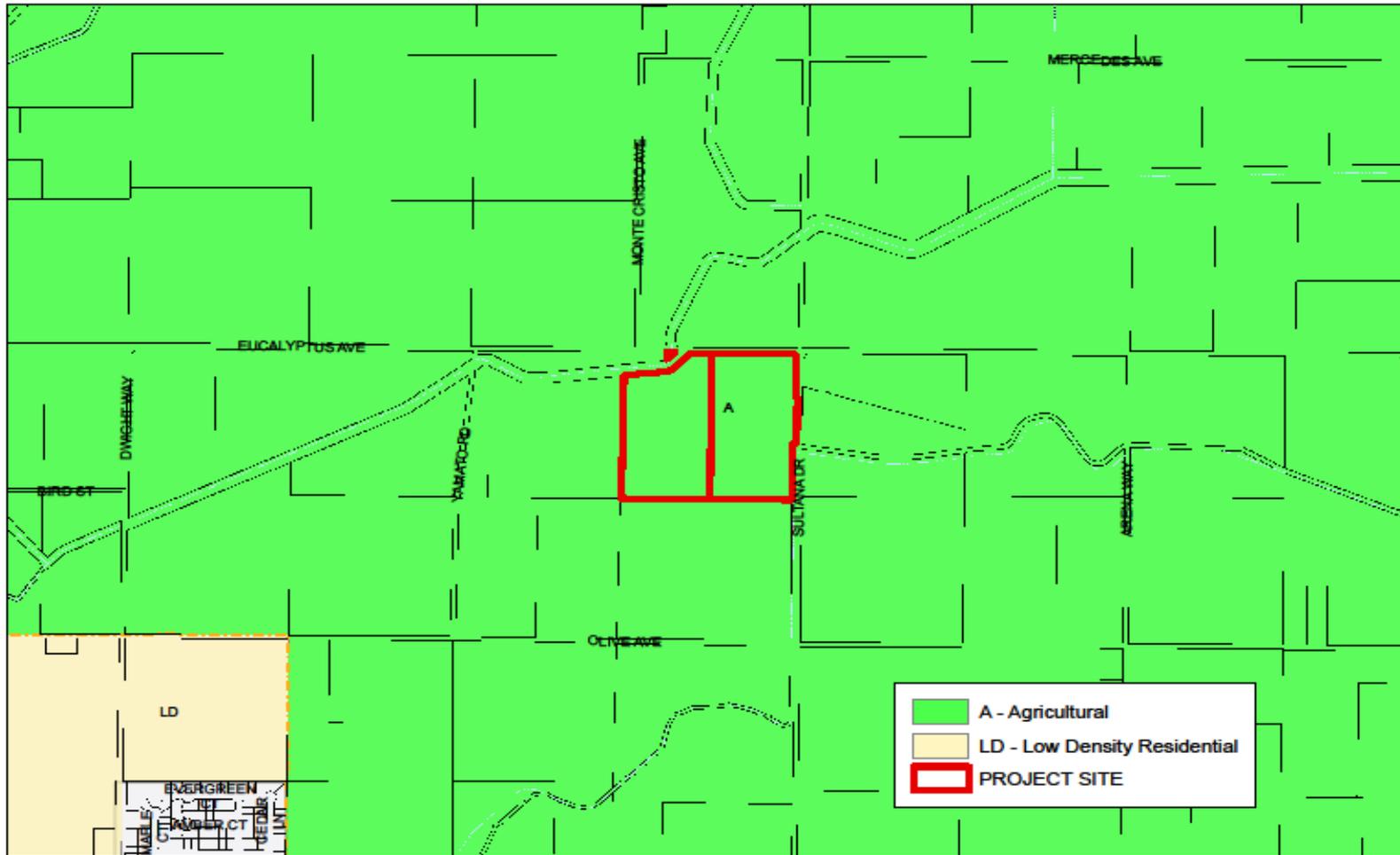
1.5 – General Plan Designation

The 2030 Merced County General Plan identifies the project site as Agricultural. This land use designation is described as relatively flat, with elevations less than 150 feet above sea level, very slow to moderate water runoff potential, very limited to moderate erosion potential, moderate to excellent water availability, and deeper and more fertile topsoil.

Figure 4: General Plan Designation



GENERAL PLAN DESIGNATION



*Data displayed subject to change.

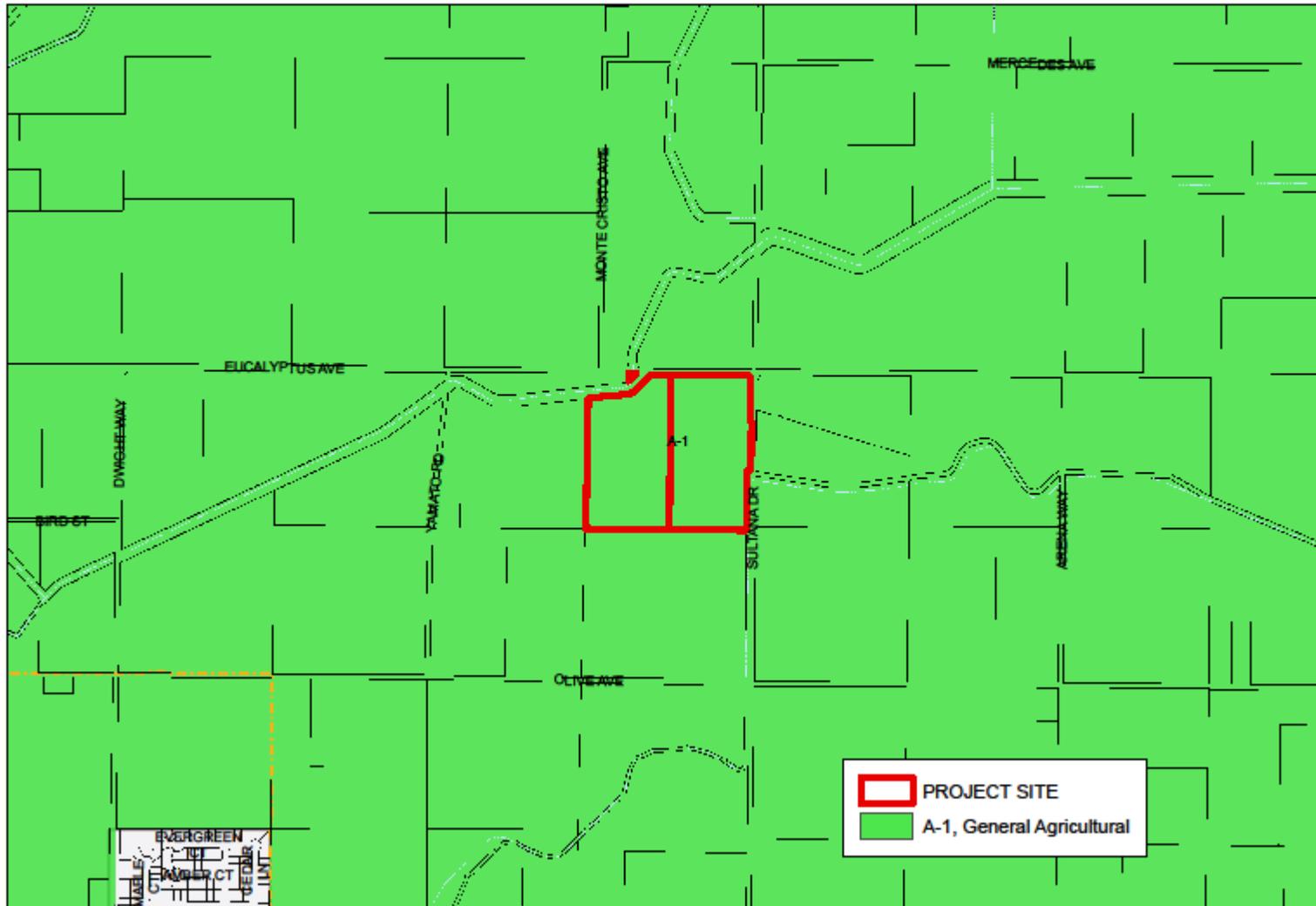
1.6 – Zoning

The project site is zoned A-1 (General Agricultural) (See Figure 5 - Zoning). Pursuant to Section 18.02.010 of the Merced County Zoning Code, the A-1 (General Agricultural) zoning designation is to provide for areas for more intensive farming operations dependent on higher quality soils, water availability and relatively flat topography, and agricultural and/or industrial uses dependent on proximity to urban areas or location in sparsely populated low traffic areas. Parcels that are smaller than 40 acres down to a minimum of 20 acres can be considered where agricultural productivity of the property will not be reduced. The existing use for this property is an approved almond hulling and sweet potato packing facility. The proposed additional almond hulling facility and sweet potato packing facility are an expansion of the existing use.

Figure 5: Zoning

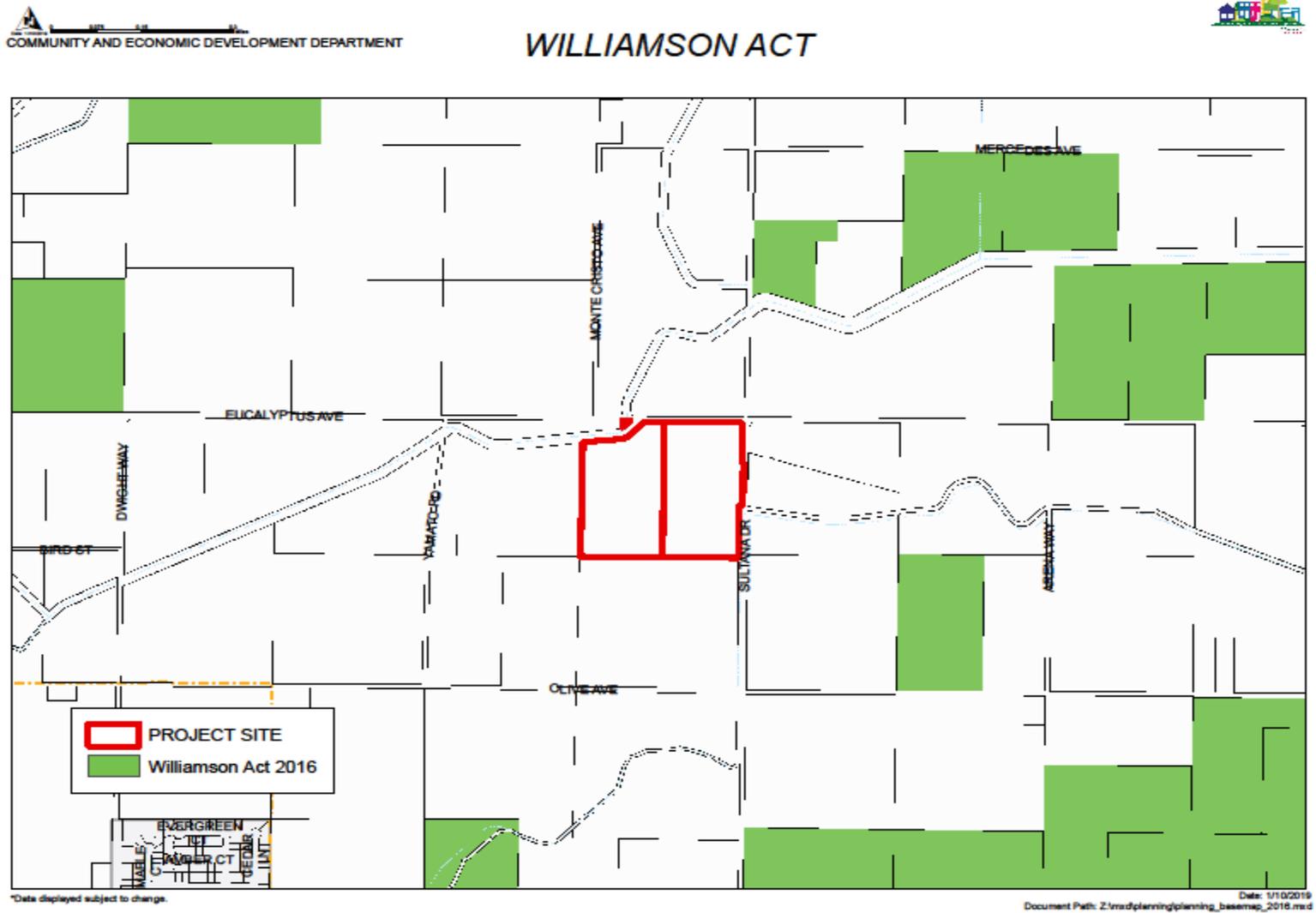


ZONING



*Data displayed subject to change.

Figure 6: Williamson Act Contracted Land



1.7 - Summary of County and Agency Approvals

The project would require the following discretionary approvals:

Merced County – Adoption of the Initial Study – Mitigated Negative Declaration.

Merced County – Approval of the Major Modification to a Conditional Use Permit.

SECTION 2: ENVIRONMENTAL CHECKLIST

2.1 - Purpose and Legal Basis for the Initial Study

As a public disclosure document, this IS provides local decision makers and the public with information regarding the environmental impacts associated with the proposed project. According to Section 15063 of the *CEQA Guidelines*, the purpose of the IS is to:

1. Provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR), or a Negative Declaration (ND).
2. Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.
3. Assist in preparation of an EIR, if one is required, by:
 - a. Focusing the EIR on the effect determined to be significant;
 - b. Identifying the effects determined to be potentially significant that would not be significant; and,
 - c. Identifying whether a program EIR, tiering, or other appropriate process can be used for analysis of the project's effects.
4. Facilitate environmental assessment early in the design of a project.
5. Provide documentation of the factual basis for the finding in a Negative Declaration that the project will not have a significant effect on the environment.
6. Eliminate unnecessary EIRs.
7. Determine whether a previous EIR could be used with the project.

This IS evaluates the potential for the proposed project to result in environmental impacts, evaluates the significance of those impacts, and defines mitigation measures to avoid or reduce impacts to less than significant levels. The information in this IS will be used by the County to determine if a Negative Declaration or an EIR is the appropriate level of CEQA documentation. The IS will also serve as a basis for soliciting comments and input from members of the public and public agencies.

2.2- Checklist and Evaluation of Environmental Impacts

The Environmental Checklist in this Initial Study is consistent with the CEQA Environmental Checklist Form included as Appendix G of the CEQA Guidelines. A description of the environmental setting and an explanation for all checklist responses is included. Where appropriate, mitigation measures are identified to avoid or reduce the significance of a potential impact.

2.3 - Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

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

1. AESTHETICS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4

The proposed project is located in Merced County, known for its panoramic views of the Coast Range to the west and the Sierra Nevada to the east, mixed with open orchard lands and field crop areas, and seasonal contrasts of flourishing hillsides and wetlands. According to the General Plan, scenic vistas include the Coastal and Sierra Nevada mountain ranges, the Los Banos, Merced, San Joaquin, and Bear Creek river corridors with State Route 152 (SR-152) and Interstate 5 (I-5) as designated scenic routes. The sweet potato and almond facility is located approximately one mile south of the Merced River and is not within the scenic vista designated corridor. SR-152 runs east to west approximately 25 miles south of the site and I-5 runs north to south approximately 25 miles west of the site. The proposed buildings will not be visible from either highway.

The existing sweet potato storage and almond hulling facility is located in an agricultural setting. Areas directly adjacent to the developed site include orchards and cultivated land. The surrounding areas are also primarily orchards and farmland with scattered rural residences. Views of the mountain ranges can be seen distantly but do not dominate the visual landscape.

- a.** **No Impact.** As discussed above, lands surrounding the project site have been highly modified for agricultural production. As a result, the terrain is very flat, and most of the native trees and vegetation have been removed. Because of the flat terrain, views in the project vicinity are generally unobstructed surrounding the project site. There are no unique visual features or scenic vistas in the project area. No roadways in the project vicinity are designated as scenic under existing visual protection programs. Therefore, no impacts in this regard would occur.
- b.** **No Impact.** As mentioned above, there are no officially designated State Scenic Highways or Routes in the project vicinity. Therefore, the project would have no impact

on scenic resources such as rock outcroppings, trees, or historic buildings within view from a scenic highway.

- c.* **Less Than Significant Impact.** The project site, Livingston Farmers Association packing and storage facility, has been in operation since 1956 and is partially visible from the adjacent roadways and residences. Views of the project area are of other agricultural operations, which include almond orchards and other regional crops. Nearby agricultural and industrial land uses contain visual elements such as overhead transmission lines, agricultural outbuildings, and traffic signs. Expansion of the existing operation would include four buildings, which would be similar in visual appearance to those that are currently present on the project site; therefore, the expansion would not substantially degrade the existing visual character or quality of the site or its surroundings and this impact is considered less than significant.
- d.* **Less Than Significant Impact.** New sources of nighttime lighting would be created in the form of 50 exterior lights surrounding the buildings and parking lots. However, exterior lighting is already in place on the existing buildings. Lighting located at surrounding residences also contributes to the area's nighttime lighting. Furthermore, lighting would be required to meet Merced County's lighting code 18.41.060, which requires the use of directional lighting and minimization of glare and reflections. Since similar lighting already exists at the project site and lights from other land uses already exist in the project's vicinity, the project's contribution to existing sources would be minimal and impacts to existing nighttime views would be less than significant.

2. AGRICULTURAL AND FOREST RESOURCES

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3
c) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1, 2
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3

a. Less Than Significant Impact. Farming operations in the project area generally consist of small to medium scale inter row cropping systems, grazing land, orchards and fallow or bare parcels formerly under agricultural use. Based on a review of maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, the project site is mapped as containing approximately 6 acres of “Prime Farmland”, approximately twelve acres of “Farmland of Statewide Importance” and approximately 22 acres of “Semi-Agricultural and Rural Commercial Land.” (FMMP). Prime farmland has the best combination of physical and chemical features able to sustain long term agricultural production (FMMP), including, but not limited to, soil quality, growing season, and moisture supply needed to produce sustained high yields. Land immediately adjacent to the project site to the south and west is classified as “Farmland of Statewide Importance,” and land north of the site is classified as “Prime Farmland”. Land to the east is classified as Semi-Agricultural and Rural Commercial Land, “Farmland of Local Importance” and “Prime Farmland” (FMMP). According to the 2012 FMMP Data, the proposed buildings would be located within land designated as “Semi-Agricultural and Rural Commercial Land.” While the proposed expansion would preclude any farming practices from occurring, the proposed agricultural storage is considered an ‘agricultural support and processing operation, which is consistent with the current land use designation and zoning classification under the Merced County General Plan and Zoning Code. Furthermore, the proposed operation would lend further support

to the agricultural industry in not only Merced County, but also the Central Valley region and is specifically identified by the Merced County General Plan as being consistent with the surrounding rural agricultural uses. In light of these factors, the conversion of approximately 3 acres of “Semi Agricultural and Rural Commercial” land is considered to be a less than significant impact.

- b.* **No Impact.** No Williamson Act contract exists for the site. As shown in Figure 6, the closest parcel under Williamson Act contract is located northeast of the project site. Since the proposed project is consistent with existing land use and zoning designations and supports agricultural operations, the project is not expected to encourage the non-renewal or cancellation of other contracted lands. Impacts are therefore considered no impact.
- c.* **No Impact.** The proposed expansion of the almond processing facility would not involve the development of any use that would be inconsistent with the agriculture zoning of the project site, and it would not result in the development of non-agricultural uses that could result in the conversion of adjacent producing agricultural lands.
- d-e* **No Impact.** The project site is not considered forest land, timberland, and is not zoned Timberland Production. There are no forest lands adjacent to the project site. The proposed project would not result in the off-site development or conversion of existing agricultural or forest lands. The offsite infrastructure needed to serve the project site would not require the expansion of any infrastructure or roadways that could lead to the indirect conversion of agricultural or forest lands. Therefore, the proposed project would result in no impact to the existing environment that could result in loss of farmland to non-agricultural uses or conversion of forest land to non-forest uses.

This project involves the addition of four agricultural processing buildings to an existing almond hulling and sweet potato storage and packing facility which supports agricultural production and commerce, and does not include residential development. The proposed land use is consistent with both the General Plan land use and zoning designations. The Merced County General Plan indicates that agricultural packing and processing operations that take place at the Livingston Farmers Association facility are consistent with the adjacent land uses and the rural agricultural areas within the project vicinity based on the Merced County General Plan land use designation and zoning classifications. As such, the project would not place pressure on adjacent agricultural lands to convert to nonagricultural uses or create conflict between nearby land uses. Impacts in this regard would be no impact or less than significant.

3. AIR QUALITY

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2, 4
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2, 4
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1, 2
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1

Ambient air quality is described in terms of compliance with state and national standards, and the levels of air pollutant concentrations considered safe to protect the public health and welfare. These standards are designed to protect people most sensitive to respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. The U.S. EPA, the federal agency that administers the Federal Clean Air Act (CAA) of 1970, as amended in 1970, has established national ambient air quality standards (NAAQS) for seven air pollution constituents. As permitted by the CAA, California has adopted more stringent state ambient air quality standards (SAAQS), and expanded the number of air constituents regulated.

Merced County is located in the San Joaquin Valley Air Basin (SJVAB). Under both the federal and state CAAs, the San Joaquin Valley Air Pollution Control District (SJVAPCD) regulates air quality in Merced County. The SJVAPCD has jurisdiction over all point and area sources of air emissions except for mobile sources (such as motor vehicles), consumer products, and pesticides. Furthermore, the SJVAPCD implements air quality management strategies and enforces its Rules and Regulations to improve the health and air quality for Valley residents. The SJVAPCD and the California Air Resources Board (CARB) have joint responsibility for attaining and maintaining the NAAQS and SAAQS in the SJVAB.

The SJVAB is currently in “severe” nonattainment for the state 1-hour ozone standard; “extreme” nonattainment for the federal 8-hour ozone standard; nonattainment for the state 8-hour ozone standard; and nonattainment for federal and state PM2.5 standards. The SJVAB is in nonattainment for the state PM10 standards, but is in attainment with the federal standard. Concentrations of all other pollutants meet state and federal standards.

ENVIRONMENTAL SETTING

Air Quality Assessment

The SJVAPCD's *Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI), 2002 Revision* indicates that an impact resulting from construction activities would be considered significant if feasible construction control mitigation measures identified in the SJVAPCD's CEQA Guidelines and applicable Rules and Regulations were not implemented. Further, the CEQA Guidelines Initial Study Land Use and Planning checklist states that conflicts with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect should be considered during a project's environmental review. GAMAQI has established thresholds for certain criteria pollutants for determining whether a project would have a significant air quality impact. SJVAPCD significance thresholds include 10 tons/year of NO_x, 10 tons/year ROG, and 15 tons/year of PM₁₀ (SJVAPCD 2012).

To streamline the process of assessing significance of criteria pollutant emissions from commonly encountered projects, the SJVAPCD has developed the screening tool, Small Project Analysis Level (SPAL). Using project type and size, the SJVAPCD has pre-quantified emissions and determined a size below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants. According to the SPAL requirements, no quantification of ozone precursor emissions is needed for projects less than or equal to the size thresholds, by vehicle trips and by project type. If other emission factors such as toxic air contaminants, hazardous materials, asbestos, or odors are apparent, these emissions must be addressed.

The proposed project would involve the construction of four agricultural processing buildings totaling approximately 113,530 square feet, for processing sweet potatoes and almonds. The proposed project does not fit into any of the land use categories identified in the SPAL, but is similar to the industrial land use category for manufacturing. This land use category has a 400,000 square feet project size threshold, and the proposed project would not exceed the SPAL threshold for this project type (SJVAPCD 2012). Also, the estimated project Average Daily Trips (approximately 55 truck trips per day loading or unloading during the peak time of the year, in addition to forklift use to move boxes) would not exceed the SPAL threshold for vehicle trips for an industrial project (1,506 ADT). Therefore, the project qualifies to complete the SPAL approach, and no quantification of ozone precursor emissions would be required. According to the SJVAPCD, project specific emissions of criteria pollutants are not expected to exceed SJVAPCD significance thresholds of 10 tons/year of NO_x, 10 tons/year ROG, and 15 tons/year of PM₁₀ (SJVAPCD 2012).

- a. Potentially Significant Unless Mitigation Incorporated.** The proposed project would be consistent with the Agricultural General Plan land use designation of the site set forth by the 2030 Merced County General Plan. Thus, the proposed project would be consistent with the land use assumptions used by the SJVAPCD in drafting the air quality attainment plans described above.

The proposed storage facility project criteria air emissions would not be expected to exceed thresholds set by SJVAPCD based on project size and proposed operations. The proposed project would be subject to SJVAPCD Rules and Regulations, which may include: Regulation VIII (Fugitive PM₁₀ Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations) (SJVAPCD 2014). To ensure continued project compliance with applicable SJVAPCD Rules and Regulations, the following mitigation measure would be required:

Mitigation Measure AQ-1:

Prior to the issuance of the building permit from Merced County, the project applicant must contact the SJVAPCD's Business Assistance Office to identify applicable SJVAPCD Rules and Regulations. The proposed project would need to demonstrate compliance with Regulation VIII – Fugitive Dust PM10 Prohibitions; and may be subject to additional rules, including, but not limited to Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). The project applicant will be required to implement measures of applicable SJVAPCD Rules and Regulations as noted.

Implementation of Mitigation Measure AQ-1 would require compliance with applicable Rules and Regulations of the SJVAPCD as described above, and ensure the proposed project would not conflict with or obstruct implementation of any SJVAB attainment plan or the SIP. Therefore, a less than significant impact would result, and no additional mitigation would be necessary.

b, c.

Less Than Significant Impact. Implementation of the proposed project would result in construction and operational emissions, including ROG, CO, SO₂, NO_x, and fugitive dust. Construction emissions would be due to site clearing, grading, excavation, building, and paving activities. Operation emissions would consist of heavy truck trips associated with the potato harvest and almond harvest, in the months of September through December. Based on SJVAPCD project screening criteria and the guidance outlined in the GAMAQI, the size of the project indicates that it would qualify as a SPAL project, and would not exceed the SJVAPCD's emission thresholds for criteria pollutants during construction or operation.

Although the proposed project would not exceed SJVAPCD significance thresholds, the applicant would still be required to comply with Regulation VIII- Fugitive Dust PM10 Prohibitions, and all applicable SJVAPCD Rules and Regulations. A summary of control measures for construction and other earthmoving activities that would generate fugitive dust are included in Regulation VIII. Compliance with Regulation VIII would ensure that the proposed construction-related emissions are reduced, and would not exceed SJVAPCD significance criteria.

Because project construction and operation emissions of criteria pollutants are not expected to exceed SJVAPCD significance thresholds, and the proposed project would comply with applicable SJVAPCD Rules and Regulations, the project would not emit air pollutants that would violate any air quality standard or contribute to an existing air quality violation, or result in a cumulatively considerable net increase in any criteria pollutant. A less than significant impact would result, and no mitigation would be necessary.

d.

Less Than Significant Impact. The nearest existing residential structures that would be considered sensitive receptors are approximately 1,200 feet west of the proposed project site.

Construction equipment generates diesel particulate matter (DPM), identified as a carcinogen by the CARB. The State of California has determined that DPM from diesel-fueled engines poses a chronic health risk with chronic inhalation exposure. The

California Office of Environmental Health Hazard Assessment (OEHHA) recommends using a 70 year exposure duration for determining residential cancer risks. Because of the project size and short duration of construction activities with potential to generate toxic air emissions, it is highly unlikely that the construction would pose a toxic risk to nearby residents. In addition, the proposed facilities would not utilize fumigants or other potential toxic air contaminants. The project would not significantly expose sensitive receptors to substantial pollutant concentrations.

- e.* **Less Than Significant Impact.** The only potential odors associated with the project would be from diesel exhaust and the application of paint during the construction period. These odors, if perceptible, are common in the environment, would dissipate rapidly as they mix with the surrounding air, and would be of very limited duration. Therefore, any potential odor impacts would be considered less than significant.

4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2, 5
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5, 6
c) Have a substantial adverse effect on federally protected wetlands, as defined by Section 405 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5, 6
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5, 6
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1,7
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

a-f. Less Than Significant Impact. The project site is highly disturbed from current agricultural activities. Soils are extremely sandy. The majority of the site is regularly disked and vegetation in these areas consists solely of scattered, non-native plant species. The geographic location of the site and the visibly alkaline, sandy soils suggest that the project site may have historically supported alkali desert scrub.

No special or sensitive species have been identified on-site and the project site is not located near federally protected wetlands according to data provided in the California

Natural Diversity Database (CNDDDB). Therefore, the modification would not have a substantial adverse effect on special status species, riparian habitat or other sensitive natural community, or protected wetlands. The modification will not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or established native resident or migratory wildlife corridors. The modification will not conflict with any local policies or ordinances protecting biological resources; or provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan; or, other approved local, regional, or state habitat conservation plan.

5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1, 2
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1, 2
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1

A cultural resources survey and assessment of Merced County was completed for the adopted 2030 General Plan meeting Section 15064.5 of the CEQA Guidelines. A detailed description of archival research and field survey methods can be found in the Merced County General Plan Background Report.

- a-b. Less Than Significant.** The facility is an existing permitted sweet potato processing facility and an almond hulling facility consisting of nine buildings, used for storage, packing, shipping, almond hulling and administration. No recorded significant historical resources or archaeological sites are located on the property, and given the previously disturbed nature of the site from prior construction and agricultural use, a less than significant impact is expected.
- c. Less Than Significant Impact.** The proposed project would be built on a site that is already disturbed, with no known cultural resources located on-site.
- d. Less Than Significant Impact.** No known human remains are present on-site or have been discovered from prior construction. Therefore, no impact is expected. However, in the likelihood that human remains or unrecorded resources could be exposed during construction activities, Section 7050.5 of the California Health and Safety Code will be implemented. Section 7050.5 requires that all construction and excavation be stopped until the county coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must contact the California Native American Heritage Commission.

6. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death, involving:					
i) Rupture of a known earthquake fault, as delineated 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1, 2
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1, 2
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1, 2
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1, 2
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1, 2
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1

The project site is located in the San Joaquin Valley, which is a broad alluvial plain between the Sierra Nevada foothills and Coastal Range. Alluvial fan and floodplains make up the majority of soils in northern Merced County and are typically sandy. These soils are used primarily for alfalfa and specialized crops.

Geologic formations found within Merced County are composed of the Basement Complex, Ione Formation, Valley Springs Formation, Mehrten Formation, Tulare Formation, and recent alluvium. The basement complex is composed of crystalline igneous and metamorphic rocks and lie beneath the sedimentary units. The formation can be composed of claystone, sandstones, conglomerates, and siltstones. Quaternary river and flood plain deposits, consisting of clays, silt, sands, and gravel overly the formations as soil deposits dominate the geology.

The nearest known faults to Merced County are: The San Andreas Fault approximately 15 miles to the west, the Hayward, Greenville, and Calaveras Faults to the northwest, and the Bear Mountain Fault Zone about five miles east of and parallel to the eastern border of the County.

a.i. **No Impact.** As stated above, there are no known faults that lie within Merced County that will affect the project site. Therefore, no impacts related to the rupture of a known earthquake fault are expected.

a.ii. **Less Than Significant Impact.** The faults mentioned above have been and will continue to be the principal sources of seismic activity affecting Merced County. There are no records of seismic activity originating from the County, but there has been documented shaking from earthquake centers outside the county. Only the 1906 quake caused major damage in the west side of the county in the Los Banos area with minor structural damage occurring throughout the county on other occasions. Based on the very limited fault activity in the County, and the limited external fault impacts that may impact the County, the impact of strong seismic ground shaking would be considered less than significant.

a.iii. **Less Than Significant Impact.** According to the General Plan, no specific liquefaction hazard areas have been identified in the County. This potential is recognized throughout the San Joaquin Valley where unconsolidated sediments and a high water table coincide. Soils in the northeast section of the County have a low potential for liquefaction because the groundwater table is low. Liquefaction is caused when soils subjected to ground shaking lose strength due to increased water pressure. In compliance with the California Building Code (CBC), Section 1803, the applicant must submit a soils report prepared by a licensed soils engineer that addresses soil liquefaction.

According to the General Plan, the project site has not been identified as an area with subsidence. Subsidence is the settling or sinking of part of the earth's crust. Merced County is most affected by subsidence caused by hydro-compaction from groundwater withdrawal and earthquakes. As stated above, since the project site is not within a designated subsidence area, there is no anticipated threat from damage caused by subsidence. Therefore, the project's impacts are considered less than significant.

a. iv. **No Impact.** The project site is not expected to be subject to landslides. The project site and surrounding land are relatively flat land with no substantial slopes nearby. Therefore, the proposed project would not result in impacts that would create landslides.

b. **Less Than Significant Impact.** The project site has been previously cleared and graded, and portions have been paved. While implementation of the proposed project could result in temporary soil erosion and the loss of top soil due to construction activities, the location where the proposed sweet potato storage and almond hulling facilities would be constructed is generally level from previous grading, and minimal modification to the site's existing topography or ground surface relief would be required.

c. **Less Than Significant Impact.** Soils in the project area are typically categorized as sandy, with few building limitations. These limitations would be minimized by project design. In compliance with the California Building Code, a soils report must be prepared by a licensed soils engineer for any new construction. For these reasons, potential

impacts from landslides, lateral spreading, subsidence, or unstable soils would be less than significant, and no mitigation would be necessary.

- d.* **Less Than Significant Impact.** Expansive soils are soils that expand when water is added, and shrink when they dry out. The majority of the project site soils have some building limitations due to moderate shrink-swell potential (NRCS 2013). California Building Code requires a soils report for most non-residential structures within Merced County. Compliance with the CBC requirements would reduce risks on the project site from shrink-swell potential to levels considered acceptable for the state and region and risks from expansive soils would be less than significant; therefore, no mitigation would be necessary.
- e.* **Less Than Significant Impact.** Any existing and future septic systems are required to be reviewed by the Merced County Division of Environmental Health which will determine the appropriate design standards in accordance with all pertinent regulations. Therefore, the impacts are anticipated to be less than significant.

7. GREENHOUSE GAS AND EMISSIONS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9, 1
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1

- a. Less Than Significant Impact.** GHG emissions would be generated from the proposed food processing facility project during construction and operation. GHGs directly associated with the proposed project would likely include nitrous oxide (N₂O), ozone (O₃), and carbon dioxide (CO₂). Construction activities associated with the project would result in short-term and temporary CO₂ emissions. Other GHG emissions may result depending on the type of construction equipment used. Existing operational emissions currently result in CO₂ emissions, which occur from transportation sources (primarily heavy truck trips) and from building electricity.

According to the GAMAQI, the project size (113,530 square feet) is substantially below the SJVAPCD’s screening level (400,000 square feet of industrial/manufacturing land use) for projects expected to emit a substantial amount of criteria pollutants. Based on these numbers, the project is thereby excluded from a quantitative air quality analysis (SJVAPCD 2012). Similarly, the proposed project would make a relatively small contribution to GHG emissions. Therefore, GHG emissions were not quantified.

Because of the low levels of GHG emissions, the proposed project would not be expected to make a substantial contribution of GHG emissions, and a less than significant impact would result.

- b. Less Than Significant Impact.** Merced County has not adopted a Climate Action Plan or any GHG reduction measures other than enforcing the provisions of the Green Building Standards Code and the Title 24, Energy Code. Because transportation is the largest sector of greenhouse gas emissions in California, many reduction strategies focus on reducing travel and making transportation more efficient. Therefore, many of the transportation and land use strategies contained in regional air quality and transportation plans act to reduce GHG emissions as well. The proposed project would be consistent with all applicable provisions of the PM₁₀ and Ozone Attainment Plans, the Regional Transportation Plan, and the San Joaquin Valley Preferred Blueprint Growth Scenario adopted in April 2009 by the San Joaquin Valley Regional Policy Council. Additionally, because the proposed agricultural processing use would be located near the crops it serves and other coordinated processing facilities, crop transportation efficiency would be maximized, thereby reducing truck travel. The proposed project would generate a less than significant level of GHG emissions, and would not conflict with the statewide and regional GHG reduction plans and policies adopted by the CARB and SJVAPCD.

8. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) For a project located within an airport land use plan area, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1, 10

a-b. Less Than Significant Impact. During routine operations, hazardous materials stored or handled on-site will consist of propane or diesel fuel sufficient to power forklifts. Construction activities for the proposed project would involve the use, storage, transport, and disposal of oil, gasoline, diesel fuel, paints, solvents, and other hazardous materials.

Construction activity must be in compliance with the California Occupational Safety and Health

Administration (OSHA) regulations. Compliance with these requirements would reduce the risk of hazards related to the routine transport, use, or disposal of hazardous materials to a less than significant level. Storage of hazardous materials on-site requires filing a Hazardous Materials Business Plan with the Merced County Department of Environmental Health. The risk of hazards to the public or to environmental conditions related to accident conditions would also be reduced to a less than significant level.

- c.* **No Impact.** No schools are located within 0.25 miles of the project site. The closest schools are Shelby School, located 1 mile south of the project site, Yamato Elementary, located 1.6 miles Southeast of the project site and Cressey Elementary School, located 1.6 miles northeast of the project site. Based on the agricultural nature of the project, it is reasonable to conclude that the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials or substances that would have the potential to affect the nearby schools. No impacts are anticipated.
- d.* **No Impact.** The California Department of Toxic Substances Control (DTSC) maintains a Hazardous Waste and Substances Sites List (Cortese List). The Cortese list tracks “Calsites” which are mitigation or brownfield sites subject to Annual Work plans. Backlog or confirmed release sites that are not currently being worked on by DTSC; or both. Before placing a site in the backlog, DTSC ensures that all necessary actions have been taken to protect the public and environment from any immediate hazard posed by the site. The project site is not included in the DTSC Cortese List, and the closest listed site is the Castle Air Force Base, which is located six miles to the east. In addition, a Hazardous Waste and Substance Statement on file with the Merced County Community and Economic Development Department indicates that the site is not included on a list of hazardous materials sites pursuant to Government Code Section 65962.5. No impacts would therefore occur.
- e-f.* **Less Than Significant Impact.** The project site is located approximately five miles south of Turlock Municipal Airport, six miles west of Castle Airport and approximately 12 miles northwest of the Merced Regional Airport, and is not within any adopted airport land use plan or within an airport compatibility zone. The proposed project would result in the development of four agricultural storage and processing buildings approximately 35 feet in height, and the buildings would not be used for habitation. Therefore, the potential for aircraft-related accidents affecting this site or being affected by site development is very low, and the project will have a less than significant impact.
- g.* **Less Than Significant Impact.** The proposed project does not include any modification of existing area roadways or intersections, and the project would not add significant amounts of traffic that would interfere with emergency response or evacuation. Therefore, the proposed project would result in a less than significant impact, and no mitigation would be necessary.
- h.* **No Impact.** The project site is bordered by irrigated agricultural land. Irrigated agricultural land is less susceptible to wildland fires than grazing lands. Orchards and field crops are considered to have minimal fire risk due to the moisture content of the plants. There are no wildlands, as defined in the General Plan, adjacent to the site. According to the General Plan, the project site is located in a Local Response Area (LRA) that is serviced by Merced County Fire Department and in which Fire Hazards are reduced because of fire prevention measures. Therefore, the project would not expose people or structures to significant risks associated with wildland fire, resulting in a less than significant impact.

9. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1,2
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1,2
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1,2
d) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1,2
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
j) Inundation by seiche, tsunami or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1

a, f. Potentially Significant Unless Mitigation Incorporated. The proposed project is not expected to violate any water quality standards or waste discharge requirements, or substantially degrade water quality. The majority of the project site has been previously graded and leveled, and no major grading or earth-moving activities are expected to occur. However, because the proposed project would disturb more than one acre, the applicant would be required to obtain a General

Construction Activity Storm Water Permit from the California State Water Resources Control Board (SWRCB) for storm water discharges associated with construction activities, which would require the implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must contain Best Management Practices (BMPs) to reduce soil erosion and protect storm water runoff. To ensure implementation of storm water requirements and to avoid siltation effects, the following mitigation measure would be required.

Mitigation Measure HYD-1:

The applicant shall be required to submit permit registration documents for the Construction General Permit Order 2009-0009-DWQ to the SWRCB, and comply with all requirements of the permit. The annual fees are based on total disturbed area of the construction project in acres. A Legally Responsible Person (LRP) shall electronically submit Permit Registration Documents (PRD) prior to building permit issuance in the Storm water Multi-Application Report Tracking System. PRDs consist of the Notice of Intent, Risk Assessment, Post-Construction Calculations, a Site Map, the SWPPP, a signed certification statement by the LRP, and the first annual fee. All requirements of the site specific SWPPP shall be included in construction documents for the project.

With implementation of Mitigation Measure HYD-1, the proposed project is not expected to violate any water quality standards or waste discharge requirements. Compliance with applicable requirements would minimize project impacts to water quality. A less than significant impact would result, and no additional mitigation would be necessary.

- b. Less Than Significant Impact.** Based on water usage of similar facilities in the area, approximately 3,700 gallons of groundwater is used daily for facility operations at Livingston Farmers Association. While the proposed project would create 53,000 more square feet of storage and processing space, the amount of sweet potatoes washed and processed by the facility would not increase. Processing almonds does not require water.

The project is required to obtain the necessary public water system permit from SWRCB for use of domestic water supplied to the agricultural facility from two of three existing on-site wells. The facility is required to maintain compliance with a public water system permit as long as 25 or more persons work at the facility during 60 or more days of a calendar year.

Additional agricultural processing buildings and associated paved areas would increase impermeable surface area by approximately three acres. This amount of impermeable surface area would not cause a significant depletion in groundwater recharge. Furthermore, storm water collected from the impermeable surfaces would be directed to an existing storm water basin on the east side of Sultana Drive where water can percolate into the ground. Because the project would not substantially deplete groundwater supplies and storm water would still be allowed to reenter the groundwater system, impact would be less than significant and no mitigation would be required.

- c. Less Than Significant Impact.** The proposed project would alter approximately three acres of previously graded and disturbed land. Construction of the agricultural buildings would result in the generation of a greater storm water runoff quantity than currently exists. Storm water would be directed to an existing storm water basin, which would inhibit any erosion or siltation from occurring on- or off-site. A less than significant impact would result and no mitigation would be required.

- d.* **Less Than Significant Impact.** The facility would be required to meet the drainage standards of the California Building Code and Merced County, and requirements of the California Food and Agriculture to avoid the pooling of water around storage and processing areas. The construction of the proposed agricultural buildings would not alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation, or flooding on- or off-site. A less than significant impact would result and no mitigation would be required.
- e.* **Less Than Significant Impact.** Construction of the proposed project would convert three acres of pervious surfaces to agricultural storage facilities and access drives. Therefore, construction of the proposed plant would result in an increase in impervious areas, and a concurrent increase in storm water runoff.

With project implementation, all storm water would drain to the existing storm water basin. The drainage basin will have sufficient capacity to accommodate the proposed storage facility. During the summer months, the basin can carry a full head of water for irrigation purposes. Further, the storm water drainage basin design must comply with Merced County Department of Public Works requirements as set forth in the Storm Drainage Design Manual. Prior to issuance of building permits, the storm water drainage system would need to be determined adequate for the anticipated storm water flow. Therefore, adequate storm water drainage would be provided for the proposed sweet potato and almond hulling expansion project, a less than significant impact would result, and no mitigation would be required.

- g-i.* **Less Than Significant Impact.** The project site is located within the Federal Emergency Management Agency's (FEMA) Flood Zone X (an area that is determined to be outside the 100 and 500-year floodplains) (FEMA 2008). Therefore, there would be no impact related to 100-year flood hazard areas. The project site is located within an area of possible inundation from dam failure as referenced in the 2000 General Plan Chapter V, Map 13-2. There is a very low probability of such an occurrence, therefore there would be less than significant impact and no mitigation would be necessary.
- j.* **No Impact.** The project site is inland on relatively flat ground and is not threatened by potential seiche, tsunami, or mudflow hazards. No impact is expected, and no mitigation would be necessary.

10. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1,7
b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1,7
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

- a. No Impact.** The proposed project would involve the construction of four new agricultural buildings. The project vicinity consists of agricultural uses. Scattered rural residences associated with agricultural operations are located in the general area; there is no established community in the project area. Because there is no established community in the project area, the proposed project would not divide an established community. No adverse effects would result, and no mitigation would be required.
- b. No Impact.** The proposed project involves a site that is designated Agricultural in the General Plan and zoned A-1 (General Agricultural) in the zoning code. While the proposed project requires a land use permit, the construction and operation of the new agricultural buildings would be a continuation of the existing agricultural support use, and would be consistent with the existing Zoning Code and the 2030 Merced County General Plan. Therefore, the proposed project would not conflict with any applicable land use plan, policy, or regulation. Impacts would be less than significant, and no mitigation would be required.
- c. No Impact.** The project site is not located in an area covered by an adopted Habitat Conservation Plan or Natural Community Conservation Plan; therefore, no conflict with any local conservation program would occur. No significant impact would result, and no mitigation would be required.

11. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1, 2
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1

a,b. No impact. Sand and gravel are the most valuable mineral resource in Merced County. The project site is not located within any sand and gravel resource identified in the General Plan (Open Space and Conservation Element) or the State Mineral Resources Map. Further, no mineral extraction activities exist on the project site and mineral extraction is not included in project designs. No impacts in this regard would occur.

12. NOISE

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
Would the project result in:					
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7
e) For a project located within an airport land use plan area, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area excessive noise levels.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1

Potential noise impacts of the project can be categorized as those resulting from construction and those from operational activities. Construction noise would have a short-term effect; operational noise would continue throughout the lifetime of the project. Development of the proposed project would increase noise levels temporarily during construction. Operational noise associated with the development of the storage facilities would occur when the facility is operating, which would occur during the potato harvesting and almond processing seasons.

Some land uses are considered more sensitive to noise levels than other uses. Sensitive land uses can include residences, schools, nursing homes, hospitals, and some public facilities, such as libraries. Sensitive land uses also may include areas that contain threatened or endangered biological species known to be sensitive to noise.

a-d. Less Than Significant.

Construction Noise

Construction of the proposed agricultural storage and processing facilities would temporarily increase noise levels in the project vicinity during the construction period. Construction is expected to begin immediately upon project approval, and would last intermittently for approximately four years. Construction activities, including site clearing, excavation, grading, building construction, and paving, would be considered an intermittent noise impact throughout the construction period of the project. No construction activities would occur that would generate

groundborne vibration, and activities such as site clearing, grading, and earth-moving activities would be minimal because the majority of the existing site has been previously graded and developed.

Still, the construction activities could result in various effects on sensitive receptors, depending on the presence of intervening barriers or other insulating materials. The County's Noise Ordinance only allows construction activities to occur during weekdays between 7:00 a.m. and 6:00 p.m. Construction activity outside this time period is prohibited (Chapter 10.60.040). These hours are so defined because they include a period of time where noise sensitivity is at its lowest. Therefore, because the construction activity associated with the proposed project would occur during the day and would be consistent with the County's noise ordinance, impacts from construction noise would be less than significant, and no mitigation would be necessary.

e-f. **No Impact.** The project is not located within an airport land use plan area or in the vicinity of a public or private airstrip. The nearest airport (Turlock Municipal Airport) is located approximately five miles north of the project site. The project site is beyond the boundary of the Airport Plan and therefore implementation of the project would neither impact nor be affected by an airstrip. No further evaluation is required.

13. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

a. No Impact. Construction of the proposed agricultural storage and processing facility would not result in population growth. The additional buildings would allow Livingston Farmers Association to increase its storage capacity and better its capabilities to serve as a sweet potato processing plant and almond hulling facility to the existing agricultural market. In addition, there are no off-site improvements associated with the project that would result in population growth. Therefore, implementation of the project would not result in any project-level impacts related to substantial population growth during the short-term construction phase or long-term project operation.

b-c. Less Than Significant Impact. No dwelling units are located on the project site. There are five residences located on adjacent parcels. None of these will be altered as a result of project implementation. Residences in the vicinity are characterized by single family residences on properties in active agricultural use. Therefore, project-level impacts to existing housing would be less than significant and no mitigation would be required.

14. PUBLIC SERVICES

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of					
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1, 2
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1, 2
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

- a. Less Than Significant Impact.** The Merced County Fire Department provides fire suppression and recovery and fire law and code enforcement services for the project area. Station 96, located at 130 C Street in Livingston, (approximately two miles to the southwest), serves the project area. Response times to the project are range from five to eight minutes. The proposed project would convert approximately three acres of agricultural land to light-industrial use. The metal agricultural buildings would be constructed in compliance with local and state fire codes and be used to store large wooden bins of sweet potatoes and almonds. On-site fire protection infrastructure includes a water storage tank and associated diesel pump. As such, an increase in demand for fire services is not expected to result, calls for service would cause only temporary effects, and impact would not result in a notable increase in fire risk and service demand for the area.
- b. Less Than Significant Impact.** Law enforcement services for the project area are provided by the Merced County Sheriff’s Department. The nearest Sheriff’s Community Law Enforcement Office is located at 9481 Shanks Road, Delhi, California, approximately five miles northwest of the project site. Although the type of use proposed does not specifically create an environment generally associated with unlawful activities requiring law enforcement services, the project could have an effect upon local sheriff protection services in the event that such services would be required. This effect would be minor and temporary in nature, therefore impacts concerning law enforcement are considered less than significant.
- c. No Impact.** The proposed project is located within the boundaries of the Merced Unified School District; however, no housing units that have the potential to generate school-age children are proposed. Therefore, the project would not directly create an increased number of school age children for Merced Unified School District. Agricultural support service projects that do include the development of residential units are not required to provide education development fees to the County. Likewise, the jobs that will be provided as a result of the project will be filled with local residents. Impacts in this regard would be less than significant.
- d. Less Than Significant Impact.** The nearest branch of the Merced County Library System is located in Livingston, approximately 2.5 miles southwest of the proposed project. No dwelling

units are included in the proposed project; as a result, no substantial physical impacts associated with the provision of new library services would result. Therefore, impacts in this regard would be less than significant.

- e.* **Less Than Significant Impact.** The Merced County Fire Department provides first responder level Emergency Medical Services, including rescue and extrication, as well as control and mitigation of hazardous materials emergency incidents for the project area. The fire stations are staffed 24 hours a day by a full-time Fire Captain or Fire Apparatus Engineer, and emergency response is augmented with over 325 Paid Call Firefighters (PCFs) volunteers. These PCFs are organized into engine companies by the station's response area with which they reside. The proposed project is located approximately two miles from the nearest Fire Station (Station 96), located at 130 C Street in Livingston. Mercy Hospital, located at 333 Mercy Avenue, Merced, California is the closest medical facility, at approximately 13 miles east from the project site. Likewise, the jobs that will be provided as a result of the project will be filled by local residents. The addition of 45-55 seasonal employees to the Livingston Farmers Association existing work force does not represent a substantial increase in respect to the currently available health services and this impact is therefore less than significant.

15. RECREATION

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Does the project include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

- a.* **No Impact.** The proposed project would add four additional agricultural processing buildings to an existing facility and is not expected to generate a demand for parkland usage. The closest recreational facility is Memorial Park, located in the City of Livingston, approximately 2.5 miles southwest of the project site. This facility is available to serve any recreational needs of the employees. However, no change in the usage of recreational facilities is likely to result from project implementation. Therefore, no project-level impacts to neighborhood or regional parks would result from project implementation.
- b.* **No Impact.** The project does not include a recreational component. In addition, because the project does not propose any residential development, parkland dedication or in-lieu fees in conformance with the Quimby Act will not be required. Therefore, because the project does not propose recreational facilities or require construction or expansion of recreational facilities, no project-level recreational facility-related impacts would occur.

16. TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
f) Conflict with adopted policies, plans or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1

There is one paved driveway apron from Sultana Drive and three from Eucalyptus Avenue that provide access to the project site. Access to the existing storage buildings is provided via paved drive aisles internal to the project site. During the harvest season, truck trips will be made to and from the facility for loading or unloading, and forklifts will be used on-site to move storage bins.

a, b. Less than Significant Impact. At full buildout, trips would remain at an average of approximately 55 truck trips per day for loading or unloading during harvest. After preliminary review from the County Roads Division, it was determined that due to the existing low levels of traffic in the vicinity, and the limited seasonal nature of new trips, the impact to existing levels of service on Eucalyptus Avenue and Sultana Drive would result in less than significant impacts and no additional mitigation would be necessary.

c. No Impact. The proposed project consists of four additional structures approximately 35 feet in height. The proposed project would not affect the air traffic patterns at any of the regional airports. The nearest airport (Turlock Municipal) is located five miles north of the project site.

- d, e.* **Less Than Significant Impact.** According to the Merced County General Plan, freeways and major county roads would be used as primary evacuation routes. No modifications to any existing roadway would be proposed either during project construction or operation. Construction of the proposed agricultural buildings would allow for the access of emergency vehicles and would not increase roadway hazards. In addition, the Merced County Fire Department maintains standards for access roadways to provide for adequate emergency access. Project approval would be subject to site plan review by the Merced County Fire Department.

Therefore, project implementation would not interrupt emergency access to the agricultural facility, and compliance with county roadway and emergency access standards would ensure safety impacts from hazards due to design features are less than significant. No mitigation would be necessary.

- f.* **No Impact.** According to the Merced County General Plan Update Revised Background Report (Figure 6-1), Eucalyptus Avenue and Sultana Drive are unclassified roadways, and neither include infrastructure for bicycles or pedestrians. While “The Bus” provides commuter service to the project area, there are no policies with respect to alternative modes of transportation that have been adopted as part of the 2030 Merced County General Plan that apply to the proposed facility. Therefore, the project would have no effect on alternative modes of transportation, and it would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. No impact would result, and no mitigation would be necessary.

17. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	Reference(s)
a) Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
g) Comply with federal, state and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

a, b, e. Less Than Significant Impact. Water used for the washing and packaging of produce on the project site originates from a private on-site well. While the proposed project would create 53,000 square feet of sweet potato storage space, the amount of sweet potatoes processed by the facility would not increase as a direct result of project implementation. The proposed food processing building would eliminate the need for sweet potatoes to be stored off-site before they are processed and packaged. As such, the proposed project would not cause an increase in the amount of water used to wash and process the sweet potatoes and would not require or result in the construction of new water treatment facilities. Almond processing does not require water, and would not increase the amount of water used at the site.

Employees currently use bathroom facilities at the existing storage facility. Therefore, the proposed project would not exceed wastewater treatment requirements, nor would it result in the

need to construct new wastewater treatment facilities or expand existing facilities, resulting in a less than significant impact, with no mitigation required.

- c. Less Than Significant Impact.** Construction of the proposed project would convert exposed dirt surfaces to four agricultural buildings totaling approximately 113,530 square feet, along with associated concrete drive aisles and loading areas. Therefore, construction of the proposed plant would result in an increase in impervious areas, and a concurrent increase in storm water runoff. Storm water drainage from the project site is routed to a drainage basin located on an adjacent parcel, which would continue with implementation of the project. Compliance with Merced County requirements to manage storm water during project operations would result in the provision of adequate storm water management facilities to maintain runoff volume and water quality. A less than significant impact would occur, and no mitigation would be necessary.
- d. Less Than Significant Impact.** Existing water supply is provided via three existing private water wells. No new entitlements would be required. Based on applicant information and water usage of similar facilities in the area, approximately 3,700 gallons of groundwater is used daily for facility operations at Livingston Farmers Association. While the proposed project would create 53,000 more square feet of storage space, the amount of sweet potatoes washed and processed by the facility would not increase. For these reasons, the expanded potato storage facility would not represent a substantial new demand, and it would not require a new source of water. Impacts would be considered less than significant, and no mitigation would be necessary.
- f. No Impact.** To meet the requirements of the California Integrated Waste Management Act (AB939), the County has adopted a Source Reduction and Recycling programs and Household Hazardous Waste program. The project will generate minor quantities of solid waste. The County of Merced operates two active Class III landfills within the County. The Highway 59 Disposal Site located on Highway 59, north of Merced, would serve the solid waste disposal needs for the proposed project. Highway 59 disposal site is permitted to receive up to 1,500 tons of waste per day although the current average is 769 tons per day. The California Integrated Waste Management Board (CIWMB) has estimated the closure date of Highway 59 site of January 1, 2030. Highway 59 Disposal Site has sufficient landfill capacity to accommodate growth projected in the General Plan. No impact to solid waste disposal systems or to regulatory compliance is expected.
- g. Less Than Significant Impact.** Solid waste disposal must follow the requirements of the contracted waste hauler, which follows federal, state, and local statues and regulations related to collection of solid waste. The proposed project would comply with all State and local waste diversion requirements including the Merced County Solid Waste Management Plan and Merced County Code 18.44 regarding trash and recycling areas. The project will generate minor quantities of solid waste. For this reason, the impact is considered less than significant.

18. MANDATORY FINDINGS OF SIGNIFICANCE

	Yes	No
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>a. As discussed in Section 2.3.4 of this document, the proposed modification would not have substantial impacts on special status species, habitat, or wildlife dispersal and migration. Furthermore, the proposed project would not affect the local, regional, or national populations or ranges of any plant or animal species and would not threaten any plant communities. Similarly, as discussed in Section 2.3.5 of this document, the proposed project would not have substantial impacts on historical, archaeological, or paleontological resources, and thus, would not eliminate any important examples of California history or prehistory. Therefore, the proposed project would not result in a Mandatory Finding of Significance related to impacts on biological or cultural resources.</p>		
<p>b. The proposed modification would not cause impacts that are cumulatively considerable. The project is of limited size and scale and does not have the potential to considerably contribute to any significant cumulative air quality, biological resource, hydrology, water quality, noise, public services, traffic, or utility impacts. Therefore, the proposed project would not result in a Mandatory Finding of Significance related to cumulative impacts.</p>		
<p>c. As discussed in Sections 2.3.3, 2.3.7, 2.3.8, and 2.3.15 of this document, the proposed modification would not expose persons to the hazards of toxic air emissions, chemical or explosive materials, flooding, or transportation hazards. Section 2.3.6 of this document explains that although future development would be exposed to typical northern California earthquake hazards, modern engineering practices would ensure that geologic and seismic conditions would not directly cause substantial adverse effects on humans. In addition, as discussed in Sections 2.3.1 Aesthetics, 2.3.9 Land Use and Planning, 2.3.11 Noise, 2.3.12 Population and Housing, 2.3.13 Public Services, 2.3.14 Recreation, 2.3.15 Transportation/Traffic, and 2.3.16 Utilities and Service Systems, the project would not indirectly cause substantial adverse effects on humans. Therefore, the proposed project would not result in a Mandatory Finding of Significance related to environmental effects that could cause substantial adverse effects on humans.</p>		

Section 3: Environmental Determination

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 2) 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.

Signature: Pam Navares Date: 1-11-19

Printed Name: Pam Navares
Title: Planner II

Community and Economic Development Department
Merced County

Section 4: References

1. County of Merced, 2030 General Plan
2. County of Merced, 2030 General Plan Background Report
3. California Department of Conservation Farmland Mapping and Monitoring Program
4. San Joaquin Valley Air Pollution Control District Particulate Matter Management Plan, 2015 PM2.5 Plan for the 1997 PM2.5 Standard
5. California Department of Fish and Wildlife Threatened and Endangered Species Listing, April 2016
6. California Natural Diversity Database, State of California Fish and Wildlife Department
7. Merced County Zoning Ordinance
8. California Building Code
9. San Joaquin Valley Air Pollution Control District Guidance for Assessing and Mitigating Air Quality Impacts -- March 19, 2015.
10. Merced County Fire Department