

# Proposed Recommendations on Agricultural Burning

(District Project # 20100175)

Initial Study and Draft Negative Declaration

**April 2010** 

# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT GOVERNING BOARD 2009

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#### AIR POLLUTION CONTROL OFFICER

SEYED SADREDIN

### A. PROJECT BACKGROUND INFORMATION

#### 1. Project Title:

Proposed Recommendations on Agricultural Burning

## 2. Lead Agency Name and Address:

San Joaquin Valley Unified Air Pollution Control District 1990 E. Gettysburg Avenue Fresno CA 93726-0244

#### 3. Contact Person:

CEQA:

Mark Montelongo

(559) 230-6000

Planning: Koshoua Thao

(559) 230-6100

#### 4. Project Location:

The proposed recommendations apply to open burning conducted with the exception of prescribed burning and hazard reduction burning as defined in Rule 4106 (Prescribed Burning and Hazard Reduction Burning) in the San Joaquin Valley Air Basin. (See Exhibit 1, Map of District Boundaries)

### 5. Project Sponsor's Name and Address:

San Joaquin Valley Unified Air Pollution Control District 1990 E. Gettysburg Avenue Fresno CA 93726-0244

#### 6. Assessor's Parcel Number:

Not applicable to this project.

#### 7. General Plan Designation/Zoning:

Not applicable to this project.

Exhibit 1
San Joaquin Valley Unified Air Pollution Control District Boundaries



#### 8. Project Description:

In 2003, California state law required the District to regulate open burning for diseased crops, establish best management practices for other weeds and maintenance, and prohibit open burning for several crop categories. In addition to those requirements, California state law authorizes the District to postpone the burn prohibition dates for specific types of agricultural waste material if the District makes three specific determinations and the Air Resources Board concurs. The determinations are: (1) there are no economically feasible alternatives to open-burning that type of material; (2) open-burning that type of material will not cause or substantially contribute to a violation of a National Ambient Air Quality Standard (NAAQS); and (3) there is no long term federal or state funding commitment for the continued operation of biomass facilities in the Valley or the development of alternatives to burning.

District staff has prepared draft *Recommendations on Agricultural Burning Report* (Report) for consideration by the District's Governing Board. The purpose of the Report is to identify economically feasible alternatives to open burning of various agricultural materials and to meet its legal obligation under the California Health & Safety Code (CH&SC). The Report is intended to satisfy the requirements from CH&SC Section 41855.6, by presenting the District's recommended determinations for specified crops and materials, particularly those that don't have an economically feasible alternative to open burning. The proposed recommendations apply to open burning conducted in the San Joaquin Valley Air Basin with the exception of prescribed burning and hazard reduction burning as defined in Rule 4106 (Prescribed Burning and Hazard Reduction Burning).

Adoption of the proposed *Recommendations on Agricultural Burning Report* by the District's Governing Board is a discretionary approval and as such is subject to the provisions of the California Environmental Quality Act (CEQA).

#### 9. Other Agencies Whose Approvals Are Required and Permits Needed:

Adoption of the proposed *Recommendations on Agricultural Burning Report* by the District's Governing Board does not require permits from any agency, however the Air Resources Board must concur with the District's determinations regarding alternatives to open-burning.

#### 10. Name of Person Who Prepared Initial Study:

Mark Montelongo Air Quality Specialist

#### **B. FINDINGS**

District staff has prepared a *Recommendations on Agricultural Burning Report* which considers potential impacts that adoption of the proposed recommendations could have on air quality. Pursuant to CEQA Guidelines §15063(a), District staff prepared an Initial Study for the proposed project, which considers additional environmental impacts. The District finds that there is no substantial evidence, in light of the whole record before the District, that the project may have a significant effect on the environment. District staff has prepared a Draft Negative Declaration for the project. Upon approval of the proposed recommendations by the District's Governing Board, District staff will file a Notice of Determination with each County Clerk within the boundaries of the District, CEQA Guidelines §15075(d).



# C. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

involvi	ng at least one impact that is a "Potentially Significant Impact" or "Potentially Significant Mitigated", as indicated by the checklist on the following pages.						
	Aesthetics						
D. <u>D</u> I	ETERMINATION						
	y that this project was independently reviewed and analyzed and that this document s the independent judgment of the District.						
	I find that the proposed project is exempt from CEQA requirements under Public Resource Code 15061 (b)(3), and a Notice of Exemption has been prepared.						
$\boxtimes$	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 the mitigation measures described on an attached sheet have been added to the project. 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.						
Signa	·						
Printe Title:	d name: David Warner Director of Permit Services						

# E. ENVIRONMENTAL IMPACT CHECKLIST

I. AESTHETICS Would the proposal:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Affect a scenic vista or scenic highway?	•		·	X
<ul> <li>b) Have a demonstrable negative aesthetic effect?</li> </ul>				x
c) Create light or glare?				X
Discussion: Adoption of the proposed Recommendati			eport does not i	mpose
regulatory requirements that would affect aesthetics,	a <u>s identified ab</u>	ove (a-c).		
Mitigation: None		<del>.</del>		
Reference: Supporting Draft Recommendations on A	gricultural Buri	ning Report.	<del></del>	
II. AGRICULTURE RESOURCES	<u>, in table Wall</u>	<u> </u>	<u> </u>	
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland.  Would the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland,	Impaot	Minigatea	Impaot	mpaot
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?				X
<ul> <li>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</li> </ul>				X
<ul> <li>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?</li> </ul>				x
Discussion: Adoption of the proposed Recommenda	ations on Agric	ultural Burning	Report does no	t impose
regulatory requirements that would affect agricultural	•	•	,	
Mitigation: None	<u>,                                      </u>		, ,	
Reference: Supporting Draft Recommendations on A	gricultural Bur	ning Report.	_	
				A 1
III. AIR QUALITY  Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.  Would the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
<ul> <li>a) Conflict with or obstruct implementation of the applicable air quality plan?</li> </ul>				X

	IR QUALITY Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				x
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				X
d)	Expose sensitive receptors to substantial pollutant concentrations?				х
e)	Create objectionable odors affecting a substantial number of people?				x

**Discussion**: The San Joaquin Valley Air Basin is classified as serious for 8-hour ozone nonattainment area and is expected to be classified extreme for particulate matter 2.5 microns in size (PM2.5) nonattainment area for the health-based air quality standards established by the federal Clean Air Act. The serious ozone classification and extreme PM classification are the worst possible categories.

District staff has prepared draft Recommendations on Agricultural Burning Report (Report) for consideration by the District's Governing Board. The purpose of the report is to identify economically feasible alternatives to open burning of various agricultural materials and to meet its legal obligation under the California Health & Safety Code (CH&SC). The report is intended to satisfy the requirements from CH&SC Section 41855.6, by presenting the District's recommended determinations for specified crops and materials, particularly those that don't have an economically feasible alternative to open burning. The proposed recommendations apply to open burning conducted in the San Joaquin Valley Air Basin with the exception of prescribed burning and hazard reduction burning as defined in Rule 4106 (Prescribed Burning and Hazard Reduction Burning).

Proposed recommendations identify biomass facilities and soil incorporation as feasible alternatives to open burning. The identified alternatives have the potential to result in changes in criteria pollutant emissions. District staff has conducted a preliminary assessment on the potential air emissions associated with proposed alternatives. The analysis demonstrates that implementation of the proposed alternatives to open burning will result in annual net emission reductions of 39.2 tons of NOx; 123.1 tons PM2.5; and 105.2 tons VOC. The analysis demonstrates approval of the proposed recommendations would result in a benefit to air quality.

Thus, the District concludes that the proposed amendments would have a positive impact on air quality as identified above (a-e).

Mitigation: None

	OLOGICAL RESOURCES /ould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				x
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				х
_ c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				x
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?				x
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				x
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?				X

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect biological resources, as identified above (a-f).

Mitigation: None

V. CULTURAL RESOURCES  Would the project:		Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?				х
b).	Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?				х
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		_		x
d)	Disturb any human remains, including those interred outside of formal cemeteries?				х

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect cultural resources, as identified above (a-d).

Mitigation: None

	VI. GEOLOGY/SOILS  Would the project:		Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				х
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				x
	ii) Strong seismic ground shaking?				Х
	iii) Seismic-related ground failure, including liquefaction?				Х
	iv) Landslides?				- <b>X</b>
b)	Result in substantial soil erosion or the loss of topsoil?				Х
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?				х

VI. GEOLOGY/SOILS (Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
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?				х
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?				х

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect geology/soils, as identified above (a-e).

Mitigation: None

Reference: Supporting Draft Recommendations on Agricultural Burning Report.

	REENHOUSE GAS EMISSIONS Vould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			x	
b)	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			x	

**Discussion:** Global Climate Change (GCC), which is now generally accepted by the scientific community to be caused by Greenhouse Gases (GHGs), is a widely discussed scientific, economic, and political issue in the United States. Briefly stated, GCC is the cumulative change in the average weather of the earth that may be measured by changes in temperature, precipitation, storms, and wind. GHGs are gases that trap heat in the atmosphere. Some greenhouse gases such as water vapor occur naturally and are emitted to the atmosphere through natural processes as well as through human activities, such as electricity production, vehicle use, etc. The most common GHG that results from human activity is carbon dioxide, followed by methane and nitrous oxide.

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Proposed recommendations identify biomass facilities and soil incorporation as feasible alternatives to open burning. The identified alternatives have the potential to result in changes in GHG emissions because of

possible increased fuel consumption associated with equipment used to grind/chip and transport agricultural biomass. District staff examined the proposed recommendations to determine their potential to have a cumulatively significant impact on global climate change, results of which are presented below. The analysis demonstrates that implementation of the proposed recommended alternatives to open burning will not have a cumulative significant impact on global climate change.

#### Potential Greenhouse Gas Impacts

The primary existing practice for disposing of orchard removal material is to burn it in place (open burning). The proposed alternative to open burning of orchard removal materials is chipping the organic matter and using the chipped material as fuel in a biomass plant to produce electricity. Sources of GHG emissions from this alternative include fuel consumed in chipping the plant material; fuel consumed in transporting the chipped material to a biomass plant; fuel consumed in processing the chipped material at the biomass plant; and combustion of the chipped material to produce electricity at the biomass facility.

Because the current practice is open burning, the alternative practice of burning chipped material in a biomass power plant would not result in an increase in GHG emissions compared to the status quo. In fact, burning the material in a biomass plant would produce a net GHG benefit by producing electric power from a renewable source of energy rather than a fossil fuel. This concept is one of the strategies adopted by the State of California to reduce GHG emissions to 1990 levels by the year 2020 by requiring the state's load serving entities to meet a 33 percent renewable energy target by 2020 (Executive Order S-21-09). Biomass fuels burned in existing facilities are currently transported from various locations outside and within the San Joaquin Valley Air Basin. Use of locally produced fuel could reduce VMT associated with transporting materials, and thus result in a net GHG benefit. GHG emissions associated with chipping orchard removal material are expected to be offset by the benefits associated with displacing fossil fuels and reducing VMT.

The alternative to the open burning of orchard prunings is shredding the material in place and allowing it to remain in the orchard as a land application or mulch. Sources of GHG emissions for this alternative include the fuel consumed to shred the plant material. It is reasonable to conclude, land application of shredded orchard pruning materials will reduce GHG emissions by sequestering some amount of carbon, offsetting any GHG emissions associated with the chipping operation and potentially resulting in a net GHG benefit.

The District concludes, GHG emissions resulting from alternatives to open burning of orchard removal materials and prunings are expected to have a net positive benefit on global climatic change compared to the status quo of open burning. Therefore, the District concludes that implementation of the proposed recommendations would have a less than cumulatively significant impact on global climatic change.

Mitigation: None

		Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			,	x
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?				х
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				· <b>X</b>
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				x
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?				x
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				<b>x</b>
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?				X

Discussion: Adoption of the proposed Recommendations on Agricultural Burning Report does not impose regulatory requirements that would affect hazards and hazardous materials, as identified above (a-h).

Mitigation: None



	PROLOGY/WATER QUALITY  Would the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Violate any water quality standards or waste discharge requirements?			,	x
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
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?				<b>X</b>
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				х
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?				x
f)	Otherwise substantially degrade water quality?				х
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?				х
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				х
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X

regulatory requirements that would affect hydrology/water quality, as identified above (a-i).

Mitigation: None

	ND USE/PLANNING /ould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Physically divide an established community?				Х
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?				х
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?				Х

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect land use/planning as identified above (a-c).

Mitigation: None

Reference: Supporting Draft Recommendations on Agricultural Burning Report.

X		NERAL RESOURCES build the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
	a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				×
	b)	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				х

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect mineral resources, as identified above (a-b).

Mitigation: None

XII. NOISE  Would the project result in:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
<ul> <li>a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</li> </ul>			·	×

XII. No	OISE Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				x
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				х
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				х
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				×
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				x

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect noise, as identified above (a-f).

Mitigation: None

Reference: Supporting Draft Recommendations on Agricultural Burning Report.

	OPULATION/HOUSING ould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				x
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				x
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				x

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect population/housing, as identified above (a-c).

Mitigation: None



XIV. PUBLIC SERVICES  Would the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				x
Fire protection?				Х
Police protection?				X
Schools?				Х
Parks?				Х
Other public facilities?				Х
<ul> <li>b) Cumulatively exceed official regional or local population projections?</li> </ul>				Х
c) Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?				x
d) Displace existing housing, especially affordable housing?				х

Mitigation: None

XV. RECREATION		Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Would the project in existing neighborhood other recreational facults substantial physical facility would occur of the existing substantial physical p	od and regional parks or cilities such that deterioration of the				x
					x

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect recreation, as identified above (a-b).

Mitigation: None

	RANSPORTATION/TRAFFIC  Vould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?				x
b)	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?			·	x
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?				х
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				х
e)	Result in inadequate emergency access?				Х
f)	Result in inadequate parking capacity?				Χ

XVI. TRANSPORTATION/TRAFFIC (Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				х

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect transportation/traffic, as identified above (a-g).

Mitigation: None

	UTILITIES/SERVICE SYSTEMS  Vould the project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				х
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?	·			x
<b>c</b> )	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?				x
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				х
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?				x
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				х

XVII. UTILITIES/SERVICE SYSTEMS (Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
g) Comply with federal, state, and local statutes and regulations related to solid waste?				х

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would affect utilities/service systems, as identified above (a-g).

Mitigation: None

Reference: Supporting Draft Recommendations on Agricultural Burning Report.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				X
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)?				X
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?				х

**Discussion:** Adoption of the proposed *Recommendations on Agricultural Burning Report* does not impose regulatory requirements that would have adverse environmental impacts as identified above (a-c).

Mitigation: None