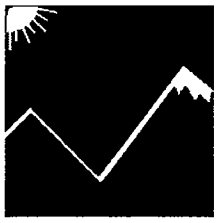

San Joaquin Valley Unified Air Pollution Control District

Sandhu Brothers Farms

Project Number N-1113023

Tracy, California
San Joaquin County

Initial Study and Draft Negative Declaration

September 2011

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT
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SEYED SADREDIN

INITIAL STUDY AND DRAFT NEGATIVE DECLARATION

Sandhu Brothers Farms

(Project N-1113023)

September 2011

Lead Agency:	San Joaquin Valley Air Pollution Control District 1990 East Gettysburg Avenue Fresno CA 93726-0244
Agency CEQA Contact:	Mark Montelongo, Air Quality Specialist Phone: (559) 230-6000 Fax: (559) 230-6061
Agency Permits Contact:	Wai-Man So, Air Quality Engineer Phone: (209) 557-6400 Fax: (209) 557-6475
Project Sponsor and Location:	Sandhu Brothers Farms 31995 South Chrisman Road Tracy, California 95304
Project Contact:	Don Wilkey Phone: (209) 656-0561 Fax: (209) 656-0559
Agency Document Review:	Arnaud Marjollet, Permit Services Manager Daniel Barber Ph.D., Supervising Air Quality Specialist

A. INTRODUCTION

The San Joaquin Valley Unified Air Pollution Control District (District) has received an Authority to Construct (ATC) application from Sandhu Brothers Farms for the installation of a new almond processing facility. This almond processing facility will include one (1) almond pre-cleaning line that served by one (1) dust collector, one (1) almond hulling and shelling line that served by one (1) dust collector, and two (2) almond (in-shell or meats) sorting and packaging lines and an almond meat sizing and packaging line all served by one (1) dust collector.

B. PURPOSE AND AUTHORITY

The District has discretionary approval power over the Project via its Permits Required Rule (Rule 2010) and New and Modified Stationary Source Review Rule (Rule 2201). No other Agency is known to have discretionary approval over the Project. As such, the District is the public agency having principal responsibility for approving the Project and serves as Lead Agency; California Environmental Quality Act (CEQA) Guidelines 15367.

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The ERG was prepared to comply with this requirement and is an internal document used to comply with CEQA.

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Under CEQA the Lead Agency is required to:

- Conduct preliminary reviews to determine if applications are subject to CEQA [CCR §15060].
- Conduct review to determine if projects are exempt from CEQA [CCR §15061].

- Prepare Initial Studies for projects that may have adverse environmental impacts [CCR §15063].
- Determine the significance of the environmental effects caused by the project [CCR §15064]
- Prepare Negative Declarations or Mitigated Negative Declarations for projects with no significant environmental impacts [CCR §15070].
- Prepare, or contract to prepare, EIRs for projects with significant environmental impacts [CCR §15081].
- Adopt reporting or monitoring programs for the changes made to projects or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment [PRC §21081.6 & CCR §15097].
- Comply with CEQA noticing and filing requirements.

Project Description

Sandhu Brothers Farms has proposed to install a new private almond processing facility within an existing forty (40) acre almond orchard that has been actively farmed and cultivated for many years, consistent with current and surrounding land uses. The private almond facility will include one (1) almond pre-cleaning line that is served by one (1) dust collector, one (1) almond hulling and shelling line that will be served by one (1) dust collector, and two (2) almond (in-shell or meats) sorting and packaging lines and an almond meat sizing and packaging line all served by one (1) dust collector. The almond processing will be dry and not require water.

In order to efficiently process harvested crop on-site, the County of San Joaquin has approved construction of a 21,840 square foot building (Building Permit No. 1100719). The County of San Joaquin has considered the project to be a continuation of agricultural use. As a result, operation of the private almond processing facility will take place within this existing building. The almond processing facility will be manned and maintained by existing on-site employees and includes an on-site water well which will be used for bathrooms, employees, and fire protection.

Currently, harvested crop is hauled to be hulled and shelled at the Salida Hulling Association's facility approximately twenty (20) miles away. As a result, the finished product is then shipped fifteen (15) miles to storage and another fifteen (15) miles for boxing and sizing before being shipped to market. The proposed project, will allow Sandhu Brothers Farms to process, store, box and size all harvested crops on-site before shipping to market. Although the project could reduce vehicle miles traveled (VMT), for the purpose of this assessment the District assumes that the amount of vehicle trips would remain status quo since the end product will reach the same destination (market) as currently operating.

Project Construction

Construction consists of the installation of almond processing equipment within an existing building. Construction related activities are short-term and are considered too small to affect overall project related environmental Impacts. Thus, a quantitative analysis of construction related impacts is not included in this assessment.

Process Description

Receiving & Pre-cleaning Operation
The field harvested almonds are delivered to the receiving pit by truck and trailer. The almonds are dumped into the receiving pit hopper. This hopper is closed down to minimum opening and the dust is aspirated to the pre-cleaner dust collector.

The received product is conveyed out of the hopper via a screw conveyor that feeds a totally enclosed vertical bucket elevator, discharging through a leaf aspirator, which removes leaves and light debris and is vented to the pre-cleaner dust collector. The product then falls onto the stick chain. Good product falls through the relatively large hex opening of the conveyor belt. The large debris is discharged onto the stick conveyor and transferred into a stick bunker for later disposal.

The good product, after falling through the stick chain, is conveyed to a vibrating sand screen. The screen captures all fine dirt, sand, etc. and spouts them away via an enclosed dirt conveyor. The good product, "overs", is fed into the enclosed destoner. This machine utilizes the principles of varying shake amplitudes on a screened deck to separate the stones found in the field run product and delivers them to a dirt conveyor.

The good product is then fed onto the shaking "detwigger" deck, conveyed by moving "drag" belts to separate out the small sticks and delivers them to the stick conveyor and onto the stick bunker. The destoner and detwigger discharges are vented to the pre-cleaner dust collector.

The inhull almonds discharge from the detwigger, and are conveyed to at totally enclosed elevator and corresponding screw conveyor to be distributed to any one of the "inhull bins" to await the hulling/shelling process.

The dirt conveyor is aspirated at various locations to eliminate any fugitive dust within the enclosure, and to insure clean piling at the final dirt house.

Hulling & Shelling Operation
Almonds are removed from the storage bins and transferred by conveyor and elevator to the first stage of hulling (split between two shear rolls). All of the shear rolls are designed to separate the first hull (hulling) and then the shell (shelling) from the almond

kernel. The almonds pass from the first stage shear rolls to two aspirators (split flow). The aspirators remove hull and shell from the main product flow. After passing through the aspirators the almonds fall onto a classifying deck wherein almond kernels are removed from the main flow and wherein smaller inshell almonds are separated from the larger inhull almonds. The separated kernels are conveyed to the kernel cleaning area. The larger inhull fraction is conveyed and elevated to the "second stage" of hulling. The smaller inshell fraction bypasses further hulling stages and is conveyed to the first of five stages of shelling.

The larger inhull fraction passes through the "second stage" of hulling shear rolls. Again, after passing through the shear roll the inhull fraction passes through an aspirator and classifying deck. The functions of these machines are the same as that of the identical machines in the first stage of hulling described above. The kernels are conveyed to the kernel cleaning area, the smaller inshell is combined with the smaller inshell from the first stage, and the larger inhull is conveyed to the hulling stage three, which follows the same process as stage two described above. The larger inhull is then conveyed to hulling stage four.

The four stage of hulling once again the product flows through a shear roll. There are no aspirators on this stage so the flow drops directly onto the classifying decks. Stage four hulling decks have a similar function in that they separate meats from larger inshell (and any inhull that is remaining) but they have a different function in that they do not separate larger inhull from smaller inshell, but instead larger hull pieces from inhull/inshell. The hull is removed (scalped) and conveyed to the hull storage area. The large inhull that remains is then sent to hulling stage five which is the same as stage four. Once the product goes through the fifth stage, the inhull/inshell that remains is combined with all inshell from hulling stages one through four and conveyed to shelling stage one.

The inshell almonds now pass through four "stages" of shelling (removal of shell from the kernel). Each "stage" consists of one shear roll and one classifying deck. The shear rolls are calibrated progressively tighter to break the shell away from the kernel with minimal damage to that kernel. Each classifying deck is designed to remove the kernel from the larger inshell. The remaining inshell is conveyed to the next stage of shelling. After passing through the four stages of shelling the shell has been removed from virtually all of the almonds.

All kernels are conveyed to the kernel cleaning area. First the almonds enter an aspirator and classifying deck wherein large hull pieces are removed from whole almonds, and smaller almond and hull pieces are removed from larger whole almonds. The larger hull pieces are conveyed to the hull storage area, the whole almonds (and hull pieces of similar size) pass through an aspirator where further hull removal occurs. After passing through the aspirators the kernels are conveyed to a gravity system for further cleaning.

The gravity system consists of first a gravity separator wherein the whole good almond kernels are separated from whatever hull is left in the product flow. The "bad" cut from the gravity table is conveyed to a classifying deck which is the final mechanical attempt at removing hull and other foreign material from the good almond kernels. The "good" product from the classifying deck is returned to the gravity table. The "bad" product from the classifying deck is conveyed to a final cracker shear roll that is intended to break and remove the shell from very small inshell almonds (pee-wees) that are mixed in with kennels. After passing through this "pee-wees" shear roll the almonds pass through a final classifying deck and aspirator to once again classify hull, whole meats, and meat and hull pieces. The "heavy" cut from the gravity table is sent to the destoner to remove small rock. Rocks are removed and sent to storage bin. The "good" cut from the gravity table and destoner are conveyed to a box out station. This is the end of the hulling/shelling/kernel cleaning process.

All aspirated, shear rolls, gravity separators, accumulators, and various duct control aspiration points are ducted through galvanized pipe to one of the dust collectors. The shell and dirt that are removed from the cloth filter are conveyed to a shell and dirt storage area.

Sorting and Packaging Operation for Box Packaging Line
All cleaned almonds (meats and inshell) will be dumped into a bin hopper. The product is metered across a vibratory pan into an easy lift elevator and then discharged into one of the three chambers of hand sorting tables. At the beginning of the three hand sorting tables, air draws light dust and debris prior to the product being visually inspected. At the end of the tables, the inspected product passes onto a conveyor and into an easy lift elevator. The product is then discharged into the boxing hopper for packaging into boxes and then palletized for shipment. A second box hopper is tied into the line at the easy lift elevator for product that was previously sorted and in storage.

All aspiration points are ducted through galvanized pipe to the dust collector. This dust collector also serves the sorting and bag packaging line and the meat sizing line.

Sorting and Packing Operation for Bag Packaging Line
All cleaned almonds (meats and inshell) will be dumped into a bin hopper. The product is metered across a vibratory pan into an easy lift elevator and then discharged into one of the two chambers of hand sorting tables. At the beginning of the two hand sorting tables, air draws off light dust and debris prior to the product being visually inspected. At the end of the tables, the inspected product passes onto a conveyor and into an easy lift elevator. The product is then discharged into the bagging hopper for packaging into bags and then palletized for shipment.

All aspiration points are ducted through galvanized pipe to the dust collector. This dust collector also serves the sorting and box packaging line and the meat sizing line.

Almond Meat Sizing Operation
The almond meats will be dumped into a bin hopper. The product is metered across a vibratory pan into an easy lift elevator and then discharged onto the seven stage meat sizing deck. The sizing deck is set up to size the almond meats as they pass down the deck. This is done by installing a series of different sized punched holes down the length of the deck. As the almonds pass over these holes and the hole is larger than the almond, the almond drops through the hole and is gathered into a bin of like size almonds. The bin of like size almond meats are then put into storage for shipment, box packaging line, or bag packaging line at a later date.

All aspiration points are ducted through galvanized pipe to the dust collector. This dust collector also serves the sorting and box packaging line and the sorting and bag packaging line.

Project Location

The Project is located at 31995 South Chrisman Road in Tracy, California, which is in the San Joaquin Valley Air Basin (see Figure 1).

General Plan Designation and Zoning

The project site is currently designated in San Joaquin County as Agriculture and is currently zone General Agriculture (AG-40).

Surrounding Land Uses and Setting

The area immediately surrounding the Project is designated as Agriculture and is currently zoned General Agriculture (AG).

The District has verified that the Project is not within 1,000 feet of the school's outer boundary. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to the Project.

Other Public Agencies Whose Approval Is Required

No other agency is known to have discretionary approval over the project.

County of San Joaquin

- On July 29, 2011 the County of San Joaquin-Community Development Department issued Building Permit No. BP-1100719, allowing construction of the 21,840 square foot private almond huller building.

C. DECISION TO PREPARE A NEGATIVE DECLARATION

Consistent with CEQA requirements, the District prepared an Initial Study that evaluated the potential environmental effects of the project. The District finds that the project will have a less than significant impact on the environment. As such, District staff has determined that preparation of a Negative Declaration would be appropriate for the project. Therefore, the District concludes that there is no substantial evidence that the project may have a significant effect on the environment.

Figure 1: The San Joaquin Valley Air Basin

Regional Location within the SJVAB

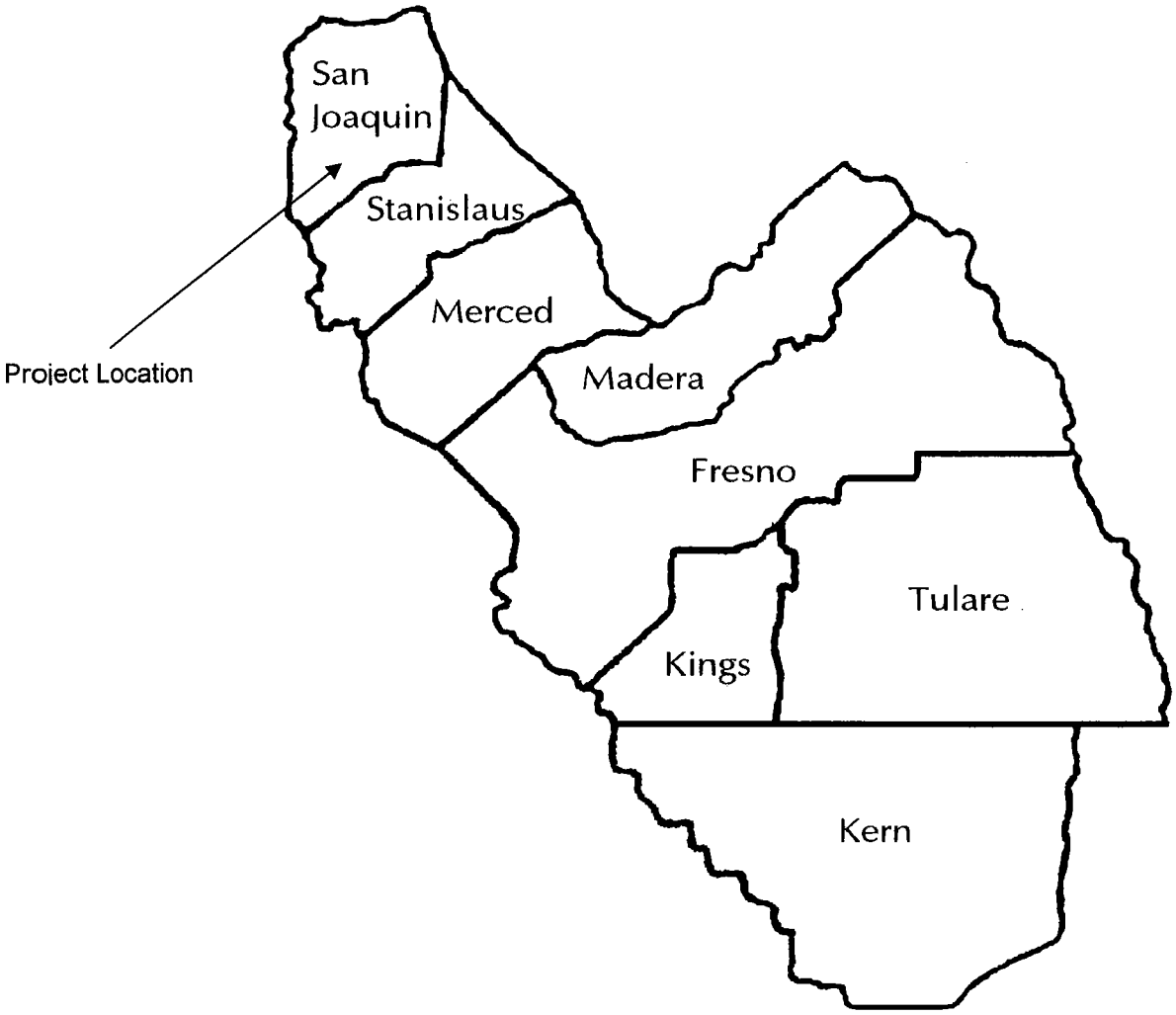
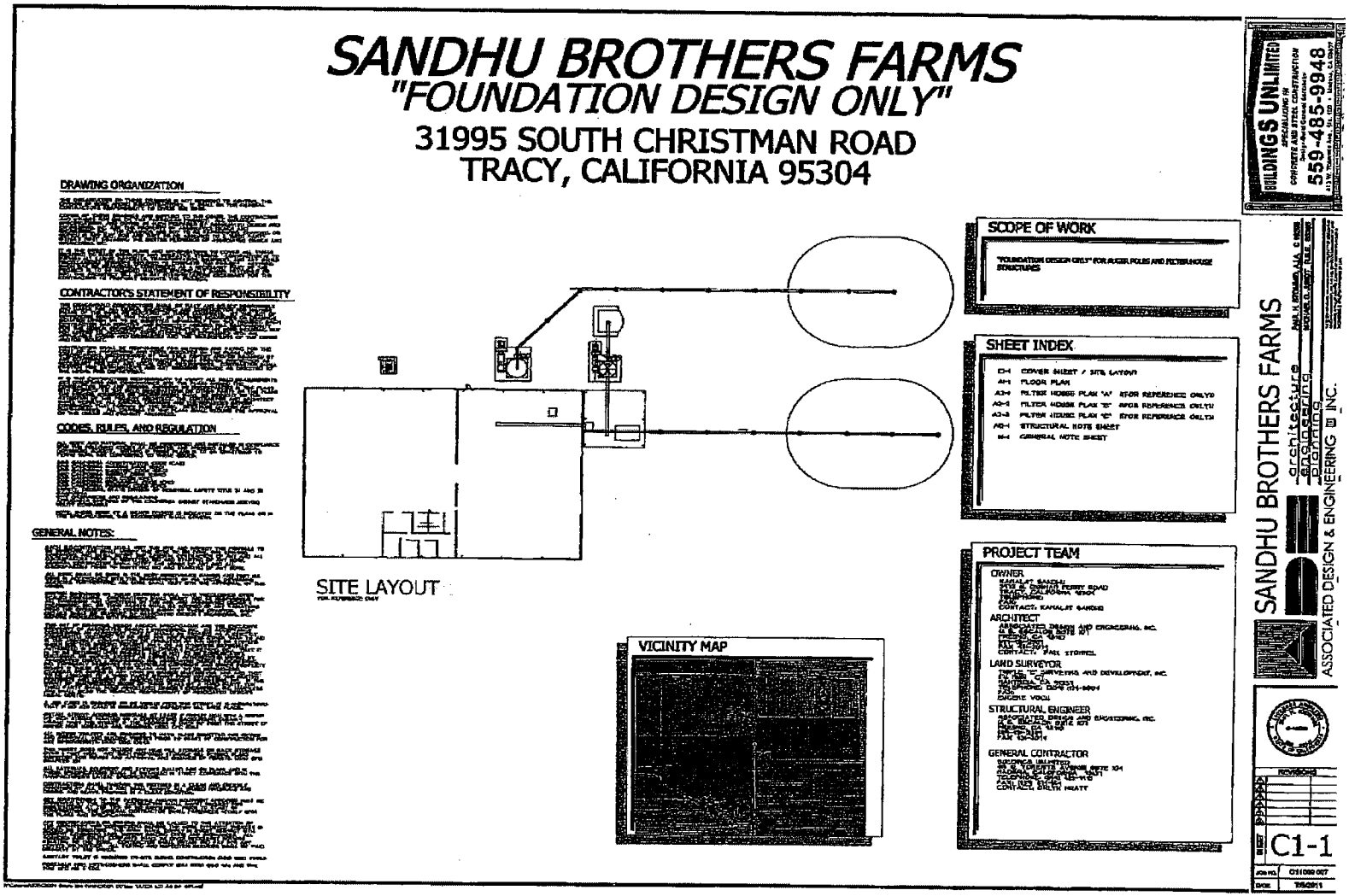


Figure 2: Site Layout



D. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated", as indicated by the checklist on the following pages.

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

E. DETERMINATION

I certify that the Project was independently reviewed and analyzed and that this document reflects the independent judgment of the District.

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

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

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature: _____ Date: SEP 15 2011

Printed name: David Warner
Title: Director of Permit Services

F. ENVIRONMENTAL IMPACT CHECKLIST

I. AESTHETICS **Would the Project:**	**Potentially Significant Impact**	**Potentially Significant Impact Unless Mitigated**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to trees, rock, outcroppings, and historic buildings within a state scenic highway?			X	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-d).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment. Thus, the project will not adversely affect a scenic vista or other visual resources. Therefore, project impacts on aesthetics will be less than significant.

Mitigation: *None required*

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611.

II. AGRICULTURAL RESOURCES	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
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 (1197) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agricultural and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resource Board. 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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220 (g)), timberland (as defined by Public Resource Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-e).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site is currently under an active Williamson Act contract, however, the County of San Joaquin has determined use of the site for farming and processing almonds is considered a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the

existing environment. Therefore, the project will have a less than significant to no impact on agricultural resources.

Mitigation: *None required.*

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011 *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611.

III. AIR QUALITY	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
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:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
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?			X	
e) Create objectionable odors affecting a substantial number of people?				X

Air Quality Plans and Standards (a, b, c)

Conclusion: The Project will have a less than significant to no impact on air quality.

Discussion: The District is tasked with implementing programs and regulations by the Federal Clean Air Act and the California Clean Air Act and has prepared plans to attain federal and state ambient air quality standards. The District has established thresholds of significance for criteria pollutant emissions, which are based on federal offset requirements for stationary sources. The District's thresholds of significance for determining whether project emissions would have a significant adverse impact on air quality are: 10 tons per year (tpy) reactive organic gases (ROG), which includes emissions of volatile organic compounds (VOC); 10 tpy oxides of nitrogen (NOx), and 15 tpy particulate matter smaller than 10 micrometers (PM10).

Stationary sources in the District are subject to some of the most stringent regulatory requirements in the nation. Emission reductions achieved through implementation of federal offset requirements are a major component of the District's air quality plans. For that reason, projects with emissions below the thresholds of significance for criteria pollutants would be determined not to conflict or obstruct implementation of the District's air quality plans.

Project Details

Sandhu Brothers Farms has proposed to install a new private almond processing facility within the existing forty (40) acre almond orchard that has been actively farmed and cultivated for many years. The private almond facility will include one (1) almond pre-cleaning line that is served by one (1) dust collector, and one (1) almond hulling and shelling line that will be served by one (1) dust collector, and two (2) almond (in-shell or meats) sorting and packaging lines and an almond meat sizing and packing line all served by one (1) dust collector.

Construction Emissions

Construction consists of the installation of almond processing equipment within an existing building. Construction related activities are short-term and are considered too small to affect overall project related environmental impacts. Thus, a quantitative analysis of construction related impacts is not included in this assessment.

Operational Emissions

Employees: The Project will be manned and maintained by existing Sandhu Brothers Farms personnel and employees. Therefore, the Project is not expected to result in any new employee based mobile source emissions.

Truck Trips: Currently, harvested crop is hauled to be hulled and shelled at the Salida Hulling Association's facility approximately twenty (20) miles away. As a result, the finished product is then shipped fifteen (15) miles to storage and another fifteen (15) miles for boxing and sizing before being shipped to market. The proposed project, will allow Sandhu Brothers Farms to process, store, box and size all harvested crops on-site before shipping to market. Although the project could reduce vehicle miles traveled (VMT), for the purpose of this assessment the District assumes that the amount of

vehicle trips would remain status quo since the end product will reach the same destination (market) as currently operating. Thus, a quantitative analysis of truck emissions is not included in this assessment.

Stationary Source Emissions: The project consists of installation of a new private almond processing facility. The District has conducted an Engineering Evaluation (EE) for the project, incorporated herein by reference, which demonstrates Particulate Matter 10-microns (PM10) as the only pollutant emitted during almond processing. As such, the EE demonstrates the proposed project would emit 9.658 tons of PM10 per year. As presented in Table 1 – *Operational Emissions*, the proposed project will not equal or exceed the 15 tons per year District Threshold of Significance for PM10 emissions.

Table 1 - Operational Emissions

Project Emissions	**PM10 (tons/year)**
Project Stationary Source Emissions	9.658
Significance Threshold	15.00
Project Equal or Exceed Significance Threshold?	No

Air Quality Plans

As demonstrated above, the project emissions will be below the District's Thresholds of Significance. Thus, the project does not conflict with the implementation strategy of the San Joaquin Valley Regional Air Quality Management Plans (2008 PM 2.5 Plan; 2007 8-Hour Ozone Plan; 2007 PM10 Maintenance Plan; 2006 PM10 SIP; 2004 1-Hour Ozone SIP; 2003 PM10 SIP).

Air Quality Standards

Determination of whether project emissions would violate any ambient air quality standard is largely a function of air quality dispersion modeling. If project emissions would not exceed state and federal ambient air quality standards at the project's property boundaries, the project would be considered to not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Cumulative Impacts

By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development. Future attainment of state and federal ambient air quality standards is a function of successful implementation of the District's attainment plans. Consequently, the District's application of thresholds of significance for criteria pollutants is relevant to the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. If a project's emissions is less than the thresholds of significance for criteria pollutants the project would not be expected to result in a cumulatively considerable net increase of any criteria pollutant for which the District is in

non-attainment under the applicable federal or state ambient air quality standards. As discussed above, Project emissions are below the District's thresholds of significance for criteria pollutant emissions. Therefore, project related emissions would have a less than significant impact on air quality.

Health Risk Impacts

Conclusion: The Project would not expose sensitive receptors to substantial pollutant concentrations.

Discussion: Under the Clean Air Act, toxic air contaminants (TACs) are airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health. Potential health impacts from TACs include long-term health effects such as cancer, birth defects, neurological damage, or genetic damage; or short-term affects such as eye watering, respiratory irritation, throat pain and headaches. TACs may also be referred to as hazardous air pollutants (HAPs). There are currently more than 900 substances classified by the US EPA and California Air Resources Board (ARB) as TACs. Air Quality problems occur when sources of TACs and sensitive receptors are located in proximity to one another.

TACs can be separated into carcinogens and non-carcinogens based on the nature of the physiological degradation associated with exposure to the pollutant. For regulatory purposes, carcinogens are assumed to have no safe threshold below which health impacts would not occur. Cancer risk is expressed as excess cancer cases per one million exposed individuals.

Non-carcinogens differ in that there is generally assumed to be a safe level of exposure below which no negative health impact would occur. These levels are determined on a pollutant-by-pollutant basis. Acute and chronic exposure to non-carcinogens is expressed by using a Hazard Index, which is the ratio of expected exposure levels to acceptable health-acceptable exposure levels.

The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly) was enacted in 1987, and requires stationary sources to report the type and quantities of certain substances routinely released into the air. The goals of AB 2588 are to collect emission data, to identify facilities having localized impacts, to ascertain risks to acceptable levels. AB 2588 requires air districts to establish the prioritization score threshold at which facilities are required to prepare a health risk assessment (HRA). In establishing priorities, an air district must consider potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors, and any other factors that the district determines may indicate that the facility may pose a significant risk.

In implementing its responsibilities under AB 2588, the District Governing Board adopted notification procedures, including prioritization score thresholds, for notifying the public of significant carcinogenic and non-carcinogenic health risks. The District concludes that use of the existing prioritization score thresholds to establish thresholds of significance under CCR §15064.7 is an appropriate and effective means of promoting consistency in significance determinations within the environmental review process. The District's thresholds of significance for determining whether project emissions would expose sensitive receptors to substantial pollutant concentrations are:

- Carcinogens: Probability of contracting cancer for the Maximally Exposed Individual (MEI) exceeds ten (10) in one million.

- Non-Carcinogens: Ground Level concentrations of non-carcinogenic TACs would result in a Hazard Index greater than one (1) for the MEI.

The District has conducted an engineering evaluation for the project, which demonstrates that acute and chronic indices are less than one (1) and the cancer risk with installation of the three dust collectors is greater than 1.0 in a million, but less than 10 in a million. In accordance with the District's Risk Management Policy, the project is approved with Toxic Best Available Control Technology (T-BACT). Therefore, the District concludes that there is no substantial evidence of record to support a conclusion that the project would expose sensitive receptors to significant health risks.

Mitigation: None required.

Odor Impacts

Conclusion: The Project would not create objectionable odor affecting a substantial number of people.

Discussion: Odors can be very unpleasant leading to considerable distress among the public and often generating citizen complaints to local governments and the District. Any project with the potential to frequently expose members of the public to objectionable odors should be deemed to have a significant impact. Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there is no quantitative or formulaic methodologies to determine if potential odors would have a significant impact. Rather, projects must be assessed on a case-by-case basis.

The District's *Guide for Assessing and Mitigating Air Quality Impacts* (GAMAQI) defines a significant odor impact as either more than one (1) confirmed complaint per year averaged over a three year period or three (3) unconfirmed complaints per year averaged over a three year period. A review of the District's compliance complaint database revealed since the Sandhu Brothers Farms is a new permitted facility, no

complaints have been received. Since the project will be operating within existing boundaries of Sandhu Brothers Farms, consistent with current and surrounding land uses, the District concludes there is no substantial evidence of record to support a conclusion that the project would create objectionable odors affecting a substantial number of people.

Mitigation: None required.

References

California Air Resources Board. *AB 2588 Air Toxics "Hot Spots" Program.* Website: http://www.arb.ca.gov/ab2588/ab2588.htm.

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. *Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI).* January 2002. Available at: http://www.valleyair.org/transportation/CEQA%20Rules/GAMAQI%20Jan%202002%20Rev.pdf.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

IV. BIOLOGICAL RESOURCES **Would 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

IV. BIOLOGICAL RESOURCES (Continued)	**Potentially Significant Impact**	**Potentially Significant Impact Unless Mitigated**	**Less Than Significant Impact**	**No Impact**
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?				X
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

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-f).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San

Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment. Thus, the project will not adversely affect endangered species, biological resources, sensitive plant species, federally protected wetlands, native wildlife or conflict with any conservation plans. Therefore, the project will have no impact on biological resources.

Mitigation: None required

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

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?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?				X
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?				X

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-d).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and

farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment. Thus, the project will not adversely affect historical resources, archeological resources, paleontological resources or disturb human remains. Therefore, the project will have no impact on cultural resources.

Mitigation: None required

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

VI. GEOLOGY / SOILS Would the Project	Potentially Significant Impact	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:				
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?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X
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?				X

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?				X
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?				X

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-e).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment. Thus, the project will not expose people to substantial adverse effects resulting from soil erosion, landslides, and ground shaking. Therefore, the project will have no impact on geology/soils.

Mitigation: None required

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

State of California - Department of Conservation. September 2011. *Geological Survey & Earthquake Fault and Zone Maps.* Available at: www.conservation.ca.gov/cgs/Pages/Index.aspx.

VII. GREENHOUSE GAS EMISSIONS Would 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 an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-b).

Discussion: Assembly Bill (AB) 32 was adopted establishing a cap on statewide greenhouse gas (GHG) emissions and sets forth the regulatory framework to achieve the corresponding reduction in statewide emissions levels. In executing its legislative mandate under AB32, the California Air Resources Board (CARB) developed a Scoping Plan. The Scoping Plan contains the main strategies California will use to reduce GHG's from Business-as-Usual (BAU) emissions projected from 2020 levels back down to 1990 levels. Business-as-Usual is the projected emissions in 2020 from the 2002-2004 baseline year, including increases in emissions caused by growth, without any GHG reduction measures. CARB determined that a 29% reduction from BAU is necessary to achieve the 1990 GHG emissions level.

On December 17, 2009, the District adopted a policy *"District Policy – Addressing GHG Emissions Impacts from Stationary Source Projects Under CEQA When Serving as Lead Agency"*. The policy was developed to assist Lead Agencies, project proponents, permit applicants, and interested parties in assessing and reducing the impacts of project specific GHG emissions on global climate change.

The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment.

Construction Related GHG Emissions

Construction consists of the installation of almond processing equipment within an existing building. Construction related activities are short-term and are considered too small to affect overall project related environmental impacts. As such, a quantitative analysis of short-term construction related GHG emissions is not included in this assessment.

Operation Related GHG Emissions

Employees: Existing personnel and employees of Sandhu Brothers Farms will man and maintain the Project. Therefore, no increase in employee related mobile source greenhouse gas emissions is expected. As such, a quantitative analysis of employee related GHG emission is not included in this assessment.

Truck Trips: Currently, harvested crop is hauled to be hulled and shelled at the Salida Hulling Association's facility approximately twenty (20) miles away. As a result, the finished product is then shipped fifteen (15) miles to storage and another fifteen (15) miles for boxing and sizing before being shipped to market. The proposed project, will allow Sandhu Brothers Farms to process, store, box and size all harvested crops on-site before shipping to market. Although the project could reduce vehicle miles traveled (VMT) for the purpose of this assessment the District assumes that the amount of vehicle trips would remain status quo since the end product will reach the same destination (market) as currently operating. As such, a quantitative analysis of trucking related GHG emission is not included in this assessment.

Stationary Sources: The District has conducted an engineering evaluation for the project, which demonstrates that stationary sources permitted by the District would not emit greenhouse gas emissions. Thus, the project would not result in an increase in project specific greenhouse gas emissions. Therefore the District concludes that the project would have a less than cumulatively significant impact on global climate change.

Mitigation: None required

References

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

VIII. HAZARDS & HAZARDOUS MATERIALS Would the Project:	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?				X
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?				X
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?				X
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

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-h).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and

farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use.

The nearest public location is a residence that is over 1,000 feet away from the project site. The nearest school (Jefferson School) is approximately 2.3 miles away from the project site, and the nearest airstrip (Tracy Municipal Airport) is approximately 2.2 miles away. Furthermore, almond processing does not involve the use of hazardous materials. Therefore, the project is expected to have no impacts related to hazards or hazardous materials.

Mitigation: None required

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

IX. HYDROLOGY / 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?				X
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?				X
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?				X
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?				X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X
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
j) Inundation by seiche, tsunami, or mudflow				X

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-j).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment.

Run-off is not considered an issue because of several factors which limit the potential impact. These factors include a relatively flat terrain of the subject site, and relatively low rain fall intensities. Potential areas of flooding have been identified in accordance with the Federal Emergency Management Act. The project site is not located within a recognized flood zone and as such, flooding is not an issue with respect to this project. For any structure resulting from a project, County standards require a review of grading and drainage requirements prior to the issuance of any building permit. The County of San Joaquin has issued a building permit for the proposed project, and has addressed those requirements through the approval process. Currently, the project site has a water well which will be used for bathrooms, employees and fire protection. The almond processing will be dry processing and not require water. Therefore, the District concludes there is no substantial evidence of record to support a conclusion that the project would impact hydrology/water quality.

Mitigation: None required

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

X. LAND USE / PLANNING Would the Project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
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?				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-c).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment. Thus, the project will not divide an established community, conflict with any applicable land use or habitat conservation plans. Therefore, the project will have no impact on land use/planning.

Mitigation: None required

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

XI. MINERAL RESOURCES Would 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?				X
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?				X

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-b).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment. Thus, the project will not adversely affect mineral resources of value on the project site. Therefore, the project will have no impact on mineral resources.

Mitigation: None required

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

State of California – Department of Conservation. September 2011. *California Geological Survey.* Available at: www.conservation.ca.gov/cgs/Pages/Index.aspx.

XII. NOISE Would the Project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
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?				X
d) A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?				X
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?				X
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

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-f).

Discussion: The project is within the existing boundaries of Sandhu Brothers Farms, consistent with current operations and surrounding land uses. The project is located on a forty (40) acre site, which has farmed and cultivated almonds for many years. The nearest public location is a residence that is over 1,000 feet away from the project site. The nearest school (Jefferson School) is approximately 2.3 miles away from the project site, and the nearest airstrip (Tracy Municipal Airport) is approximately 2.2 miles away.

Construction consists of the installation of almond processing equipment within an existing building. These activities could temporarily increase ambient noise levels, however, a standard condition of approval restricting the hours of construction is covered in Building Permit No. 1100719, issued by San Joaquin County. Operations of the project will also result in increased ambient noise levels. To reduce potential noise impacts resulting from operations, the project will comply with San Joaquin County established Development Regulations – Performance Standards for stationary source noise impacts (Division 10: Development Regulations – Chapter 9-1025). Compliance

with established County noise regulations and conditions of approval is considered sufficient to ensure that noise impacts would not be significant. Therefore, the District concludes there is no substantial evidence of record to support a conclusion that noise would have a significant impact.

Mitigation: None required

References

John Funderburg, San Joaquin County Principal Planner. September 2011. *Telephone Correspondence.*

San Joaquin County. *Title 9 Development Title of San Joaquin County, Division 10: Development Regulations.* Available at: http://www.sjgov.org/commdev/cgi-bin/cdyn.exe?grp=planning&htm=developmenttitle9.

San Joaquin Valley Air Pollution Control District. August 2011 *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

XIII. POPULATION / HOUSING Would 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

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-c).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and

farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Existing personnel and employees of Sandhu Brothers Farms will man and maintain the Project. As such, the project is not growth inducing and will not adversely affect housing or population growth in the area. Therefore, the project will have no impact on population/housing.

Mitigation: None required

Reference

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS)*. Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011 *Authority to Construct: Application Review*; Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

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:				
i) Fire protection?				X
ii) Police protection?				X
iii) Schools?				X
iv) Parks?				X
v) Other public facilities?				X

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above.

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located

within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Existing personnel and employees of Sandhu Brothers Farms will man and maintain the Project. As a result, the project is not growth inducing and will not change the use of existing facilities. Therefore, the project will not adversely affect or require additional demand of fire protection, police protection, schools, parks, or other public services.

Mitigation: None required

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

XV. RECREATION Would the Project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-b).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved

by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Existing personnel and employees of Sandhu Brothers Farms will man and maintain the Project. As a result, the project is not growth inducing and will not change the use of existing facilities. Thus, the project will not result in additional demands for parks or recreational facilities. Therefore, the project will have no impact on recreation.

Mitigation: None required

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011. *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

XVI. TRANSPORTATION / TRAFFIC Would the Project:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation systems, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				X

XVI. TRANSPORTATION / TRAFFIC (Continued)	Potentially Significant Impact	Potentially Significant Impact Unless Mitigated	Less Than Significant Impact	No Impact
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				X
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e) Result in inadequate emergency access?				X
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				X

Conclusion: There is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-f).

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment.

Currently, harvested crop is hauled to be hulled and shelled at the Salida Hulling Association's facility approximately twenty (20) miles away. As a result, the finished product is then shipped fifteen (15) miles to storage and another fifteen (15) miles for

boxing and sizing before being shipped to market. The proposed project, will allow Sandhu Brothers Farms to process, store, box and size all harvested crops on-site before shipping to market. Although the project could reduce vehicle miles traveled (VMT), for the purpose of this assessment the District assumes that the vehicle trips would remain status quo since the end project will reach the same destination (market) as currently operating. Existing personnel and employees of Sandhu Brothers Farms will man and maintain the project. As such, the project is not growth inducing and will not substantially increase traffic in the area. Therefore the project will have no impact on transportation/traffic.

Mitigation: None required

References

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

San Joaquin Valley Air Pollution Control District. August 2011 *Authority to Construct: Application Review*, Application No. N-8613-1-0 through -5-0, Project No. N-1113023. Available at San Joaquin Valley Air Pollution Control District, 1990 East Gettysburg Avenue, Fresno, CA 93611

XVII. UTILITIES / SERVICE SYSTEMS Would 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?				X
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
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?				X

XVII. Utilities / Service Systems (Continued) **Would the Project:**	**Potentially Significant Impact**	**Potentially Significant Impact Unless Mitigated**	**Less Than Significant Impact**	**No Impact**
d) Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?				X
e) Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?				X
f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?				X
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X

Conclusion: The almond processing will be dry and not require water. However, the project has a well on-site which is used for bathrooms, employees and fire protection. The project will have sufficient water supplies and new or expanded entitlements are not required.

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment. Therefore, the District concludes that there is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-g)

Mitigation: None required

References

Don Wilkey, Consultant for Sandhu Brothers Farms. *Electronic Correspondence.* September 2011.

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XVIII. MANDATORY FINDINGS OF SIGNIFICANCE Would the Project	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?			X	

Impacts on the Environment

Conclusion: The Project will have a less than significant impact to no impact on the environment.

Discussion: The project consists of the installation and operation of a private almond processing facility within an existing building. Construction of the building was approved by the County of San Joaquin, (Building Permit No. 1100719). The project site is located within the existing operating boundaries of Sandhu Brothers Farms, and is consistent with current and surrounding land uses. This forty (40) acre site has been cultivated and farmed for many years, and as such, the project is considered by the County of San Joaquin to be a continuation of agricultural use. Issuance of District air permits would not impose conditions altering the existing environment. Therefore, the District concludes that there is no substantial evidence of record to support a conclusion that the Project would have a detrimental impact on environmental resources identified above (a-c).

References

County of San Joaquin. September 2011. *San Joaquin County Geographic Information Systems (GIS).* Available at: www.sjmap.org.

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