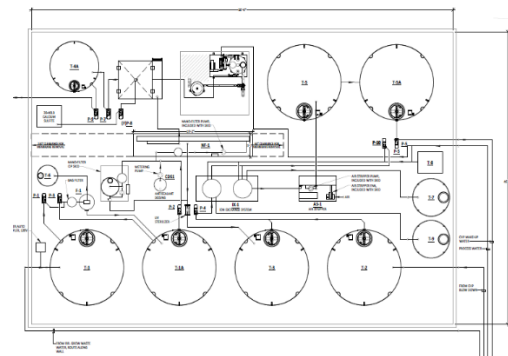


Public Review Draft
Initial Study/Mitigated Negative Declaration

Vertis Process Water Treatment Plant

Conditional Use Permit (CUP25-000003)
(An Amendment to Original CUP2017-003)

June 5, 2025



Prepared by
EMC Planning Group

PROPOSED MITIGATED NEGATIVE DECLARATION

VERTIS
PROCESS WATER TREATMENT PLANT

CONDITIONAL USE PERMIT (CUP25-000003)
(AN AMENDMENT TO ORIGINAL CUP2017-003)

PREPARED FOR

City of King

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June 5, 2025

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PROPOSED MITIGATED NEGATIVE DECLARATION

In Compliance with the California Environmental Quality Act (CEQA)

Project Name	Vertis Process Water Treatment Plant Conditional Use Permit (CUP) Amendment Case No. CUP25-000003 (An amendment to original CUP2017-003)
Lead Agency	City of King
Project Proponent	Vertis 100 Don Bates Way King City, CA 93930
Project Location	100 Don Bates Way King City, CA 93930 APN: 026-521-010
Project Description	<p>The current site operator and applicant, Vertis, proposes to implement and construct a proprietary water treatment plant as designed by Tailwater Systems. The treatment system (referred to as “AquaReclaim”) is designed to collect and treat irrigation drain water from cannabis growing operations. The “AquaReclaim” process is a scalable and comprehensive process that enables cannabis growers to reuse their high effluent electrocoagulation (Ec) drainage and process water. The “AquaReclaim” treatment system will treat the cooling water blowdown from the onsite combined heat and power (CHP) systems contained within the existing Phase I CHP Plant located to the east of the proposed water treatment plant site. The resulting treated water will be used to supplement and enhance the existing onsite CHP system. No storage of wastewater generated by the plant is planned. During backwash (every three to four days), a portable cart is brought out with a five (5) micron filter and 10-micron granular activated carbon (GAC) filter per the manufacturer instructions. A temporary layflat hose connects the filtered backwash output. The applicant will use the existing sewer connection located at the northeast corner of the existing CHP facility. A layflat hose will be manually connected, as needed, allowing treated water to flow through the existing metered connection to the sanitary sewer. No additional sewer modifications are planned or needed for this project. The system does not process any human waste.</p>

Treated water flow to the sewer connection is not anticipated during normal operation. This will be done manually using the existing metered/sampled connection. The proposed project includes the installation of tanks, ion/manganese filter, nanofiltration, ion exchange, clarifier, and various chemical feeders, waste collection, piping, and pumps to create the complete treatment system.

The water treatment plant site would consist of a 4,500-square-foot evaporation site and a 4,000-square-foot equipment pad located at the far northwestern corner of the project parcel. The project site sits south of Airport Road, which forms the northern boundary of the project site. No existing trees or vegetation will require removal as part of the proposed project. The proposed project would require approval of a conditional use permit (CUP) to allow for proposed uses, and is currently in progress. Grading at the project site would be minimal, if any, and limited to leveling the surface for proper drainage. This may involve removing grass and installing a pond liner. The proposed project is not expected to require any new employees.

Public Review Period

Begins – Wednesday, June 11, 2025
Ends – Friday, July 11, 2025

Written Comments To

City of King
Doreen Liberto, AICP, MDR
Community Development Director
212 South Vanderhurst Ave
Email: dliberto@kingcity.com

Proposed Findings

The City of King is the custodian of the documents and other material that constitute the record of proceedings upon which this decision is based.

The initial study indicates that the proposed project has the potential to result in significant adverse environmental impacts. However, the mitigation measures identified in the initial study would reduce the impacts to a less than significant level. There is no substantial evidence, in light of the whole record before the lead agency, City of King, that the project, with mitigation measures incorporated, may have a significant effect on the environment. See the following project-specific mitigation measures:

Mitigation Measures

Biological Resources

- BIO-1. To avoid impacts to nesting birds during the nesting season (January 15 through September 15), all construction activities should be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction or project-related work is scheduled during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct nesting bird surveys.
- a. Two surveys for active bird nests will occur within 14 days prior to start of ground disturbance, with the final survey conducted within 48 hours prior to ground disturbance. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. If no nesting birds are found, a letter report confirming absence will be prepared and submitted to the King City Community Development Department and no further mitigation is required.
 - b. If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize “normal” bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Once the absence of nesting birds has been confirmed, a letter report will be prepared and submitted to the King City Community Development Department.

Hydrology and Water Quality

HYD-1. Prior to issuance of any building permits, the applicant shall:

1. Remedy the existing wastewater discharge violation on record with the City of King Public Works Department to the satisfaction of the City of King Public Works Director.

2. The applicant shall obtain an industrial wastewater discharge permit from the City of King Public Works Department and shall adhere to the City of King's industrial wastewater discharge permit requirements for the duration of the permit approval. The applicant shall submit quarterly wastewater discharge reports to the Public Works Department which shall document compliance with all applicable industrial wastewater discharge permit requirements.

HYD-2. Prior to issuance of a grading permit, the applicant shall prepare a drainage plan that complies with the Monterey Regional Storm Water Management Best Management Practices and standards established for compliance with non-point discharge emissions for storm water. The drainage plan shall incorporate Low Impact Development Strategies and Best Management Practices to reduce storm water runoff, encourage infiltration, and reduce pollutant transmission. The drainage plan shall be subject to review and approval by the city and be implemented with development of the project.

PUBLIC REVIEW DRAFT INITIAL STUDY

VERTIS
PROCESS WATER TREATMENT PLANT

CONDITIONAL USE PERMIT (CUP25-000003)
(AN AMENDMENT TO ORIGINAL CUP2017-003)

PREPARED FOR

City of King

Doreen Liberto, AICP, MDR, Community Development Director

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June 5, 2025

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TABLE OF CONTENTS

A.	BACKGROUND.....	1
B.	ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED.....	15
C.	DETERMINATION.....	16
D.	EVALUATION OF ENVIRONMENTAL IMPACTS	17
1.	Aesthetics	19
2.	Agriculture and Forest Resources.....	21
3.	Air Quality.....	23
4.	Biological Resources	28
5.	Cultural Resources	34
6.	Energy.....	36
7.	Geology and Soils	38
8.	Greenhouse Gas Emissions	41
9.	Hazards and Hazardous Materials.....	43
10.	Hydrology and Water Quality	46
11.	Land Use and Planning	50
12.	Mineral Resources.....	51
13.	Noise.....	52
14.	Population and Housing.....	54
15.	Public Services.....	55
16.	Recreation	56
17.	Transportation.....	57
18.	Tribal Cultural Resources	59
19.	Utilities and Service Systems	61
20.	Wildfire	63
21.	Mandatory Findings of Significance.....	65
E.	SOURCES.....	67

Appendices

Appendix A	Project Plans
Appendix B	California Emission Estimation Modeling (CalEEMod) 2022.1
Appendix C	Special-Status Species with Potential to Occur in the Project Vicinity
Appendix D	City of King Standard Conditions of Approval for Cultural Resources

Figures

Figure 1	Project Location Map.....	5
Figure 2	Aerial Photograph.....	7
Figure 3	Site Photographs.....	9
Figure 4	Comprehensive Site Plan.....	11
Figure 5	Site Plan Illustrating Planned Evaporation Site and Equipment Pad.....	13
Figure 6	Special-Status Species in the Project Vicinity.....	31

Tables

Table 1	Project Characteristics.....	26
Table 2	Unmitigated Operational Criteria Air Pollutant Emissions.....	26
Table 3	Projected Annual GHG Emissions	42

A. BACKGROUND

Project Title	Vertis Process Water Treatment Plant Conditional Use Permit (CUP) Amendment Case No. CUP25-000003 (An Amendment to Original CUP CUP2017-003)
Lead Agency Contact Person and Phone Number	City of King Doreen Liberto, AICP, MDR Community Development Director 831-385-3281
Date Prepared	June 5, 2025
Study Prepared by	EMC Planning Group Inc. 601 Abrego Street Monterey, CA 93940
Project Location	100 Don Bates Way King City, CA 93930 APN: 026-521-010
Project Sponsor Name and Address	Vertis 100 Don Bates Way King City, CA 93930
General Plan Designation	Light Industrial (LI)
Zoning	Light Manufacturing (M-1) (East Ranch Business Park Specific Plan)

Setting

The approximately 1.3-acre project site is located on the far northwestern corner of a larger 19.73-acre parcel (APN: 026-521-010) which is located at the end of a cul-de-sac at 100 Don Bates Way within the City of King’s “East Ranch Business Specific Plan” area (specific plan area). The project site is bordered to the north by Airport Road and the Mesa Del Rey Airport to the north/northeast. An electric power station and transfer station operated by Calpine is located to the west; a bus depot and administrative office for Monterey-Salinas Transit District (MST) to the south/southwest; and a greenhouse facility to the south/southeast. An agricultural packing and distribution center operated by Braga Fresh and Rava Ranches, Inc. is located across Airport Road to the northwest.

Figure 1, [Location Map](#), presents the regional and vicinity location of the project site. Figure 2, [Aerial Photograph](#), presents an aerial view of the project site and immediate surroundings. Figure 3, [Site Photographs](#), presents photographs taken at the project site in November 2024.

The project site has a *King City General Plan* (hereinafter “general plan”) land use designation of “Light Industrial (LI)” and an *East Ranch Business Park Specific Plan* (hereinafter “specific plan”) zoning designation of “Light Manufacturing (M-1).” According to the specific plan document, the East Ranch Business Park consists of approximately 107 acres of industrial and related uses located northeast of downtown King City. The processing and transporting of agriculture is based in this area along with other light industrial uses and utility facilities. The specific plan provides an area of larger land parcels with enhanced aesthetic standards exclusively for sound industrial development. Manufacturing and other industries are permitted in the East Ranch Business Park and operate away from the restricting influences of non-industrial uses, while maintaining an environment free from offensive or objectionable noise, dust, odor or other nuisances.

Existing uses on the project site include a 400,320 square foot industrial warehouse building that was built in 1997 according to the Monterey County Assessor’s Office. A small water treatment facility also exists on the property, located northeast of the full facility.

Description of Project

Background/Previous Project Site Approvals and CEQA Review

On September 27, 2016 the Planning Commission approved Ordinances 2016- 728, 729 and 730, amending Municipal Section 17.03 of the Zoning Code to allow Medical Cannabis cultivation, nursery, manufacturing and testing uses (Types 2A, 2B, 3A, 3B, 4, 6 and 8.) The City’s M-1, M-2 and M-3 zoning districts and the specific plan were amended at that time to allow the uses in those specific zoning districts.

The project site was previously the subject of an August 2016 CEQA initial study/mitigated negative declaration (IS/MND) prepared by Douglas Wood & Associates, Inc. on behalf of the City. The IS/MND evaluated proposed zoning code amendments to further design and regulate facilities associated with medical cannabis cultivation, manufacturing and testing. The IS/MND also evaluated the probable environmental impacts as a result of estimated development of medical cannabis facilities throughout the City. Potentially significant environmental impacts were identified which required adoption of mitigation measures associated with the following environmental issues: aesthetics, air quality, cultural resources, geology/soils, hazards/hazardous materials, hydrology/water quality, noise, public services, transportation/circulation, and utility/service systems. The MND was adopted by the Planning Commission on September 27, 2016 at the time that the change to the Zoning Code was approved.

In 2017, a conditional use permit application (CUP 2017-003) was submitted by the previous operator of the on-site facility (Cal Grow) to renovate approximately 159,000 square feet of the existing 400,320 square foot structure in the first phase followed by renovation of the remainder of the warehouse structure in phase two. The proposed uses include four Cannabis Use types Cultivation (and processing) (CA Type 3A), Nursery (CA Type 4) Manufacturing Level 2 (CA Type 7), and Distribution (CA Type 11).

On July 24, 2018, Cal Grow renewed an application to allow the following Commercial Cannabis Uses: Cultivation (CA Type 28); Nursery (CA Type 4); Manufacturing Level 2, (CA Type 7); and Distribution and Transportation (CA Type 11). Staff review of the proposed use and its impacts indicates that the use as proposed was consistent with the evaluation and findings of the previously adopted 2016 MND with no potentially significant impacts. Being contained within an existing structure the then proposed project was therefore deemed exempt by the City from additional CEQA review per CEQA Guidelines §15332 (infill development projects) and a conditional use permit (CUP 2017-003) was approved on August 21, 2018.

Currently Proposed Project

The current site operator and applicant, Vertis, proposes to implement and construct a proprietary water treatment plant as designed by Tailwater Systems. The treatment system (referred to as “AquaReclaim”) is designed to collect and treat irrigation drain water from cannabis growing operations. The “AquaReclaim” process is a scalable and comprehensive process that enables cannabis growers to reuse their high effluent electrocoagulation (Ec) drainage and process water. The “AquaReclaim” treatment system will treat the cooling water blowdown from the onsite combined heat and power (CHP) systems contained within the existing Phase I CHP Plant located to the east of the proposed water treatment plant site. The resulting treated water will be used to supplement and enhance the existing onsite CHP system. No storage of wastewater generated by the plant is planned. During backwash (every three to four days), a portable cart is brought out with a five (5) micron filter and 10-micron granular activated carbon (GAC) filter per the manufacturer instructions. A temporary layflat hose connects the filtered backwash output. The applicant will use the existing sewer connection located at the northeast corner of the existing CHP facility. A layflat hose will be manually connected, as needed, allowing treated water to flow through the existing metered connection to the sanitary sewer. No additional sewer modifications are planned or needed for this project. The system does not process any human waste. Treated water flow to the sewer connection is not anticipated during normal operation. This will be done manually using the existing metered/sampled connection. The proposed project includes the installation of tanks, ion/manganese filter, nanofiltration, ion exchange, clarifier, and various chemical feeders, waste collection, piping, and pumps to create the complete treatment system.

Physical improvements are identified in [Figure 4, Comprehensive Site Plan](#), and [Figure 5, Site Plan Illustrating Planned Evaporation Site and Equipment Pad](#). The water treatment plant site would consist of a 4,500-square-foot evaporation site and a 4,000-square-foot equipment pad located at the far northwestern corner of the project parcel. A comprehensive project plan package is included as [Appendix A](#). The project site sits south of Airport Road, which forms the northern boundary of the project site. No existing trees or vegetation will require removal as part of the proposed project. The proposed project would require approval of a conditional use permit (CUP) to allow for proposed uses, and is currently in progress. Grading at the project site would be minimal, if any, and limited to leveling the surface for proper drainage. This may involve removing grass and installing a pond liner. The proposed project is not expected to require any new employees.

Other Public Agencies Whose Approval is Required

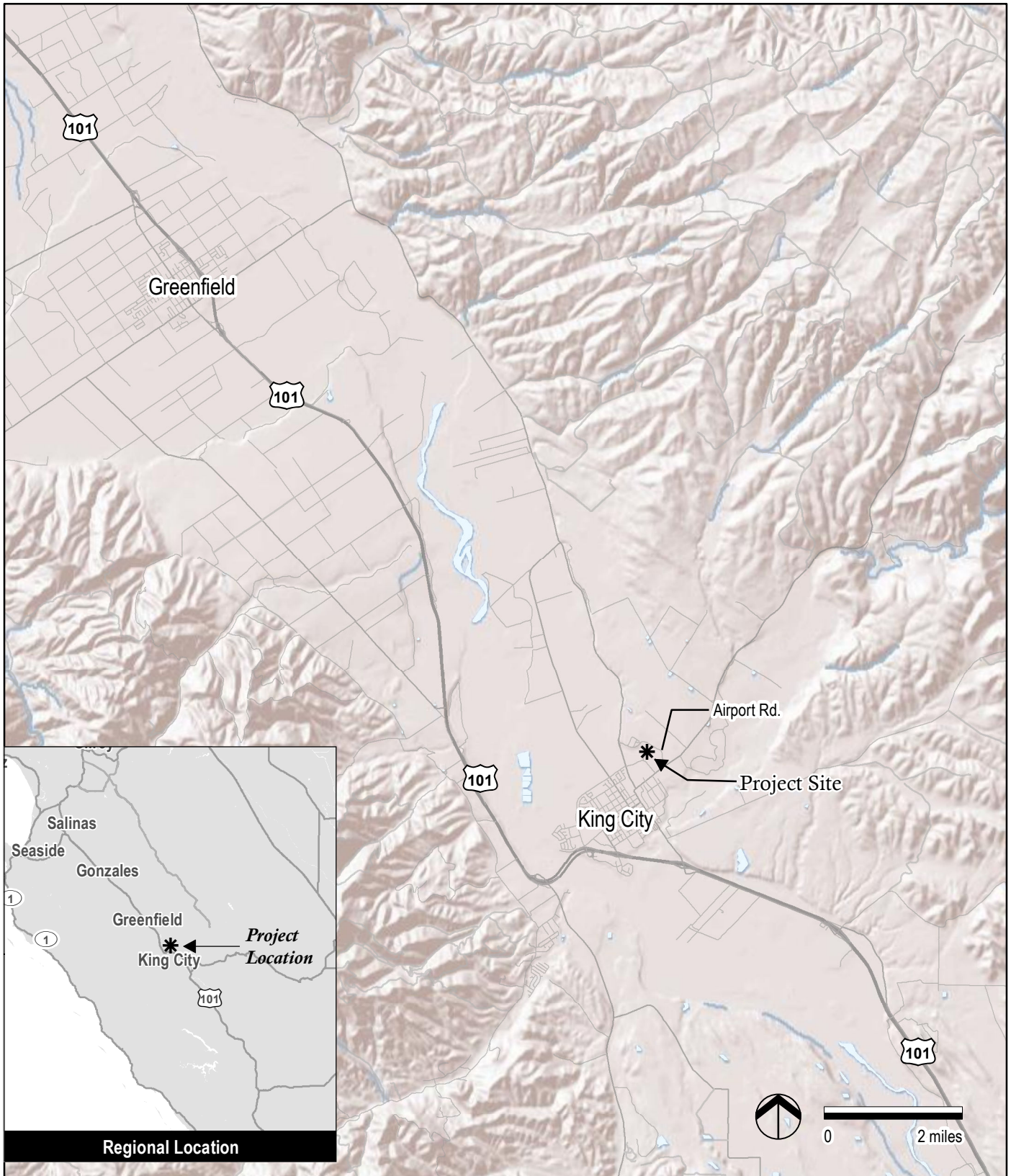
- Central Coast Regional Water Quality Control Board (Cannabis General Order)

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

On November 4, 2024, the City sent out consultation offer letters pursuant to the requirements of Assembly (AB) 52 (Public Resources Code section 21080.3.1) to the Xolon Salinan Tribe and the Salinan Tribe of Monterey & San Luis Obispo Counties. On December 4, 2024, the Salinan Tribe of Monterey & San Luis Obispo Counties responded to the City's consultation offer letter, indicating concerns that cultural resources may be impacted by the project (Patti Dunton, Administrator, email dated December 4, 2024). The tribe requested that all ground disturbing activities be monitored by a cultural resource specialist from the tribe. The City currently has standard conditions of approval associated with cultural resources. These standard conditions of approval identify pre-construction requirements, discovery of cultural resource requirements, and tribal monitoring requirements. The City's standard conditions of approval associated with cultural resources are adequate to address the project's potential to cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074. Compliance with the City's standard conditions of approval would ensure no adverse impacts to tribal cultural resources would result from construction of the proposed project. The City followed up with the tribe on June 2, 2025 and has not received a response as of June 5, 2025.

No other responses to the City's consultation offer letters have been received as of June 5, 2025.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.



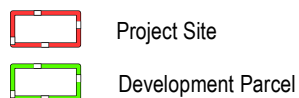
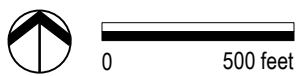
Source: ESRI 2024

Figure 1
Project Location Map

Vertis Process Water Treatment Plant IS/MND



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Source: Monterey County GIS 2024, Google Earth 2024

Figure 2

Aerial Photograph



Vertis Process Water Treatment Plant IS/MND

This side intentionally left blank.



① View of project site looking southeast.



② View of project site looking northwest.



③ View of existing warehouse facility on project site looking southwest.



Development Parcel

Source: Google Earth 2024
Photographs: EMC Planning Group 2024



④ View of project site looking northeast.



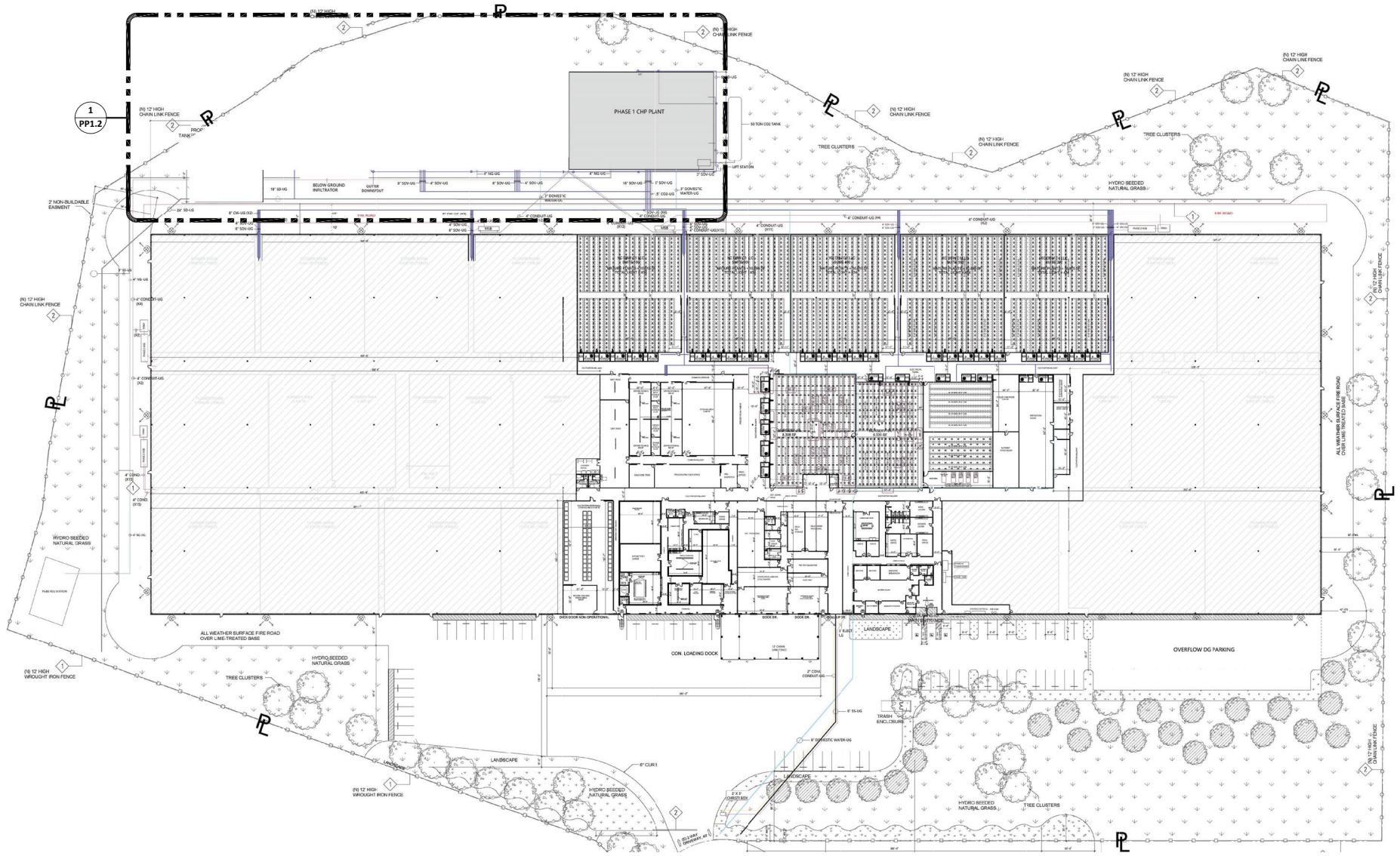
⑤ View of existing water process facility on project site looking southeast.



⑥ View of project site looking northeast.

Figure 3 Site Photographs

This side intentionally left blank.



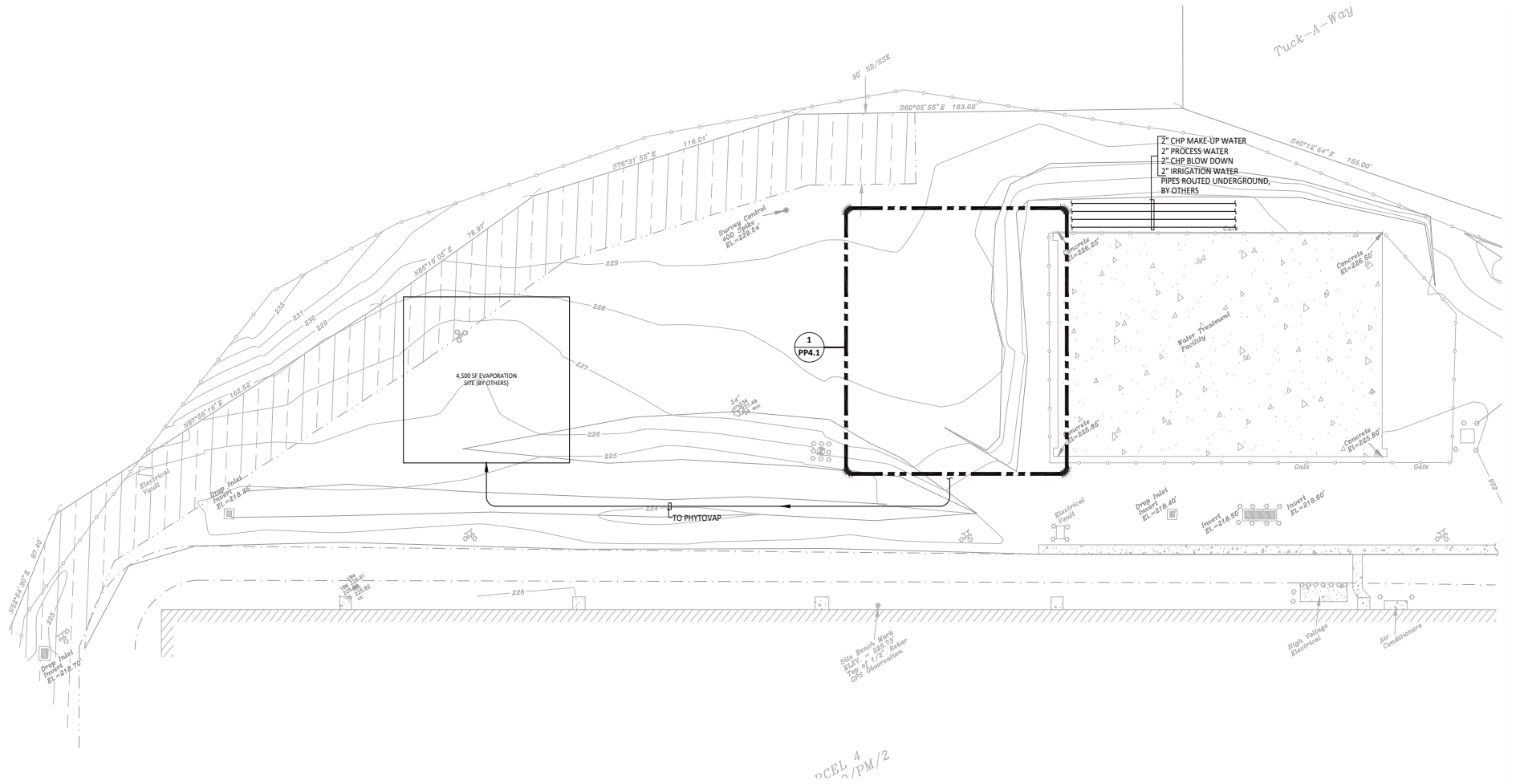
 Project Site

Source: Colebriet Engineering 2024



Figure 4
Comprehensive Site Plan
 Vertis Process Water Treatment Plant IS/MND

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Source: Colebriet Engineering 2024



Figure 5
 Site Plan Illustrating Evaporation Site and Equipment Pad

Vertis Process Water Treatment Plant IS/MND

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B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Mandatory Findings of Significance |

C. DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (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 (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) 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.

Doreen Liberto, AICP, MDR
Community Development Director

Date

D. EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analyses Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

1. AESTHETICS

Except as provided in Public Resources Code Section 21099 (Modernization of Transportation Analysis for Transit-Oriented Infill Projects), would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a-b. A scenic vista is typically considered a location from which the public can experience unique and exemplary high-quality views of an area. According to the Caltrans Scenic Highway System Map, the project site is not located in the immediate vicinity of any designated or eligible scenic highways. The nearest eligible scenic highways are State Route 198 and State Route 25, which are approximately 10 miles and 25 miles east, respectively, from the project site (Caltrans 2018).

The proposed project involves expanding existing water processing facilities through the construction of a new water treatment plant designed to collect and treat irrigation drain water from cannabis cultivation operations. The water process treatment plant site would consist of a 4,500 square foot evaporation site and a 4,000 square foot equipment pad located at the far northwestern corner of the project parcel. Construction of the water process treatment plant would not be of a height that surpasses the existing facility. Further, the proposed project use is consistent with surrounding land uses. Therefore, the proposed project would not have an adverse effect on a scenic vista, nor would the project damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway.

- c. The proposed project is located in an urbanized area of the City of King, with a general plan land use designation of Light Industrial (LI) and zoning of Light Manufacturing (M-1) per the specific plan. The proposed project is consistent with existing regulations for the M-1 zoning, characterized by manufacturing and processing facilities.

Existing use on the project site includes a 400,320 square foot industrial warehouse building, as well as a small water treatment facility located northeast of the full facility. Land uses adjacent to the project site include the Mesa Del Rey Airport to the northeast; electric power station and transfer station operated by Calpine is located to the west; a bus depot and administrative office for Monterey-Salinas Transit (MST) District to the south/southwest; and a greenhouse facility to the south/southeast. Although development of the proposed project would change the existing visual character of the site, it would not conflict with applicable City zoning. Further, the specific plan includes design standards aligned with general plan policies to ensure new development maintains the area's visual character and quality (King City 2007, page 32). Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality.

- d. Development of the proposed project with a water process treatment facility would introduce new sources of nighttime lighting at the project site, including outdoor property lighting (Cole Breit Engineering 2025, page E2.2). These new light sources could result in adverse effects to adjacent land uses due to light trespass and glare. However, the project site is located at the bottom of a sloped area, making it primarily visible from the road above. This topography reduces the potential for light and glare impacts to extend beyond the immediate vicinity of the project site. The specific plan and City of King Municipal Code Chapter 17.03 regulate outdoor lighting facilities for new development. The proposed project would be subject to conformance with these provisions. Therefore, light and glare impacts associated with the proposed project would be less than significant.

2. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects and in assessing impacts on agriculture and farmland, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant 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 Resources Board. Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
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 nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a-e. According to the California Department of Conservation Important Farmland Finder, the project site is designated “Urban and Built-Up Land” and is not under a Williamson Act contract. The project site has a general plan land use designation of Light Industrial (LI) and is zoned Light Manufacturing (M-1), neither of which permit agricultural uses or forestland or timberland uses. Manufacturing, packing and processing is permitted in the M-1 zoning district (City of King Code of Ordinances Chapter 17.30). There are currently

no agricultural uses or forest resources on or adjacent to the project site. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Nor would it conflict with existing zoning for agricultural use or Williamson Act Contract, or cause rezoning of forest land or timberland, or result in the loss or conversion of forest land to non-forest use.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in other emissions, such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

The City of King City is within the North Central Coast Air Basin (air basin), which is under the jurisdiction of the Monterey Bay Air Resources District (air district). This section is based primarily on the air district’s *CEQA Air Quality Guidelines* (2008) (CEQA guidelines), the *2012 – 2015 Air Quality Management Plan* (2017) (“air quality management plan”), and the results of emissions modeling using the California Emission Estimation Model (CalEEMod) version 2022.1, included as [Appendix B](#).

- a. The air district has the primary responsibility for assuring that federal and state ambient air quality standards are attained and maintained in the air basin. An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a non-attainment area. The main purpose of an air quality plan is to bring the area into compliance with the requirements of federal and state ambient air quality standards. CEQA requires the analysis of proposed projects to ensure future development is consistent with applicable air quality plans.

The 2017 air quality management plan was designed to bring the air district into attainment for ozone emissions. As of 2020, the air district is no longer in non-attainment for this pollutant. Consequently, the air district is no longer required to prepare an air quality management plan specifically for this purpose. The air district is currently working to address this change in future updates to its CEQA guidelines. However, the updated guidance will not be available during the time of this assessment. Therefore, the project's consistency with the 2017 plan is evaluated based on the methodology previously recommended by the air district as described below.

Projects directly linked to population growth produce emissions associated with that growth, such as those from motor vehicles and residential heating and cooling. These population-related emissions have been accounted for in the air quality management plan. Population-related projects that align with the forecasted emissions values are regarded as consistent with the air quality management plan. The air district uses consistency with the air quality management plan to determine a project's cumulative impact on regional air quality under CEQA. The air district has established a consistency determination procedure tied to population growth – a project that does not result in an increase in population beyond that projected by the Association of Monterey Bay Area Governments is considered not to conflict with the air quality management plan. The proposed project is not population generating, and therefore would not conflict with or obstruct the implementation of the air quality management plan.

- b. The six most common and widespread air pollutants of concern, or “criteria pollutants,” are ground-level ozone, nitrogen dioxide, particulate matter, carbon monoxide, sulfur dioxide, and lead. In addition, reactive organic gases (ROG) also referred to as volatile organic gases (VOC) are a key contributor to the criteria air pollutants because they react with other substances to form ground-level ozone. Health effects of from prolonged exposures to criteria air pollutants include asthma, bronchitis, chest pain, coughing, and heart diseases.

The air district is responsible for monitoring air quality in the air basin, which is designated under state criteria as a nonattainment area for ozone and suspended particulate matter (PM₁₀). Under federal criteria, the air basin is at attainment (8-hour standard) for ozone and particulates. The air district has developed criteria pollutant emissions thresholds which are used to determine whether or not a proposed project would violate an air quality standard or contribute to an existing violation during operations and/or construction.

State standards are promulgated by the California Air Resources Board as mandated by the California Clean Air Act. The air district has developed criteria pollutant emissions thresholds, which are used to determine whether a proposed project would violate an air quality standard or contribute to an existing violation during operations and/or construction. Based on the air district's CEQA guidelines, a project would have a significant air quality impact if it would:

- Emit 137 pounds per day or more of an ozone precursor air pollutant (volatile organic compounds or nitrogen oxides);
- Directly emit 550 pounds per day or more of carbon monoxide;
- Generate traffic that significantly affects levels of service (results in a significant localized source of emission of carbon monoxide);
- Emit 82 pounds per day or more of suspended particulate matter onsite, which is equivalent to general construction activity over an area of at least 8.1 acres per day, or grading/excavation over an area of at least 2.2 acres per day; or

- Emit 82 pounds per day or more of suspended particulate matter from vehicle travel on unpaved roads.

Construction Emissions

Construction activities are temporary sources of potential air quality impacts that, depending on the size and type of the project, commonly occur in limited time periods. Construction emissions have the potential to impact local air quality and/or pose localized health risks. Localized health risks are discussed under item “c” of this section. Construction emissions include equipment exhaust and fugitive dust emissions generated during grading, and ozone precursor emissions generated during the application of architectural coatings and paving material.

Construction projects using typical construction equipment such as dump trucks, scrapers, bulldozers, compactors and front-end loaders that temporarily emit ozone precursors, including VOC or NO_x, are accommodated in the emission inventories of State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone standards.

Air district CEQA guidelines Table 5-2, Construction Activity with Potentially Significant Impacts, identifies the level of construction activity that could result in significant temporary fugitive dust impacts if not mitigated. Construction activities with grading and excavation that disturb more than 2.2 acres per day and construction activities with minimal earthmoving that disturb more than 8.1 acres per day are assumed to generate more than 82 pounds of particulate matter per day, which would exceed the threshold of significance.

Site preparation activities for the project will occur on approximately 8,500 square feet, or 0.2 acres, of the project site. To the extent that grading and excavation activities are required, they would occur over a smaller area than identified in the threshold of significance. Therefore, the proposed project would not result in significant impacts to air quality during construction, and the project’s contribution to regional air quality impacts from construction would be less than significant.

Operational Emissions

Modeling was conducted to quantify criteria air emissions that would be generated during project operations. The modeling results are used to assess the significance of criteria air emissions based on thresholds of significance contained in the air district’s CEQA guidelines. An “unmitigated” model run was conducted to yield estimates of emissions values in the absence of mitigation measures that otherwise might be required. The model accounts for uniformly applied existing regulatory measures that reduce emissions. The CalEEMod results are included in [Appendix B](#). Model inputs include the type and size of proposed uses by applying CalEEMod default land uses as shown in [Table 1, Project Characteristics](#).

Table 1 Project Characteristics

Proposed Land Use	CalEEMod Land Use Subtype ¹	Size Metric
AquaReclaim Treatment System	General Light Industrial	8,500 square feet

SOURCE: CalEEMod version 2022.1, ColeBreit Engineering 2025

NOTES:

1. CalEEMod default land use subtype. Descriptions of the model default land use categories and subtypes are found in the User's Guide for CalEEMod Version 2022.1 available online at: <https://caleemod.com/user-guide>.
2. 8,500 square foot general light industrial land use accounts for 4,500 square foot evaporation site and a 4,000 square foot treatment equipment site.

Unless otherwise noted, other data inputs to CalEEMod are based on the following primary assumptions:

- Construction start date will be April 2025;
- Operational year is 2026;
- No demolition of existing structures is required; and
- No additional employees will be required to operate the project.

The proposed project will generate criteria air emissions primarily from its operational energy demand. No new notable mobile source emissions would occur given that the project would be operated by existing employees. Nor would other forms of building energy be required (e.g., natural gas). Therefore, criteria emissions are mainly generated from the electricity demand to operate the treatment facility. The California Emissions Estimator Model (CalEEMod) was used to quantify operational criteria air pollutant emissions. A comparison of the model results to the air district thresholds of significance is shown in [Table 2, Unmitigated Operational Criteria Air Pollutant Emissions](#). Detailed emissions modeling results are presented in [Appendix B](#).

Table 2 Unmitigated Operational Criteria Air Pollutant Emissions

Emissions	Volatile Organic Compounds (VOC) ^{1,2,3}	Nitrogen Oxides (NO _x) ^{1,2,3}	Suspended Particulate Matter (PM ₁₀) ^{1,2,3}	Carbon Monoxide (CO) ^{1,2,4}
Air District Thresholds	137	137	82	550
Project	0.26	0.10	0.01	0.08
Exceeds Thresholds?	No	No	No	No

SOURCE: EMC Planning Group 2024, CalEEMod Version 2022.1, Monterey Bay Air Resources District 2008

NOTES:

1. Results may vary due to rounding.
2. Expressed in pounds per day.
3. Maximum daily summer values used for reporting VOC, NO_x and PM₁₀ emissions.
4. Maximum daily winter values used for reporting CO emissions.

The model results indicate that the project emissions would not exceed the thresholds of significance. Therefore, the project contribution to regional criteria pollutant concentrations would be less than significant.

- c. There are no sensitive receptors within 1,000 feet of the project site. The nearest sensitive receptors are residences located approximately 2,500 feet to the west. This distance exceeds the 500-foot screening threshold distance recommended by the California Air Resources Board within which a health risk assessment evaluating the potential health risks to sensitive receptors from diesel exhaust emissions from construction equipment and heavy-duty trucks during project construction or operation, is recommended. The absence of nearby sensitive receptors would indicate that prolonged exposure to construction TAC emissions generated by the project would not occur. As noted above, the project would not generate air emissions during operations. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations.
- d. The most common sources of odors identified in complaints received by local air districts are sewage treatment plants, landfills, recycling facilities, waste transfer stations, petroleum refineries, biomass operations, autobody shops, coating operations, fiberglass manufacturing, foundries, rendering plants, and livestock operations. The AquaReclaim system is designed to remove chloride, calcium, sulfate, nitrate, and phosphate from agricultural drainage so that the treated water can be reused in the irrigation process (Tail Water Systems 2024). While the proposed project is a water treatment facility, the treated effluent consists of irrigation drain water from cannabis cultivation operations and does not contain organic waste that generates odors typically associated with sewage treatment facilities. Additionally, the project is located in an industrial area that is over half a mile from densely populated areas that may be affected by any level of odor generated by the treatment process. Consequently, the proposed project would not produce significant objectionable odors that would adversely affect a substantial number of people and no impact would occur.

4. BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	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, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

Prior to preparation of this analysis, EMC Planning Group biologist Rose Ashbach, M.S., reviewed site plans, aerial photographs, natural resource database accounts, the *King City Zoning Code Amendments Initial Study/Mitigated Negative Declaration* (City of King 2016) for the existing development of the parcel, and other relevant scientific literature.

The proposed project comprises 1.3 acres on the northwest corner of the subject property (APN 026-521-010), located at 100 Don Bates Way. The 19.73 subject parcel is currently developed

with cannabis cultivation facilities. The proposed project would develop the northwest corner of the site with a water recycling facility that would remove excess levels of contaminants (sulfate, calcium, magnesium, and chloride) from the effluent for onsite water recycling and reuse. The location of the project would be north and west of the existing industrial growing development at the site. The proposed project is bounded to the north and west by Airport Road and the King City Airport, and to the south by existing industrial development. Topography of the parcel is sloping south with an elevation of approximately 340 feet on the south side of the parcel and 370 feet on the north portion at the fence line. The parcel is fenced to the north and steeply slopes up to meet Airport Road. The development area is disturbed, and includes ruderal vegetation. The undeveloped portion of the parcel appears to have been used as construction staging and as vehicle access. There is one large eucalyptus tree in the center of the parcel.

- a. **Special-Status Species.** A search of the California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* (CNDDDB) was conducted for the project parcel and the surrounding eight U.S. Geological Survey (USGS) quadrangles in order to generate a list of potentially occurring special-status species for the project vicinity. Records of occurrences for special-status plants were reviewed for those quadrangles in the California Native Plant Society *Inventory of Rare and Endangered Plants of California* (CNPS 2024). A U.S. Fish and Wildlife Service (USFWS) *Endangered Species Program* threatened and endangered species list was also generated for the project site, and the USFWS *Critical Habitat for Threatened & Endangered Species* online mapper was reviewed (USFWS 2024a & USFWS 2024c). Special-status species in this report are those listed as Endangered, Threatened, or Rare or as candidates for listing by the USFWS and/or CDFW; as Species of Special Concern or Fully Protected species by the CDFW; or as Rare Plant Rank 1B or 2B species by the CNPS. [Appendix C, Special-Status Species with Potential to Occur in the Project Vicinity](#), presents tables with special-status species search results, which lists the special-status species documented within the project vicinity, their listing status, suitable habitat description, and their potential to occur on the project site. [Figure 6, Special-Status Species in the Project Vicinity](#), presents a map of the CNDDDB results.

Existing disturbance throughout the site, coupled with a small impact area make the presence of special-status plant or wildlife species unlikely. However, protected nesting birds have the potential to utilize trees and ruderal vegetation at the site and are addressed below.

Nesting Birds. Protected nesting bird species have the potential to nest on open ground, in any type of vegetation, including trees, or in onsite buildings during the nesting bird season (January 15 through September 15). The project site and surrounding properties contain trees, shrubs, and building crevices that may be suitable for nesting. Construction activities can impact nesting birds protected under the federal Migratory Bird Treaty Act and California Fish and Game Code, should nesting birds be present during construction. If protected bird species are nesting adjacent to the project site during the bird nesting

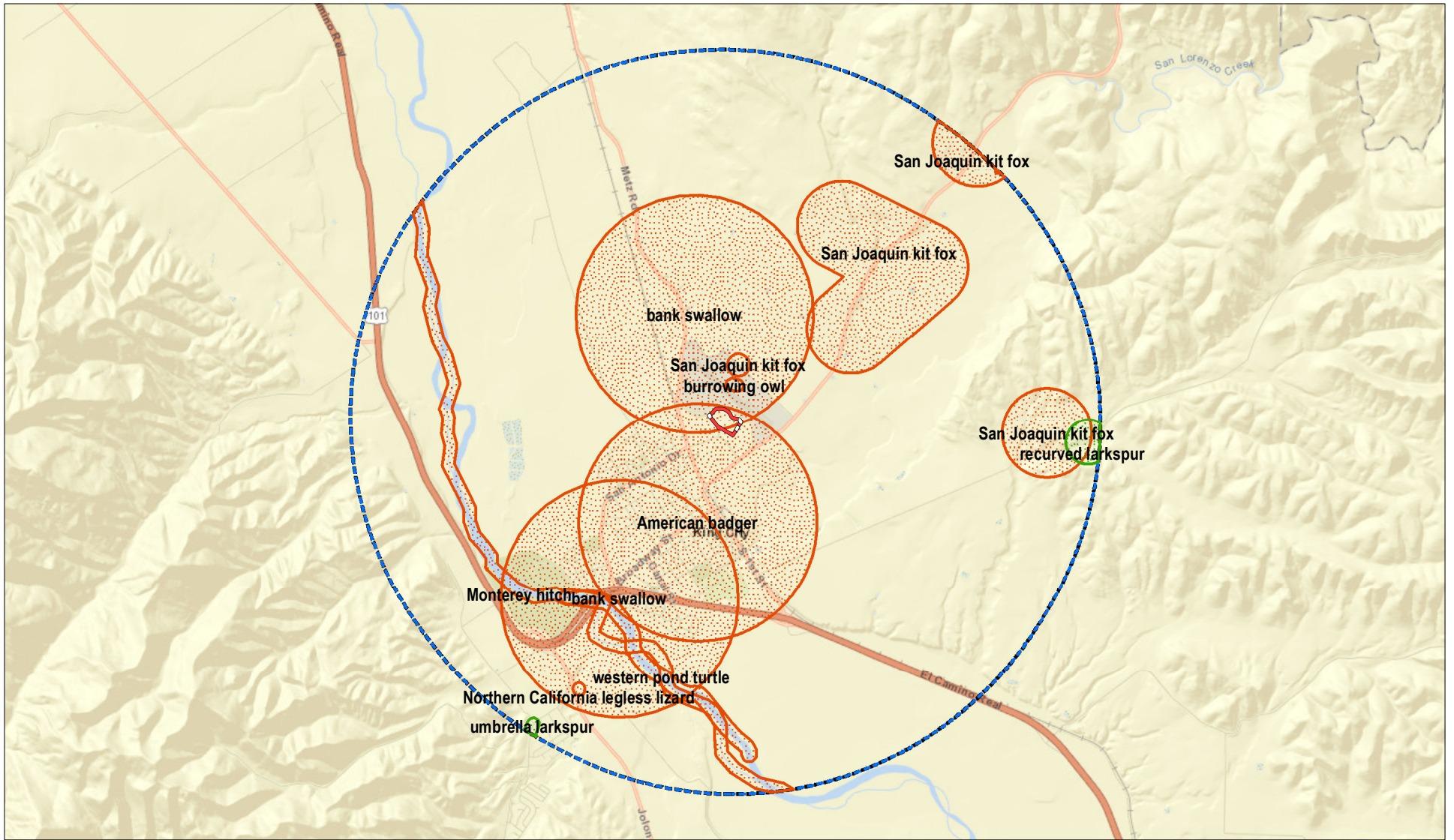
season, then noise-generating construction activities could result in the loss of fertile eggs, nestlings, or otherwise lead to the abandonment of nests. Implementation of Mitigation Measure BIO-1 would reduce potential impacts to nesting birds to less than significant.

Mitigation Measure

BIO-1 To avoid impacts to nesting birds during the nesting season (January 15 through September 15), all construction activities should be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction or project-related work is scheduled during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct nesting bird surveys.

- a. Two surveys for active bird nests will occur within 14 days prior to start of ground disturbance, with the final survey conducted within 48 hours prior to ground disturbance. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. If no nesting birds are found, a letter report confirming absence will be prepared and submitted to the King City Community Development Department and no further mitigation is required.
- b. If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize “normal” bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Once the absence of nesting birds has been confirmed, a letter report will be prepared and submitted to the King City Community Development Department.

- b. **Riparian Habitat or Sensitive Natural Communities.** There are no riparian habitats or sensitive natural communities within the project site. Therefore, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.



Source: ESRI 2024, CNDDDB 2024







-  Project Parcel
-  3-Mile Buffer
-  Special-Status Plants
-  Special-Status Wildlife



Figure 6
Special-Status Species in the Project Vicinity

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- c. **Waters of the United States.** A review of the *National Wetlands Inventory* online database was conducted to identify potential jurisdictional aquatic features on or adjacent to the project site (USFWS 2024b). The results showed no wetland features within or adjacent to the project site. Therefore, the project would not have a substantial adverse effect on state or federally protected wetlands.
- d. **Wildlife Movement.** Wildlife movement corridors provide connectivity between habitat areas, enhancing processes like nutrient flow, gene flow, seasonal migration, pollination, and predator-prey relationships. Increasing connectivity is a critical strategy for addressing habitat loss and fragmentation, a top threat to biodiversity.

The parcel is located within the outer limits of an essential habitat connectivity area as mapped by the *California Essential Habitat Connectivity Project* (CDFW 2024d). Movement of medium to large mammals between the project site and regional open space lands is likely highly restricted due to the lack of natural habitat linkages and the presence of existing barriers (e.g., roads, developed areas, fences) around the parcel. Dispersal to and from the project site by small mammals, amphibians, and reptiles is unlikely due to these existing barriers. Therefore, the project site does not act as a major wildlife corridor, movement pathway, or linkage between larger habitat areas for terrestrial wildlife. It is for this reason that the proposed project would have a less-than-significant impact on wildlife movement.

- e. **Local Biological Resource Policies/Ordinances** The project is located within the limits of King City. The *King City General Plan* Conservation and Open Space (OS) element contains goals and policies associated with protecting environmentally sensitive lands and riparian areas. None of the policies are applicable to the proposed project: The *King City Municipal Code* contains ordinances related to tree removal. The proposed project will not remove any trees and therefore, the ordinance does not apply to the project. The proposed project does not conflict with any local policies or ordinances and no additional mitigation is required.
- f. **Conservation Plans.** There are no critical habitat boundaries, habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans applicable to the proposed project site (CDFW 2024b).

5. CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a <i>historical resource</i> pursuant to section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of a <i>unique archaeological resource</i> pursuant to section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Historical Resources.** According to the County of Monterey Parcel Report Web App, there are no known historical resources located within the project site. Additionally, the Monterey County Register of Historic Resources (June 2020) does not identify any historical resources located on or adjacent to the project site. Therefore, the proposed project would have no impact on a historical resource.
- b. **Unique Archaeological Resources.** The County of Monterey's Archaeological Sensitivity Map (updated July 11, 2023) designates the project site as an area of low archaeological sensitivity, with no known cultural resources present. However, the 2007 *Initial Study/Mitigated Negative Declaration for the East Ranch Business Park Specific Plan* (specific plan IS/MND) notes that the Northwest Information Center at Sonoma State University identified a deeply buried habitation site (2.46 meters or 8 feet below ground) within the specific plan area. The exact location of the habitation site is not identified (specific plan IS/MND, page 66).

Project grading and trenching activities are noted by the applicant to be minimal in nature primarily consisting of minimal leveling of the project site to place the concrete equipment pad and ensure proper drainage. Additionally, some connect buried piping to the existing wastewater treatment facility on-site to the immediate east of the proposed water treatment process equipment pad. Even though no cultural resources are known to exist on the project site or parcel, given the project's proximity to other known cultural resource sites in the specific plan area (which is approximately 107 acres in size), there is always the potential for accidental discovery of unknown buried cultural resources during grading, trenching or other construction activities. Damage to significant cultural resources would be considered a significant adverse environmental impact.

The City currently has standard conditions of approval associated with cultural resources, included as [Appendix D](#). These standard conditions of approval identify pre-construction requirements, discovery of cultural resource requirements, and tribal monitoring requirements. The City's standard conditions of approval associated with cultural resources are adequate to address the potential for inadvertent discovery of unique archaeological resources. Compliance with the City's standard conditions of approval would ensure no adverse impacts result from construction of the proposed project.

- c. **Disturbance of Human Remains.** The City's standard conditions of approval also address protocol in the event human remains are identified pursuant to CEQA Guidelines section 15064.5(e)(1)(A)(B) for all projects, including those where cultural resources may or may not be present based on substantial evidence. Compliance with the City's standard conditions of approval associated with the inadvertent discovery or disturbance of human remains would ensure no adverse impacts result from construction of the proposed project.

6. ENERGY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. The analysis of energy impacts is qualitative because no quantified threshold of energy demand exists at which energy demand could be considered wasteful, inefficient or unnecessary, either during construction or project operations. Rather, energy effects are examined in light of the project type and regulations promulgated by the state that directly and indirectly result in reduced energy consumption. For informational purposes, estimates of energy demand from the most common forms of energy are discussed below.

The project involves the expansion of the existing onsite water processing facility, the operations of which will be managed by existing employees. Consequently, the project would not generate new vehicle miles traveled or transportation fuel demand. While some additional vehicle travel may be necessary for periodic maintenance, the resulting fuel demand would be minimal.

The treatment process equipment is not natural gas-powered, nor is natural gas required for other facility operations. As a result, electricity will serve as the primary energy source for operations. As shown Table 5.11.1, Unmitigated Operational Energy Consumption, in the CalEEMod results, [Appendix B](#), electricity demand would be approximately 85,732 kilowatt-hours per year. For context, according to the California Energy Commission Energy Consumption Data Management System, in 2022, total electricity consumption in Monterey County was 2,490,468,746 kilowatt-hours per year. Estimated project electricity demand would represent 0.003 percent of that demand (California Energy Commission 2022).

A project could be considered to result in significant wasteful, inefficient, or unnecessary energy consumption if its energy demand is extraordinary relative to common land use types or projects. A water treatment facility is a common use type and is not considered to be extraordinarily energy consumptive. The project energy demand is not wasteful or unnecessary, as it is being proposed to support water conservation and water quality.

A multitude of state regulations and legislative acts are aimed at reducing electricity demand, improving energy efficiency in new construction, promoting alternative energy production and use efficiency. Required compliance with many of the regulations is not within the direct control of local agencies or individual project developers, but their implementation can reduce energy demand from land use projects both directly and indirectly. A representative example that is relevant to the proposed project would be the California Renewables Portfolio Standard. This standard aims to increase the percentage of electricity derived from renewable sources by requiring utility providers to supply 60 percent of electricity from renewable sources by 2030 and 100 percent by 2045 (California Energy Commission 2017).

Given the considerations summarized above, the proposed project would have a less-than-significant energy impact.

- b. At this time, there are no regulations at the state or local level that would mandate that the proposed project include on-site renewable energy sources. The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

7. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(1) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a. Potential impacts from exposure to geologic risks are as follows:

(1) Surface Fault Ruptures. The project is not located in an Alquist-Priolo Fault Zone. There are no known faults that traverse the project site.

(2) Ground Shaking. According to the specific plan (2007, page 16), the City of King has historically been subject to significant ground shaking due to active fault systems in the King City area, including the King City-Reliz-Riconad, Los Lobos, San Andreas, Sur Nacimiento, and San Gregorio-Palo Colorado-Hosgri faults. Minor faults are also present in surrounding areas such as the Salinas River, Hunter Liggett, and Peach Tree Valley regions. None of these faults traverse the specific plan area or the proposed project site.

While the potential for intense seismic activity cannot be eliminated, the proposed project is not population generating, and does not involve new road construction or extension of existing roads. Therefore, it would not directly or indirectly result in substantial adverse effects, including risk of loss, injury, or death involving ground shaking.

(3) Liquefaction. Soil liquefaction is a state of soil particles suspension caused by a complete loss of strength when the effective stress drops to zero. Liquefaction usually occurs under vibratory conditions such as those induced by seismic event. As indicated in checklist item “a(2),” the proposed project is not population generating, and does not include the construction of residences, new roads or extension of existing roads. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving liquefaction.

(4) Landslides. According to the California Department of Conservation Reported California Landslides Map, no landslides have been reported in the City of King. The nearest reported landslide was approximately 15 miles northwest of the project site. The project site and surrounding vicinity is relatively flat, with a slope of less than 25 percent (Monterey County Parcel Report Web App, 2024). Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslide.

- b. Construction activities involving grading expose soils to wind, water, and other eroding elements. The proposed project includes minimal grading, if any, at the project site to level the ground and ensure proper drainage, which could result in soil erosion. Given the minimal anticipated grading at the project site, the impact on soil erosion would be less than significant
- c-d. Expansive soils are a potential geologic hazard as structures located on them may be damaged should the soil suddenly shrink or swell. According to the specific plan, the most common soil types found within the specific plan area, including the project site, are alluvium or sand and gravel sediments. These soil types are expansive soils, subject to potential shrink or swell with changes in moisture content.

The project site is relatively flat with a slope of less than 25 percent. Therefore, it is unlikely that development of the project will result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Project impacts associated with expansive soils are less than significant.

- e. The project does not propose the use of septic tanks or other alternative wastewater disposal systems.

- f. According to the specific plan IS/MND (2007, page 66), there are no known unique geologic features within the specific plan area, including the project site. However, according to the *2007 Monterey County General Plan EIR*, paleontological resources, including a range of plant and animal fossil remains, have been encountered at many locations within the county (general plan EIR, page 4.10-7). However, the proposed project's anticipated land disturbance includes minimal grading, if any, and is limited to leveling the surface for proper drainage. The proposed project would not require grading to any depth that could directly or indirectly destroy a unique paleontological site.

8. GREENHOUSE GAS EMISSIONS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. The City of King City has not adopted a plan for reducing greenhouse gas emissions (GHG) or a threshold of significance for GHG emissions, nor has the air district developed or adopted a threshold of significance for GHGs from land use development projects, such as the proposed project. In the absence of a local qualified plan, lead agencies may defer to thresholds of significance of other agencies that are supported by substantial evidence. In lieu of an available qualified plan, guidance from the San Luis Obispo County Air Pollution Control District (SLOAPCD) was utilized for evaluating project impacts.

The SLOAPCD released its *CEQA Greenhouse Gas Thresholds & Guidance for the San Luis Obispo County Air Pollution Control District's 2012 CEQA Air Quality Handbook and Related Guidance on Use of Screening Tool, CalEEMod, and Local Reductions/Sequestration Projects & Offset Mix Calculator* in 2023 to assist lead agencies in assessing the potential air quality impacts from new residential, commercial, and industrial development. That guidance includes substantial evidence for establishing a brightline threshold of significance for the year 2026, the projected operational date for the proposed project, and for subsequent individual years to the year 2045. The threshold year of 2045 correlates to the most recently adopted statewide GHG emissions reduction target identified in Assembly Bill 1279. That bill sets a net zero GHG emissions reduction target for 2045. Table 2 in the SLOAPCD guidance identifies a bright line threshold of significance of 880 metric tons of carbon dioxide equivalent (MT CO₂e) per year for the year of 2026 (San Luis Obispo County Air Pollution Control District 2023, Page 5). Projects anticipated to be operational in the year 2026 with annual GHG emissions forecast to be below the brightline threshold, are assumed to have a less-than-significant GHG impact.

GHG emissions from construction and operation of the proposed project were estimated using CalEEMod version 2022.1. Projected emissions are summarized in [Table 3, Projected Annual GHG Emissions](#). The detailed CalEEMod modeling results are included as [Appendix B](#).

Table 3 Projected Annual GHG Emissions

Emissions Sources	GHG Emissions (MT CO ₂ e)
Mobile	0.00
Area	0.17
Energy	8.01
Water	3.67
Waste	3.29
Refrigerants	0.37
Amortized Construction	2.21
Total	17.72

SOURCE: EMC Planning Group 2024, CalEEMod Version 2022.1

Construction activity, including operation of off-road construction equipment, would generate approximately 66.29 MT CO₂e per year. To account for the contribution of construction emissions to the project’s annual emissions profile, construction emissions are amortized over an assumed 30-year operational timeframe; amortized annual emissions equal 2.21 MT CO₂e per year. The total annual operational GHG emissions are forecast at 15.51 MT CO₂e, with energy being the dominant source at 8.01 MT CO₂e per year. The combined amortized construction and operational emissions account for a total of 17.72 MT CO₂e per year.

The annual project GHG emissions volume for the proposed project is well below the SLOAPCD 2026 brightline threshold of 880 MT CO₂e per year. Therefore, the project would have a less-than-significant GHG emissions impact.

- b. As described in checklist item “a” above, neither the City nor the air district has adopted a plan for reducing GHG emissions. Consequently, the significance of GHG impacts were assessed based on brightline thresholds of significance adopted by a neighboring air district as part of their GHG reduction plans. Because the project impact is less than significant, the project would have no impact from conflict with regulations or plans for reducing GHG emissions.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or a public-use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

The project site has a land use designation of Light Industrial (LI) and is zoned Light Manufacturing (M-1), and proposed uses are consistent with surrounding industrial uses.

The proposed project involves expanding existing water processing facilities through the construction of a new water treatment plant designed to collect and treat irrigation drain water from cannabis cultivation operations. The water process treatment plant site would consist of a 4,500 square foot evaporation site and a 4,000 square foot equipment pad located at the far northwestern corner of the project parcel. This involves grading and installation of tanks, ion/manganese filter, nanofiltration, ion exchange, clarifier, and various chemical feeders, waste collection, piping, and pumps.

- a. Long-term operation of the proposed project may include fuels, oils, mechanical fluids, or other chemicals used for irrigation pumping. Transportation, storage, use and disposal of hazardous materials during operation of the proposed project would be required to comply with applicable federal, state, and local statutes and regulations. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.
- b. Based on historical aerial photographs, the project site appears to have been utilized for agricultural uses from as early as 1985 until 1994. Existing uses on the project site include a 400,320 square foot industrial warehouse building that was built in 1997 according to the Monterey County Assessor's Office, as well as a small water treatment facility located northeast of the full facility. The proposed project would not introduce a new use on site, but expand upon existing water process operations. Therefore, development of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- c. No schools are located within one-quarter mile of the project site. Therefore, the proposed project would not emit or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- d. The project site is not located on or adjacent to sites identified on any of the following lists compiled pursuant to Government Code section 65962.5. Therefore, the proposed project would not create a significant hazard to the public or the environment.
 - Hazardous Materials Waste and Substances Sites from the Department of Toxic Substances Control EnviroStor Database (Department of Toxic Substances Control 2024);
 - Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker Database (State Water Resources Board 2024);
 - Solid Waste Disposal Sites Identified by Water Board with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit (California Environmental Protection Agency 2024);
 - "Active" Cease and Desist Order and Cleanup and Abatement Orders from Water Board (California Environmental Protection Agency 2024); and
 - List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the Department of Toxic Substances Control (California Environmental Protection Agency 2024).
- e. The proposed project is located less than a mile south of Airport Road and the Mesa Del Rey Airport, which has an airport master plan dated 1978. The airport master plan, which predates the East Ranch Business Ranch Specific Plan and identifies the project site as being within a designated "Industrial Reserve", provides minimal guidance for new adjacent development (Mesa Del Rey Airport Master Plan 1978, page 8).

The project involves expanding existing water processing facilities, maintaining consistency with current on-site and adjacent land uses. As the project would not introduce a new use, generate population, or significantly increase staffing, impacts associated with its location adjacent to an airport would be considered less than significant.

- f. The city's evacuation routes would be along State Highway 101, which while the small portion of the highway running through King City is east-west in direction, provides regional access to the north and south, and Metz Road, also providing access to the north and south. The proposed project would not impair or obstruct these evacuation routes. Therefore, the proposed project would not impede or conflict with any adopted emergency response or evacuation plans.
- g. According to the California Department of Forestry and Fire Protection's map for Fire Hazard Severity Zones in State Responsibility Areas in Monterey County, the project site is located in a local responsibility area (LRA) and is not located within a "Very High Fire Hazard Severity Zone.". The project site is located in a highly developed industrial/commercial area of King City and lacks vegetation that would be considered highly flammable. The proposed project would be required to comply with the California Fire Code and requires review by the City Fire Department for conformance with all applicable fire safety and building code requirements. Therefore, the proposed project would not expose people or structures to a risk of loss, injury or death involving wildland fires.

10. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(1) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(4) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. **Water Quality Standards or Waste Discharge Requirements Associated with Construction.** In 2024, the project applicant received a Notice of Violation from the City of King for exceeding discharge limits under Industrial Wastewater Discharge Permit No. 2021-001. To address this, the proposed project includes the installation of a closed-loop wastewater system, which is designed to eliminate routine discharges and minimize impacts to water quality. As a contingency for system failure, the project applicant has requested to maintain an open wastewater discharge permit, which would require

submitting a new application for an Industrial Wastewater Discharge Permit. This permit would allow limited wastewater discharge to the city's sewer system, subject to strict permit conditions, including monitoring and reporting requirements. The wastewater discharge permit is not intended for regular operations and would only be used in rare circumstances to ensure uninterrupted facility function.

Additionally, the project would be subject to the Central Coast Regional Water Quality Control Board Cannabis Regulatory Program under the State Water Resources Control Board (Statewide) Cannabis General Order (Order WQ 2019-0001-DWQ). This program mandates comprehensive best management practices, water quality monitoring, and discharge controls to protect surface and groundwater resources.

The following mitigation measure would ensure that the proposed project would remedy the existing wastewater discharge violation while adhering to the City of King's industrial wastewater discharge permit requirements, associated monitoring and reporting program, and the Statewide Cannabis Cultivation General Order (No. WQ 2019-0001-DWQ) regulatory framework.

Mitigation Measure

HYD-1 Prior to issuance of any building permits, the applicant shall:

1. Remedy the existing wastewater discharge violation on record with the City of King Public Works Department to the satisfaction of the City of King Public Works Director.
2. The applicant shall obtain an industrial wastewater discharge permit from the City of King Public Works Department and shall adhere to the City of King's industrial wastewater discharge permit requirements for the duration of the permit approval. The applicant shall submit quarterly wastewater discharge reports to the Public Works Department which shall document compliance with all applicable industrial wastewater discharge permit requirements.

With compliance with the mitigation measure identified above, the proposed project would not violate any waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

- b. **Groundwater Supplies.** The City of King's water supply system is owned and operated by California Water Services (Cal Water). The city's water is derived from six wells that draw from the Salinas Valley Upper Valley Aquifer Groundwater Subbasin. The proposed project does not require water services, and therefore would not result in a decrease in groundwater supplies.

Groundwater Recharge. According to the Groundwater Basin Boundary Assessment Tool by the Department of Water Resources, the project site lies within the Salinas Valley Upper Valley Aquifer Groundwater Subbasin. Development of the proposed project (constructing a 4,500 square foot evaporation site and 4,000 square foot equipment pad)

would minimally increase the amount of impervious surface and therefore, would not substantially interfere with groundwater recharge. This impact would be less than significant.

- c. The project parcel includes an existing 400,320 square foot industrial warehouse building, as well as a small water treatment facility located northeast of the full facility. The proposed project would increase the amount of impervious surface by constructing a 4,500 square foot evaporation site and a 4,000 square foot equipment pad located at the far northwestern corner of the project parcel. This involves grading and installation of tanks, ion/manganese filter, nanofiltration, ion exchange, clarifier, and various chemical feeders, waste collection, piping, and pumps. Due to the small amount of proposed construction on an already heavily paved parcel, the proposed project would minimally alter the existing drainage pattern of the site. There are no streams or rivers in the immediate vicinity of the project site.

Potential impacts from the increase in impervious surfaces are discussed below:

- (1) **Erosion.** Development of the proposed project would not lead to significant siltation and/or erosion on- or off-site due to the minimal amount of proposed grading.
- (2) **Flooding.** According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer Viewer, the project site is located within FEMA Flood Zone X, indicating minimal risk of flooding. The proposed project involves construction of a 4,500 square foot evaporation site and a 4,000 square foot equipment pad located at the far northwestern corner of the project parcel, which would introduce additional impervious surfaces. The site plan (sheet 6 of [Appendix A](#)) indicates that storm water from the proposed project will drain into a trench drain within the equipment pad storm drain piping system located on the project site. Therefore, the trench drain eliminates the potential for flooding on- or off-site, ensuring a less-than-significant impact.
- (3) **Runoff.** Development of the proposed project would create storm water runoff. The site plan (sheet 6 of [Appendix A](#)) indicates that storm water from the proposed project will drain into a trench drain within the equipment pad storm drain piping system located on the project site. To ensure that the proposed project does not provide additional sources of polluted runoff, the following mitigation measure shall be required.

Mitigation Measure

- HYD-2 Prior to issuance of a grading permit, the applicant shall prepare a drainage plan that complies with the Monterey Regional Storm Water Management Best Management Practices and standards established for compliance with non-point discharge emissions for storm water. The drainage plan shall incorporate Low Impact Development Strategies and Best Management Practices to reduce storm water runoff, encourage infiltration, and reduce pollutant transmission. The drainage plan shall be subject to review and approval by the city and be implemented with development of the project.

(4) Flood Flows. As discussed under checklist item “d” below, the project site is located within an area of minimal flood hazard. Therefore, development of the proposed project would not impede or redirect flood flows.

- d. According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer Viewer, the project site is located within FEMA Flood Zone X, indicating minimal risk of flooding. Additionally, the California Department of Conservation does not identify the project site within a tsunami hazard area, nor a seiche zone. Therefore, development of the proposed project would not risk the release of pollutants due to project inundation.
- e. **Water Quality.** The *Water Quality Control Plan for the Central Coastal Basin* (hereinafter “Basin Plan”) shows how the quality of the surface and ground waters in the Central Coast Region should be managed to provide the highest water quality reasonably possible. The Regional Water Quality Control Board implements the Basin Plan by issuing and enforcing waste discharge requirements to individuals, communities, or businesses whose waste discharges can affect water quality. These requirements can be either State Waste Discharge Requirements for discharges to land, or federally delegated National Pollutant Discharge Elimination System (NPDES) permits for discharges to surface water. As discussed under checklist item “a” above, the project applicant would be subject to the Central Coast Regional Water Quality Control Board Cannabis Regulatory Program under the State Water Resources Control Board Cannabis General Order (Order WQ 2019-0001-DWQ). By complying with the Cannabis General Order, the proposed project would not conflict with the groundwater sustainability plan.

Groundwater Sustainability. The Sustainable Groundwater Management Act is a state law requiring groundwater basins to be sustainable. The act enables eligible local agencies to form groundwater sustainability agencies, develop groundwater sustainability plans for designated basins in their jurisdiction by 2020, and achieve groundwater sustainability within 20 years of plan implementation.

The project site is located within the Salinas Valley Upper Valley Aquifer Groundwater Subbasin, managed by the Salinas Valley Basin Groundwater Sustainability Agency. In January 2022, the agency adopted the Salinas Valley Groundwater Basin Upper Valley Aquifer Subbasin Groundwater Sustainability Plan. The plan details how the Upper Valley Aquifer Subbasin will become sustainable over a 20-year timeframe through a combination of projects and management of groundwater pumping.

To achieve the sustainability goals for the subbasin, and to avoid undesirable results over the remainder of a 50-year planning horizon, multiple projects and management actions have been identified and considered in the plan to ensure subbasin sustainability. The proposed project would not interfere with a water quality control or sustainable groundwater management plan.

11. LAND USE AND PLANNING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause any significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a. The project site is in the northeastern region of King City, within the Light Manufacturing (M-1) zoning district. It is bordered by manufacturing facilities to the west, south, and east, and by Mesa Del Rey Airport to the north/northeast, with no nearby existing or planned residential areas. The proposed project would not introduce a new use on site, but expand upon existing water process operations. Therefore, the project would not physically divide an established community.

b. The project site has a general plan land use designation of Light Industrial (LI) and is zoned Light Manufacturing (M-1). Existing use on the site includes a commercial cannabis facility and a small water treatment facility located northeast of the full facility.

A conditional use permit is required for the proposed project (expansion of existing water processing facilities). No feature of the proposed project would conflict with the existing industrial land use or zoning designations, nor would it cause an environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

12. MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a-b. The project site and adjacent lands are designated for industrial uses on the general plan land use map. The project site is not zoned for mineral extraction. Therefore, the proposed project would not result in impacts to known mineral resources or result in the loss of availability of a locally important resource recovery site.

13. NOISE

Would the project result in:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Generation of excessive ground-borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a-b. The noise element of the general plan establishes exterior noise compatibility criteria for land use planning (King City Noise Element, Table 2, page 10). According to the noise element, commercial and industrial land uses with an exterior L_{dn} of less than 75 dBA are considered compatible and do not require special noise attenuation measures. However, for uses with an exterior L_{dn} exceeding 75 dBA, a noise analysis is required to identify necessary noise reduction measures, which must be incorporated into project design.

The City of King Code of Ordinances outlines additional noise standards applicable to the project. Per Section 7.25.050 (Exterior Noise Standards):

- Between 9:00 a.m. and 10:00 p.m., exterior noise levels must not exceed 80 dB when measured from the public right-of-way adjacent to the noise source; and
- Between 10:00 p.m. and 9:00 a.m., the operation of sound-amplifying equipment is prohibited if it projects noise outdoors.

Per Section 17.56.030 (Noise – Sound Pressure Level):

- Industrial land uses may not exceed 68 dBA sound pressure levels at the lot line; and
- No vibrations shall be permitted to cause a noticeable tremor, measurable without instruments at the lot line.

Construction Noise

Section 7.25.070 (Exemptions) of the City of King Code of Ordinances exempts construction-related noise from the sound level provisions outlined in Chapter 7.25 (Noise Control Standards), provided that construction activities are conducted between the hours of 7:00 a.m. and 7:00 p.m. Exceptions to these permitted hours may be authorized at the discretion of the building inspector. Adherence to these provisions would ensure that temporary noise-related impacts from construction activities remain compliant with the standards established in Section 7.25.050 of the City of King Code of Ordinances.

Operational Noise

The proposed project involves expanding existing water processing facilities through the construction of a new water treatment plant designed to collect and treat irrigation drain water from cannabis cultivation operations. The project site is designated for Light Industrial (LI) use and zoned for Light Manufacturing (M-1) within the specific plan area, aligning with the uses of adjacent properties.

The project site is located more than one-half mile from the nearest sensitive receptors, such as residential areas. The project would be required to adhere to the noise standards outlined in Section 17.56.030 (Noise – Sound Pressure Level) of the City of King Code of Ordinances, which limits noise levels to a maximum of 65 dBA at the property line and prohibits vibrations that cause noticeable tremors at the lot line measurable without instrumentation. Compliance with these standards ensures the project would not generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or applicable noise ordinances. Additionally, adherence to these provisions ensures the project would not generate excessive ground-borne vibration or ground borne noise level.

- c. The proposed project is less than a mile south of Airport Road and Mesa Del Rey Airport, which operates under a 1978 master plan. This plan, predating the East Ranch Business Park Specific Plan, designates the site as an "Industrial Reserve" but provides minimal guidance for adjacent development (Mesa Del Rey Airport Master Plan 1978, page 8). The project site has a General Plan (1998) land use designation of Light Industrial (LI) and M-1 (Light Manufacturing) zoning under the East Ranch Business Park Specific Plan (2007), which allows for manufacturing, packing, and processing uses. The proposed project is consistent with adjacent land uses and is not population generating. As a result, the project would not expose residents or workers to excessive noise levels.

14. POPULATION AND HOUSING

Would the project:

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

Comments:

- a. The proposed project involves expanding existing water processing facilities through the construction of a new water treatment plant designed to collect and treat irrigation drain water from cannabis cultivation operations.

The project site is located in a region primarily developed with manufacturing and industrial uses, including electric power and transfer stations, Monterey-Salinas Transit District bus depot, and agricultural packing and distribution facilities. The proposed project would not result in a new or different type of use for the area, nor would the project create or improve any infrastructure serving the region. The proposed project would not require new employees. Implementation of the project would not result in the exceedance of population projections or result in significant growth inducing effects.

- b. The project site does not contain any residences and, as a result, would not displace existing people. Therefore, implementation of the project would not displace substantial numbers of people or existing housing units.

15. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

The King City Volunteer Fire Department, located at 422 Bassett Street, serves the project site and is approximately 1.36 miles away. The King City Police Department, at 415 Bassett Street, also serves the site and is the same distance away. Public schools in King City are served by the King City Union School District, and Monterey County library services are available in the city. The nearest parks, King Street Pocket Park and Creek Bridge Soccer Park, are approximately one mile southwest of the project site. Park services are further detailed in Section 16, Recreation.

a-e. The proposed project involves expanding existing water processing facilities through the construction of a new water treatment plant designed to collect and treat irrigation drain water from cannabis cultivation operations. As discussed in Section 14, Population and Housing, the proposed project would not require new employees. Since the project does not include construction of residences and no new employees are required, no increase in population is expected to result from the proposed project.

The proposed project has the potential to require emergency fire service; however, no physical improvements to public facilities would be required to serve the project. Therefore, there would be no impact associated with the construction of new facilities or physically altered facilities.

16. RECREATION

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

Comments:

- a-b. No existing public recreational facilities are located on the project site or in the vicinity, and implementation of the project would not directly affect the provision or demand for any recreation. There would be no increase in the use of existing neighborhood or regional parks or other recreational facilities that would cause or accelerate the physical deterioration of such facilities. Further, the proposed project does not require the construction or expansion of such facilities. Therefore, no adverse impacts to recreation would occur with implementation of the proposed project.

17. TRANSPORTATION

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. The proposed project includes improvements to and expansion of the project site's existing onsite wastewater treatment facility. Other than short-term construction activity, the proposed project would not add vehicle trips to the City's circulation system. Therefore, the proposed project would not conflict with any program, plan, ordinance, or policy addressing the City's circulation system.
- b. The proposed project involves expanding existing water processing facilities through the construction of a new water treatment plant designed to collect and treat irrigation drain water from cannabis cultivation operations. Development of the project site does not involve the extension of existing or construction of new roadways. Further, the proposed project is consistent with existing adjacent industrial uses, and therefore would not result in a significant impact to existing traffic operations in the area. A vehicle miles traveled assessment was not conducted based on the project type (industrial), which would not increase the population size or vehicle miles traveled in the area. Therefore, there would be no VMT impact.
- c-d. Vehicular access to the project site would be via San Antonio Drive and Don Bates Way. The proposed project involves expanding existing water processing facilities through the construction of a new water treatment plant designed to collect and treat irrigation drain water from cannabis cultivation operations. Physical impacts of the project consist of constructing a 4,500 square foot evaporation site and a 4,000 square foot equipment pad located at the far northwestern corner of the project parcel. These improvements would be confined to the project site and are not anticipated to create or exacerbate hazards related to geometric design or land use incompatibility.

As described under checklist item "a," existing uses on the project site include a 400,320-square foot industrial warehouse and a small water treatment facility located northeast of the primary facility. The proposed project has been designed to comply with applicable standards and would not result in hazards related to design features or inadequate emergency access.

18. TRIBAL CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. The CEQA statute as amended by Assembly Bill 52 (Public Resources Code Sections 21073 and 21074) define “California Native American tribe” and “tribal cultural resources.” A California Native American tribe is defined as a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission. “Public Resources Code Section 21080.3.1 outlines procedures for tribal consultation as part of the environmental review process.

On November 4, 2024, the City sent an offer of consultation letter to the tribal representatives of the Xolon Salinan Tribe and the Salinan Tribe of Monterey & San Luis Obispo Counties.

The Salinan Tribe responded to the consultation offer letter indicating concerns that cultural resources may be impacted by the project (Patti Dunton, Administrator, email dated December 4, 2024). The tribe requested that all ground disturbing activities be monitored by a cultural resource specialist from the tribe.

As noted previously in Section D.5, Cultural Resources, the City currently has standard conditions of approval associated with cultural resources (including tribal cultural resources), included as Appendix D. These standard conditions of approval identify pre-

construction requirements, discovery of cultural resource requirements, and tribal monitoring requirements. The City's standard conditions of approval associated with cultural resources are adequate to address the project's potential to cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074. Compliance with the City's standard conditions of approval would ensure no adverse impacts to tribal cultural resources would result from construction of the proposed project.

The City followed up with the Xolon Salinan Tribe on June 2, 2025 and has not received any further response as of June 5, 2025.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, single-dry and multiple- dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

The proposed project involves expanding existing water processing facilities through the construction of a new water treatment plant designed to collect and treat irrigation drain water from cannabis cultivation operations. Physical impacts of the project consist of constructing a 4,500 square foot evaporation site and a 4,000 square foot equipment pad located at the far northwestern corner of the project parcel. The complete treatment system includes installation of tanks, ion/manganese filter, nanofiltration, ion exchange, clarifier, and various chemical feeders, waste collection, piping, and pumps.

- a. The proposed project will not require the relocation or construction of new or expanded water, storm water drainage, electric power, natural gas, or telecommunications facilities. The proposed project is the expansion of the existing water treatment facilities for which impacts related to the expansion of are addressed throughout this initial study and would be less than significant with implementation of identified mitigation measures and/or the City's standard conditions of approval.

As described in Section 10, Hydrology and Water Quality, under checklist item “a,” the proposed project would be subject to the Central Coast Regional Water Quality Control Board Cannabis Regulatory Program under the State Water Resources Control Board Cannabis General Order (Order WQ 2019-0001-DWQ). By complying with the Cannabis General Order and monitoring and reporting program, the project would not cause significant environmental effects.

- b. The proposed water processing facility will not require additional water service beyond the existing facility’s current usage. The water processing facility is designed to treat agricultural drainage water on-site, recycling it for reuse in irrigation or other agricultural processes. This self-contained system eliminates the need for external water service, as it relies on treating and reusing existing drainage water, thereby reducing dependency on additional water sources. Therefore, the project would have a beneficial impact.
- c. As discussed in Section 10, Hydrology and Water Quality, under checklist item “a,” the project applicant has requested to maintain an open wastewater discharge permit, which would require submitting a new application to the City of King for an Industrial Wastewater Discharge Permit. The wastewater discharge permit is not intended for regular operations and would only be used in rare circumstances to ensure uninterrupted facility function.

This permit would allow limited discharge to the city’s sewer system, subject to strict permit conditions, including monitoring and reporting requirements. Therefore, the proposed project would not result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments.

- d-e. The proposed project will not generate solid waste.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

Comments:

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Viewer, the project site is not located within a designated fire hazard severity zone in a state responsibility area. However, it is situated approximately 0.5 miles southwest of a moderate fire hazard severity zone in a state responsibility area. The proposed project is not population generating.

- a. The City of King does not have an adopted emergency response or emergency evacuation plan. However, the proposed project is not population generating and therefore, would not create a conflict with an emergency response or emergency evacuation plan.
- b. The project site and surrounding vicinity is relatively flat, with a slope of less than 25 percent (Monterey County Parcel Report Web App, 2024). Development of the proposed project would not exacerbate wildfire risks and thereby expose people to pollutant concentrations from a wildfire or the uncontrolled spread of wildfires.
- c. The proposed project will not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

- d. The project site is relatively flat and does not involve slopes greater than 25 percent; the project site is located within a low landslide susceptibility area (Monterey County Parcel Report Web App, 2024). As discussed in Section 10, Hydrology and Water Quality, under checklist item “c(2),” the proposed project involves construction of a 4,500 square foot evaporation site and a 4,000 square foot equipment pad located at the far northwestern corner of the project parcel, which would introduce additional impervious surfaces. The site plan (sheet 6 of [Appendix A](#)) indicates that storm water from the proposed project will drain into a trench drain, eliminating the potential for flooding. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. As discussed in Section 4.0, Biological Resources, the proposed project does not have the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare, or threatened species. Implementation of Mitigation Measure BIO-1 would reduce potential impacts to a less-than-significant level.

As discussed in Section 5.0 Cultural Resources, and Section 18.0, Tribal Cultural Resources, the project site is not known to contain any historic resources, archaeological resources, or Native American human remains. However, the 2007 specific plan IS/MND notes that a Northwest Information Center records search identified a deeply buried habitation site (2.46 meters or 8 feet below ground) within the specific plan area. The exact location of the habitation site is not identified (specific plan IS/MND, page 66). Therefore, it is possible that these resources could be accidentally uncovered during grading and construction activities. In the event this should occur, the City’s standard conditions of approval associated with cultural resources would reduce potential impacts to a less-than-significant level.

- b. The proposed project has the potential to result in cumulatively considerable impacts in the areas of biological resources (habitat modifications and conflict with local plans, policies, ordinances), cultural resources (potential impact to unknown archaeological resources and accidental disturbance of human remains), geology and soils (erosion impacts during construction and potential impact to unknown paleontological resources during construction-related impacts), hydrology and water quality (erosion and runoff impacts), and tribal cultural resources (potential impact to unknown tribal cultural resources). However, with the implementation of Mitigation Measures BIO-1 and HYD-1, as well as the City's standard conditions of approval associated with cultural resources, impacts of the proposed project would not be cumulatively considerable.
- c. Based on the analysis provided in this initial study, the proposed project could indirectly cause substantial adverse effects to human beings through additional sources of polluted runoff, temporary construction criteria air pollutants, temporary construction toxic air contaminants, and temporary construction noise. However, as discussed throughout this initial study, the impacts would not be significant with implementation of mitigation measures or uniformly applied regulations. Therefore, the proposed project would not result in significant environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

E. SOURCES

Environmental Setting

Google Earth. 2024.

City of King. November 1998. *King City General Plan*.

<https://www.kingcity.com/DocumentCenter/View/258/King-City-General-Plan-PDF>

EMC Planning Group. November 30, 2024. Project Site Visit.

Project Description

City of King. August 15, 2016. *Zoning Code Amendments Initial Study/Mitigated Negative Declaration*. PDF.

City of King. Planning Commission Resolution No. 2018-236.

Cole-Breit Engineering. January 29, 2025. *Vertis Process Water Treatment Drawings*. Monterey, CA.

Morland, Tim, Director of Compliance, Safety, and Governmental Affairs, Vertis.

E-mail correspondence with consultant, 5 February 2025.

Skardon, John, Ph.D., Tailwater Systems, Email message to consultant via Paul Mansfield, Director of Facilities, Vertis, 1 April 2025.

Skardon, John Ph.D., Tailwater Systems. September 26, 2024. *Vertis Treatment Process Overview – Confidential*.

Tailwater Systems. 2024. “AquaReclaim: comprehensive, scalable, and flexible treatment process for Recycling Agricultural Drainage Water.”

Accessed on December 31, 2024.

<https://tailwatersystems.com/solutions-and-products/aquareclaim/>

Aesthetics

California Department of Transportation. 2018. “California State Scenic Highway System Map.”

Accessed on October 24, 2024.

<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

City of King. August 14, 2007 (amended through 2018). *East Ranch Business Park Specific Plan*.

Accessed January 20, 2025.

<https://www.kingcity.com/DocumentCenter/View/1012/East-Ranch-Business-Park-Specific-Plan-PDF>

Cole-Breit Engineering. January 29, 2025. *Vertis Process Water Treatment Drawings*. Monterey, CA.”

Agriculture

California Department of Conservation. “Important Farmland Finder.”

Accessed on October 24, 2024.

<https://maps.conservation.ca.gov/dlrp/ciff/>

California Department of Conservation. “Williamson Act Enrollment Finder.”

Accessed on October 24, 2024.

<https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>

Air Quality

Cole-Breit Engineering. January 29, 2025. *Vertis Process Water Treatment Drawings*. Monterey, CA.”

Monterey Bay Air Resources District. February 2008. *CEQA Air Quality Guidelines*.

chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/https://www.mbard.org/files/0ce48fe68/CEQA+Guidelines.pdf

Monterey Bay Air Resources District. March 15, 2017.

“2012 – 2015 Air Quality Management Plan.”

chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/https://www.mbard.org/files/6632732f5/2012-2015-AQMP_FINAL.pdf

Tailwater Systems. 2024. “AquaReclaim: comprehensive, scalable, and flexible treatment process for Recycling Agricultural Drainage Water.”

Accessed December 31, 2024.

<https://tailwatersystems.com/solutions-and-products/aquareclaim/>

Biological Resources

California Department of Fish and Wildlife (CDFW). 2024a. Biogeographic Information and Observation System (BIOS) online database.

<http://bios.dfg.ca.gov>

California Department of Fish and Wildlife (CDFW). 2024b. California Natural Diversity Database (CNDDDB) online database.

<https://wildlife.ca.gov/data/cnddb>

California Department of Fish and Wildlife (CDFW). 2024c. California Essential Habitat Connectivity Project. Sacramento, California.

<https://wildlife.ca.gov/Conservation/Planning/Connectivity/CEHC>

California Department of Fish and Wildlife (CDFW). 2024d. Conservation Plan Boundaries, HCP and NCCP. Sacramento California.

<https://apps.wildlife.ca.gov/bios6/?al=ds760>

- California Native Plant Society (CNPS). 2024a. Inventory of Rare and Endangered Plants of California online database.
<http://www.rareplants.cnps.org>
- California Native Plant Society (CNPS). 2024b. Manual of California Vegetation Online.
<https://vegetation.cnps.org/>
- City of King. November 1998. *King City General Plan*.
<https://www.kingcity.com/DocumentCenter/View/258/King-City-General-Plan-PDF>
- City of King. 2024. Municipal Code.
<https://ecode360.com/KI4948>
- Cornell Lab of Ornithology. 2024. *All About Birds* online database. Cornell Lab of Ornithology, Ithaca, New York.”
<https://www.allaboutbirds.org>
- Google Earth. 2024.
- Jameson, E. W., and Hans J. Peeters. 2004. *Mammals of California*. University of California Press.
- Nafis, G. 2023. *California Herps: A Guide to the Amphibians and Reptiles of California* online database. Accessed July 2024.
<http://www.californiaherps.com/>
- U.S. Fish and Wildlife Service (USFWS). 2024a. Endangered Species Program online database. Species list for King City. Washington, D.C.
<http://www.fws.gov/endangered/>
- U.S. Fish and Wildlife Service (USFWS). 2024b. National Wetlands Inventory online database. U.S. Department of the Interior. Washington, D.C.
<http://www.fws.gov/wetlands/>
- U.S. Fish and Wildlife Service (USFWS). 2024c. Critical Habitat for Threatened and Endangered Species online mapper.
<https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>
- U.S. Geological Survey (USGS). 2024. National Map Spot Elevation Data. Online mapper.
<https://apps.nationalmap.gov/viewer/>
- City of King. August 15, 2016. *Zoning Code Amendments Initial Study/Mitigated Negative Declaration*. PDF.

Cultural Resources

City of King. *Standard Condition of Approval Cultural Resources*. PDF.

Accessed on December 5, 2024.

County of Monterey. “Archaeological Sensitivity Map.”

Accessed on December 10, 2024.

<https://montereyco.maps.arcgis.com/apps/webappviewer/index.html?id=90ca28af371c482bac6ff01dd914fccf>

County of Monterey. “Monterey County Parcel Report Web App.”

Accessed on December 10, 2024.

<https://maps.co.monterey.ca.us/wab/parcelreportwebapp/>

County of Monterey. June 2020. “Monterey County Register of Historic Resources.”

Accessed on January 6, 2025.

<https://www.countyofmonterey.gov/home/showpublisheddocument/91136/638055721906300000>

Salinan Tribe, Monterey, San Benito. Patti Dunton, Administrator.

Email dated December 4, 2024.

Energy

California Energy Commission. 2022. “Electricity Consumption by County.”

Accessed December 16, 2024.

<https://ecdms.energy.ca.gov/elecbycounty.aspx>.

California Energy Commission. January 2017. “*Commission Guidebook Renewables Portfolio Standard Eligibility Ninth Edition (Revised)*.”

<https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard-0>

Geology and Soils

California Department of Conservation. “Earthquake Zones of Required Investigation.”

Accessed on November 7, 2024.

<https://maps.conservation.ca.gov/cgs/EQZApp/app/>

California Department of Conservation. “Reported California Landslides Map.”

Accessed on November 5, 2024

https://cadoc.maps.arcgis.com/apps/webappviewer/index.html?id=bc48ad40e3504134a1fc8f3909659041&_gl=1*1a5pk4*_ga*MTYxNzU4NTAyOC4xNjYxNTI5NzE5*_ga_N4MB98DBXY*MTcyMzEyMjE3My4xMS4wLjE3MjMxMjIxNzMuMC4wLjA

City of King. August 14, 2007. *2007 East Ranch Business Park Specific Plan Initial Study*.
Accessed on November 5, 2024.
(Page 66)

County of Monterey. September 2008. *2007 Monterey County General Plan EIR*.
Accessed on November 5, 2024.
<https://www.countyofmonterey.gov/government/departments-a-h/housing-community-development/planning-services/current-planning/general-info/2010-monterey-county-general-plan-adopted-october-26-2010/draft-environmental-impact-report-deir>
(Page 4.10-7)

County of Monterey. “Monterey County Parcel Report Web App.”
Accessed on November 5, 2024.
<https://maps.co.monterey.ca.us/wab/parcelreportwebapp/>

Greenhouse Gas Emissions

San Luis Obispo County Air Pollution Control District. August 9, 2023. CEQA Greenhouse Gas Thresholds & Guidance for the San Luis Obispo County Air Pollution Control District’s 2012 CEQA Air Quality Handbook and Related Guidance on Use of Screening Tool, CalEEMod, and Local Reductions/Sequestration Projects & Offset Mix Calculator.
https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/2023UpdatedSLOCountyAPCDCEQA-GHG_Guidance%26Thresholds-FINAL-StandAloneVersion.pdf

Hazards and Hazardous Materials

California Department of Forestry and Fire Protection. “Fire Hazard Severity Zones in State Responsibility Area.”
Accessed on November 10, 2024.
<https://calfireforestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>

California Department of Toxic Substances Control. “Envirostor – Hazardous Waste and Substances Site List (Cortese).”
Accessed on November 10, 2024.
https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29

California Environmental Protection Agency. “List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit (PDF).”
Accessed on November 10, 2024
<https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>

California Environmental Protection Agency. “List of “active” CDO and CAO from Water Board (MS Excel, 1,453 KB).”
Accessed on November 10, 2024

California Environmental Protection Agency. “List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.”
Accessed on November 10, 2024.
<https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/>

California State Water Resources Control Board. “List of Leaking Underground Storage Tank Sites.”
Accessed on November 10, 2024.
https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search

County of Monterey Airport Land Use Commission. February 16, 1978. “*Mesa Del Rey Airport Master Plan, King City, California.*”
Accessed January 3, 2025.
<https://www.countyofmonterey.gov/government/departments-a-h/housing-community-development/planning-services/advance-planning/library-ordinances-plans-under-development/airport-land-use-plans>

Google Earth. 2024. Accessed on November 10, 2024.

Hydrology and Water Quality

California State Water Resources Control Board. Cannabis General Order (Order WQ 2019-0001-DWQ)
Accessed on December 13, 2024.
https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf

Central Coast Regional Water Quality Control Board. Cannabis Regulatory Program.
Accessed on December 13, 2024.
https://www.waterboards.ca.gov/centralcoast/water_issues/programs/cannabis_cultivation/index.html

City of King. Industrial Wastewater Discharge Permit No. 2021-001.

Department of Water Resources. “Groundwater Basin Boundary Assessment Tool.”

Accessed on November 26, 2024.

<https://gis.water.ca.gov/app/bbat/>

Federal Emergency Management Agency (FEMA). “FEMA National Flood Hazard Layer Viewer.”

Accessed on November 26, 2024.

<https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>

Salinas Valley Basin Groundwater Sustainability Agency. January 13, 2022.

“*Salinas Valley Groundwater Basin Upper Valley Aquifer Subbasin Groundwater Sustainability Plan.*”

Accessed on November 26, 2024.

<https://svbgsa.org/wp-content/uploads/2022/04/Upper-Valley-Whole-GSP-Report-Only-20220414.pdf>

Noise

City of King. Code of Ordinances, Chapter 7.25.

Accessed on November 27, 2024.

<https://ecode360.com/44578696>

City of King. Code of Ordinances, Chapter 17.56.

Accessed on November 27, 2024.

<https://ecode360.com/44585910>

City of King. August 14, 2007. *2007 East Ranch Business Park Specific Plan Initial Study.*

Accessed on November 27, 2024.

(Page 66)

City of King. November 1998. *King City General Plan.*

Accessed on November 27, 2024.

<https://www.kingcity.com/DocumentCenter/View/258/King-City-General-Plan-PDF>

County of Monterey Airport Land Use Commission. February 1978. *Mesa Del Rey Airport Master Plan, King City, California.*

Accessed on November 27, 2024.

<https://www.countyofmonterey.gov/government/departments-a-h/housing-community-development/planning-services/advance-planning/library-ordinances-plans-under-development/airport-land-use-plans>

Public Services

City of King Police Department. Website.

Accessed on November 23, 2024.

<https://www.kingcity.com/164/Police-Department>

City of King Volunteer Fire Department. Website.

Accessed on November 23, 2024.

<https://www.kingcity.com/185/Fire-Department>

Google Earth. Accessed on November 4, 2024.

Monterey County Free Libraries. Website.

Accessed on November 23, 2024.

<https://www.countyofmonterey.gov/government/departments-i-z/library/locations/king-city-branch>

King City Union School District. Website.

Accessed on November 23, 2024.

<https://kcsd.org/en-US>

Transportation

Transportation Agency of Monterey County. 2022. *2022-2045 Monterey County Regional Transportation Plan*.

Accessed on November 23, 2024.

<https://www.tamcmonterey.org/regional-transportation-plan>

Tribal Cultural Resources

City of King. *Standard Condition of Approval Cultural Resources*. PDF.

Accessed on December 5, 2024.

Salinan Tribe, Monterey, San Benito. Patti Dunton, Administrator.

Email dated December 4, 2024.

Utilities and Service Systems

California State Water Resources Control Board. Cannabis General Order (Order WQ 2019-0001-DWQ)

Accessed on December 13, 2024.

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf

Central Coast Regional Water Quality Control Board. Cannabis Regulatory Program.

Accessed on December 13, 2024.

https://www.waterboards.ca.gov/centralcoast/water_issues/programs/cannabis_cultivation/index.html

Wildfire

California Department of Forestry and Fire Protection. “FHSZ Viewer.”

Accessed on October 24, 2024.

<https://calfireforestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>

County of Monterey. “Monterey County Parcel Report Web App.”

Accessed on November 5, 2024.

<https://maps.co.monterey.ca.us/wab/parcelreportwebapp/>

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