

DAHVIA LYNCH DIRECTOR

PLANNING & DEVELOPMENT SERVICES

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ASSISTANT DIRECTOR

December 3, 2021

CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Title; Project Number(s); Environmental Log Number:

Demler Brothers, LLC Manure Processing Facility Project; PDS2019-MUP19-004

- Lead agency name and address:
 County of San Diego, Planning & Development Services
 5510 Overland Avenue, Suite 110
 San Diego, CA 92123-1239
- 3. a. Contact Angelica Truong, Project Manager
 - b. Phone number: (619) 323-8950
 - c. E-mail: Angelica.Truong@sdcounty.ca.gov
- 4. Project location:

The project site is located in the Ramona Community Planning Area within the unincorporated area of the County of San Diego (County). The project site is located at 25818 State Route 78 (SR-78) (also known as Julian Road) between Rancho Santa Teressa Drive and Casner Road. Access to the site from SR-78 is provided by a private driveway located approximately 1,000 feet west of Rancho Santa Teressa Drive. The overall property on which the existing egg ranch is located spans five contiguous parcels [County Assessor Parcels (APN) 286-030-21, 286-030-22, 286-030-09, 286-031-01, and 286-040-10]. The proposed project would be located on a portion of APN 286-031-01 and 286-030-22.

5. Project Applicant name and address:

Demler Brothers, LLC 25818 Highway 78 Ramona, CA 92065

General Plan

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Community Plan: Ramona

Land Use Designation: Rural Lands 40 (RL-40)

Density: 1 du/40 acre(s)

Floor Area Ratio (FAR) N/A

7. Zoning

Use Regulation: A72 General Agriculture

Minimum Lot Size: 8 acre(s)
Special Area Regulation: A, POR S

8. Description of project

Demler Brothers, LLC (Applicant or Demler Brothers) proposes to construct a poultry manure processing facility (project or proposed project) that would process manure from the existing egg ranch operations and would not process manure from off-site locations. The existing Demler Brothers Egg Ranch currently houses roughly two million chickens that produce approximately 750 tons of manure per week. Henhouses on the ranch can accommodate up to three million chickens which could produce approximately 1,125 tons of manure per week. Three million chickens are allowed under the existing operations. The existing egg ranch is a by- right use under current County zoning and therefore not considered part of the proposed project nor the Major Use Permit (MUP) application (See Figure 1 Plot Plan).

Currently, the egg ranch has one method for manure collection for both the older and newer hen houses on-site (See Figure 2 Existing Project Site). Conveyor belts inside the hen houses transports the manure into semi-truck trailers, which then haul the manure off-site. However, manure from the older hen houses must be transported to the loading area near the new houses by on-site trucks. The older hen houses (approximately 700,000 chickens) produce approximately 260 tons of manure per week, which requires approximately 26 internal truck trips (truck with a loading capacity of 10 tons driving from the hen house to the semi-truck loading area and back to the hen house). The unprocessed manure is loaded into large semi-trucks and trucked off-site.

At full capacity (three million chickens) allowed under the existing permits regulating onsite operations, the egg ranch would produce approximately 48 truckloads of manure per week. Trucks are currently loaded Monday through Saturday from 4:00 am. to 3:00 pm. It typically takes approximately two to three hours to load one truck. The majority of the trucks leaving the site travel east to the Imperial Valley.

Proposed Operations

The Applicant proposes to construct a 16,200 square foot (sf) manure processing facility, which includes conveyor belt system, manure drying system, sanitation device, cooler, and pelleting mill.

The purpose of the proposed project is to convert poultry manure into valuable, and easily transportable, pellets on-site instead of transporting unprocessed manure off-site. The proposed project would reduce the total volume of manure per week by approximately 30

percent because the manure would be additionally dried and compacted into pellets. This would reduce the estimated truckloads generated per week from 48 to 30 (at full capacity; three million chickens), which would substantially cut down on traffic and emissions associated with the transport of manure from the site. The proposed project would also reduce the amount of ammonia and dust in the air, which would improve odor and air quality at the project site. Furthermore, as part of the proposed project the dried manure would be converted into organic fertilizer, which is highly desirable to farmers due to the substantial levels of nitrogen, phosphorus and potassium.

The proposed project would include three prefabricated 100 horse power electric manure processing units. The entire pelleting process would run on electricity and require no fuel, besides for the trucking of materials. The units could be scaled in phases to accommodate future growth. All machinery for the proposed project, besides conveyor belts and dryers would be located within the proposed 16,200 sf building.

The proposed operation would consist of the following features:

Manure Transport (Existing)

The proposed project would continue to use the existing manure collection methods within the hen houses. Currently, conveyor belts inside the hen houses transport the manure into semi-truck trailers, which then haul the manure off-site. Instead, manure would be collected and transported directly to the proposed manure processing system on-site. The newer hen houses immediately adjacent to the proposed project would have covered conveyor belts that would transport the manure from the hen houses into the proposed manure processing building. On the way to the building, the conveyor belts would pass through a drying system that is heated from hot air blown out from the existing fans of the henhouses. The conveyor belts would be self-automated and run on a set schedule. The older hen houses (approximately 700,000 chickens) would require the manure to be transported to the manure processing facility through the use of on-site trucks. The older hen houses would produce approximately 260 tons of manure per week which would require approximately 26 internal truck trips (truck with loading capacity of 10 tons driving from the hen house to the manure processing building and back to the hen house).

Manure Drying System (Dryer)

From the hen houses, the manure would then enter the drying system to prepare it for the pelleting mill. The dryer would have approximately four layers of perforated plates which are pulled through the dryer by means of a rolling chain. Instead of relying on additional energy inputs, the dryer would use the air from the hen houses via the existing fans, as well as the belts during the drying process to tumble and air dry the manure. The dried manure would then be conveyed from the drying system to the pelleting mill.

Pelleting Mill

The dried manure would then be deposited into the top shovel bunker of the pelleting mill to prepare the manure for the pelleting process. First, the manure would pass into a pin mixer where the manure is blended with a small amount of water to facilitate the molding/binding process and if necessary, additional minerals (e.g., nitrogen,

phosphorous, potassium) may be added to improve the quality of the fertilizer. These minerals can be purchased over the counter and are not considered hazardous materials or substances. The minerals would be stored in bags and placed on a pallet within the proposed building in a designated area. The manure would then be conveyed to the pelleting press where it would be steamed and pressed through a die to create a pellet. As the material is pressed through the die, a blade on the output side would spin around to cut the pellets to a desired length. Dies can be exchanged for larger or smaller diameter pellets depending on customer demands. The main benefit of pressing the manure into pellets is that pellets are easier to transport and market to customers. Due to the dry consistency of the manure, water is not a byproduct of palletization process. No water is discharged.

Additionally, an air cleaner would be installed in the building to mitigate potential manure dust and particulates generated by the pelleting process. The air cleaner would collect the dust/particulates and input them back into pelleting mill to reduce waste and improve efficiency of the operations. Doors and windows would remain closed during operation.

Sanitation Device

After the manure is pressed into pellets, the manure would be delivered to an electric sanitation device where the pellets are heated to 170-180 degrees Fahrenheit. The purpose of the sanitation device is to take the precautionary step of killing potential germs and pathogens that may be found in poultry manure, such as salmonella. By sanitizing the pellets, the fertilizer would be safer to transport and market to customers.

Cooler

During the pellet pressing and sanitation process, the pellets become soft and malleable. To resolve this issue, the pellets are sent through an electric cooling device to increase the hardness and integrity of the pellets. The cooling process also removes some of the remaining moisture. The final product would then be stored in elevated enclosed silos/bins for quick loading into semi-truck trailers. With implementation of the proposed improvements, it would take approximately 5-10 minutes to load a truck instead of the 2-3 hours under existing conditions. The final product would then be transported with bulk semi-truck trailers that carry approximately 25 tons per load. Annual output would be a condition of the MUP. As occurs under existing conditions, trucks would continue to be loaded Monday through Saturday from 4:00 am to 3:00 pm. The majority of the trucks leaving the property would continue to travel east to the Imperial Valley to deliver the pelleted manure while some of the pellet produced would be available to farmers in San Diego County.

The proposed project would be designed to operate fully automatically and would require limited maintenance. However, the proposed project may add two employees to the existing three employees for a total of five full-time employees (three employees currently employed on-site; two additional employees may be hired) who would monitor the equipment to ensure the system is operating properly and to assist with loading the pelleted manure onto delivery trucks. The manure processing system would operate every day of the year (besides holidays) from 6:00 a.m. to 10:00 p.m. (16 hours a day) as

conditioned in the MUP. The employees would work full-time, five days a week in a rotating schedule so the facility can operate seven days a week.

Vector Control

The proposed project includes a Vector Control Plan that identifies standard management practices to be employed in order to minimize vector breeding sources. The plan includes the following project design features.

A. Animal Waste Management

The following measures shall continue to be applied on-site to manage animal waste:

- Animal waste will be collected daily from the hen houses and either placed into an on-site container for temporary storage or directly transported to the manure processing facility via conveyor belt or on-site trucks.
- The temporary storage container will be rinsed out weekly (following manure removal) to prevent conditions that would support fly larvae, and adequate drainage would be provided for the rinse water.
- Manure will not be kept in the temporary storage container for a period exceeding one week.
- Animal waste will not be stored in an open storage mound on-site.

B. Mosquito Control

- Adequate drainage will be maintained, including rapid discharge of captured/pooled water, within the manure processing facility to promote drying and minimize the potential for ponding of water.
- Any water ponding on-site will not be allowed to remain standing for a period of more than 72 hours to avoid stagnation.
- Spilled animal waste will be disposed of promptly to minimize damp areas that may serve as insect breeding grounds.

C. Rodent Control

- Rodent traps and/or bait will be used (as needed) within the manure processing facility.
- Spilled manure will be promptly wetted to prevent airborne particles, swept up, and properly disposed of to discourage pest occurrence.

D. Fly Breeding Control

- Adequate equipment and personnel to implement the manure management programming for fly prevention and control shall be maintained at the manure processing facility.
- Appropriate pesticides, including traps and baits, shall be used to control adult fly
 operations. Pesticides to control all life stages of fly populations shall be approved
 by the State of California.
- Dropping boards and other equipment used in the drying process shall be cleaned frequently enough so that any larvae and pupae present cannot complete their life cycles.

Stormwater

The proposed project includes earthen swales along the east and west edges of the project site to direct runoff south and west towards two proposed storm water mitigation basins. The proposed basins would infiltrate and detain runoff to mitigate the peak flow from the site.

Construction

Construction activities associated with the proposed project would disturb 2.7 acres and are expected to start in the summer of 2022. Construction would last approximately six months. The proposed processing building would be constructed on a graded pad that was previously used as a location for additional hen houses. The project grading would include a balance scenario with approximately 3,000 cubic yards (cy) of earthwork with an additional estimated 800 cy of imported decomposed granite for placement around surrounding buildings. No improvements are required or proposed for the existing secondary access drive.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The project site is predominately barren landscape composed of previously-disturbed dirt surfaces and sparse vegetation due to historic and ongoing use by trucks and farming equipment traffic. Site topography is essentially flat open space that gradually slopes to the east and south beyond the development limits of the proposed improvements. The project site is mostly surrounded by agricultural uses though a sensitive residential receptor shares the eastern and southern property line with the project site with sensitive residential receptors approximately 1,300 feet away from the proposed operations.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
Major Use Permit	County of San Diego
Modification	
Time Extension	
Air Quality Permit to Construct	Air Pollution Control District
Air Quality Permit to Operate – Title V	Air Pollution Control District
Permit	
National Pollutant Discharge Elimination	Regional Water Quality Control
System (NPDES) Permit	Board
General Industrial Storm Water Permit	Regional Water Quality Control
	Board
General Construction Storm Water	Regional Water Quality Control
Permit	Board
Waste Discharge Requirements Permit	RWQCB
Fire District Approval	Ramona Fire Protection District

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11.				ulturally affiliated with the projectes Code §21080.3.1? If so, has
		YES	NO	
	requirements. Initial triba Campo, Jamul, Kwaa contacted. Viejas respo	al outreach was condu ymii, Manzanita, Sa onded and deferred to al consultation. All thre	cted on Ap nta Ysabe Santa Ysa e tribes ag	ursuant to Assembly Bill (AB) 52 ril 23, 2019. Eight tribes (Barona, el, Sycuan, and Viejas) were abel. Barona, Jamul, and Santa reed that neither a cultural study would be required.
	process allows tribal g discuss the level of envi to tribal cultural resour environmental review p also available from the Public Resources Code System administered by	povernments, public loronmental review, ideal reces, and to reduce to rocess (see Public Renative American Herican See §5097.96 and the Control of the Contr	ead agence ntify and ac he potenti sources Comr tage Comr California H of Historic	vironmental Quality Act (CEQA) ies, and project proponents to ddress potential adverse impacts al for delay and conflict in the ode §21083.3.2). Information is mission's Sacred Lands File per distorical Resources Information Preservation. Please also note sions specific to confidentiality.
check is a "F	ed below would be poter	ntially affected by this pact" or a "Less Than S	project and	D: The environmental factors I involve at least one impact that With Mitigation Incorporated," as
<u>A</u>	<u>esthetics</u>	☐ <u>Agriculture and Fo</u> Resources	orest [⊠ <u>Air Quality</u>
Bi	ological Resources	Cultural Resource	<u>s</u> [<u>Energy</u>
☐ <u>G</u>	eology & Soils	Greenhouse Gas		Hazards & Haz.
	ydrology & Water uality	Emissions ☐Land Use & Planr	_	Materials Mineral Resources
Po	opulation & Housing ecreation	☐ Public Services☐ Transportation		<u>Noise</u> □ Tribal Cultural Resources
<u>Ut</u> Syste	<u>illities & Service</u> ems	☐Wildfire		Mandatory Findings of Significance

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	RMINATION: (To be completed by the Lead A be basis of this initial evaluation:	Agency)	
	On the basis of this Initial Study, Planning & proposed project COULD NOT have a signific NEGATIVE DECLARATION will be prepared	cant effect on the environment, and a	
	On the basis of this Initial Study, Planning & although the proposed project could have a sthere will not be a significant effect in this cashave been made by or agreed to by the project NEGATIVE DECLARATION will be prepared	significant effect on the environment, se because revisions in the project ect proponent. A MITIGATED	
	On the basis of this Initial Study, Planning & proposed project MAY have a significant effective ENVIRONMENTAL IMPACT REPORT is required.	ect on the environment, and an	
Signa	ature	Date	
	lica Truong	Land Use/Environmental Planner	
Printe	Printed Name Title		

INSTRUCTIONS ON 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 will 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 on-site, 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 Incorporated, 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 Environmental Impact Report (EIR) is required.
- 4. "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 Analysis 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 Incorporated," describe the mitigation measures that 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. 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

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I.	AES proje		c Res	ources Code Section 21099, Would the
a)	Н	ave a substantial adverse effect on a so	cenic \	vista?
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

No Impact: The project site is located in the community of Ramona. The proposed project is not located near or within, or visible from, a scenic vista as designated in the County General Plan or the Ramona Community Plan. The proposed project would not substantially change the composition of an existing scenic vista in a way that would adversely alter the visual quality or character of the view.

The proposed project is located at the existing Demler Brothers Egg Ranch. The proposed manure processing building would have a maximum height of 34 feet. In addition, the project would house six 35 feet tall silos designed for storing the dried manure pellets. The height of proposed building and silos would be comparable to the existing hen houses which are 34 feet tall. Therefore, the proposed project would not have an adverse effect on a scenic vista. In addition, the project would require a minimal amount of land alteration with approximately 3,000 cy of earthwork with an additional estimated 800 cy of imported decomposed granite for placement in between existing buildings. No improvements are required or proposed for the existing secondary access drive. The project is compatible with the existing visual environment in terms of visual character and quality. Therefore, the proposed project will not have a substantial adverse effect on a scenic vista.

In addition, the project would not result in cumulative impacts on a scenic vista as the projects listed in Section XXI b) are not expected to result in significant impacts to scenic vista because they would be require to adhere to development and design standards that would not cause view blockage of the designated scenic vistas. Therefore, the project would not contribute to a cumulatively considerable impact related to scenic vistas.

b)		Potentially Significant Impact Less Than Significant With Mitigation Incorporated Less Than Significant With Mitigation Incorporated Less Than Significant With Mitigation Incorporated		
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Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

Less Than Significant Impact: There are no State scenic highways in the vicinity of the project site.

The existing egg ranch is accessed off SR-78. SR-78 is a designated state scenic highway from the western boundary of the Anza Borrego Desert State Park to the eastern boundary. The portion adjacent to the project location is not designated as a state scenic highway. The County's General Plan designates this portion of SR-78 as a County scenic highway. The proposed project would be located approximately 1,300 feet south of SR-78 at the existing Demler Brothers Egg Ranch. The project is compatible with the existing visual environment in terms of visual character and quality because the manure processing facility would be added to the project site in proximity to the existing hen houses and structures and would be setback off SR-78.

As stated in Response 1a), above, the height and composition of the proposed manure processing facility would be comparable to existing hen houses on site. The proposed project would be located east of existing facilities and would primarily be visible from motorists travelling northwest on SR-78. Motorists traveling southeast would be afforded partial views as shown in Figure 3. However, implementation of the proposed manure processing facility would result in a less than significant impact due to the distance from the highway, intermediate vegetation/landscape, the scale of the project and travelling speed of motorists.

The project would not result in cumulative impacts on a scenic highway because the project and the projects listed in Section XXI b) are not located within a state scenic highway. Therefore, the project would not contribute considerably to a cumulative impact to state scenic highways. Therefore, the project would not result in any adverse project or cumulative level effect on a scenic resource within a State scenic highway.

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c)	pı ex ar	non-urbanized areas, substantially degublic views of the site and its surrounding experienced from publicly accessible vanges, would the project conflict with applications quality?	igs? (F tage p	point). If the project is in an urbanized
]		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact
Disc	ıssi	on/Explanation:		
lands elem domi	scap ents nan	pe within a viewshed. Visual characte s line, form, color, and texture. Visual	er is b chara al qua	the objective composition of the visible ased on the organization of the pattern acter is commonly discussed in terms of lity is the viewer's perception of the visual y and expectation of the viewers.
proje the s area. and c	ct wite a Th	vould not substantially degrade the exist and its surroundings as the proposed pa e project is compatible with the existing	ting vis roject visua ity wou	the community of Ramona. The proposed sual character or quality of public views of would not introduce new land uses to the I environment in terms of visual character ald be added to the project site in proximitying egg ranch.
proce would Rand bulk,	essi d be ch.] and	ng facility would be comparable to exise located approximately 1,300 feet sout The proposed project would be located of the color as the existing structures onsite	ting hohe of Seast of the contract of the cont	d composition of the proposed manure en houses on site. The proposed project R-78 at the existing Demler Brothers Egg f existing facilities and be similar in scale, Figure 3). Therefore, the addition of the buld result in a less than significant impact.
publi the p desig	c vio proje gn g ontr	ews. The projects listed in Section XXI ect and would be required to comply wuidelines and would be compatible with	b) are ith the their s	the existing visual character or quality of located within the viewshed surrounding County's and Ramona Community Plan urroundings. Therefore, the project would ated to visual character or quality of public
d)		reate a new source of substantial light of ghttime views in the area?	or glar	e, which would adversely affect day or
[Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

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Discussion/Explanation:

Less Than Significant Impact: The Light Pollution Code (Section 51.201-51.209) was developed by the County Planning & Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources of light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects would not contribute to a cumulatively considerable impact. Therefore, compliance with the Code ensures that the project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

The proposed project would use outdoor lighting with 40-watt light emitting diode (LED) light fixtures and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 35 miles from the Palomar Observatory. While the proposed project would include outdoor lighting, the implementation of the project would not adversely affect nighttime views or astronomical observations, because the project would conform to the Light Pollution Code, including the B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. Compliance with the Code, in combination with the outdoor lighting and glare controls listed above, would ensure that the project would not create a significant new source of substantial light or glare. Therefore, impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

໌ (I a	mportant Farmland), as shown on the m	aps pr	Farmland of Statewide or local Importance repared pursuant to the Farmland Mapping Resources Agency, or other agricultural
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less than Significant Impact. The project site is located at the existing Demler Brothers Egg Ranch. The site is designated as Prime Farmland pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. In addition, the lands surrounding the project site are designated as Farmland of Statewide Importance. The Applicant proposes to construct a manure processing facility that would be capable of converting poultry manure into organic fertilizer pellets. The egg ranch would continue with its existing operation while

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accommodating the new manure processing facilities. The proposed use is consistent with the mapped designation and would not result in the conversion of Prime Farmland to non-agricultural use. Impacts would be less than significant.

b)	С	onflict with existing zoning for agricultur	al use	, or a Williamson Act contract?
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact
Dis	cussi	on/Explanation:		
cor fac The pro	nsider ility th e egg cessi	red to be an agricultural zone. The Applicated to be an agricultural zone. The Applicated to allow the existing on-site egg reanch would continue with its existing o	cant pi anch t peration	oned A72 (General Agriculture), which is roposes to construct a manure processing to become more efficient and sustainable. On while accommodating the new manure considered a compatible use in the A72 perations onsite.
as allo cor	the powed	proposed use is for agriculture purpose uses in the contract. Therefore, imple	es, the ementa	art of a Williamson Act contract. However, proposed project is consistent with the ation of the proposed project would not Villiamson Act contract. Impacts would be
listo wo pro	ed in uld re pose	Section XXI b) could conflict with existsult in a significant impact to agricultura	ting zo al reso	tive impact. Development of the projects oning or the Williamson Act Zone, which curces in the region. However, the project ract. Therefore, the project's contribution
c)	Reso section	lict with existing zoning for, or cause rezources Code section 12220(g)), or timberon 4526), or timberland zoned Timberland section 51104(g))?	rland	(as defined by Public Resources Code
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

No Impact: The project site does not contain forest lands or timberland. The County does not have any timberland zoned Timberland Production. In addition, as noted in Response 2c), above, the project is consistent with existing zoning onsite (A72). Therefore, project

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implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones. Impacts would be less than significant.

Furthermore, the project would not result in cumulative impacts. The projects listed in Section XXI b) do not contain forest lands or timberland. Therefore, development of cumulative projects would not conflict with existing zoning for or cause rezoning of forest land, timberland or timberland production zones. The project's contribution would not be cumulatively considerable.

	' '		,
Ó		nt, wh	of forest land to non-forest use, or involvenich, due to their location or nature, could use?
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact
Discussi	ion/Explanation:		
Code so	ection 12220(g), therefore project imp	pleme additi	rest lands as defined in Public Resources ntation would not result in the loss or on, the project is not located in the vicinity
XXI b) of Therefore	do not contain forest lands as defined re, development of cumulative projects	l in Po woul	ve impacts. The projects listed in Section ublic Resources Code section 12220(g). d not result in the loss or conversion of models and the considerable.
C	•	armlar	ent which, due to their location or nature, and or other agricultural resources, to non-non-forest use?
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact
Discussi	ion/Explanation:		

Less than Significant. Refer to Responses 2a) and 2c), above. The project site currently operates as a commercial agricultural operation. The project site is zoned A72 (General Agriculture), which is considered to be an agricultural zone. As the proposed project would assist current agriculture operation onsite, the proposed project is considered a compatible use in the A72 zone. The project site is mostly surrounded by agricultural uses though a sensitive residential receptor shares the eastern and southern property line with the project site with sensitive residential receptors approximately 1,300 feet away from the proposed operations.

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As the proposed project is compatible with the agriculture uses onsite and compatible with surrounding uses, the proposed project would not involve changes in the existing environment that would result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use. Impacts would be less than significant.

<u>III. AIR QUALITY</u> -- 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:

a)	onflict with or obstruct implementation RAQS) or applicable portions of the Stat	San Diego Regional Air Quality Strategy lementation Plan (SIP)?
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated	Less than Significant Impact No Impact

Discussion/Explanation:

Less Than Significant Impact: Analysis in this section is based on the Air Quality Assessment that was prepared by Ldn Consulting Inc. on October 13, 2021. The San Diego Air Pollution Control District (SDAPCD) is the local agency responsible for the administration and enforcement of air quality regulations in San Diego County. The air district regulates most air pollutant sources, except for motor vehicles, marine vessels, aircraft, and agricultural equipment, which are regulated by California Air Resources Board (CARB) or the US Environmental Protection Agency. State and local government projects, as well as projects proposed by the private sector, are subject to SDAPCD requirements if the sources are regulated by the district. Additionally, the SDAPCD, along with CARB, maintains and operates ambient air quality monitoring stations at numerous locations throughout San Diego County. These stations are used to measure and monitor criteria and toxic air pollutant levels in the ambient air.

The SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The San Diego County Regional Air Quality Strategy (RAQS) was initially adopted in 1992. The RAQS outlines the air district's plans and control measures designed to attain the state air quality standards for ozone. The SDAPCD has also developed input to the State Implementation Plan (SIP), which is required under the federal Clean Air Act for pollutants that are designated as being in nonattainment of the NAAQS for the basin.

According to the Air Quality Assessment, the project is consistent with the current A72 (General Agriculture) zoning, per the County's General Plan, and all operational trips would be accounted for in the General Plan. Because the proposed project is allowed under the General Plan land use designation, which is used in SANDAG growth projections, it is consistent with SDAPCD RAQS and portions of the SIP. Furthermore, the proposed project would not conflict with the implementation of the RAQS. As such, the project is considered consistent with the RAQS and

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the SIP. Therefore, the project would not conflict with or obstruct the implementation of the RAQS or SIP and impacts would be less than significant.

In addition, SANDAGs future growth projections are based on the General Plans of local jurisdictions. For this reason, development consistent with the applicable General Plan would also be consistent with the RAQS and SIP. Cumulative development is not anticipated to result in significant impacts in terms of conflicting with the RAQS and SIP because the cumulative projects listed in Section XXI b) would be consistent with the County's General Plans and the growth anticipated under the plans. Therefore, proposed project would not contribute to a cumulative impact related to conflicting with or obstructing implementation of the RAQS or SIP.

b)	•	ease of any criteria pollutant for which the icable federal or state ambient air quality
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated	Less than Significant Impact No Impact

Discussion/Explanation:

San Diego County is presently in non-attainment for the 8-hour concentrations for Ozone (O₃) under the California Ambient Air Quality Standard (CAAQS) and National Ambient Air Quality Standard (NAAQS). San Diego County is also in non-attainment for 1-hour concentrations for O₃ under the CAAQS. San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter (PM) less than or equal to 10 microns (PM₁₀) and PM less than or equal to 2.5 microns (PM_{2.5}) under the CAAQS. O₃ is formed when volatile organic compounds (VOC) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands. Sources of PM_{2.5} include: fireplaces, car engines, and coal- or natural gas–fired power plants.

Less Than Significant Impact: The County has identified significance screening level thresholds (SLT) which incorporate SDAPCD's established air quality impact analysis trigger levels for all new source review (NSR) in SDAPCD Rule 20.2 and Rule 20.3. These SLTs identified in the County Guidelines can be used as numeric methods to demonstrate that a project's total emissions (e.g., stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. SLTs for VOCs are based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which is more appropriate for the San Diego Air Basin). The County's SLTs and SDAPCD's trigger levels were developed in support of State and federal ambient air quality standards that are protective of human health.

Air quality emissions associated with the project include emissions from both construction and operation of the project. The project includes 3,000 cy of grading with a balance of cut and fill. In addition, the project would import approximately 800 cy of decomposed granite for placement between existing buildings. Construction emissions for the project were quantified in pounds per day from the construction activities as shown in Table 1. As shown the emissions for each pollutant type, reactive organic gas (ROG), Carbon Dioxide (CO), and PM, are well below the SLT set forth by the SDAPCD. However, to further reduce emissions, the project would be required as a condition of approval to use Tier III or better construction equipment during all construction phases. Therefore, construction of the project would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

Table 1: Summary of Construction Emissions

Year	ROG	NOx	СО	SO ₂	PM ₁₀ (Dust)	PM ₁₀ (Exhaust)	PM ₁₀ (Total)	PM _{.25} (Dust)	PM _{2.5} (Exhaust	PM _{2.5} (Total)
2021	9.12	15.90	20.09	0.03	6.85	0.15	6.94	3.45	0.15	3.53
Screenin g-Level Threshol d (lb/day)	75	250	550	250	-	-	100	-	-	55
Impact?	No	No	No	No	-	-	No	-	-	No

Source: Appendix A

Notes: ROG=reactive organic gas, NOx=nitrogen oxides, CO=carbon dioxide, SO2=sulfur dioxide, PM₁₀=particulate matter less than 10 microns, PM2.5=particulate matter less than 2.5 microns

The first full year of operations from the manure processing operation would be expected in 2022. Although the project is estimated to result in a reduction from 48 to 30 truck trips per week and result in no change in employee commute trips, the Air Quality Assessment (Appendix A) provided a conservative emissions analysis by estimating the project to have 60 truck trips per week and 60 employee trips per week. Emissions generated by truck trips and employee trips were estimated in separate modeling runs to account for the differences in trip length. Additionally, the model was run for the winter and summer scenarios to capture yearly operations to determine maximum daily operational emissions.

The estimated daily pollutant generation was calculated utilizing the average daily miles traveled and the expected emissions inventory calculated by air quality modeling software. The daily pollutants calculated for summer and winter are shown Tables 2 and 3 respectively.

Table 2: Summary of Summer Daily Operational Emissions

	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Area	0.450	0.000	0.000	0.000	0.000	0.000
Energy	0.000	0.000	0.000	0.000	0.000	0.000
Mobile	0.023	0.102	0.334	0.001	0.115	0.031
(Employees)						
Mobile	0.328	9.178	3.049	0.039	1.040	0.310
(Trucks)						
Total	0.801	9.280	3.383	0.040	1.155	0.341

Screening- Level	75	250	550	250	100	55
Threshold						
Significant?	No	No	No	No	No	No

Daily pollutant generation assumes trip distances within California Emissions Estimator Model (CalEEMod)

Emissions are reported as rounded numbers.

Source: Appendix A

Notes: ROG=reactive organic gas, NOx=nitrogen oxides, CO=carbon dioxide, SOx=sulfur oxides, PM10=particulate matter less than 10 microns, PM2.5=particulate matter less than 2.5 microns

Table 3: Summary of Winter Daily Operational Emissions

	ROG	NOx	СО	SOx	PM ₁₀	PM _{2.5}
Area	0.450	0.000	0.000	0.000	0.000	0.000
Energy	0.000	0.000	0.000	0.000	0.000	0.000
Mobile (Employees)	0.022	0.106	0.318	0.001	0.115	0.031
Mobile (Trucks)	0.329	9.440	3.065	0.039	1.040	0.310
Total	0.801	9.546	3.383	0.040	1.155	0.341
Screening-Level Threshold	75	250	550	250	100	55
Significant?	No	No	No	No	No	No
Daily wally tank garagetian accounts this distances within CalCEMad						

Daily pollutant generation assumes trip distances within CalEEMod Emissions are reported as rounded numbers.

Source: Appendix A

Notes: ROG=reactive organic gas, NOx=nitrogen oxides, CO=carbon dioxide, SOx=sulfur oxides, PM10=particulate matter less than 10 microns, PM2.5=particulate matter less than 2.5 microns

As shown on Tables 2 and 3, the project's daily pollutant generation is well below the SDAPCD operational air quality SLTs. Therefore, operational air quality impacts associated with the cumulatively considerable net increase of any criteria pollutant would be less than significant.

Cumulative construction impacts would exist when multiple construction projects occur at the same time and when those construction project maximum exposure contours intersect. To illustrate this, if a project were to produce air quality emissions simultaneous to a nearby construction project the addition of both project emissions could exceed significance thresholds. For this project, the construction emissions are well below significance as shown in Table 1 above. If a nearby project was to be under construction at the same time, that project would need to produce significantly more emissions and be relatively close to the proposed project site. Based on discussions with the Project Applicant, no known cumulative construction projects have been identified within a 0.5-mile radius of the project site. In addition, the project's operational emissions are below the significance thresholds established by the County guidelines for determining significance therefore a significant cumulative impact would not result, and the proposed project's contribution to such an impact would be less than cumulatively considerable. Therefore, cumulative construction and operational impacts would be less than significant.

c)	Expose sensitive receptors to substar	ntial pollu	tant concentrations?	
	☐ Potentially Significant Impact		Less than Significant Impac	ار

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\boxtimes	Less Than Significant With Mitigation	No Impact
	Incorporated	No impaci

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County also considers residences as sensitive receptors since the residences house children and the elderly.

Less Than Significant Impact With Mitigation Incorporated: The project site is mostly surrounded by agricultural uses, however, an existing residence shares the eastern and southern property line with the project site. The residence is located approximately 1,300 feet from the manure processing facility. The proposed project would not introduce a new sensitive receptor.

Diesel Particulates

According to the County Guidelines for Determining Significance – Air Quality (County of San Diego 2007), for typical land use projects that do not propose stationary sources of emissions regulated by SDAPCD, Diesel Particulate Matter (DPM), is the primary Toxic Air Contaminant (TAC) of concern. CARB identified DPM as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer time period. Health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, are typically based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with a project.

SDAPCD Rule 1210 implements the public notification and risk reduction requirements of State law and requires facilities with high potential health risk levels to reduce health risks below significant risk levels. In addition, Rule 1200 establishes acceptable risk levels and emission control requirements for new and modified facilities that may emit additional TACs. Under Rule 1200, a significant impact would occur when emissions of TACs would result in an incremental cancer risk greater than one in one million without application of Toxics-BACT (T-BACT), or an incremental cancer risk greater than 10 in one million with application of T-BACT, or a health hazard index (chronic and acute) greater than one.

Project construction would result in short-term emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment. The maximum daily particulate emissions, which include DPM was found to be 53.7 in one million which would be above the threshold of one in one million without application of T-BACT. Therefore, construction-related emissions of TACs has the potential to expose sensitive receptors to substantial emissions of TACs and impacts would be significant.

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Implementation of the following mitigation measure would reduce impacts to a less than significant level.

Mitigation Measure AQ-1. Construction Equipment. In accordance with SDAPCD Rule 20.2, the project is required to implement T-BACT equipment (Tier III or better) or impose the most effective emission limitation, emission control device or control technique to reduce the cancer risk.

Implementation of Mitigation Measure AQ-1 would reduce the DPM to 6.48 in one million which would be below the threshold of 10 in one million with the implementation of T-BACT equipment. Therefore, construction impacts to sensitive receptors would result in less than significant with mitigation incorporated.

Carbon Monoxide

The proposed manure processing facility would include a poultry manure pelleting system which would allow the existing on-site egg ranch to process manure into pellets on-site rather than ship the unprocessed manure off-site. Based on the Air Quality Assessment prepared by Ldn Consulting, Inc., October 2021, the project would not place sensitive receptors near carbon monoxide hotspots. The proposed project would reduce the maximum truckloads generated per week from 48 to 30 (at full capacity; three million chickens) and would generate fewer trips then the existing condition. Therefore, the proposed project would not add enough trips to the nearby roadway networks to exceed thresholds requiring a CO hotspot analysis. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

In addition, implementation of projects listed in Section XXI b) could have the potential to result in CO hot spots because of increased congestion; however, air emissions from project operation, including emissions of CO, would be well below significance thresholds. The overall net vehicle trips associated with the proposed project would be minimal. In addition, construction of cumulative projects similar to the proposed project could result in the generation of construction related TAC emissions that could pose or contribute to a health risk. Projects listed in Section XXI b) would be required to comply with applicable regulations and implement any required mitigation measures. Therefore, the project, together with other cumulative projects, would not result in a cumulatively considerable impact related to sensitive receptors.

d)	esult in other emissions (such as those ubstantial number of people?	e leading to odors) adversely affecting			
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact		

Discussion/Explanation:

Less Than Significant Impact: The project could produce objectionable odors, which would result from construction and operational activities. The project site is mostly surrounded by DEMLER BROTHERS, LLC
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agricultural uses. However, an existing residence shares the eastern and southern property line with project site and is located approximately 1,300 feet from the manure processing facility. Potential onsite odor generators would include short term construction odors from activities such as architectural coating (painting) and diesel equipment. Construction activities are fairly quick and are not expected to cause significant long-term odor impacts and impact would be less than significant.

Long term odors from the proposed project could result from the newly constructed manure processing facility. However, odors would be reduced from existing operations because the manure would be processed within a newly constructed 16,200 sf building which would include a ventilation filtration system. The filtration system would reduce many odors from chickens but would also filter ammonia a primary odor generating substance from poultry production. Furthermore, placement of the proposed project on the subject site would adhere to the required 1,000-foot setback requirements as outlined under San Diego County Zoning Ordinance Section 6902, Animal Waste Processing Setback. The existing operations are allowed by right and are considered part of the current environment at the project site. Because the manure processing facility would be consistent with Ordinance Section 6902 and would improve the existing condition on the project site, the project would not generate adverse impacts from odor. Throughout project operations, the project would be required to comply with SDAPCD nuisance rules which prohibit the discharge of any source of air contaminants or other material (including odors) which could cause annoyance to a considerable number of persons.

In addition, the project has prepared a Vector Control Plan that includes animal waste management practices that would help reduce odor at the site. Animal waste would be collected daily from the hen houses and either placed into an on-site container for temporary storage or directly transported to the manure processing facility via conveyor belt or on-site trucks. The temporary storage container would be rinsed out weekly following manure removal. Manure would not be kept in the temporary storage container for a period exceeding one week. In addition, animal waste would not be stored in an open storage mound on-site.

Moreover, the effects of objectionable odors are localized to the immediate surrounding area and would not contribute to a cumulatively considerable odor. A list of past, present and future projects within the surrounding area were evaluated (see Section XXI b)) and none of these projects create objectionable odors.

IV. BIOLOGICAL RESOURCES -- Would the project:

r r	Have a substantial adverse effect, either any species identified as a candidate, se egional plans, policies, or regulations, or Vildlife or U.S. Fish and Wildlife Service	nsitive r by th	e, or special status species in local or
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

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Less than Significant: The project site is predominately barren landscape composed of previously-disturbed dirt surfaces and sparse vegetation due to historic and ongoing use by trucks and farming equipment traffic. Site topography is essentially flat open space that gradually slopes to the east and south beyond the development limits of the proposed improvements. The project site has been completely disturbed and has been previously graded pursuant to approved L-grading permit number L15547.

Based on analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and photos of the site, it has been determined that no native vegetation communities or sensitive habitats exist on or adjacent to the site. Refer to Figure 4 – Vegetation Map for more information on the identified vegetation communities onsite. Furthermore, California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS) critical habitats for special-status plants are not mapped within or adjacent to the project area. Therefore, the project would not have a substantial adverse effect on any candidate, sensitive, or special status species and impacts would be less than significant.

In addition, implementation of projects listed in Section XXI b) could have the potential to result in impacts to species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS. All projects would be required to comply with applicable regulations and implement any required mitigation measures. The proposed project would result in a less than significant impact. Therefore, the project, together with other cumulative projects, would not result in a cumulatively considerable impact related to candidate, sensitive, or special status species

b) Have a substantial adverse effect on any riparian habitat or other sensitive community identified in local or regional plans, policies, regulations or by the Department of Fish and Wildlife or US Fish and Wildlife Service?					
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact		

Discussion/Explanation:

Less than Significant Impact: The project site is predominately barren landscape composed of previously-disturbed dirt surfaces and sparse vegetation due to historic and ongoing use by trucks and farming equipment traffic. Site topography is essentially flat open space that gradually slopes to the east and south beyond the development limits of the proposed improvements. The project site has been completely disturbed and previously graded per the approved L-grading permit, L15547. No riparian habitat exists on-site.

Based on an analysis of the County's GIS records and the County's Comprehensive Matrix of Sensitive Species, it has been determined that the proposed project site does not contain any riparian habitat or other sensitive natural communities as defined by the County Multiple Species Conservation Program (MSCP), County Resource Protection Ordinance (RPO), Natural

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Community Conservation Plan (NCCP), Fish and Wildlife Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies or regulations. Refer to Figure 4. Therefore, the proposed project would not have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS and impacts would be less than significant.

In addition, implementation of projects listed in Section XXI b) could have the potential to result in impacts to riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFW or USFWS. All projects would be required to comply with applicable regulations and implement mitigation measures. The proposed project would result in a less than significant impact. Therefore, the project, together with other cumulative projects, would not contribute to a cumulatively considerable impact related to riparian habitat or other sensitive natural community.

c)	bι	ave a substantial adverse effect on state or federally protected wetlands (including, ut not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, ydrological interruption, or other means?						
[Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact				

Discussion/Explanation:

Less than Significant Impact: Refer to Response IVa), above. Based on an analysis of the County's GIS records and the County's Comprehensive Matrix of Sensitive Species, there are two non-jurisdictional hydrological features and no RPO wetlands are located within the survey area. The two non-jurisdictional hydrological features consist of a small earthen roadside ditch excavated in the uplands along the southern border of the MUP area and an ephemeral drainage to the north of the MUP area. The ephemeral drainage is identified as a blue-line feature on the MUP. The project is located approximately 300 feet from this feature.

The project would not impact the identified features as the proposed project would not discharge, directly remove, fill, or hydrologically interrupt the identified features on the project site. The project would ensure complete avoidance of the features by implementing a development setback of 200 feet from the ephemeral drainage to protect the area from potential indirect impacts. Therefore, impacts to wetlands or waters of the U.S. as defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers would be less than significant.

In addition, implementation of projects listed in Section XXI b) could have the potential to result impacts to federally protected wetlands and would be required to comply with applicable regulations and implement any required mitigation measures. The proposed project would result in a less than significant impact. Therefore, the project, together with other cumulative projects, would not contribute to cumulatively considerable impact related to federally protected wetlands.

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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?					
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact		
Discuss	ion/Explanation:				
previous and farm the east	sly-disturbed dirt surfaces and sparse veg ning equipment traffic. Site topography is e	etatior essenti s of the	dominately barren landscape composed of due to historic and ongoing use by trucks ally flat open space that gradually slopes to proposed improvements. The project site or the approved L-grading permit.		
Sensitive of the monative re expected lacks su passing	e Species, it has been determined that the ovement of any native resident or migrator esident or migratory wildlife corridors, and the distance as a result of the proposed project for the proposed project for the transfer in the proposed project for the distance of the proposed project for the	e site I y fish o he use he follo projeo ding N	nd the County's Comprehensive Matrix of has limited biological value and impedance or wildlife species, the use of an established of native wildlife nursery sites would not be owing reasons: the site is highly disturbed, ot site and survey area lend more suitable atural Upland Habitats within Pre-Approved I Upland Habitats outside PAMA to the west		
native re	esident or migratory fish or wildlife specie corridors or impede the use of native wi	s or w	ntial adverse effect on the movement of any ith established native resident or migratory nursery sites. Impacts would be less than		
in impace establish nursery any requimpact.	cts to the movement of any native resident hed native resident or migratory wildlife sites. Projects would be required to coruired mitigation measures. The propose	lent or corrice mply wed proj er cum	n XXI b) could have the potential to result migratory fish or wildlife species or with dors, or impede the use of native wildlife with applicable regulations and implement ect would result in a less than significant mulative projects, would not contribute to a poridors.		
e) Conf	flict with any applicable policies protectir	ng biol	ogical resources?		
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact		

Discussion/Explanation:

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No Impact: Refer to Response IVa), above. The project site is currently developed with an existing egg ranch and contains no native vegetation communities or habitats; refer to Figure 4. The project is consistent with the County's Biological Mitigation Ordinance (BMO) and RPO. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts would occur.

f)	Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan?						
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			
Dis	cussi	on/Explanation:					
cor or Ma inc BM pro	No Impact: Refer to the attached Ordinance Compliance Checklist for further information on consistency with any adopted Habitat Conservation Plan, NCCP, other approved local, regional or state habitat conservation plan, including, Habitat Management Plans, Special Area Management Plans, or any other local policies or ordinances that protect biological resources including the MSCP, BMO, RPO, Habitat Loss Permit. The project is consistent with the MSCP, BMO and RPO. Therefore, development of the site as proposed would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. No impacts would occur.						
V . a)		FURAL RESOURCES Would the pro		nificance of a historical resource pursuant			
u)		15064.5?	io oigi	illiodrice of a filotofical resource parsuant			
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			

Discussion/Explanation: Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. By statute, CEQA is primarily concerned with two classes of cultural resources: "historical resources," which are defined in Public Resources Code (PRC) Section 21084.1 and CEQA Guidelines Section 15064.5; and "unique archaeological resources," which are defined in PRC Section 21083.2

Less than Significant Impact: Based on an analysis of County archaeology resource files, archaeological records, maps, and aerial photographs by County staff archaeologist, Donna Beddow, it has been determined that the project site does not contain any historical resources. Therefore, the project would not cause a substantial adverse change in the significance of a

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historical resource pursuant to 15064.5. Impacts would be less than significant. Furthermore, the project would not contribute cumulatively considerable impact related to historical resources.

uic pic	oject w	odia not contribute carrialatively con	Sidere	ible impact related to historical resources.		
b)		e a substantial adverse change in th ant to 15064.5?	e sign	ificance of an archaeological resource		
	Les	entially Significant Impact ss Than Significant With Mitigation orporated		Less than Significant Impact No Impact		
Discus	ssion/E	explanation:				
archae Donna resour Beddo and is	eologica Beddoces. Now. The locate	eal records, maps, aerial photograph ow, it has been determined that the lo resources were identified durin e project site has been graded histor	s, and projec g the rically	is of County archaeology resource files, a field visit by County staff archaeologist, t site does not contain any archaeological site visit by staff archaeologist, Donna pursuant to grading permit number 15547 chicken coop. The potential for discovery		
tribal of Manza to San agreed be red	outread anita, S ata Ysa d that n quired. cance	ch was conducted on April 23, 2019. Santa Ysabel, Sycuan, and Viejas) v bel. Barona, Jamul, and Santa Ysab neither a cultural study nor archaeolo Therefore, the project would not	Eight vere c el requ gical r caus	pursuant to AB-52 requirements. Initial tribes (Barona, Campo, Jamul, Kwaaymii, ontacted. Viejas responded and deferred uested formal consultation. All three tribes monitoring including a tribal monitor would e a substantial adverse change in the to 15064.5. Impacts would be less than		
In addition, implementation of projects listed in Section XXI b) could have the potential to result in impacts to the archaeological resources. Projects would be required to comply with applicable regulations and implement any required mitigation measures. The proposed project would result in a less than significant impact. Therefore, the project, together with other cumulative projects, would not contribute to cumulatively considerable impact related to archaeological resources.						
c)	Distur	b any human remains, including tho	se int	erred outside of dedicated cemeteries?		
	Les	entially Significant Impact ss Than Significant With Mitigation orporated		Less than Significant Impact No Impact		

Discussion/Explanation:

Less than Significant Impact: Based on an analysis of County archaeology resource files, archaeological records, maps, and aerial photographs by County staff archaeologist, Donna Beddow, it has been determined that the project would not disturb any human remains because

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the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. In addition, the potential for discovery is low.

If unknown resources are discovered during construction, the proposed project would comply with regulatory requirements for treatment of Native American human remains contained in California Health and Safety Code Sections 7050.5 and 7052 and California PRC Section 5097. Therefore, project would not disturb human remain and impact would be less than significant.

In addition, implementation of projects listed in Section XXI b) could have the potential to result in impacts to the archaeological resources. Projects would be required to comply with applicable regulations and implement any required mitigation measures. The proposed project would result in a less than significant impact. Therefore, the project, together with other cumulative projects, would not contribute cumulatively considerable impact related to human remains.

VI. ENERGY	Would the	project
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a)	Ilt in potentially significant environmenta cessary consumption of energy resourc	•	· · · · · · · · · · · · · · · · · · ·
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less than Significant Impact: The project would result in the use of electricity, natural gas, petroleum, and other consumption of energy resources during both the construction and operation phases of the project; however, the consumption is not expected to be wasteful, inefficient, or unnecessary.

Operations

The proposed project would include three prefabricated 100 horsepower/75-kilowatt electric manure processing units that would run the pelleting process. The electric motors have been designed to operate at optimal efficiency between 60 and 80 percent load (U.S. Department of Energy). The entire pelleting process would run on electricity and require no fuel, besides for the trucking of materials. Given the small amount of energy used for the proposed project, the proposed project would not have any unusual characteristics that would result in substantial or excessive long-term fuel consumption in the county.

In addition, operation of the proposed manure processing facility is expected to reduce both average daily trips (and associated gasoline usage) and carbon dioxide equivalent than the existing conditions at the egg ranch; refer to Section VII Greenhouse Gas and Section XVII, Transportation. In accordance with Mitigation Measure AQ-1 described above, Tier III certified construction equipment would be utilized during all phases of construction. Tier III diesel engine standards are the strictest Environmental Protection Agency (EPA) emissions requirement for off-highway diesel engines. This requirement regulates the amount of PM, or black soot, NO_x that can be emitted from an off-highway diesel engine. Tier III equipment also runs more

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efficiently and thus uses less energy resources. In addition, the project would be required to comply with the Construction and Demolition Materials Diversion Ordinance (Sections 68.508 through 68.518 of the County Code of Regulatory Ordinances). The ordinance requires that 90 percent of inert material and 70 percent of all other materials must be recycled from the project. In order to comply with the ordinance, applicants must submit a Construction and Demolition Debris Management Plan and a fully refundable Performance Guarantee prior to building permit issuance. This ultimately would result in less energy use overall as the demolished materials would be reused after recycling.

Therefore, for the reasons stated above, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant. Moreover, the project would not contribute to a cumulatively considerable impact. Projects listed in Section XXI b) would be required to comply with increasingly stringent statewide energy efficiency regulations, such as the Title 24 building standards to encourage energy-efficient development and land use patterns that reduce vehicle miles travelled (VMT). In the event that potential energy inefficiencies are identified for these projects, mitigation measures would be identified that would likely require that sustainability or energy efficiency features be incorporated into the project. Therefore, the project's contribution to cumulative impacts related to energy consumption would not be cumulatively considerable.

b)	Confl	ict with or obstruct a state or local plan	for rer	newable energy or energy efficiency?
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less than Significant: Refer to Impact 3.5-1 and 3.5-2. The proposed project would follow applicable energy standards and regulations during the construction and operation phases. The project would be consistent with the County General Plan, including Conservation and Open Space Element Policies 14.10 and 17.2, which require the use of low-emission construction vehicles and reduction of solid waste during construction and operation. As stated above, the proposed project would implement Mitigation Measure AQ-1 which would require the use of Tier III certified construction equipment during all phases of construction. The proposed project would be built and operated in accordance with all existing, applicable regulations at the time of construction. For the reasons stated, the proposed project would not obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

VII. GEOLOGY AND SOILS -- Would the project:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or

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	based on other substantial eviden and Geology Special Publication		a known fault? Refer to Division of Mines		
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact		
Discussion/Explanation:					
Less Than Significant Impact: Southern California, including the project site, is subject to the					

Less Than Significant Impact: Southern California, including the project site, is subject to the effects of seismic activity because of active faults that traverse the region. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a state-designated Alquist-Priolo Earthquake Fault Zone. No known active faults transect or project toward the project site. The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. The project is located approximately 9 miles from the Elsinore Fault.

Although no active faults traverse the project site, all new development would be required to comply with the requirements of the Alquist-Priolo Fault Zoning Act and the California Building Code (CBC). CBC requirements address structural seismic safety and include design criteria for seismic loading and other geologic hazards, including design criteria for geologically induced loading that govern sizing of structural members, building supports, and materials and provide calculation methods to assist in the design process. The CBC includes provisions for buildings to structurally survive an earthquake without collapsing and measures such as anchoring to the foundation and structural frame design.

Because of the distance to the nearest fault and the magnitude of past seismic activity, the proposed project would neither negate nor supersede the requirements of the Alquist-Priolo Earthquake Fault Zoning Act, nor would the proposed project expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the current Alquist-Priolo Earthquake Fault Zoning Map. Therefore, impacts would be less than significant.

ii.	Strong seismic ground shaking?	
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated	Less than Significant Impact No Impact

Discussion/Explanation:

Less Than Significant Impact: Seismic activity poses two types of potential hazards for people and structures, categorized as either primary or secondary hazards. Primary hazards include ground rupture, ground shaking, ground displacement, subsidence, and uplift from earth

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Potentially Significant Impact

iii.

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movement. Secondary hazards include ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires.

The project site is in a seismically active region and could experience ground shaking associated with an earthquake along nearby faults. The project site is likely to be subjected to strong ground motion from seismic activity, similar to that of the rest of San Diego County and Southern California, due to seismic activity in the region as a whole. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the CBC. In addition, the County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit.

Therefore, compliance with the CBC and the County Code ensures the project would not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

Seismic-related ground failure, including liquefaction?

	Less Than Significant With Mitigation Incorporated	on \square	No Impact
Discussi	on/Explanation:		
strength effects, v than 50 friction. I	and exhibit fluid-like flow behavior. Lession with liquefaction generally restricted to feet. Liquefaction normally occurs in	oose gr saturat soils su n soils o	e phenomenon whereby soils lose shear canular soils are most susceptible to these sed or near-saturated soils at depths of less ch as sand in which the strength is purely other than clean sand. Liquefaction occurs a seismic event.
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Less than Significant Impact

The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, the site is not underlain by poor artificial fill or located within a floodplain. As such, there would be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. In addition, because liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

iv	. Landslides?	
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated	Less than Significant Impact No Impact

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Discussion/Explanation:

Less Than Significant Impact: Non-seismically induced landslides can be caused by water from rainfall, septic systems, landscaping, or other origins that infiltrate slopes with unstable material. The project site is generally flat.

The project site is not within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on United States Geological Survey (USGS) 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology. Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15 percent in grade because these soils are slide prone. Because the project is not located within an identified Landslide Susceptibility Area and the geologic environment has a low probability to become unstable, the project would not result in the exposure of people or structures to potential adverse effects from landslides. Impacts would be less than significant.

b)	Result in substantial soil erosion or the loss of topsoil?							
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact				
Dis	cussi	on/Explanation:						

Less Than Significant Impact: Soil erosion may result during construction of the proposed project, as grading and construction can loosen surface soils and make soils susceptible to the effects of wind and water movement across the surface.

According to the Soil Survey of San Diego County, the soils on-site are identified as 77-percent Fallbrook sandy loam, with slopes ranging from 5 to 9 percent (hydrologic soil type C); and approximately 23-percent Los Posas fine sandy loam, with slopes ranging from 5 to 9 percent (hydrologic soil type C). The onsite soils have an erodibility rating of "moderate" and/or "severe" as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. However, the project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils; would not alter existing drainage patterns; is not located in a floodplain, wetland, or significant drainage feature; and would not develop steep slopes.
- The project has prepared a Storm Water Quality Management Plan (SWQMP) dated December 2020, prepared by Michael Baker International. The plan includes the following Best Management Practices (BMP) to ensure sediment does not erode from the

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- project site: silt fencing, fiber rolls, sand and gravel bags, vegetation stabilizing planting, hydraulic stabilization hydroseeding, and bonded fiber matrix.
- The project involves grading. However, the project is required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE – EROSION PREVENTION) and 87.417 (PLANTING). Compliance with these regulations minimizes the potential for water and wind erosion.

Due to these factors, the project would not result in substantial soil erosion or the loss of topsoil on a project level.

Refer to Section X, Hydrology and Water Quality. The project requires a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. Adherence to applicable requirements and implementation of the appropriate BMPs would minimize the loss of topsoil during project construction. Additionally, the proposed project would be subject to conditions of the grading plan to ensure that the potential for erosion during project construction is minimized and water quality is maintained.

In addition, the project would not contribute to a cumulatively considerable impact because all the of past, present and future projects included on the list of projects that involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE – EROSION PREVENTION) and 87.417 (PLANTING); Order 2001-01 (National Pollutant Discharge Elimination System (NPDES) No. CAS 0108758), adopted by the San Diego Regional Water Quality Control Board (RWQCB) on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (Ord. No. 9424); and County Storm water Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426). Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered. Impacts would be less than significant.

c)	а	e located on a geologic unit or soil that result of the project, and potentially respreading, subsidence, liquefaction or co	ult in a	· · · · · · · · · · · · · · · · · · ·
[Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less than Significant Impact: Refer to XVII (4), above. Liquefaction and dynamic settlement of soils can be caused by strong vibratory motion due to earthquakes. Both research and historical data indicate that loose, saturated, granular soils are susceptible to liquefaction and dynamic settlement. Liquefaction is typified by a loss of shear strength in the affected soil layer, thereby causing the soil to behave as a viscous liquid. This effect may be manifested by excessive settlements and sand boils at the ground surface.

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The project proposes 3,000 cy of grading with a balance of cut and fill. In addition, the project would import approximately 800 cy of decomposed granite for placement between the existing buildings. In order to assure that any proposed buildings (including those proposed on the project site) are adequately supported (whether on native soils, cut or fill), a Soils Engineering Report is required as part of the Building Permit process. This report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the CBC. The report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to VI Geology and Soils, Question a., iii-iv listed above.

,	e located on expansive soil, as defined 1994), creating substantial direct or indir		ole 18-1-B of the Uniform Building Code ks to life or property?			
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			
Discussi	on/Explanation:					
that swe soils as by staff Agricultuidentified (hydrolo ranging behavior The projection Resist the	Less Than Significant Impact: Expansive soils contain significant amounts of clay particles hat swell considerably when wetted and shrink when dried. The project is located on expansive soils as defined within Table 18-I-B of the Uniform Building Code (1994). This was confirmed by staff review of the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. The soils on-site are dentified as 77-percent Fallbrook sandy loam, with slopes ranging from 5 to 9 percent hydrologic soil type C); and approximately 23-percent Los Posas fine sandy loam, with slopes ranging from 5 to 9 percent (hydrologic soil type C). These soil types have moderate shrink swell behavior. The project is required to comply the improvement requirements identified in the 1997 Uniform Building Code, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils, which ensure suitable structure					
•	property. Compliance with state and lo		te soils would not create substantial risks quirements would reduce impacts to less			
W	ave soils incapable of adequately supporastewater disposal systems where sew rastewater?					
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			

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Discussion/Explanation:

Less than Significant: The existing egg ranch is currently served by on-site septic tank systems. No additional modifications to the septic tank system are necessary as a result of the proposed project. Impacts would be less than significant.

f)	Directly or indirectly destroy a unique paleontological resource or site or unique geolog feature?								
		Potentially Significant Impact		Less than Significant Impact					
		Less Than Significant With Mitigation Incorporated	\boxtimes	No Impact					

San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

No Impact: A review of the County's Paleontological Resources Maps indicates that the project is located entirely on plutonic igneous rock and has no potential for producing fossil remains. The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features. No impacts would occur.

VIII GREENHOUSE GAS EMISSIONS -- Would the project:

a)	enerate greenhouse gas emissions, eit gnificant impact on the environment?	her d	irectly or indirectly, that may have a
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less Than Significant Impact: Greenhouse Gas (GHG) Emissions result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide (CO₂), methane (CH₄), halocarbons (HFCs), and nitrous oxide (N₂O), among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

An individual project's GHG emissions would generally not result in direct impacts under CEQA, as climate change is a global issue, however, an individual project could be found to contribute to a potentially significant cumulative impact. To standardize GHGs for analysis CH_4 and N_2O are converted to equivalent amounts of CO_2 and identified as carbon dioxide equivalent (CO_2e). This is the representative GHG commonly used for analysis.

Project Construction GHG Emissions

With respect to cumulative San Diego Air Basin-wide conditions, the SDAPCD has developed strategies to reduce short-term construction-related criteria air pollutant emissions and to reduce long-term mobile-source GHG emissions. The primary construction related GHG emissions would be from grading. Grading would include approximately 3,000 cy of earthwork balanced on site with an additional 800 cy of imported decomposed granite for placement between the existing buildings.

Utilizing the CalEEMod model, which is the model commonly used to evaluate GHG impacts in CEQA, construction of the project would produce 136.67 metric tons (MT) of CO₂e during the six month construction period (see Appendix B GHG Letter Report). Lead agencies, including the SDAPCD and the County of San Diego, recommend that construction emissions be amortized over a 30-year period to account for the contribution of construction emissions over a project's lifetime. Based on SCAQMD methodology, it is recommended to average the construction emissions over the project life which is assumed to be 30 years. Given this, the annual construction emission would be 4.56 MT of CO₂e per year.

Table 4 Annual Construction Emissions Summary

Year	Bio-CO ₂	NBio-CO ₂	Total CO ₂	CH₄	N ₂ O	CO ₂ e (MT)
2021	0.00	135.89	135.89	0.03	0.00	136.67
Total						136.67
Yearly Average Construction Emissions (Metric Tons/year over 30 years)						4.56

Source: Appendix B

Notes: CO₂=carbon dioxide, CH₄=methane, N₂O=nitrous oxide, CO₂e=carbon dioxide equivalent, MT=metric tons

These emissions are added to operational emissions to account for the contribution of construction to GHG emissions for the lifetime of the proposed project; refer to Table 6. Additionally, the construction manager would be required to comply with SDAPCD Rules 50, Visible Emissions, 51, Nuisance, and 55, Fugitive Dust Control and applicable best management practices such as using low-emission construction vehicles and equipment. These requirements are also imposed on cumulative projects throughout the San Diego Air Basin.

Project Operational GHG Emissions

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Operational emissions result from area, energy, mobile, and water sources. Solid waste was excluded from this analysis because the proposed project does not change waste generation from existing operations. The project would generate emissions of 862.34 MT of CO₂e per year. The primary source of emissions from project operation are truck trips for hauling of the manure, which account for 602.35 MT CO₂e per year (approximately 70 percent) (see Appendix B GHG Letter Report).

Table 5 Operational Emissions Summary

Year	Bio-BCO ₂	NBio-CO ₂	Total CO ₂	CH ₄	N₂O	CO₂e (MT/Yr)
Area	0.00	<1	<1	<1	<1	<1
Energy	0.00	240.64	240.64	0.01	0.00	241.46
Mobile (Employee Trips)	0.00	17.51	17.51	0.00	0.00	17.53*
Mobile (Truck Trips)	0.00	601.13	601.13	0.05	0.00	602.35
Water	0.00	1.00	1.00	0.00	0.00	1.00
Sub Total (MT/Year)						

Source: Appendix B

Notes: CO_2 =carbon dioxide, CH_4 =methane, N_2O =nitrous oxide, CO_2 e=carbon dioxide equivalent, MT=metric tons Solid waste was excluded from this analysis because the proposed project does not change waste generation from existing operations. The project would not result in a change in employee commute trips, however, this analysis includes an increase in 17.53 MT CO_2 e per year.

CEQA Guidelines section 15064.7(a) allows a lead agency to use a qualitative threshold to determine whether or not there is a significant impact on the environment. The County has discretion to rely on a qualitative analysis or performance-based standard to determine the significance of GHG impacts (CEQA Guidelines section 15064.4(a)(2)). The County would consider the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting (existing Demler Egg Ranch operations) as authorized by CEQA Guidelines section 15064.4(b)(1).

The purpose of the project is to convert poultry manure into valuable, and easily transportable, pellets on-site instead of transporting unprocessed manure off site. The project would reduce the total volume of manure per week by approximately 30 percent because the manure would be additionally dried and compacted into pellets. This would reduce the estimated truckloads generated per week from 48 to 30 (at full capacity; three million chickens), which would substantially cut down on traffic and emissions associated with the transport of manure from the site. As mentioned previously, the project's GHG emissions are primarily from truck trips that transport the manure and account for approximately 602 MT CO₂e. This number is from the conservative estimate of 60 truck trips per week, which equates to 10 MT CO₂e per year per truck trip. Based off this analysis, the project's reduction from 48 to 30 truck trips per week would result in a decrease in approximately 180 MT CO2e per year or a 38 percent reduction in truck emissions from existing operations. The project would not result in a change in employee commute trips, however, the analysis includes an increase in 17.53 MT CO2e per year. Therefore, the emissions for this project were conservatively assumed, because the 17.53 MT CO2e per year would not represent an increase above existing conditions. The project would be more efficient than the existing environmental setting (e.g., existing operations).

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As part of the proposed project, the dried manure would be converted into organic fertilizer, which is highly desirable to farmers due to the substantial levels of nitrogen, phosphorus and potassium. According to the California Department of Agriculture State Organic Program California Agricultural Organic Report for 2019 to 2020, organic production has increased 44 percent from 1,796,080.49 acres in 2014 to 2,590,328.41 acres in 2019. In 2019, sales of organic products in California totaled more than \$10.4 billion, which represents an increase of 3.5 percent from 2018. Organic is a term that indicates that the food or agricultural product has been produced using sustainable practices and without synthetic fertilizers, sewage sludge, irradiation, or genetic engineering. Organic farming practices support healthy soils and build and/or or maintain soil organic matter, which can sequester carbon and improve air and water quality. The project would provide organic fertilizer that may support organic farming in California.

Because the project would improve the existing operations of the egg ranch by reducing existing truck trips and associated GHG emissions to transport manure off site, the project would have a less than significant impact. Therefore, the project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

A screening threshold was used to illustrate that impacts from the project would be less than significant for GHG emissions. In response to AB 32, the California Air Pollution Control Officers Association (CAPCOA) white paper titled "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from projects Subject to the CEQA," provides a methodology used for jurisdictions across the state to identify a screening level for GHG emissions. The CAPCOA guidance states that projects should be screened to determine if their associated GHG emissions exceed 900 MT CO2e. Since adoption of this threshold, Senate Bill (SB) 32 was passed to set a revised statewide reduction target to reduce emissions to 40 percent below 1990 levels by year 2030.

As compared to similar mass emissions thresholds adopted by other regional air districts the CAPCOA 900 MTCO₂e threshold is relatively conservative and could be used to support cumulative impact determination beyond 2020. In April 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published updated project screening levels and determined that projects estimated to generate less than 1,100 MTCO₂e per year would not result in a significant, cumulative impact.⁴ This threshold was developed to demonstrate compliance with the statewide reduction targets of Senate Bill (SB) 32 by 2030.

³ California Air Pollution Control Officers Association. 2008. CEQA and Climate Change. Available: http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf. Accessed: December 17, 2020.

³ California Air Pollution Control Officers Association. 2008. CEQA and Climate Change. Available: http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf. Accessed: December 2020.

³ California Air Pollution Control Officers Association. 2008. CEQA and Climate Change. Available: http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf. Accessed: December 17, 2020.

⁴ Sacramento Metropolitan Air Quality Management District (SMAQMD). 2020. Greenhouse Gas Thresholds for Sacramento County. Available:

http://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf. Accessed. December 18, 2020.

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Thus, the CAPCOA threshold of 900 MTCO₂e represents a more stringent screening level than has been approved by other air districts in compliance with 2030 statewide reduction targets. Due to the aggressive GHG emission capture rate, the CAPCOA threshold could still act as a viable threshold to reduce project GHG emissions proposed after 2020 and meet SB 32 targets.

The GHG emissions generated from construction and operations are listed in Table 6 below. The construction emissions are amortized over a 30-year period to determine an annual rate added to annual operational emissions. The project would result in 866.9 MTCO₂e per year, which falls below the screening level threshold of 900 MTCO₂e. As mentioned previously, employee trips would not change with the project. The 17.53 MT CO₂e from employee trips are part of existing operations. Therefore, the total MT CO₂e is conservative. The project would not generate GHG emissions that would result in an impact when compared to the 900 MTCO₂e per year CAPCOA or 1,100 MTCO₂e per year SMAQMD screening thresholds. However, the project does not rely on the screening level thresholds to determine impact significance, rather to illustrate that the project would not cause a significant direct or cumulative impact from GHG emissions due to the relatively small amount of GHG emissions during operation and construction.

Table 6: Operational Emissions with Amortized Construction Emissions Summary MT/Year

Year	Bio-BCO ₂	NBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO₂e (MT/Yr)
Area	0.00	<1	<1	<1	<1	<1
Energy	0.00	240.64	240.64	0.01	0.00	241.46
Mobile (Employee Trips)	0.00	17.51	17.51	0.00	0.00	17.53
Mobile (Truck Trips)	0.00	601.13	601.13	0.05	0.00	602.35
Water	0.00	1.00	1.00	0.00	0.00	1.00
Sub Total (MT/Year)						862.34
Amortized Construction Emissions (30 year period)						4.56
Total Construction and Operations (MT/Year)						866.9

Source: Appendix B

Notes: CO2=carbon dioxide, CH4=methane, N2O=nitrous oxide, CO2e=carbon dioxide equivalent, MT=metric tons

Data is presented in decimal format and columns may not add due to rounding.

b)	onflict with an applicable plan, policy or e emissions of greenhouse gases?	regu	lation adopted for the purpose of reducing
	 Potentially Significant Impact		Less than Significant Impact
	Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: In 2005, the Governor of California signed Executive Order (EO) S-3-05. EO S-3-05 (June 2005) established the following statewide goals: GHG emissions

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should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80 percent below 1990 levels by 2050.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

SB 32 (enacted in 2016) set a new statewide GHG reduction target. More specifically, SB 32 codified a 2030 emissions reduction target that requires the CARB to ensure that statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030.

EO B-55-18 (September 2018) establishes a new statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." This executive order directs CARB to "work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal."

SB 375 passed in 2008, links transportation and land use planning with global warming. It requires the CARB to set regional targets for the purpose of reducing greenhouse gas emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing and transportation plans that meet SB 375 targets. SANDAG has prepared a Sustainable Communities Strategy for its Regional Transportation Plan. The strategy identifies how regional greenhouse gas reduction targets, as established by the Air Resource Board, would be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible. SANDAG also sets forth Smart Growth Principles for development in the region, which includes the preservation of farmland.

The County General Plan Guiding Principle 8 guides agriculture development in the unincorporated County with directive to preserve agriculture as an integral component of the region's economy, character, and open space network. The project would make the existing operations more efficient and produce organic fertilizer on site. This purpose supports General Plan Policy Conservation and Open Space 6.5 "Best Management Practices. Encourage best management practices in agriculture and animal operations to protect watersheds, reduce GHG emissions, conserve energy and water, and utilize alternative energy sources, including wind and solar power." 5

The project would reduce GHG emissions from the existing egg ranch operations by 180 MT CO₂e per year or a 38 percent reduction by reducing truck trips to haul manure. This would correspond to an equal reduction in the GHG emissions associated with existing operations truck trips. Because the project would reduce GHG emissions from the existing environmental setting, it would contribute to Statewide GHG reduction targets.

⁵ County of San Diego General Plan Guiding Principles and Conservation and Open Space Element. Accessed May 26, 2021 at <u>GP - Home (sandiegocounty.gov)</u>.

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The project would support sustainable agriculture and support farmland in the region consistent with SANDAG's Smart Growth Principles.⁶ The project would support the General Plan Guiding Principle 8 and Policy Conservation and Open Space 6.5, which are in part developed to promote sustainability and reduce GHG emissions. Therefore, the project would not contribute to a cumulatively considerable impact related to global climate change and would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

,	create a significant nazard to the public of transport, storage, use, or disposal of hat reasonably foreseeable upset and accident acardous materials into the environment	zardo ent co	us materials or wastes or through
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less Than Significant Impact: The term "hazardous material" can be defined in different ways. For this environmental document, the definition of "hazardous material" is the one outlined in the California Health and Safety Code, Section 25501:

Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as in the California Health and Safety Code, Section 25117, and in the California Code of Regulations, Title 22, Section 66261.2:

Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

⁶ San Diego Association of Governments. Smart Growth Principles. Accessed may 26, 2021 at: <u>SANDAG_B1_SmartGrowthPrinciples_PQ.pdf</u>.

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Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

Exposure of the public or the environment to hazardous materials could occur through the following: improper handling or use of hazardous materials or hazardous wastes, particularly by untrained personnel; transportation accidents; environmentally unsound disposal methods; and/or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or waste present, and the proximity of sensitive receptors.

Following is a discussion of the proposed project's potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during the construction and operational phases.

Construction of the proposed project would involve the use of limited amounts of potentially hazardous materials, including but not limited to solvents, paints, fuels, oils, and transmission fluids. However, materials used during construction would be contained, stored, and handled in compliance with applicable standards and regulations established by the Department of Toxic Substances Control (DTSC), the EPA, and the Occupational Safety and Health Administration. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Project operation would involve the use of common hazardous maintenance, landscape materials, and insect and rodent control (e.g., fertilizers, pesticides, herbicides, and cleaning solutions) that could be potentially hazardous if handled improperly or ingested. However, these products are not considered acutely hazardous and are not generally considered unsafe. Storage, handling, and disposal of hazardous materials during project construction and operation would comply with applicable standards and regulations. In addition, the proposed project would not generate significant amounts of hazardous materials. Therefore, the proposed project would have a less than significant impact associated with the routine transport, use, or disposal of hazardous materials.

On July 2019, the Department of Environmental Health (DEH) – Landfill Enforcement Agency (LEA) issued a Notice of Violation of Sections 17820 Agricultural Solid Waste as a Public Health/Well-being Hazard and Section 17823 Agricultural Wastes Management Practices due to presence of excessing flies, fly larvae, and improper management of chicken carcasses and discarded eggs related to the egg ranch use. On December 26, 2019, the LEA reviewed and accepted the Demler Brother's Egg Ranch Composting Plan as satisfying the corrective action directives of its Notice of Violation. Additionally, on November 25, 2019, the LEA conducted an inspection to evaluate compliance with Title 14 California Code of Regulations, of Sections 17820 Agricultural Solid Waste as a Public Health/Well-being Hazard and Section 17823 Agricultural Wastes Management Practices and found no excessive vectors, odors or adverse conditions related to health/well-being hazards were observed during the inspection of the egg ranch. The egg ranch operations are being conducted in accordance with the November 2019 Composting Plan.

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b)	Emit hazardous emissions or handle substances, or waste within one-quarter		rdous or acutely hazardous materials, f an existing or proposed school?			
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			
Discu	ssion/Explanation:					
The c		•	ter mile of an existing or proposed school. proximately 7 miles west of the proposed			
c)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?					
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			

Discussion/Explanation:

No Impact: Based on a regulatory database search, the project site has not been subject to a release of hazardous substances. The project site is not included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation Case Listing, the DTSC Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database), the Resource Conservation and Recovery Information System listing, the EPA's Superfund Comprehensive Environmental Response, Compensation, and Liability Information System database or the EPA's National Priorities List.

Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), is not on or within 1,000 feet of a Formerly Used Defense Site, does not contain a leaking Underground Storage Tank, and is not located on a site with the potential for contamination from historic uses such as industrial uses, a gas station or vehicle repair shop. Therefore, the project would not create a significant hazard to the public or environment. No impact would occur.

d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project

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	esult in a safety hazard or excessive noi rea?	se for	people residing or working in the project			
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			
Discussi	ion/Explanation:					
an Airpo the proje height, o Therefor	No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan, an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would not result a safety hazard for people residing or working in the project area.					
e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?						
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			
Discussi	ion/Explanation:					

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

 i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

Less Than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

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No Impact: The project would not interfere with the San Diego County Nuclear Power Station Emergency Response Plan because the project is located approximately 70 miles from San Onofre Nuclear Generating Station, which is the nearest nuclear facility. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element would not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan would not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

No Impact: The Dam Evacuation Plan would not be interfered with because the project is not located within a dam inundation zone.

f)	xpose people or structures, either direct r death involving wildland fires?	tly or i	ndirectly, to a significant risk of loss, injury
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is in a Very High Fire Hazard Severity Zone (VHFHSZ) according to the California Department of Forestry and Fire Protection. Fire hazard designations are based on topography, vegetation, and weather, among other factors, with more hazardous sites including steep terrain, unmaintained fuels/vegetation, and wildland urban interface locations. Development within or adjacent to areas designated as VHFHSZ and/or wildland-urban interface areas has the potential to exacerbate wildfire risk, particularly if it occurs in areas with steep topography and/or prevailing winds because these conditions contribute to the spread of and make it more difficult to contain wildfires.

The closest residence is located approximately 1,300 feet from the proposed facility. The project would not expose people or structures to a significant risk of loss, injury or death involving

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wildland fires because the project would comply with the regulations specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County. Implementation of these fire safety standards would occur during the building permit process. Also, a Fire Service Availability Letter, dated January 30, 2019, have been received from the County Service Area Fire Protection District. The conditions in this letter from the County Fire Authority include: a requirement of 100-feet of clearing around all structures. The Fire Service Availability Letter indicates the expected emergency travel time to the project site to be 1.84 minutes. The Maximum Travel Time allowed pursuant to the Safety Element is five minutes. Therefore, based on the review of the project by County staff, through compliance with the International Fire Code; California Fire Code; regulations set forth in Sections 13000 et seq. of the California Health and Safety Code; and Title 14, Division 1.5, of the California Code of Regulations, impacts would be less than significant. Moreover, the project would not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

X. HYDROLOGY AND WATER QUALITY -- Would the project:

a)	Violate any water quality standards or w substantially degrade surface or ground	• .
	Potentially Significant ImpactLess Than Significant With MitigationIncorporated	Less than Significant Impact No Impact

Discussion/Explanation:

Less Than Significant Impact: Construction of the proposed project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would require the use of heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff, could wash into and pollute receiving waters.

The project requires a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. A SWQMP for Priority Development Projects was prepared by Michael Baker (Appendix D). The SWQMP demonstrates that the project would comply with all requirements of NPDES General Permit. The project would be required to implement the following site design measures and/or source control BMPs and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable from entering storm water runoff: silt fence, fiber rolls, gravel and sand bags, vegetation stabilization planting, construction road stabilization, entrance/exit inspection and cleaning facility, stabilized construction entrance, spill prevention and control, material delivery and storage, waste management concrete waste management, and sanitary waste management. Adherence to applicable requirements and implementation of the appropriate BMPs would ensure that potential water quality degradation associated with construction activities would be minimized, and impacts would be less than significant.

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Operation of the manure processing facility could introduce potential pollutants such as chemicals pathogens from chicken manure, nutrients from fertilizer, pesticides and sediment from landscaping, pesticides from insect and rodent control, trash and debris, and oil and grease from vehicles. These pollutants could potentially discharge into surface waters and result in degradation of water quality. Runoff is expected to sheet flow from the processing building to the east and west. Earthen swales would be constructed along the east and west edges of the site to direct runoff south and west towards two storm bioretention basins. Bio-retention basins remove coarse sediment, trash, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides. The pelletization plant and the pelleting operation is located within an enclosed structure. The conveyor belts transporting the manure from the chicken houses to the plant would be covered.

In addition, animal waste would be collected daily from the hen houses and either placed into an on-site container for temporary storage or directly transported to the manure processing facility via conveyor belt or on-site trucks. The temporary storage container would be rinsed out weekly (following manure removal) to prevent conditions that would support fly larvae, and adequate drainage would be provided for the rinse water. Manure would not be kept in the temporary storage container for a period exceeding one week and would not be stored in an open storage mound on-site. With implementation of the operational treatment control bioretention basins, and animal waste management, potential pollutants would be reduced to the maximum extent feasible.

Therefore, development of the proposed project would not violate any water quality standards or waste discharge requirements, including but not limited to increasing pollutant discharges to receiving waters. Impacts would be less than significant.

b)Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

 Potentially Significant Impact	 Less than Significant Impact
Less Than Significant With Mitigation Incorporated	No Impact

Discussion/Explanation:

Less than Significant Impact: The proposed project is currently served by existing on-site groundwater wells. The proposed manure processing plant would require approximately 400,000 gallons of water per year which would be trucked into the project site and would not be serviced by the existing groundwater wells. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including, but not limited to the following: the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. ¼ mile). These activities and operations can substantially affect rates of groundwater recharge. Therefore, a less than significant impact to groundwater resources is anticipated.

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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 surface, in a manner which would:

b)	result in substantial erosion or siltat	ion on	- or off-site;
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less Than Significant Impact: As outlined in the SWQMP, the project would implement the following site design measures, source control, and/or treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff: silt fence, fiber rolls, gravel and sand bags, vegetation stabilization planting, construction road stabilization, entrance/exit inspection and cleaning facility, stabilized construction entrance, spill prevention and control, material delivery and storage, waste management concrete waste management, sanitary waste management and bioretention basin.

These measures would control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (San Diego RWQCB Order No. R9-2007-0001), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program and Standard Urban Storm Water Mitigation Plan. The SWQMP specifies and describes the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream drainage swales. The Department of Public Works would ensure that the Plan is implemented as proposed. Due to these factors, the project would not result in significantly increased erosion or sedimentation potential and would not alter any drainage patterns of the site or area on- or off-site.

Moreover, the project would not contribute to a cumulatively considerable impact. Projects listed in Section XXI b) would be subject to federal, state, and local regulations including the NPDES permit that are designed to reduce stormwater runoff from project sites by promoting infiltration, minimizing impervious, and requiring a no-net increase in flows over the existing condition through hydromodification processes. Any short-term impacts resulting from alterations of drainage and hydrology resulting in substantial erosion or siltation on- or off-site would be minimized with the incorporation of appropriate construction BMPs and operational compliance with the San Diego Municipal Permit as implemented by the San Diego County Jurisdictional Urban Runoff Management Program and Standard Urban Storm Water Mitigation Plan. Therefore, the project's contribution would not be cumulatively considerable.

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c)	substantially increase the rate or an would result in flooding on- or offsite		of surface runoff in a manner which
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact
ess tha	an Significant. The project proposes th	ne con	struction of a 16,200 square foot ma

Less than Significant. The project proposes the construction of a 16,200 square foot manure processing building along with concrete pads on the perimeter for truck loading. Construction of the proposed project would require grading which could temporarily alter the existing drainage pattern of the site or area and result in flooding on- or off-site. However, the proposed project would include construction BMPs to limit an increase in storm water flows during construction and reduce the potential for construction related flooding to occur.

Post construction, the proposed project would not alter the natural drainage path or divert any water from the existing natural conditions or drainage boundaries. As discussed in the Drainage Study prepared by Michael Baker (Appendix C) post construction runoff would exit the project site at three discharge points, Basin 1, 2 and 3 similar to existing conditions. There are no changes within Basin 1 that are anticipated to impact runoff, as compared to existing conditions. In Basin 2, runoff is expected to sheet flow from the processing building to the east and west. Earthen swales would be constructed along the east and west edges of the site to direct runoff south and west towards two storm water mitigation basins. The proposed bioretention basins would infiltrate and detain runoff to mitigate the peak flow from the site. Any additional over flow from each of the two proposed mitigation basins would surface flow to the existing dual 12-inch corrugated metal pipes located in the southwest corner of the site.

In Basin 3, the proposed dryers would be installed between the existing hen houses and runoff would continue to drain westerly to an existing area that is controlled by existing, private dual 18-inch pipes. In addition, a brow ditch would be constructed along the easterly edge of the site, which would convey offsite flow to the southwest corner without comingling with on-site flow. Riprap energy dissipaters (or similar so long as it has the same or better effect as riprap) would be installed at the termination of the brow ditch to protect against erosion. The proposed stormwater facilities would reduce the project site peak flow discharge, as compared to existing conditions. Therefore, implementation of the proposed project would not substantially alter the existing drainage pattern of the site or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant.

d)		ould exceed the capacity of existing or provide substantial additional sources of
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated	Less than Significant Impact No Impact

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Less than Significant. As described above, the proposed project would require grading, which would loosen sediment and could temporarily alter the existing drainage pattern of the site and result in additional sources of polluted runoff. However, implementation of construction BMPs would minimize the potential for construction related sources of pollution or increases in storm water flows.

As discussed above the stormwater facilities would control the velocity and amount of runoff post- development to ensure that runoff does not exceed pre-development conditions. The proposed bioretention basins provide the added benefit of water quality treatment. Therefore, the existing storm drainage system would be sufficiently sized to convey the post-development condition and impacts would be less than significant.

e)	impede or redirect flood flows?					
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			
The pro Regulato structure	No Impact . The project is located in Zone X (unshaded) on the FEMA Firm map 06073C1150G The proposed project does not include fill, grading, or any other work within a mapped Regulatory Floodplain or Floodway. In addition, the proposed project would not place any structures within a 100-year floodplain. Therefore, implementation of the proposed project would not impede or redirect flows.					
d) In floc inundatio	ed hazard, tsunami, or seiche zones, ris	k relea	ase of pollutants due to project			
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact			

No Impact. A tsunami is a very large ocean wave caused by an underwater earthquake or volcanic eruption. Tsunamis can cause flooding to coastlines and inland areas less than 50 feet above sea level and within one mile of the shoreline. The entire proposed project area is located more than one mile inland and would not be susceptible to inundation or flooding due to a tsunami. Seiches are defined as wave-like oscillatory movements in enclosed or semi-enclosed bodies of water, such as lakes or reservoirs, and are most typically associated with seismic activity.

The closest enclosed body of water is Lake Sutherland located approximately three miles from the project site. The project site is not at risk of a seiche. In addition, the project site is generally flat with no steep slopes and does not contain slopes subject to potential landslide or mudflows. Therefore, the proposed project would not result in the release of pollutants due to project inundation.

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e)		flict with or obstruct implementation of a ndwater management plan?	water	quality control plan or sustainable	
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact	
Dis	cuss	ion/Explanation:			
cor from run and qua a g bro obs ma	Less than Significant Impact. As described in Section X(a), the project would implement a combination of site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. This includes the proposed water quality basin to treat on-site runoff. In addition, the proposed BMPs are consistent with regional surface water, storm water and groundwater planning and permitting processes established to improve the overall water quality in County watersheds. The existing Demler Brothers Egg Ranch obtains its water from a groundwater source. However, water needed for the new manure processing facility would be brought to the site from an outside source. As a result, the project would not contribute to an obstruction to implementation of a water quality control plan or sustainable groundwater management plan. XI. LAND USE AND PLANNING Would the project:				
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact	
Dis	cuss	ion/Explanation:			
No Impact: The project site is located in a nonurbanized area in the community of Ramona. The land use surrounding the project site includes rural residential and agriculture. The project does not propose the introduction of new infrastructure such as major roadways or water supply systems, or utilities to the area. Therefore, the proposed project would not significantly disrupt or divide an established community. No impacts would occur.					
b)	b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact	

Discussion/Explanation:

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Less Than Significant Impact: The proposed project is subject to the General Plan Rural Lands Regional Category and contains lands within the RL-40 Land Use Designation. The project is also subject to the policies of the Ramona Community Plan. The Applicant proposes to construct a 16,200 square foot building to house a manure processing system which would allow the existing on-site egg ranch to become more efficient and sustainable. The project is an allowable use under the current A72 (General Agriculture) zone that applies to the property with approval of an MUP from the County of San Diego. Therefore, the project would not result in a conflict with any land use plan, policy or regulation. Impacts would be less than significant.

XII. MII	XII. MINERAL RESOURCES Would the project:						
a)	· ·						
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact				
Discus	sion/Explanation:						
Californ Classiff 1997). in the l	nia Department of Conservation – Division ication: Aggregate Materials in the Weste The project site does not contain alluvium	n of Mi ern Sai or mir source	project site have not been classified by the nes and Geology (Update of Mineral Land In Diego Production-Consumption Region nes. The proposed project would not result that would be of value to the region and significant.				
•	b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?						
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact				

Discussion/Explanation:

No Impact: Important mineral resource areas are recognized at the federal and State levels through environmental resource management plans and adopted mineral resource mapping; they are recognized at the local level through land use planning documents such as general plans that incorporate such information. State Mining and Geological Board identifies mineral resources valuable to the state with the following Mineral Resource Zones (MRZ) designations:

MRZ-1: A zone where adequate information indicates that no significant mineral deposits are present or likely to be present.

MRZ-2: A zone where adequate information indicates that significant mineral deposits are present or a likelihood of their presence and development should be controlled.

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MRZ-3: A zone where the significance of mineral deposits cannot be determined from the available data.

MRZ-4: A zone where there is insufficient data to assign any other MRZ designation.

The project site is not located in an area that has MRZ-2 designated lands or is located within 1,300 feet of such lands. Therefore, the proposed project would not result in the loss of availability of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan. No impacts would occur.

XIII. NOISE -- Would the project result in:

a)	•	andard	nanent increase in ambient noise levels in ds established in the local general plan of her agencies?
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less Than Significant Impact: Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise sensitive and may warrant unique measures for protection from intruding noise. The closest residence is located approximately 1,300 feet from the proposed facility.

Construction

The proposed processing building would be constructed on a graded pad that was previously used as a location for additional hen houses. The project grading would include a balance scenario with about approximately 3,000 cy of earthwork with an additional estimated 800 cy of imported decomposed granite for placement between existing buildings. No improvements are required or proposed for the access drive.

Construction noise represents a short-term impact on the ambient noise levels. Noise generated by construction equipment includes haul trucks, water trucks, graders, dozers, loaders and scrapers can reach relatively high levels. Grading activities typically represent one of the highest potential sources for noise impacts. The most effective method of controlling construction noise is through local control of construction hours and by limiting the hours of construction to normal weekday working hours. Construction activities are estimated to last six months.

In accordance with Sec. 36.409 of the County Noise Ordinance, except for emergency work, the construction equipment shall not be operated in a manner that exceeds an average sound level of 75 decibels (dBA) for an eight-hour period, between 7 am and 7 pm, when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

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The Noise Analysis prepared by Ldn Consulting dated October 16, 2021 (Appendix E) calculated construction noise sound levels using a point-source noise prediction model. As shown in Table 7, even if all the equipment were placed together the cumulative grading activities noise levels would be 78.9 dBA and would attenuate 6.0 dBA at a distance of 100-feet from the point source noise and would be at or below the 75 dBA threshold. It should be noted that the nearest property line is approximately 400 feet from the construction activities and the noise levels would drop by 18 dBA as shown in Table 7. At distances over 400 feet the grading activities are not anticipated to exceed the County Noise Standards and impacts would be less than significant.

Source Level at **Duty Cycle Cumulative Noise Level at Construction Equipment** Quantity (Hours/Day) 50 Feet (dBA) 50 Feet (dBA) Dozer - D8 1 74 8 74.0 2 72 8 Tractor/Backhoe 75.0 1 73 Loader/Grader 8 73.0 Cumulative Levels at 50 Feet 78.9 Distance to Property Line (Feet) 400 Noise Reduction Due to Distance -18.0

NEAREST PROPERTY LINE NOISE LEVEL

Table 7 - Construction Noise Levels

Source: Appendix E **Notes**: dBA=decibels

Operation

The proposed project would continue to use the existing manure collection methods within their hen houses. Currently, the egg ranch has one method for manure collection for both the older and newer hen houses on-site. Conveyor belts inside the hen houses transports the manure into semi-truck trailers, which then haul the manure off-site. However, manure from the older hen houses must be stored in on-site dry wells then transported to the loading area near the new houses by on-site trucks. Instead, manure would be collected and transported to the proposed pelleting system on-site. The newer hen houses, immediately adjacent to the proposed project, would have covered conveyor belts that would transport the manure from the hen houses to the proposed manure pelleting building. On the way to the pelleting building, the conveyor belts would pass through a drying system that is heated from hot air blown out from the existing fans of the henhouses. The conveyor belts would be self-automated and run on a set schedule. Manure from the older hen houses would first be collected in existing on-site dry wells then transported to the proposed manure processing facility via existing on-site trucks. The proposed system would operate using three 100 horsepower electric motors and the remainder of the equipment. In addition, the proposed equipment would include up to five drying fans. All the proposed noise producing equipment would be located within the proposed building.

The County's General Plan requires an acoustical study be prepared for any use that may expose noise sensitive area to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 dBA. Moreover, if the project is excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to project to reduce noise levels. Noise sensitive areas include residences,

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hospitals, schools, libraries or similar facilities. The proposed project would not expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial or other noise in excess of the 60 dBA CNEL or 65 dBA CNEL as allowed in the Noise Element.

Based on the Noise Analysis prepared by Ldn Consulting, non-transportation noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the project's property line. The site is zoned AG-72 that has a one-hour average sound limit of 50 dBA. The adjacent properties are zoned residential and have one-hour average sound limit of 45 dBA. Table 8 provides the proposed operational noise levels and anticipated property line noise levels at the nearest offsite receptors.

Table 8- Operational Noise Levels

Source	Source Distance (feet)	Noise Level (dBA)	Quantity	Combine Noise Level (dBA)	Distance to Nearest Property Line (feet)	Reduction from distance (dBA)	Resultant Noise Level (dBA)	
Electric Motors	3	74	3	78.8	867	-49.2	29.6	
Drying Fans	3	74	5	81.0	857	-49.2	31.8	
Trucks	25	64.2*	2	67.2	867	-30.8	36.4	
Cumulative No	ise Level						38.3	

Source: Appendix E

Notes: Reduced Noise Level due to limited operations dBA=decibels

As shown in Table 8, the cumulative noise levels would be less than the most restrictive noise threshold of 45 dBA at the nearest property line. As such, the proposed project would not exceed County Noise Standards.

Finally, the project's conformance to the County General Plan and County Noise Ordinance (Section 36-404 and 36.410) ensures the project would not create cumulatively considerable noise impacts. The project would not exceed the local noise standards for noise sensitive areas, would not exceed the applicable noise level limits at the property line, and would not exceed construction noise limits. Therefore, the project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

b)	G	Seneration of excessive groundborne vib	ration or gı	oundborne noise levels?
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact
Disc	cussi	ion/Explanation·		

Less than Significant Impact: Conventional construction techniques, such as earth movement by trucks, have the potential to generate groundborne vibration and noise.

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Construction does not propose the use of a jack hammer or pile driving equipment. In addition, no blasting or rock crushing is proposed.

The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

- 1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
- 2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
- 3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
- 4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area. Impacts would be less than significant.

c)	where such a plan has not been adopted	, withir	vate airstrip or an airport land use plan or n two miles of a public airport or public use siding or working in the project area to		
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact		
Discu	ssion/Explanation:				
for air	No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan for airports or within 2 miles of a public airport or public use airport. Therefore, the project would not expose people residing or working in the project area to excessive airport-related noise levels.				
XIV. F	POPULATION AND HOUSING Would to	he proj	ect:		
a)	Induce substantial unplanned population by proposing new homes and businesse of roads or other infrastructure)?	_	h in an area, either directly (for example, adirectly (for example, through extension		
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact		

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Discussion/Explanation:

No Impact: The proposed project would not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or Local Agency Formation Commission annexation actions.

,	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				
	Potentially Significant Impact		Less than Significant Impact		
	Less Than Significant With Mitigation Incorporated		No Impact		
Discussi	ion/Explanation:				
used as facility o	the Delmer Brothers Egg Ranch. The	projec	any existing housing. The existing site is of proposes to add a manure processing e as a result of the project Therefore, no		
XV. PU	BLIC SERVICES				
p a e o	ltered governmental facilities, the constr	ernme uction ain acc	ental facilities, need for new or physically of which could cause significant eptable service ratios, response times or		
i. ii. iii iv V	Police protection? Schools? Parks?				
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact		
Discussi	ion/Explanation:				

i. Fire

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No Impact: The proposed project would not result in the need for significantly altered fire protection services or facilities. A Fire Service Availability Letter and conditions, dated January 30, 2019, has been received from the County Service Area Fire Protection District. The Fire Service Availability Letter indicates existing services are available to serve the project. In addition, the letter states that the expected emergency travel time to the project site to be 1.84 minutes. The Maximum Travel Time allowed pursuant to the Safety Element is five minutes. Therefore, the project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, in order to maintain acceptable service ratios, response times or other performance service ratios or objectives. No impact would occur.

ii. Police?

No Impact: The proposed project would not result in the need for significantly altered sheriff protection services or facilities. The project does not involve the construction of new or physically altered sheriff facilities in order to maintain acceptable service ratios, response times or other performance service ratios or objectives. Therefore, the proposed project would not have an impact regarding sheriff protection services.

iii. Schools?

No impact: The proposed project would not include any residential or business uses and as such would not result in population growth that would generate an increased demand for school facilities or require the construction of school facilities. Therefore, the proposed project would not have an impact regarding schools

iv. Parks?

No Impact: The proposed project would not develop the site with any residential uses and, as such, would not result in population growth that would generate an increased demand or construction for parks. Therefore, the proposed project would not have an impact regarding parks.

v. Other Facilities?

No Impact: The proposed project would not develop the site with any residential uses and, as such, would not result in population growth that would generate an increased demand or require construction for public facilities, such as libraries. Therefore, the proposed project would not have an impact regarding other public facilities.

XVI. RECREATION

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?

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	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact
Discussi	on/Explanation:		
residenti increase the vicir	al subdivision, mobile home park, or cor the use of existing neighborhood and	nstruct regior	dential use, included but not limited to a tion for a single-family residence that may nal parks or other recreational facilities in ation of the facility would occur or be
,			or require the construction or expansion of erse physical effect on the environment?
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact
Discussi	on/Explanation:		
•	act: The project does not include recreation of recreational facilities. Therefore, r		al facilities or require the construction or act would occur.
a) C	RANSPORTATION Would the project onflict with a program plan, ordinance on cluding transit, roadway, bicycle and pe	r polic	
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact
Discussi	on/Explanation:		

Less Than Significant Impact: The proposed facility would allow manure generated by operation of the existing egg ranch to be processed on-site rather than shipping unprocessed manure off-site. Operating at full capacity, the existing operations at the Demler Brothers Egg Ranch are estimated to generate 48 daily passenger car equivalent (PCE) trips. With the implementation of the new manure processing facility, the project is estimated to generate 34 daily PCE trips (including new employee trips) which results in a net decrease of 14 PCE trips.

The project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities. Therefore, the project would not conflict with any policies establishing measures of the effectiveness for the performance of the circulation system and no mitigation is required.

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subdivision (b)?						
☐ Potentially Significant Impact ☐ Less than Significant Impact ☐ Less Than Significant With Mitigation ☐ No Impact						
Discussion/Explanation: In December 2018, the California Resources Agency certified and adopted revised CEQA Guidelines, including a new Section 15064.3. Under the new Section 15064.3, VMT, which includes the amount and distance of automobile traffic attributable to a project, is identified as the "most appropriate measure of transportation impacts." As of July 1, 2020, all CEQA lead agencies must analyze a project's transportation impacts using VMT.						
No Impact : The Governor's Office of Planning and Research published a Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018. This advisory provides a screening threshold for small projects. Projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. As stated in XVII a), the project is estimated to generate 34 daily PCE trips (including new employee trips) which results in a net decrease of 14 PCE trips. The proposed facility would allow manure generated by operation of the existing egg ranch to be processed on-site rather than shipping unprocessed manure off-site. The proposed manure drying system would remove approximately 30 percent of the water content in the poultry manure to reduce its weight and volume. This would reduce the truckloads generated by the site which would in turn reduce traffic associated with the transport of manure. This reduction in truck trips translates to fewer total VMT. Therefore, the project would not have a significant impact related to VMT.						
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?						
☐ Potentially Significant Impact ☐ Less than Significant Impact						
☐ Less Than Significant With Mitigation						
Discussion/Explanation:						

No Impact: Primary access to the site is currently provided by a 24-foot decomposed granite Egg Ranch private driveway located approximately 1,000 feet east of Rancho Santa Teresa Drive via SR-78. Trucks currently transport wet manure to off-site locations using this driveway and would continue to use this driveway to transport the processed dry pellets to offsite locations. The proposed project would not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls which impedes adequate site distance on a road. No impact would occur.

d) Result in inadequate emergency access?

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	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact				
Discuss	sion/Explanation:						
Egg Ra Drive vi and wou The pro served I Diego C Additior	No Impact: Primary access to the site is currently provided by a 24-foot decomposed granited Egg Ranch private driveway located approximately 1,000 feet east of Rancho Santa Teresa Drive via SR-78. Trucks currently transport wet manure to off-site locations using this driveway and would continue to use this driveway to transport the processed dry pellets to offsite locations. The proposed project would not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code, therefore, the project has adequate emergency access. Additionally, roads used to access the proposed project site are up to County standards. Therefore, the project would not result in inadequate emergency access.						
XVIII. T	TRIBAL CULTURAL RESOURCES W	ould t	ne project:				
defir land	ned in Public Resources Code §2107 scape that is geographically defined in	4 as terms	ificance of a tribal cultural resource, as either a site, feature, place, or cultural of the size and scope of the landscape, fornia Native American tribe, and that is:				
	isted or eligible for listing in the Californ egister of Historical Resources as define		ister of Historical Resources, or in a local ublic Resources Code §5020.1(k), or				
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact				
e F F	evidence, to be significant pursuant to Resources Code §5024.1. In applying t	criter the cri Agency	ts discretion and supported by substantial ia set forth in subdivision (c) of Public teria set forth in subdivision (c) of Public shall consider the significance of the				
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact				

Discussion/Explanation:

No Impact: Pursuant to AB-52, consultation was initiated with culturally affiliated tribes. County staff conducted Native American consultation pursuant to AB-52 requirements. Initial tribal outreach was conducted on April 23, 2019. Eight tribes (Barona, Campo, Jamul, Kwaaymii, Manzanita, Santa Ysabel, Sycuan, and Viejas) were contacted. Viejas responded and deferred

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to Santa Ysabel. Barona, Jamul, and Santa Ysabel requested formal consultation. All three tribes agreed that neither a cultural study nor archaeological monitoring including a tribal monitor would be required. No tribal cultural resources were identified during consultation. As such, the project would not result in impacts to tribal cultural resources.

XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact	
Discus	ssi	on/Explanation:			
No Impact: The project does not include new or expanded water or wastewater treatment facilities. In addition, the project does not require the construction or expansion of water or wastewater treatment facilities. Therefore, the project would not require any construction of new or expanded facilities, which could cause significant environmental effects.					
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact	
Discussion/Explanation:					
No Impact: The proposed project does not involve or require water services from a water district. The current project site and use is served by existing on-site groundwater wells, similar to other land uses present on the property. However, the proposed manure processing plant would require 400,000 gallons of water which would be trucked into the site and would not rely on the existing on-site groundwater wells. Therefore, there are sufficient water supplies to serve the project and no impact would occur.					
c)	c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact	

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ΑII

Discussion/Explanation:

No Impact: The proposed project would rely completely on an on-site wastewater system (septic system); therefore, the project would not interfere with any wastewater treatment provider's service capacity.

,		excess of State or local standards, or in excess of the capacity otherwise impair the attainment of solid waste reduction goals?		
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact	
Discuss	sion/Explanation:			
solid wa Diego C	aste facilities, including landfills require s County, the County DEH, LEA issues soli	solid v id wa	ne project would generate solid waste. All waste facility permits to operate. In San ste facility permits with concurrence from	

San rom the California Integrated Waste Management Board under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27. Division 2. Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

e)	egulations related to solid waste?	nagem	nent and reduction statutes and
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less than Significant Impact: Implementation of the project would generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County DEH, LEA issues solid waste facility permits with concurrence from the California Integrated Waste Management Board under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project would deposit all solid waste at a permitted solid waste facility and therefore, would comply with Federal, State, and local statutes and regulations related to solid waste.

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

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,	Substantially impair an adopted emergency response plan or emergency evacuation plan?			
	☐ Potentially Significant Impact ☐ Less than Si☐ Less Than Significant With Mitigation ☐ No Impact Incorporated	gnificant Impact		
Discussi	ission/Explanation:			
Forestry decomp Rancho locations	than Significant Impact: The project is located in a VHFHS stry and Fire Protection. Primary access to the site is curremposed granite Egg Ranch private driveway located approach Santa Teresa Drive via SR-78. Trucks currently transpons using this driveway and would continue to use this driveway ellets to offsite locations.	ently provided by a 24-foot ximately 1,000 feet east of port wet manure to off-site		
The proposed project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would physically impair or otherwise conflict with an Emergency Response Plan or Emergency Evacuation Plan. During short-term construction activities, the proposed project is not anticipated to result in any substantial traffic queuing on nearby streets, and all construction equipment would be staged within the project site. Therefore, impacts related to Emergency Response Plans and Emergency Evacuation Plans associated with construction of the proposed project would be less than significant. In addition, the proposed project does not include any changes to any public or private roadways that would interfere with the County Emergency Operations Plan or another adopted Emergency Response Plan or Emergency Evacuation Plan. Further, the proposed project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code, therefore, the project has adequate emergency access. Additionally, roads used to access the proposed project site are up to County standards. Impacts related to interference with an emergency response plan would be less than significant.				
, e	Due to slope, prevailing winds, and other factors, exacerbate expose project occupants to, pollutant concentration from a spread of a wildfire?	·		
	☐ Potentially Significant Impact ☐ Less than Si☐ Less Than Significant With Mitigation ☐ No Impact Incorporated	gnificant Impact		
Discussi	ission/Explanation:			

Less than Significant: The project site is in a VHFHSZ according to the California Department of Forestry and Fire Protection. Fire hazard designations are based on topography, vegetation, and weather, among other factors, with more hazardous sites including steep terrain,

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unmaintained fuels/vegetation, and wildland urban interface locations. Development within or adjacent to areas designated as VHFHSZs and/or wildland-urban interface areas has the potential to exacerbate wildfire risk, particularly if it occurs in areas with steep topography and/or prevailing winds because these conditions contribute to the spread of and make it more difficult to contain wildfires.

The project would comply with the International Fire Code; California Fire Code; regulations set forth in Sections 13000 et seq. of the California Health and Safety Code; and Title 14, Division 1.5, of the California Code of Regulations. The project would comply with County ordinances and the County Consolidated Fire Code. Implementation of these fire safety standards would occur during the building permit process. Also, a Fire Service Availability Letter and conditions, dated January 30, 2019, have been received from the County Service Area Fire Protection District. The conditions from the County Fire Authority include: a requirement of 100-feet of clearing around all structures. Therefore, based on the review of the project by County staff, through compliance with the Consolidated Fire Code and through compliance with the County Fire Authority's conditions, the project is not anticipated to exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire. Therefore, impacts would be less than significant.

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?				
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated	Less than Significant Impact No Impact		
Discussion/Explanation:				
No Impact: The proposed project would not include or require the installation or maintenance of associated infrastructure, including roads, fuel breaks, emergency water sources, power lines, or other utilities that would exacerbate fire risks. Thus, the project would not exacerbate fire risks that would result in temporary or ongoing impacts to the environment. Therefore, no impact would occur.				
, í	d) Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			
	Potentially Significant Impact Less Than Significant With Mitigation Incorporated	Less than Significant Impact No Impact		

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of this Initial Study (See Figure 5 – Cumulative Projects):

PROJECT NAME

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PERMIT/MAP NUMBER

Discussion/Explanation:

Less Than Significant Impact: Refer to Sections VII, Geology and Soils, and X, Hydrology and Water Quality, for a summary of impacts related to flooding, landslides, runoff, slope instability, and drainage changes.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:			
Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			
 □ Potentially Significant Impact □ Less Than Significant With Mitigation □ No Impact Incorporated 			
Discussion/Explanation:			
Less than Significant: Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. There is no substantial evidence that there are biological or cultural resources that are affected or associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.			
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)?			
 □ Potentially Significant Impact □ Less Than Significant With Mitigation □ No Impact Incorporated 			
Discussion/Explanation:			
The following list of past, present and future projects were considered and evaluated as a part			

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Ramona Ridge Estates	PDS1999-3100-5008		
Intermountain Fire Station	PDS200-ZAP-00-146		
Farren Health Care	PDS2011-3997-11-001		

Cumulative effects were considered as part of this Initial Study. It was found that the proposed project would not result in cumulatively considerable impacts. No substantial evidence exists showing that, after mitigation, cumulative effects associated with the project would occur. Therefore, the project has been determined not to meet this Mandatory Findings of Significance.

c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			
		Potentially Significant Impact Less Than Significant With Mitigation Incorporated		Less than Significant Impact No Impact

Discussion/Explanation:

Less than Significant: As discussed in this Initial Study, the proposed project's potentially significant impacts to air quality would be mitigated to a less than significant level. All other impacts were deemed less than significant and are discussed in this Initial Study. Therefore, the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly, and the project has been determined not to meet this Mandatory Findings of Significance.

XXII. APPENDICES AND REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

APPENDICES

Appendix A: Air Quality Assessment Demler Poultry Manure Processing Plant

Appendix B: Demler Manure Processing Facility Project Greenhouse Gas Screening Letter

Appendix C: Drainage Study for Demler Brothers Manure Processing.

Appendix D: Stormwater Quality Management Plan (SWQMP) For Priority Development Projects (PDPs) Demler Manure Processing Facility.

Appendix E: Noise Assessment for the Demler Manure Processing Facility Major Use Permit PDS2019-MUP-19-004 – County of San Diego CA.

Appendix F: Proposed Demler Brothers Poultry Manure Processing Project (PDS 2019-MUP-19-004) Trip Generation Memo.

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Appendix G: Vector Control Plan Demler Brothers, LLC Manure Processing Facility. March 2019

REFERENCES

AESTHETICS

- California Street and Highways Code [California Street and Highways Code, Section 260-283. (http://www.leginfo.ca.gov/)
- California Scenic Highway Program, California Streets and Highways Code, Section 260-283. (http://www.dot.ca.gov/hq/LandArch/scenic/scpr.htm)
- County of San Diego, Planning & Development Services. The Zoning Ordinance of San Diego County. Sections 5200-5299; 5700-5799; 5900-5910, 6322-6326. ((www.co.san-diego.ca.us)
- County of San Diego, Board Policy I-73: Hillside Development Policy. (www.co.san-diego.ca.us)
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